PROJECT: 23-02

CLOSURE CERTIFICATION REPORT
PARTIAL FACILITY CLOSURE
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD000804294

May 23, 1994

Prepared for:

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CLOSURE CERTIFICATION STATEMENT

PARTIAL FACILITY CLOSURE
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD00804294
May 23, 1994

The inactive hazardous waste management units (i.e., underground storage tank system, return/fill station, and associated equipment) at the facility described in this document have been closed in accordance with the approved partial closure plan.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Scott E. Fore — 5/27/94

Scott E. Fore, Vice President — Date
Safety-Kleen Corp.
Vice President, Environmental Health and Safety

John Ahern — May 23, 1994

John Ahern — Date
TriHydro Corporation
President

[signature] — 5/22/94

Jack G. Bedessem, Jr. — Date
TriHydro Corporation
Registered New Mexico Professional Engineer
Registration No. 12136

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CHAPTER 1.0

INTRODUCTION

Safety-Kleen Corp. (S-K) operates a branch service center at 2720 Girard NE, Albuquerque, New Mexico. The facility functions as a service center for distribution of mineral spirits, and storage of spent mineral spirits, other parts-cleaning solvents, spent dry cleaning waste, and paint waste. The service center is an integral part of a distribution/recycling network and does not include treatment or disposal facilities.

The New Mexico Environment Department (NMED) approved a partial facility closure plan for the inactive hazardous waste management units (HWMUs) in a letter dated May 7, 1993. A copy of this letter is included in Appendix A. S-K commenced closure of inactive HWMUs at the facility during the week of May 31, 1993. The inactive HWMUs (i.e., underground storage tank system for the storage of spent mineral spirits, return/fill station, and associated equipment) were removed from service following installation of a new UST system and return/fill station (March 1992).

S-K is also in the process of permanently closing an underground storage tank (UST) system which had been used for the product mineral spirits at the facility. The inactive product mineral spirits tank is not a HWMU; however, this UST system is being closed concurrently with and similarly to the HWMUs. The product mineral spirits tank is being closed in accordance with the applicable federal UST regulations (40 CFR 280.70 et seq.) and State of New Mexico UST regulations.

The HSWA conditions of the Facility Permit included requirements for a RCRA Facility Investigation. The primary objective of the RFI was to address potential subsurface degradation in the vicinity of an alleged spent mineral spirits sludge tank (SWMU No. 4). Therefore, the assessment activities associated with closure of the inactive HWMUs were also designed to satisfy the RFI requirements. The alleged sludge UST identified during a USEPA RCRA facility assessment was not encountered during decontamination and removal of the two 12,000-gallon USTs.

The inactive HWMUs and product UST system were decontaminated and removed during the week of July 26, 1993, and the closure assessment activities were conducted during the weeks of August 9, and 16, 1993. A closure progress report (dated October 28, 1993) was submitted to NMED and USEPA summarizing the following activities:

- Pre-closure Site Assessment Results;
- Product Mineral Spirits UST Decontamination and Removal;
- Spent Mineral Spirits UST and Return/Fill Station (HWMUs) Decontamination and Removal;
- Results of the Extent of Degradation Investigation; and
- Remedial Action Plan.

In the closure progress report, S-K documented that the soil degradation found in the vicinity of the USTs was due to a pipeline release from the product mineral spirits UST. The release from the product UST was reported to NMED and initially assessed in September 1991.

Upon review of the October 28, 1993, progress report and supporting documentation, NMED concurred (reference letter dated April 4, 1994, Appendix A) that subsurface degradation delineated during the pre-closure and additional assessment activities was due to the 1991 in-line break from the product UST system and not from the inactive HWMUs. NMED further stated in the April 4, 1994, letter that "[S-K] has completed hazardous waste closure activities for the hazardous waste underground storage tank through the removal and decontamination activities for the hazardous waste unit..." and requested that S-K submit a closure certification report for the inactive HWMUs.

As requested by NMED, this report documents and certifies that the closure of the inactive HWMUs was conducted in accordance with the NMED-approved plan. A summary of the closure activities associated with the former hazardous waste tank and return/fill station is presented in this report. The results of pre-closure (October 1991 and January-February 1992) and closure assessment activities (August 1993) conducted in the vicinity of USTs and return fill station are presented in the October 28, 1993, Closure Progress Report.

S-K understands that remediation of subsurface degradation associated with the former product tank release is outside the authority of the NMED/Hazardous and Radioactive Materials Bureau. Therefore, S-K intends to address subsurface impacts in the vicinity of the former tanks under 40 CFR Part 280. Additional assessment and remediation activities (if necessary) will be managed through the WMED UST Bureau.

1.1 Facility Identification

Name:	Safety-Kleen Corp. 7-008-01 Albuquerque Service Center
Location:	2720 Girard NE Albuquerque, NM 87101 Lat: 35° 06′ 44"N, Lon: 106° 36′ 46"W
EPA ID:	NMD000804294
Facility Operator:	Safety-Kleen Corp. 1000 N. Randall Road Elgin, IL 60123
Contact for Closure:	Joe Herrin Senior Project Manager - Remediation 1570 Industrial Drive Missouri City, TX 77459 (713) 261-2015
Facility Contact:	Bill Caballero, Branch Manager (505) 884-2277

1.2 Facility Description

The Albuquerque Service Center is located in Bernalillo County, New Mexico. A site location map is shown on Figure 1-1. The site is surrounded by light industrial, commercial, and business facilities. The site occupies an area of approximately 45,000 square feet and lies at an elevation of approximately 5,110 feet above sea level. The site is adjacent to a flood control canal located on the east side of the site.

A site plan showing the units undergoing closure is presented on Figure 1-2. The entire site is surrounded by a six-foot high security fence with lockable gates topped with three rows of bare wire and razor wire. The gates are locked after business hours. The units being closed are located in the south central part of the site and are described below.

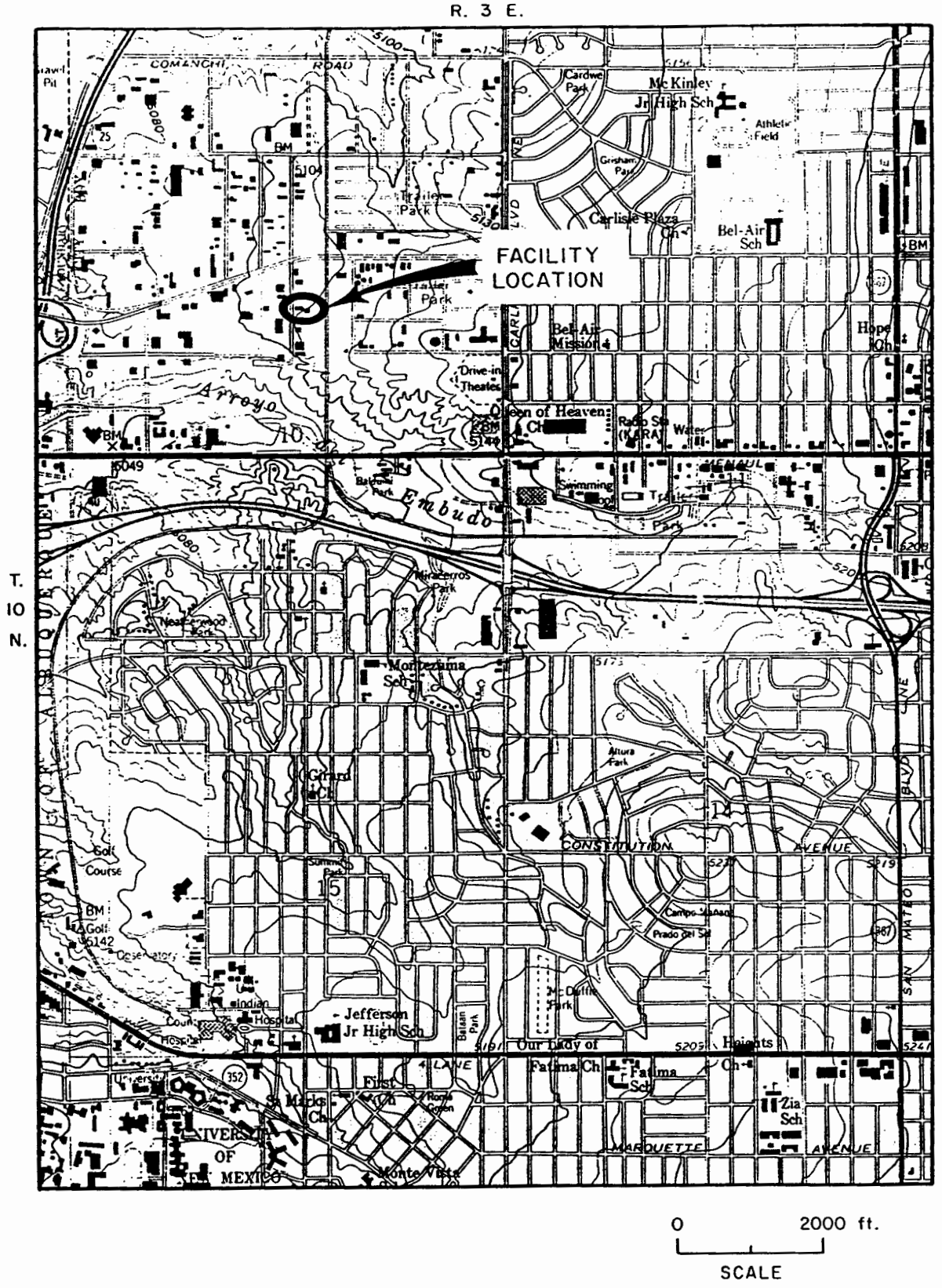


FIGURE 1-1 : FACILITY LOCATION, SAFETY-KLEEN CORP. SERVICE CENTER, ALBUQUERQUE, NEW MEXICO

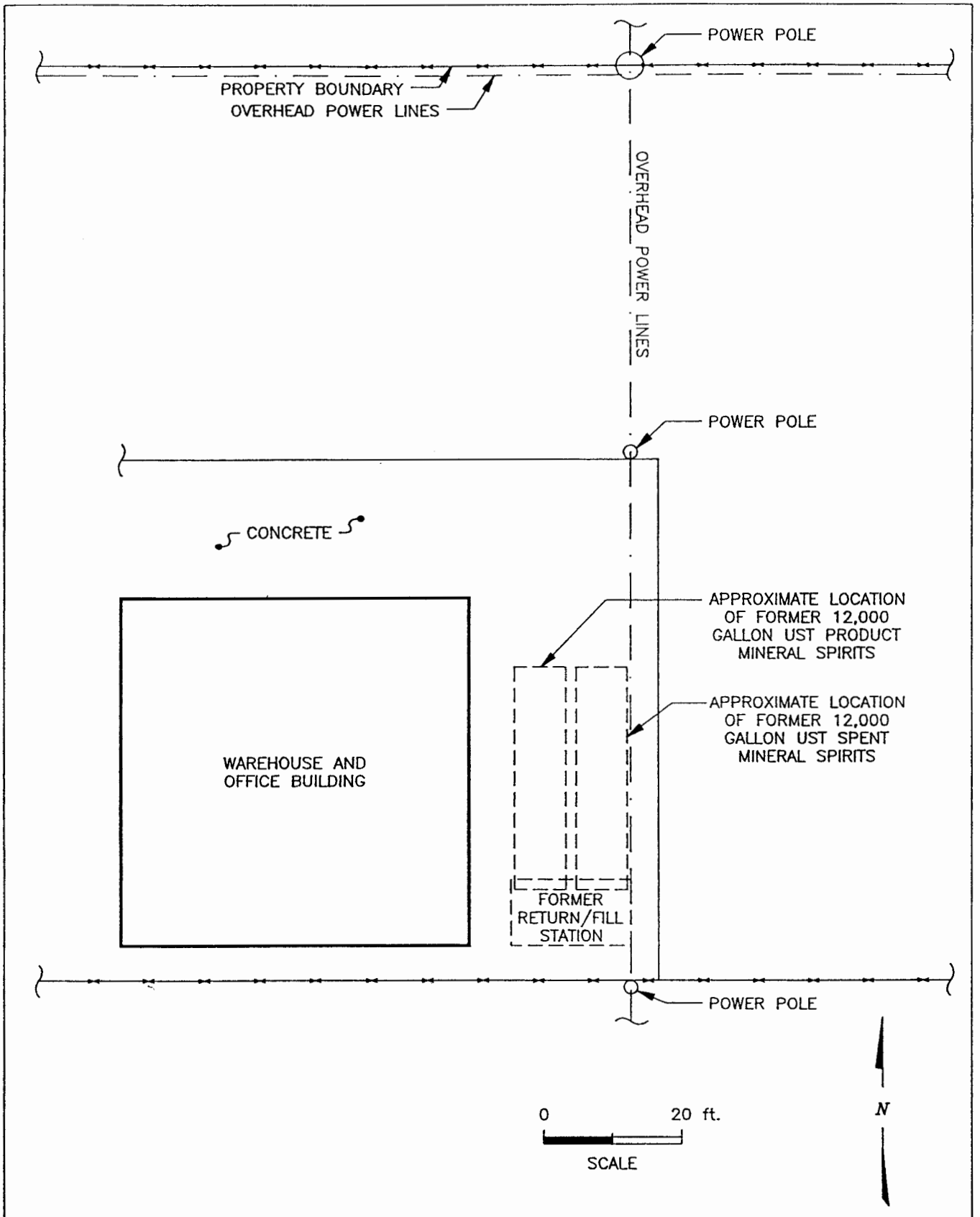


FIGURE 1–2 :SITE PLAN, SAFETY–KLEEN CORP. SERVICE CENTER, ALBUQUERQUE, NEW MEXICO

1.3 Hazardous Waste Management Units (HWMUs)

The HWMUs being closed at the Albuquerque Service Center in accordance with the NMED-approved closure plan include:

1. One 12,000-gallon steel UST for the storage of spent mineral spirits and sludge, associated piping, and appurtenances; and

2. A two-bay return and fill station with two wet dumpsters (capacity 375 gallons each).

1.4 Closure Activities

S-K submitted a partial facility closure plan for the Albuquerque Service Center in a document dated May 18, 1992 (Phase 1). S-K revised the closure plan to address decontamination/removal and RFI sampling under the potential sludge tank with a letter dated June 22, 1992 (Appendix A). In a letter dated May 7, 1993, NMED approved the closure plan with conditions (Appendix A). A 180-day closure period subsequently commenced on May 14, 1993.

S-K commenced closure of the inactive HWMUs on May 31, 1993, with pre-excavation soil sampling, analysis, and characterization. The two USTs and return/fill station were decontaminated/removed, and approximately 160 cubic yards of degraded soils were excavated during the week of July 26, 1993. The Phase 2 closure activities are summarized in Chapter 2.0.

In response to a release from the product mineral spirits UST piping, S-K conducted pre-closure site assessment activities in October 1991 and January-February 1992. These assessment results were presented in an "Onsite Investigation Report" (Delta Environmental Consultants Inc., 1991) and the "Results of Additional Activities" (TriHydro Corporation, 1992). The results are also summarized in the October 1993 progress report. Following closure of the inactive HWMUs, S-K conducted additional assessment activities to further define the extent of soil degradation associated with the 1991 release (Phase 3). The results of the closure assessment activities are described in the Closure Progress Report (October 28, 1993).

The extent of soil quality degradation was defined during the August 1993 assessment activities. The results of these assessment activities indicated soil quality degradation does not extend to ground water. S-K will work with the NMED UST

Bureau to address degraded soils remaining in the vicinity of the former USTs. A proposed plan for remediation (if necessary) was presented in the October 1993 Closure Progress Report (Phase 4).

CHAPTER 2.0

USTs AND RETURN/FILL STATION DECONTAMINATION AND REMOVAL (PHASE 2)

S-K completed decontamination and removal of the two inactive USTs and former return/fill station at the Albuquerque service center during the week of July 26, 1993. The closure activities were performed by Reidel Environmental Services (RES) of Denver, Colorado, under the direction of a TriHydro Corporation professional engineer, staff engineer, and a S-K representative. The decontamination and removal activities were performed in accordance with the NMED-approved closure plan and modifications.

The purpose of this chapter is to summarize the results of Phase 2 (Return/Fill Station and UST System Decontamination) activities as described in the approved facility closure plan. Information in this chapter satisfies the requirements of the Phase 2 progress report (Activity 2.9). The principal activities performed under Phase 2 include:

1. Pre-excavation soil sampling and analytical characterization;

2. Decontamination and removal of the spent mineral spirits and product mineral spirits USTs;

3. Dismantling and decontamination of the former return/fill station; and

4. Sampling of soils from the UST excavation.

This chapter focuses on closure of the former hazardous waste tank and return/fill station. A description of closure activities associated with the product tank is presented in the October 1993 report.

As discussed in Chapter 1.0, the potential presence of a small spent mineral spirits sludge tank was identified by USEPA in the RCRA Facility Assessment. If present, this small sludge tank should have been located near the two 12,000-gallon USTs. During the USTs and return/fill station decontamination and removal in July 1993, this alleged tank was not discovered at the site. In a letter dated January 25, 1994 (Appendix A), USEPA acknowledged concurrence with the proposal for no further action regarding the alleged sludge tank and requested a Class III modification to remove this unit from the permit.

2.1 Pre-Excavation Soil Sampling and Characterization

The results of the pre-closure assessment activities (October 28, 1993, Closure Progress Report) indicated soils in the vicinity of the USTs did not exhibit the characteristics of hazardous waste. During the week of May 31, 1993, S-K collected additional samples in the vicinity of the USTs to confirm the characteristics and address NMED conditions of the closure plan approval. Data generated from the pre-excavation sampling and analysis were also used to profile the soils and obtain Waste Management of New Mexico approval for disposal.

Six testholes were constructed adjacent to the USTs and return/fill station to collect representative samples of soils to be excavated during removal. Soil samples were collected from each testhole between ground surface and a depth of three feet. The soils were composited into one representative sample and submitted to GTEL Laboratory (Wichita, Kansas) for analysis of the following:

Toxicity Characteristic Leaching Procedure (40 CFR 261.24)

- Volatile organic compounds (11)
- Semi-Volatile organic compounds (12)
- Metals (8)

Ignitability (Closed Cup, ASTM D-93 modified)

Volatile Organic Compounds (SW-846 Method 8240)

Total Metals (Cadmium, Chromium, Lead)

TPH as Mineral Spirits (ASTM D3328 modified)

Data generated during the pre-excavation sampling program confirm the soils in the vicinity of the USTs and return/fill station did not exhibit the characteristics of hazardous waste. Subsequently, Waste Management of New Mexico approved disposal of the soils at the Rio Rancho Landfill. Copies of the Waste Profile Sheet and laboratory data reports are included in Appendix B.

2.2 Decontamination and Removal of USTs

UST decontamination and removal were conducted in accordance with the approved closure plan and applicable local

regulations. Removal and decontamination of the spent solvent tank included the following activities:

1. Removal and management of tank contents;

2. UST system excavation and entry;

3. UST system decontamination;

4. Removal and disposal of UST systems; and

5. Excavation sampling and soil management.

Site work commenced on July 26, 1993 with a health and safety meeting. Strict health and safety protocol was adhered to throughout the project, and all applicable regulations (40 CFR parts 265 and 280) and guidelines (e.g. API, OSHA, NIOSH and NFPA) were followed during UST decontamination/removal.

2.2.1 Removal and Management of UST Contents

The 12,000-gallon spent mineral spirits UST system was removed from service in March 1992 following installation of a new UST system. During the interim period, S-K removed as much liquid and sludges from the USTs as possible to minimize the potential for release. The residual contents of the USTs were evacuated and containerized prior to tank removal.

The spent mineral spirits tank contained approximately 35 gallons of liquids and sludge prior to cleaning. The evacuated materials were transferred to the new spent mineral spirits management system at the Albuquerque service center. Subsequently, the residual contents were managed as hazardous waste and transferred to the S-K recycle center in Denton, Texas (permitted TSD facility) for processing.

2.2.2 UST Systems Excavation and Entry

Approximately 160 cubic yards of soil and concrete were excavated and removed from the site during the closure activities. Concrete overlying the USTs was visually inspected by the onsite engineer for areas of staining, residue build-up and any other material. Following a determination that the concrete was acceptable for landfill disposal, it was broken up and stockpiled at the site. Approximately 40 cubic yards of concrete was hauled to the landfill.

Soil (approximately 120 cubic yards) overlying and adjacent to the tanks was excavated to facilitate access to and removal of the tanks. The soil and concrete were stockpiled on visquene within the secured S-K facility boundary and

covered with visquene to prevent runoff due to possible precipitation. The excavated material was transported to Waste Management Landfill in Rio Rancho, New Mexico, for disposal. Copies of the Bills of Lading are included in Appendix C.

2.2.3 UST Systems Decontamination

Appurtenances associated with the UST systems included piping, pumps and distribution hoses and nozzles. Prior to being disconnected from the USTs, all appurtenances were flushed with a high-pressure soap and water solution, and then triple rinsed with water. All rinsate solution was collected in the USTs.

The 12,000-gallon UST was washed with a high pressure detergent water mixture and then scraped to remove any rust and/or scale. The tank interior was then triple rinsed with clean water. UST decontamination generated approximately 100 gallons of rinsate solution. All rinsate solution was collected and disposed as hazardous waste through the S-K spent mineral spirits management system.

An aliquot of the final rinse solution was collected and allowed to equilibrate to ambient temperature. Headspace analysis of the rinsate solution with a photoionization detector (PID) indicated 1.2 ppm for the spent mineral spirits tank. Background readings fluctuated between 0.6 and 1.0 ppm. The field screening results and visual inspection indicated the tank, piping, and appurtenances were clean and suitable for transport and disposal as scrap metal (40 CFR 261.6).

2.2.4 Removal and Disposal of UST System

Following decontamination, the spent mineral spirits tank was removed on July 28, 1993. Mr. Mark Coffman of the New Mexico Environment Department (NMED) Underground Storage Tank Bureau and Mr. Steve Villescas of the City of Albuquerque Fire Marshal Office were onsite during removal of the USTs. Once removed, the USTs were visually inspected by the engineer and the condition documented with photographs. The spent mineral spirits tank system had no visible holes.

The tank was rendered unusable by creating large holes in the sides of the UST with the teeth on the backhoe bucket. The contractor (RES) arranged for disposal of the tank, piping and appurtenances at a local metal recycling scrap yard (Acme Recycling, Albuquerque, New Mexico). A certificate of destruction was provided by the contractor and is included in Appendix D.

2.3 Excavation Soil Sampling

After removal of the USTs, soil samples were obtained from the excavation to assess the extent and degree of subsurface degradation. Eight soil samples were collected from the excavation in accordance with the approved closure plan and modifications. The excavation soil sampling locations are shown on Figure 2-1. The excavation soil samples were collected a minimum of 24 inches into the soils surrounding the USTs excavation using a backhoe bucket. The samples were placed into laboratory prepared containers and immediately packed on ice in an opaque cooler.

The soil samples were submitted to GTEL Laboratories, Inc. (Wichita, Kansas) for analysis of mineral spirits (8015/ASTM D3328 modified), volatile organic compounds (VOCs - 8240), and metals (6010 - cadmium, chromium, and lead). The analyses were performed in accordance with USEPA SW-846 methods or equivalent. The analytical results are summarized in tables 2-1 and 2-2, and Figure 2-1. The laboratory data sheets and chain-of-custody/sample-analysis-request forms are included in Appendix E. The results are discussed in the following sections.

2.3.1 Volatile Organic Compounds

VOCs were analyzed in accordance with USEPA Method 8240. Thirty-eight VOCs are on the list of analytes. VOCs were detected in three of the eight soil samples (PTBS, STBS, SW) collected from the UST excavation. The compounds detected in one or more of these samples included:

Acetone

1,1-Dichloroethane

1,2-Dichloroethane (total)

1,1,1-Trichloroethane

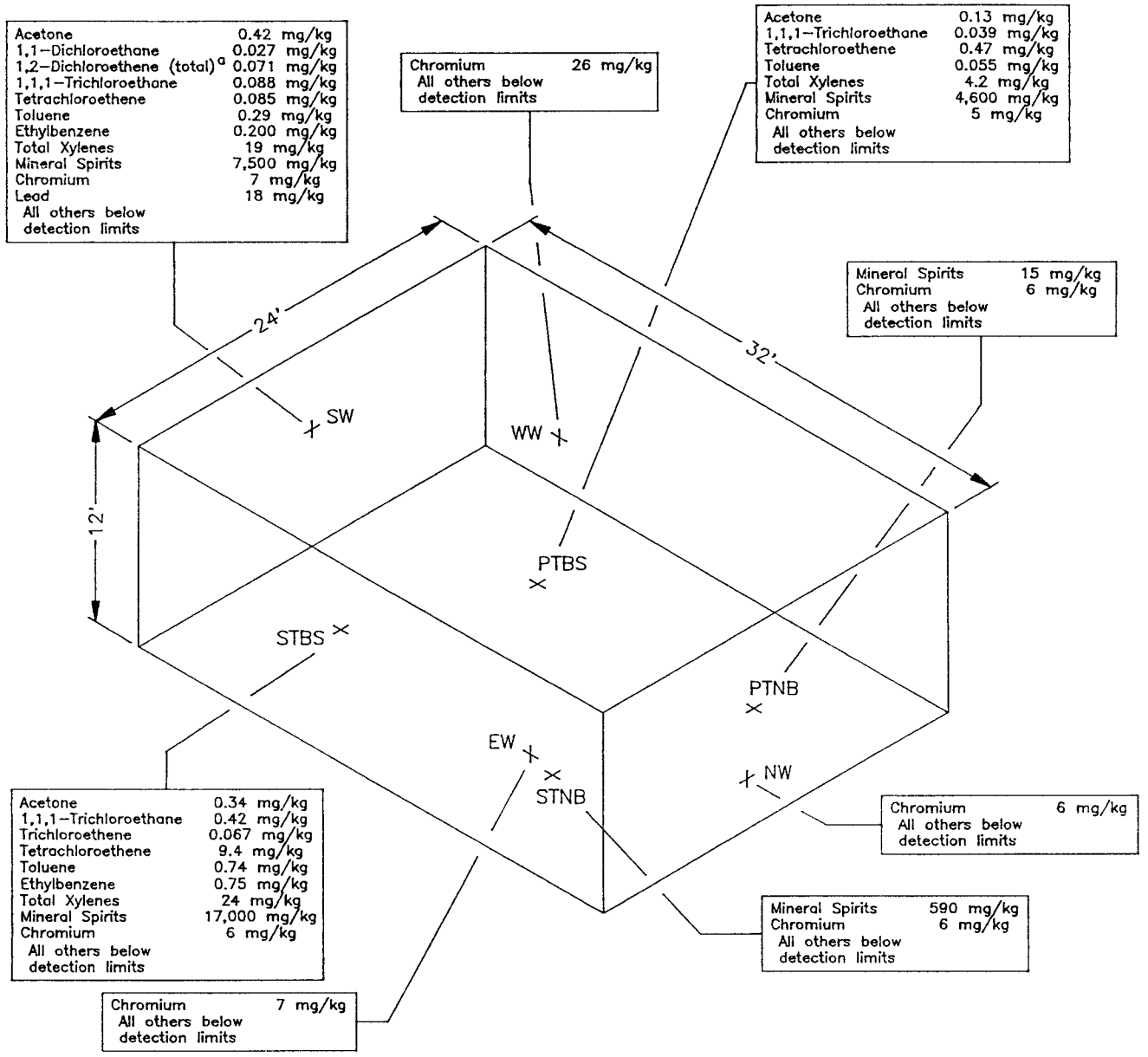
Trichloroethene

Tetrachloroethene

Toluene

Ethylbenzene

Total xylenes



NOTES: Reference laboratory data reports regarding mineral spirits analytical results

[a] total 1,2-dichloroethene is the sum of the cis- and trans- isomers.

FIGURE 2-1 :SOIL SAMPLING RESULTS, UST EXCAVATION, SAFETY-KLEEN CORP. SERVICE CENTER, ALBUQUERQUE, NEW MEXICO (July 1993)

SKANTOM1

Table 2-1. UST Excavation Soil Quality Data, Organic Constituents, Safety-Kleen Corp. Service Center, Albuquerque, New Mexico (July 1993).

Sample Identification	Mineral Spirits (mg/kg)[a]	Volatile Organic Compounds (mg/kg)									
		Acetone	1,1-Dichloroethane	1,2-Dichloroethene (total)[b]	1,1,1-Trichloroethane	Trichloroethene	Tetrachloroethene	Toluene	Ethylbenzene	Total Xylenes	All Others
PTNB	15	ND(0.020)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND
STNB	590	ND(0.020)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND
PTBS	4600	0.13	ND(0.015)	ND(0.015)	0.039	ND(0.015)	0.47	0.055	ND(0.015)	4.2	ND
STBS	17000	0.34	ND(0.025)	ND(0.025)	0.42	0.067	9.4	0.74	0.75	24	ND
EW	ND(10)	ND(0.020)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND
SW	7500	0.42	0.027	0.071	0.088	ND(0.025)	0.085	0.29	0.20	19	ND
WW	ND(10)	ND(0.020)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND
NW	ND(10)	ND(0.020)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND(0.005)	ND

Notes: [a] Reference laboratory data reports regarding analytical results.

[b] Total 1,2-dichloroethene is the sum of the cis- and trans- isomers.

ND - Constituent not detected above analytical limits in parentheses.

Table 2-2. UST Excavation Soil Quality Data, Inorganic Constituents, Safety-Kleen Corp. Service Center, Albuquerque, New Mexico (July 1993).

Sample Identification	Cadmium (mg/kg)	Chromium (mg/kg)	Lead (mg/kg)
PTNB	ND(0.5)	6	ND(10)
STNB	ND(0.5)	6	ND(10)
PTBS	ND(0.5)	5	ND(10)
STBS	ND(0.5)	6	ND(10)
EW	ND(0.5)	7	ND(10)
SW	ND(0.5)	7	18
WW	ND(0.5)	26	ND(10)
NW	ND(0.5)	6	ND (10)

ND - Constituent not detected above analytical limits in parentheses

S-K is suspicious of the presence of acetone as a facility-related compound. Acetone is not a typical constituent associated with S-K operations and is a common laboratory solvent.

2.3.2 Mineral Spirits

Mineral spirits was analyzed by modified EPA method 8015. Five of the eight excavation soil samples (PTNB, STNB, PTBS, STBS, and SW) contained mineral spirits at concentrations ranging from 15 mg/kg to 17,000 mg/kg. The elevated concentrations of mineral spirits were primarily in the bottom and southern part of the excavation and are believed to be associated with the product tank system in-line leak reported to NMED in September 1991.

2.3.3 Inorganic Constituents

Cadmium was not detected (ND) above the analytical detection limit (0.5 mg/kg) in any of the soil samples. Lead was detected in sample SW at a concentration of 18 mg/kg. All of the other samples were below the lead detection limit of 10 mg/kg. Chromium was detected in all soil samples at concentrations ranging from 5 to 26 mg/kg. USGS Open File Report 81-197 (Chemical Analysis of Soils and Other Surficial Materials of the Conterminous United States, Boerngan and Shacklette, 1981) reports background concentrations of these detected metals in New Mexico as:

Chromium: 5 to 500 mg/kg.

Lead: ND to 70 mg/kg.

2.4 Decontamination and Dismantling of Return/Fill Station

The major components of the former return/fill station were two drum washers, associated pumps and piping, steel floor grating, and the wooden structure. The western half of the return/fill station had been previously dismantled and stockpiled at the site. Activities conducted during closure of the structure included:

1. Decontamination, dismantling and disposal as scrap of the grating, dock, piping and other appurtenances.

2. Decontamination, dismantling and sampling of the wooden shelter components.

2.4.1 Decontamination and Disposal of Steel Components

The components of the return/fill station were decontaminated and disposed of in accordance with the approved closure plan. These components included the grating, dock support structures, hard piping and hoses. The steel components were decontaminated with high-pressure water spray until there was no evidence of residue or scale. Once each section of steel was washed to the satisfaction of the TriHydro Corporation engineer, it was removed from the structure and stockpiled for disposal as scrap. All rinsate solution was collected and disposed of through the S-K spent mineral spirits management system.

Hard piping, hoses and appurtenances were flushed with the high-pressure spray and washed on the outside to the satisfaction of the engineer. These components were then cut into manageable lengths and stockpiled for disposal as scrap. The decontaminated scrap metal was transported to Acme Recycling (Albuquerque, New Mexico) along with the USTs.

2.4.2 Decontamination of Wooden Structure

Wooden components of the return/fill station structure were decontaminated with high-pressure spray and stockpiled at the site. A representative sample of the decontaminated wood components was collected to characterize the waste for disposal. The sample was submitted to GTEL Laboratory (Wichita, Kansas) for analysis of VOCs, semi-VOCs, and metals by TCLP (40 CFR 261.24) and ignitability.

Stockpiled segments of the structure were placed on visquene inside the secured boundaries of the site. A visquene cover was placed over the wood and held in place with duct tape. Following receipt of the laboratory data (Appendix F), the wood was disposed of at the Waste Management of New Mexico Rio Rancho Landfill.

2.4.3 Concrete Containment Area

The concrete secondary containment area under the return/fill station was washed with high-pressure water spray until no residue was visible. Areas that were stained were washed several times with the high-pressure spray until cleaned to the satisfaction of the engineer. Rinsate was collected and disposed of through the S-K spent mineral spirits management system.

The concrete containment area was inspected for cracks and piping. All remaining pipes which entered the former re-

turn/fill station were plugged with concrete grout. No cracks were observed in the concrete.

2.5 Disposal of Personal Protective Equipment

All non-reusable personal protective equipment (coveralls, gloves, etc.) was placed into 16-gallon drums at the site. The drums were managed as hazardous waste and shipped to the S-K recycle center in Denton, Texas (permitted TSD), for disposal.

CHAPTER 3.0

CLOSURE CERTIFICATION AND FUTURE CORRECTIVE ACTION

As described in the previous chapters, the following activities have been completed in accordance with the approved partial facility closure plan:

1. The inactive HWMUs (spent mineral spirits UST and appurtenances, and the return/fill station) were properly decontaminated, removed and disposed of in July 1993 (Chapter 2).

2. The former product mineral spirits UST was properly decontaminated, dismantled, and disposed of in July 1993 (October 28, 1993, Closure Progress Report).

3. Additional soil assessment activities confirmed that soil impacts are associated with the September 1991 product tank system release (October 28, 1993, Closure Progress Report).

4. Additional soil assessment activities defined the extent of subsurface impacts associated with the September 1991 release (October 28, 1993, Closure Progress Report).

5. RFI assessment activities confirmed that the sludge tank reported in the USEPA RCRA Facility assessment was not present at the site (October 28, 1993, Closure Progress Report).

S-K will work with the NMED UST Bureau to address remaining subsurface impacts associated with the September 1991 product tank system leak. In the October 28, 1993 Closure Progress Report, S-K presented a remediation workplan to remediate soil impacts using a soil vapor extraction system, if necessary.

APPENDIX A

PERTINENT CORRESPONDENCE

CLOSURE CERTIFICATION REPORT
PARTIAL FACILITY CLOSURE
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD 000804294

- PARTIAL CLOSURE PLAN REVISION AND RFI WORKPLAN, DATED JUNE 22, 1992
- RFI WORKPLAN APPROVAL, DATED JULY 28, 1992
- NMED CLOSURE PLAN APPROVAL LETTER, DATED MAY 7, 1993
- USEPA APPROVAL OF RFI REPORT AND REQUEST FOR PERMIT MODIFICATION, DATED JANUARY 25, 1994
- CLOSURE CERTIFICATION REPORT REQUEST, DATED APRIL 4, 1994

safety-kleen.

June 22, 1992

Mr. Allyn Davis
Hazardous Waste Management Division
USEPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

and

Dr. Herb Grover
Hazardous and Radioactive Materials Division
New Mexico Environment Division
Harold Runnels Building
1190 St. Francis Drive
Santa Fe, NM 87502

Re: Partial Facility Closure and RCRA Facility Investigation, Safety-Kleen Corp. Service Center, 2720 Girard NE, Albuquerque, New Mexico (NMD 000804294)

Dear Sirs:

The HSWA permit conditions for the above-referenced facility requested that a RCRA Facility Investigation (RFI) workplan be prepared to address potential subsurface degradation in the vicinity of a spent solvent sludge tank (SWMU #4). In response to this request, Safety-Kleen Corp. (S-K) submitted a letter dated April 24, 1992, along with copies of the following assessment reports: (1) Onsite Investigation Report, dated November 4, 1991; and (2) Results of Additional Assessment Activities, dated April 14, 1992. These assessment reports, in conjunction with the May 18, 1992, Closure Plan were submitted to USEPA to address the requirements for an RFI workplan.

The partial facility Closure Plan was prepared to address closure of the interim status single wall underground storage tank system (USTs) and old return/fill station. The May 18, 1992, Closure Plan is currently under review by the New Mexico Environment Division (NMED). S-K intends to implement the partial facility Closure Plan and associated assessment activities following agency approval.

[illegible] TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708/697-8460 FAX 708/697-4295

In a letter dated May 21, 1992, the USEPA Region 6 requested that soil samples be collected at discrete intervals to depths of at least 10 feet below the bottom of the spent solvent sludge tank and associated piping. S-K proposes to perform the required sampling and analysis as part of Phase 3 (Additional Assessment Activities) of the interim status Closure Plan. At least one soil boring/test pit will be constructed to sample soils underlying former location of the old spent solvent sludge tank. Soil sampling and analysis will be performed in accordance with the procedures described under Activity 3.1 of the May 18, 1992 Closure Plan and USEPA letter dated May 21, 1992.

The partial facility Closure Plan focuses on the interim status return/fill station and 10,000 gallon spent mineral spirits UST because S-K records are unclear as to the status (absence/presence) of the old spent solvent sludge tank. In the event that the old sludge tank is present, S-K will close the unit during implementation of the proposed partial facility closure activities. The old sludge tank (SWMU #4) will be managed in the same manner as the 10,000 gallon spent mineral spirits UST (Phases 1 through 3 of the Closure Plan).

S-K requests that this letter be considered an addendum to the May 18, 1992, partial facility Closure Plan, and therefore satisfy the RFI workplan requirements. If you have any questions, please feel free to contact me at 310-831-3903.

Sincerely,
SAFETY-KLEEN CORP.

Anne Lunt
Senior Project Manager - Remediation

ahj/502

cc: Gary Long
Bob Wachsmuth
Ralph Ondatje

561

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

JUN 30 1992

received 7/8/92 aj

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Anne Lunt
Sr. Project Manager-Remediation
Safety-Kleen
P.O. Box 1429
San Pedro, California 90733

RE: RCRA Facility Investigation (RFI) Workplan Approval for Safety-Kleen in Albuquerque, New Mexico (NMD000804294)

Dear Ms. Lunt:

We hereby approve your RCRA Facility Investigation Workplan for the underground storage tank (SWMU No. 4). The approved RFI Workplan consists of the May 18 and June 22, 1992 submittals. Enclosed is a copy of the RCRA Facility Assessment, which you requested.

The RFI Report for the underground storage tank is due January 2, 1993. If you have any questions concerning this matter, please contact Rich Mayer of my staff at (214) 655-6775.

Sincerely yours,

WK Hamb

Allyn M. Davis, Director
Hazardous Waste Management Division (6H)

cc: Kathy Sisneros, NMED

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1

To Joe Herrin	From Anne Lunt
Co.	Co.
Dept.	Phone #
Fax #	Fax #

#714

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

BRUCE KING
GOVERNOR

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 7, 1993

Joe Herrin, Senior Project Manager
Remediation
Safety-Kleen Corp.
17629 El Camino Real, Suite 400
Houston, Texas 77058

RE: Response to Public Comments and Closure Plan Approval

Dear Mr. Herrin:

The New Mexico Environment Department (NMED) hereby approves the final closure plan for Safety-Kleen Corp. Service Center 2720 Girard NE, Albuquerque, New Mexico (NMD000804294) dated May 18, 1992, with the enclosed Conditions for Closure Plan Approval. The Conditions for Closure Plan Approval is an addendum to the closure plan dated May 18, 1992. The approved plan is for closure of an underground storage tank system located at your Albuquerque facility.

On March 26, 1993, the Hazardous and Radioactive Materials Bureau (HRMB) of the NMED released the proposed closure plan for public notice. The closure plan issued for public comment included draft Conditions for Closure Plan Approval proposed by the HRMB. The HRMB received comments on the proposed closure plan during the public comment period which ended on April 26, 1993. Enclosed is NMED's Response to Comments.

The effective date of the NMED closure plan approval is May 14, 1993. This is the date that the HRMB will begin tracking Safety-Kleen's compliance with the schedule on page VII-2, Figure VII-1 of the approved closure plan. Safety-Kleen shall complete all closure activities and submit the closure certification to NMED by November 10, 1993, unless Safety-Kleen demonstrates to NMED, at least by October 11, 1993, that closure activities will, of necessity, take longer than 180 days to complete.

Please contact Barbara Hoditschek or Marc Sides of my staff at (505) 827-4308 if you have any questions.

Sincerely,

Kathleen M. Sisneros, Director
Water and Waste Management Division

Enclosures

cc: Benito Garcia, HRMB
Barbara Hoditschek, HRMB
Marc Sides, HRMB
Bob Wachsmuth, Safety-Kleen
Jack Bedessem, Safety-Kleen
Dan Vigil, NMED District I Office
David Neleigh, EPA
File - Red

CONDITIONS FOR CLOSURE PLAN APPROVAL

SAFETY-KLEEN CORP. SERVICE CENTER CLOSURE PLAN
ALBUQUERQUE, NEW MEXICO
DATED MAY 18, 1992

The following Conditions for Closure Plan Approval is an addendum to the Closure Plan Safety-Kleen Corp. Service Center 2720 Girard NE, Albuquerque, New Mexico (NMD000804294) dated May 18, 1992. These conditions take precedence over any less stringent or conflicting requirements found in the above referenced document.

Page #III-7, first paragraph:

1. 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.

Page #III-7, paragraph 5:

2. 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.

Page III-11, third paragraph:

3. Contaminated soils and concrete that are excavated during closure are subject to HWMR-7, Part VI, Section 40 CFR 265.117(a) and shall be managed and disposed of properly as non-hazardous or hazardous waste. Safety-Kleen shall notify NMED of any materials excavated and allow NMED the opportunity to collect all samples that NMED deems appropriate to confirm the nature of the waste.

Page III-12, second paragraph:

4. 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.

Page III-12, third paragraph:

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

Page III-13:

6. 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).

Page III-13, fourth paragraph:

7. A closure plan amendment request will be prepared and submitted to the NMED within 60 days of completion of Phase 3 sample collection or by November 10, 1993, whichever is later. 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.

Page III-14, Activity 2.9:

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

Page IV-2, third paragraph:

9. 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.

Page IV-4, second paragraph:

10. The Phase 3 assessment report shall be submitted to NMED within 60 days after Phase 3 samples are collected or by November 10, 1993, whichever is later.

Page IV-4, third paragraph:

11. 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.

Page V-1:

12. 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.

Page VI-fourth paragraph:

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

NEW MEXICO ENVIRONMENT DEPARTMENT

RESPONSE TO COMMENTS

on the
Safety-Kleen Corp. Service Center Closure Plan
2720 Girard NE, Albuquerque, New Mexico

May 7, 1993

Below are significant public comments received on the proposed closure plan by the New Mexico Environment Department (NMED) during the public comment period which ran from March 26, 1993, through April 26, 1993. Following the comment is NMED's response and any changes made in finalizing the closure plan approval.

1. Comment: Conditions for Closure Plan Approval #1

   S-K preformed a preliminary subsurface investigation in January-February 1992 to evaluate the potential 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 closure activities. If conditions appear different than anticipated or identified during the 1992 investigation, additional samples will be collected.

   NMED Response:

   Condition for Closure Plan Approval #1 was proposed to address the following statement on page III-7 of the closure plan: "The mineral spirits product tank and subsurface degradation associated with the product tank, if present, are not subject to RCRA hazardous waste closure regulations." NMED proposed Condition for Closure Plan Approval #1 to clarify that any and all subsurface degradation found during the conduct of approved closure plan activities is subject to RCRA closure regulations unless Safety-Kleen clearly demonstrates to NMED that the subsurface contamination present results from sources other than the RCRA regulated unit (eg. the mineral spirits

product tank or other potential contaminant source). This means that all activities approved in the closure plan are subject to the New Mexico Hazardous Waste Management Regulations (HWMR-7), Part VI, Subpart G closure regulations and any waste material or contaminated soil excavated or removed during closure activities is subject to HWMR-7, Part VI, Section 40 CFR 265.117(a). Likewise, any contamination left in place must meet NMED-Approved Health-Based Exposure Limit Criteria as the closure performance standard applicable to RCRA regulated units in order for NMED to accept a clean closure certification.

Changes Made in Finalizing Closure Plan Approval:

No changes were made to proposed Condition for Closure Plan Approval #1 in finalizing the closure plan approval.

2. Comment: Conditions for Closure Plan Approval #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 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.

NMED Response:

Condition for Closure Plan Approval #3 proposes sampling and laboratory analysis of contaminated soils and concrete to determine proper disposal as non-hazardous or hazardous waste. The commentor states that preliminary investigations have not identified contaminated soils that would have to managed as hazardous waste if excavated. NMED is not convinced that Safety-Kleen has demonstrated that the limited investigations conducted in 1992 have identified the highest concentrations of contamination in subsoils. One of the main goals of closure activities is to determine the extent of subsoil contamination and its concentrations in order to make decisions on the amount of any excavation necessary to meet the clean closure performance standards.

NMED recognizes that methods other than sampling and laboratory analysis are available to make a hazardous waste determination. Safety-Kleen is ultimately responsible for making a proper determination of whether or not excavated soils are hazardous, and properly managing the waste. Any excavated soils generated during closure are subject to HWMR-7, Part VI, Section 40 CFR 265.117(a). NMED is not requiring that Safety-Kleen conduct laboratory analysis of excavated soils to make a hazard determination. However, NMED reserves the right to take samples to ensure that they are managed properly.

Changes Made in Finalizing Closure Plan Approval:

Condition for Closure Plan Approval #3 is revised as follows:

Contaminated soils and concrete that are excavated during closure are subject to HWMR-7, Part VI, Section 40 CFR 265.117(a), and shall be managed and disposed of properly as hazardous or non-hazardous waste. Safety-Kleen shall notify NMED of any materials excavated and allow NMED the opportunity to collect all samples that NMED deems appropriate to confirm the nature of the waste.

3. Comment: Conditions for Closure Plan Approval #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 appropriate 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.

NMED Response:

Condition for Closure Plan Approval #7 requires Safety-Kleen to submit a closure plan amendment request to NMED within 60 days of completion of Phase 3 sample collection. Closure regulations stipulate that closure activities be completed within 180 days after closure plan approval by the Department. NMED requires Safety-Kleen to submit a closure plan amendment request or closure certification by November 10, 1993 or within 60 days of completion of Phase 3 sample collection, whichever is later. Safety-Kleen is responsible for ensuring timely receipt of laboratory analytical data. The schedule on Figure VII-1 establishes the time frame for completion of Phase 3 sampling efforts.

Changes Made in Finalizing Closure Plan Approval:

Condition for Closure Plan Approval #7 is revised as follows:

A closure plan amendment request will be prepared and submitted to the NMED within 60 days of completion of Phase 3 sample collection or by November 10, 1993, whichever is later. 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.

4. Comment: Conditions for Closure Plan Approval #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.

NMED Response:

Condition for Closure Plan Approval #10 requires the Phase 3 assessment report to be submitted to the NMED within 60 days after samples are collected. Since Safety-Kleen intends to prepare this report in conjunction with the closure progress report and closure plan amendment, NMED requires that the Phase 3 assessment report be submitted at the same time as the closure progress report, closure plan amendment, and/or the closure certification. Since closure activities are to be completed within 180 days after closure plan approval by the Department, the Phase 3 assessment report submittal can not extend beyond that time period, unless Safety-Kleen demonstrates to NMED that closure activities will, of necessity, extend beyond 180 days. Therefore, the Phase 3 assessment report is due to be submitted to NMED by November 10, 1993, or within 60 days after Phase 3 samples are collected, whichever is later.

Changes Made in Finalizing Closure Plan Approval:

Condition for Closure Plan Approval #10 is revised as follows:

The Phase 3 assessment report shall be submitted to NMED within 60 days after Phase 3 samples are collected or by November, 10, 1993, whichever is later.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JAN 25 1994

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Joe Herrin
Senior Project Manager
Safety-Kleen
1000 North Randall Road
Elgin, Illinois 60123-7857

RE: RCRA Facility Investigation (RFI) Report for the Underground Sludge Tank - Safety-Kleen, Albuquerque - NMD000804294

Dear Mr. Herrin:

We have completed a review of your RFI Report dated October 28, 1993. We have determined the Report to be approvable and tentatively agree with its finding of no further action for the Underground Sludge Tank.

However, before the Environmental Protection Agency (EPA) can approve removing this unit from the permit, Safety-Kleen must request from EPA a Class III permit modification under 40 CFR 270.42. Safety-Kleen should also be aware that a Class III permit modification requires a sixty day public comment period and a public hearing.

If have any further questions concerning this letter, please contact Rich Mayer of my staff at (214) 655-7442.

Sincerely yours,

Jack Ditta

for Allyn M. Davis, Director
Hazardous Waste Management Division (6H)

cc: Kathleen Sisneros, NMED

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 2
To Joe Herrin	From Karen
Co. SK	Co. S-K- Elgin
Dept.	Phone #
Fax # (713)-280-9756	Fax # (708) 468-8535

B41

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

BRUCE KING
GOVERNOR

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 4, 1994

Joe Herrin
Senior Project Manager - Remediation
Safety-Kleen Corp.
1000 North Randall Road
Elgin, Illinois 60123-7857

Due June 5, 1994

RE: Closure Certification Request
Safety-Kleen Albuquerque Service Center

Dear Mr. Herrin:

On November 1, 1993, the Hazardous and Radioactive Materials Bureau (HRMB) received the document entitled, "Closure Progress Report and Closure Plan Amendment/Remedial Action Plan Safety-Kleen Corp. Service Center Albuquerque, New Mexico NMD000804294, October 28, 1993". The document contains information on closure activities for the hazardous waste underground storage tank closure plan approved by the New Mexico Environment Department (NMED) on May 7, 1993.

Condition for Closure Plan Approval No.1 included with the NMED May 7, 1993, approval letter states that, "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 a source other than a RCRA regulated hazardous waste management unit." Information on Page 1-6 of your October 28, 1993 document describes the soil contamination to be the result of a release from the product mineral spirits underground storage tank piping that is located adjacent to the hazardous waste unit. The HRMB also obtained additional information from the NMED Underground Storage Tank Bureau (USTB) confirming that soil contamination at the site is a result of a break in the pipe as described above, and not from a release from the hazardous waste underground storage tank. This information includes a September 23, 1991, Inspection Report; September 21, 1991, Tank Tightness Report; September 25, 1991, Incident Report; and a July 28, 1993, Inspection Report.

The applicable regulations governing clean-up of product tank releases may be found in 40 CFR 280 Subpart F. These requirements are administered by the NMED USTB, and are outside of the authority of the HRMB. Based on our review of the October 28, 1993, document and in light of the USTB information which supports the release of

product and not hazardous waste, the HRMB considers that Safety-Kleen has completed hazardous waste closure activities for the hazardous waste underground storage tank through the removal and decontamination activities for the hazardous waste unit. Note that this determination has no bearing on any additional remediation activities which may be required under the USTB or the Environmental Protection Agency authorities.

The HRMB requests that Safety-Kleen submit a closure certification for the hazardous waste underground storage tank containing the information required by the Hazardous Waste Management Regulations (HWMR-7) Part VI, Section 265.115. This closure certification is due to the HRMB within 60 days of your receipt of this letter.

Please contact Marc Sides of my staff at (505) 827-4308 if you have any questions.

Sincerely,

Barbara Hoditschek

Barbara Hoditschek, RCRA Permits Program Manager
Hazardous and Radioactive Materials Bureau

cc: Marc Sides, HRMB
Kalvin Martin, USTB
Rich Mayer, EPA

Albuquerque

APPENDIX B

PRE-EXCAVATION SOIL QUALITY CHARACTERISTICS
WASTE MANAGEMENT WASTE PROFILE
LABORATORY DATA REPORTS

CLOSURE CERTIFICATION REPORT
PARTIAL FACILITY CLOSURE
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD 000804294

TriHydro Corporation

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

CORRES

June 30, 1993

Mr. Kevin Bunker
Waste Management of New Mexico
402 Industrial Park Loop NE
Rio Rancho, NM 87124

Re: Disposal of Degraded Soils From Safety-Kleen Corp. Service Center, Albuquerque, New Mexico

Dear Mr. Bunker:

Safety-Kleen Corp. (S-K) intends to remove underground storage tanks (USTs) from the S-K service center in Albuquerque, New Mexico during the week of July 19 or July 26, 1993. Between 100 and 200 cubic yards of soils and construction debris degraded with mineral spirits will be generated during the onsite activities. S-K requests approval from Waste Management to dispose of the soil and construction debris (concrete, lumber, etc.) at the Waste Management Rio Rancho Landfill near Albuquerque, New Mexico. Enclosed as Attachment A is a completed Generator's Waste Profile Sheet.

S-K arranged to have soil samples taken from the area surrounding the USTs during the week of June 1, 1993. Six test holes were constructed to a depth of approximately three feet below ground surface, and soil was obtained from each site. The soils were composited into one representative sample and submitted to GTEL Laboratory (Wichita, KS) for TCLP analyses (metals, VOCs, and semi-volatiles) in accordance with 40 CFR 261.24. In addition, the composite soil sample was analyzed for total metals (cadmium, chromium and lead), volatile organic compounds, ignitibility and mineral spirits.

Mineral spirits (230 mg/kg) and two total metals, (chromium at 11 mg/kg and lead at 10 mg/kg) were the only constituents detected in the representative composite soil sample. Copies of the laboratory data sheets and chain-of-custody/sample-analysis-request forms are included in Attachment B. A Material Safety Data Sheet for S-K mineral spirits is included as Attachment C.

S-K requests that Waste Management evaluate the analytical data and determine if the soils and construction debris are acceptable for disposal at the Rio Rancho Landfill. Subsequent to Waste Management's approval, S-K will make arrangements to have the soils loaded and transported to the landfill. If any other forms and/or information are required by Waste Management, S-K would appreciate receiving notice of these items as soon as possible. Note Waste

Management approved disposal of similar soils from this site under Waste Profile Sheet Code 170474 (1992).

The invoice(s) for disposal of this soil and construction debris should be submitted to Joe Herrin, Safety-Kleen Corp., 17629 El Camino Real, Houston, TX 77058. In addition, the invoice(s) must include the site name (Safety-Kleen Corp., Albuquerque, New Mexico) and S-K authorization No. RM250910248582.

Disposal activities will be coordinated primarily through TriHydro Corporation (Laramie, Wyoming). If you have any questions or need additional information, please feel free to call either Jack Bedessem or Jeff Weber (TriHydro Corporation) at (307) 745-7474 or me at (713) 280-9754.

Sincerely,
SAFETY-KLEEN CORP.

Joe Herrin
Senior Project Manager - Remediation

JAW:ahj/714

Attachments

cc: Gary Long

ATTACHMENT A

GENERATOR'S WASTE PROFILE SHEET

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Waste Profile Sheet Code: WMNA 028463

s form is to be used to comply with the requirements of a waste agreement.

NSTRUCTIONS FOR COMPLETING THIS FORM ARE ATTACHED

ded Areas For Contractor Use Only)

Decision Expiration Date: / /

ontractor Sales Rep#: _____

Service Agr. Renewal Date: / /

WASTE GENERATOR INFORMATION

Generator Name: Safety-Kleen Corp. 2. SIC Code: 7399

1. Facility Address (site of waste generation): 2720 Girard Blvd. NE

Generator City, State/Province: Albuquerque, NM 5. Zip/Postal Code: 87107

Generator USEPA/Federal ID #: NMD000804294 7. State/Province ID #: _____

Technical Contact: Mr. Joe Herrin 9. Phone: (310) 831 - 3903

WASTE STREAM INFORMATION (See Instructions)

Name of Waste: Soil and construction debris contaminated with mineral spirits

Process Generating Waste: UST removal

3. Annual Amount/Units: 200 yds^3 4. Type A ☒ Type B ☐

Special Handling Instructions/Supplemental Information: See Laboratory Data Sheets (Attachment B) and S-K Material Safety Data Sheet (Attachment C)

Incidental Waste Types and Amounts: None

C. TRANSPORTATION INFORMATION

Method of Shipment: ☐ Bulk Liquid ☐ Bulk Sludge ☒ Bulk Solid ☐ Drum/Box ☐ Other _____

Supplemental Shipping Information: _____

Is this a DOT hazardous material? ☒ No ☐ Yes (If yes, complete 4, 5 & 6) 4. Hazard Class/ID #: N/A

5. Reportable Quantity/Units (lb/kg): N/A 6. Shipping Name: N/A

TECHNICAL MANAGER DECISION (Check One) ☐ APPROVED ☐ DISAPPROVED ☐ Check if additional information is attached

If Disapproved, Explain: _____

If Approved, Continue.

1. Management Method(s) _____

2. Precautions, Conditions, or Limitations on Approval: _____

For Type A Wastes, Laboratory Analysis of a Representative Sample Was: ☐ Waived ☐ Attached

If waived, explain why: _____

List Non-WMI Facility that is Approved to Manage this Waste: _____ Date: _____

Tech. Mgr. Signature: _____ Name (Print): _____ Date: _____

. MANAGEMENT FACILITY INFORMATION / DECISION

1. Proposed Management Facility: _____

2. Proposed Intermediate Transfer Facility: _____ 3. Transporter: _____

Management Facility Gen. Mgr. Decision (Check One) ☐ APPROVED ☐ DISAPPROVED

If Disapproved, Explain: _____

If Approved, List

Precautions, Conditions, or Limitations on Approval: _____

General Mgr. Signature: _____ Name (Print): _____ Date: _____

Turn Page and Complete Side 2 (If Type B Special Waste, only complete Part J of Side 2)

GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

F. PHYSICAL CHARACTERISTICS OF WASTE (See Instructions)

1. Color	2. Does the waste have a strong incidental odor?	3. Physical State @ 70°F/21°C:	4. Layers	5. Specific Gravity	6. Free Liquids:
N/A	☐ No ☒ Yes; if so, describe: Solvent	☐ Solid ☐ Semi-Solid ☐ Liquid ☐ Powder ☐ Other: N/A	☐ Multi-layered ☐ Bi-layered ☒ Single Phased	Range 1.8 - 2.2	☐ Yes ☒ No Volume: N/A %

7. pH: ☐ ≤2 ☐ > 2-4 ☐ 4-7 ☐ 7 ☐ 7-10 ☐ 10- <12.5 ☐ ≥12.5 ☐ Range ☒ NA

8. Flash Point: ☐ None ☐ <140°F/60°C ☐ 140 - 199°F/60 - 93°C ☒ ≥200°F/93°C ☐ Closed Cup ☐ Open Cup

G. CHEMICAL COMPOSITION

	RANGE (MIN-MAX)
1. See attached Laboratory Data Sheets	- %
(Attachment B)	- %
	- %
Soil	84.98-85 %
Construction Debris (Concrete,	- %
Lumber)	0-15 %
Mineral Spirits	0-0.02 %
	- %
	- %
Total:	100.02 %

2. Does the waste contain any of the following? (provide concentration if known):

	NO	or	LESS THAN	or	ACTUAL
PCBs	☒		☐ < 50 ppm		____ ppm
Cyanides	☒		☐ < 30 ppm		____ ppm
Sulfides	☒		☐ < 500 ppm		____ ppm

Please note: Unless analytical results are attached, the chemical composition identification should include, at a minimum, Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver, Pesticides, Herbicides, and any other TCLP constituents that may be present in the waste. The total composition must be greater than or equal to 100%. .0001% = 1 ppm or 1 mg/l)

3. Indicate method used to determine composition (if provided): ☒ TCLP ☒ Total ☐ Other: ____

H. SAMPLING SOURCE (e.g., Drum, Lagoon, Pit, Pond, Tank, Vat) Test Hole Composite

I. REPRESENTATIVE SAMPLE CERTIFICATION

1. Print Sampler's Name: Jeffrey A. Weber
2. Sample Date: June 1, 1993
3. Sampler's Title: Engineer
4. Sampler's Employer (if other than Generator): TriHydro Corporation, Laramie, Wyoming

The sampler's signature certifies that any sample submitted is representative of the waste described above pursuant to 40 CFR 261.20(c) or equivalent rules.

5. Sampler's Signature Jeffrey A. Weber

J. GENERATOR CERTIFICATION

By signing this profile sheet, the Generator cetifies:

1. This waste is not a "Hazardous Waste" as defined by USEPA or Canadian Federal regulation and/or the state/province.
2. This waste does not contain regulated radioactive materials or regulated concentrations of PCB's (Polychiorinated Biphenyls).
3. The unshaded portions of this sheet and the attachments contain true and accurate descriptions of the waste material. All relevant information regarding known or suspected hazards in the possession of the Generator has been disclosed.
4. The Generator has read and understands the Contractor's Definition of Special Waste includedin Part B.5. of the attached instructions form All types and amounts of special wastes provided in incidental amounts have been identified in section B.6. of this form.
5. The analytical data presented herein or attached hereto were derived from testing a representative sample taken in accordance with 40 CFR 261.20(c) or equivalent rules.
6. If any changes occur in the character of the waste, the Generator shall notify the Contractor prior to providing the waste to the Contractor

7. Signature Joseph A. Herrin
8. Title Senior Project Manager - Remediation
9. Name (Type or Print) Joe Herrin
10. Date 6-30-93

ATTACHMENT B

SOIL QUALITY DATA
LABORATORY DATA SHEETS

GTEL
ENVIRONMENTAL
LABORATORIES, INC.
Midwest Region
4211 May Avenue
Wichita, KS 67209
(316) 945-2624
(800) 633-7936
(316) 945-0506 (FAX)

GTEL Client Number: TRI02.SFK01
Project ID (Number): 714
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018

June 16, 1993

Jack Bedessem
TriHydro Corporation
920 Sheridan Street
Laramie, WY 82070

Dear Mr. Bedessem:

Enclosed please find the analytical results for samples received by GTEL Environmental Laboratories on 06-02-93.

A formal quality control/quality assurance program is maintained by GTEL, which is designed to meet or exceed the EPA requirements. Analytical work for this project met QA/QC criteria unless otherwise stated in the footnotes.

GTEL is certified by the State of Kansas under Certification #E-103 and #E-1113.

If you have any questions concerning this analysis, or if we can be of further assistance, please call our Customer Service Representative.

Sincerely,

Lori K Long
Asst Lab Director

Terry R. Loucks
Laboratory Director

GTEL Wichita, KS
COVLET.SET

GTEL Client Number: TRI02.SFK01
Project ID (Number): 561
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018
Date Reported: 06-16-93

Table 1

ANALYTICAL RESULTS

Total Petroleum Hydrocarbons as Mineral Spirits in Soil
GC/FID[a]

Sample Identification		Date Sampled	Date Extracted	Date Analyzed	Concentration, mg/kg	Reporting Limit, mg/kg	% Solids
GTEL No.	Client ID						
01	060193-COMP	06-01-93	06-09-93	06-11-93	230	10	97.7

a ASTM Method D3328 (modified) is used for qualitative identification of fuel patterns. The method has been modified to include quantitation by applying calibration and quality assurance guidelines outlined in EPA's publication, Test Methods for Evaluating Solid Waste, SW846, Third Edition, Revision 0, November 1986. Extraction by modified EPA Method 3550. Results are calculated on a wet weight basis.

b Chromatographic pattern indicated the presence of non-target hydrocarbons.

NOTE: Sample temperature when received at the laboratory was 8°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

ATTACHMENT C

MINERAL SPIRITS
MATERIAL SAFETY DATA SHEETS

GTEL Client Number: TRI02.SFK01
Project ID (Number): 561
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018
Date Reported: 06-16-93

Table 1

ANALYTICAL RESULTS

Inorganics in Soil

GTEL Sample Number			01			
Client Identification			060193 Comp			
Date Sampled			06-01-93			
Date Analyzed			06-11-93			
Analyte	Method	QL[a] & Units	Concentration			
Closed Cup Flashpoint	ASTM D-93	NA °F	>200[a]			

a Ignitability of solid waste is not regulated by EPA and no official method exists for its determination.

* Quantitation Limit.

b Ignitability of solid waste is not regulated by EPA and no official method exists for its determination.

NA Not applicable

NOTE: Sample temperature when received at the laboratory was 8°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

Safety-Kleen Corp Albuquerque

CHAIN-OF-CUSTODY RECORD

Page ____ of ____

Project No.: 56-714 GB	Today's Date: 6/1/93	Date Results Requested: Normal-TAT
Sampler's Name: Jeff Weber	Phone No.: 307-745-7474	Fax No.: 307-745-7729
Company Name and Address: Trihydro Corporation 920 Sheridan Street Laramie, WY 82070	Company Contact: Jack Boressen Jeff Weber	

Collector's Sample No.	Sample Matrix	Date Sampled/ Time Sampled	No. of Containers	Analyses Requested: TCLP VOCs, SVOCs, Metals	Ignitability	Mineral Spirits (8015 Mod)	VOA's 8240 GC/MS	Cadmium 6010 GB	Chromium 6010 GB	Lead 6010 GB
060193-Comp	Soil	6/1/93 1410	5	*	1	1	1	1	1	1

Remarks: * Run composite sample for TCLP: VOCs, SVOCs and Metals GB

Relinquished by:	Affiliation:	Date/Time:	Received by:	Affiliation:	Date/Time:
[signature]	Trihydro	6/1/93 1615			
Relinquished by:	Affiliation:	Date/Time:	Received by:	Affiliation:	Date/Time:
Relinquished by:	Affiliation:	Date/Time:	Received by: [signature]	Affiliation: GTEL	Date/Time: 6/2/93 0800

Were samples received in good condition? Remarks:

Received & Faxed to GTEL 6/2/93 GB

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 2

To	Co.	Dept.	Fax #
Martha Leland	GTEL		

From	Co.	Phone #	Fax #
Jack Boressen	Trihydro		

714

GTEL Client Number: TRI02.SFK01
Project ID (Number): 714
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018
Date Reported: 06-16-93

ANALYTICAL RESULTS

Semivolatile Organics in TCLP Leachate[a]
EPA Method 8270[b]

GTEL Sample Number		01			
Client Identification		060193-Comp			
Date Sampled		06-01-93			
Date Leached		06-07-93			
Date Extracted		06-11-93			
Extraction Fluid		#2			
Date Analyzed		06-14-93			
Analyte	Quantitation Limit, mg/L	Concentration, mg/L			
o-Cresol	0.033	<0.033			
m-Cresol + p-Cresol	0.033	<0.033			
1,4-Dichlorobenzene	0.033	<0.033			
2,4-Dinitrotoluene	0.033	<0.033			
Hexachloro-1,3-butadiene	0.033	<0.033			
Hexachlorobenzene	0.033	<0.033			
Hexachloroethane	0.033	<0.033			
Nitrobenzene	0.033	<0.033			
Pentachlorophenol	0.17	<0.17			
Pyridine	0.033	<0.033			
2,4,5-Trichlorophenol	0.033	<0.033			
2,4,6-Trichlorophenol	0.033	<0.033			
Quantitation Limit Multiplier[c]		1			

a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA, November 1986; extraction by EPA Method 3510 (liquid/liquid). TCLP performed as per 40 CFR, Part 261, Appendix II - Method 1311. These data are presented in accordance with the Federal Register, 57, p.55114, November 24, 1992.

b Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA, November 1986; extraction by EPA Method 3510 (liquid/liquid).

c The quantitation limit multiplier indicates the adjustments made to the data and detection limits for sample dilutions.

NOTE: Sample temperature when received at the laboratory was 8°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TRI02.SFK01
Project ID (Number): 561
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018
Date Reported: 06-16-93

ANALYTICAL RESULTS

Metals in TCLP Leachate[a]

GTEL Sample Number			01			
Client Identification			060193 Comp			
Date Sampled			06-01-93			
Date Leached			06-10-93			
Extraction Fluid			#2			
Date Analyzed (Method 7470)			06-16-93			
Date Analyzed (Method 6010)			06-11-93			
Dilution Multiplier (Method 6010)[b]			4			
Analyte	Method[c]	Reporting Limit, mg/L	Concentration, mg/L			
Arsenic	EPA 6010	.50	<2.0			
Barium	EPA 6010	1.0	<4.0			
Cadmium	EPA 6010	.050	<0.20			
Chromium	EPA 6010	.050	<0.20			
Lead	EPA 6010	.50	<2.0			
Mercury	EPA 7470	.002	<0.002			
Selenium	EPA 6010	.20	<0.80			
Silver	EPA 6010	.050	<0.20			

a TCLP performed as per 40 CFR, Part 261, Appendix II - Method 1311. These data are presented in accordance with the Federal Register, 57, p.55114, November 24, 1992.

b The dilution multiplier indicates the adjustments made for dilutions.

c Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA, November 1986; Digestion by Method 3010 for Method 6010 analytes and Method 7470 for mercury.

NOTE: Sample temperature when received at the laboratory was 8°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TRI02.SFK01
Project ID (Number): 561
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018
Date Reported: 06-16-93

Table 1

ANALYTICAL RESULTS

Metals in Soil[a]

GTEL Sample Number			01			
Client Identification			060193 Comp			
Date Sampled			06-01-93			
Date Digested			06-11-93			
Date Analyzed			06-14-93			
Analyte	Method	QL* mg/Kg	Concentration, mg/Kg			
Cadmium	EPA 6010	2	<2			
Chromium	EPA 6010	1	11			
Lead	EPA 6010	10	10			
Percent Solids			97.7			

a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA November 1986; Digestion by Method 3050, except 7471 which is method specific. Results calculated on a wet weight basis.

* Quantitation Limit.

NOTE: Sample temperature when received at the laboratory was 8°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TRI02.SFK01
Project ID (Number): 714
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018
Date Reported: 06-15-93

ANALYTICAL RESULTS

Volatile Organics in TCLP Leachate[a]
EPA Method 8240 Modified

GTEL Sample Number		01			
Client Identification		060193 Comp			
Date Sampled		06-01-93			
Date Leached		06-03-93			
Extraction Fluid		1			
Date Analyzed		06-06-93			
Dilution Multiplier[b]		1			
Analyte	Reporting Limit, mg/L	Concentration, mg/L			
Benzene	0.050	<0.050			
Carbon tetrachloride	0.050	<0.050			
Chlorobenzene	0.050	<0.050			
Chloroform	0.050	<0.050			
1,4-Dichlorobenzene	0.050	<0.050			
1,2-Dichloroethane	0.050	<0.050			
1,1-Dichloroethylene	0.050	<0.050			
Methyl ethyl ketone	0.20	<0.20			
Tetrachloroethylene	0.050	<0.050			
Trichloroethylene	0.050	<0.050			
Vinyl chloride	0.10	<0.10			

a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA, November 1986. This method is modified for megabore column use. TCLP is performed as per 40 CFR, Part 261, Appendix II - Method 1311. These data are presented in accordance with the Federal Register 57, p. 55114, November 24, 1992.

b Dilution multiplier indicates the adjustments made for sample dilution.

NOTE: Sample temperature when received at the laboratory was 8°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TRI02.SFK01
Project ID (Number): 714
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018
Date Reported: 06-15-93

ANALYTICAL RESULTS

Volatile Organics in Soil
EPA Method 8240[a]

GTEL Sample Number		01			
Client Identification		060193 Comp			
Date Sampled		06-01-93			
Date Analyzed		06-06-93			
Dilution Multiplier[b]		1			
Analyte	Reporting Limit, mg/kg	Concentration, mg/kg			
Chloromethane	1.2	<1.2			
Bromomethane	1.2	<1.2			
Vinyl Chloride	1.2	<1.2			
Chloroethane	1.2	<1.2			
Methylene Chloride	1.2	<1.2			
Acetone	2.5	<2.5			
Carbon Disulfide	0.6	<0.6			
1,1-Dichloroethene	0.6	<0.6			
1,1-Dichloroethane	0.6	<0.6			
1,2-Dichloroethene (total)[c]	0.6	<0.6			
Chloroform	0.6	<0.6			
1,2-Dichloroethane	0.6	<0.6			
2-Butanone	2.5	<2.5			
1,1,1-Trichloroethane	0.6	<0.6			
Carbon Tetrachloride	0.6	<0.6			
Vinyl Acetate	2.5	<2.5			
Bromodichloromethane	0.6	<0.6			
1,2-Dichloropropane	0.6	<0.6			
cis-1,3-Dichloropropene	0.6	<0.6			
Trichloroethene	0.6	<0.6			
Dibromochloromethane	0.6	<0.6			

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TRI02.SFK01
Project ID (Number): 714
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-06-0018
Date Reported: 06-15-93

ANALYTICAL RESULTS

Volatile Organics in Soil
EPA Method 8240[a]

GTEL Sample Number		01			
Client Identification		060193 Comp			
Date Sampled		06-01-93			
Date Analyzed		06-06-93			
Dilution Multiplier[b]		1			
Analyte	Reporting Limit, mg/kg	Concentration, mg/kg			
1,1,2-Trichloroethane	0.6	<0.6			
Benzene	0.6	<0.6			
2-Chloroethylvinyl Ether	1.2	<1.2			
trans-1,3-Dichloropropene	0.6	<0.6			
Bromoform	0.6	<0.6			
4-Methyl-2-pentanone	2.5	<2.5			
2-Hexanone	2.5	<2.5			
Tetrachloroethene	0.6	<0.6			
1,1,2,2-Tetrachloroethane	0.6	<0.6			
Toluene	0.6	<0.6			
Chlorobenzene	0.6	<0.6			
Ethylbenzene	0.6	<0.6			
Styrene	0.6	<0.6			
Xylenes (total)	0.6	<0.6			
1,2-Dichlorobenzene	1.2	<1.2			
1,3-Dichlorobenzene	1.2	<1.2			
1,4-Dichlorobenzene	1.2	<1.2			
Percent Solids	%	97.7			

a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA November 1986; sample preparation by high-level methanol extraction and purge and trap. This method is modified for megabore column use and additional compounds. Results are calculated on a wet weight basis.

b Dilution multiplier indicates the adjustments made for sample dilution.

c Total 1,2-dichloroethene is the sum of the cis- and trans- isomers.

NOTE: Lower detection limits could not be achieved due to the high concentration of non-target analytes.

NOTE: Sample temperature when received at the laboratory was 8°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

APPENDIX C

WASTE MANIFESTS/BILLS OF LADING FOR SOILS DISPOSAL
AT THE WASTE MANAGEMENT LANDFILL
RIO RANCHO, NEW MEXICO

CLOSURE CERTIFICATION REPORT
PARTIAL FACILITY CLOSURE
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD 000804294

SPECIAL WASTE SHIPMENT RECORD

Waste Management of New Mexico
P.O. Box 15700
Rio Rancho, New Mexico 87174
505/892-1200
A Waste Management Company

1551 750-800 N
3766 75-700 E
5500-5510 ELEV

Shipment # № 1331

Profile # 028463

1. Work site name and address
SAFETY-KLEEN CORP 2720 GIRARD NE ALBUQUERQUE NM

2. Operator's name and address
SAME AS #1

Operator's Telephone no.
505
884 22 77

3. Owner's name and mailing address
SAFETY-KLEEN CORP - Attn Joe Herrin
17629 EL CAMINO REAL
HOUSTON TX 77058

Owner's telephone no.
713
280 9754

4. Address of responsible agency
NMED Air Quality Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0064

5. Description materials	6. Containers No.	Type	7. Total quantity m3 (yd3)
SOIL & CONST. DEBRIS CONTAMINATED WITH MINERAL SPIRITS	1	TRUCK	25 CY

8. **Special handling instructions:**
Do not break bags or cause dust, avoid breathing dust. Bury separately and cover with backfill.

9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and government regulations.

Printed/typed name and title	Signature	Month/Day/Year
JA Weber Engineer	JA Weber	7 28 93

10. Transporter 1 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
TAHOE TRAXCAVATORS RICHARD D. LOOLSKY (DRIVER)	Richard D. Loolsky	7 28 93

11. Transporter 2 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
		/ /

12. Discrepancy indication space

13. Waste disposal site Operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed/typed name & title	Signature	Month/Day/Year
Delores Ford, Gate	Delores Ford	07 28 93

White/GEN Green/LANDFILL Yellow/NMED Pink/TRANSPORTER Gold/EXTRA

SPECIAL WASTE SHIPMENT RECORD

Waste Management of New Mexico
P.O. Box 15700
Rio Rancho, New Mexico 87174
505/892-1200
A Waste Management Company

1557 750 - 800 N
376 676 - 700 E
5500 - 5510 - ELEV

Shipment # Nº 1329

Profile # 028463

1. Work site name and address
SAFETY-KLEEN CORP 2720 GIRARD NE ALBUQUERQUE NM

2. Operator's name and address
SAME AS #1

Operator's Telephone no.
505 884 2277

3. Owner's name and mailing address
SAFETY KLEEN CORP - Attn Joe Herrin
17629 EL CAMINO REAL
HOUSTON TX 77058

Owner's telephone no.
713 280 9754

4. Address of responsible agency
NMED Air Quality Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0064

5. Description materials	6. Containers No. Type	7. Total quantity m3 (yd3)
SOIL & CONST. DEBRIS		
CONTAMINATED WITH	1 TRUCK	~~12~~ CY
MINERAL SPIRITS		24 AW

8. **Special handling instructions:**
Do not break bags or cause dust, avoid breathing dust. Bury separately and cover with backfill.

9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and government regulations.

Printed/typed name and title	Signature	Month/Day/Year
JA Weber Engineer	JA Weber	7/28/93

10. Transporter 1 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
CHAVA TRUCKING 6313 State Rd 47 SE ALBUQUERQUE NM	A. Martinez	7 28 93

11. Transporter 2 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
		/ /

12. Discrepancy indication space

13. Waste disposal site Operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed/typed name & title	Signature	Month/Day/Year
Delores Ford, Gate	Delores Ford	07/28/93

White/GEN Green/LANDFILL Yellow/NMED Pink/TRANSPORTER Gold/EXTRA

SPECIAL WASTE SHIPMENT RECORD

Waste Management of New Mexico
P.O. Box 15700
Rio Rancho, New Mexico 87174
505/892-1200
A Waste Management Company

1557 750-900 N
376 675-700 E
5500-5510 ELEV

Shipment # № 1330

Profile # 028463

1. Work site name and address
SAFETY-KLEEN CORP 2720 GIRARD NE ALBUQUERQUE NM

2. Operator's name and address
SAME AS #1

Operator's Telephone no.
505 884 2277

3. Owner's name and mailing address
SAFETY-KLEEN CORP - ATTN JOE HERRIN
17629 EL CAMINO REAL
HOUSTON TX 77058

Owner's telephone no.
713 280 9754

4. Address of responsible agency
NMED Air Quality Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0064

5. Description materials	6. Containers No.	Type	7. Total quantity m3 (yd3)
SOIL & CONST DEBRIS CONTAMINATED WITH MINERAL SPIRITS	1	TRUCK	17 CY

8. **Special handling instructions:**
Do not break bags or cause dust, avoid breathing dust. Bury separately and cover with backfill.

9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and government regulations.

Printed/typed name and title	Signature	Month/Day/Year
JA Weber Engineer	JA Weber	7/28/93

10. Transporter 1 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
CHAVA TRUCKING 6313 State Rd 47 SE ALBUQUERQUE NM	Joe Montano	7/28/93

11. Transporter 2 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
		/ /

12. Discrepancy indication space

13. Waste disposal site Operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed/typed name & title	Signature	Month/Day/Year
		/ /

White/GEN Green/LANDFILL Yellow/NMED Pink/TRANSPORTER Gold/EXTRA

SPECIAL WASTE SHIPMENT RECORD

Waste Management of New Mexico
P.O. Box 15700
Rio Rancho, New Mexico 87174
505/892-1200
A Waste Management Company

1557760-800 N
376675-700 E
6500-5510 ELEV

Shipment # № 1328

Profile # 028463

1. Work site name and address
SAFETY-KLEEN CORP 2720 GIRARD NE ALBUQUERQUE NM

2. Operator's name and address	Operator's Telephone no.
SAME AS #1	505 884 2277

3. Owner's name and mailing address	Owner's telephone no.
SAFETY KLEEN CORP - Attn. JOE HERRIN 17629 EL CAMINO REAL HOUSTON TX 77058	713 280 9754

4. Address of responsible agency
NMED Air Quality Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0064

5. Description materials	6. Containers No. Type	7. Total quantity m3 (yd3)
SOIL & CONST DEBRIS		
CONTAMINATED WITH	1 TRUCK	17 CY
MINERAL SPIRITS		

8. Special handling instructions:
Do not break bags or cause dust, avoid breathing dust. Bury separately and cover with backfill.

9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and government regulations.

Printed/typed name and title	Signature	Month/Day/Year
J Allebach Engineer		7 28 93

10. Transporter 1 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
TAHOE TRUCKING RIO RANCHO 891-0004		/ / 7 28 93

11. Transporter 2 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
		/ /

12. Discrepancy indication space

13. Waste disposal site Operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed/typed name & title	Signature	Month/Day/Year
Delores Ford, Gate	Delores Ford	07 28 93

White/GEN Green/LANDFILL Yellow/NMED Pink/TRANSPORTER Gold/EXTRA

SPECIAL WASTE SHIPMENT RECORD

Waste Management of New Mexico
P.O. Box 15700
Rio Rancho, New Mexico 87174
505/892-1200
A Waste Management Company

1557 750 800 N
376 675 700 E
5500 5510 ELEV

Shipment # № 1330

Profile # 028463

1. Work site name and address
SAFETY-KLEEN CORP 2720 GIRARD NE ALBUQUERQUE NM

2. Operator's name and address
SAME AS #1

Operator's Telephone no.
505
884 2277

3. Owner's name and mailing address
SAFETY-KLEEN CORP - ATTN JOE HERRIN
17629 EL CAMINO REAL
HOUSTON TX 77058

Owner's telephone no.
713
280 9754

4. Address of responsible agency
NMED Air Quality Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0064

5. Description materials	6. Containers No.	Type	7. Total quantity m3 (yd3)
SOIL & CONST DEBRIS CONTAMINATED WITH MINERAL SPIRITS	1	TRUCK	24 yd³

8. **Special handling instructions:**
Do not break bags or cause dust, avoid breathing dust. Bury separately and cover with backfill.

9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and government regulations.

Printed/typed name and title	Signature	Month/Day/Year
JA Weber Engineer	JA Weber	7/28/93

10. Transporter 1 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
Tahoe Traxcavators Richard D. Goolsby (driver)	Richard D. Goolsby	7/28/93

11. Transporter 2 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year

12. Discrepancy indication space

13. Waste disposal site Operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed/typed name & title	Signature	Month/Day/Year
Delores Ford, Gate	Delores Ford	07/28/93

White/GEN Green/LANDFILL Yellow/NMED Pink/TRANSPORTER Gold/EXTRA

SPECIAL WASTE SHIPMENT RECORD

Waste Management of New Mexico
P.O. Box 15700
Rio Rancho, New Mexico 87174
505/892-1200
A Waste Management Company

Shipment # № 1330

Profile # 028463

1. Work site name and address
SAFETY-KLEEN CORP 2720 GIRARD NE ALBUQUERQUE NM

2. Operator's name and address
SAME AS #1

Operator's Telephone no.
505 884 2277

3. Owner's name and mailing address
SAFETY-KLEEN CORP - ATTN JOE HERRIN
17629 EL CAMINO REAL
HOUSTON TX 77058

Owner's telephone no.
713 280 9754

4. Address of responsible agency
NMED Air Quality Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0064

5. Description materials	6. Containers No.	Type	7. Total quantity m3 (yd3)
SOIL & CONST DEBRIS			
CONTAMINATED WITH	1	TRUCK	24 yd³
MINERAL SPIRITS			

8. **Special handling instructions:**
Do not break bags or cause dust, avoid breathing dust. Bury separately and cover with backfill.

9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and government regulations.

Printed/typed name and title	Signature	Month/Day/Year
J A Weber - Engineer	J A Weber	7 28 93

10. Transporter 1 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
Chava Excavating Albuquerque, NM	G. Martinez	7 28 93

11. Transporter 2 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
		/ /

12. Discrepancy indication space

13. Waste disposal site Operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed/typed name & title	Signature	Month/Day/Year
Delores Ford, Gate	Delores Ford	07/28/93

White/GEN Green/LANDFILL Yellow/NMED Pink/TRANSPORTER Gold/EXTRA

SPECIAL WASTE SHIPMENT RECORD

Waste Management of New Mexico
P.O. Box 15700
Rio Rancho, New Mexico 87174
505/892-1200
A Waste Management Company

1551 750 800 N
376 675 700 E
5500 5510 ELEV

Shipment # № 1330

Profile # 028463

1. Work site name and address
SAFETY-KLEEN CORP 2720 GIRARD NE ALBUQUERQUE NM

2. Operator's name and address
SAME AS #1

Operator's Telephone no.
505
884 2277

3. Owner's name and mailing address
SAFETY-KLEEN CORP - ATTN JOE HERRIN
17629 EL CAMINO REAL
HOUSTON TX 77058

Owner's telephone no.
713
280 9754

4. Address of responsible agency
NMED Air Quality Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0064

5. Description materials	6. Containers No.	Type	7. Total quantity m3 (yd3)
SOIL & CONST DEBRIS			
CONTAMINATED WITH	1	TRUCK	24 yd3
MINERAL SPIRITS			

8. **Special handling instructions:**
Do not break bags or cause dust, avoid breathing dust. Bury separately and cover with backfill.

9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and government regulations.

Printed/typed name and title	Signature	Month/Day/Year
JA Weber - Engineer	JA Weber	7 28 93

10. Transporter 1 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
TAHOE Trucking Rio Rancho NM	Tom [illegible]	7 28 93

11. Transporter 2 (Acknowledgement of receipt of materials)

Printed/typed name & title, address, telephone no.	Signature	Month/Day/Year
		/ /

12. Discrepancy indication space

13. Waste disposal site Operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.

Printed/typed name & title	Signature	Month/Day/Year
Delores Ford, Gate	Delores Ford	07 28 93

White/GEN Green/LANDFILL Yellow/NMED Pink/TRANSPORTER Gold/EXTRA

APPENDIX D

CERTIFICATE OF DESTRUCTION FOR USTS

CLOSURE CERTIFICATION REPORT
PARTIAL FACILITY CLOSURE
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD 000804294

#738

TANK CERTIFICATE OF DESTRUCTION

The 2-20,000 gallon UST's,steel sections of the return/fill station,and all piping associated with the UST's removal at the Safety Kleen Facility located at 2070 Girard N.E., Albuqurque,NM. were destroyed beyond use by Riedel Environmental Service prior to the removal of the tanks. The tanks were transported to Acme Salvage of Albuquerqe,NM. for steel recycling on July 27,1993.

Riedel Environmental Services, Denver, CO.

JB

APPENDIX E

UST EXCAVATION SAMPLING ANALYTICAL RESULTS
AND
CHAIN-OF-CUSTODY/SAMPLE-ANALYSIS-REQUEST FORMS

CLOSURE CERTIFICATION REPORT
PARTIAL FACILITY CLOSURE
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD 000804294

GTEL
ENVIRONMENTAL
LABORATORIES, INC.

Midwest Region
4211 May Avenue
Wichita, KS 67209
(316) 945-2624
(800) 633-7936
(316) 945-0506 (FAX)

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485

AUG 1 3 1993

Jack Bedessem
TriHydro Corporation
920 Sheridan Street
Laramie, WY 82070

Dear Mr. Bedessem:

Enclosed please find the analytical results for samples received by GTEL Environmental Laboratories on 07-30-93.

A formal quality control/quality assurance program is maintained by GTEL, which is designed to meet or exceed the EPA requirements. Analytical work for this project met QA/QC criteria unless otherwise stated in the footnotes.

GTEL is certified by the State of Kansas under Certification #E-103 and #E-1113.

If you have any questions concerning this analysis, or if we can be of further assistance, please call our Customer Service Representative.

Sincerely,

Randy McKennedy/Extractables Mgr.

Terry R. Loucks
Laboratory Director

GTEL Wichita, KS
COVLET.SET

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-09-93

ANALYTICAL RESULTS

Volatile Organics in Soil
Modified EPA Method 8240[a]

GTEL Sample Number		01	02	03	04
Client Identification		PTNB	STNB	PTBS	STBS
Date Sampled		07-28-93	07-28-93	07-28-93	07-28-93
Date Analyzed		08-02-93	08-02-93	08-02-93	08-02-93
Dilution Multiplier[b]		1	1	3	5
Analyte	Reporting Limit, mg/kg	Concentration, mg/kg			
Chloromethane	0.010	<0.010	<0.010	<0.030	<0.050
Bromomethane	0.010	<0.010	<0.010	<0.030	<0.050
Vinyl Chloride	0.010	<0.010	<0.010	<0.030	<0.050
Chloroethane	0.010	<0.010	<0.010	<0.030	<0.050
Methylene Chloride	0.010	<0.010	<0.010	<0.030	<0.050
Acetone	0.020	<0.020	<0.020	**0.13**	**0.34**
Carbon Disulfide	0.005	<0.005	<0.005	<0.015	<0.025
1,1-Dichloroethene	0.005	<0.005	<0.005	<0.015	<0.025
1,1-Dichloroethane	0.005	<0.005	<0.005	<0.015	<0.025
1,2-Dichloroethene (total)[c]	0.005	<0.005	<0.005	<0.015	<0.025
Chloroform	0.005	<0.005	<0.005	<0.015	<0.025
1,2-Dichloroethane	0.005	<0.005	<0.005	<0.015	<0.025
2-Butanone	0.020	<0.020	<0.020	<0.060	<0.10
1,1,1-Trichloroethane	0.005	<0.005	<0.005	**0.039**	**0.42**
Carbon Tetrachloride	0.005	<0.005	<0.005	<0.015	<0.025
Vinyl Acetate	0.020	<0.020	<0.020	<0.060	<0.010
Bromodichloromethane	0.005	<0.005	<0.005	<0.015	<0.025
1,2-Dichloropropane	0.005	<0.005	<0.005	<0.015	<0.025
cis-1,3-Dichloropropene	0.005	<0.005	<0.005	<0.015	<0.025
Trichloroethene	0.005	<0.005	<0.005	<0.015	**0.067**
Dibromochloromethane	0.005	<0.005	<0.005	<0.015	<0.025

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-09-93

ANALYTICAL RESULTS

Volatile Organics in Soil
Modified EPA Method 8240[a]

GTEL Sample Number		01	02	03	04
Client Identification		PTNB	STNB	PTBS	STBS
Date Sampled		07-28-93	07-28-93	07-28-93	07-28-93
Date Analyzed		08-02-93	08-02-93	08-02-93	08-02-93
Dilution Multiplier[b]		1	1	3	5
Analyte	Reporting Limit, mg/kg	Concentration, mg/kg			
1,1,2-Trichloroethane	0.005	<0.005	<0.005	<0.015	<0.025
Benzene	0.005	<0.005	<0.005	<0.015	<0.025
2-Chloroethylvinyl Ether	0.010	<0.010	<0.010	<0.030	<0.050
trans-1,3-Dichloropropene	0.005	<0.005	<0.005	<0.015	<0.025
Bromoform	0.005	<0.005	<0.005	<0.015	<0.025
4-Methyl-2-Pentanone	0.020	<0.020	<0.020	<0.060	<0.10
2-Hexanone	0.020	<0.020	<0.020	<0.060	<0.10
Tetrachloroethene	0.005	<0.005	<0.005	**0.47**	**9.4**
1,1,2,2-Tetrachloroethane	0.005	<0.005	<0.005	<0.015	<0.025
Toluene	0.005	<0.005	<0.005	**0.055**	**0.74**
Chlorobenzene	0.005	<0.005	<0.005	<0.015	<0.025
Ethylbenzene	0.005	<0.005	<0.005	<0.015	**0.75**
Styrene	0.005	<0.005	<0.005	<0.015	<0.025
Xylenes (total)	0.005	<0.005	<0.005	**4.2**	**24**
1,2-Dichlorobenzene	0.010	<0.010	<0.010	<0.030	<0.050
1,3-Dichlorobenzene	0.010	<0.010	<0.010	<0.030	<0.050
1,4-Dichlorobenzene	0.010	<0.010	<0.010	<0.030	<0.050
Percent Solids	%	90.1	91.9	94.5	79.2

a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA November 1986; Heated purge and trap for sample preparation. This method is modified for megabore column use and additional compounds. Results are calculated on a wet weight basis.

b Dilution multiplier indicates the adjustments made for sample dilution.

c Total 1,2-dichloroethene is the sum of the cis- and trans- isomers.

NOTE: Sample temperature when received at the laboratory was 6°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-09-93

ANALYTICAL RESULTS

Volatile Organics in Soil
Modified EPA Method 8240[a]

GTEL Sample Number		05	06	07	08
Client Identification		EW	SW	WW	NW
Date Sampled		07-28-93	07-28-93	07-28-93	07-28-93
Date Analyzed		08-02-93	08-02-93	08-02-93	08-02-93
Dilution Multiplier[b]		1	5	1	1
Analyte	Reporting Limit, mg/kg	Concentration, mg/kg			
Chloromethane	0.010	<0.010	<0.050	<0.010	<0.010
Bromomethane	0.010	<0.010	<0.050	<0.010	<0.010
Vinyl Chloride	0.010	<0.010	<0.050	<0.010	<0.010
Chloroethane	0.010	<0.010	<0.050	<0.010	<0.010
Methylene Chloride	0.010	<0.010	<0.050	<0.010	<0.010
Acetone	0.020	<0.020	**0.42**	<0.020	<0.020
Carbon Disulfide	0.005	<0.005	<0.025	<0.005	<0.005
1,1-Dichloroethene	0.005	<0.005	<0.025	<0.005	<0.005
1,1-Dichloroethane	0.005	<0.005	**0.027**	<0.005	<0.005
1,2-Dichloroethene (total)[c]	0.005	<0.005	**0.071**	<0.005	<0.005
Chloroform	0.005	<0.005	<0.025	<0.005	<0.005
1,2-Dichloroethane	0.005	<0.005	<0.025	<0.005	<0.005
2-Butanone	0.020	<0.020	<0.10	<0.020	<0.020
1,1,1-Trichloroethane	0.005	<0.005	**0.088**	<0.005	<0.005
Carbon Tetrachloride	0.005	<0.005	<0.025	<0.005	<0.005
Vinyl Acetate	0.020	<0.020	<0.10	<0.020	<0.020
Bromodichloromethane	0.005	<0.005	<0.025	<0.005	<0.005
1,2-Dichloropropane	0.005	<0.005	<0.025	<0.005	<0.005
cis-1,3-Dichloropropene	0.005	<0.005	<0.025	<0.005	<0.005
Trichloroethene	0.005	<0.005	<0.025	<0.005	<0.005
Dibromochloromethane	0.005	<0.005	<0.025	<0.005	<0.005

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-09-93

ANALYTICAL RESULTS

Volatile Organics in Soil
Modified EPA Method 8240[a]

GTEL Sample Number		05	06	07	08
Client Identification		EW	SW	WW	NW
Date Sampled		07-28-93	07-28-93	07-28-93	07-28-93
Date Analyzed		08-02-93	08-02-93	08-02-93	08-02-93
Dilution Multiplier[b]		1	5	1	1
Analyte	Reporting Limit, mg/kg	Concentration, mg/kg			
1,1,2-Trichloroethane	0.005	<0.005	<0.025	<0.005	<0.005
Benzene	0.005	<0.005	<0.025	<0.005	<0.005
2-Chloroethylvinyl Ether	0.010	<0.010	<0.050	<0.010	<0.010
trans-1,3-Dichloropropene	0.005	<0.005	<0.025	<0.005	<0.005
Bromoform	0.005	<0.005	<0.025	<0.005	<0.005
4-Methyl-2-Pentanone	0.020	<0.020	<0.10	<0.020	<0.020
2-Hexanone	0.020	<0.020	<0.10	<0.020	<0.020
Tetrachloroethene	0.005	<0.005	**0.085**	<0.005	<0.005
1,1,2,2-Tetrachloroethane	0.005	<0.005	<0.025	<0.005	<0.005
Toluene	0.005	<0.005	**0.29**	<0.005	<0.005
Chlorobenzene	0.005	<0.005	<0.025	<0.005	<0.005
Ethylbenzene	0.005	<0.005	**0.20**	<0.005	<0.005
Styrene	0.005	<0.005	<0.025	<0.005	<0.005
Xylenes (total)	0.005	<0.005	**19**	<0.005	<0.005
1,2-Dichlorobenzene	0.010	<0.010	<0.050	<0.010	<0.010
1,3-Dichlorobenzene	0.010	<0.010	<0.050	<0.010	<0.010
1,4-Dichlorobenzene	0.010	<0.010	<0.050	<0.010	<0.010
Percent Solids	%	85.1	85.9	89.3	90.9

a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA November 1986; Heated purge and trap for sample preparation. This method is modified for megabore column use and additional compounds. Results are calculated on a wet weight basis.

b Dilution multiplier indicates the adjustments made for sample dilution.

c Total 1,2-dichloroethene is the sum of the cis- and trans- isomers.

NOTE: Sample temperature when received at the laboratory was 6°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-13-93

ANALYTICAL RESULTS

Total Petroleum Hydrocarbons as Mineral Spirits in Soil
GC/FID[a]

Sample Identification		Date Sampled	Date Extracted	Date Analyzed	Concentration, mg/kg	Reporting Limit, mg/kg	% Solids
GTEL No.	Client ID						
01	PTNB	07-28-93	08-04-93	08-11-93	15[b]	10	90.1
02	STNB	07-28-93	08-04-93	08-11-93	590[bc]	10	91.9
03	PTBS	07-28-93	08-04-93	08-11-93	4600	10	94.5
04	STBS	07-28-93	08-04-93	08-11-93	17000	10	79.2
05	EW	07-28-93	08-04-93	08-12-93	<10	10	85.1
06	SW	07-28-93	08-04-93	08-12-93	7500	10	85.9
07	WW	07-28-93	08-04-93	08-13-93	<10	10	89.3
08	NW	07-28-93	08-04-93	08-11-93	<10	10	90.9

a ASTM Method D3328 (modified) is used for qualitative identification of fuel patterns. The method has been modified to include quantitation by applying calibration and quality assurance guidelines outlined in EPA's publication, Test Methods for Evaluating Solid Waste, SW846, Third Edition, Revision 0, November 1986. Extraction by modified EPA Method 3550. Results are calculated on a wet weight basis.

b Qualitative identification is uncertain because the material present does not match laboratory standards.

c Chromatographic data indicated the presence of non-target hydrocarbons.

NOTE: Sample temperature when received at the laboratory was 6°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-13-93

ANALYTICAL RESULTS

Metals In Soil[a]

		GTEL Sample Number	01	02	03	04
		Client Identification	PTNB	STNB	PTBS	STBS
		Date Sampled	07-28-93	07-28-93	07-28-93	07-28-93
		Date Digested	08-10-93	08-10-93	08-10-93	08-10-93
		Date Analyzed	08-12-93	08-12-93	08-12-93	08-12-93
Analyte	Method	QL,* mg/Kg	Concentration, mg/Kg			
Cadmium	EPA 6010	0.5	<0.5	<0.5	<0.5	<0.5
Chromium	EPA 6010	1	**6**	**6**	**5**	**6**
Lead	EPA 6010	10	<10	<10	<10	<10

		GTEL Sample Number	05	06	07	08
		Client Identification	EW	SW	WW	NW
		Date Sampled	07-28-93	07-28-93	07-28-93	07-28-93
		Date Digested	08-10-93	08-10-93	08-10-93	08-10-93
		Date Analyzed	08-12-93	08-12-93	08-12-93	08-12-93
Analyte	Method	QL,* mg/Kg	Concentration, mg/Kg			
Cadmium	EPA 6010	0.5	<0.5	<0.5	<0.5	<0.5
Chromium	EPA 6010	1	**7**	**7**	**26**	**6**
Lead	EPA 6010	10	<10	**18**	<10	<10

* Quantitation Limit.
a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA November 1986; Digestion by Method 3050 except when method specific.

NOTE: Sample temperature when received at the laboratory was 6°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

ALBUQUERQUE

CHAIN-OF-CUSTODY RECORD

Page 1 of 2

Project No.:	Today's Date:	Date Results Requested:
738	28 July 93	

Sampler's Name:	Phone No.:	Fax No.:
Jeff Weber	307-745-7474	307-745-7729

Company Name and Address:
TriHydro Corporation
920 Sheridan Street
Laramie, WY 82070

Company Contact: Jack Bedessem

Collector's Sample No.	~~Sample Matrix~~ DATE	TIME	~~Time Sampled~~ MATRIX	No. of Containers	Volatile Organic Compounds (8240)			Mineral Spirits (MOD 8015)			Total: Cadmium	Chromium	Lead	Analyses Requested
PTNB	7/28/93	1115	SOIL	3	✓			✓			✓	✓	✓	01
STNB		1055			✓			✓			✓	✓	✓	02
PTBS		1415			✓			✓			✓	✓	✓	03
STBS		1430			✓			✓			✓	✓	✓	04
EW		1135			✓			✓			✓	✓	✓	05
SW		1545			✓			✓			✓	✓	✓	06
WW		1605			-			✓			✓	✓	✓	07
NW		1125			✓			✓			✓	✓	✓	08

USDA-525

Seals intact 6°C

Remarks:

Auth # RM2509102485 82

Relinquished by:	Affiliation:	Date/Time:	Received by:	Affiliation:	Date/Time:
[signature]	TRIHYDRO	7/29/93 1410			
Relinquished by:	Affiliation:	Date/Time:	Received by:	Affiliation:	Date/Time:
Relinquished by:	Affiliation:	Date/Time:	Received by: Sandra Cam	Affiliation: ATEL	Date/Time: 7/30/93 0810

Were samples received in good condition?

Remarks:

APPENDIX F

ANALYTICAL RESULTS OF WOOD FROM RETURN/FILL STATION

CLOSURE CERTIFICATION REPORT
PARTIAL FACILITY CLOSURE
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD 000804294

GTEL
ENVIRONMENTAL
LABORATORIES, INC.

Midwest Region
4211 May Avenue
Wichita, KS 67209
(316) 945-2624
(800) 633-7936
(316) 945-0506 (FAX)

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485

AUG 1 3 1993

#738
DATA

Jack Bedessem
TriHydro Corporation
920 Sheridan Street
Laramie, WY 82070

Dear Mr. Bedessem:

Enclosed please find the analytical results for samples received by GTEL Environmental Laboratories on 07-30-93.

A formal quality control/quality assurance program is maintained by GTEL, which is designed to meet or exceed the EPA requirements. Analytical work for this project met QA/QC criteria unless otherwise stated in the footnotes.

GTEL is certified by the State of Kansas under Certification #E-103 and #E-1113.

If you have any questions concerning this analysis, or if we can be of further assistance, please call our Customer Service Representative.

Sincerely,

Ronda K Kennedy/Extractables Mgr.

Terry R. Loucks
Laboratory Director

GTEL Wichita, KS
COVLET.SET

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-11-93

ANALYTICAL RESULTS

Volatile Organics in TCLP Leachate[a]
EPA Method 8240 Modified

GTEL Sample Number		09			
Client Identification		WOOD			
Date Sampled		07-29-93			
Date Leached		08-05-93			
Extraction Fluid		#1			
Date Analyzed		08-06-93			
Dilution Multiplier[b]		1			
Analyte	Reporting Limit, mg/L	Concentration, mg/L			
Benzene	0.050	<0.050			
Carbon tetrachloride	0.050	<0.050			
Chlorobenzene	0.050	<0.050			
Chloroform	0.050	<0.050			
1,4-Dichlorobenzene	0.050	<0.050			
1,2-Dichloroethane	0.050	<0.050			
1,1-Dichloroethylene	0.050	<0.050			
Methyl ethyl ketone	0.20	<0.20			
Tetrachloroethylene	0.050	<0.050			
Trichloroethylene	0.050	<0.050			
Vinyl chloride	0.10	<0.10			

a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA, November 1986. This method is modified for megabore column use. TCLP is performed as per 40 CFR, Part 261, Appendix II - Method 1311. These data are presented in accordance with the Federal Register 57, p. 55114, November 24, 1992.

b Dilution multiplier indicates the adjustments made for sample dilution.

NOTE: Sample temperature when received at the laboratory was 6°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-13-93

ANALYTICAL RESULTS

Semivolatile Organics in TCLP Leachate[a]
EPA Method 8270[b]

GTEL Sample Number		09			
Client Identification		WOOD			
Date Sampled		07-29-93			
Date Leached		08-04-93			
Date Extracted		08-06-93			
Extraction Fluid		#1			
Date Analyzed		08-10-93			
Analyte	Quantitation Limit, mg/L	Concentration, mg/L			
o-Cresol	0.033	<0.033			
m-Cresol + p-Cresol	0.033	<0.033			
1,4-Dichlorobenzene	0.033	<0.033			
2,4-Dinitrotoluene	0.033	<0.033			
Hexachloro-1,3-butadiene	0.033	<0.033			
Hexachlorobenzene	0.033	<0.033			
Hexachloroethane	0.033	<0.033			
Nitrobenzene	0.033	<0.033			
Pentachlorophenol	0.17	<0.17			
Pyridine	0.033	<0.033			
2,4,5-Trichlorophenol	0.033	<0.033			
2,4,6-Trichlorophenol	0.033	<0.033			
Quantitation Limit Multiplier[c]		1			

a Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA, November 1986; extraction by EPA Method 3510 (liquid/liquid). TCLP performed as per 40 CFR, Part 261, Appendix II - Method 1311. These data are presented in accordance with the Federal Register, 57, p.55114, November 24, 1992.

b Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA, November 1986; extraction by EPA Method 3510 (liquid/liquid).

c The quantitation limit multiplier indicates the adjustments made to the data and detection limits for sample dilutions.

NOTE: Sample temperature when received at the laboratory was 6°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-13-93

ANALYTICAL RESULTS

Metals in TCLP Leachate[a]

GTEL Sample Number			09			
Client Identification			WOOD			
Date Sampled			07-29-93			
Date Leached			08-09-93			
Extraction Fluid			#1			
Date Analyzed (Method 7470)			08-11-93			
Date Analyzed (Method 6010)			08-12-93			
Dilution Multiplier (Method 6010)[b]			4			
Analyte	Method[c]	Reporting Limit, mg/L	Concentration, mg/L			
Arsenic	EPA 6010	.50	<2.0			
Barium	EPA 6010	1.0	<4.0			
Cadmium	EPA 6010	.050	<0.20			
Chromium	EPA 6010	.050	<0.20			
Lead	EPA 6010	.50	<2.0			
Mercury	EPA 7470	.002	<0.002			
Selenium	EPA 6010	.20	<0.80			
Silver	EPA 6010	.050	<0.20			

a TCLP performed as per 40 CFR, Part 261, Appendix II - Method 1311. These data are presented in accordance with the Federal Register, 57, p.55114, November 24, 1992.

b The dilution multiplier indicates the adjustments made for dilutions.

c Test Methods for Evaluating Solid Waste, SW-846, Third Edition, Revision 0, US EPA, November 1986; Digestion by Method 3010 for Method 6010 analytes and Method 7470 for mercury.

NOTE: Sample temperature when received at the laboratory was 6°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

GTEL Client Number: TR102.SFK01
Project ID (Number): 738
Project ID (Name): SK - Albuquerque, NM
Work Order Number: W3-07-0485
Date Reported: 08-13-93

ANALYTICAL RESULTS

Inorganics In Soil

GTEL Sample Number			09			
Client Identification			WOOD			
Date Sampled			07-29-93			
Date Analyzed			08-04-93			
Analyte	Method	QL[a] & Units	Concentration			
Closed Cup Flashpoint	ASTM D-93	NA°F	145[a]			

a Ignitability of solid waste is not regulated by EPA and no official method exists for its determination.

* Quantitation Limit.

b Ignitability of solid waste is not regulated by EPA and no official method exists for its determination.

NA Not applicable

NOTE: Sample temperature when received at the laboratory was 6°C.

GTEL ENVIRONMENTAL LABORATORIES, INC.

Albuquerque

CHAIN-OF-CUSTODY RECORD

Page 2 of 2

Project No.:	Today's Date:	Date Results Reqeusted:
738	29 July 93	

Sampler's Name:	Phone No.:	Fax No.:
Jeff Weber	307-745-7474	307-745-7729

Company Name and Address:
TriHydro Corporation
920 Sheridan Street
Laramie, WY 82070

Company Contact: Jack Bodessem

Analyses Requested

Collector's Sample No.	Sample Matrix	Date Sampled/ Time Sampled	No. of Containers	TCLP	VOC's	Semi VOC's	Metals	Ignitability (3)	Paint Filter	
WOOD	Solid	7/29/93 10:00-14:00	4		✓	✓	✓	✓	09	

W3070485

seals intact 6°C

Remarks:

Relinquished by:	Affiliation:	Date/Time:	Received by:	Affiliation:	Date/Time:
[signature]	TRIHYDRO	7/29/93 1411			
Relinquished by:	Affiliation:	Date/Time:	Received by:	Affiliation:	Date/Time:
Relinquished by:	Affiliation:	Date/Time:	Received by: Sandra Cox	Affiliation: ARCL	Date/Time: 7/30/93 0810

Were samples received in good condition?

Remarks: