



Red-File

April 21, 1993

Barbara Hoditschek
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Dept.
Harold Runnels Building
1190 St. Francis Drive
Santa Fe, NM 87502

Re: Comments on Public Notice of Proposed Closure Plan and
Conditions for Approval, Safety-Kleen Corp. Service Center,
Albuquerque, New Mexico (NMD000804294)

Dear Ms. Hoditschek:

As per your letter dated March 22, 1993, Safety-Kleen Corp. (S-K) understands the Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the May 18, 1992, Closure Plan and has issued a 30-day public comment period. The Closure Plan describes procedures to close an inactive underground storage tank system (USTs), return/fill station and associated equipment at the S-K Service Center in Albuquerque, New Mexico (2720 Girard NE). These hazardous waste management units are scheduled to be closed in accordance with the applicable RCRA interim status regulations.

Based on the review, HRMB has determined the Closure Plan meets the requirements of HWMR-7, Part VI, Section 40 CFR 265.112. The public comment period includes notification of the HRMB intent to approve the proposed Closure Plan with Conditions for Closure Plan Approval. S-K has reviewed the Conditions for Closure Plan Approval and has determined that several of the conditions require response and/or clarification. The purpose of this letter is to present S-K's responses and/or clarifications to the Conditions for Closure Plan Approval.

CONDITION (1) Page #III-7, first paragraph:

Any contamination identified during closure activities shall be subject to RCRA hazardous waste management requirements unless Safety-Kleen clearly demonstrates to NMED that the contamination resulted from sources other than a RCRA regulated hazardous waste management unit.

RESPONSE TO CONDITION (1): S-K performed a preliminary subsurface investigation in January-February 1992 to evaluate potential

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impacts in the vicinity of the old USTs and return/fill station (reference Appendix B of Closure Plan). During the 1992 investigation, samples were collected from soil borings constructed as close to the old USTs and return/fill station as possible. The samples were field screened, and the most impacted soil samples were submitted to the laboratory for analyses. In addition, a composite sample (DS-1) of the auger cuttings was submitted for laboratory analysis of the toxicity characteristics.

The results of the analyses indicate that the degraded soils in the vicinity of the units scheduled for closure do not exhibit the characteristics of hazardous waste. Based on the 1992 investigation results and considerable past experience, S-K believes that degradation encountered during the proposed closure activities may be managed as non-hazardous waste. S-K proposes to inspect the material excavated during the closure activities. If the conditions appear different than anticipated or identified during the 1992 investigation, additional samples will be collected and analyzed to determine the appropriate management procedures.

CONDITION (2) Page #III-7, paragraph 5:

All waste residues and decontamination waste water generated during closure activities shall be disposed of as hazardous waste unless laboratory analytical results demonstrate the waste is non-hazardous.

RESPONSE TO CONDITION (2): No response necessary.

CONDITION (3) Page III-11, third paragraph:

Contaminated soils and concrete that are excavated during closure shall be sampled and laboratory analyzed to determine proper management and disposal as non-hazardous or hazardous.

RESPONSE TO CONDITION (3): The inactive UST and return/fill station were used to manage spent mineral spirits. Spent mineral spirits has the potential to exhibit the characteristics of ignitability and toxicity (reference Table II-1 of Closure Plan). Therefore, soils and concrete degraded with spent mineral spirits would be hazardous only if the material exhibits the characteristics of hazardous waste.

As discussed in the Response to Condition (1), samples collected during the 1992 investigation were analyzed to evaluate the characteristics, degree and extent of degradation. The results of the analyses indicate soils in the vicinity of the old UST and

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return/fill station do not exhibit the toxicity characteristics of hazardous waste. Therefore, S-K believes that additional sampling and analysis of soils and/or concrete is unnecessary to document/justify appropriate management as a non-hazardous waste.

CONDITION (4) Page III-12, second paragraph:

Degraded soils and other waste debris excavated during closure activities that are temporarily stored on plastic sheeting shall be kept covered or otherwise managed to minimize wind dispersal and precipitation run-on and run-off.

RESPONSE TO CONDITION (4): No response necessary.

CONDITION (5) Page II-12, third paragraph:

The HRMB shall be notified at least 10 days prior to the soil sampling events.

RESPONSE TO CONDITION (5): No response necessary.

CONDITION (6) Page II-13:

Safety-Kleen shall collect and analyze soil samples at a depth of 24" to 30" at the location selected in #1 and #2 in Activity 2.7, pages III-12 and III-13, (8 samples total).

RESPONSE TO CONDITION (6): No response necessary.

CONDITION (7) Page III-13, fourth paragraph:

A closure plan amendment request will be prepared and submitted to the NMED within 60 days of completion of Phase 3 sample collection. The amendment request shall include a plan to effectively monitor, and remediate any residual subsurface contamination to below NMED-Approved Health-Based Exposure Limit Criteria.

RESPONSE TO CONDITION (7): This condition refers to submittal of a closure plan amendment which is referenced under Activity 2.7 (page III-13) and Phase 4 (page V-1). The results of Phase 3 (Additional Assessment Activities) will be necessary to evaluate the extent of potential subsurface impacts and develop an appropri-

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ate closure plan amendment/remedial action plan. Therefore, S-K proposes to submit a closure progress report (Phases 1-3) and a closure plan amendment/remedial action plan (Phase 4) within 60 days following receipt of complete and accurate laboratory data from Phases 2 and 3.

CONDITIONS (8) Page III-14, Activity 2.9:

Safety-Kleen shall report the location where clean fill was obtained.

RESPONSE TO CONDITION (8): No response necessary.

CONDITION (9) Page IV-2, third paragraph:

Subsurface soils laboratory analytical results shall demonstrate at least 10 feet of uncontaminated soils underneath the USTs in the vadose zone, or groundwater monitoring shall be conducted to determine impacts to groundwater from releases from the units.

RESPONSE TO CONDITION (9): S-K understands that ground-water monitoring will be required, if subsurface degradation due to the units undergoing closure (i.e. inactive USTs and return/fill station) extends to within 10 feet of the ground-water table. Information obtained during the 1992 investigation activities indicates that the depth to ground water underlying the site is at least 200 feet below ground surface. The results of the additional assessment activities (Phase 3) will be used to support the 1992 data and determine the vertical extent of impacts relative to ground water.

CONDITION (10) Page IV-4, second paragraph:

The report shall be submitted to NMED within 60 days after samples are collected.

RESPONSE TO CONDITION (10): The results of the additional assessment activities (Phase 3) will be necessary to evaluate the extent of subsurface impacts and develop an appropriate remedial action program. S-K intends to prepare the Phase 3 assessment report in conjunction with the closure progress report and closure plan amendment (reference Condition 7). Therefore, S-K proposes submittal of this comprehensive document(s) within 60 days following receipt of complete and accurate laboratory data, as opposed to within 60 days after sample collection.

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CONDITION (11) Page IV-4, third paragraph:

The clean up levels shall be NMED-Approved Health-Based Exposure Limit Criteria. The criteria for clean closure are found in 55 FR No. 145, Appendix A through F, pages 30865-30873, dated July 27, 1990. The EPA Office of Solid Waste at (202) 260-4761 or the Environmental Criteria Assessment Office at (513) 569-7595 shall be consulted for the most current health effects data on any constituent of interest. The Point of Exposure is the location of the highest concentration of contamination released to the subsurface within the excavated unit. Combined health effects of contaminants shall be used to establish clean up concentrations.

RESPONSE TO CONDITION (11): No response necessary. S-K understands that NMED criteria for clean closure are presented in 55 FR No. 145, Appendix A through F, dated July 27, 1990, and the Point of Exposure is the location of the highest concentration of contamination released to the subsurface from the excavated unit.

CONDITION (12) Page V-1:

Safety-Kleen shall conduct Phase 3 Additional Assessment activities to determine the extent of soil and groundwater degradation and to develop site clean up activities. Within 60 days of completion of Phase 3 activities Safety-Kleen shall submit to NMED a detailed closure plan modification request to remove or decontaminate the site to NMED-Approved Health-Based Exposure Limit Criteria, or Safety-Kleen shall submit the certification report described in Activity 5.2.

RESPONSE TO CONDITION (12): Reference responses to Condition 7, 9, 10 and 11.

CONDITION (13) Page VI, fourth paragraph:

The independent registered professional engineer shall be registered in the State of New Mexico.

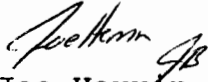
RESPONSE TO CONDITION (13): No response necessary.

S-K requests that NMED consider the above responses in finalizing approval of the Closure Plan. We are available to meet with the NMED to discuss the responses/clarifications to the Conditions for

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Closure Plan Approval. If you have any questions or need additional information, please feel free to contact Jack Bedessem (TriHydro Corporation) at (307) 745-7474 or me at (713) 280-9754.

Sincerely,
SAFETY-KLEEN CORP.



Joe Herrin
Senior Project Manager - Remediation

JB:jbs/561

cc: Gary Long
Bob Wachsmuth
Ralph Ondatje
TriHydro Corporation

TriHydro Corporation
920 Sheridan Street
Laramie, WY 82070

Phone: (307) 745-7474 Fax: (307) 745-7729

FAX TRANSMITTAL COVER SHEET

URGENT

DATE: 4/27/93 TIME: 3:45 JOB: 561 TOTAL NO. OF PAGES
(including this sheet): 8

TO:

NAME/COMPANY	TELEPHONE NO.	FAX NO.
<u>Ms. Barbara Hoditschek</u>	<u>(505) 827-4308</u>	<u>(505) 827-4389</u>
<u>New Mexico Environment Dept./HRMB</u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>

FROM:

TriHydro Corporation/ Jack Bedessem for Safety-Kleen Corp.

ACTION REQUESTED:

- FAX REPLY PLEASE CALL
 WRITTEN REPLY REPLY NOT NECESSARY

COMMENTS: In a letter dated March 22, 1993, HRMB issued a public comment period
on the proposed closure plan for the Safety-Kleen Corp. (S-K) service center (NMD000804294)
in Albuquerque, NM (2720 Girard NE). On April 21, 1993, TriHydro Corporation attempted to
send comments to HRMB in response to the public comment period on behalf of S-K. The comment
letter was sent 2nd-day UPS; however, the package was returned to TriHydro Corporation because
of damage on April 27, 1993. As per a telecon with HRMB on April 27, 1993, Mr. Carl Stubbs
indicated that it was acceptable to fax a copy of the S-K comments. Also attached is a copy
of the UPS tracking label and damage notice. A copy of the S-K comments has also been sent
to HRMB by overnight UPS mail.

Place a UPS 2nd Day Air Tracking Label

UPS 2ND DAY AIR TRACKING LABEL



INSTRUCTIONS
 1. ENTER WEIGHT & SHIPPER NO.
 2. REMOVE BACKING



A *LTP* *2512 6903 510*

TRACKING NO 2512 6903 510

STAMP UPS SHIPPER NUMBER



3. AFFIX TO CARTON DIRECTLY LEFT OF THE ADDRESS LABEL



UPS USE

2512 6903

Place your address label below



Till Hydro Corporation

920 Sheridan Street (307) 745-7474
 Laramie, Wyoming 82070 Fax: (307) 745-7729

To: Ms. Barbara Hoditschek
 Hazardous and Radioactive
 Materials Bureau
 New Mexico Environment Dept.
 Harold Runnels Bldg.
 1190 St. Francis Dr.
 Santa Fe, NM 87502



United Parcel Service
 Remove Backing and Place this Notice Below the Receiver's Name on the First Line of the Package Address Label

Leave Shipper's Address Visible

11312 REV 8-87(50M PADS 9-92)

PLACE THIS FORM BELOW FIRST LINE OF ORIGINAL RECEIVER'S NAME

RETURN TO SHIPPER-Damage Notice

DEAR SHIPPER:
 WE REGRET THIS PACKAGE WAS DAMAGED

THE DAMAGED CONTENTS HAVE BEEN DISCARDED AND THE BALANCE IS ENCLOSED.
 THE ENTIRE CONTENTS ARE ENCLOSED.
 THE DAMAGED PORTION IS ENCLOSED.
 THE CONSIGNEE HAS RECEIVED THE BALANCE:

WE WILL CONTACT YOU REGARDING THE DAMAGE.
 PLEASE WAIT FOR OUR CALL.

Thank You
 United Parcel Service

DATE <i>4/22</i>	CENTER <i>SL</i>	SUPERVISOR
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RETURN DRIVER:

Record Original Receiver's Name in addition to Shipper Number in Shipper Number Column of the Delivery Record

Record Reason for Return
DAM
 In Remarks or Reason Returned Column of Delivery Record

PEEL TO PEEL LABEL