



October 7, 1994

Mr. Allyn M. Davis, Director
Hazardous Waste Management Division
USEPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
ATTN: Mr. Rich Mayer

Re: Quarterly Progress Report (July - September 1994), HSWA
Portion of Permit, Safety-Kleen Corp. Service Center, Albu-
querque, New Mexico (NMD 000804294)

Dear Mr. Davis:

The New Mexico Environment Division (NMED) and USEPA - Region 6 issued a joint Hazardous Waste Permit for the Safety-Kleen Corp. (S-K) service center in Albuquerque, New Mexico. The HSWA portion of the Permit (Module V) became effective on January 11, 1992. Module V of the Permit primarily addresses the corrective action requirements for solid waste management units (SWMUs).

Table 1 of Module V identifies SWMU No. 4 as a spent solvent sludge tank based on the results of a RCRA Facility Assessment (RFA). The HSWA conditions of the Permit required further investigation to evaluate potential impacts/degradation due to a release from SWMU No. 4, an alleged underground storage tank (UST). The HSWA conditions also required implementation of corrective action, if necessary.

This quarterly report is being submitted to comply with the reporting requirements in Section E Module V. Section E requires submittal of quarterly reports which describe all activities conducted pursuant to the provisions of Module V. This quarterly report covers the period of July through September 1994 and includes a brief chronology of recent pertinent events.

Summary of Pertinent Events and
Work Completed During Reporting Period

1. In a letter dated June 22, 1992, S-K presented a plan to sample soils underlying the spent solvent sludge tank, if

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present. S-K also proposed to coordinate the sampling with the interim status closure and assessment activities.

2. In a letter dated June 30, 1992, USEPA approved the Workplan and requested the RFI report be submitted by January 2, 1993. The RFI Workplan consisted of documents dated May 18 and June 22, 1993.
3. In a letter dated December 23, 1992, S-K requested an extension of the RFI report deadline so the sampling could be coordinated with the interim status closure activities. Subsequently, USEPA approved the extension to October 31, 1993.
4. S-K initiated the interim status closure and assessment activities between May and August 1993. The alleged sludge UST (SWMU No. 4) was not encountered during the closure activities; however, an assessment was performed to evaluate the extent of subsurface impacts due to the product mineral spirits release.
5. The results of previous investigations and the closure assessment activities indicated the subsurface impacts were due primarily to mineral spirits and associated constituents. In a report dated October 28, 1993, S-K submitted the results of the interim status closure and assessment activities. This report also included a remedial action plan to address the subsurface impacts under interim status closure and/or the NMED UST regulations.
6. In response to a discussion with USEPA on January 5, 1994, S-K submitted photodocumentation of the former USTs excavation from June and July 1993. The photographs were presented with a letter dated January 7, 1994, and provided additional evidence that the alleged sludge tank did not exist at the time of closure.
7. In letter dated January 7, 1994, USEPA approved the October 28, 1993, report and concurred with the approach of no further action regarding the alleged sludge tank (SWMU No. 4). USEPA also requested that S-K submit a request for a Class III modification (40 CFR 270.42) to remove this unit from the permit.
8. In a letter dated April 4, 1994, NMED/Hazardous and Radioactive Materials Bureau concurred that remaining subsurface impacts near the former hazardous waste UST were

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associated with the 1991 product system release, and requested that S-K submit a closure certification report. S-K submitted a closure certification report for the former hazardous waste USTs with a letter dated May 13, 1994. S-K understands that additional actions regarding subsurface impacts will be addressed through the NMED/UST program.

Summary of Findings

1. The alleged sludge tank (SWMU No. 4) should have been located between the waste mineral spirits UST and return/fill station. As previously mentioned, the alleged sludge tank (SWMU No. 4) was not encountered during removal of the interim status USTs and return/fill station.
2. The October 28, 1993, report was prepared to address the RFI reporting requirements relative to SWMU No. 4. Note, sampling could not be performed under SWMU No. 4 because this tank was not present at the site.
3. In the letter dated January 25, 1994, USEPA acknowledged that the RFI and corrective action requirements associated with SWMU No. 4 have been satisfied in accordance with the HSWA Permit conditions.
4. S-K prepared and submitted a request for a Class III modification to remove the sludge tank (SWMU No. 4) from the permit in accordance with 40 CFR 270.42. Additionally, S-K held a public meeting at the facility on September 21, 1994, to allow public comment on the permit modification. Stewart Dinwitty (NMED/HWB), Diana Luetner (S-K, Denver), Bill Caballero (S-K, Albuquerque), and Darla Jo Huff (S-K, Albuquerque) were in attendance. S-K received no public comments on the Class III modifications.

Projected Work for Next Quarterly Period

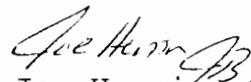
S-K anticipates that the Class III modifications will be finalized in approximately two weeks (mid-October 1994). Once the Class III modifications have been finalized, S-K believes that the Module V permit requirements and USEPA concerns have been satisfied with

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respect to SWMU No. 4 (alleged sludge tank). Therefore, S-K anticipates that this will be the final Module V compliance quarterly progress report submitted to USEPA at this time. S-K will address future Module V issues, if necessary.

S-K appreciates the USEPA - Region 6 cooperation and assistance with this project. If you have any questions, please contact Jack Bedessem (TriHydro Corporation) at (307) 745-7474 or me at (713) 261-2015.

Sincerely,
SAFETY-KLEEN CORP.



Joe Herrin, CHMM, PG
Senior Project Manager - Remediation

ahj/23-02

cc: Gary Long (S-K)
Diana Leutner (S-K Denver)
Darla Jo Huff (S-K Albuquerque)
Marc Sides (NMED)
TriHydro Corporation