

SKAL 91



BRUCE KING  
GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT  
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JUDITH M. ESPINOSA  
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MEMORANDUM

DATE: November, 5 1991

TO: Judith M. Espinosa, Secretary

THROUGH: Ed Horst, Program Manager  
Hazardous and Radioactive Materials Bureau

*SA* Benito Garcia, Chief  
Hazardous and Radioactive Materials Bureau

*KS* Kathleen Sisneros, Director  
Waste and Water Management Division

FROM: Dr. Herbert D. Grover, Coordinator *hdg*  
RCRA Permit Group, HRMB

RE: Operating permit for the Albuquerque Safety-Kleen facility.

1. Hazardous Waste Units and Waste Managed at the Albuquerque Safety-Kleen Service Center:

Safety-Kleen is a commercial service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. Safety-Kleen offers three services which involve the accumulation and storage of spent solvent. The listed hazardous wastes which are stored at the facility include parts cleaner solvent and dry cleaner solvent. The Albuquerque Service Center will soon begin accumulation of paint wastes. These wastes are presently stored in two container storage units in the main warehouse, and in an underground storage tank. An ignitable waste container storage building is to be constructed, and a double walled underground storage tank system is to be installed to replace the existing system. The wastes that are accumulated at the Service Center are shipped to one of seven Safety-Kleen recycle centers, or to an independent reclaimer, and are then returned to the customers as usable product.

The permit describes the structures, equipment, and procedures Safety-Kleen will use to store hazardous waste in the existing storage container building, the proposed ignitable waste

container storage building, and the replacement double walled underground storage tank in compliance with the New Mexico Hazardous Waste Management Regulations. The wastes will be stored in containers which meet or exceed Department of Transportation (DOT) requirements and are physically separated according to compatibility. The permit includes a waste analysis plan, inspection plan, training plan, emergency contingency plan, closure plan, financial assurance, operating procedures, and the regulations applicable for the permit period. The U.S. Environmental Protection Agency (EPA) also impose additional requirements on hazardous waste management facilities and these requirements will be administered and enforced by the EPA under authority of the Hazardous and Solid Waste Amendments of 1984 (HSWA).

## 2. Changes to the Draft Permit:

The New Mexico Environment Department (NMED) submitted two draft permits for public comment regarding this facility. The first draft permit was issued January 7, 1991, and was open to public comment until February 21, 1991. On April 8, 1991 the permit process was temporarily suspended due to changes in construction plans for the proposed Underground Waste Solvent Storage Tank system and the Flammable Waste Container Storage Building. NMED resubmitted a revised draft permit May 20, 1991 for which the revisions to the draft permit were open to public comment an additional 60 days. The public comment period expired July 18, 1991.

Comments were received from the EPA, Safety-Kleen, the City of Albuquerque Health Department, the New Mexico Hazardous and Radioactive Materials Bureau, the New Mexico Occupational Health and Safety Bureau, and a private citizen. Changes made to the permit in response to the comments are detailed in the Responses-to-Comments letter that is attached. Except for the revisions regarding the proposed Underground Waste Solvent Storage Tank system and the Flammable Waste Container Storage Building, most of the changes were to clarify conditions of the permit.