



June 23, 1993 RPW 93-194

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Barbara Hoditschek, Manager
RCRA Permit Program
State of New Mexico
Environment Department
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Sante Fe, New Mexico 87502

RE: NMD000804292
Safety-Kleen Corp.
Albuquerque NM.
Class I Modifications



Dear Ms. Hoditscheck:

Per recent telephone conversations with Marc Sides of your staff I am submitting Class I modifications to our exiting permit:

1. Changing the Saftey-Kleen corporate office address.(see revised pages 1 and 56)
2. The references to our containers for color and drum sizes we want deleted.(see revised pages 4,5,12,22,23,25,26,27,32,33, 34,35,47, and 49)
3. The flammable storage building is a masonry building not a metal structure.(see revised pages 2, and 57)
4. The outdoor lighting turns on at low light hours of the day instead of twenty-four hour lighting as was stated.(see revised pages 40 and 41)
5. The regional environmental engineer or regional manager must review the facility inspection records at least three times per year instead of the regional manager doing it four times per year.(see revised page 42)
6. The alternate emergency coordinator will be a trained employee designated by the emergency coordinator instead of the branch secretary.(see revised pages 58 and 59)
7. The emergency information sheet in Appendix needs to updated and the Emergency information on page 58 needs to be updated.



8. The field spill report needs to be updated in Appendix F and on page 69.

9. The facility inspection sheets have been revised and should be put into Appendix E.

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10. Module IV of the permit did not include the waste code for the mineral spirits tank as D001. This should be added. It was inadvertently left out.

Since these are all Class I modifications to the permit, we will need the mailing list to send the notification of these minor changes. Marc Sides also told me there would be a fee to make these change.

If you have any questions please call me at 303-322-7328.

Sincerely,

Robert Wachsmuth
Environmental Engineer

✓
cc: J. Bard
7-008-01 File 1020

FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS: Safety-Kleen Corp.
1000 N. Randall Road
Elgin, IL 60123-7857
708/697-8460

RESPONSIBLE OFFICIALS: David A. Dattilo
Vice President, Sales and Service

Scott E. Fore
Vice President, Environment, Health
and Safety

FACILITY ADDRESS: Safety-Kleen Corp. (7-008-01)
2720 Girard NE
Albuquerque, NM 87107

TELEPHONE NUMBER: 505/884-2277

U.S. EPA I.D. NUMBER: NMD 000804294

GEOGRAPHIC LOCATION: 35 06' 44" N
106 38' 46" W

OWNER: Safety-Kleen Corp.

DATE OPERATIONS BEGAN: March 1, 1977

DESCRIPTION OF ACTIVITIES: This facility is an accumulation point for spent solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer and then returned to the Company's customers as product.

CONTINGENCY PLAN

ABSTRACT

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1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a drum which meets Department of Transportation(DOT) requirements(typically a 5, 16, or 30 gallon container. On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the drum of used solvent with one of clean product. Each sales representative performs about fifteen of these services per day, collecting the drums of used solvent on a route van.

At the end of each day, the solvent is transferred from the drums to a storage tank at the service center and drums of product are prepared for the next day's services. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the spent solvent at the service center. Two-thirds of the solvent used by Safety-Kleen customers has been reclaimed with the remainder being purchased from a vendor.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model. The used solvent is pumped (using a hand pump) from the customer owned machine to a container which meets DOT requirements by a Safety-Kleen sales representative. The waste solvent is

stored in the same manner as the waste cleaner solvent collected from our leased parts cleaner machines. The sales representative then refills the customer-owned machine with drummed Safety-Kleen mineral spirits solvent via the hand pump. The same analyses are performed on waste solvent from customer-owned machines as are down-leased parts cleaner machines.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container which meets DOT requirements(typically a 16-gallon drum) and containing a chlorinated solvents/cresylic acid blend. The spent solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse. Periodically, a box trailer truck is dispatched from a recycle center to deliver drums of fresh solvent and collect the drums of spent solvent for reclamation.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are drummed on the customer's premises and are periodically collected by a sales representative. The drummed waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. About 35% of this waste is returned to dry cleaners as usable product.

- (a) For bulk waste, significant discrepancies are variations of more than 10% in weight.
- (b) For batch waste, a significant discrepancy is any variation in piece count, such as a discrepancy of one drum in a truckload.
- (c) Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

1.1.3 Paint Waste Collection Service

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Wastes containing various thinners and paints are collected in containers which meet DOT requirements on the customer's premises. The sales representative collects these containers and stores them in an enclosed concrete flammable shelter which is separate from the office/warehouse. These wastes are periodically shipped to a reclaimer and the regenerated solvent is distributed to Safety-Kleen customers for use as product.

In accordance with 40 CFR 264.73, Safety-Kleen maintains a manifest system, an operating log, biennial reports and all other records required under these sections.

1.2.2 Waste Management Practices

The Albuquerque service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The underground storage tanks, drum storage areas, return and fill station, and the ignitable waste shelter all have secondary containment and the service center has the equipment necessary for employees to safely manage wastes on-site. Appendix C contains drawings of the waste management facilities.

Spent mineral spirits from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. Spent material is poured into the dumpsters in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill station has secondary containment in the form of a 20' x 14' 8" x 1' coated concrete equipped with a blind sump.

The underground double-walled tanks have been designed in accordance with NFPA standards and are constructed of carbon steel. Two tanks holding 12,000 gallons each are installed underground; one is for clean and one is for spent mineral spirits. Each tank is equipped with an audiovisual high level alarm.

The container storage areas in the warehouse are used only for the storage of (1) spent immersion cleaner and (2) dry cleaning wastes. The wastes are not mixed while on site and different wastes are segregated according to their contents. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes.

The drum storage area in the east side of the warehouse has secondary containment in the form of a six inch wide by four inch high steel reinforced concrete curb with a 12' x 2' x 2.5' (448.8 gallons) collection trench. No more than 2,592 gallons of spent solvents will be stored in this drum storage area at any time.

The drum storage in the west side of the warehouse has secondary containment in the form of a six inch wide by four inch high steel reinforced concrete slab with a 12'L x 1'9"W x 3'6"D (549.8 gallons) collection trench. No more than 3,456 gallons of spent solvent will be stored in this drum storage area at any given time.

Paint wastes will be placed in containers which meet DOT requirements at the customer's place of business and sediment from cleaning the dumpsters is placed containers which meet DOT requirements. These containers of ignitable wastes are palletized and stored in the enclosed masonry flammable shelter shown in Appendix C. This structure has secondary containment in the form of a coated concrete trench measuring 2' x 12' x 2'; no more than 1,092 gallons will be stored at any given time.

The containers will be stored in the configurations shown on the Floor Plans in Appendix C. Two feet of aisle space will be maintained and the drums will be stored no more than two high. Containers in the drum storage areas will be placed on pallets and moved with a forklift or pallet jack.

2.0 WASTE ANALYSIS PLAN

2.1 DESCRIPTION OF WASTES

Six types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. It should be noted that the solvents managed at this facility are only incompatible with strong oxidizers and reactive metals, none of which are present in the tanks, container storage areas, or the concrete sealant. The solvents are also compatible with one another. Analytical data for the wastes and specifications for the products are in Appendix D and qualitative descriptions follow.

2.1.1 Wastes Resulting From the Parts Washer Service

Spent mineral spirits from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. Containers of spent material are poured into a dumpster at the return and fill station which in turn empties into the tank. This waste handling method results in three types of mineral spirits waste:

- a. Spent mineral spirits solvent--The spent mineral spirits solvent is removed from the tank by a tanker truck on a scheduled basis. About 6,000-7,000 gallons are removed every two weeks. This waste is ignitable (D001) and TCLP toxic using the characteristic leaching procedures. (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.) In 1986, the Albuquerque service center shipped 85,000 gallons of spent solvent to the Safety-Kleen recycle center in Denton, Texas.

- b. Bottom sediment in the tank--Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A Safety-Kleen vacuum truck is used for this purpose and can collect up to 4,000 gallons of this waste for reclamation. The sediment is ignitable (D001) and TCLP toxic using the characteristic leaching procedures. (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.)
- c. Dumpster sediment--Sediment also accumulates in the bottom of the dumpsters in the return and fill station. This sediment is removed manually with a shovel, drummed and the drums are stacked two-high in the enclosed H-3 Flammable Storage Building, used to store containerized ignitable waste. The chemical composition of this waste is analogous to that of the bottom sediment from the tank. In 1986, about 1,500 gallons of this waste were shipped to Safety-Kleen's Denton, Texas recycle center for reclamation.

Immersion cleaner remains in the drum in which it was originally used until it is received at the recycle center. The old formula immersion cleaner contains chlorinated solvents (F002) and cresylic acid (F004). The new immersion cleaner formula is toxic using the characteristic leaching procedure D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043. In 1986, about 2,000 gallons of these solvents were shipped to the Denton, Texas recycle center for reclamation.

2.1.2 Wastes Resulting From the Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in drums which meet DOT requirements. The drums are then palletized, stacked two-high and placed in the drum storage area of the warehouse. While approximately 80 % of the dry cleaning solvent used is perchloroethylene (F002), and characteristic leaching procedure D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043, about 17 % is mineral spirits, (D001) and the remaining 3 % is trichloro-trifluoroethane (F002). Any ignitable (D001) dry cleaning waste collected will be stored in the H-3 Flammable Storage Building. In 1986, about 5,000 gallons of dry cleaning wastes were shipped to the Safety-Kleen recycle center in Denton, Texas.

2.1.3 Paint Wastes

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and is toxic using the characteristic leaching procedure D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042 and D043. The waste is collected in drums drums which meet DOT requirements at the customer's place of business and the containers are then palletized and stored in an enclosed concrete masonry shelter the H-3 Flammable Storage Building). It is anticipated that this facility will ship 14,300 gallons of paint waste to a reclaimer annually.

the suspect waste for flash-point and the presence of volatile organic compounds using a modified EPA 8010 method (GC analysis). The costs of any sampling and testing performed as a result of the waste failing to meet the acceptance criteria, will be borne by the customer.

If the laboratory analysis reveals that the sampled waste is not contaminated, Safety-Kleen will accept the waste from the customer.

If the laboratory confirms that the waste is contaminated, the generator will be responsible for securing an alternate means of disposal. In the event the generator does not contract with Safety-Kleen to arrange for the treatment or disposal of waste which is sampled and found to be contaminated, Safety-Kleen will provide the generator's State Agency that is authorized to implement the RCRA hazardous waste management program (or EPA if the RCRA program has not been delegated to the State) with the results of this additional quantitative testing.

b. Waste Specific Criteria

The following is a description of the specific acceptance criteria for each waste stream.

I. Spent Mineral Spirits Solvent

The acceptance criteria for determining by visual inspection whether spent mineral spirits solvent has been contaminated are volume, odor and color, the most significant of which is volume. Spent mineral spirits solvent is collected in drums which, meet DOT requirements. If the volume of waste in a given drum exceeds the specified level, the Safety-Kleen service representative will sample the waste for laboratory testing as described above, or will reject the waste.

In addition to the volume criterion, the odor of the spent solvent will clearly indicate whether the waste has been contaminated. Spent mineral spirits solvent has a very distinctive odor. The service representatives are expressly instructed not to deliberately sniff the waste. However, if the mineral spirits solvent has been contaminated the service representative would immediately notice a difference in the odor when he services the machine.

The spent mineral spirits solvent is also visually inspected for its color. Unused mineral spirits solvent has a greenish tint. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. Therefore, if the spent solvent does not appear to be green, brown, or black, the service representative will sample the waste for possible contamination as described above, or will reject the waste.

II. Immersion Cleaner

Safety-Kleen is currently in the process of reformulating its immersion cleaner. Safety-Kleen is currently in the process of reformulating its immersion cleaner. Safety-Kleen believes that the new immersion cleaner will not be a hazardous waste under the current hazardous waste regulations.

A. Existing Immersion Cleaner

The criteria for the inspection of spent immersion cleaner are volume, color and physical state. A sample will be tested for contamination following the procedures described above or the waste will be rejected.

Unused immersion cleaner is amber in color. As the solvent is used, it turns brown in color.

The more it is used, the darker brown it becomes, until it is almost black. Therefore, if

the spent immersion cleaner does not appear to be amber, brown or black, the service representative will either sample the waste for possible contamination as described above, or reject the drum of waste.

The drum of spent immersion cleaner should contain two phases, an aqueous phase and a solvent phase. The aqueous phase should compose approximately 20% of the total volume of waste. If the waste is not separated into phases, or if the aqueous phase is greater than 20%, the service representative will either sample the waste for possible contamination as described above, or will reject the waste.

B. New Immersion Cleaner

In the event the new immersion cleaner is determined to be a hazardous waste, the acceptance criteria and respective descriptions will be the same as those for the existing immersion cleaner, with the exception of the physical state criterion. The new immersion cleaner waste will not have phases, therefore, this criterion is not applicable.

c. Dry Cleaner Wastes

Dry cleaner wastes consist of spent filter cartridges, powder residue and still bottoms.

1. Spent Filter Cartridges

Spent Filter cartridges are placed in containers which meet DOT requirements. It is obvious to the service representative whether the items in the drums are filter cartridges.

The drums may also contain approximately one inch of liquid which should either be clear or have a light brownish tinge. If the amount of the liquid is greater than approximately one

there is any liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

The powder residue is also inspected for color and should appear to be grayish-black. If the residue is not grayish-black in color, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

III. Still Bottoms

The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is too thin or if there is more than one inch of free liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or will be rejected.

In addition to consistency, the still bottom waste is inspected for color. The waste should appear dark brown or black in color. If the waste is a different color, a service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

d. Paint Wastes

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste.

I. Lacquer Thinner Waste

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in containers which meet DOT requirements. The paint gun cleaning machine operates as a closed system. The solvent is pumped from a tube in a left hand container (facing the machine) through the machine into a right hand container. The tube in the left hand container extends exactly half way into the container. The left hand container starts with 5 gallons of clean solvent which will be pumped out as the machine is used to clean the spray guns. This process will continue until the left hand pail

3.3.2 Drum Storage

The slab, curbing and collection trenches for the drum storage areas in the warehouse are made of steel-reinforced concrete and the concrete has been poured so that no cracks or gaps exist between them. The curbing is four inches high and six inches wide and encompasses the storage area except where there is a trench. Steel grates cover the trench to facilitate the movement of drums across it. The concrete is coated with chemical-resistant epoxy and urethane so as to be impermeable. The solvents in storage are only incompatible with strong oxidizers and reactive metals, none of which are present in the base or sealants.

Ignitable wastes in containers are stored at least fifty (50) feet from the property line in the masonry flammable shelter. The secondary containment trench will be designed of coated concrete. An overhead door secures the shelter when drums are not being added to or removed from it.

3.3.3 Compatibility of Containers with their Contents and Each Other

The mineral spirits, immersion cleaner, dry cleaning waste and paint wastes are compatible with the drums in which they are stored; in fact, mineral spirits is sometimes used as a rust-preventive coating for steel. Immersion cleaner, mineral spirits, and paint waste are stored in steel drums.

Dry cleaning wastes are stored in containers which meet DOT requirements. The typically used polyethylene drums have been treated with fluorine gas to be resistant to dry cleaning solvents. Immersion cleaner and dry cleaner waste are never opened at the branch facility. Containers in the warehouse will be palletized to facilitate storage shipping. Since none of the wastes handled by Safety-Kleen react with steel or polyethylene, compatibility is assured.

3.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

- a. Pouring of drummed solvent into the dumpster--As contents of the drums are poured into the dumpster, solvent can splash out. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by a metal pan with a floor drain that empties into the storage tank. This design will contain this type of spill.

- b. Filling of drums with solvent product--A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with solvent. Leaking fittings, a damaged hose or carelessness could lead to the discharge of solvent outside of the drum. Manual emergency shut-off valves are on each hose, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.

PROPERTY DESCRIPTION: About 1.05 acres with the following structures:

- a. one building with offices and a warehouse with two areas for container storage;
- b. two underground double-walled storage tanks (one for product and one for spent solvent);
- c. one loading dock with a solvent return and fill station; and
- d. one enclosed shelter to be used for container storage.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT(GAL.)	MATERIAL TO BE STORED
Tank	12,000	* (D001)	Spent Mineral Spirits Solvent 1
Container Storage--east Warehouse	2,592	448.4	Spent Immersion Cleaner old formula (F002, F004) ¹ new formula (see 1) Dry Cleaning Waste (F002) ¹
Container Storage--West Warehouse	3,456	549.8 (F002, F004) (F002)	Spent Immersion Cleaner ¹ Dry Cleaning Waste ¹
Container Storage-- <u>Masonry Shelter</u>	1,092	1,122 (D001, F003, F005)	Paint Waste ¹ Dumpster Sediment (D001) ¹

* indicates double-walled tank
 1 D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042 and D043

PROPERTY DESCRIPTION: About 1.05 acres with the following structures:

- a. one building with offices and a warehouse with two areas for container storage;
- b. two underground double-walled storage tanks (one for product and one for spent solvent);
- c. one loading dock with a solvent return and fill station; and
- d. one enclosed shelter to be used for container storage.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT(GAL.)	MATERIAL TO BE STORED
Tank	12,000	* (D001)	Spent Mineral Spirits Solvent 1
Container Storage--east Warehouse	2,592	448.4 (F002)	Spent Immersion Cleaner (F002, F004) 1 Dry Cleaning Waste 1
Container Storage--West Warehouse	3,456	549.8 (F002)	Spent Immersion Cleaner (F002, F004) 1 Dry Cleaning Waste 1
Container Storage-- <u>Masonry Shelter</u>	1,092	1,122 (D001, F003, F005)	Paint Waste 1 Dumpster Sediment (D001, D006, D008) 1

* indicates double-walled tank

1 D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042 and D043

PREPAREDNESS AND PREVENTION PLAN

ABSTRACT

SECURITY MEASURES--The site is secured as follows:

- a. There is a chain link fence with three strands of barbed wire around the facility.
- b. Warning signs are posted at all entrances.
- c. Locks are on all entrances to the warehouse and on the metal shelter.
- d. Remote controls for all tank operations are inside the warehouse.
- e. There is outdoor lighting which is triggered during low-light hours of the day.

INSPECTION PROCEDURES: See Appendix E for a copy of the Facility Inspection Record.

REQUIRED EQUIPMENT--The emergency equipment requirement is met with the following:

- a. Internal communications will be by voice.
- b. Telephones are available in the office and the warehouse.
- c. Fire extinguishers are available next to three exits in the warehouse and at the masonry shelter for ignitable waste storage.
- d. Water is available from the city of Albuquerque.

3.0 PREPAREDNESS AND PREVENTION PLAN

3.1 SECURITY MEASURES

The facility is secured with a six-foot high chain link fence topped by three strands of razor wire which surrounds the entire facility. All access gates are locked when the facility is unoccupied and warning signs stating "Danger - Unauthorized Personnel Keep Out" which are visible from twenty-five feet are posted at the entrances. These warning signs are posted in both English and Spanish. An electronic entrance gate is located at the front of the facility which can automatically be opened and closed to allow trucks to enter and exit. In addition, outdoor lights are triggered during low-light hours of the day.

The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas. These warning signs are posted in both English and Spanish.

The tanks are inaccessible in that material can not be added to or removed from them without activating the pumps, the controls for which are inside the warehouse. The pumps are not activated unless mineral spirits product or waste is being added to or removed from the tanks by Safety-Kleen personnel. The container storage areas and flammable shelter area

are needed and assure that they are completed. If he can not carry out the repairs himself, he must notify the Technical Services Department at Safety-Kleen's corporate headquarters and request assistance. Completion of repairs must also be noted on the Facility Inspection Record.

The regional environmental engineer or regional manager must review the Facility Inspection Record with the branch manager at least three times per year to insure that they are properly completed and that any necessary repairs have been effected.

The facility inspection includes the following:

- a. Tank inspections--At a minimum, the tank holding the solvent product and that holding the spent solvent are inspected daily. The daily inspections include checks of the high level alarm and of the volume held in the tank and checks of the leak detection system for any releases. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. When the tank used to store spent solvent is 85% fill, a pickup must be scheduled with the Solvent Control Department in Safety-Kleen's corporate headquarters. The solvent must not exceed 95% of the tank volume at any time.
- b. Solvent dispensing equipment--The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks or leaks) and proper functioning on a daily basis. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked daily for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired.
- c. Drum storage areas--The three drum storage areas (including the paint waste shelter) are inspected daily and the number and condition of the drums noted. The total volume of the spent solvent held in the drum storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect drums must be placed in a drum

PURPOSE: This plan describes the proper action to be taken by employees during an emergency.

RESPONSIBILITIES: The emergency coordinator or his alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR: The branch manager is the emergency coordinator. The alternate emergency coordinator is trained employee designated to his position by the emergency coordinator.

EMERGENCY NOTIFICATIONS:

Albuquerque Police Department 911 or 505/768-1986

Albuquerque Fire Department 911 or 505/243-6601

Responding Station #8 505-888-8100

Presbyterian Hospital 505-841-1111

Environment, Health and Safety Dept. 708/888-4660

New Mexico Health and Environment Dept. 505/827-9329 (24 hrs.)

Rinchem 505/345-3655

or 505-883-4232(24

hour central security

4.0 CONTINGENCY PLAN

Safety-Kleen Corp. (7-008-01)
2720 Girard NE
Albuquerque, New Mexico 87107

4.1 PURPOSE

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or ground water.

The contingency plan is to be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment, implementing the procedures contained in this plan.

4.2 EMERGENCY COORDINATOR RESPONSIBILITIES

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or his alternate be unavailable. The branch manager is the emergency coordinator and the alternate emergency coordinator is a trained employee designated to this position by the emergency coordinator.

The emergency coordinator and his alternate must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office

EMERGENCY INFORMATION
ALBUQUERQUE, NEW MEXICO (7-008-01)

06-16-93

A. FACILITY EMERGENCY COORDINATOR

ALTERNATE COORDINATORS

RON STEPHENSON
135 MEADOW CREEK RD.
PO BOX 2740
EDGEWOOD, NM 87015

SCOTT GARISS
7420 VICKREY DR. N.E.
ALBUQ., NM 87109

GREG BEALL
9900 SPAIN N.E.
APT. S1101
ALBUQ., NM 87111

TELEPHONE: (Area Code 505)

OFFICE: 884-2277

884-2277

884-2277

HOME: 281-7792

821-6305

299-6747

MOBILE: 764-3809

PAGER: 766-4288

PAGER: 843-5495

B. EMERGENCY NOTIFICATION PHONE NUMBERS

a. INTERNAL

Safety Klean Environmental Affairs Department
24 HOUR EMERGENCY NUMBER:

708-888-4660

b. EXTERNAL

1. D.O.T. National Response Center

24 HOUR EMERGENCY NUMBER:

1-800-424-8802

2. New Mexico Health and Environmental Dept
Environmental Improvement Division
Hazardous & Radioactive Materials Bureau

505-827-9329

C. EMERGENCY TEAM TO BE NOTIFIED

<u>UNIT</u>	<u>TELEPHONE NUMBERS</u>
a. Albuq. Fire Department (Responding Station #19 4201 Manual N.E.)	911 or (Non Emer. 505-243-6601) 911 or (Non Emer. 505-888-8100)
b. Albuq. Police Department	911 or (Non Emer. 505-768-1986)
c. Presbyterian Hospital	505-841-1111 or (Non Emer. 505-841-1234)
d. Albuq. Industrial Medicine	505-842-5151
e. Rinchem (State's Emer. Response Team)	505-345-3655 or 505-883-4242 24 HOUR (Central Security)
f. Poison Control Center	505-843-2551
g. INTERNAL (BRANCH PAGING SYSTEM)	INSTRUCTIONS: PUSH INTERCOM BUTTON (Above Conference Button) THEN:
	6 for OUTSIDE SPEAKERS
	10 MANAGERS OFFICE
	11 B.I.M.'s OFFICE
	12 SALES REPS ROOM
	13 BRANCH SECRETARY
	14 B.F.M.'s OFFICE

EMPLOYEE POSITION FUNCTIONS DURING AN EMERGENCY

<u>Title</u>	<u>Emergency Function</u>
Branch Manager	Emergency Coordinator Notify Environmental Affairs Department Notify Emergency Agencies, if necessary
Alternate Emergency Coordinator: Any trained employee designated to this position by the emergency coordinator	Supervise Evacuation <u>Apply First Aid</u>
Sales Representatives	Retain, contain or slow the flow of solvent Shut off electricity, <u>secure building</u> <u>Gather Fire Extinguishers</u> <u>Gather Absorbents</u>
Branch Secretaries	<u>Apply First Aid</u> <u>Assist in Notifying Emergency Agencies</u>
Warehouseperson	<u>Gather Drums and Shovels</u>

disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Contaminated equipment resulting from remedial actions for spills must be cleaned and decontaminated. If it is a paved or metal surface, this can be done using a detergent solution.

Every spill must be recorded on the Field Spill Report Form (Appendix F) and reviewed with branch personnel to prevent similar spills from occurring in the future. A copy of this report is sent to the Environmental Affairs Department.

4.3.3 Fire Control Procedures

If a fire occurs, personnel must act quickly with the fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately, evacuate the facility and call the fire department.

Vapors of mineral spirits exposed to a spark or open flame can flash at temperatures over 105^oF. A mineral spirits fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a



SAFETY-KLEEN CORP.
File Environmental Incident Report Form

Report all spills to the Safety-Kleen Environment, Health and Safety Dept. immediately
(including spills, fires, DOT reportable releases, etc.).

1. Facility Number: _____ Facility Location: _____

2. Date of Incident: _____ Time: _____ a.m. p.m.

3. Reported By: _____

4. Location of Incident: _____

If not at S-K site, name and phone of contact person: _____

5. Material Involved: _____ Quantity: _____

6. Material Status: Clean Non-Hazardous Waste Hazardous Waste

7. Any injuries or property damage? Yes No If yes, explain: _____

8. Cause of Incident: (Explain in detail) _____

9. Describe incident in detail (including nearby surface water or sewer and distance, type of surface spilled on, was spill contained): _____

10. Describe actions taken to prevent recurrence: _____

11. Describe response/cleanup action taken and any material not recovered: _____

12. Cleanup Residue Volume: _____ Spill Kit Restocked? Yes No

13. Emergency Response Company Involved: _____ Phone # _____

14. Person(s) Involved in Incident: _____ Phone # _____

15. Vehicle #: _____ Company: _____

16. List Emergency Agencies at Scene (include names & phones): _____

17. Potential Public Exposure, Distance to Homes, Businesses, etc.: _____

18. Notification:	S-K EHS 1-708-888-4660	S-K Regional Env. Staff	Nat'l Response Center 1-800-424-8802	1-	State/Local - -
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Date/Time: _____

Contact Name: _____

Comments Rec'd: _____

Report Number: _____

19. Spill EPA ID # (if obtained): _____

20. Spill Residue Paperwork (check): Bill of Lading Manifest Spill: LDR

21. DOT Reports Required/Completed? Verbal: Yes No Written: Yes No

22. State Reports Required/Completed? Verbal: Yes No Written: Yes No

Signature of Preparer: _____ Date of Report: _____

After completing this form, file copy 1 in the Facility Incident (Spill) File at the facility, send copy 2 to the SK EHS Department in Elgin and copy 3 to the site's regional environmental staff.

INSPECTION LOG SHEET FOR:
Daily Inspection of CONTAINER STORAGE AREA
 (A separate log must be completed for each storage area.)

DESCRIPTION OF AREA (e.g., metal shelter, northeast corner of warehouse, etc.) _____

PERMITTED STORAGE VOLUME _____

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE (M/D/Y) / / / / /

TIME _____

CONTAINERS

	MON.	TUES.	WED.	THURS.	FRI.
Total Volume* of _____ ** waste:					
Total Volume of _____ ** waste:					
Total Volume of _____ ** waste:					
Total Volume of _____ ** waste:					
Total Volume of _____ :					
TOTAL VOLUME (IN GALLONS):					

A***N A N A N A N A N

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted, other: _____

Condition of Containers: A N A N A N A N A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion, other: _____

Stacking/Placement/Aisle Space: A N A N A N A N A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets, other: _____

CONTAINMENT

Curbing, Floor and Sump(s): A N A N A N A N A N

(Any material which spills, leaks or otherwise accumulates in the secondary containment must be **completely** removed within 24 hours of it being discovered.)

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant, other: _____

Loading/Unloading Area: A N A N A N A N A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* When calculating total volumes, assume the containers are full.

** Enter a short description of the waste (e.g., M.S., I.C., paint, etc.) _____

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

**INSPECTION LOG SHEET FOR:
Daily Inspection of STORAGE TANK SYSTEM**

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

MON. TUES. WED. THURS. FRI.

TRANSFER PUMPS AND HOSES

Pump Seals: A* N A N A N A N A N

If 'N', circle appropriate problem: leaks, other: _____

Motors: A N A N A N A N A N

If 'N', circle appropriate problem: overheating, other: _____

Fittings: A N A N A N A N A N

If 'N', circle appropriate problem: leaks, other: _____

Valves: A N A N A N A N A N

If 'N', circle appropriate problem: leaks, sticking, other: _____

Hose Connections and Fittings: A N A N A N A N A N

If 'N', circle appropriate problem: cracked, loose, leaks, other: _____

Hose Body: A N A N A N A N A N

If 'N', circle appropriate problem: crushed, thin spots, leaks, other: _____

RETURN AND FILL STATION

Wet Dumpster: A N A N A N A N A N

If 'N', circle appropriate problem: sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, other: _____

Secondary Containment: A N A N A N A N A N

If 'N', circle appropriate problem: sediment/liquid, leaks, deterioration, distortion, excess debris, other: _____

Loading/Unloading Area: A N A N A N A N A N

If 'N', circle appropriate problem: cracks, ponding/wet spots, deterioration, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

*A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

INSPECTION LOG SHEET FOR:
Daily Inspection of **TANK EQUIPMENT**

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE: (M / D / Y) _____

TIME _____

Pump, Flange, or Valve Number	MON.	TUES.	WED.	THURS.	FRI.	
1 _____	A**	N	A	N	A	N
2 _____	A	N	A	N	A	N
3 _____	A	N	A	N	A	N
4 _____	A	N	A	N	A	N
5 _____	A	N	A	N	A	N
6 _____	A	N	A	N	A	N
7 _____	A	N	A	N	A	N
8 _____	A	N	A	N	A	N
9 _____	A	N	A	N	A	N
10 _____	A	N	A	N	A	N
11 _____	A	N	A	N	A	N
12 _____	A	N	A	N	A	N
13 _____	A	N	A	N	A	N
14 _____	A	N	A	N	A	N
15 _____	A	N	A	N	A	N
16 _____	A	N	A	N	A	N
17 _____	A	N	A	N	A	N
18 _____	A	N	A	N	A	N
19 _____	A	N	A	N	A	N
20 _____	A	N	A	N	A	N
21 _____	A	N	A	N	A	N
22 _____	A	N	A	N	A	N
23 _____	A	N	A	N	A	N
24 _____	A	N	A	N	A	N
25 _____	A	N	A	N	A	N
26 _____	A	N	A	N	A	N
27 _____	A	N	A	N	A	N
28 _____	A	N	A	N	A	N
29 _____	A	N	A	N	A	N
30 _____	A	N	A	N	A	N
31 _____	A	N	A	N	A	N
32 _____	A	N	A	N	A	N
33 _____	A	N	A	N	A	N
34 _____	A	N	A	N	A	N
35 _____	A	N	A	N	A	N
36 _____	A	N	A	N	A	N
37 _____	A	N	A	N	A	N
38 _____	A	N	A	N	A	N
39 _____	A	N	A	N	A	N
40 _____	A	N	A	N	A	N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leak, active leak, sticking, wear, does not operate smoothly, other: _____

For all leaks and potential leaks, the Leak Detection and Repair Record must be completed.

*Add short descriptions of unit being inspected (e.g. gate valve, dumpster flange, dumpster pump, etc.)

**A = Acceptable N = Not Acceptable

Draw a line through valve and pump I.D. numbers which do not apply.

INSPECTION LOG SHEET FOR:
 Weekly Inspection of **SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES**
AND MISCELLANEOUS EQUIPMENT

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE: (SIGN ON THE DAY INSPECTION IS PERFORMED; PERFORM INSPECTION ON THE SAME DAY EVERY WEEK.)				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

_____/_____/_____
 DATE: (M / D / Y)

_____/_____/_____
 TIME

SAFETY AND EMERGENCY EQUIPMENT

Fire Extinguishers: A N
 If 'N', circle appropriate problem: overdue inspection, inadequately charged, inaccessible, other: _____

Eyewash and Shower: A N
 If 'N', circle appropriate problem: disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, other: _____

First Aid Kit: A N
 If 'N', circle appropriate problem: inadequate inventory, other: _____

Spill Cleanup Equipment: A N
 If 'N', circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other: _____

Personal Protection Equipment: A N
 If 'N', circle appropriate problem: inadequate supply of malfunctioning or inadequate aprons, gloves, glasses, respirators, emergency respirators, emergency respirator is missing components, items requiring security or clean environment are exposed to the environment, other: _____

Communication Devices: A N
 If 'N', circle appropriate problem: inadequate supply of telephones, malfunctioning telephone(s), malfunctioning intercom, emergency alarm does not work, telephones are not located where needed, other: _____

SECURITY DEVICES

Gates and Locks: A N
 If 'N', circle appropriate problem: sticking, corrosion, lack of warning signs, fit, other: _____

Fence: A N
 If 'N', circle appropriate problem: broken ties, corrosion, holes, distortion, other: _____

MISCELLANEOUS EQUIPMENT

Dry Dumpster: A N
 If 'N', circle appropriate problem: rust, corrosion, split seams, distortion, deterioration, excess debris, liquids in unit, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* A = Acceptable N = Not Acceptable
 (IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)
 FORM 1100-08-05

MODULE IV - TANKS

IV.A. MODULE HIGHLIGHTS

Spent mineral spirit solvents and sediments from Safety-Kleen customers will be stored in a double-walled underground storage tank with leak detection and a high-level alarm system. Ancillary equipment to the tank include the return and fill station where the spent mineral spirit solvents will be drained into the tank. Steel piping to the tank from the return and fill station is provided with secondary containment. Above-ground piping within the secondary containment of the Return and Fill Shelter are assembled with threaded joints, and underground piping will be double walled with leak detection provided. Fill pipes used during loading and unloading operations are secondarily contained. Capacity of the tank is 12,000 gallons although the high-level alarm system is set to sound when the tank is 600 gallons from being full.

IV.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

IV.B.1. The Permittee may store a maximum volume of 11,400 gallons of spent mineral spirit solvent in the double-walled tank designated as the waste storage tank, subject to the terms of this Permit and as follows:

<u>Tank No.</u>	<u>Allowed Volume</u>	<u>Dimensions of Tank</u>	<u>Secondary Containment</u>	<u>Waste</u>
Waste Tank	11,400	8.0 ft (diam) X 32.5 ft (length)	yes	organic <i>Doc I</i> solvents, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043