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April 24, 1992

Certified Mail #P 359 378 484

Mr. Allyn Davis
Director
Hazardous Waste Management Division
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Suite 1200
Dallas, Texas 75202-2733

RE: Safety-Kleen Corp.
2720 Girard NE
Albuquerque, New Mexico 87107
EPA I.D. NMD000804294



Dear Mr. Davis:

Under the requirements of the Hazardous Waste Permit (HSPA) permit, for the above-referenced Safety-Kleen (S-K) facility, a RCRA Facility Investigation (RFI) Workplan is due within one hundred twenty (120) days of the effective date of the Permit (January 11, 1992). The RFI is required to further investigate SWMU #4 (Underground Storage Tank for Spent Solvent Sediments) as identified during the facility RFA. The RFA documents SMWU #4 to have been in-line between the interim status Solvent Return and Fill Shelter and the waste Mineral Spirits UST.

This SMWU, in addition to the interim status Solvent Return and Fill Shelter and waste Mineral Spirits Underground Storage Tank (10,000 gallon) are no longer in service and were only permitted as interim status units. The old UST and Return and Fill were removed from service in March 1992, upon completion of the installation of the new double-walled UST and Return and Fill as referenced in the final Facility Part B Permit. The new unit locations are as depicted in the Facility Site Diagram of the Permit.

S-K has initiated closure activities associated with the old UST system. A Closure Plan, per 40 CFR 264.197, for the old Solvent Return and Fill Shelter and waste Mineral Spirits Underground Storage Tank (10,000 gallon) is to be submitted to the New Mexico Environment Division (NMED) for approval, on May 8, 1992.

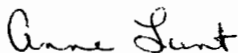
Recently, S-K has conducted assessment activities of the soils proximal to these units. The investigations were initiated in response to a documented product Mineral Spirits UST feedline release which occurred on September 23, 1991. Two investigations were conducted to delineate the extent of product release. The initial investigation findings are presented in an "On-Site

Investigation Report", dated November 4, 1991. The subsequent assessment activities are documented in "Results of Additional Assessment Activities, Safety-Kleen Corp. Service Center Albuquerque, New Mexico", dated April 14, 1992.

This situation has been discussed with EPA agent Richard Mayer during a telephone conversation on April 21, 1992. Per the conversation, S-K is submitting copies of both of these assessment reports to EPA, Region 6. S-K is submitting these reports in place of the RFI workplan and will be supplying the EPA with a copy of the above-mentioned Closure Plan upon submittal. S-K seeks EPA concurrence that the assessment work that has been completed as well as the pending unit closures will address all Permit identified RFA concerns. Should additional RFI work be required S-K proposes that the requirements be addressed during the unit closure activities.

Please contact me at (310) 831-3903 should you have any questions or comments concerning the assessment activities or findings. Thank you for your attention in this matter.

Sincerely,



Anne Lunt
Sr. Project Manager-Remediation
Safety-Kleen Corp.

cc: Dr. Herb Grover
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