

Safty-Kleen
Albuquerque Facility
Modified Permit

Effective 11-06-96

**STORAGE FACILITY
PERMIT APPLICATION
SAFETY-KLEEN CORP. SERVICE CENTER
ALBUQUERQUE, NEW MEXICO
NMD 000804294**

Prepared by: SAFETY-KLEEN CORP.

January 29, 1992

Revised: September, 1994

Revised: July 25, 1996

CERTIFICATION STATEMENT

Albuquerque, New Mexico Service Center

NMD 000804294

The undersigned, being a vice president of Safety-Kleen Corp., the permit applicant, certifies 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 who manage the system, or those 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.



David A. Dattilo
Vice President, Sales and Service



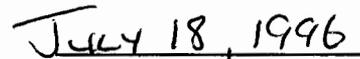
Date

ATTESTATION

The undersigned, attesting witness to the Certification Statement and this document dated _____, of which this affidavit is a part, states that I am personally responsible for the preparation of the document, that I personally gathered the information contained herein, and further that the information, to the best of my knowledge and belief, is true, accurate and complete.



Peter Olsen
Environment, Health and Safety Manager



Date

FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS: Safety-Kleen Corp.
1000 North Randall Road
Elgin, IL 60123
847/697-8460

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

FACILITY ADDRESS: Safety-Kleen Corp.(7-008-21)
2720 Girard NE
Albuquerque, New Mexico 87107

TELEPHONE NUMBER: 505/884-2277

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

GEOGRAPHIC LOCATION: 35° 06' 44" N
106° 36' 46" W

OWNER: Safety-Kleen Corp.
1000 North Randall Road
Elgin, IL 60123
847/697-8460

DATE OPERATIONS BEGAN: March 1, 1977

DESCRIPTION OF ACTIVITIES

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

PROPERTY DESCRIPTION: 1.05 acres with the following structures:

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

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

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT (GAL.)	MATERIAL TO BE STORED
Tank	12,000	see note 1	Spent Solvent (D001) and the codes listed in note 2 below)
West Container Storage Warehouse	4,310	431	Spent Immersion Cleaner (F002, F004 and the codes listed in note 2 below) Dry Cleaning Waste (F002 and the codes listed in note 2 below) Spent Solvent (and the codes listed in note 2 below)
East Container Storage Warehouse	2,680	268	Spent Immersion Cleaner (F002, F004 and the codes listed in note 2 below) Dry Cleaning Waste (F002 and the codes listed in note 2 below) Spent Solvent (and the codes listed in note 2 below)
Flammable Storage Building	9,650	965	Paint waste (D001, F003, F005 and the codes listed in note 2 below), spent solvent and dumpster sediment

- notes: 1. Secondary containment consists of a double-walled tank.
2. D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D039, D040, D041, D042, and D043

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MODULE I - GENERAL PERMIT CONDITIONS

I.A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this Permit. Any storage of hazardous waste requiring a permit under the New Mexico Hazardous Waste Management Regulations (HWMR-6), part V and not specifically authorized in this Permit is prohibited. Subject to HWMR-6, Part IX, 40 CFR 270.4, compliance with this Permit during its term constitutes compliance, for purposes of enforcement, with the New Mexico Hazardous Waste Act (Sections 74-4-1 et seq. NMSA 1978) and HWMR-6, Pts. V, VII and IX, only for those management practices specifically authorized by this Permit. The Permittee is also required to comply with HWMR-6, Pts. I, II, III and IV to the extent the requirements of those Parts are applicable. The Permittee must also comply with all applicable self-implementing provisions imposed by the Resource Conservation and Recovery Act (RCRA) or HWMR-6, Pt. VIII. A Complete RCRA Permit consists of this permit and a US EPA Permit issued under provisions of the Hazardous and Solid Waste Amendments of 1984 (HSWA) which addresses the portion of the RCRA program for which the state is not authorized. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 106(a), 104 or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment. (HWMR-6, Pt. IX, § 270.4, 270.30(g))

I.B. PERMIT ACTIONS

I.B.1. Permit Modification, Revocation and Reissuance, and Termination

This Permit may be modified, revoked and reissued, or terminated for cause, as specified in HWMR-6, Pt. IX, § 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition. (HWMR-6, Pt. IX, § 270.4(a) and 270.30(f))

I.B.2. Permit Renewal

This Permit may be renewed as specified in HWMR-6, Pt. IX, § 270.30(b) and Permit Condition I.E.2. Review of any application for a Permit renewal shall consider improvements in the state of control and measurement technology, as well as changes in applicable regulations. (HWMR-6, Pt. IX, § 270.30(b))

I.C. SEVERABILITY

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. (HWMR-6, Pt.X Section 1003)

I.D. DEFINITIONS

For purposes of this Permit, terms used herein shall have the same meaning as those in HWMR-6, Pts. I, V, VII, VIII, IX unless this Permit specifically provides otherwise; where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. "Secretary" means the Secretary of the New Mexico Environment Department (NMED), or his designee or authorized representative. "Regional Administrator" means the Regional Administrator of EPA Region VI or his designee or authorized representative.

I.E. DUTIES AND REQUIREMENTS

I.E.1. Duty to Comply

The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an Emergency Permit. Any Permit noncompliance, other than noncompliance authorized by an emergency Permit, constitutes a violation of RCRA and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. (HWMR-6, Pt. IX, § 270.30(a))

I.E.2. Duty to Reapply

If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee shall submit a complete application for a new Permit at least 180 days prior to Permit expiration. (HWMR-6, Pt. IX, § 270.10(h), 270.30(b))

I.E.3. Permit Expiration

Pursuant to HWMR-6, Pt. IX, § 270.50, this Permit shall be effective for a fixed term not to exceed ten years. As long as NMED is the Permit-issuing authority, this Permit and all conditions herein will remain in effect beyond the Permit's expiration date, if the Permittee has submitted a timely, complete application (see HWMR-6, Pt. IX, § 270.10, 270.13 through 270.29) and, through no fault of the Permittee, the Secretary has not issued a new Permit, as set forth in § 270.51.

I.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee, in an enforcement action that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit. (HWMR-6, Pt. IX, § 270.30(c))

I.E.5. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable, to prevent significant adverse impacts on human health or the environment. (HWMR-6, Pt. IX, § 270.30(d))

I.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit. (HWMR-6, Pt. IX, § 270.30(e))

I.E.7. Duty to Provide Information

The Permittee shall furnish to the Secretary, within a reasonable time, any relevant information which the Secretary may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Secretary, upon request, copies of records required to be kept by this Permit. (HWMR-6, Pt. V, § 264.74(a), Pt. IX, § 270.30(h))

I.E.8. Inspection and Entry

Pursuant to HWMR-6, Pt. IX, § 270.30(i), the Permittee shall allow the Secretary, or an authorized representative, upon the presentation of credentials and other documents, as may be required by law, to:

I.E.8.a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;

- I.E.8.b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- I.E.8.c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- I.E.8.d. Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by Hazardous Waste Act, any substances or parameters at any location.

I.E.9. Monitoring and Records

- I.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample must be described in Permit Attachment A (the Waste Analysis Plan) or be approved by the Secretary. Analytical methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, Standard Methods of Wastewater Analysis, or an equivalent method, as specified in Permit Attachment A or approved by the Secretary. (HWMR-6, Pt. IX, § 270.30(j)(1))
- I.E.9.b. The Permittee shall retain records of all monitoring sampling, and analytical information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, the certification (concerning waste minimization) required by HWMR-6, Pt. V, § 264.73(b)(9), and records of all data used to complete the application for this Permit for a period of at least 3 years from the date of the sample, measurement, report, record, certification, or application. These periods may be extended by request of the Secretary at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility. (HWMR-6, Pt. V, § 264.74(b) and 270.30(j)(2))
- I.E.9.c. Pursuant to HWMR-6, Pt. IX, § 270.30(j)(3), records of monitoring sampling, and analytical information shall specify:
 - i. The dates, exact place, and times of sampling or measurements;
 - ii. The individuals who performed the sampling or measurements;
 - iii. The dates analyses were performed;

- iv. The individuals who performed the analyses;
- v. The analytical techniques or methods used; and
- vi. The results of such analyses.

I.E.10. Reporting Planned Changes

The Permittee shall give notice to the Secretary, as soon as possible, of any planned physical alterations or additions to the Permitted facility. (HWMR-6, Pt. IX, § 270.30(l)(1))

I.E.11. Reporting Anticipated Noncompliance

The Permittee shall give advance notice to the Secretary of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. (HWMR-6, Pt. IX, § 270.30(l)(2))

I.E.12. Transfer of Permits

This Permit is not transferable to any person, except after notice to the Secretary. The Secretary may require modification or revocation and reissuance of the Permit pursuant to HWMR-6, Pt. V, § 264.12(c) and Pt. IX, § 270.40. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of HWMR-6, Pt. V and IX, and this Permit. HWMR-6, Pt. IX, § 270.30(l)(3), Pt. V, § 264.12(c)

I.E.13. Twenty-Four Hour Reporting

I.E.13.a. The Permittee shall report to the Secretary any spill, release, fire, explosion, or other occurrence which involves a quantity of hazardous waste greater than one pound which escapes the secondary containment, or which might endanger human health or the environment. This report must be made orally within twenty-four hours from the time the Permittee first becomes aware of the situation. It must be made even if the contingency plan is not implemented. The report shall include:

- i. Name, address, and telephone number of the owner or operator;
- ii. Name, address, and telephone number of the facility;
- iii. Date, time, and type of incident;

- iv. Name and quantity of materials involved;
- v. The extent of injuries, if any;
- vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
- vii. Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.13.b. A written submission shall also be provided within five days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Regional Administrator may waive the five-day written notice requirement in favor of a written report within 15 days. (HWMR-6, Pt. IX, § 270.30(l)(6))

I.E.14. Other Noncompliance

The Permittee shall report all other instances of noncompliance, not otherwise required to be reported above, Permit Conditions I.E.1. and I.E.13., as soon as the Permittee becomes aware of them. The reports shall contain the information listed in Permit Condition I.E.13.b (HWMR-6, Pt. IX, § 270.30(l)(10))

I.E.15. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the Permit application, or submitted incorrect information in a Permit application or in any report to the Secretary, the Permittee shall promptly submit such facts or information. (HWMR-6, Pt. IX, § 270.30(l)(11))

I.E.16. Administrative Changes to Facility Not Requiring a Permit Modification

Semi-annually (June 30 and December 31) unless otherwise necessary, the permittee is required to submit to the Secretary of New Mexico Environment Department, hereafter referred to as Secretary, a notice and any required updates to permit information listed in section I.E.16.a of the permit. Changes to these items do not require a modification of the permit as indicated in section I.B.1 above. The notice shall indicate any changes initiated by Safety-Kleen in the previous 6 month period

and shall be accompanied by two copies of each updated item listed in section I.E.16.a. If no changes have been made to the items listed in section I.E.16.a, the permittee shall send a notice to the Secretary indicating that no changes have been made.

- I.E.16.a The following items are administrative information items that do not require a permit modification to change:
- i. Emergency Information contact sheet;
 - ii. Letters of notification to emergency response agencies;
 - iii. Annual recharacterization analysis results;
 - iv. Daily inspection forms (Changes to the daily inspection forms require the approval of the department prior to implementation but are not subject to the requirements of section I.B.1 of this permit); and
 - v. Updated facility drawings and diagrams that do not reflect changes to the facility.
 - vi. Closure Cost Estimate Updates - to be submitted by March 1, annually.

I.F. SIGNATORY REQUIREMENT

All applications, reports, or information submitted to or requested by the Secretary, his designee, or authorized representative, shall be signed and certified in accordance with HWMR-6, Pt. IX, § 270.11 and 270.30(k).

I.G. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE SECRETARY

All reports, notifications, or other submissions which are required by this Permit to be sent or given to the Secretary should be sent by certified mail or given to:

Program Manager, RCRA Permits Program
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
P.O. Box 26110, 2044 Galisteo Street
Santa Fe, New Mexico 87505-2100

I.H. CONFIDENTIAL INFORMATION

In accordance with HWMR-6, Pt. IX, § 270.12, the Permittee may claim confidential any information required to be submitted by this Permit.

I.I. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by HWMR-6, Pt. V, § 264.13 and this Permit.
2. Inspection schedules, as required by HWMR-6, Pt. V, § 264.15(b)(2) and this Permit.
3. Personnel training documents and records, as required by HWMR-6, Pt. V, § 264.16(d) and this Permit.
4. Contingency Plan, as required by HWMR-6, Pt. V, § 264.53(a) and this Permit.
5. Operating record, as required by HWMR-6, Pt. V, § 264.73 and this Permit.
6. Closure Plan, as required by HWMR-6, Pt. V, § 264.112(a) and this Permit.
7. Annually-adjusted cost estimate for facility closure, as required by HWMR-6, Pt. V, § 264.142(d) and this Permit.
8. All other documents required by Module I, Permit Condition E.9, Module II, Permit Condition II.H.6 and Module III, Permit Condition III.B.3.a.ii.

I.J. PERMIT CONSTRUCTION

I.J.1. CITATIONS

Whenever paragraphs of this Permit or of the Hazardous Waste Management Regulations are cited, such citations include all subordinate sections of the cited paragraph. When subordinate sections are cited, such citations include all subsections of the cited subparagraphs. All such citations shall be considered an inclusion by reference to this Permit in accordance with HWMR-6, Pt. IX.

I.J.2. GENDER

Whenever the pronoun "he" is used in reference to the Secretary of the New Mexico Environment Department or the Permittee, it is to be read as "she" in any instance where the object of the reference is female.

MODULE II - GENERAL FACILITY CONDITIONS

II.A. DESIGN AND OPERATION OF FACILITY

The Permittee shall construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or nonsudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, as required by HWMR-6, Pt. V, § 264.31. The Permittee shall maintain the structures and equipment and follow the procedures described in Permit Attachments A through G.

II.B. REQUIRED NOTICES

II.B.1. Hazardous Waste Imports

This permit does not allow the Permittee to accept wastes from a foreign source. If the Permittee is to receive hazardous waste from a foreign source, he shall apply and receive a permit modification in accordance with HWMR-6, Part IX, 40 CFR §270.41 or §270.42 prior to accepting such waste.

II.B.2. Hazardous Waste from Off-Site Sources

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate Permits, and will accept the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (HWMR-6, Part V, 40 CFR §264.12(b))

II.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the waste analysis procedures required by HWMR-6, Pt. V, 40 CFR §264.13, as described in the attached Waste Analysis Plan, Permit Attachment A.

The Permittee shall verify the analysis of each waste stream according to the schedule set out in Permit Attachment A. Any sampling, testing, or analytical methods not specifically described in Permit Attachment A must be as specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, or equivalent methods approved by the Secretary. At a minimum, the Permittee shall maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. If the Permittee uses a contract laboratory to perform analyses, then the Permittee shall inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this Permit.

II.D. SECURITY

The Permittee shall comply with the security provisions of HWMR-6, Pt. V, §264.14(b)(2) and (c) and Permit Attachment B (Security Measures).

II.E. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection schedule set out in Permit Attachment C (Inspection Procedures). The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by HWMR-6, Pt. V, § 264.15(c). Records of inspection shall be kept, as required by HWMR-6, Pt. V, § 264.15(d) and by Module I, Permit Condition I.1.2.

II.F. PERSONNEL TRAINING

The Permittee shall conduct personnel training, as required by HWMR-6, Pt. V, § 264.16. This training program shall follow the attached outline, Permit Attachment D (Personnel Training). The Permittee shall maintain training documents and records, as required by HWMR-6, Pt. V, § 264.16(d) and (e).

II.G. SPECIAL PROVISIONS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of HWMR-6, Pt. V, § 264.17(a). The Permittee shall follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Permit Attachment E (Waste Handling Practices).

II.H. PREPAREDNESS AND PREVENTION

II.H.1. Required Equipment

At a minimum, the Permittee shall maintain at the facility the equipment set forth in the Permit Attachment E (Waste Handling Practices) and Permit Attachment F (Contingency Plan), as required by HWMR-6, Pt. V, § 264.32.

II.H.2. Testing and Maintenance of Equipment

The Permittee shall test and maintain the equipment specified above in Permit Condition II.I.1, as necessary, to assure its proper operation in time of emergency, as required by HWMR-6, Pt. V, § 264.33.

II.H.3. Access to Communications or Alarm System

The Permittee shall maintain access to the communications or alarm system, as required by HWMR-6, Pt. V, § 264.34.

II.H.4. Required Aisle Space

At a minimum, the Permittee shall maintain aisle space, as required by HWMR-6, Pt. V, § 264.35 and the attached plans and specifications, Permit Attachment E.

II.H.5. Arrangements with Local Authorities

The Permittee shall maintain Preparedness and Prevention arrangements with state and local authorities, as required by HWMR-6, Pt. V, § 264.37. If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

II.H.6. The Permittee will maintain in an accessible location a current inventory showing type, location and quantity of hazardous materials and hazardous waste at the facility.

II.I. CONTINGENCY PLAN

II.I.1. Implementation of Plan

The Permittee shall immediately carry out the provisions of the Contingency Plan, Permit Attachment E, whenever there is a fire, explosion, or release of hazardous waste or constituents which could threaten human health or the environment.

II.I.2. Copies of Plan

The Permittee shall maintain and distribute copies of the Contingency Plan in accordance with the requirements of HWMR-6, PT.V, § 264.53.

II.I.3. Amendments to Plan

The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by HWMR-6, Pt. VI, § 264.54.

II.I.4. Emergency Coordinator

A trained emergency coordinator shall be available at all times in case of an emergency, as required by HWMR-6, Pt. V, § 264.55.

II.J. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of HWMR-6, Pt. V, §§ 264.71, 264.72, and 264.76.

II.K. RECORDKEEPING AND REPORTING

In addition to the recordkeeping and reporting requirements specified elsewhere in this Permit, the Permittee shall do the following:

II.K.1. Operating Record

The Permittee shall maintain a written operating record at the facility, as required by HWMR-6, Pt. V, § 264.73.

II.K.2. Biennial Report

The Permittee shall comply with the biennial reporting requirements of HWMR-6, Pt. V, § 264.75.

II.L. GENERAL CLOSURE REQUIREMENTS

II.L.1. Performance Standard

The Permittee shall close the facility, as required by HWMR-6, Pt. V, § 264.111 and in accordance with Permit Attachment G (the Closure Plan).

II.L.2. Amendment to Closure Plan

The Permittee shall amend the Closure Plan, in accordance with HWMR-6, Pt. V, § 264.112(c), whenever necessary.

II.L.3. Notification of Closure

The Permittee shall notify the Secretary in writing at least 45 days prior to the date on which he expects to begin closure of any of the facility as required by HWMR-6, Pt. V, § 264.112(d).

II.L.4. Time Allowed For Closure

After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the unit or facility all hazardous waste and shall complete closure activities, in accordance with HWMR-6, Pt. V, § 264.113 and the schedules specified in Permit Attachment G (the Closure Plan).

II.L.5. Disposal or Decontamination of Equipment, Structures, and Soils

The Permittee shall decontaminate or dispose of all contaminated equipment, structures, and soils, as required by HWMR-6, Pt. VI, § 264.114 and Permit Attachment G (the Closure Plan).

II.L.6. Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the Closure Plan, as required by HWMR-6, Pt. VI, § 264.115.

II.M. COST ESTIMATE FOR FACILITY CLOSURE

II.M.1. The Permittee shall keep at the facility a copy of the most recent closure cost estimate, based on the closure plan contained in Permit Attachment G and prepared in accordance with HWMR-6, Pt. V, § 264.142

II.M.2. The Permittee must adjust the closure cost estimate for inflation in accordance with the requirements of HWMR-6, Pt. V, § 264.142(b).

II.M.3. The Permittee must revise the closure cost estimate on March 1 annually as required by HWMR-6, Pt.V, § 264.142(c).

II.N. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

The Permittee shall demonstrate continuous compliance with the requirements of HWMR-6, Pt. V, § 264.143. on March 31, annually during the life of this Permit, the permittee must demonstrate continued compliance by submitting to the Secretary a copy of the documentation required by Pt. V, § 264.143 for the financial assurance mechanism(s) selected. This submission must be made at the time specified in Pt. V, § 264.143; or, if none is specified, it must be made within 30 days after the anniversary of the issuance of this Permit. Any change in the financial assurance mechanisms used to satisfy Permit Condition II.M. above, must be approved in advance by the Secretary as required by HWMR-6, Pt. V, § 264.143.

II.O. LIABILITY REQUIREMENTS

The Permittee shall demonstrate continuous compliance with the requirement of HWMR-6, Pt. V, § 264.147(a) to maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs. This demonstration must be made by submitting a signed duplicate original of the insurance policy endorsement or Certificate of Insurance annually to the Secretary. This submission must be made on or before the expiration or anniversary date of the insurance policy. The wording of the endorsement or Certificate of Insurance must be identical to the wording required in HWMR-6, Pt. V, § 264.151(i) or (j).

II.P INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

The Permittee shall comply with the provisions of HWMR-6, Pt. V, § 264.148, whenever any of the events listed in that Section should occur.

II.Q REQUIREMENTS FOR RELEASES

II.Q.1. Releases from the Container Storage Area or Tank Storage Area

If, based on information contained in reports required by Module I, Permit Conditions I.E.13.a., b. and d., the Secretary determines that a release from the container and or tank storage area is of such quantity, duration or repeated occurrence that further assessment is required, he may direct the Permittee to conduct the sampling and analysis required pursuant to HWMR-6, Pt. IX, § 270.14(d).

II.Q.2. Releases from Newly Identified Solid Waste Management Units (SWMUs)

For newly identified SWMUs, the Permittee shall fulfill the requirements of Module V, Permit Condition V.E.

MODULE III - CONTAINERS

III.A. MODULE HIGHLIGHTS

- III.A.1 This permit authorizes storage of hazardous wastes in containers in the part of the warehouse equipped with secondary containment. The secondary containment is described briefly below, and more completely in Permit Attachment E (Waste Handling Practices).
- III.A.2 The warehouse consists of a storage building, enclosing approximately 2,500 square feet. This area is further divided into offices, rest rooms, and a sales representative room, as well as two areas with secondary containment for drum storage (east and west warehouses).
- Spent immersion cleaner, spent solvent, spent dry cleaning solvents, and other dry cleaning wastes will be stored only in the warehouse container storage areas protected by a secondary containment system as described below and Permit Attachment E. Unused Safety-Kleen chemical products may be stored in the areas equipped with secondary containment. Wastes will be stored in containers meeting DOT specifications. The maximum volume of liquid (whether hazardous waste or any other liquid) that may be stored at any one time in the warehouse container storage areas equipped with secondary containment is 4,310 gallons in the West warehouse and 2,680 gallons in the East warehouse. Secondary containment is provided by a flat, sealed concrete floor surrounded by a six-inch wide by four-inch high steel reinforced concrete curbs and collection trenches. The building (including offices, representative room, and rest rooms) has a total floor space of approximately 2,500 square feet. Paint wastes, dumpster sediments and waste solvent which are considered ignitable will be stored in the H-3 Flammable Storage Building. This building has 1,242 square feet of floor space and the storage capacity is 9,650 gallons. The wastes are stored in containers meeting DOT specifications. Spill containment is provided by sloping, sealed concrete floors and collection trenches.
- III.A.3 The Permittee may store products awaiting distribution as well as hazardous waste in the storage units. However, product storage is subject to several restrictions to prevent compromising the safe storage of waste. These restrictions are set forth in Permit Conditions III.L, and include requirements that products not be stored in the same secondary containment area as any hazardous waste with which they might be incompatible, and that all liquids be counted in determining the maximum allowable liquid storage volume.
- III.A.4 The Permittee will store waste containers equivalent to the containers specified for each waste by the U.S. Department of Transportation (DOT) regulations, set forth in Title 49 of the Code of Federal Regulations, Part 173 (49 CFR §173). These

containers will meet or exceed the requirements for strength and integrity specified by DOT at 49 CFR §178 for each class of containers.

III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

III.B.1. The Permittee may store the following wastes in containers at the facility, subject to the terms of this Permit:

Description of Hazardous Waste	EPA Hazardous Waste Number	Maximum Volume (gallons)	Maximum Number and Type of Containers
Spent immersion cleaner, dry cleaner waste, spent solvent, paint waste and dumpster sediment	F002, F004, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, 3038, 3039, D040, D041, D042, D043.	16,640	Containers meeting DOT specifications.

III.B.2. The Permittee shall not store any hazardous waste in containers that is not identified in Permit Condition III.B.1 above. If the amount of any waste code handled in a calendar year exceeds the amount listed for that waste code in Permit Attachment H (Part A of the Permit Application), the situation must be reported to NMED and, if the increase in annual quantity is expected to be repeated, the Permittee shall submit a revised Part A by March 1 of the following year. The revised Part A will replace Attachment H and become part of this permit.

III.B.3. The Permittee shall comply with the following conditions (Permit Conditions III.B.3.a. through c. below) regarding storage in containers of wastes identified in HWMR-6, Part VIII, 40 CFR sections 268.10, 268.11, and 268.12 as being subject to the

restrictions on land disposal set forth in HWMR-6, Part VIII, 40 CFR Subpart C. The same conditions shall be imposed on the storage of any wastes that may become prohibited or restricted from land disposal by the New Mexico Hazardous Waste Management Regulations during the life of this permit.

III.B.3.a.

- i. Waste shall be stored for no longer than one year from the date of the first receipt by the Permittee, unless
- ii. The Permittee furnishes proof to the Secretary that such storage for a period in excess of one year is solely for the purposes of accumulation of such quantities as are necessary to facilitate proper recovery, treatment or disposal.

III.B.3.b. Each container must be clearly marked as to its contents and the date each period of accumulation begins.

III.B.3.c. Hazardous wastes meeting the treatment standards in HWMR-6, Part VIII, 40 CFR sections 268.41, 268.42, 268.43 are not subject to the storage prohibition in Permit Condition III.B.3.a. above.

III.C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., it exhibits severe rusting, or other visible structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit. (HWMR-6, Pt. V, § 264.171)

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall assure that the ability of the container to contain the waste is not impaired by any incompatibility with its contents, as required by HWMR-6, Pt. V, § 264.172.

III.E. MANAGEMENT OF CONTAINERS

The Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. (HWMR-6, Pt. V, § 264.173)

III.F. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect the container area daily, in accordance with Permit Attachment C (Inspection Procedures) to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors. (HWMR-6, Pt. V, § 264.174)

III.G. CONTAINMENT SYSTEMS

The Permittee shall maintain the containment system in a leakproof and fully operable condition in accordance with the plans and specifications, contained in Permit Attachment E. (HWMR-6, Pt. V, § 264.175)

III.H. RECORDKEEPING

The Permittee shall place the results of all waste analyses and trial tests and any other documentation showing compliance with the requirements of Permit Conditions III.K.1 and III.K.2 and HWMR-6, Pt. V, § 264.17(b) and 264.177 in the facility operating record. (HWMR-6, Pt. V, § 264.73)

III.I. CLOSURE

At closure of the container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in Permit Attachment G (the Closure Plan). (HWMR-6, Pt. V, 40 CFR § 264.178)

III.J. SPECIAL PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

III.J.1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line. (HWMR-6, Pt. V, § 264.176)

III.J.2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste, and follow the procedures specified in Permit Attachment E. (HWMR-6, Pt. V, § 264.17(a) and 264.176)

III.K. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

III.K.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container. (HWMR-6, Pt. V, 40 CFR §264.177(a))

III.K.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material. (HWMR-6, Pt. V, 40 CFR §264.177(b))

III.K.3. The Permittee shall separate containers of incompatible wastes as required by HWMR-6, Pt. V, 40 CFR §264.177(c).

III.L. STORAGE OF CHEMICAL PRODUCTS

The Permittee may store chemical products in permitted storage units, subject to the conditions set forth below:

1. No products will be stored in the area of the warehouse equipped with secondary containment that might be incompatible with any waste stored there.
2. A distinct and easily identifiable location within the storage area is set aside for products, when they are present.
3. Products are clearly identifiable as such, and differentiated from wastes.
4. The volume of all liquids, product, waste, or otherwise, is included in determining the remaining available storage capacity for liquid waste.
5. The Permittee complies with permit Conditions III.C, III.D, and III.E, substituting the word "product" for the word "wastes" when handling chemical products.
6. The current inventory of stored chemical products (type, quantity and location) is included in the facility inventory required by Permit Condition II.H.6.

MODULE IV - TANKS

IV.A. MODULE HIGHLIGHTS

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

One of the two tanks contains new solvent awaiting distribution; the other contains spent solvent awaiting return to a Safety-Kleen Recycle Center. The tank containing the spent solvent is the only tank regulated by this permit. The spent solvent is a hazardous waste because of the characteristic of ignitability and the possible characteristic of toxicity as measured by the Toxicity Characteristic Leaching Procedure.

Ancillary equipment to the waste solvent tank includes a return and fill station containing two enclosed metal cabinets which serve as sumps into which the contents of a drum of solvent can be emptied, and each cabinet contains a jet which recirculates the solvent and cleans all the sediment from the drum. All spent solvents and sediments are then pumped into the spent solvent tank. The return and fill station has a roof and is equipped with concrete secondary containment and a blind sump with a capacity of 1,548 gallons. Piping from the return and fill station is tight piped and is protected by secondary containment. The pump which provides clean solvent for filling drums is located within the secondary containment for the return and fill station and all its associated piping is located within this secondary containment. Fill pipes for emptying the spent solvent and filling the clean solvent tank (from tanker trucks) are secondarily contained.

Based on an engineer's assessment of the system, the tanks were fabricated and installed in 1992.

IV.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

IV.B.1. The permittee may store a maximum total volume of 12,000 gallons of spent solvent and associated bottom sludge {hazardous wastes on the basis of ignitability (D001) and possible TCLP toxicity (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043)} in one tank, as described and depicted in Permit Attachment E, subject to the terms of this Permit.

IV.B.2. The Permittee is prohibited from storing or treating hazardous waste that is not identified in Permit Condition IV.B.1.

IV.C. SECONDARY CONTAINMENT

IV.C.1. The Permittee shall design, construct, and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in Permit Attachment E. (HWMR-6, Pt. V, § 264.193(b)-(f))

IV.D. OPERATING REQUIREMENTS

IV.D.1. The Permittee shall not place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. (HWMR-6, Pt. V, § 264.194(a))

IV.D.2. The Permittee shall prevent spills and overflows from the tank or containment systems using the methods described in Permit Attachment E. (HWMR-6, Pt. V, § 264.194(b))

IV.E. RESPONSE TO LEAKS OR SPILLS

In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions: (HWMR-6, Pt. V, § 264.196(a)-(f))

IV.E.1. Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.

IV.E.2. Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify the Director and demonstrate that the longer time period is required.

If the collected material is a RCRA hazardous waste, it must be managed in accordance with all applicable requirements of HWMR-6, Pts. III, IV, and V. The Permittee shall note that if the collected material is discharged through a point source to U.S. waters or to a Publicly Owned Wastewater Treatment Facility, it is subject to requirements of the Clean Water Act. If the collected material is released to the environment, it may be subject to reporting under 40 CFR Part 302.

IV.E.3. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.

- IV.E.4. Close the system in accordance with the Closure Plan, Permit Attachment G, unless the following actions are taken:
- IV.E.4.a. For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.
 - IV.E.4.b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.
 - IV.E.4.c. For a release to the environment caused by a leak from the aboveground portion of the tank system that does not have secondary containment, and can be visually inspected, the Permittee shall repair the tank system before returning it to service.
 - IV.E.4.d. If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in HWMR-6, Pt. V, § 264.192 and § 264.193.
- IV.E.5. For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

IV.F. INSPECTION SCHEDULES AND PROCEDURES

- IV.F.1. The Permittee shall inspect the tank systems, in accordance with the Inspection Schedule, Permit Attachment C, and shall complete the items in Permit Conditions IV.F.2. and IV.F.3. as part of those inspections:
- IV.F.2. The Permittee shall inspect the overfill controls, in accordance with the schedule in Permit Attachment C. (HWMR-6, Pt. § 264.195(a))
- IV.F.3. The Permittee shall inspect the following components of the tank system once each operating day: (HWMR-6, Pt. V, § 264.195(b))
- IV.F.3.a. Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
 - IV.F.3.b. Data gathered from monitoring and leak detection equipment (e.g., level gauges) to ensure that the tank system is being operated

according to its design;

IV.F.3.c. Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

IV.F.4. The Permittee shall document compliance with Permit Conditions IV.F.2. through IV.F.4. and place this documentation in the operating record for the facility. (HWMR-6, Pt. V, § 264.195(d))

IV.G. RECORDKEEPING AND REPORTING

IV.G.1. The Permittee shall report to the Secretary, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. (HWMR-6, Pt. V, § 264.196(d)(1)) (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) (HWMR-6, Pt. V, § 264.196(d)(2)) (Releases that are contained within a secondary containment system need not be reported). If the Permittee has reported the release pursuant to 40 CFR Part 302, this report satisfies the requirements of this Permit Condition. (HWMR-6, Pt. V, § 264.196(d)(1))

IV.G.2. Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Secretary: (HWMR-6, Pt. V, § 264.196(d)(3))

- a. Likely route of migration of the release;
- b. Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);
- c. Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Secretary with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;
- d. Proximity of downgradient drinking water, surface water, and populated areas; and
- e. Description of response actions taken or planned.

IV.G.3. The Permittee shall submit to the Secretary all certifications of major repairs to correct leaks within seven days from returning the tank system to use. (HWMR-6, Pt. V, § 264.196(f))

IV.G.4. The Permittee shall keep on file at the facility the written assessment of the tank system's integrity. (HWMR-6, Pt. V, 40 CFR § 264.191(a))

IV.H. CLOSURE AND POST-CLOSURE CARE

IV.H.1. At closure of the tank system(s), the Permittee shall follow the procedures in the Closure Plan, Permit Attachment G. (HWMR-6, Pt. V, § 264.197(a))

IV.H.2. If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the Closure Plan, then the Permittee shall obtain a Post-Closure Care, Permit Attachment G.

IV.I. SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

IV.I.1. The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in Permit Attachment E are followed. (HWMR-6, Pt. V, § 264.198(a))

IV.I.2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981). (HWMR-6, Pt. V, § 264.198(b))

MODULE IV – TANKS

IV.A. MODULE HIGHLIGHTS

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

There is an additional 12,000 gallon, double-walled tank which contains new solvent awaiting distribution; the other contains spent solvent awaiting return to a Safety-Kleen Recycle Center. The tank containing the spent solvent is the only tank regulated by this permit. The spent solvent is a hazardous waste because of the characteristic of ignitability and the possible characteristic of toxicity as measured by the Toxicity Characteristic Leaching Procedure.

Ancillary equipment to the waste solvent tank includes a return and fill station containing two enclosed metal cabinets which serve as sumps into which the contents of a drum of used solvent can be emptied. A maximum volume of 40 gallons is retained in the sump of each metal cabinet. A float switch controls a pump that moves excess solvent to the spent solvent tank. The metal cabinet located at the south side of the return and fill station has a jet, which cleans the sediment from the drum. The south metal cabinet is connected to an additional 200 gallon metal tank containing used parts washing solvent still retaining the capacity for less rigorous cleaning applications. This tank serves as the primary source of solvent for drum washing at the south metal cabinet. When the 200 gallon tank is empty, solvent residing in the bottom of the cabinet sump is recirculated through the drum washer for any remaining drum cleaning requirements. The metal cabinet located at the north side of the return and fill station also has a jet, which cleans the sediment from a drum. The north cabinet-drum washer recirculates solvent residing in the bottom of the cabinet when cleaning a drum. All spent solvents and sediments from each metal cabinet are then pumped into the spent solvent tank. The return and fill station has a roof and is equipped with concrete secondary containment and a blind sump with a capacity of 1,548 gallons. Piping from the return and fill station is tight piped and is protected by secondary containment. The pump, which provides clean solvent for filling drums is located within the secondary containment for the return and fill station and all its associated piping is located within this secondary containment. Fill pipes for

emptying the spent solvent and filling the clean solvent tank (from tanker trucks) are secondarily contained.

Based on an engineer's assessment of the system, the two 12,000 gallon tanks were fabricated and installed in 1992.

IV.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

IV.B.1. The permittee may store a maximum total volume of 12,000 gallons of spent solvent and associated bottom sludge {hazardous wastes on the basis of ignitability (D001) and possible TCLP toxicity (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043)} in one tank, as described and depicted in Permit Attachment E, subject to the terms of this Permit.

IV.B.2. The Permittee is prohibited from storing or treating hazardous waste that is not identified in Permit Condition IV.B.1.

IV.C. SECONDARY CONTAINMENT

IV.C.1. The Permittee shall design, construct, and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in Permit Attachment E. (HWMR-6, Pt. V, § 264.193(b)-(f))

IV.D. OPERATING REQUIREMENTS

IV.D.1. The Permittee shall not place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. (HWMR-6, Pt. V, § 264.194(a))

IV.D.2. The Permittee shall prevent spills and overflows from the tank or containment systems using the methods described in Permit Attachment E. (HWMR-6, Pt. V, § 264.194(b))

IV.E. RESPONSE TO LEAKS OR SPILLS

In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions: (HWMR-6, Pt. V, § 264.196(a)-(f))

IV.E.1. Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.

IV.E.2. Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify the Director and demonstrate that the longer time period is required.

If the collected material is a RCRA hazardous waste, it must be managed in accordance with all applicable requirements of HWMR-6, Pts. III, IV, and V. The Permittee shall note that if the collected material is discharged through a point source to U.S. waters or to a Publicly Owned Wastewater Treatment Facility, it is subject to requirements of the Clean Water Act. If the collected material is released to the environment, it may be subject to reporting under 40 CFR Part 302.

IV.E.3. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.

- IV.E.4. Close the system in accordance with the Closure Plan, Permit Attachment G, unless the following actions are taken:
- IV.E.4.a. For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.
 - IV.E.4.b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.
 - IV.E.4.c. For a release to the environment caused by a leak from the aboveground portion of the tank system that does not have secondary containment, and can be visually inspected, the Permittee shall repair the tank system before returning it to service.
 - IV.E.4.d. If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in HWMR-6, Pt. V, § 264.192 and § 264.193.
- IV.E.5. For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

IV.F. INSPECTION SCHEDULES AND PROCEDURES

- IV.F.1. The Permittee shall inspect the tank systems, in accordance with the Inspection Schedule, Permit Attachment C, and shall complete the items in Permit Conditions IV.F.2. and IV.F.3. as part of those inspections:
- IV.F.2. The Permittee shall inspect the overfill controls, in accordance with the schedule in Permit Attachment C. (HWMR-6, Pt. § 264.195(a))
- IV.F.3. The Permittee shall inspect the following components of the tank system once each operating day: (HWMR-6, Pt. V, § 264.195(b))
- IV.F.3.a. Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
 - IV.F.3.b. Data gathered from monitoring and leak detection equipment (e.g., level gauges) to ensure that the tank system is being operated

according to its design;

IV.F.3.c. Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

IV.F.4. The Permittee shall document compliance with Permit Conditions IV.F.2. through IV.F.4. and place this documentation in the operating record for the facility. (HWMR-6, Pt. V, § 264.195(d))

IV.G. RECORDKEEPING AND REPORTING

IV.G.1. The Permittee shall report to the Secretary, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. (HWMR-6, Pt. V, § 264.196(d)(1)) (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) (HWMR-6, Pt. V, § 264.196(d)(2)) (Releases that are contained within a secondary containment system need not be reported). If the Permittee has reported the release pursuant to 40 CFR Part 302, this report satisfies the requirements of this Permit Condition. (HWMR-6, Pt. V, § 264.196(d)(1))

IV.G.2. Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Secretary: (HWMR-6, Pt. V, § 264.196(d)(3))

- a. Likely route of migration of the release;
- b. Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);
- c. Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Secretary with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;
- d. Proximity of downgradient drinking water, surface water, and populated areas; and
- e. Description of response actions taken or planned.

IV.G.3. The Permittee shall submit to the Secretary all certifications of major repairs to correct leaks within seven days from returning the tank system to use. (HWMR-6, Pt. V, § 264.196(f))

IV.G.4. The Permittee shall keep on file at the facility the written assessment of the tank system's integrity. (HWMR-6, Pt. V, 40 CFR § 264.191(a))

IV.H. CLOSURE AND POST-CLOSURE CARE

IV.H.1. At closure of the tank system(s), the Permittee shall follow the procedures in the Closure Plan, Permit Attachment G. (HWMR-6, Pt. V, § 264.197(a))

IV.H.2. If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the Closure Plan, then the Permittee shall obtain a Post-Closure Care, Permit Attachment G.

IV.I. SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

IV.I.1. The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in Permit Attachment E are followed. (HWMR-6, Pt. V, § 264.198(a))

IV.I.2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981). (HWMR-6, Pt. V, § 264.198(b))



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

January 6, 1992

CERTIFIED MAIL: RETURN RECEIPT REQUESTED



Scott E. Fore, Vice President
Environment, Health & Safety
Safety-Kleen Corporation
Elgin, Illinois 60123

RE: Transmittal of Hazardous Waste Permit for
Safety-Kleen, Albuquerque (NMD000804294)

Dear Mr. Fore:

Enclosed is a copy of your permit to operate a hazardous waste facility, under the Hazardous and Solid Waste Amendments of 1984 (HSWA). Also enclosed is EPA's response to the changes in the draft permit.

The New Mexico Environment Division (NMED) and the Environmental Protection Agency (EPA) have entered into a joint permitting agreement, whereby permits may be issued in New Mexico in accordance with the New Mexico Hazardous Waste Management Act, as well as RCRA. The agreement will remain effective until the State hazardous waste program receives authorization under RCRA to administer HSWA. In order for an applicant to have a fully effective permit, both NMED and EPA must issue the permit.

This letter transmits a copy of your HSWA permit with the necessary signature for EPA approval for permit issuance. The RCRA part of the full permit will be sent to you by NMED. The permit will become effective on the date indicated.

If you have any questions, please contact Mr. Bill Gallagher of my staff at (214) 655-6775.

Sincerely yours,

Allyn M. Davis
Director
Hazardous Waste Management Division

Enclosures

cc: Ms. Judith Espinosa, Secretary
New Mexico Environment Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

January 6, 1992

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Benito Garcia
Hazardous and Radioactive Waste Bureau
P.O. Box 26110
Santa Fe, New Mexico 87502

RE: Transmittal of Hazardous Waste Permit for
Safety Kleen, Albuquerque NMD000804294

Dear Mr. Hamilton:

I have enclosed the Hazardous and Solid Waste Amendments (HSWA) permit for Safety-Kleen, Albuquerque in New Mexico. If you have any questions, please contact Mr. Bill Gallagher of my staff at (214) 655-6775.

Sincerely yours,

A handwritten signature in cursive script that reads "Allyn M. Davis".

Allyn M. Davis
Director
Hazardous Waste Management Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 6

HAZARDOUS WASTE PERMIT
(HAZARDOUS AND SOLID WASTE AMENDMENTS, 1984)

PERMITTEE: SAFETY-KLEEN CORPORATION

OWNER: SAFETY-KLEEN CORPORATION

LOCATION: 2720 GIRARD NE

ALBUQUERQUE, NEW MEXICO 87107

I.D. NUMBER: NMD000804294

EFFECTIVE DATE: January 11, 1992

EXPIRATION DATE: JANUARY 14, 2001

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), as amended (42 U.S.C. 6901, et seq.) and the Hazardous and Solid Waste Amendments of 1984 (HSWA), a permit is issued to Safety-Kleen Corporation (hereafter called the Permittee) to operate a hazardous waste disposal facility at the location stated above.

The Permittee must comply with all the terms and conditions of this permit. This permit consists of the conditions contained herein (including the attachments). Said conditions are needed to ensure that the Permittee's hazardous waste management activities comply with all applicable Federal statutory and regulatory requirements. Applicable requirements are those which are found in, referenced in, or incorporated into that version of RCRA or the regulations promulgated pursuant to RCRA that are in effect on the date this permit is issued. (See 40 CFR 270.32 (c).)

This permit is issued in part pursuant to the provisions of Section 201, 202, 203, 206, 207, 212, 215, and 224 of HSWA which modified Sections 3004 and 3005 of RCRA. These require corrective action for all releases of hazardous waste or hazardous constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit, regardless of the time at which the waste was placed in such unit and provides the authority to review and modify the permit at any time. The decision to issue this permit is based on the assumption that all information contained in the permit application is accurate and that the facility will be operated as specified in the permit application. Any inaccuracies found in the application may be grounds for termination or modification of this permit (see 40 CFR 270.41, 270.42 and 270.43) and potential enforcement action.

Under Federal Law, this permit is effective on the effective date specified above unless a petition to the Administrator of the U.S. Environmental Protection Agency is filed in accordance with the requirements of 40 CFR 124.19.

Issued this 6th day of January, 1992

by Allyn M. Davis
Allyn M. Davis, Director
Hazardous Waste Management Division

NOTICE OF PERMIT DECISION

SAFETY-KLEEN CORPORATION, ALBUQUERQUE, NEW MEXICO

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the RCRA statute (42 USC 6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified in Title 40 of the Code of Federal Regulations), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA) a permit is issued to the Safety-Kleen Corporation to operate a hazardous waste facility located in Albuquerque, New Mexico.

This Permit, in conjunction with the Hazardous Waste Permit issued by the State of New Mexico, constitutes the full RCRA permit for this facility. Any person who commented on this permit during the comment period may petition the Administrator to review any condition of this permit, within 30 days of issuance, pursuant to 40 CFR 124.19.

The Federal Law that has required permits for hazardous waste facilities is RCRA. The State of New Mexico has been authorized by EPA to carry out regulatory activities which were required by RCRA prior to November of 1984.

In November of 1984, Congress passed extensive changes to RCRA, known as the Hazardous and Solid Waste Amendments (HSWA), which resulted in additional permit requirements. The State has not yet been authorized to act in lieu of EPA for this portion of the program, and EPA has retained the authority for this portion of the permit.

This permit has been finalized under a joint effort between the State and EPA. The New Mexico Environment Division (NMED) developed the majority of the permit; however, EPA developed Module V, which contains provisions to satisfy the HSWA. EPA will enforce this portion of the permit until the State is authorized to run this portion of the program.

This Module of the joint permit deals primarily with the investigation of Solid Waste Management Units (SWMU's). This HSWA Module of the permit requires the Permittee to determine whether there have been any releases of hazardous waste or hazardous constituents from any SWMU regardless of the time at which waste was placed in such unit and to take appropriate corrective action for any such releases. Other provisions in this Module deal with waste minimization, notification requirements for new SWMU's and release information from SWMU's, land ban requirements, and emission standards for process vents and equipment leaks.

NOTICE OF PERMIT DECISION

SAFETY-KLEEN CORPORATION, ALBUQUERQUE, NEW MEXICO

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This Permit, in conjunction with the Hazardous Waste Permit issued by the State of New Mexico, constitutes the full RCRA permit for this facility. Any person who commented on this permit during the comment period may petition the Administrator to review any condition of this permit, within 30 days of issuance, pursuant to 40 CFR 124.19.

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RESPONSE TO COMMENTS
ON EPA DRAFTED HSWA
PERMIT - MODULE IV
OF RCRA PERMIT FOR
SAFETY-KLEEN CORPORATION, ALBUQUERQUE
EPA I.D. NO. NMD000804294
DECEMBER 11, 1991

I. BACKGROUND INFORMATION

1. Facility location: Safety-Kleen Corporation's Albuquerque Service Center located in Albuquerque, New Mexico about one mile northwest of Carlisle Blvd., and S. R. 40 intersection.
2. Facility Activities and Waste Handling: Safety-Kleen offers three (3) services which involve the accumulation and storage of spent solvent. The listed hazardous wastes which are stored at the facility include Parts Cleaner Solvent, Dry Cleaner Solvent and Paint Wastes. These wastes are shipped from the service center to one of seven (7) Safety-Kleen recycle centers or to an independent reclaimer and are then returned to the customers as usable product. Safety-Kleen stores waste in containers at the one existing storage container building; at a new building to be constructed; and at a double walled underground storage tank to be installed.
3. Public Notice: The public notice of the proposed permit satisfied the public notice requirements specified in 40 CFR 124.17. The public notice was published in the Albuquerque Journal January 7, 1991, and was broadcasted on KKOB, Albuquerque. The announcement was also sent to the facility, appropriate State agencies, and interested parties. The public comment period closed on February 21, 1991.

II. CHANGES MADE IN FINALIZING THE EPA PERMIT

There were only minor words or typographical changes to the HSWA permit.

III. RESPONSE TO COMMENTS

EPA received no comments from the facility or the public concerning the HSWA permit.

**V. SPECIAL CONDITIONS PURSUANT TO THE
1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) TO RCRA
FOR SAFETY KLEEN CORPORATION - ALBUQUERQUE - NMD000804294**

A. DEFINITIONS

For purposes of Section V, the following definitions shall apply:

"Facility" means all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"Solid Waste Management Unit" (SWMU) means any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

"Hazardous waste" means a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. The term hazardous waste includes hazardous constituent as defined below.

"Hazardous constituent" means any constituent identified in Appendix VIII of 40 CFR Part 261, or any constituent identified in Appendix IX of 40 CFR Part 264.

"Administrative Authority" means the Director of the New Mexico Environmental Improvement Division or, in case of HSWA provisions (Module V) for which the State is not authorized, the U.S. Environmental Protection Agency shall be the Administrative Authority.

If, subsequent to the issuance of this permit, these terms are redefined in promulgated regulations, the Administrative Authority may, at its discretion, apply the new definition to this permit.

B. SPECIFIC CONDITIONS**1. Waste Minimization**

The Permittee shall submit a certified report to the Administrative Authority (according to 40 CFR 270.11) in writing annually by December 1, for the previous year ending September 30, that:

a. the Permittee has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the Permittee's facility's operation to the degree determined to be economically practicable; and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment. This certified report must address the items below:

- i) Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;
- ii) Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;
- iii) Any source reduction and/or recycling measures implemented in the last five years or planned for the near future;
- iv) An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;
- v) Factors that have prevented implementation of source reduction and/or recycling;
- vi) Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);
- vii) An investigation of additional waste minimization efforts which could be implemented at the facility. This investigation shall analyze the potential for reducing the quantity and toxicity of

each waste stream through production reformulation, recycling, and all other appropriate means. The analysis shall include an assessment of the technical feasibility, cost and potential waste reduction for each option;

- viii) The Permittee shall submit a flow chart or matrix detailing all hazardous wastes it produces, by quantity and type and by building/area;

The Permittee shall include this certified report in the operating record.

2. Dust Suppression

Pursuant to 40 CFR 266.23(b), the Permittee shall not use waste or used oil or any other material, which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

3. Permit Review

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in 40 CFR 270.41.

4. Compliance with Permit

Compliance with this Permit during its term constitutes compliance, for the purposes of enforcement, with 40 CFR Parts 264 and 266 only for those management practices specifically authorized by this permit. The Permittee is also required to comply with Parts 260, 261, 262, and 263 to the extent the requirements of those Parts are applicable.

5. Specific Waste Ban

- a. The Permittee shall not place in any land disposal unit the wastes specified in RCRA Section 3004 after the effective date of the prohibition unless the Administrator has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this permit.

- b. The Permittee may store wastes restricted under 40 CFR 268 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of 40 CFR 268.50 (a)(2) including, but not limited to, clearly marking each tank or container.
- c. The Permittee is required to comply with the all the requirements of 40 CFR 268.7 as amended. Changes to the waste analysis plan will be considered permit modifications at the request of the Permittee, pursuant to 40 CFR 270.42.
- d. The Permittee shall perform a waste analysis at least annually or when a process changes, to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record.
- e. Compliance with a RCRA permit during its term constitutes compliance, for the purpose of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which become effective by statute, or which are promulgated under Part 268 of this chapter restricting the placement of hazardous wastes in or on the land.

C. LAND DISPOSAL CONDITIONS

1. Additional Waste Ban Requirements

The Permittee shall not land dispose any hazardous waste prohibited by 40 CFR 268 unless:

- a. the waste meets treatment standards specified in 40 CFR 268.40, .41, .42, or .43;
- b. a variance from the treatment standards has been granted pursuant to 40 CFR 268.44;
- c. a petition has been granted on a case-by-case extension to the effective date pursuant to 40 CFR 268.5; or
- d. a "no-migration" petition has been granted pursuant to 40 CFR 268.6.

2. Operation of Land Disposal

The Permittee shall not place hazardous waste in any surface impoundment or landfill unless such unit has a permit meeting the Minimum Technological Requirements

outlined in Section 3004(o) of the Resource Conservation and Recovery Act. The Administrative Authority must approve the plans and specifications for retrofitting prior to commencement of construction.

D. CORRECTIVE ACTION FOR CONTINUING RELEASES

1. Section 3004(u) of RCRA, as amended by HSWA, and 40 CFR 264.101 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste including hazardous constituents from any solid waste management unit (SWMU) at the facility, regardless of when the waste was placed in the unit.

Section 3004 (v) of RCRA as amended by HSWA and Federal regulations promulgated as 40 CFR 264.101, require corrective action beyond the facility boundary, where necessary to protect human health and the environment, unless the owner or operator was unable to obtain the necessary permission to undertake such actions. The permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

2. Failure to submit the information required in Section V or falsification of any submitted information, is grounds for termination of this Permit (40 CFR 270.43). The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required in Section V are signed and certified in accordance with 40 CFR 270.11. Two (2) copies and one (1) compatible disk copy each of these plans, reports, notifications or other submissions shall be submitted by Certified Mail or hand delivered to both:

U.S. EPA, Region 6
Hazardous Waste Division
1445 Ross Avenue
Dallas, Texas 75202-2733

New Mexico Environment
Department
1190 St. Francis Drive
Harold Runnels Building
Santa Fe, New Mexico 87503

3. All plans and schedules required by these conditions are, upon approval of the Administrative Authority, incorporated into this permit by reference and become an enforceable part of this permit. Any noncompliance with such approved plans and schedules shall be shall be

termed noncompliance with this Permit. Extensions of the due dates for submittals may be granted by the Administrative Authority in accordance with the permit modification process under 40 CFR 270.42.

The required information shall include each item specified under RFI Tasks I-V and CMS Tasks VI-IX. Since these required items are essential elements of this permit, failure to submit any of these elements or submission of inadequate or insufficient information may subject the Permittee to enforcement action under Section 3008 of RCRA which may include fines, suspension, or revocation of the permit.

If the Administrative Authority determines that further actions beyond those provided in Section V or changes to that which is stated here in, are warranted, the Administrative Authority may modify Section V either according to procedures in Condition V.P. of this Permit or according to the permit modification processes under 40 CFR 270.41.

4. All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to Section V shall be maintained at the facility during the term of this Permit, including any reissued Permits.
5. For purposes of this Module V, should the Permittee take exception to all or part of a disapproval, or conditional approval of any plan or report required by this module, the Permittee may invoke dispute resolution as outlined below:
 - a. The parties shall in good faith attempt to resolve expeditiously and informally all disputes or differences of opinion. If the parties are unable to informally resolve the dispute within ten business days of the receipt of the disapproval decision or directive which is the subject of dispute, the permittee shall provide the written notice of the invocation of dispute resolution. The permittee shall provide the written notice no later than the twentieth calendar day after receipt of the disapproval decision or directive. The notice shall set forth the specific points of the dispute, the position the permittee is maintaining should be adopted as consistent with the permit's requirements, the basis therefore, and any matters which it considers necessary for the Administrative Authority's proper determination. Within ten

business days of receipt of the written notice, the Administrative Authority will provide to the permittee a written statement of its decision on the pending dispute, which will be incorporated into the final permit unless the permittee requests an opportunity for a conference in accordance with paragraph 2 of this section. The existence of a dispute as defined herein, and the consideration of such matters which are placed into dispute shall not excuse, toll or suspend any compliance obligation or deadline not in dispute during the pendency of the dispute resolution process.

- b. If the permittee objects to any Administrative Authority determination regarding the disputed issue(s), the permittee shall within ten days of its receipt of the Administrative Authority's decision, pursuant to paragraph 1 of this section, notify the Administrative Authority in writing of its objections and may request the Director to convene an informal conference for the purpose of discussing the permittee's objections and the reasons for the Administrative Authority's determination. After this conference, the Director will state in writing his decision regarding the factual issues in dispute. Such decision shall be the final resolution of the dispute and shall be implemented immediately by the permittee.

E. REPORTING REQUIREMENTS

1. The Permittee shall submit to the Administrative Authority signed quarterly progress reports of all activities (i.e., SWMU Assessment, Interim Measures, RCRA Facility Investigation, Corrective Measures Study) conducted pursuant to the provisions of Section V beginning no later than ninety (90) calendar days from the effective date of this permit. These reports shall contain:
 - a. a description of the work completed;
 - b. summaries of all findings, including summaries of laboratory data;
 - c. summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems; and
 - d. projected work for the next reporting period.

2. Copies of other reports (e.g., inspection reports), drilling logs and laboratory data shall be made available to the Administrative Authority upon request.
3. As specified under Permit Conditions F.G., or K., the Administrative Authority may require the Permittee to conduct new or more extensive assessments, investigations, or studies, as needed, based on information provided in these progress reports or other supporting information.
4. The Permittee, in addition to the written reports, shall provide, at the request of the Administrative Authority, status review through semi-annual briefings with the Administrative Authority.

F. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S) (SWMUS)

1. The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMU(s) (i.e., a unit not specifically identified during the RCRA Facility Assessment (RFA)), discovered during the course of ground water monitoring, field investigations, environmental audits, or other means, no later than fifteen (15) calendar days after discovery. The notification shall include the following items, to the extent available:
 - a. The location of the newly-identified SWMU in relation to other SWMUs;
 - b. The type and function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);
 - d. The period during which the unit was operated;
 - e. The specifics on all wastes that have been or are being managed at the SWMU, to the extent available; and
 - f. The results of any sampling and analysis required for the purpose of determining whether releases of hazardous wastes, including hazardous constituents, have occurred, are occurring, or are likely to occur from this unit.

2. Based on the results of this Notification, the Administrative Authority will determine the need for further investigations or corrective measures at any newly-identified SWMU(s) covered in the Notification. If the Administrative Authority determines that such

investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such investigations. This plan will be reviewed for approval as part of the RFI Work Plan under Condition V.J. of this section.

G. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT SWMU(s)

The Permittee shall notify the Administrative Authority, in writing, of any release(s) of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other activities undertaken after the commencement of the RFI, no later than fifteen (15) calendar days after discovery. Such newly-discovered releases may be from newly-identified units, from units for which, based on the findings of the RFA, the Administrative Authority has previously determined that no further investigation was necessary, or from units investigated as part of the RCRA Facility Investigation (RFI). The Administrative Authority may require further investigation and/or Interim Measures for the newly-identified release(s).

H. DESCRIPTION OF CURRENT CONDITIONS REPORT AND RCRA FACILITY INVESTIGATION (RFI) WORK PLAN

1. On or before one hundred twenty (120) days of the effective date of this Permit, the Permittee shall submit to the Administrative Authority a Description of Current Conditions Report describing the current conditions at the facility as outlined in the RFI Scope of Work, Condition R, Task I. This Report may be limited to information not in the Part B or to recent information not addressed in the RCRA Facility Assessment (RFA). Results of any previous investigations and any other investigations required by state or local authorities may be included in this Report if they address any of the requirements of this Permit. The Report shall address the background information pertinent to the facility and the nature and extent of contamination.

TABLE 1

No SWMUs are scheduled for investigation as of 6/9/95, the date that a No further Action decision was made by EPA, Region 6, Dallas, TX, on the Underground Storage Tank, SWMU #4.

2. On or before one hundred twenty (120) days of the effective date of this Permit, the Permittee shall submit a RFI Work Plan to the Administrative Authority for approval as outlined in the RFI Scope of Work, Task II thru Task V. The RFI Work Plan must address those units, releases of hazardous waste containing hazardous constituents, and media of concern which, based on the results of the RFA or other information require further investigation. The scope of the RFI shall include, but not be limited to, the units listed in Table 1 and releases to all media.
 - a. The RFI Work Plan shall describe the objectives of the investigation and the overall technical and analytical approach to completing all actions necessary to characterize the nature, direction, rate, movement, and concentration of releases of hazardous waste or hazardous constituents from specific units or groups of units, and their actual or potential receptors. The RFI Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the RFI. The Scope of Work for a RCRA Facility Investigation (RFI) is in Condition V.R.
 - b. In addition, the RFI Work Plan shall discuss sampling and data collection, quality assurance and data management procedures, including formats for documenting and tracking data and other results of investigations, and health and safety procedures.

3. After the Permittee submits the RFI Work Plan, the Administrative Authority will either approve, disapprove, or modify the RFI Work Plan in writing. If the Administrative Authority approves the plan, the Permittee shall immediately initiate implementation of the plan according to the schedule contained therein. All approved work plans become incorporated into this permit.

In the event of disapproval (in whole or in part) of the plan, the Administrative Authority will specify any deficiencies in writing. The Permittee shall modify the plan to correct these within 30 days of receipt of the disapproval by the Administrative Authority. The modified plan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall invoke the dispute resolution clause under permit conditions D.5.a. and b. If disagreements cannot be resolved, the Administrative Authority may make further modifications as required. If the Administrative Authority modifies the plan, this modified plan becomes the approved RFI Work Plan. The Permittee shall immediately initiate implementation of the approved RFI Work Plan according to the schedule contained therein.

4. The Administrative Authority will review for approval, as part of the RFI Work Plan, any plans developed pursuant to Section V.F addressing further investigations of newly-identified SWMUs, or Section V.G addressing new releases from previously - identified units. The Administrative Authority may modify this Permit either according to procedures in this Permit, or according to the permit modification procedures under 40 CFR 270.41, to incorporate these units and releases into the RFI Work Plan.

I. RCRA FACILITY INVESTIGATION WORK PLAN IMPLEMENTATION

Upon receipt of written approval from the Administrative Authority for the RFI Work Plan, the Permittee shall begin implementation of the RCRA Facility Investigation according to the Schedules specified in the RFI Work Plan. The RFI shall be conducted in accordance with the approved RFI Work Plan. The Permittee shall prepare the RFI Work Plan and undertake the facility investigation in accordance with the following:

1. Development of the RFI Work Plan and reporting of data shall be consistent with the RCRA Facility Investigation Guidance Document (OSWER Directive 9502.00-6 (D)) May 1989 or the equivalent thereof;
2. EPA and NMED reserve the right to split samples. The Permittee shall notify EPA and NMEID at least 10 days prior to any sampling activity;
3. When developing ground water related investigations, the Permittee shall be consistent with the RCRA Groundwater Monitoring Technical Enforcement Guidance Document (EPA OSWER Directive 9950-1, September 1986) or the equivalent thereof to determine methods and materials that are acceptable to EPA;
4. Any deviations from the approved RFI Work Plan which are necessary during implementation of the investigations must be approved by the Administrative Authority and fully documented and described in the progress reports and in the RFI report.

J. RCRA FACILITY INVESTIGATION REPORT AND SUMMARY

1. As specified in the approved RFI Workplan, the Permittee shall submit an RFI Report and a Summary Report. The RFI Report shall describe the procedures, methods, and results of all investigations of SWMUs and their releases, including information on the type and extent of contamination at the facility, sources and migration pathways, and actual or potential receptors. The RFI Report shall present all information gathered under the approved RFI Work Plan. The Report must contain adequate information to support further corrective action decisions at the facility. The Summary shall describe more briefly the procedures, methods, and results from the facility investigation described in the Scope of Work for RFI, Task III.
2. After the Permittee submits the RFI Report and a Summary, the Administrative Authority will either approve or disapprove the Reports in writing.

If the Administrative Authority approves the RFI Report and Summary, the Permittee shall mail the approved Summary Report to all individuals on the facility mailing list established pursuant to 40 CFR 124.10(c) (1)(ix), within fifteen (15) calendar days of receipt of approval.

If the Administrative Authority determines the RFI Final Report and Summary do not fully detail the objectives stated under Condition V.R. , the Administrative

Authority may disapprove the RFI Final Report and Summary. If the Administrative Authority disapproves the Report, the Administrative Authority will notify the Permittee in writing of the Report's deficiencies and specify a due date for submittal of a revised Final Report and Summary. Once approved, the Summary shall be mailed to all individuals on the facility mailing list.

K. INTERIM MEASURES

1. If during the course of any activity initiated under Section V of this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU poses a threat to human health and the environment, the Administrative Authority may specify interim measures. The Administrative Authority may determine the specific measure, including potential permit modifications and the schedule for implementing the required measures. The Administrative Authority will notify the Permittee in writing of the requirement to perform such interim measures. The Administrative Authority will modify Section V of the Permit either according to procedures in this Permit, or according to the permit modification procedures under 40 CFR 270.41, to incorporate such interim measures into the Permit.
2. The following factors will be considered by the Administrative Authority in determining the need for interim measures:
 - a. time required to develop and implement a final remedy;
 - b. actual and potential exposure to human and environmental receptors;
 - c. actual and potential contamination of drinking water supplies and sensitive ecosystems;
 - d. the potential for further degradation of the medium absent interim measures;
 - e. presence of hazardous waste in containers that may pose a threat of release;
 - f. presence and concentration of hazardous waste including hazardous constituents in soil that have the potential to migrate to ground water or surface water;

- g. weather conditions that may affect the current levels of contamination;
- h. risks of fire, explosion, or accident; and
- i. other situations that may pose threats to human health and the environment.

L. DETERMINATION OF NO FURTHER ACTION

1. Based on the results of the RFI and other relevant information, the Permittee may submit an application to the Administrative Authority for a Class III permit modification under 40 CFR 270.42(c) to terminate the RFI/CMS process for a specific unit. This permit modification application must contain information demonstrating that there are no releases of hazardous wastes or hazardous constituents from a particular SWMU at the facility that poses a threat to human health and the environment, as well as information required in 40 CFR 270.42.(c), which incorporates by reference 40 CFR 270.13 through 270.21, 270.62, and 260.63.

If, based upon review of the Permittee's request for a permit modification, the results of the RFI, and other information, including comments received during the sixty (60) day public comment period required for Class III permit modifications, the Administrative Authority determines that releases or suspected releases which were investigated either are non-existent or do not pose a threat to human health and the environment, the Administrative Authority will grant the requested modification.

2. A determination of no further action shall not preclude the Administrative Authority from requiring continued or periodic monitoring of air, soil, ground water, or surface water, when site-specific circumstances indicate that release of hazardous wastes including hazardous constituents are likely to occur, if necessary to protect human health and the environment.
3. A determination of no further action shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the facility that is likely to pose a threat to human health or the environment. In such a case, the Administrative Authority may initiate either a modification to Section

V of this Permit according to procedures in this Permit, or a major permit modification according to 40 CFR 270.41, to rescind the determination made in accordance with Permit Condition V.L.

M. CORRECTIVE MEASURES STUDY (CMS) PLAN

1. If the Administrative Authority has reason to believe that a SWMU has released concentrations of hazardous constituents, or if the Administrative Authority determines that contaminants present a threat to human health and the environment given site-specific exposure conditions, the Administrative Authority may require a Corrective Measures Study (CMS) and shall notify the Permittee in writing. The notification may also specify remedial alternatives to be evaluated by the Permittee during the CMS.
2. The Permittee shall submit a draft CMS Plan to the Administrative Authority within ninety (90) calendar days from notification of the requirement to conduct a CMS. The Scope of Work for a Corrective Measure Study (CMS) is in Section V.S.

The CMS Plan shall provide the following information:

- a. a description of the general approach to investigation and potential remedies;
 - b. a definition of the overall objectives of the study;
 - c. the specific plans for evaluating remedies to ensure compliance with remedy standards;
 - d. the schedules for conducting the study;
and
 - e. the proposed format for the presentation of information.
3. After the Permittee submits the draft CMS Plan, the Administrative Authority will either approve or disapprove the Plan. If the Plan is not approved, the Administrative Authority will notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of the revised Plan. If this Plan is not approved, the Administrative Authority may revise the Plan and notify the Permittee of the revisions. This Administrative Authority revised Plan becomes the approved Plan.

4. After the Permittee submits the CMS Plan, the Administrative Authority will either approve, disapprove, or modify the CMS Plan in writing.

If the Administrative Authority approves the CMS Plan, the Permittee shall immediately initiate implementation of the CMS Plan according to the schedule contained therein. The approved CMS Plans become incorporated into this permit.

In the event of disapproval (in whole or in part) of the plan, the Administrative Authority will specify any deficiencies in writing. The Permittee shall modify the plan to correct these within 30 days of receipt of the disapproval by the Administrative Authority. The modified CMS Plan shall be submitted in writing to the Administrative Authority for review. Should the permittee take exception to all or part of the disapproval, the Permittee shall submit to the Administrative Authority a written statement of the grounds for the exception within 15 days of receipt of the disapproval by the Administrative Authority. If disagreements cannot be resolved, the Administrative Authority may make further modifications as required. If the Administrative Authority modifies the CMS Plan, this modified CMS Plan becomes the approved CMS Plan. The Permittee shall immediately initiate implementation of the approved CMS Plan according to the schedule contained therein.

N. CORRECTIVE MEASURES STUDY (CMS) IMPLEMENTATION

No later than fifteen (15) calendar days after the Permittee has received written approval from the Administrative Authority for the CMS Plan, the Permittee shall begin to implement the Corrective Measures Study according to the schedules specified in the CMS Plan. The CMS shall be conducted in accordance with the approved Plan.

O. CORRECTIVE MEASURES STUDY (CMS) FINAL REPORT

1. Within sixty (60) calendar days after the completion of the CMS, the Permittee shall submit a CMS Final Report. The CMS Final Report shall summarize the results of the investigations for each remedy studied and of any bench-scale or pilot tests conducted. The CMS Report must include an evaluation of each remedial alternative. The CMS Report shall present all information gathered under the approved CMS Plan. The final report must contain adequate information to support the Administrative Authority in the remedy selection decision-making process.

2. If the Administrative Authority determines that the CMS Final Report does not fully satisfy the information requirements specified under Permit Condition V.S, the Administrative Authority may disapprove the CMS Final Report. If the Administrative Authority disapproves the Final Report, the Administrative Authority will notify the Permittee in writing of deficiencies in the Report and specify a due date for submittal of a revised Final Report.
3. After the Permittee submits the Final CMS Report, the Administrative Authority will either approve or disapprove the Report. If the Report is not approved, the Administrative Authority will notify the Permittee in writing of the Report's deficiencies and specify a due date for submittal of the revised Report. If this Report is not approved, the Administrative Authority may revise the Report and notify the Permittee of the revisions. The CMS Report revised by the Administrative Authority becomes the approved Report.
4. Based on preliminary results and the final CMS report, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

P. MODIFICATION OF THE HSWA PERMIT

1. If at any time the Administrative Authority determines that modification of Section V of this Permit is necessary, a modification may be initiated according to the procedures of 40CFR 270.41 and 42.
2. Modifications to the Section V of this Permit do not constitute a reissuance of the Permit.

Q. RFI/CMS SUBMISSION SUMMARY

Below is a summary of the planned reporting requirements pursuant to Section of this Permit:

<u>Actions</u>	<u>Due Date (examples)</u>
Notification of newly-discovered SWMUs	fifteen (15) calendar days after discovery
Notification of newly-discovered releases	fifteen (15) calendar days after discovery
Progress reports on all activities	quarterly -- no later than ninety (90) calendar days after effective date of permit
Description of Current Conditions Report	one-hundred twenty (120) days from effective date of permit
RFI Workplan for SWMU(s) identified at time of permit issuance	one hundred twenty (120) calendar days after the effective date of the permit
RFI Report and Summary	As required in the approved RFI Workplan by the Administrative Authority
Interim Measures Plan for interim measures required after permit issuance	thirty (30) calendar days after notification
CMS Plan	ninety (90) calendar days after notification of requirement to perform CMS
CMS Report	sixty (60) calendar days after completion of CMS
Revised CMS Report	thirty (30) calendar days after notification of deficiency
Demonstration of Financial Assurance at Facility	one hundred and twenty (120) calendar days after permit modification.

**R. SCOPE OF WORK OF FOR A RCRA FACILITY INVESTIGATION (RFI)
AT
SAFETY KLEEN CORPORATION - ALBUQUERQUE - NMD000804294**

PURPOSE

The purpose of this RCRA Facility Investigation is to determine the nature and extent of releases of hazardous waste or hazardous constituents from solid waste management units. The Permittee shall furnish all personnel, materials and services necessary for or incidental to, performing the RFI.

If the Permittee believes that certain requirements of the Scope of work are not applicable, the specific requirements shall be identified and the rationale for inapplicability shall be provided. Information concerning any of the Solid Waste Management Units generated in response to any other Federal, State, or local programs may be used to address any of the requirements of Section V of this Permit. The Administrative Authority will determine the acceptability of this information with regard to addressing the requirements of Section V.R and Section V.S.

SCOPE

The RCRA Facility Investigation consists of five tasks:

Task I: Description of Current Conditions

- A. Facility Background
- B. Nature and Extent of Contamination
- C. Special Permit Conditions
- D. Current and Past Interim Measures

Task II: RFI Workplan

- A. Data Collection Quality Assurance Plan
- B. Data Management Plan
- C. Health and Safety Plan
- D. Community Relations Plan

Task III: Facility Investigation

- A. Environmental Setting
- B. Source Characterization
- C. Contamination Characterization
- D. Potential Receptor Identification

Task IV: Investigative Analysis

- A. Data Analysis
- B. Protection Standards

TASK I: PRELIMINARY REPORT: DESCRIPTION OF CURRENT CONDITIONS

The Permittee shall submit to the Administrative Authority a Description of Current Conditions providing the background information pertinent to the facility, contamination and any type of on-going corrective action as set forth below. This report is limited to information not in the Part B permit application or to recent information not addressed in the RCRA Facility Assessment (RFA).

A. Facility Background

The report shall summarize the regional location, pertinent boundary features, general facility physiography, hydrogeology, and historical use of the facility for the treatment, storage or disposal of solid and hazardous waste. Information from existing reports and studies is acceptable for any requirement in this permit, as long as the source of this information is documented and it is pertinent and reflective of current conditions, and meets the format for the RFI investigations. The report shall include:

1. Map(s) depicting the following:
 - a. General geographic location;
 - b. Property lines, with the owners of all adjacent property clearly indicated;
 - c. Topography, waterways, all wetlands, floodplains, water features, drainage patterns;
 - d. All solid waste management units;
 - e. All known past solid or hazardous waste treatment, storage and disposal areas regardless of whether they were active on November 19, 1980;
 - f. Surrounding land uses (residential, commercial, agricultural, recreational); and
 - g. The location of all production and ground water monitoring wells. These wells shall be clearly labeled and ground and top of casing elevations included (these elevations may be included as an attachment).

All maps shall be of sufficient detail and accuracy to locate and report all current and future work performed at the site.

2. A history and description of ownership and operation, solid and hazardous waste generation, treatment, storage and disposal activities at the facility.
3. Approximate dates or periods of past waste spills, notification of the materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, State, or Federal response units or private parties), including any inspection reports or technical reports generated as a result of the response.
4. Documentation of all interim measures which were or are being undertaken at the facility other than those specified in this permit.
5. A reference of all environmental, geologic, and hydrogeologic studies performed by all parties, at or near the facility, with a short summary of purpose scope and significant findings thereof.
6. A reference of all environmental permits, applied for and/or received, the purpose thereof, and a short summary of requirements.

B. Nature and Extent of Contamination

The Permittee shall include in the Preliminary Report the existing information on the nature and extent of contamination.

1. The Permittee's report shall summarize all possible source areas of contamination, including all solid waste management units. For each area, the Permittee shall identify the following:
 - a. location of unit/area (which shall be depicted on a facility map);
 - b. quantities of solid and hazardous wastes;
 - c. hazardous waste and hazardous constituents, to the extent know; and
 - d. identification of areas where additional information is necessary.
2. The Permittee shall prepare an assessment and description of the existing degree and extent of contamination. This should include:

- a. available monitoring data and qualitative information on locations and levels of contamination at the facility;
- b. all potential migration pathways including information on geology, pedology, hydrogeology, physiography, hydrology, water quality, meteorology, and air quality; and
- c. the potential impact(s) on human health and the environment, including demography, ground water and surface water use, and land use.

C. Current and Past Interim Measures

The permittee shall document and report on all interim measures which were or being undertaken at the facility other than those specified in the permit. This shall include:

1. objectives of the interim measures (how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long term solution at the facility);
2. design, construction, operation, and maintenance requirements;
3. schedules for design, construction and monitoring; and
4. schedule for progress reports.

TASK II: RFI WORKPLAN REQUIREMENTS

The Permittee shall prepare an RFI Work Plan. The RFI Work Plan shall include the development of several plans, which shall be prepared concurrently. During the RFI, it may be necessary to revise the RFI Work Plan to increase or decrease the detail of information collected to accommodate the facility specific situation. The RFI Work Plan shall include the following:

A. Collection Quality Assurance Plan

1. The strategy section of the Data Collection Quality Assurance Plan shall include but not be limited to the following:
 - a. description of the intended uses for the data, and the necessary level of precision and accuracy for these intended uses;
 - b. description of methods and procedures to be used to assess the precision, accuracy and completeness of the measurement data;
2. Sampling and Field Measurements

The Sampling Field Measurements Section of the Data Collection Quality Assurance Plan shall at least discuss:

- a. selecting appropriate sampling and field measurements locations, depths, etc;
- b. providing a statistically sufficient number of sampling and field measurements sites;
- c. determining conditions under which sampling or field measurements should be conducted;
- d. determining which parameters are to be measured and where;
- e. selecting the frequency of sampling and length of sampling period;
- f. selecting the types of sample (e.g., composites vs. grabs) and number of samples to be collected;
- g. measures to be taken to prevent contamination of sampling or field measurements equipment and cross contamination between sampling points;

- h. documenting field sampling operations and procedures;
 - i. selecting appropriate sample containers;
 - j. sample preservation; and
 - k. chain-of-custody.
3. The Sample Analysis shall include;
- a. chain-of custody
 - b. sample storage procedures and holding times
 - c. sample preparation methods;
 - d. analytical procedures;
 - f. calibration procedures and frequency;
 - g. data reduction, validation and reporting; and
 - h. internal quality control checks, laboratory performance and systems audits and frequency.

B. Data Management Plan

The Permittee shall develop and initiate a Data Management Plan to document and track investigation data and results. This plan shall identify and set up data documentation materials and procedures, project file requirements, and project-related progress reporting procedures and documents. The plan shall also provide the format to be used to present the raw data and conclusions of the investigation, such as:

- 1. Data Record;
- 2. Tabular Displays; and
- 3. Graphical Displays

C. Health and Safety Plan

The Permittee shall prepare a facility Health and Safety Plan.

1. Major elements of the Health and Safety Plan shall include:
 - a. facility description including availability of resources such as roads, water supply electricity and telephone service.
 - b. a description of the known hazards and evaluation of the risks associated with the incident and with each activity conducted;
 - c. list key personnel and alternatives responsible for site safety, responses operations, and for protection of public health;
 - d. delineate work area;
 - e. describe levels of protection to be worn by personnel in work areas;
 - f. establish procedures to control site access;
 - g. describe decontamination procedures for personnel and equipment;
 - h. establish site emergency procedures;
 - i. address emergency medical care for injuries and toxicological problems;
 - j. describe requirements for an environmental field monitoring program;
 - k. specify any routine and special training required for responders; and
 - l. establish procedures for protecting workers from weather-related problems.
2. The Facility Health and Safety Plan shall be consistent with:
 - a. NIOSH Occupation Safety and Health Guidance Manual for Hazardous Waste Site Activities 1985);
 - b. EPA Order 1440.1 - Respiratory Protection;

- c. EPA Order 1440.3 - Health and Safety Requirements for Employees engaged in Field Activities;
- d. approved Facility Contingency Plan;
- e. EPA Operating Safety Guide (1984);
- f. OSHA regulations particularly in 29 CFR 1910 and 1926;
- g. State and local regulations; and
- h. other EPA guidance as provided.

D. Community Relations Plan

The Permittee shall prepare for the dissemination of information to the public regarding investigation activities and results.

E. Project Management Plan

The Permittee shall prepare a Project Management Plan which will include a discussion of the technical approach, schedules, budget, and key project personnel. The project management plan will also include a description of qualifications of key project personnel performing or directing the RFI, including contractor personnel. This plan shall also document the overall management approach to the RFI.

TASK III: FACILITY INVESTIGATION

The Permittee shall conduct those investigation of SWMUs previously identified with known or suspected releases of contamination as necessary to protect human health and the environment to: characterize the facility (Environmental Setting); define the source (Source Characterization); define the degree and extent of contamination (Contamination Characterization); and identify actual or potential receptors.

Investigations should result in data of adequate technical quality to support the development and evaluation of the corrective measure alternative or alternatives during the Corrective Measures Study, when necessary.

The facility investigation activities shall when conducted follow the plans set forth in Task II. All sampling and analyses shall be conducted in accordance with the Data Collection Quality Assurance Plan. All sampling locations shall be documented in a log and identified on a detailed site map.

A. Environmental Setting

The Permittee shall collect information to supplement and verify existing information on the environmental setting at the facility. The Permittee shall characterize the following:

1. Hydrogeology

The Permittee shall conduct a program to evaluate hydrogeologic conditions at the facility. This program shall provide the following information:

- a. A description of the regional and SWMU specific geologic and hydrogeologic characteristics affecting ground water flow beneath the facility.
- b. An analysis of any topographic features that might influence the ground water flow system. (Note: Stereographic analysis of aerial photographs may aid in this analysis).
- c. Based on field data, tests, (e.g., gamma and neutron logging of existing and new wells, piezometers and borings) and cores, a representative and accurate classification and description of the hydrogeologic units which may be part of the migration pathways at the facility (i.e., the aquifers and any intervening saturated and unsaturated units).

- d. Based on field studies and cores, structural geology and hydrogeologic cross sections showing the extend (depth, thickness, lateral extent) of hydrogeologic units which may be part of the migration pathways identifying:
 - i) unconsolidated sand and gravel deposits;
 - ii) zones of fracturing or channeling in consolidated or unconsolidated deposits; and
 - iii) zones of high permeability that might direct and restrict the flow of contaminants.
- e. Based on data obtained from ground water monitoring wells and piezometers installed upgradient and downgradient of the potential contaminant source, a representative description of water level or fluid pressure monitoring.
- f. A description of man-made influences that may affect the hydrogeology of the site.

2. Soils

The Permittee shall conduct a program to characterize the soil and rock units above the water table in the vicinity of the contaminant release(s). Such characterization shall include, but not be limited to, the following information:

- a. Surface soil distribution;
- b. Soil profile, including ASTM classification of soils;
- c. Transects of soils stratigraphy;
- d. Saturated hydraulic conductivity;
- e. Porosity;
- f. Cation exchange capacity (CEC);
- g. Soil pH;
- h. Particle size distribution;
- i. Depth of water table;
- j. Moisture;

- k. Effect of stratification on unsaturated flow;
- l. Infiltration
- m. Evapotranspiration;
- n. Residual concentration of contaminants in soil; and
- o. Mineral and metal content.

B. Source Characterization

The Permittee shall collect analytical data to completely characterize the wastes and the areas where wastes have been placed, including: type; quantity; physical form; disposition (containment or nature of deposits); and the facility characteristics affecting release (e.g., facility security, and engineered barriers). This shall include quantification of the following specific characteristics, at each source area:

- 1. Unit/Disposal Area Characteristics:
 - a. Location of unit/disposal area;
 - b. Type of unit/disposal area;
 - c. Design features;
 - d. Operating practices (past and present);
 - e. Period of operation;
 - f. Age of unit/disposal area;
 - g. General physical conditions;
 - h. Method used to close the unit/disposal area; and
- 2. Waste Characteristics:
 - a. Type of waste placed in unit;
 - b. Physical and chemical characteristics; and
 - c. Migration and dispersal characteristics of the waste.

The Permittee shall document the procedures used in making the above determinations.

C. Contamination Characteristics

The Permittee shall collect analytical data on ground water, soils, surface water, sediment, and subsurface gas contamination when necessary to characterize contamination from a SWMU. This data shall be sufficient to define the extent, origin, direction, and rate of movement of contaminant plumes. Data shall include time and location of sampling, media sampled, concentrations found, conditions during sampling, and the identity of the individual(s) performing the sampling and analysis. Each media must be investigated, if the Permittee believes certain media could not be affected by a release from a specific unit, a detailed justification for not investigating the media must be provided. The Permittee shall address the following types of contamination at the facility:

1. Ground Water Contamination

The Permittee shall conduct a Ground Water Investigation to characterize any plumes of contamination at the facility. This investigation shall, at a minimum, provide the following information:

- a. A description of the horizontal and vertical extent of any immiscible or dissolved plume(s) originating from the facility;
- b. The horizontal and vertical direction of contamination movement;
- c. The velocity of contaminant movement;
- d. The horizontal and vertical concentration profiles of any Appendix IX constituents in the plume (s);
- e. An evaluation of factors influencing the plume movement; and
- f. An extrapolation of future contaminant movement.

The Permittee shall document the procedures used in making the above determinations (e.g., well design, well construction, geophysics, modeling, etc.).

2. Soil Contamination

The Permittee shall conduct an investigation to characterize the contamination of the soil and rock units above the water table in the vicinity of the contaminant release. The investigation shall include the following information:

- a. A description of the vertical and horizontal extent of contamination;
- b. A description of contaminant and soil chemical properties within the contaminant source area and plume migration and transformation;
- c. Specific contaminant concentrations;
- d. The velocity and direction of contaminant movement; and
- e. An extrapolation of future contaminant movement.

The Permittee shall document the procedures used in making the above determinations.

3. Surface Water Contamination

The Permittee shall conduct a surface water investigation to characterize contamination in surface water bodies resulting from contaminant releases at the facility. The investigation shall include the following:

- a. A description of the horizontal and vertical extent of any immiscible or dissolved plumes originating from the facility, and the extent of contamination in the underlying sediments;
- b. The horizontal and vertical direction and velocity of contaminant movement;
- c. An evaluation of the physical, biological and chemical, factors influencing contaminant movement;
- d. An extrapolation of future contaminant movement; and
- e. A description of the chemistry of the contaminated surface waters and sediments. This includes determining the pH, total dissolved solids, specific contaminant concentrations, etc.

The Permittee shall document the procedures used in making the above determinations.

4. Air Contamination

The Permittee shall conduct an investigation to characterize the particulate and gaseous contaminants released into the atmosphere.

This investigation shall provide the following information:

- a. A description of the horizontal and vertical direction and velocity of contaminant movement;
- b. The rate and amount of the release; and
- c. The chemical and physical composition of the contaminants releases, including horizontal and vertical concentration profiles.

5. Subsurface Gas

The Permittee shall provide information characterizing the nature, rate and extent of releases of reactive gases from the units. Such information shall include, but not be limited to: provisions for monitoring subsurface gases released from the unit; and an assessment of the potential for these releases to have a threat to human health and environment.

The Permittee shall document the procedures used in making the above determination.

D. Potential Receptors

The Permittee shall collect data describing the human populations and environmental systems that are susceptible to contaminant exposure from the facility. Chemical analysis of biological samples may be needed. Data on observable effects in ecosystems may also be obtained.

TASK IV: INVESTIGATIVE ANALYSIS

The Permittee shall prepare an analysis and summary of all facility investigations and their results. The objective of this task shall be to ensure that the investigation data are sufficient in quality (e.g., quality assurance procedures have been followed) and quantity to describe the nature and extent of contamination, potential threat to human health and/or the environment, and to support the Corrective Measures Study, if one is required.

The Permittee shall analyze all facility investigation data outlined in Task III and prepare a report on the type and extent of contamination at the facility including sources and migration pathways. The report shall describe the extent of contamination (qualitative/quantitative) in relation to the background levels indicative for the area. The Permittee shall identify all relevant and applicable standards for the protection of human health and the environment (e.g. National Ambient Air Quality

Standards, federally-approved State water quality standards, ground water protection standards, etc).

TASK V: REPORTS

A. Preliminary and Workplan

The Permittee shall submit to the Administrative Authority the Preliminary Report (Task I) and the RCRA Facility Investigation Workplan (Task II) as described in the Permit.

B. Progress

Within 90 days of the effective date of this permit, the Permittee shall provide the Administrative Authority with signed, quarterly progress reports containing:

1. A description and estimate of the percentage of the RFI completed;
2. Summary of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;
3. Summary of problems or potential problems encountered during the reporting period;
4. Actions being taken to rectify problems;
5. Changes in key project personnel during the reporting period;
6. Projected work for the next reporting period;
7. Summaries of all findings to date; and
8. Summaries of all changes made in the RFI during the reporting period.

C. Draft and Final

The RFI Report shall be developed in draft form for the Administrative Authority's review. The RFI Report shall be developed in final format incorporating comments received on the Draft RFI Report.

Two hard copies and one compatible disk copy of all reports, including the Task I report (OTET), Task II workplan (OTET) and both the Draft and Final RFI Reports (Task III-IV) (OTET) shall be provided by the Permittee to the Administrative Authority.

Facility Submission Summary

A summary of the information reporting requirements contained in the RCRA Facility Investigation Scope of Work is presented below:

<u>Facility Submission</u>	<u>Due Date</u>
Description of Current Conditions (Task I)	120 days*
RFI Workplan (Task II)	120 days
Draft RFI Report	As specified by the Administrative Authority
Final (Revised) RFI Report (Tasks III and IV)	As specified by the Administrative Authority
Progress reports on Tasks I through V and interim measures	Quarterly

* Dates are calculated from the effective date of this permit unless otherwise specified.

**S. SCOPE OF WORK FOR A CORRECTIVE MEASURE STUDY (CMS)
AT
SAFETY KLEEN CORPORATION - ALBUQUERQUE - NMD000804294**

PURPOSE

The purpose of this Corrective Measure Study (CMS) is to develop and evaluate the corrective action alternative or alternatives and to recommend the corrective measure or measures to be taken at Safety Kleen - Albuquerque, New Mexico.

The Permittee will furnish the personnel, materials, and services necessary to prepare the CMS, except as otherwise specified.

If the Permittee believes that certain requirements of the scope of work are not applicable, the specific requirements shall be identified and a detailed rationale for inapplicability shall be provided.

SCOPE

The Corrective Measure Study consists of four tasks:

Task VI: Identification and Development of the Corrective Measure Alternative or Alternatives

- A. Description of Current Situation
- B. Establishment of Corrective Action Objectives
- C. Laboratory and Bench-Scale Study
- D. Screening of Corrective Measures Technologies
- E. Identification of the Corrective Measure Alternative or Alternatives

Task VII: Evaluation of the Corrective Measure Alternative(s)

- A. Technical/Environmental/Human Health/Institutional
- B. Cost Estimate

Task VIII: Justification and Recommendation of the Corrective Measure(s)

- A. Technical
- B. Human Health
- C. Environmental

TASK VI: IDENTIFICATION AND DEVELOPMENT OF THE CORRECTIVE ACTION ALTERNATIVE OR ALTERNATIVES

Based on the results of the RCRA Facility Investigation (RFI) and consideration of the identified Preliminary Corrective Measure Technologies (Task I) the Permittee shall identify, screen, and develop the alternative(s) for removal, containment, treatment and/or other remediation of the contamination based on the objectives established for the corrective action.

A. Description of Current Conditions

The Permittee shall submit an update to the information describing the current situation at the facility and the known nature and extent of the contamination as documented by the RFI report. The Permittee shall provide an update to information presented in Task I of the RFI to the Administrative Authority regarding previous response activities and any interim measures which have or are being implemented at the facility. The Permittee shall also make a facility-specific statement of the purpose for the response, based on the results of the RFI. The statement of purpose should identify the actual or potential exposure pathways that should be addressed by corrective measures.

B. Establishment of Corrective Action Objectives

The Permittee, in conjunction with the Administrative Authority, shall establish site specific objectives for the corrective action. These objectives shall be based on public health and environmental criteria, information gathered during the RCRA Facility Investigation, EPA guidance and the requirements of any applicable Federal statutes. At a minimum, all corrective actions concerning ground water releases from solid waste management units must be consistent with, and as stringent as, those required under 40 CFR 264.100.

C. Laboratory and Bench-Scale Study

When a new technology is being proposed or similar waste streams have not routinely been treated or disposed using the technology the Permittee shall conduct laboratory and/or bench-scale studies to determine the applicability of a corrective measure technology or technologies to the facility conditions. The Permittee shall analyze the technologies, based on literature review, vendor contracts, and past experience to determine the testing requirements.

The Permittee shall develop a testing plan identifying the type(s) and goal(s) of the study(ies), the level of effort needed, and the procedures to be used for data management and interpretation.

Upon completion of testing, the Permittee shall evaluate the testing results to assess the technology or technologies with respect to the site-specific questions identified in the test plan.

The Permittee shall prepare a report summarizing the testing program and its results, both positive and negative.

D. Screening of Corrective Measure Technologies

The Permittee shall review the results of the RFI and reassess the technologies specified in Task II and identify any additional technologies which are applicable to the facility. The Permittee shall screen the preliminary corrective measure technologies identified in Task II of the RFI and any supplemental technologies to eliminate those that may prove infeasible to implement, that rely on technologies unlikely to perform satisfactorily or reliably, or that do not achieve the corrective measure objective within a reasonable time period. This screening process focuses on eliminating those technologies which have severe limitations for a given set of waste and site-specific conditions. The screening step may also eliminate technologies based on inherent technology limitations.

Site, waste, and technology characteristics which are used to screen inapplicable technologies are described in more detail below:

1. Site Characteristics

Site data should be reviewed to identify conditions that may limit or promote the use of certain technologies. Technologies whose use is clearly precluded by site characteristics should be eliminated from further consideration;

2. Waste Characteristics

Identification of waste characteristics that limit the effectiveness or feasibility of technologies is an important part of the screening process. Technologies clearly limited by these waste characteristics should be eliminated from consideration. Waste characteristics particularly affect the feasibility of in-situ methods, direct treatment methods, and land disposal (on/off-site); and

3. Technology Limitations

The level of technology development, performance record, and inherent construction, operation and maintenance problems shall be identified for each technology considered. Technologies that are unreliable, perform poorly, or are not fully demonstrated may be eliminated in the screening process. For example, certain treatment methods have been developed to a point where they can be implemented in the field without extensive technology transfer or development.

E. Identification of the Corrective Measure Alternatives

The Permittee shall develop the corrective measure alternatives based on the corrective measure objectives and analysis of Preliminary Corrective Measure Technologies, as presented in Task I of the RFI as supplemented following the preparation of the RFI report. The Permittee shall rely on engineering practice to determine which of the previously identified technologies appear most suitable for the site. Technologies can be combined to form the overall corrective action alternatives. The alternatives developed should represent a workable number of options that each appear to adequately address all site problems and corrective action objectives. Each alternative may consist of an individual technology or a combination of technologies. The Permittee shall document the reasons for excluding technologies, identified in Task I, as supplemented in the development of the alternative.

TASK VII: EVALUATION OF THE CORRECTIVE MEASURE ALTERNATIVE OR ALTERNATIVES

The Permittee shall describe each corrective measure alternative that passed the Initial Screening in Task VI and evaluate each corrective measure alternative and its components. The evaluation shall be based on technical, environmental, human health and institutional concerns. The Permittee shall also develop cost estimates for each corrective measure.

A. Technical/Environmental/Human Health/Institutional

The Permittee shall provide a description of each corrective measure alternative which includes but is not limited to the following preliminary process flow sheets; preliminary sizing and type of construction for buildings and structures; and rough quantities of utilities required. The Permittee shall evaluate each alternative in the four following areas:

1. Technical

The Permittee shall evaluate each corrective measure alternative based on performance, reliability, implementability and safety.

a. The Permittee shall evaluate performance based on the effectiveness and useful life of the corrective measure.

i) Effectiveness shall be evaluated in terms of the ability to perform intended functions such as containment, diversion, removal, destruction, or treatment. The effectiveness of each corrective measure shall be determined either through design specifications or by performance evaluation. Any specific waste or site characteristics which could potentially impede effectiveness shall be considered. The evaluation should also consider the effectiveness of combinations of technologies.

ii) Useful life is defined as the length of time the level of effectiveness can be maintained. Most corrective measure technologies, with the exception of destruction, deteriorate with time. Often, deterioration can be slowed through proper system operation and maintenance, but the technology eventually may require replacement. Each corrective measure shall be evaluated in terms of the projected

service lives of its component technologies. Resource availability in the future life of the technology, as well as appropriateness of the technologies, must be considered in estimating the useful life of the project.

b. The Permittee shall provide information on the reliability of each corrective measure including their operation and maintenance requirements and their demonstrated reliability:

i) Operation and maintenance requirements include the frequency and complexity of necessary operation and maintenance. Technologies requiring frequent or complex operation and maintenance activities should be regarded as less reliable than technologies requiring little or straightforward operation and maintenance. The availability of labor and materials to meet these requirements shall also be considered; and

ii) Demonstrated and expected reliability is a way of measuring the risk and effect of failure. The Permittee should evaluate whether the technologies have been used effectively under analogous conditions; whether the combination of technologies have been used together effectively; whether failure of any one technology has an immediate impact on receptors; and whether the corrective measure has the flexibility to deal with uncontrollable changes at the site.

c. The Permittee shall describe the implementability of each corrective measure including the relative ease of installation (constructibility) and the total time required to achieve a given level of response:

i) Constructibility is determined by conditions both internal and external to the facility conditions and includes such items as location of underground utilities, depth to water table, heterogeneity of subsurface materials, and location of the facility (i.e., remote location vs. a congested urban area). The Permittee shall evaluate what measures can be taken to facilitate construction under these conditions. External factors which affect implementation

include the need for special permits or agreements, equipment availability, and the location of suitable off-site treatment or disposal facilities;

ii) Two components of time shall be addressed: the time it takes to implement a corrective measure and the time it takes to actually see beneficial results. Beneficial results are defined as the reduction of contamination to some acceptable, pre-established level.

d. The Permittee shall evaluate each corrective measure alternative with regard to safety. This evaluation shall include threats to the safety of nearby communities and environments as well as those to workers during implementation. Factors to consider include fire, explosion, and exposure to hazardous substances.

2. Environmental

The Permittee shall perform an Environmental Assessment for each alternative. The Environmental Assessment shall focus on facility conditions and pathways of contamination actually addressed by each alternative. The Environmental Assessment for each alternative will include, at a minimum, an evaluation of: the short- and long-term beneficial and adverse effects of the response alternative; any adverse effects on environmentally sensitive areas; and an analysis of measures to mitigate adverse impacts.

3. Human Health

The Permittee shall assess each alternative in terms of the extent which it mitigates short- and long-term potential exposure to any residual contamination and protects human health both during and after implementation of the corrective measure. The assessment will describe the levels and characterizations of contaminants on-site, potential exposure routes, and potentially affected populations. Each alternative will be evaluated to determine the level of exposure to contaminants and the reduction over time. For management of mitigation measures, the relative reduction of impact will be determined by comparing residual levels of each alternative with existing criteria, standards, or regulations acceptable to the Administrative Authority.

4. Institutional

The Permittee shall assess relevant institutional needs for each alternative. Specifically, the effects of Federal, State, and local environmental and public health standards, regulations, guidance, advisories, ordinances, or community relations on the design, operation, and timing of each alternative.

B. Cost Estimate

The Permittee shall develop an estimate of the cost of each corrective measure alternative (and for each phase or segment of the alternative). The cost estimate shall include capital, and operation and maintenance costs.

1. Capital costs consist of direct (construction) and indirect (nonconstruction and overhead) costs.

a. Direct capital costs include:

- i) Construction costs: Cost of materials, labor (including fringe benefits and worker's compensation), and equipment required to install the corrective measure alternative.
- ii) Equipment costs: Costs of treatment, containment, disposal and/or service equipment necessary to implement the action; these materials remain until the corrective action is completed;
- iii) Land and site development costs: Expenses associated with purchase of land and development of existing property; and
- iv) Building and services costs: Costs of process and nonprocess buildings, utility connections, purchased services, and disposal costs.

b. Indirect capital costs include:

- i) Engineering expenses: Costs of administration, design construction supervision, drafting, and testing of corrective measure alternatives;
- ii) Legal fees and license or permit costs: Administrative and technical costs necessary to obtain licenses and permits for installation and operation;

- iii) Start-up and shakedown costs: Costs incurred during corrective measure start-up; and
- iv) Contingency allowances: Funds to cover costs resulting from unforeseen circumstances, such as adverse weather conditions, strikes, and inadequate facility characterization.

2. Operation and maintenance costs are post-construction costs necessary to ensure continued effectiveness of a corrective measure. The Permittee shall consider the following operation and maintenance cost components:

- a. Operating labor costs: Wages, salaries, training, overhead, and fringe benefits associated with the labor needed for postconstruction operation;
- b. Maintenance materials and labor costs: Costs for labor, parts, and other resources required for routine maintenance of facilities and equipment;
- c. Auxiliary materials and energy: Costs of such items as chemicals and electricity for treatment plant operations, water and sewer service, and fuel;
- d. Purchased services: Sampling costs, laboratory fees, and professional fees for which the need can be predicted;
- e. Disposal and treatment: Costs of transporting, treating, and disposing of waste materials, such as treatment plant residues generated during operation;
- f. Administrative costs: Costs associated with administration of corrective measure operation and maintenance not included under other categories;
- g. Insurance, taxes, and licensing costs: costs of such items as liability and sudden accidental insurance; real estate taxes on purchased land or rights-of-way; licensing fees for certain technologies; and permit renewal and reporting costs;
- h. Maintenance reserve and contingency funds: annual payments into escrow funds to cover (1) costs of anticipated replacement or rebuilding of equipment and (2) any large unanticipated operation and maintenance costs; and

- i. Other costs: items that do not fit any of the above categories.

TASK VIII. JUSTIFICATION AND RECOMMENDATION OF THE CORRECTIVE MEASURE OR MEASURES

The Permittee shall justify and recommend a corrective measure alternative using technical, human health, and environmental criteria. This recommendation shall include summary tables which allow the alternative or alternatives to be understood easily. Tradeoffs among health risks, environmental effects, and other pertinent factors shall be highlighted, and the corrective measure alternative or alternatives to be implemented based on the results of Tasks VI and VII must be approved by the Administrative Authority before implementation. At a minimum, the following criteria will be used to justify the final corrective measure or measures:

A. Technical

1. Performance - corrective measure or measures which are most effective at performing their intended functions and maintaining the performance over extended periods of time will be given preference;
2. Reliability - corrective measure or measures which do not require frequent or complex operation and maintenance activities and have proven effective under waste and facility conditions similar to those anticipated will be given preference;
3. Implementability - corrective measure or measures which can be constructed and operated to reduce levels of contamination to attain or exceed applicable standards in the shortest period of time will be preferred; and
4. Safety - corrective measure or measures which pose the least threat to the safety of nearby residents and environments as well as workers during implementation will be preferred.

B. Human Health

The corrective measure or measures must comply with existing U.S. EPA criteria, standards, or regulations for the protection of human health. Corrective measures which provide the minimum level of exposure to contaminants and the maximum reduction in exposure with time are preferred.

C. Environmental

The corrective measure or measures posing the least adverse impact (or greatest improvement) on the environment over the shortest period of time will be favored.

TASK IX: REPORTS

The Permittee shall prepare a Corrective Measure Study Report presenting the results of Tasks V through IX recommending a corrective measure alternative. Two (2) hard copies and a compatible disk copy of the draft and final reports shall be provided to the Administrative Authority by the Permittee.

A. Progress

The Permittee shall, at a minimum, provide the Administrative Authority with signed quarterly progress reports containing:

1. A description and estimate of the percentage of the CMS completed;
2. Summary of contacts relevant to corrective action with representatives of the local community, public interest groups or State government during the reporting period;
3. Summary of problems or potential problems relevant to corrective action encountered during the reporting period;
4. Actions being taken to rectify problems;
5. Changes in key project personnel during the reporting period;
6. Projected work for the next reporting period; and
7. Summaries of changes made in the CMS during the reporting period.

B. Draft

The Report shall, at a minimum, include:

1. A summary of the corrective measure or measures and rationale
 - a. Description of the corrective measure or measures and rationale for selection;
 - b. Performance expectations;

- c. Preliminary design criteria and rationale;
 - d. General operation and maintenance requirements;
 - e. Long-term monitoring requirements
2. Design and Implementation Precautions:
- a. Special technical problems;
 - b. Additional engineering data required;
 - c. Permits and regulatory requirements;
 - d. Access, easements, right-of-way;
 - e. Health and safety requirements; and
 - f. Community relations activities.
3. Cost Estimates and Schedules:
- a. Capital cost estimate;
 - b. Operation and maintenance cost estimate; and
 - c. Project schedule (design, construction, operation).

C. Final

The Permittee shall finalize the Corrective Measure Study Report incorporating comments received from the Administrative Authority on the Draft Corrective Measure Study Report.

U. EMISSION STANDARDS FOR PROCESS VENTS AND EQUIPMENT LEAKS

- 1. The Permittee shall comply with the air emissions requirements of 40 CFR 264, Subpart AA (for process vents) and Subpart BB (for equipment leaks).
- 2. The Permittee shall submit to EPA, upon request, all of the information required under 264.1064 and 264.1035, as applicable, within 15 days of the request.

ATTACHMENT A

WASTE ANALYSIS PLAN

WASTE ANALYSIS PLAN

ABSTRACT

Waste Description	EPA Waste Code No.	Facility Capacity ¹ (gallons)	Annual Amount ²
Spent Solvents	D001 ³	12,000	143
Tank/Dumpster Bottom Sediment	D001 ³	N/A	3
Spent Immersion Cleaner	F002, F004 ³	6,990	3
Dry Cleaning Waste	F002 ³	Included with spent immersion cleaner	6
Spent Solvent (aqueous)	Below ³	Included with spent immersion cleaner	3
Paint Waste	D001, F003, F005 ³	9,650	14

¹ The facility capacity is in gallons.

² The annual amount is in thousands of gallons.

³ and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

WASTE ANALYSIS PLAN

ABSTRACT

Waste Description	EPA Waste Code Nos.	Facility Capacity ¹	Annual Amount ²
Spent Mineral Spirits	D001 ⁵	12,000	103
Bottom Sediment From the Tank	D001 ⁵	N/A	2
Spent Immersion Cleaner Old Formula New Formula	F002 ⁵ , F004 ⁵ see ⁵	6,048 ³	2.5
Dry Cleaning Waste	F002 ⁵		12
Paint Waste	D001, F003, F005 ⁵	1,092 ⁴	14.3
Dumpster Sediment	D001 ⁵		2

1 The facility capacity is in gallons.

2 The annual amount is in thousands of gallons.

3 The total amount of drummed waste stored in the east side of the warehouse will not exceed 2,592 gallons and the total amount of drummed waste stored in the west side of the warehouse will not exceed 3,456 gallons (a total of 6,048 gallons).

4 The total amount of ignitable wastes stored in the flammable shelter will not exceed 1,092 gallons.

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

PROPERTY DESCRIPTION: About 1.05 acres with the following structures:

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

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

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

* indicates double-walled tank

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

2.3 RECHARACTERIZATIONS OF WASTE STREAMS

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. In addition, each waste stream is recharacterized on an annual basis. The following tables in Appendix D summarize the waste analysis plan practiced for the recharacterizations of the hazardous wastes returned from the service centers:

- Table D-1 Parameters and Rationale for Hazardous Waste Selection
- Table D-2 Parameters and Test Methods
- Table D-3 Methods Used to Sample Hazardous Wastes
- Table D-4 Frequency of Analysis

FREQUENCY OF ANALYSIS

<u>Used Mineral Spirits</u>	<u>Analyses*</u>	<u>Frequency</u>
Used Mineral Spirits	Flash Point TCLP**	At least annually once every five years
Mineral Spirits Tank Bottom Sludge and Free Water	Flash Point TCLP	At least annually once every five years
Used Immersion Cleaner (old formula)	Methylene Chloride Orthodichlorobenzene Cresylic Acid	At least annually " " " " " "
(new formula)	TCLP	once every five years
Dry Cleaning Wastes (including filter cartridges, filter powders from diatomaceous earth filters, filter powders from other systems and still bottoms)	Perchloroethylene 1,1,2-trichloro- 1,2,2-trifluoroethane Flash Point TCLP	At least annually " " " " " " " " " once every five years
Paint Wastes	Toluene, xylene, methyl ethyl ketone, methyl isobutyl ketone, acetone, isopropanol, methanol, ethanol, normal butyl acetate, iso butyl acetate, cadmium chromium, lead TCLP	At least annually once every five years

* Past analyses have indicated the parameters listed are the only ones of concern

** Toxicity Characteristic Leaching Procedure

WASTE ANALYSIS PLAN

A.1 DESCRIPTION OF WASTES

Six types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. It should be noted that the solvents managed at this facility are only incompatible with strong oxidizers and reactive metals, none of which are present in the containers, container storage area, or the concrete sealant. The solvents are also compatible with one another. Analytical data for the wastes and specifications for the products are in Attachment A.1 qualitative descriptions follow.

A.1.1 Wastes Resulting From the Parts Washer Service

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

- a. Spent solvent--The spent solvent is removed from the tank by a tanker truck on a scheduled basis. About 5,000 gallons are removed every month. This waste is ignitable (D001) and TCLP toxic using the characteristic leaching procedures (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). In 1986, the Albuquerque service center shipped about 85,000 gallons of spent solvent to the Safety-Kleen recycle center in Denton, Texas.
- b.1 Bottom sediment in the tank--Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A Safety-Kleen vacuum truck is used for this purpose and can collect up to 2,000 gallons of this waste for reclamation. The sediment is ignitable (D001) and toxic using the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043)
- b.2 Dumpster Sediment--Management addressed in Attachment E.1 a and contains characteristics for tank bottom sediment are stored in flammable storage building
- c. Spent Aqueous Parts Cleaning Solvent--may be bulked at the service center into containers that meet DOT specifications or may be co-mingled with the other solvent into the spent solvent tank. It may be toxic using the toxic characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043)

- d. Immersion Cleaner--Remains in the drum in which it was originally used until it is received at the recycle center. Drums containing spent solvents are stacked two-high in the drum storage area of the warehouse.

Immersion cleaner remains in the drum in which it was originally used until it is received at the recycle center. Drums containing spent solvents are stacked two-high in the drum storage area of the warehouse. The immersion cleaner may contain chlorinated solvents (F002) and cresylic acid (F004). The 699 formula immersion cleaner is toxic using toxic characteristic leaching procedure. (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). In 1986, about 1,300 gallons of these solvents were shipped to a recycle center for reclamation.

A.1.2 Wastes Resulting From the Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in containers meeting DOT specifications. The containers are then palletized, stacked two-high and placed in the container storage area of the warehouse. Approximately 95% of the dry cleaning solvent used is perchloroethylene (F002 and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043) and the remaining 5% is trichloro-trifluoroethane (F002) and toxic using the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

A.1.3 Wastes Resulting from the Paint Service

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

A.2 QUALITY CONTROL PROCEDURES

The used solvents are the primary feed stocks for the generation of Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects spent solvents from about 1,100 customers, most of whom are small quantity generators, and about 14,000 drums containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

Furthermore, as discussed earlier in the Facility Description, all the materials collected at the service center are managed at all times in the closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

In accordance with HWMR 206.B.3, however, Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste collected does not match that designated. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been done or the material must be rejected. If a container with questionable contents is returned to the service center, a sample will be taken and analysis will be performed at the recycle center according to the procedures outlined in section A.3 of this attachment. Pending the results of the analyses the Resource Recovery Branch Manager will be notified of any contamination that may have occurred. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

Safety-Kleen controls the use and management of its solvents by:

1. limiting the solvents stored to those compatible with one another and their containers.
2. limiting the uses of each type of solvent (for example, dry cleaning waste is only collected from dry cleaner shops);
3. determining the customer's type of business (i.e., his SIC code is recorded) and the purpose for which he will use the machine.
4. training customers to use the machines properly;
5. training employees to inspect spent solvent and determine whether it is acceptable;
6. indicating on the service document, every time waste is collected, whether the spent solvent meets Safety-Kleen's acceptance criteria.
7. marking each container with the customer's name, address and EPA I.D. number (if required). This information remains on containerized waste until it is accepted at the reclamation facility; and
8. keeping a record of each incoming and outgoing shipment in the operating log at each facility.

9. waste shipments to the Safety-Kleen Recycle Facilities from the Albuquerque branch are mixed with compatible waste from other service centers.

Safety-Kleen's customers sign a service document containing the following information:

- a. the name, address and EPA I.D. number of the facility to which the waste is being shipped;
- b. the customer's name, address and EPA I.D. number (if required); and
- c. the description and amount of Safety-Kleen solvent waste generated.

In addition, each incoming and outgoing shipment is recorded in the facility's operating log.

If a waste is rejected at the time of service, the customer will be given a choice as to whether he will dispose of the waste himself or require Safety-Kleen's assistance. If he requests Safety-Kleen's assistance, a sample will be drawn using a Coliwasa tube and it will be analyzed for flash point and volatile organic compounds. If this analysis does not adequately define the constituents, additional analyses will be performed as necessary (e.g., for semi-volatile organic compounds, base-neutral compounds, PCBs, etc.). If the waste is acceptable at the branch, it will be relabeled and manifested appropriately and then managed with the other wastes. If it is not acceptable, it will either be: (a) managed on a 10 day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and shipped directly to a properly permitted reclamation or disposal facility.

The recycle center sends waste analyses to the service centers. If any sample of the waste solvent does not meet standard acceptance criteria, the recycle center will phone the Resource Recovery Branch Manager and alert him to the situation before any processing is done. The Resource Recovery Branch Manager has the right to refuse any further service to a business which has returned waste unable to meet acceptable criteria. If the particular acceptance criteria is not met, a determination will be made as to what processing technology is required. The material is processed accordingly which may include transportation to another facility. Each truckload of spent solvent comes from one identifiable Safety-Kleen facility. The recycle center and the branch facility have accurate up-to-date information on the waste constituents which are available in the event of a release.

A.2.1 Qualitative Waste Analysis

- a. **General Inspection Procedures:**
Safety-Kleen visually inspects each drum of waste when it is collected at the customer's location. Safety-Kleen examines the waste for volume, appearance, consistency and odor and is intimately familiar with the characteristics of the waste it receives. Based on the known waste characteristics, Safety-Kleen has

established the specific acceptance criteria set forth below, to be used by Safety-Kleen personnel in their visual inspections. These acceptance criteria allow Safety-Kleen to ensure that the waste being picked up is not contaminated.

If a particular drum of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) sample the waste for testing at a Safety-Kleen laboratory, as described below, to determine whether the waste has been contaminated; or (2) reject the drum of waste. In the event the waste is not sampled, Safety-Kleen will notify the generator's State Agency that is authorized to implement the RCRA hazardous waste management program (or EPA if the RCRA program has not been delegated to the State).

If the waste is sampled for further analysis, the service representative will take a sample of the waste and then seal the drum and label it as hazardous waste. The drum is left with the customer pending the results of the laboratory tests. The laboratory testing involves analyzing the suspect waste for flash-point and the presence of volatile organic compounds using a modified EPA 8010 method (GC analysis). The costs of any sampling and testing performed as a result of the waste failing to meet the acceptance criteria, will be borne by the customer.

If the laboratory analysis reveals that the sampled waste is not contaminated, Safety-Kleen will accept the waste from the customer. If the laboratory confirms that the waste is contaminated, the generator will be responsible for securing an alternate means of disposal or they may contract with Safety-Kleen to handle the waste as ten-day transfer.

b. Waste Specific Criteria

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

1. Spent Solvent

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

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

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

2. Immersion Cleaner

a. 609 Formula Immersion Cleaner

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

Unused immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. In the case of a print shop, the solvent may be clear, green, brown, black, or many colors. Therefore, if the spent immersion cleaner does not appear to be the expected color, the service representative will either sample the waste for possible contamination as described above, or reject the drum of waste.

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

b. 699 Formula Immersion Cleaner

The 699 formula immersion cleaner has been determined to be a hazardous waste, according to TCLP the acceptance criteria and respective descriptions will be the same as those for the 609 formula immersion cleaner, with the exception of the physical state criterion. The 699 formula immersion cleaner waste is a single phase, therefore, this criterion is not applicable.

3. Dry Cleaner Wastes

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

a. Spent Filter Cartridges

Spent Filter cartridges are placed in containers meeting DOT specifications. It is obvious to the service representative whether the items in the drums are filter cartridges. The drums may also contain approximately one inch of liquid which should either be clear or have a light brownish tint. If the amount of the liquid is greater than approximately one inch or if the liquid is a color other than light brown, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

b. Powder Residue

The criteria for the acceptance of powder residue are consistency and color, the former being the more significant criterion of the two. A drum of powder residue should not contain any liquid. As the name implies, it will be dry or "powdery" to the touch. If there is any liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

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

c. Still Bottoms

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

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

4. Paint Wastes

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

a. Lacquer Thinner Waste

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in pails which meet DOT requirements. The paint gun cleaning machine operates as a closed system whereby there should never be a combined volume of more than the expected amount of solvent in the two collection pails. The solvent is pumped from a tube in a left hand pail (facing the machine) through the machine into the right hand pail. The left hand pail starts with clean solvent which will be pumped out as the machine is used to clean the spray guns. If a service representative discovers more than the expected amount of solvent in the two pails, or there is an overflow from the right hand pail, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

b. Paint Waste

b.1. Liquid

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative will insert a long glass tube into the drum. The tube should glide easily down to the bottom of the drum. The service representative will handle this waste as a class 3 flammable waste. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the 3 foot tube (the water and paint will separate in the tube and thus can be measured) the waste will be rejected.

b.2. Solid

For waste containing more than 30 percent solids the service representative will handle the waste as class 4 flammable waste.

As described above for solvent, a full TCLP analysis except for the pesticides (Chlorodane, Endrin, Heptachlor, Heptachlor Epoxide, Lindane, Methoxychlor and Toxaphene) and herbicides (2,4-D and 2,4,5-TP) will be performed on a representative sample at least once each calendar year.

A.3.3 Immersion Cleaner Solvent

If either of these tests yields unacceptable results, the Resource Recovery Branch Manager will be notified immediately and the load will receive appropriate special handling. If the results are acceptable, the following tests will be performed:

- Flash point
- Physical appearance
- Specific gravity
- Percentage of water
- Volatile Organic Analysis (using EPA methods 8010, 8015, 8020, 8120 or approved equivalents) See Table 1 on Page A-13.

If any of these tests yield unacceptable results or indicate solvent contamination outside the normal range, the Resource Recovery Branch Manager will be notified immediately.

As described above, a full TCLP test except for the pesticides (Chlorodane, Endrin, Heptachlor, Heptachlor Epoxide, Lindane, Methoxychlor and Toxaphene) and herbicides (2,4-D and 2,4,5-TP) will be performed on a representative sample of immersion cleaner at least once each calendar year.

A.3.4 Dry Cleaning Solvent/Still Bottoms

- Physical appearance
- Volatile Organic Analysis for Perchloroethylene (using EPA methods 8010, 8015, 8020, 8120 or approved equivalents)
- Specific Gravity

If any of these tests yield unacceptable results or indicate contamination outside the normal range, the Resource Recovery Branch Manager will be notified immediately.

As described above, a full TCLP analysis except for the pesticides (Chlorodane, Endrin, Heptachlor, Heptachlor Epoxide, Lindane, Methoxychlor and Toxaphene) and herbicides (2,4-D and 2,4,5-TP) will be performed on a representative sample of dry cleaning waste at least once each calendar year.

A.4 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is the responsibility of the Environment, Health and Safety Department.

A.5 LAND BAN NOTIFICATION/CERTIFICATION FORMS

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

1. Printing the Notice language on manifests-such as for core-business customers to branch shipments; or
2. Special forms for each regularly handled waste types (e.g., MS, IC, perc, freon); or
3. A general form that must be completed for unique or non-standard waste streams. These wastes will only be handled on a transfer basis in accordance with 40 CFR 263.12

The notice is required paperwork for all Safety-Kleen waste types. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the notice is kept in the files of the receiving facility with the manifest or with the pre-print if a manifest is not used.

A.6 OPERATING LOG RECORD

Safety-Kleen maintains an operating log record on site which includes the following information as it becomes available:

1. A description and the quantity of each hazardous waste received, and the method and date of its storage as required by Pt. V. sec. 264, Appendix I;
2. The location of each hazardous waste within the facility and quantity;
3. Records and results of waste analyses performed;
4. Summary reports and details of all incidents that require implementing the contingency plan;
5. Records and results of inspections;
6. Monitoring, testing or analytical data and corrective action where required;
7. For off-site facilities, Notices to generators as specified in 264.12(b);
8. All closure and post-closure cost estimates;

9. A certification by the permittee no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste;
10. The land ban notices and requirements. These records are kept on file in the Resource Recovery Branch Manager's office.

ATTACHMENT A - 1

ANALYTICAL DATA OF WASTE STREAMS

ATTACHMENT A - 1

ANALYTICAL DATA OF WASTE STREAMS



1996

*ANNUAL WASTE STREAM
RECHARACTERIZATION*

FINAL REPORT

01/18/96

1995

**ANNUAL WASTE STREAM RECHARACTERIZATION
SAMPLING SITE CODES**

BI, Bismark, ND
BU, Buffalo, NY
CO - E, Englewood, CO
CO - GJ, Grand Junction, CO
CO - P, Pueblo, CO
DE, Denton, TX (Recycle Center)
DO, Dolton, IL (Recycle Center)
RE, Reedley, CA (Recycle Center)
FA, Fargo, ND
GA - C, Columbus, GA
GA - G, Garden City, GA
GA - M, Macon, GA
GA - m, Morrow, GA
GA - N, Norcross, GA
ID - B, Boise, ID
IL-D, Dolton, IL
KS - D, Dodge City, KS
KS - E, Edwardsville, KS
KS - W, Wichita, KS
LA - K, Kenner, LA
LA - P, Pineville, LA
MN-B, Blaine, MN
MS - J, Jackson, MS
NC - R, Raliegh, NC
ND-B, Bismark, ND
NE-GI, Grand Island, NE
NE-O, Omaha, NE

NJ - B, Bound Brook, NJ
NJ - N, Newark, NJ
NJ - S, Southampton, NJ
NM - A, Albuquerque, NM
NM - F, Farmington, NM
NY - A, Avon, NY
NY - C, Colonie, NY
NY - D, Dewitt, NY
NY - L, Lackawana, NY
NY - N, North Amityville, NY
NY - S, Syracuse, NY
NY - T, Thornwood, NY
NY - W, Woodside, NY
OK - T, Tulsa, OK
SC - G, Greer, SC
SD - S, Sioux Falls, SD
TECH CTR, SK Technical Center, Elk Grove, IL
WA - L, Lynnwood, WA
WA - S, Spokane, WA
WV - N, Nitro, WV
WV - W, Wheeling, WV



DRY CLEANER BOTTOMS

Physical Properties and TCLP Metals Analysis, ppm

Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag	
Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5	
LAB	SITE											
SK-95	NY-T	4.17	1.11	>200	<1.25	<2.0	0.28	<u>30.25</u>	<u>32.11</u>	<0.04	<0.90	<3.0
SK-95	NY-L	4.83	1.28	>200	<4.0	3.23	<1.0	<u>23.3</u>	<u>6.78</u>	<0.04	<0.45	<1.5
SK-95	GA-m	4.46	1.14	145	<4.0	2.76	<1.0	<u>18.11</u>	3.85	<0.04	<0.45	<1.5
SK-95	NE-O	6.43	1.34	>200	<0.40	0.172	<0.10	<0.20	<0.35	<0.0008	<0.75	<0.15
SK-95	NE-GI	7.29	1.27	>200	<0.40	<0.10	<0.10	<0.20	<0.35	<0.0008	<0.75	<0.15
SK-95	DE	9.29	1.11	>200	<4.0	0.116	<0.10	<0.20	1.54	<0.0008	<0.75	<0.15
SK-95	MS-J	5.20	0.972	>200	<0.40	0.768	<0.10	1.59	<0.35	<0.0008	<0.75	<0.15
SK-95	GA-N	5.62	1.29	>200	<0.40	0.12	<0.10	<0.20	<0.35	<0.0008	<0.75	<0.15
	MAX	10.9	1.43	145	0	7.82	2.09	34.1	32.11	0.012	0.67	0
	MIN	3.66	0.972	81	0	0.11	0.126	0.126	0.46	0.00084	0.615	0

DRY CLEANER BOTTOMS

TCLP Semi Volatiles Analysis, ppm

Parameter	cresol	2,4-DNT	Cl6-benz	Cl6-13-but	Cl6-eth	nitrobenz	Cl5-phenol	pyridine	2,4,5-TCP	2,4,6-TCP	
Reg. Limit	200	0.13	0.13	0.5	3	2	100	5	400	2	
LAB	SITE										
SK-95	NY-T	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380
SK-95	NY-L	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380
SK-95	GA-m	<190	<140	<280	<380	<320	<120	<1800	<180	<90	<120
SK-95	NE-O	<0.700	<0.580	<0.850	<1.50	<1.50	<0.800	<0.300	<0.900	<0.900	<0.950
SK-95	NE-GI	<0.040	<0.044	<0.044	<0.100	<0.120	<0.068	<0.350	<0.140	<0.040	<0.140
SK-95	DE	0.072	<0.058	<0.085	<0.150	<0.150	<0.080	<0.030	<0.090	<0.090	<0.095
SK-95	MS-J	<2.8	<2.3	<3.4	<5.9	<6.0	<3.2	<1.2	<3.6	<3.6	<3.8
SK-95	GA-N	<0.110	<0.092	<0.140	<0.240	<0.240	<0.130	<0.048	<0.140	<0.140	<0.150
	MAX	0.18	0	0	0	0	0.14	0.18	0	0	0
	MIN	0.072	0	0	0	0	0.14	0.18	0	0	0

DRY CLEANER BOTTOMS

TCLP Volatiles Analysis, ppm

	Parameter	benzene	CCl4	Cibenz	CHCl3	1,4-DCIB	1,2-DCA	1,1-DCE	MEK	PCE	TCE	VChloride
	Reg. Limit	0.5	0.5	100	6	7.5	0.5	0.7	200	0.7	0.5	0.2
LAB	SITE											
SK-95	NY-T	<10000	<10000	<10000	<10000	<10000	<10000	<10000	<50000	<u>273000</u>	<10000	<14000
SK-95	NY-L	<100	<100	<100	<100	<100	<100	<100	<500	<u>500000</u>	<100	<140
SK-95	GA-m	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<5000	<u>366000</u>	<1000	<1400
SK-95	NE-O	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>76</u>	<u>2.4</u>	<0.14
SK-95	NE-GI	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>43.1</u>	<u>1.3</u>	<0.14
SK-95	DE	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	0.12	1.9	<u>40</u>	<u>0.53</u>	<0.14
SK-95	MS-J	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>54700</u>	0.29	<0.14
SK-95	GA-N	<0.10	<0.10	<0.10	2	<0.10	<0.10	<0.10	<0.50	<u>218</u>	0.16	<0.14
	MAX	0	0	0	1250	0	0	0.12	718	935000	1950	0
	MIN	0	0	0	1.1	0	0	0.12	1.9	40	0.011	0

DRY CLEAN FILTER POWDER

TCLP Semi Volatiles Analysis, ppm

Parameter	cresol	2,4-DNT	Cl6-benz	Cl6-13-but	Cl6-eth	nitrobenz	Cl5-phenol	pyridine	2,4,5-TCP	2,4,6-TCP	
Reg. Limit	200	0.13	0.13	0.5	3	2	100	5	400	2	
LAB	SITE										
SK-94	KS-W	0.09	<0.044	<0.044	<0.10	<0.12	<0.068	<0.35	<0.14	<0.040	<0.14
SK-94	KS-E	0.106	<0.044	<0.044	<0.10	<0.12	<0.068	<0.35	<0.14	<0.040	<0.14
SK-94	NY-W	0.15	<0.042	<0.044	<0.089	<0.120	<0.069	<0.349	<0.142	<0.041	<0.142
SK-94	NY-A	<0.052	<0.044	<0.044	<0.10	<0.12	<0.068	<0.35	<0.14	<0.040	<0.14
SK-94	NY-D	<0.052	<0.044	<0.044	<0.10	<0.12	<0.068	<0.35	<0.14	<0.040	<0.14
SK-94	BU	<0.058	<0.036	<0.068	<0.096	<0.078	<0.031	<0.45	<0.045	<0.023	<0.030
SK-95	KS-E	0.035	<0.042	<0.044	<0.098	<0.120	<0.069	<0.350	<0.142	<0.041	<0.142
SK-95	KS-W	0.14	<0.044	<0.044	<0.10	<0.12	<0.068	<0.35	<0.14	<0.040	<0.14
SK-95	NY-A	<0.040	<0.040	<0.040	<0.042	<0.085	<0.044	<0.040	<0.040	<0.040	<0.042
SK-95	NY-T	<0.070	<0.058	<0.085	<0.150	<0.150	<0.080	<0.030	<0.090	<0.090	<0.095
SK-95	DE	<0.040	<0.044	<0.044	<0.100	<0.120	<0.068	<0.350	<0.140	<0.040	<0.140
SK-95	NY-C	0.052	<0.046	<0.068	<0.120	<0.120	<0.064	<0.024	<0.072	<0.072	<0.076
SK-95	NE-GI	<0.040	<0.044	<0.044	<0.100	<0.120	<0.068	<0.350	<0.140	<0.040	<0.140
SK-95	NE-O	<0.070	<0.058	<0.085	<0.150	<0.150	<0.080	<0.030	<0.090	<0.090	<0.095
SK-95	NY-L	<0.070	<0.058	<0.085	<0.150	<0.150	<0.080	<0.030	<0.090	<0.090	<0.095
SK-95	NM-A	<0.040	<0.040	<0.040	<0.042	<0.085	<0.044	<0.040	<0.040	<0.040	<0.042
SK-95	NY-N	<0.040	<0.040	<0.040	<0.042	<0.085	<0.044	<0.040	<0.040	<0.040	<0.042
	MAX	0.15	0	0	0	0	0	0	0	0	0
	MIN	0.035	0	0	0	0	0	0	0	0	0

IMMERSON CLEANER

Physical Properties and TCLP Metals Analysis, ppm

Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag	
Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5	
LAB	SITE											
SK-94	GA-m	10.29	0.95	143	<4.0	<1.0	<u>3.91</u>	<2.0	<u>118.3</u>	<0.04	<0.452	<1.5
SK-94	GA-G	10.45	0.95	142	<4.0	<1.0	<1.0	<2.0	<u>16.45</u>	<0.04	<0.45	<1.5
SK-94	GA-C	9.89	0.98	>144	<4.0	2.07	<u>58.3</u>	2.01	<u>221.4</u>	<0.04	<0.45	<1.5
SK-94	GA-M	9.69	0.93	149	<4.0	<1.0	<u>25.74</u>	<2.0	<u>22.84</u>	<0.04	<0.452	<1.5
SK-94	NY-A	10	0.94	142	<4.0	2.99	<1.0	<2.0	<u>25.65</u>	0.098	<0.45	<1.5
SK-94	NY-C	9.74	0.93	147	<4.0	<1.0	<u>14.71</u>	<2.0	<u>5.4</u>	<0.04	<0.452	<1.5
SK-94	NY-D	9.83	0.94	148	<4.0	<1.0	<u>2.66</u>	<2.0	<u>5.31</u>	<0.04	<0.452	<1.5
SK-94	ID-B	9.85	0.95	147	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-94	BU	9.74	0.93	143	<4.0	2.97	<1.0	<2.0	<u>503</u>	0.056	<0.452	<1.5
SK-94	SD-S	10.3	0.95	147	<4.0	<1.0	<1.0	<2.0	<u>11.17</u>	<0.04	<0.452	<1.5
SK-94	KS-W	9.84	0.94	145	<4.0	1.13	<u>15.67</u>	<2.0	<u>21.5</u>	<0.04	<0.45	<1.5
SK-94	KS-E	10.48	0.94	150	<4.0	<1.0	<u>1.15</u>	<2.0	3.56	<0.04	<0.45	<1.5
SK-94	KS-D	9.72	0.93	146	<4.0	1.08	<u>40.08</u>	<2.0	<u>32.67</u>	<0.04	<0.45	<1.5
SK-94	NY-W	9.96	0.93	143	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-94	GA-N	9.88	0.94	143	<4.0	<1.0	<u>4.11</u>	<2.0	4.7	<0.04	<0.452	<1.5
SK-94	NJ - S	10.48	0.94	149	<4.0	<1.0	<u>4.53</u>	<2.0	<3.5	<0.04	<0.45	<1.5
G-94	WV-W		0.87	>200	<0.50	<20	<u>22</u>	1.7	<u>53</u>	0.39	<0.20	<1.0
G-94	WV-N		0.86	>200	<0.50	<20	0.7	<1.0	<3.0	<0.10	<0.20	<1.0
SK-95	CO-E/AC	10.42	0.933	153	<0.40	<1.0	<u>3.53</u>	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	KS-D	10.10	0.928	>142	<4.0	2.09	<u>11.44</u>	<2.0	<u>41.14</u>	<0.04	<0.45	<1.5
SK-95	KS-E	10.97	0.93	144	<4.0	<1.0	<u>6.87</u>	<2.0	<u>55.4</u>	<0.04	<0.45	<1.5
SK-95	KS-W	10.51	0.947	145	<4.0	<1.0	<u>24.41</u>	<u>13.88</u>	<3.5	<0.04	0.54	<1.5
SK-95	SD-S	10.08	0.931	137	<4.00	<1.00	<1.00	<2.00	<u>8.43</u>	<0.04	<0.45	<1.5
SK-95	GA-C	10.68	0.944	139	<4.0	<1.0	<u>2.35</u>	<2.0	<u>11.78</u>	<0.04	<0.45	<1.5
SK-95	GA-G	9.27	0.935	>200	<4.0	3.26	<u>122.4</u>	<u>7.23</u>	<u>58.2</u>	<0.04	0.65	<1.5
SK-95	NJ-N	10.11	0.935	145	<4.0	<1.0	<u>4.07</u>	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	ID-B	10.70	0.949	>200	<5.0	59.3	<u>2.0</u>	<u>244.63</u>	<u>74.95</u>	<0.04	<0.45	<1.0
SK-95	LA-P	9.41	0.939	138	<5.0	<20	<u>33.81</u>	<2.0	<u>11.78</u>	<0.04	<0.45	<1.0
SK-95	NY-S	10.33	0.948	144	<5.0	<20	<1.0	<2.0	<5.0	<0.04	<0.45	<1.0

IMMER ON CLEANER

TCLP Semi Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	cresol 200	2,4-DNT 0.13	Cl6-benz 0.13	Cl6-13-but 0.5	Cl6-eth 3	nitrobenz 2	Cl5-phenol 100	pyridine 5	2,4,5-TCP 400	2,4,6-TCP 2
SK-94	GA-m	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	GA-G	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	GA-C	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	GA-M	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	NY-A	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	NY-C	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	NY-D	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	ID-B	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	BU	0.113	<0.029	<0.054	<0.077	<0.062	<0.025	<0.36	0.11	<0.018	<0.024	<0.024
SK-94	SD-S	<2630	<2119	<2200	<4913	<5977	<3431	<17470	<7084	<2065	<7111	<7111
SK-94	KS-W	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	KS-E	<2630	<2119	<2200	<4913	<5977	<3431	<17470	<7084	<2065	<7111	<7111
SK-94	KS-D	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	NY-W	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	GA-N	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK - 94	NJ - S	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
G-94	WV-W	<2000	<10000	<10000	<10000	<10000	<10000	<50000		<10000	<10000	<10000
G-94	WV-N	<10000	<5000	<5000	<5000	<5000	<5000	<25000		<5000	<5000	<5000
SK-95	CO-E/AC	<190	<140	<280	<380	<320	<120	<1800	<180	<90	<120	<120
SK-95	KS-D	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	<118
SK-95	KS-E	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	<118
SK-95	KS-W	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	<118
SK-95	SD-S	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	<118
SK-95	GA-C	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	<118
SK-95	GA-G	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	<118
SK-95	NJ-N	<190	<144	<280	<380	<320	<124	<1800	<180	<90	<118	<118
SK-95	ID-B	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380
SK-95	LA-P	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380
SK-95	NY-S	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380

IMMERSON CLEANER

TCLP Volatiles Analysis, ppm

Parameter	benzene	CCI4	Cibenz	CHCl3	1,4-DCIB	1,2-DCA	1,1-DCE	MEK	PCE	TCE	VChloride	
Reg. Limit	0.5	0.5	100	6	7.5	0.5	0.7	200	0.7	0.5	0.2	
LAB	SITE											
SK-94	GA-m	<50	<50	<50	<50	<u>710</u>	<50	<50	<250	<50	<50	<100
SK-94	GA-G	<50	<50	<50	<50	<50	<50	<50	<250	<u>360</u>	<50	<100
SK-94	GA-C	<50	<50	<50	<50	<u>400</u>	<50	<50	<250	<50	<50	<100
SK-94	GA-M	<50	<50	<50	<50	<u>486</u>	<50	<50	<250	<u>128</u>	<50	<100
SK-94	NY-A	<50	<50	74	<50	<u>543</u>	<50	<50	<250	<u>193</u>	<u>110</u>	<100
SK-94	NY-C	<50	<50	<50	<50	<u>690</u>	<50	<50	<u>533</u>	<u>143</u>	<u>67</u>	<100
SK-94	NY-D	<50	<50	83	<50	<u>1130</u>	<50	<50	<250	<u>335</u>	<u>222</u>	<100
SK-94	ID-B	<50	<50	<50	<50	<u>267</u>	<50	<50	<250	<u>116</u>	<50	<100
SK-94	BU	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1540</u>	<0.10	<0.10	<0.14
SK-94	SD-S	<50	<50	70	<50	<u>650</u>	<50	<50	<250	<u>190</u>	<50	<100
SK-94	KS-W	<50	<50	52	<50	<u>680</u>	<50	<50	<250	<u>340</u>	<50	<100
SK-94	KS-E	<50	<50	<u>590</u>	<50	<u>590</u>	<50	<50	<250	<u>200</u>	<50	<100
SK-94	KS-D	<50	<50	50	<50	<u>760</u>	<50	<50	<250	<u>300</u>	<50	<100
SK-94	NY-W	<50	<50	<50	<50	<u>530</u>	<50	<50	<250	<u>320</u>	<50	<100
SK-94	GA-N	<50	<50	<50	<50	<u>940</u>	<50	<50	<250	<u>65</u>	<50	<100
SK - 94	NJ - S	<50	<50	<50	<50	<u>278</u>	<50	<50	<250	<u>247</u>	<u>151</u>	<100
G-94	WV-W	<50	<50	<50	<50	<u>710</u>	<50	<50	<200	<u>110</u>	<50	<100
G-94	WV-N	<50	<50	65	<50	<u>760</u>	<50	<50	<200	<u>220</u>	<50	<100
SK-95	CO-E/AC	<100	<100	<100	<100	<u>684</u>	<100	<100	<500	<u>202</u>	<100	<140
SK-95	KS-D	<100	<100	<100	<100	<u>558</u>	<100	<100	<500	<u>465</u>	<100	<140
SK-95	KS-E	<100	<100	<100	<100	<u>496</u>	<100	<100	<500	<u>145</u>	<100	<140
SK-95	KS-W	<100	<100	<100	<100	<u>954</u>	<100	<100	<500	<u>304</u>	<100	<140
SK-95	SD-S	<100	<100	<100	<100	<u>790</u>	<100	<100	<500	<u>276</u>	<100	<140
SK-95	GA-C	<100	<100	<100	<100	<u>466</u>	<100	<100	<500	<u>103</u>	<100	<140
SK-95	GA-G	<100	<100	<100	<100	<u>439</u>	<100	<100	<500	<100	<100	<140
SK-95	NJ-N	<100	<100	<100	<100	<u>573</u>	<100	<100	<500	<100	<100	<140
SK-95	ID-B	<10	<10	<10	<10	<10	<10	<10	<50	<u>70.5</u>	<10	<14
SK-95	LA-P	<25	<25	<25	<25	<25	<25	<25	<125	<u>102</u>	<25	<35
SK-95	NY-S	<10	<10	34.1	<10	<u>308</u>	<10	<10	105	<u>86.9</u>	<10	<14

PAINT G () CLEANER (5s)

Physical Properties and TCLP Metals Analysis, ppm

Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag	
Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5	
LAB	SITE											
SK-94	SD-S	5.13	0.084	<60	<4.0	1.14	<1.0	2.01	<3.5	<0.04	<0.452	<1.5
SK-94	KS-E	5.12	0.84	<65	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	KS-W	5.75	0.83	<70	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	GA-m	7.28	0.84	<65	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-94	GA-C	8.7	0.84	<70	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	NY-W	4.27	0.84	<70	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-94	NY-A	4.45	0.85	<70	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-94	NY-C	4.51	0.838	<70	<4.0	1.82	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-94	NY-D	4.75	0.84	<70	<4.0	13.35	<1.0	7.18	7.21	<0.04	<0.452	<1.5
SK-94	GA-N	6.77	0.84	<70	<4.0	1.03	<1.0	2.17	11.55	<0.04	<0.452	<1.5
SK-94	NJ - S	6.07	0.87	<70	<4.0	2.83	<1.0	<2.0	6.04	<0.04	<0.45	<1.5
SK-94	ID-B	5.04	0.81	<70	<4.0	1.01	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-95	CO-E/AC	8.02	0.842	<70	<0.40	11.18	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	SD-S	7.11	0.848	<65	<4.00	6.62	<1.00	9.60	24.44	<0.04	<0.45	<1.5
SK-95	KS-E	5.1	0.825	<55	<4.0	1.84	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	KS-W	6.11	0.846	<70	<4.0	1.14	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	GA-C	4.18	0.840	<70	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	NJ-N	4.64	0.838	<70	<4.0	3.54	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	ID-B	7.47	0.806	<70	<4.0	<1.0	<1.0	<2.0	<4.0	<0.04	<0.45	<2.0
SK-95	LA-K	5.57	0.83	<70	<4.00	<1.00	<1.00	<2.00	<4.00	<0.04	<0.45	<2.0
SK-95	NM-A	4.82	0.819	<70	<4.0	<1.0	<1.0	<2.0	<4.0	<0.04	<0.45	<2.0
SK-95	LA-P	6.99	0.842	<70	<5.0	<20	<1.0	<2.0	<5.0	<0.04	<0.45	<1.0
SK-95	NY-S	7.07	0.849	<60	<4.0	<1.0	<1.0	2.22	<4.0	<0.04	<0.45	<2.0
SK-95	NY-W	5.94	0.858	<70	<5.0	38.85	<1.0	<2.0	<5.0	<0.04	<0.45	<1.0
SK-95	MS-J	5.69	0.840	<70	<4.0	6.75	<1.0	<2.0	<4.0	<0.04	<0.45	<2.0
SK-95	NY-A	5.35	0.842	<70	<5.0	<20	<1.0	<2.0	<5.0	<0.04	<0.45	<1.0
SK-95	NJ-S	6.20	0.828	<70	<4.0	<1.0	<1.0	<2.0	4.28	<0.04	<0.45	<1.5
SK-95	NY-T	4.58	0.830	<75	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	GA-N	6.31	0.830	<75	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5

1995

Annual Waste Stream
Recharacterization

Final Report

Prepared by Safety-Kleen Corporation 1/18/96

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PAINT G... CLEANER (5s)

TCLP Semi Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	cresol 200	2,4-DNT 0.13	Cl6-benz 0.13	Cl6-13-but 0.5	Cl6-eth 3	nitrobenz 2	Cl5-phenol 100	pyridine 5	2,4,5-TCP 400	2,4,6-TCP 2
SK-94	SD-S	<2630	<2119	<2200	<4913	<5977	<3431	<17470	<7084	<2065	<7111	
SK-94	KS-E	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	KS-W	<2630	<2119	<2200	<4913	<5977	<3431	<17470	<7084	<2065	<7111	
SK-94	GA-m	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	GA-C	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	NY-W	<2000	<4000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	NY-A	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	NY-C	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	NY-D	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	GA-N	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	NJ - S	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-94	ID-B	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000	
SK-95	CO-E/AC	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	
SK-95	SD-S	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	
SK-95	KS-E	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	
SK-95	KS-W	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118	
SK-95	GA-C	<190	<140	<280	<380	<320	<120	<1800	<180	<90	<120	
SK-95	NJ-N	<190	<144	<280	<380	<320	<124	<1800	<180	<90	<118	
SK-95	ID-B	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	
SK-95	LA-K	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	
SK-95	NM-A	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	
SK-95	LA-P	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	
SK-95	NY-S	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	
SK-95	NY-W	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	
SK-95	MS-J	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	
SK-95	NY-A	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	
SK-95	NJ-S	<190	<144	<280	<380	<320	<124	<1800	<180	<90	<118	
SK-95	NY-T	<190	<144	<280	<380	<320	<124	<1800	<180	<90	<118	
SK-95	GA-N	<190	<144	<280	<380	<320	<124	<1800	<180	<90	<118	

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PAINT G ~~U~~ CLEANER (5s)

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	benzene 0.5	CCl4 0.5	Cibenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
SK-94	SD-S		<u>50</u>	<50	<50	<50	<50	<50	<50	<u>48000</u>	<u>350</u>	<u>270</u>	<100
SK-94	KS-E		<u>51</u>	<2500	<2500	<2500	<2500	<2500	<2500	<u>67000</u>	<u>160</u>	<u>300</u>	<5000
SK-94	KS-W		<50	<50	<50	<50	<50	<50	<50	<u>170000</u>	<u>84</u>	<50	<100
SK-94	GA-m		<50	<50	<50	<50	<50	<50	<50	<u>100000</u>	<u>110</u>	<50	<100
SK-94	GA-C		<50	<50	<50	<50	<50	<50	<50	<u>64400</u>	<u>230</u>	<50	<100
SK-94	NY-W		<5000	<5000	<5000	<5000	<5000	<5000	<5000	<u>107000</u>	<5000	<5000	<1000
SK-94	NY-A		<50	<50	<50	<50	<50	<50	<50	<u>109000</u>	<50	<50	<100
SK-94	NY-C		<50	<50	<50	<50	<50	<50	<50	<u>76100</u>	<50	<50	<100
SK-94	NY-D		<u>54</u>	<50	<50	<50	<50	<50	<50	<u>117000</u>	<u>54</u>	<50	<100
SK-94	GA-N		<2500	<2500	<2500	<2500	<2500	<2500	<2500	<u>62000</u>	<2500	<2500	<5000
SK-94	NJ - S		<u>96</u>	<50	<50	<50	<50	<50	<50	<u>23200</u>	<50	<50	<100
SK-94	ID-B		<50	<50	<50	<50	<50	<50	<50	<u>37800</u>	<50	<50	<100
SK-95	CO-E/AC		<250	<250	<250	<250	<250	<250	<250	<u>49200</u>	<250	<250	<250
SK-95	SD-S		<100	<100	<100	<100	<100	<100	<100	<u>56600</u>	<u>156</u>	<u>138</u>	<140
SK-95	KS-E		<100	<100	<100	<100	<100	<100	<100	<u>65800</u>	<u>134</u>	<u>209</u>	<140
SK-95	KS-W		<100	<100	<100	<100	<100	<100	<100	<u>68500</u>	<100	<100	<140
SK-95	GA-C		<100	<100	<100	<100	<100	<100	<100	<u>92700</u>	<100	<100	<140
SK-95	NJ-N		<100	<100	<100	<100	<100	<100	<100	<u>63400</u>	<100	<100	<140
SK-95	ID-B		<1000	<1000	<1000	<1000	<1000	<1000	<1000	<u>13700</u>	<1000	<1000	<1400
SK-95	LA-K		<100	<100	<100	<100	<100	<100	<100	<u>37900</u>	<100	<100	<140
SK-95	NM-A		<1000	<1000	<1000	<1000	<1000	<1000	<1000	<u>61400</u>	<1000	<1000	<1.40
SK-95	LA-P		<100	<100	<100	<100	<100	<100	<100	<u>22100</u>	<100	<100	<140
SK-95	NY-S		<100	<100	<100	<100	<100	<100	<100	<u>36200</u>	<u>119</u>	<100	<140
SK-95	NY-W		<1000	<1000	<1000	<1000	<1000	<1000	<1000	<u>30800</u>	<1000	<1000	<1400
SK-95	MS-J		<250	<250	<250	<250	<250	<250	<250	<u>26000</u>	<250	<250	<350
SK-95	NY-A		<u>367</u>	<100	<100	<100	<100	<100	<100	<u>246000</u>	<u>491</u>	<u>194</u>	<140
SK-95	NJ-S		<100	<100	<100	<100	<100	<100	<100	<u>150000</u>	<100	<100	<140
SK-95	NY-T		<u>204</u>	<100	<100	<100	<100	<100	<100	<u>76700</u>	<100	<100	<140
SK-95	GA-N		<1000	<1000	<1000	<1000	<1000	<1000	<1000	<u>40700</u>	<1000	<1000	<1400

PAINT WASTE (16s)

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
SK-94	KS-W		6.27	0.90	<65	<4.0	25.83	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	KS-E		5.71	0.88	<65	<0.40	0.157	0.134	0.416	<0.35	<0.0008	<0.750	<0.15
SK-94	GA-m		7.29	0.92	<65	<0.40	6.325	<0.10	<0.20	0.769	0.001	<0.750	<0.15
SK-94	GA-C		7.23	0.88	<70	<0.66	1.71	<0.16	1.339	0.678	<0.0014	<0.73	<0.25
SK-94	NY-W		6.36	0.91	<70	<4.0	8.395	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-94	NY-A		5.78	0.87	<70	<0.40	1.423	<0.10	0.226	<0.35	<0.00080	<0.750	<0.15
SK-94	NY-C		6.32	0.889	<70	<0.40	0.368	<0.10	0.289	0.597	<0.00080	<0.750	<0.15
SK-94	NY-D		7.51	0.818	<75	<0.40	0.921	<0.10	<0.20	1.037	<0.00080	<0.750	<0.15
SK-94	GA-N		6.56	0.851	<70	<4.0	19.61	<1.0	185	885	<0.04	<0.452	<1.5
SK-94	NJ - S		4.68	0.85	<70	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	BU		6.7	0.899	<70	<0.40	0.175	<0.10	2.632	1.475	<0.00080	<0.750	<0.15
SK-95	CO-E/AC		6	0.859	<70	<0.40	2.46	<0.10	0.26	<0.35	<0.0008	<0.75	<0.15
SK-95	KS-E		5.40	0.859	<55	<0.40	0.73	<0.10	<0.20	<0.35	<0.0008	<0.75	<0.15
SK-95	KS-W		5.93	0.884	<70	<0.40	3.1	<0.10	1.36	<0.35	<0.0008	<0.75	<0.15
SK-95	GA-C		7.70	0.892	<74	<0.4	1.16	<0.10	<0.20	<0.35	<0.0008	<0.75	<0.15
SK-95	LA-P		6.35	0.889	<70	<0.40	0.81	<0.10	16.51	<0.35	<0.0008	<0.75	<0.15
SK-95	NY-S		4.98	0.925	<70	<0.40	<0.10	<0.10	4.04	<0.35	<0.0008	<0.75	<0.15
SK-95	LA-K		6.13	0.932	<80	<0.40	0.159	<0.10	4.45	0.5	<0.0008	<0.75	<0.15
SK-95	MS-J		5.67	0.877	<70	<4.0	<1.0	<1.0	6.41	<4.0	<0.04	<0.45	<2.0
SK-95	NY-A		6.60	0.904	<70	<0.40	0.31	<0.10	<0.20	<0.35	<0.0008	<0.75	<0.15
SK-95	NJ-S		4.73	0.867	<70	<4.0	9.07	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	NY-T		6.83	0.880	<60	<4.0	11.54	<1.0	5.41	<3.5	<0.04	<0.45	<1.5
SK-95	GA-N		6.19	0.830	<70	<4.0	1.49	<1.0	<2.0	4.97	<0.04	<0.45	<1.5
SK-95	NM-A		6.46	0.895	<70	<4.0	0.886	<1.0	<0.20	<4.0	<0.0008	<0.75	<0.15
SK-95	NY-N		6.06	0.864	<70	<4.0	11.7	<1.0	7.29	<4.0	<0.04	<0.45	<2.0
SK-95	DE		5.86	0.844	<70	<0.40	0.515	<0.10	0.51	<0.35	<0.0008	<0.75	<0.15
SK-95	NE-O		5.33	0.869	<70	<0.40	1.22	<0.10	0.29	<0.35	<0.0008	<0.75	<0.15
SK-95	NE-GI		5.83	0.869	<70	<0.40	2.49	<0.10	1.1	<0.35	<0.0008	<0.75	<0.15
SK-95	NY-L		5.50	0.843	<75	<4.0	15.1	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	GA-m		7.70	0.892	<74	<0.4	1.16	<0.10	<0.20	<0.35	<0.0008	<0.75	<0.15

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PAINT WASTE (16s)

TCLP Semi Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	cresol 200	2,4-DNT 0.13	Cl6-benz 0.13	Cl6-13-but 0.5	Cl6-eth 3	nitrobenz 2	Cl5-phenol 100	pyridine 5	2,4,5-TCP 400	2,4,6-TCP 2
SK-94	KS-W	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	KS-E	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	GA-m	0.89	<0.029	<0.054	<0.077	<0.062	<0.025	<0.36	<0.036	<0.018	<0.024	<0.024
SK-94	GA-C	<142.5	<142	<142	<142	<142	<142	<143	<72.13	<142	<142	<142
SK-94	NY-W	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	NY-A	<0.059	<0.036	<0.070	<0.095	<0.080	<0.031	<0.45	<0.045	<0.022	<0.030	<0.030
SK-94	NY-C	<0.047	<0.029	<0.054	<0.077	<0.062	<0.025	<0.36	<0.036	<0.018	<0.024	<0.024
SK-94	NY-D	2.57	<0.036	<0.68	<0.96	<0.78	<0.31	<4.5	<0.45	<0.22	<0.29	<0.29
SK-94	GA-N	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	NJ - S	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	BU	0.113	<0.029	<0.054	<0.077	<0.062	<0.025	<0.36	0.11	<0.018	<0.024	<0.024
SK-95	CO-E/AC	<190	<144	<272	<384	<312	<124	<1790	<180	<90	<118	<118
SK-95	KS-E	<190	<140	<280	<380	<320	<120	<1800	<180	<90	<120	<120
SK-95	KS-W	<190	<140	<280	<380	<320	<120	<1800	<180	<90	<120	<120
SK-95	GA-C	<0.048	<0.036	<0.070	<0.095	<0.080	0.59	<0.45	2.9	<0.022	<0.030	<0.030
SK-95	LA-P	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380
SK-95	NY-S	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380
SK-95	LA-K	0.53	<0.092	<0.140	<0.240	<0.240	<0.130	<0.048	<0.140	<0.140	<0.150	<0.150
SK-95	MS-J	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380
SK-95	NY-A	<0.110	<0.092	<0.140	<0.240	<0.240	<0.130	<0.048	<0.140	<0.140	<0.150	<0.150
SK-95	NJ-S	<190	<144	<280	<380	<320	<124	<1800	<180	<90	<118	<118
SK-95	NY-T	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380
SK-95	GA-N	<190	<144	<280	<380	<320	<124	<1800	<180	<90	<118	<118
SK-95	NM-A	<1.4	<1.2	<1.7	<3.0	<3.0	<1.6	<0.60	<1.8	<1.8	<1.9	<1.9
SK-95	NY-N	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380
SK-95	DE	<0.070	<0.058	<0.085	<0.150	<0.150	<0.080	<0.030	<1.8	<0.090	<0.095	<0.095
SK-95	NE-O	0.72	<0.092	<0.140	<0.240	<0.240	<0.130	<0.048	<0.140	<0.140	<0.150	<0.150
SK-95	NE-GI	<0.110	<0.092	<0.140	<0.240	<0.240	<0.130	<0.048	<0.140	<0.140	<0.150	<0.150
SK-95	NY-L	<280	<230	<340	<590	<600	<320	<120	<360	<360	<380	<380
SK-95	GA-m	<0.048	<0.036	<0.070	<0.095	<0.080	0.59	<0.45	2.9	<0.022	<0.030	<0.030

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PAINT WASTE (16s)

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	benzene 0.5	CCI4 0.5	Clbenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
SK-94	KS-W	<50	<50	<50	<50	<50	<50	<50	<50	<u>73000</u>	<50	<50	<100
SK-94	KS-E	<2500	<2500	<2500	<2500	<2500	<2500	<2500	<2500	<u>9500</u>	<2500	<2500	<5000
SK-94	GA-m	<10	<10	<10	<10	<10	<10	<10	<10	<u>1050</u>	<10	<10	<14
SK-94	GA-C	<2.50	<2.32	<2.32	<2.32	<2.32	<2.32	<2.32	<2.32	<u>2685</u>	<2.32	<2.32	<4.58
SK-94	NY-W	<50	<50	<50	<50	<50	<50	<50	<50	<u>64200</u>	<50	<50	<100
SK-94	NY-A	0.29	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1500</u>	<0.10	<0.10	<0.14
SK-94	NY-C	0.21	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>459</u>	<0.10	<0.10	<0.14
SK-94	NY-D	0.17	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<u>3000</u>	<0.1	<0.1	<0.1
SK-94	GA-N	<50	<50	<50	<50	<50	<50	<50	<50	<u>63800</u>	<50	<50	<100
SK-94	NJ - S	<50	<50	<50	<50	<50	<50	<50	<50	<u>99300</u>	<50	<50	<100
SK-94	BU	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1540</u>	<0.10	<0.10	<0.14
SK-95	CO-E/AC	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1440</u>	0.19	<0.10	<0.14
SK-95	KS-E	0.25	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1230</u>	<0.10	<0.10	<0.14
SK-95	KS-W	<100	<100	<100	<100	<100	<100	<100	<100	<u>12400</u>	<100	<100	<140
SK-95	GA-C	0.37	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1020</u>	<0.10	<0.10	<0.14
SK-95	LA-P	0.17	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1480</u>	<0.10	<0.10	<0.14
SK-95	NY-S	0.24	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>2610</u>	<0.10	<0.10	<0.14
SK-95	LA-K	0.1	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1460</u>	<0.10	<0.10	<0.14
SK-95	MS-J	<100	<100	<100	<100	<100	<100	<100	<100	<u>12000</u>	<100	<100	<140
SK-95	NY-A	0.15	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>256</u>	<u>0.87</u>	<0.10	<0.14
SK-95	NJ-S	<u>104</u>	<100	<100	<100	<100	<100	<100	<100	<u>27900</u>	<100	<100	<140
SK-95	NY-T	<100	<100	<100	<100	<100	<100	<100	<100	<u>20500</u>	<100	<100	<140
SK-95	GA-N	<100	<100	<100	<100	<100	<100	<100	<100	<u>12800</u>	<100	<100	<140
SK-95	NM-A	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1410</u>	0.28	<0.10	<0.14
SK-95	NY-N	<100	<100	<100	<100	<100	<100	<100	<100	<u>54900</u>	<100	<100	<140
SK-95	DE	<25	<25	<25	<25	<25	<25	<25	<25	<u>3020</u>	<25	<25	<0.14
SK-95	NE-O	0.18	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>640</u>	<0.10	<0.10	<0.14
SK-95	NE-GI	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<u>2180</u>	<0.25	<0.25	<0.35
SK-95	NY-L	<100	<100	<100	<100	<100	<100	<100	<100	<u>12700</u>	<100	<100	<140
SK-95	GA-m	0.37	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<u>1020</u>	<0.10	<0.10	<0.14

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PARTS WATER SOLVENT 105

Physical Properties and TCLP Metals Analysis, ppm

Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag	
Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5	
LAB	SITE											
SK-94	ND-B	7.83	1.23	128	<0.40	1.01	0.43	<0.20	0.6	<0.0008	<0.750	<0.15
SK-94	FA	7.1	1.33	126	<0.42	1.199	<u>6.353</u>	0.218	<u>13.541</u>	<0.0008	<0.75	<0.16
SK-94	GA-m	7.22	1.25	>200	<4.0	7.82	<1.0	<u>13.24</u>	3.85	<0.04	0.615	<1.5
SK-94	GA-G	6.43	0.8905	134	<0.51	0.612	<0.13	<0.25	<0.44	0.009	<0.74	<0.19
SK-94	GA-C	8.7	0.84	<70	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	GA-N	7.82	1.4	131	<0.40	0.842	1.09	<0.20	2.601	<0.0008	<0.750	<0.15
SK-94	NY-A	7.05	0.677	>200	<0.40	<0.10	<0.10	<0.20	<0.35	<0.00080	<0.750	<0.15
SK-94	NY-A	4.27	1.034	>200	<0.40	0.297	<0.10	0.746	<0.35	0.00084	<0.750	<0.15
SK-94	NY-D	6.27	1.67	>140	<0.40	0.7375	<0.10	<0.20	<0.35	<0.00080	<0.750	<0.15
SK-94	GA-N	5.56	0.992	>200	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.452	<1.5
SK-94	NJ - S	6.07	0.87	<70	<4.0	2.83	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	NJ - B	7.21	1.37	130	<0.43	1.112	0.547	<0.22	0.45	0.0011	<0.75	<0.16
SK-94	NJ - N	6.65	0.89	<70	<0.40	0.441	<0.10	0.513	<0.35	<0.0008	<0.75	<0.15
G-94	WV-N	N/A	0.72	135	<0.50	<20	<0.50	<1.0	<u>6.3</u>	<0.10	<0.20	<1.0
G-94	WV-N	N/A	0.73	130	<0.50	<20	<0.50	<1.0	<3.0	<0.10	<0.20	<1.0
G-94	WV-W	N/A	0.8	120	<0.50	<20	<0.50	<1.0	<u>6.4</u>	<0.10	<0.20	<1.0
G-94	WV-W	N/A	0.76	130	<0.50	<20	<0.50	<1.0	<3.0	<0.10	<0.20	<1.0
G-94	WV-W	N/A	0.87	>200	<0.50	<20	<u>22</u>	1.7	<u>53</u>	<u>0.39</u>	<0.20	<1.0
SK-94	KS-W	7.17	0.8	148	<4.0	1.96	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	CO-E-DE	8.06	0.81	141	<0.40	1.71	<u>1.02</u>	<2.0	<u>7.97</u>	<0.04	<0.45	<1.5
SK-95	BI	8.03	0.79	128	<4.00	3.56	<u>2.88</u>	<2.00	<u>8.81</u>	<0.04	<0.45	<1.5
SK-95	CO-GJ-RE	7.64	0.8	131	<0.40	1.71	<1.0	<2.0	<u>10.67</u>	<0.04	<0.45	<1.5
SK-95	CO-P-DE	8.8	0.811	143	<0.40	1.31	<1.0	<2.0	<u>5.14</u>	<0.04	<0.45	<1.5
SK-95	FA	7.17	0.811	>142	<4.00	1.8	<1.00	<2.00	<u>3.88</u>	<0.04	<0.452	<1.5
SK-95	KS-D	6.84	0.792	>142	<4.0	1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	KS-E	6.75	0.789	138	<4.0	3.94	<u>1.24</u>	<2.0	<u>5.16</u>	<0.04	<0.45	<1.5
SK-95	KS-W	7.13	0.803	144	<4.0	1.26	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	SD-S	7.44	0.795	134	<4.00	1.48	<u>1.32</u>	<2.00	<u>11.64</u>	<0.04	<0.45	<1.5
SK-95	WA-S	7.29	0.812	>142	<4.0	1.88	<1.0	<2.0	<u>7.43</u>	<0.04	<0.45	<1.5

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TCLP Semi Volatiles Analysis, ppm

Parameter	Reg. Limit	cresol	2,4-DNT	Cl6-benz	Cl6-13-but	Cl6-eth	nitrobenz	Cl5-phenol	pyridine	2,4,5-TCP	2,4,6-TCP
		200	0.13	0.13	0.5	3	2	100	5	400	2
LAB	SITE										
SK-94	ND-B	0.68	<0.036	<0.068	<0.096	<0.078	<0.031	<0.45	<0.045	<0.023	<0.05
SK-94	FA	<17.49	<14	<14	<31	<38	<22	<112	<45	<13	<46
SK-94	GA-m	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	GA-G	117.96	<58	<58	<58	<58	<58	<58	<29	<58	<58
SK-94	GA-C	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	GA-N	0.451	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04	<0.02	<0.04	<0.04
SK-94	NY-A	<0.052	<0.044	<0.044	<0.10	<0.12	<0.068	<0.35	<0.14	<0.040	<0.14
SK-94	NY-A	<0.295	<0.18	<0.34	<0.48	<0.39	<0.16	<2.2	<0.22	<0.11	<0.15
SK-94	NY-D	<0.052	<0.044	<0.044	<0.10	<0.12	<0.068	<0.35	<0.14	<0.040	<0.14
SK-94	GA-N	<1	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.25	<0.5	<0.5
SK-94	NJ - S	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	NJ - B	<36	<18	<18	<18	<18	<18	<18	<9	<18	<18
SK-94	NJ - N	0.141	<0.014	<0.028	<0.038	<0.032	<0.012	<0.18	<0.013	<0.0090	<0.012
G-94	WV-N	<1000	<500	<500	<500	<500	<500	<2500	0	<500	<500
G-94	WV-N	<1000	<500	<500	<500	<500	<500	<2500	0	<500	<500
G-94	WV-W	<1000	<500	<500	<500	<500	<500	<2500	0	<500	<500
G-94	WV-W	<1000	<500	<500	<500	<500	<500	<2500	0	<500	<500
G-94	WV-W	<2000	<10000	<10000	<10000	<10000	<10000	<50000	0	<10000	<10000
SK-94	KS-W	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-95	CO-E-DE	<190	<144	<272	<384	<312	<124	<1800	<180	<90	<120
SK-95	BI	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-95	CO-GJ-RE	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118
SK-95	CO-P-DE	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118
SK-95	FA	<190	<140	<280	<380	<320	<120	<1800	<180	<90	<120
SK-95	KS-D	<190	<140	<280	<380	<320	<120	<1800	<180	<90	<120
SK-95	KS-E	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118
SK-95	KS-W	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118
SK-95	SD-S	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118
SK-95	WA-S	<190	<144	<280	<380	<320	<124	<1800	<180	<90	<118

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TCLP Volatiles Analysis, ppm

Parameter	benzene	CCl4	Clbenz	CHCl3	1,4-DCIB	1,2-DCA	1,1-DCE	MEK	PCE	TCE	VChloride
Reg. Limit	0.5	0.5	100	6	7.5	0.5	0.7	200	0.7	0.5	0.2
LAB	SITE										
SK-94	ND-B	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.500	0.4	<0.100	<0.140
SK-94	FA	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<1.20	<u>0.74</u>	<0.24	<0.42
SK-94	GA-m	<50	<50	<50	<50	<50	<50	<250	<u>515000</u>	120	<100
SK-94	GA-G	<1.48	<1.48	<1.48	<1.48	<1.48	<1.48	<7.41	<u>12.77</u>	<1.48	<2.91
SK-94	GA-C	<50	<50	<50	<50	<50	<50	<u>64400</u>	<u>230</u>	<50	<100
SK-94	GA-N	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.14	<0.10	<0.14
SK-94	NY-A	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>45</u>	<0.10	<0.14
SK-94	NY-A	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>155</u>	<0.10	<0.14
SK-94	NY-D	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>215</u>	<0.10	<0.14
SK-94	GA-N	<50	<50	<50	<50	<50	<50	<u>718</u>	<u>3850</u>	<50	<100
SK-94	NJ - S	<u>96</u>	<50	<50	<50	<50	<50	<u>23200</u>	<50	<50	<100
SK-94	NJ - B	<0.92	<0.46	<0.46	<0.46	<0.46	<0.46	<2.30	<u>22.99</u>	<0.46	<0.86
SK-94	NJ - N	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<u>4620</u>	<2.5	<2.5	<3.5
G-94	WV-N	<50	<50	<50	<50	<100	<50	<200	<u>3700</u>	<u>60</u>	<100
G-94	WV-N	<50	<50	<50	<50	<100	<50	<200	<u>720</u>	<u><50</u>	<100
G-94	WV-W	<50	<50	<50	<50	<100	<50	<200	<u>2900</u>	780	<100
G-94	WV-W	<50	<50	<50	<50	<100	<50	<200	<u>1000</u>	<u><50</u>	<100
G-94	WV-W	<50	<50	<50	<50	<u>710</u>	<50	<200	<u>110</u>	<50	<100
SK-94	KS-W	<50	<50	<50	<50	<50	<50	<250	<u>940</u>	<50	<100
SK-95	CO-E-DE	<100	<100	<100	<100	<100	<100	<500	<u>662</u>	<100	<140
SK-95	BI	<100	<100	<100	<100	<100	<100	<500	<u>1140</u>	<u>139</u>	<140
SK-95	CO-GJ-RE	<100	<100	<100	<100	<100	<100	<500	<u>1610</u>	<100	<140
SK-95	CO-P-DE	<100	<100	<100	<100	<100	<100	<500	<u>784</u>	<100	<140
SK-95	FA	<100	<100	<100	<100	<100	<100	<500	<u>311</u>	<100	<140
SK-95	KS-D	<100	<100	<100	<100	<100	<100	<500	<u>201</u>	<100	<140
SK-95	KS-E	<100	<100	<100	<100	<100	<100	<500	<u>833</u>	<100	<140
SK-95	KS-W	<100	<100	<100	<100	<100	<100	<500	<u>1560</u>	<100	<140
SK-95	SD-S	<100	<100	<100	<100	<100	<100	<500	<u>761</u>	<100	<140
SK-95	WA-S	<u>1.1</u>	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	<u>2.5</u>	<1.0	<1.4

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Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
SK-94	ND-B		7.83	1.23	128	<0.40	1.01	0.43	<0.20	0.6	<0.0008	<0.750	<0.15
SK-94	FA		7.1	1.33	126	<0.42	1.199	6.353	0.218	13.541	<0.0008	<0.75	<0.16
SK-94	SD-S		7.1	1.32	126	<0.50	2.38	0.781	<0.25	1.49	<0.0008	<0.74	<0.19
SK-94	GA-m		7.4	0.9119	136	<0.57	0.928	0.775	<0.28	19.306	0.003	<0.74	<0.21
SK-94	GA-G		6.43	0.8905	134	<0.51	0.612	<0.13	<0.25	<0.44	0.009	<0.74	<0.19
SK-94	GA-C		5.58	1.45	137	<0.46	0.966	0.792	<0.23	3.414	<0.0014	<0.75	<0.17
SK-94	NY-A		7.69	1.66	104	<0.44	1.089	1.644	<0.22	3	<0.0012	<0.75	<0.16
SK-94	NY-C		7.63	1.581	129	<0.42	0.804	1.08	<0.21	0.386	0.00119	<0.75	<0.16
SK-94	NY-D		7.16	1.126	131	<0.45	1.529	0.586	<0.23	2.334	0.00148	<0.75	<0.17
SK-94	GA-N		7.82	1.4	131	<0.40	0.842	1.09	<0.20	2.601	<0.0008	<0.750	<0.15
SK-94	NJ - S		7.92	1.135	102	<0.60	0.935	0.773	<0.30	6.04	0.03332	<0.73	<0.23
SK-94	NJ - B		7.21	1.37	130	<0.43	1.112	0.547	<0.22	0.45	0.0011	<0.75	<0.16
SK-94	ID-B		7.44	1.22	119	<0.52	1.211	0.75	0.268	1.302	<0.0021	<0.74	<0.19
SK-94	KS-E		8.4	1.28	129	<0.64	<0.64	0.12	<0.22	0.561	<0.0012	<0.75	<0.16
SK-95	CO-E/AC		8.16	1.53	98	<0.40	0.94	0.61	<0.2	0.87	<0.0008	<0.75	<0.15
SK-95	BI		8.17	1.48	129	<0.40	1.07	1.03	<0.20	1.07	<0.0008	<0.75	<0.15
SK-95	FA		7.2	1.359	>142	<0.40	1.05	0.65	<0.20	2.93	<0.0008	<0.75	<0.15
SK-95	SD-S		7.65	1.42	108	<0.44	0.89	0.78	<0.22	0.93	<0.001	<0.75	<0.16
SK-95	KS-E		8.42	1.3	114	<0.40	1.08	1.05	<0.20	21.43	<0.0008	<0.75	<0.15
SK-95	KS-W		7.51	0.936	122	<0.40	0.47	0.33	<0.20	2.22	0.0077	<0.75	<0.15
SK-95	GA-C		7.47	1.45	121	<0.4	0.88	0.4	<0.2	3.3	<0.0008	<0.75	<0.15
SK-95	GA-G		7.16	1.34	143	<0.4	1.56	0.92	<0.2	0.92	<0.0008	<0.75	<0.15
SK-95	NJ-N		7.00	0.828	142	<4.0	3.72	1.38	<2.0	21.59	0.05	<0.45	<1.5
SK-95	KS-D		7.03	1.65	138	<0.87	1.61	0.53	<0.43	10.6	<0.0059	<0.71	<0.33
SK-95	NJ-B		7.31	1.24	141	<0.40	0.97	1.29	<0.20	1.03	0.0078	<0.75	<0.15
SK-95	DE		7.21	1.58	148	<0.65	1.15	<0.16	<0.33	5.48	<0.004	<0.73	<0.24
SK-95	LA-P		8.16	1.37	144	<0.40	1.17	0.59	<0.20	40.45	<0.0008	<0.75	<0.15
SK-95	LA-K		8.15	1.526	142	<0.40	0.883	1.02	<0.20	29.7	<0.0008	<0.75	<0.15
SK-95	NY-S		7.59	1.47	141	<0.40	1.02	0.62	<0.20	0.79	<0.0008	<0.75	<0.15

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PARTS WASH SOLVENT SLUDGE

TCLP Semi Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	cresol 200	2,4-DNT 0.13	Cl6-benz 0.13	Cl6-13-but 0.5	Cl6-eth 3	nitrobenz 2	Cl5-phenol 100	pyridine 5	2,4,5-TCP 400	2,4,6-TCP 2
SK-94	ND-B		0.68	<0.036	<0.068	<0.096	<0.078	<0.031	<0.45	<0.045	<0.023	<0.05
SK-94	FA		<17.49	<14	<14	<31	<38	<22	<112	<45	<13	<46
SK-94	SD-S		<76.25	<60	<63	<140	<170	<98	<499	<202	<59	<203
SK-94	GA-m		184.9	<92	<92	<92	<92	<92	<92	<92	<92	<92
SK-94	GA-G		117.96	<58	<58	<58	<58	<58	<58	<29	<58	<58
SK-94	GA-C		<66.02	<32	<32	<32	<32	<32	<32	<16	<32	<32
SK-94	NY-A		40.4	<20	<20	<20	<20	<20	<20	<10	<20	<20
SK-94	NY-C		<24	<12	<12	<12	<12	<12	<13	<6	<12	<12
SK-94	NY-D		<58	<29	<29	<29	<29	<29	<29	<14	<29	<29
SK-94	GA-N		0.451	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04	<0.02	<0.04	<0.04
SK-94	NJ - S		<224	<112	<112	<112	<112	<112	<112	<56	<112	<112
SK-94	NJ - B		<36	<18	<18	<18	<18	<18	<18	<9	<18	<18
SK-94	ID-B		<130	<65	<66	<66	<66	<65	<66	<33	<65	<65
SK-94	KS-E		34	<23	<24	<54	<66	<38	<192	<78	<22	<78
SK-95	CO-E/AC		<137.5	<112.5	<62.5	<75	<112.5	<75	<150	<362.5	<75	<162.5
SK-95	BI		1.4	<0.029	<0.054	<0.077	<0.062	<0.025	<0.359	<0.036	<0.018	<0.024
SK-95	FA		<190	<160	<88	<100	<160	<100	<210	<510	<100	<160
SK-95	SD-S		<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118
SK-95	KS-E		1.6	<0.029	<0.056	<0.076	<0.064	<0.025	<0.36	<0.036	<0.018	<0.024
SK-95	KS-W		1.2	<0.058	<0.109	<0.154	<0.125	0.13	<0.718	<0.072	<0.036	<0.047
SK-95	GA-C		1.2	<0.058	<0.11	<0.15	<0.13	<0.050	<0.72	<0.072	<0.036	<0.047
SK-95	GA-G		<0.076	<0.058	<0.11	<0.15	<0.13	<0.050	<0.72	<0.072	<0.036	<0.047
SK-95	NJ-N		<190	<140	<280	<380	<320	<120	<1800	<180	<90	<120
SK-95	KS-D		48	<36.02	<68.04	<96.06	<78.05	<31.02	<448.77	<45.03	<22.51	<29.52
SK-95	NJ-B		<0.48	<0.36	<0.70	<0.95	<0.80	<0.31	<4.50	<0.45	<0.22	<0.30
SK-95	DE		<280	<230	<340	<590	<600	<320	<120	<360	<360	<380
SK-95	LA-P		0.39	<0.092	<0.140	<0.240	<0.240	<0.130	<0.048	<0.140	<0.140	<0.150
SK-95	LA-K		<0.040	<0.040	<0.040	<0.042	<0.085	<0.044	<0.040	<0.040	<0.040	<0.042
SK-95	NY-S		<0.110	<0.092	<0.140	<0.240	<0.240	<0.130	<0.048	<0.140	<0.140	<0.150

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PARTS WASH SOLVENT SLUDGE

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	benzene 0.5	CCI4 0.5	Cibenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
SK-94	ND-B	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	<0.500	0.4	<0.100	<0.140
SK-94	FA	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<1.20	0.74	<0.24	<0.42
SK-94	SD-S	<0.69	<0.69	<0.69	<0.69	<0.69	<0.69	<0.69	<0.69	3.74	9.09	<0.69	<1.32
SK-94	GA-m	<1.91	<1.91	<1.91	<1.91	<1.91	<1.91	<1.91	<1.91	<9.56	23.98	<1.91	<3.76
SK-94	GA-G	<1.48	<1.48	<1.48	<1.48	<1.48	<1.48	<1.48	<1.48	<7.41	12.77	<1.48	<2.91
SK-94	GA-C	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94	<0.94	23.86	6.92	<0.94	<1.82
SK-94	NY-A	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<1.350	<0.27	<0.27	<0.48
SK-94	NY-C	<0.59	<0.59	<0.59	<0.59	<0.59	<0.59	<0.59	<0.59	2.97	6.76	<0.59	<1.13
SK-94	NY-D	<0.66	<0.66	<0.66	<0.66	<0.66	<0.66	<0.66	<0.66	3.34	41.01	1.44	<1.26
SK-94	GA-N	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.14	<0.10	<0.14
SK-94	NJ - S	3.83	<2.11	<2.11	<2.11	<2.11	<2.11	<2.11	<2.11	<10.53	112.3	4.21	<2.11
SK-94	NJ - B	<0.92	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<2.30	22.99	<0.46	<0.86
SK-94	ID-B	<1.19	<1.19	<1.19	<1.19	<1.19	<1.19	<1.19	<1.19	<5.96	39.43	<1.19	<2.33
SK-94	KS-E	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<0.74	<3.69	14.4	<0.74	<1.42
SK-95	CO-E/AC	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.37	0.36	<0.14
SK-95	BI	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	1.2	0.26	<0.14
SK-95	FA	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	1.1	0.67	<0.10	<0.14
SK-95	SD-S	<100	<100	<100	<100	<100	<100	<100	<100	<500	341	<100	<140
SK-95	KS-E	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<1.2	0.56	0.17	<0.14
SK-95	KS-W	4.4	1.5	<1.0	<1.0	4.6	1.2	<1.0	<5.0	190	2	<1.4	<1.4
SK-95	GA-C	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.26	<0.10	<0.14
SK-95	GA-G	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.35	<0.10	<0.14
SK-95	NJ-N	<100	<100	<100	<100	<100	<100	<100	<100	<500	1300	<100	<140
SK-95	KS-D	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	<5.5	5.8	<1.1	<1.14
SK-95	NJ-B	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.67	<0.10	<0.14
SK-95	DE	<0.18	<0.18	<0.18	<0.18	<0.18	<0.18	<0.18	<0.18	<0.88	16.15	<0.18	<0.25
SK-95	LA-P	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<0.10	<0.10	<0.14
SK-95	LA-K	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	1.2	0.47	0.19	<0.14
SK-95	NY-S	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.73	<0.10	<0.14

PARTS WASHER SOLVENT 150

Physical Properties and TCLP Metals Analysis, ppm

LAB	Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
	Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5
LAB	SITE											
SK-94	KS-E	5.26	0.810	157	<4.0	<1.0	<u>1.71</u>	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	KS-W	7.17	0.800	148	<4.0	1.96	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	KS-E			>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	MS-J			>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	OK-T	7.00		>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	LA-P				<4.0	3.81	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	LA-P	6.50		>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	LA-P				<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	IL-D				<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	IL-D				<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	NC-R			>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	SC-G	8.10		>142	<4.0	<1.0	<1.0	<2.0	<u>6.05</u>	<0.04	<0.45	<1.5
SK-94	SC-G	6.90		>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	WV-N				<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	WV-N				<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	WV-N				<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	WV-N				<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	NJ-N	5.90		>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	NJ-N			154	<4.5	<0.5	<0.5	<0.5	<3.5	<0.04	<0.359	<1.0
SK-94	NJ-B	6.80		>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	NJ-B				<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	GA-C				<4.5	<0.5	<0.5	<0.5	<3.5	<0.04	<0.359	<1.0
SK-94	GA-G			>142	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	GA-G				<4.5	1.76	<0.5	<0.5	<3.5	<0.04	<0.359	<1.0
SK-94	GA-G				<4.5	0.67	<0.5	<0.5	<3.5	<0.04	<0.359	<1.0
SK-94	NY-C	8.1		153	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-94	NY-C			153	<4.5	3.03	<0.5	<0.5	<3.5	<0.04	<0.359	<1.0
SK-94	NY-C	6.3		154	<4.5	<0.5	<0.5	0.565	3.53	<0.04	<0.359	<1.0
SK-94	NY-W	7		158	<4.5	1.53	<0.5	<0.5	<3.5	<0.04	<0.359	<1.0

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PARTS WASHER SOLVENT 150

TCLP Semi Volatiles Analysis, ppm

LAB	Parameter SITE	cresol Reg. Limit 200	2,4-DNT 0.13	Cl6-benz 0.13	Cl6-13-but 0.5	Cl6-eth 3	nitrobenz 2	Cl5-phenol 100	pyridine 5	2,4,5-TCP 400	2,4,6-TCP 2
SK-94	KS-E	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	KS-W	<2000	<2000	<2000	<2000	<2000	<2000	<2000	<1000	<2000	<2000
SK-94	KS-E	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	MS-J	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	OK-T	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	LA-P	<234	<144	<280	<380	<320	<124	<1800	<180	<90	<118
SK-94	LA-P	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	LA-P	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	IL-D	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	IL-D	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	NC-R	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	SC-G	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	SC-G	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	WV-N	<234	<144	<272	<84	<312	<124	<1790	<180	<90	<118
SK-94	WV-N	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	WV-N	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	WV-N	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	NJ-N	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	NJ-N	<234	<144	<280	<380	<320	<124	<1800	<180	<90	<118
SK-94	NJ-B	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	NJ-B	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	GA-C	<234	<144	<280	<380	<320	<124	<1800	<180	<90	<118
SK-94	GA-G	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	GA-G	<234	<144	<280	<380	<320	<124	<1800	<180	<90	<118
SK-94	GA-G	<234	<144	<280	<380	<320	<124	<1800	<180	<90	<118
SK-94	NY-C	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	NY-C	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	NY-C	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118
SK-94	NY-W	<234	<144	<272	<384	<312	<124	<1790	<180	<90	<118

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PARTS WASH WATER SOLVENT 150

TCLP Volatiles Analysis, ppm

LAB	SITE	benzene Reg. Limit 0.5	CCI4 0.5	Cibenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
SK-94	KS-E	<50	<50	<50	<50	<50	<50	<50	<250	<50	<50	<100
SK-94	KS-W	<50	<50	<50	<50	<50	<50	<50	<250	940	<50	<100
SK-94	KS-E	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	1.7	<0.1	<0.1	<0.14
SK-94	MS-J	0.62	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	0.88	0.2	<0.14
SK-94	OK-T	0.17	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	0.22	<0.1	<0.14
SK-94	LA-P	3.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.49	<0.5	0.11	0.22	<0.14
SK-94	LA-P	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	0.51	<0.1	<0.14
SK-94	LA-P	<0.1	<0.1	<0.1	0.2	<0.1	<0.1	<0.1	<0.5	<0.1	<0.1	<0.14
SK-94	IL-D	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	<0.1	<0.1	<0.14
SK-94	IL-D	0.14	<0.1	<0.1	<0.1	<0.1	0.28	<0.1	11	12	2.4	<0.14
SK-94	NC-R	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	<0.1	<0.1	<0.14
SK-94	SC-G	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	<0.1	<0.1	<0.14
SK-94	SC-G	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	<0.1	<0.1	<0.14
SK-94	WV-N	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	20	<1.0	<1.4
SK-94	WV-N	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	2.7	0.1	<0.14
SK-94	WV-N	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	20	<1.0	<1.4
SK-94	WV-N	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	2.7	0.1	<0.14
SK-94	NJ-N	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	13.4	<0.5	0.2	<0.1	<0.14
SK-94	NJ-N	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<1.25	1.8	<0.25	<0.35
SK-94	NJ-B	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	1.5	<0.1	<0.14
SK-94	NJ-B	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	0.23	<0.1	<0.14
SK-94	GA-C	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	3.3	0.89	<0.14
SK-94	GA-G	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	12.3	<0.1	<0.14
SK-94	GA-G	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.21	<0.5	<0.1	<0.1	<0.14
SK-94	GA-G	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	<0.1	<0.1	<0.14
SK-94	NY-C	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	1.3	<0.1	<0.14
SK-94	NY-C	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5	0.2	<0.1	<0.14
SK-94	NY-C	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.74	2	<0.1	<0.14
SK-94	NY-W	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.73	<0.1	<0.1	<0.14

PWS TANK BOTTOMS

Physical Properties and TCLP Metals Analysis, ppm

Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag	
Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5	
LAB	SITE											
SK-94	SD-S	7.23	0.82	128	<4.00	2.256	<1.00	<2.00	5.844	<0.04	<0.45	<1.5
SK-94	NY-A	7.68	1.577	112	<0.45	1.037	<1.264	<0.23	2.445	<0.0014	<0.75	<0.17
SK-94	ID-B	7.78	1.242	108	<0.40	1.179	0.679	0.201	0.7955	<0.00080	<0.750	<0.15
SK-95	FA	6.58	1.132	98	<0.40	1.19	0.86	<0.20	0.49	<0.0008	<0.75	<0.15
SK-95	DE	7.81	0.856	>200	<0.40	0.21	<0.10	<0.20	3.06	<0.0008	<0.75	<0.15
SK-95	SC-G	7.00	1.14	136	<0.58	2.16	0.371	<0.29	1.84	<0.0028	<0.74	<0.22
SK-95	NY-N	5.30	1.02	128	<0.58	0.41	2.19	<0.29	0.89	<0.003	<0.74	<0.22
SK-95	NE-GI	7.51	1.33	136	<0.40	1.36	0.683	<0.20	1.85	<0.0008	<0.75	<0.15
SK-95	NE-O	8.05	1.11	124	<0.40	1.53	1.11	<0.20	2.26	<0.0008	<0.75	<0.15
SK-95	NY-L	6.53	0.791	114	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	BI	8.01	1.05	85	<0.40	1.7	0.579	<0.20	<0.35	<0.0008	<0.75	<0.15
SK-95	CO-E	8.17	1.28	140	<0.40	1.19	0.862	<0.20	1.14	<0.0008	<0.75	<0.15
SK-95	DO	6.51	0.876	>200	<0.40	0.314	0.135	<0.20	1.73	<0.0008	<0.75	<0.15
SK-95	ID-B	7.59	1.265	128	<0.40	0.86	0.44	<0.20	0.95	0.0017	<0.75	<0.15
MAX		8.17	1.577	140	0	2.256	2.19	0.201	5.844	0.0017	0	0
MIN		5.3	0.791	85	0	0.21	0.135	0.201	0.49	0.0017	0	0

PWS TANK BOTTOMS

TCLP Volatiles Analysis, ppm

Parameter	benzene	CCl4	Cibenz	CHCl3	1,4-DCIB	1,2-DCA	1,1-DCE	MEK	PCE	TCE	VChloride	
Reg. Limit	0.5	0.5	100	6	7.5	0.5	0.7	200	0.7	0.5	0.2	
LAB	SITE											
SK-94	SD-S	<50	64.4	<50	<50	<50	<50	<250	890	<50	<100	
SK-94	NY-A	<0.31	<0.31	<0.31	<0.31	<0.31	<0.31	<1.55	0.73	<0.31	<0.56	
SK-94	ID-B	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	1.2	0.3	<0.10	<0.14	
SK-95	FA	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.39	0.1	<0.14	
SK-95	DE	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<0.10	<0.10	<0.14	
SK-95	SC-G	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	0.83	0.25	<0.14	<0.20	
SK-95	NY-N	<0.42	<0.42	<0.42	<0.42	0.54	<0.42	<2.08	6.37	<0.42	<0.58	
SK-95	NE-GI	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	1.2	0.26	<0.10	<0.14	
SK-95	NE-O	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	0.68	0.32	0.15	<0.140	
SK-95	NY-L	<100	<100	<100	<100	<100	<100	<500	352	<100	<140	
SK-95	BI	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.41	0.17	<0.14	
SK-95	CO-E	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.27	<0.10	<0.14	
SK-95	DO	<0.10	<0.10	<0.10	0.3	<0.10	<0.10	<0.50	0.11	<0.10	<0.14	
SK-95	ID-B	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.79	<0.10	<0.14	
MAX		0	64.4	0	0.3	0.54	0	0	1.2	890	0.17	0
MIN		0	64.4	0	0.3	0.54	0	0	0.68	0.11	0.1	0

AQUEOUS BRAKE CLEANER

Physical Properties and TCLP Metals Analysis, ppm

Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag	
Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5	
LAB	SITE											
SK-95	GA-C	9.08	0.993	126	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	GA-G	8.94	0.993	>200	<4.0	1.79	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	NJ-N	9.00	0.991	>200	<4.0	1.19	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	NJ-B	9.21	1.00	>200	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	ID-B	9.24	1.007	>200	<5.0	<20	<1.0	<2.0	<5.0	<0.04	<0.45	<1.0
SK-95	NY-S	8.74	1.01	>200	<5.0	<20	<1.0	<2.0	<5.0	<0.04	<0.45	<1.0
SK-95	NY-W	8.90	0.99	>200	<4.0	1.36	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	NY-A	8.93	1.002	>200	<5.0	<20	<1.0	<2.0	<5.0	<0.04	<0.45	<1.0
SK-95	NJ-S	9.12	0.996	>200	<4.0	2.07	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	NY-T	7.56	0.995	>200	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	NY-C	9.01	0.996	>200	<4.0	1.36	<u>1.73</u>	<2.0	<4.0	<0.04	<0.45	<2.0
SK-95	NY-L	9.01	1.01	>200	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	GA-m	9.08	0.099	126	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
SK-95	NY-N	9.28	0.986	>200	<4.0	<1.0	<1.0	<2.0	<4.0	<0.04	<0.45	<2.0
SK-95	GA-M	8.91	0.991	>200	<4.0	<1.0	<1.0	<2.0	<3.5	<0.04	<0.45	<1.5
MAX		9.28	1.016	126	0	4.66	5.92	0	5.85	0.02	0	0
MIN		7.52	0.099	104	0	0.21	0.96	0	5.85	0.02	0	0

*RESAMPLE CONFIRMS FLASH POINT RESULT >200.

AQUEOUS BRAKE CLEANER

TCLP Semi Volatiles Analysis, ppm

Parameter	cresol	2,4-DNT	Cl6-benz	Cl6-13-but	Cl6-eth	nitrobenz	Cl5-phenol	pyridine	2,4,5-TCP	2,4,6-TCP	
Reg. Limit	200	0.13	0.13	0.5	3	2	100	5	400	2	
LAB	SITE										
SK-95	GA-C	<1.9	<1.4	<2.8	<3.8	<3.2	<1.2	<18	<1.8	<0.90	<1.2
SK-95	GA-G	<190	<144	<272	<384	<312	<124	<1794	<180	<90	<118
SK-95	NJ-N	<0.95	<0.72	<1.4	<1.9	<1.6	<0.62	<9.00	<0.90	<0.45	<0.59
SK-95	NJ-B	<1.90	<1.40	<2.80	<3.80	<3.20	<1.20	<18.00	<1.80	<0.90	<1.20
SK-95	ID-B	<1.0	<1.0	<2.0	<3.0	<3.0	<2.0	<0.60	<2.0	<2.0	<2.0
SK-95	NY-S	<1.4	<1.2	<1.7	<3.0	<3.0	<1.6	<0.60	<1.8	<1.8	<1.9
SK-95	NY-W	<0.700	<0.580	<0.850	<1.50	<1.50	<0.800	<0.300	<0.900	<0.900	<0.950
SK-95	NY-A	<1.4	<1.2	<1.7	<3.0	<3.0	<1.6	<0.6	<1.8	<1.8	<1.9
SK-95	NJ-S	<1.9	<1.4	<2.8	<3.8	<3.2	<1.2	<18	<1.8	<0.90	<1.2
SK-95	NY-T	<0.280	<0.230	<0.340	<0.590	<0.600	<0.320	<0.120	<0.360	<0.360	<0.380
SK-95	NY-C	<0.70	<0.58	<0.85	<1.5	<1.5	<5.6	<0.30	<0.90	<0.90	<0.95
SK-95	NY-L	<1.4	<1.2	<1.7	<3.0	<3.0	<1.6	<0.60	<1.8	<1.8	<1.9
SK-95	GA-m	<1.9	<1.4	<2.8	<3.8	<3.2	<1.2	<18	<1.8	<0.90	<1.2
SK-95	NY-N	<2.8	<2.3	<3.4	<5.9	<6.0	<3.2	<1.2	<3.6	<3.6	<3.8
SK-95	GA-M	<0.070	<0.058	<0.085	<0.150	<0.150	<0.080	<0.030	<0.090	<0.090	<0.095
	MAX	0	0	0	0	0	0	0	0.23	0	0
	MIN	0	0	0	0	0	0	0	0.23	0	0

AQUEOUS RAKE CLEANER

TCLP Volatiles Analysis, ppm

Parameter	benzene	CCI4	Cibenz	CHCl3	1,4-DCIB	1,2-DCA	1,1-DCE	MEK	PCE	TCE	VChloride
Reg. Limit	0.5	0.5	100	6	7.5	0.5	0.7	200	0.7	0.5	0.2
LAB	SITE										
SK-95	GA-C	<25	<25	<25	<25	<25	<25	<125	<u>178</u>	<25	<35
SK-95	GA-G	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	<u>59</u>	<u>17</u>	<1.4
SK-95	NJ-N	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.42	<0.10	<0.14
SK-95	NJ-B	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	<1.0	<1.0	<1.4
SK-95	ID-B	<100	<100	<100	<100	<100	<100	<500	<u>952</u>	<100	<140
SK-95	NY-S	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0
SK-95	NY-W	<10	<10	<10	<10	<10	<10	<50	<u>76.2</u>	<10	<14
SK-95	NY-A	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	<u>1.6</u>	<1.0	<1.0
SK-95	NJ-S	<100	<100	<100	<100	<100	<100	<500	<u>989</u>	<100	<140
SK-95	NY-T	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	<u>12.2</u>	<1.0	<1.4
SK-95	NY-C	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>9.6</u>	<0.10	<0.14
SK-95	NY-L	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>30.2</u>	<u>2.6</u>	<0.14
SK-95	GA-m	<25	<25	<25	<25	<25	<25	<125	<u>178</u>	<25	<35
SK-95	NY-N	0.15	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<u>7.6</u>	<0.10	<0.14
SK-95	GA-M	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	0.27	<0.10	<0.14
MAX		12	0	0	0	0	0	301	5020	20.5	0
MIN		0.15	0	0	0	0	0	0.91	0.11	0.25	0

ATTACHMENT B

SECURITY MEASURES

SECURITY MEASURES

The facility is secured with a six-foot high chain link fence topped by three strands of barbed wire inside a coil of barbed wire. All access gates are locked when the facility is unoccupied. Warning signs in English and Spanish are placed at the entrances stating "Danger - Unauthorized Personnel Keep Out", and are visible from twenty-five feet. An electronic entrance gate is located at the front of the facility which can automatically be opened and closed to allow trucks to enter and exit. In addition, outdoor lights are on sensing devices that activate at low light conditions.

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

The tanks are inaccessible in that material can not be added to or removed from them without activating the pumps, the controls for which are outside the return and fill station. The pumps are not activated unless solvent product or waste is being added to or removed from the tanks by Safety-Kleen personnel. The container storage area is also locked unless occupied by Safety-Kleen personnel. As a result the tanks and container storage area are inaccessible except by Safety-Kleen personnel. In addition, warning signs are posted on the return and fill station. These warning signs are posted in both English and Spanish.

ATTACHMENT C

INSPECTION PROCEDURES

INSPECTION PROCEDURES

The Resource Recovery Branch (i.e., service center) Manager or his designate is responsible for carrying out and documenting the facility inspection (Examples of these forms are in Attachment E) on a daily basis. He must note any repairs that are needed and assure that they are completed. If he can not carry out the repairs himself, he must notify the Technical Services Department at Safety-Kleen's corporate headquarters and request assistance. Completion of repairs must also be noted on the Facility Inspection Record.

The Environment, Health & Safety Manager (EHS Manager) or Regional Sales Manager must review the Facility Inspection Record with the Resource Recovery Branch Manager at least three times per year to insure that they are properly completed and that any necessary repairs have been effected.

The facility inspection includes the following:

- a. Tank inspections--At a minimum, the tanks holding the solvent product and spent solvent are inspected daily. The inspections include checks of the high level alarm and of the volume held in the tank and checks of the leak detection system for any releases. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. When the tank used to store spent solvent is 85% full, a pickup must be scheduled with the Solvent Control Department in Safety-Kleen's corporate headquarters. The solvent must not exceed 95% of the tank volume at any time.

A liquid sensing leak detector is between the two walls (secondary containment) of the tanks and the recorder chart must be checked weekly. Any leaks detected which may indicate damage to the secondary containment must be noted and repairs initiated.

- b. Solvent dispensing equipment--The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks or leaks) and proper functioning on a daily basis. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked daily for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired.
- c. Drum storage areas--The drum storage area is inspected daily and the number and condition of the drums noted. The total volume of the spent solvent held in the drum storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect drums must be placed in a drum of adequate integrity. Finally, the drums must be properly labeled and marked in accordance with U.S. DOT and New Mexico hazardous waste regulations. The secondary containment system must

be inspected for deterioration or failure. If cracks or leaks are detected, they must be repaired immediately.

- d. Route vehicles--Each route vehicle must be inspected daily to insure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment must be on board: sorbants, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses. Any missing equipment must be replaced.
- e. Dumpsters/Drum Washers--The two wet dumpsters/drum washers (in the return and fill station) must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster. The dry (trash) dumpster must be inspected to insure that no liquids are being placed in it.
- f. Safety equipment--The fire extinguishers must be checked weekly to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed weekly and the first aid kit and sorbents must be inspected weekly for adequate content and accessibility.
- g. Security--The operation of each outside light, gate and lock must be checked daily. In addition, the fence must be inspected for deterioration on a weekly basis.

ATTACHMENT D

PERSONNEL TRAINING

PERSONNEL TRAINING
ABSTRACT

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems.

TIME OF TRAINING

Job Title	Prior to Starting Work	On The Job	Annually or when Regulations or Procedures Change
Resource Recovery Branch Manager	X	X	X
Branch Secretary	X	X	X
Branch Sales Manager	X	X	X
Sales Representative	X	X	X
Material Handler	X	X	X

PERSONNEL TRAINING

D.1 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to his job assignment. All facility employees except for Branch Secretaries and Sales Managers must complete an introductory training program before starting their jobs, with annual review and update thereafter. Attachment D.1 contains information on service center personnel and trainers, job descriptions, training outlines and training record forms. All employees at the facility have had training that satisfies the requirements of Pt. V, § 264.16. All of these people provide input to Safety-Kleen training program and any of them may participate in the actual training. The EHS Manager directly assists with the training new Resource Recovery Branch Managers. The Resource Recovery Branch Manager, in turn, trains his employees. An employee may not work in an unsupervised position until he or she has received proper training as outlined in Attachment D.2.

D.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

The Corporate Training and Environmental, Health and Safety Department are responsible for developing, implementing and presenting the training program to the Resource Recovery Branch Manager. Environmental compliance and training of facility employees is the responsibility of the Resource Recovery Branch Manager. The Corporate Training and Environmental Health and Safety Departments ensure that the Resource Recovery Branch Manager is trained and that he in turn trains facility personnel including annual and introductory training of Sales Managers, sales representatives, branch secretaries and Material Handlers. Job descriptions are contained in Attachment D.1.

D.2.1 Resource Recovery Branch Manager

The Resource Recovery Branch Manager is ultimately responsible for the operations at the service center. The sales representatives, secretary and Material Handler report to the Resource Recovery Branch Manager and he, in turn, must provide the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the Resource Recovery Branch Manager must:

- a. keep the service center clean and orderly;
- b. execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;
- c. know the potential hazards of the material and wastes handled on site;
- d. identify potential spill and fire sources and be able to execute the contingency plan;
- e. inform all employees of their environmental responsibilities;

- f. act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office; and
- g. maintain all environmental records (such as manifests, training records and spill reports) on file.

The Resource Recovery Branch Manager is trained (see section D.3.1) sufficiently that he is able to perform as a trainer himself, for his employees.

D.2.2 Environment, Health and Safety Department

Safety-Kleen's Environment, Health and Safety (EHS) Department operates out of the corporate office in Elgin, Illinois, with EHS Managers located in key locations across the country. The EHS Department must:

- a. provide a training program which addresses the requirements of environmental regulations and corporate policy;
- b. notify the proper authorities, oversee remedial actions and submit a written report to the state after an emergency situation has occurred;
- c. assure that environmental permits are submitted and updated as required; and
- d. manage any environmental compliance issues which exceed the resources available at the service center level.
- e. participate in training new Resource Recovery Branch Managers.

D.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training is accomplished using both classroom and on-the-job methods. Environmental training for Resource Recovery Branch Managers comes from both the EHS Department and EHS Managers. This training is sufficient enough to allow the Resource Recovery Branch Manager to in turn train his facility employees.

All facility employees are trained prior to starting or as soon as he or she begins working (depending on his or her position) and annually thereafter. An example of introductory and annual training program outlines for all facility personnel are provided in Attachment D.2. In addition, new Resource Recovery Branch Managers receive more intense training as designated by the Corporate Training and EHS Department.

D.3.1 Training of New Resource Recovery Branch Managers

New managers are trained for several weeks before they begin their new positions. This training is both in situ and classroom modes. While being trained at a designated "training facility", a new manager reviews all environmental records and learns the record keeping requirements. These records include: Waste Analysis Profiles manifests, personnel records, training records, facility inspection records, and spill reports. An employee may not work in an

unsupervised position until he or she has received the training per the example outlined in Attachment D.2.

The training culminates in about four weeks of training at his new facility, at least one day of which is devoted to environmental training with his EHS Manager. This training consists of an introduction to environmental law and a review of the Part A and Part B, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. An Example of the training is outlined in Attachment D.2.

Additional time is spent reviewing past environmental compliance at the Resource Recovery Branch Manager's facility and regulations unique to his state are discussed as well.

D.3.2 Training of New Branch Secretaries

Branch secretaries are trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the Resource Recovery Branch Manager and is done within six months of starting. It includes the items listed in the Example Introductory and Annual Training Topics for Branch Employees (Attachment D.2) which are explained in company-produced videotape presentations on emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues. In addition, the contingency plan must be reviewed with the Resource Recovery Branch Manager within the first two weeks of the secretary starting work.

D.3.3 Training of Sales Manager

A Branch Sales Manager is a middle management position created to supervise the sales force within a specific line of services. The Sales Manager position will be particular to a specific line of Safety-Kleen business and will be filled according to the needs of the facility. The primary goal of this position is to direct and assist the Resource Recovery Branch Manager in attaining sales goals in a specific line of business which Safety-Kleen offers. The Sales Manager supervises the sales aspect of the sales representative position. Though most training for this position is within the area of sales the Sales Manager also receives the training in the Example Introductory and Annual Training Topics for Facility Employees located in Attachment D.2. A Sales Manager may also be trained as the designate for performing facility inspection. Additional training in the form of slide/tape and /or video presentations and a review of the Contingency Plan with the Resource Recovery Branch Manager is required. A job description for this position can be found in Attachment D.1.

D.3.4 Training of New Sales Representatives

New sales representatives are trained in situ for two weeks during which they are introduced to manifests, facility inspection records and training records. A sales representative may also be trained as the designate for performing the facility inspection. Additional training is in the form of videotape presentations and a review of the contingency plan. The contingency plan must be reviewed with the Resource Recovery Branch Manager before the sales representative formally begins his new position and annually thereafter. All items listed in the

Example Introductory and Annual Topics Training for Branch Employees (Attachment D.2) must be explained within six months of starting.

D.3.5 Training of New Material Handlers

A Material Handler is trained to maintain the service center and assist the other branch employees in their tasks. He may be a designate for the facility inspection and must be trained by the Resource Recovery Branch Manager as such. Within two weeks of the Material Handler's starting, the Resource Recovery Branch Manager must review the contingency plan with him, and within six months he must review the items listed in the Example Introductory and Annual Training Topics for Branch Employees (Attachment D.2).

D.3.6 Annual Training

On an annual basis, employees are trained using a program prepared and updated annually by the EHS Department. The EHS Manager must insure that the program has been executed. The annual training includes updates on environmental regulations, an in-depth review of the contingency plan and a review of RCRA inspection criteria.

All service center employees must annually review the items listed in the Introductory and Annual Topics for Branch Employees. This review is in the form of slide/tape and/or videotapes and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental regulations are issued by the EHS Department and must be read and discussed by all branch personnel.

D.4 TRAINING RECORDS

All training is documented. The records must be kept on file at the facility until closure. Employees may not work in unsupervised positions until the contingency plan has been reviewed and they understand emergency response procedures.

Attachment D.1

Example Employee Job Descriptions

REGIONAL MANAGER

JOB DESCRIPTION

The Regional Manager has overall responsibility for the branch operations within a certain geographic area defined by the Corporate Marketing Department. He is responsible for the proper operations and profitability of several (six to eight) service centers in his region.

REPORTS TO:

Divisional Vice President of Sales

QUALIFICATION:

Minimum high school graduate with Safety-Kleen management experience.

PRINCIPAL RESPONSIBILITIES:

1. Plan, direct, and monitor activities of Resource Recovery Branch Managers.
2. Training of Resource Recovery Branch Managers and branch secretaries.
3. Assist Resource Recovery Branch Managers with their administrative and sales activities, when necessary.
4. Monitor sales and inventory figures and report them to the corporate offices.
5. Insure that the facility and equipment are inspected regularly, and necessary repairs or remedial actions are implemented.
6. Represent Safety-Kleen Corp. in local community affairs and public relation activities.
7. Coordinate with corporate Technical Services and Environmental Engineering Departments and implement necessary actions or plans for regulatory compliance.

RESOURCE RECOVERY BRANCH MANAGER

JOB DESCRIPTION

The Resource Recovery Branch Manager has overall responsibility for the facility operations and maintenance, and directs sales activities within a certain geographic area defined by the Corporate Marketing Department. He is responsible for the proper operations and profitability of the service center.

REPORTS TO:

Regional Manager of Sales

QUALIFICATION:

Minimum high school graduate with Safety-Kleen sales experience.

PRINCIPAL RESPONSIBILITIES:

1. Plan, direct, and monitor activities of Sales Representatives.
2. Training of sales representatives and other branch personnel.
3. Assist or accompany sales representatives during their sales activities, when necessary.
4. Tabulate daily sales and inventory figures and report them to the corporate offices.
5. Maintain adequate inventory of solvents, allied products, and equipment.
6. Carry out corporate policies and standards regarding facilities, equipment operation and maintenance.
7. Inspect facility and equipment regularly, and implement necessary repairs or initiate remedial actions.
8. Represent Safety-Kleen Corp. in local community affairs and public relation activities.
9. Coordinate with corporate Technical Services and Environmental Engineering Departments and implement necessary actions or plans for regulatory compliance.

Safety-Kleen Corp.®

Field Sales and Service Position Description

Position Title:

PAINT REFINISHING SALES AND SERVICE REPRESENTATIVE

Division:

PAINT REFINISHING SERVICES

Organizational Relationship:

Reports directly to the Resource Recovery Branch Manager or other management levels as indicated by attached Corporate organizational chart.

Qualifications:

High school graduate (minimum)

Able to pass D.O.T Certification and meet other hiring requirements.

Possess, or be able to possess, a valid commercial driver's license.

Position Overview:

The Safety-Kleen Sales and Service Representative is responsible for all sales and service activities within an assigned geographic area. This includes servicing established accounts and generating new accounts. Duties include travel by truck to customer locations, demonstrating and servicing spray cleaning and spot blasting equipment or engaging in drum removal services, and selling by demonstration a complete line of automotive refinishing supplies. Servicing equipment includes transferring barrels weighing 75 to 96 pounds from the truck to the customer's location, cleaning and checking to assure proper working order of the equipment (replacing parts if necessary). The drum of used solvent is then returned to the truck and branch accompanied by the properly completed paperwork. Both the above machine service and drum removal service include assuring only approved waste is removed and that all applicable labels and documentation are accurate.

Typical Daily Duties:

1. Perform safety check each day on assigned route truck and replenish products on the truck before beginning daily activity.
2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
3. Exchange used solvents with fresh solvent and replenish the inventory of Safety-Kleen's products for existing customers.
4. Make minor repairs of Safety-Kleen's spray cleaners and spot blasters or lease new equipment to the customer.
5. Accurately prepare the necessary paper-work for each service (including all government related documents, labels, or vehicle placards), and bill or credit the customer, as necessary.
6. At the end of each day, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the supervisor or clerical staff can tabulate the daily figures and forward them to the Corporate office. The offloading of solvents, machines, wastes, and pads, although in some cases this is performed by a warehouseman, is the responsibility of the sales rep. This offloading includes the proper placement in specified areas of the warehouse or flammable drum storage areas.

Safety-Kleen Corp.®

Field Sales and Service Position Description

Position Title:

DRY CLEANING SALES AND SERVICE REPRESENTATIVE

Division:

DRY CLEANER SERVICES

Organizational Relationship:

Reports directly to the Resource Recovery Branch Manager or other management levels as indicated by attached Corporate organizational chart.

Qualifications:

High school graduate (minimum).

Able to pass D.O.T Certification and meet other hiring requirements.

Possess or be able to possess a valid commercial drivers license.

Position Overview:

The Safety-Kleen Sales and Service Representative is responsible for all sales and service activities within an assigned geographic area. This includes servicing established accounts and generating new accounts. Duties include travel by truck to customer locations, selling a line of allied products, and engaging in a drum removal service. Drum removal service includes transferring barrels of new product weighing 75 to 250 pounds from the truck to the customer's location, and transferring hazardous waste drums weighing 75 to 250 pounds to the truck and eventually back to the branch accompanied by the properly completed paperwork. Drum removal service includes assuring only approved waste is removed, and that all applicable labels and documentation are accurate.

A line of cleaning products is also available and should be demonstrated and sold at each customer location. The Sales Rep is expected to be knowledgeable and in

Typical Daily Duties:

1. Perform safety check each day on assigned route truck and replenish products on the truck before beginning daily activity.
2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
3. Remove used solvents and filters and replenish the inventory of Safety-Kleen's products for existing customers.
4. Accurately prepare the necessary paper-work for each service (including all government related documents, labels, or vehicle placards), and bill or credit the customer, as necessary.
5. At the end of each day, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the supervisor or clerical staff can tabulate the daily figures and forward them to the Corporate office. Offloading of drums and filters, although in some cases this is performed by a warehouseman, is the responsibility of the sales rep. This offloading includes the proper placement in specified areas of the warehouse or drum storage areas.

Safety-Kleen Corp.®

Field Sales and Service Position Description

Position Title:

INDUSTRIAL SALES AND SERVICE REPRESENTATIVE

Division:

INDUSTRIAL SERVICES

Organizational Relationship:

Reports directly to the Branch Industrial Manager and indirectly to the Resource Recovery Branch Manager or other management levels as indicated by attached Corporate organizational chart.

Qualifications:

High school graduate (minimum).

Able to pass D.O.T. Certification and meet other hiring requirements.

Possess, or be able to possess, a valid commercial driver's license.

Position Overview:

The Safety-Kleen Sales and Service Representative is responsible for specific sales and service activities within an assigned geographic area. This includes servicing established accounts and generating new accounts or leads for the BIM. Duties include travel by truck to customer locations, demonstrating and servicing parts cleaning equipment or engaging in drum removal services which may involve drums weighing up to 800 lbs. Servicing equipment includes transferring barrels weighing 75 to 140 pounds to and from the truck to the customer's location, cleaning and lifting a 50-72 pound sink from the drum at this location and placing it on the clean barrel, and checking to ensure proper working order of the sink (replacing parts if necessary). Some equipment requires slightly different cleaning procedures. The drum of used solvent is then returned to the truck and branch accompanied by the properly completed paperwork. Both the above machine service and drum removal

- ⇒ Helping maintain service center cleanliness and operating efficiency when called upon to do so.
- ⇒ Preventing unnecessary damage or waste of supplies or equipment.
- ⇒ Performing special duties as assigned by supervisors within the limits of corporate policy.

Typical Daily Duties:

1. Perform safety check each day on assigned route truck and replenish products on the truck before beginning daily activity.
2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
3. Exchange used solvents with fresh solvent and replenish the inventory of Safety-Kleen's products for existing customers.
4. Make minor repairs on Safety-Kleen's parts washer equipment at customer locations (fusible link, light assy, lid, pump, etc.) or replace with new equipment.
5. Accurately prepare the necessary paper work for each service (including all government related documents, labels, or vehicle placards), and bill or credit the customer, as necessary.
6. At the end of each day, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the supervisor or clerical staff can tabulate the daily figures and forward them to the Corporate office. Offloading of solvents and machines, although in some cases this is performed by a warehouseman, is the responsibility of the sales rep. This offloading includes the proper placement in specified areas of the warehouse or drum storage areas.

Policy Date Draft
Prepared by J. Pelletier
Approved by _____

Safety-Kleen Corp.®

Field Sales and Service Position Description

Position Title:

AUTOMOTIVE SALES AND SERVICE REPRESENTATIVE

Division:

AUTOMOTIVE / RETAIL SERVICES

Organizational Relationship:

Reports directly to the Branch Automotive Manager and indirectly to the Resource Recovery Branch Manager or other management levels as indicated by attached Corporate organizational chart.

Qualifications:

High school graduate (minimum)

Able to pass D.O.T. Certification and meet other hiring requirements.

Position Overview:

The Safety-Kleen Sales and Service Representative is responsible for all sales and service activities within an assigned geographic area. This includes servicing established accounts and generating new accounts. Duties include travel by truck to customer locations, demonstrating and servicing parts cleaning equipment and engaging in drum removal services. Servicing equipment includes transferring barrels weighing 75 to 140 pounds from the truck to the customer's location, cleaning and lifting a 50-72 pound sink from the drum at this location and placing it on the clean barrel, and checking to assure proper working order of the sink (replacing parts if necessary). The drum of used solvent is then returned to the truck and branch accompanied by the properly completed paperwork. Both the above machine service and drum removal service includes assuring only approved waste is removed and that all applicable labels and documentation are accurate.

- ⇒ Performing special duties as assigned by supervisors within the limits of Corporate policy.

Typical Daily Duties:

1. Maintain assigned route truck and replenish products on the truck before beginning daily activity.
2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
3. Exchange used solvents with fresh solvent and replenish the inventory of Safety-Kleen's products for existing customers.
4. Make minor repairs to Safety-Kleen's parts washer equipment, or lease new equipment to the customer.
5. Accurately prepare the necessary paper work for each service (including all government related documents), and bill or credit the customer, as necessary.
6. At the end of each day, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the supervisor or clerical staff can tabulate the daily figures and forward them to the Corporate office. Offloading of solvents and machines, although in some cases this is performed by a warehouseman, is the responsibility of the sales rep. This offloading includes the proper placement in specified areas of the warehouse or drum storage areas.



BRANCH MIDDLE MANAGEMENT POSITION DESCRIPTION

Position Title:

BRANCH INDUSTRIAL MANAGER

Organizational Relationship:

Reports directly to the Resource Recovery Branch Manager. All Industrial Sales Representatives within assigned territories report directly to the BIM.

Qualifications:

High School graduate (minimum) who has demonstrated above average Safety-Kleen sales ability and performance. Applicant should exhibit leadership abilities and be self-motivated, and pass Company testing. Excellent communication and presentation skills are mandatory.

Primary Focus:

- Assures customer satisfaction and achieves assigned sales goals as related to industrial services in assigned territory. This task is primarily accomplished through personal direct sales effort.

Secondary Focus:

- Trains, motivates and manages the industrial sales staff within the assigned territory.

Essential Job Functions and Responsibilities

- Achieves sales objectives as assigned.
- Understands and adheres to all environmental laws and regulations, the Corporate Ethics Policy, and all other Corporate policies and procedures.
- Manage all personnel within the assigned territories by daily/weekly communication in regards to branch standards, goals and objectives.
- Reviews weekly and period sales production summaries.
- Ensures that customers have the right kind of equipment which is properly labeled, on the appropriate service interval and priced properly. Ensures the retention and satisfaction of existing customers.
- Conducts performance reviews with assigned personnel.

Effective 2/1/93

Safety-Kleen Corp.®

Policy Date Draft
Prepared by J. Pelletier
C. Sprague
Approved by _____

Branch Secretary Position Description

Position Title:

BRANCH SECRETARY, LEVEL 1

Division:

FACILITY MANAGEMENT

Organizational Relationship:

Branches With BFMs: Reports directly to the BFM.

Branches Without BFMs: Reports directly to the RRBM.

Qualifications:

Minimum of a High School diploma or equivalent.

Some Computer Training preferred

Position Overview:

This position involves limited independent judgement. May be a part time or temporary position. This position is entry level. This position follows the guidance of a Junior or Senior Branch Secretary and follows a procedural manual developed by the Junior or Senior Branch Secretary.

This position requires good matching ability, good typing, and filing skills. Possible data entry or computer skills are necessary in some branches. This position entails document editing and correcting sales and hazardous waste documents according to set standards.

Primary

- Files Preprints, Manifests and other sales or hazardous waste documents.
- Accurately transfers waste information form documents to Facility Operations Log.
- Sorts mail.
- Maintains customer files.
- Prepares correspondences with customer and corporate office.
- Processes previous day's work for automotive line of business.
- Makes 20 week entries from sales documents.

Secondary

- Selects supplies to be purchased and submits for approval (if designated).
- Keeps assigned work area neat and tidy.
- Tabulates and delivers bank deposit.
- Completes special projects for BFM and/or RRBM.
- Answers phone.
- Makes collection calls according to procedures or requests.
- Runs bank and post office errands.
- Assists other secretaries.

Policy Date Draft
Prepared by J. Pelletier
C. Sprague
Approved by

Safety-Kleen Corp.®

Field Material Handler Position Description

Position Title:

MATERIAL HANDLER

Division:

FACILITY MANAGEMENT

Organizational Relationship:

Branches With BFMs: Reports directly to the BFM.

Branches Without BFMs: Reports directly to the RRBM.

Qualifications:

Minimum of a High School diploma or equivalent.

Able to pass D.O.T. certification and meet other hiring requirements.

Possess or be able to possess a valid Commercial Driver's Licence (CDL).

Position Overview:

The Material Handler receives inventory and used solvent into facility. The Material Handler empties drums into a hazardous waste storage tank, washes drums and fills the drums with clean solvent. The Material Handler unloads drums that are flammable and or corrosive and stores those wastes for pick-up. The Material Handler palletizes wastes and readies them for shipment. The Material Handler double checks Sales Representatives truck to ensure they are properly strapped.

The Material Handler also keeps the warehouse clean and free of debris. The Material Handler accounts for and cleans any stains within the facility.

Description of Duties

Primary

- Prepares hazardous materials for shipment to customer locations.
- Loads trucks with inventory according to a standard truck inventory.
- Prepares hazardous wastes for shipment off-site to another Safety-Kleen location.
- Empties hazardous waste into holding vessel.
- Washes "RCRA empty" drums in drum washer.
- Fills clean drums with solvent to be shipped to customer locations.
- Receives, checks in and stocks inventory.
- Shrink wraps palletized waste, arranging the palletized waste so that all labels are visible.
- Disassembles returned machines and prepare machines to be returned to the Distribution Center.

Secondary

- Cleans out dumpsters and drum washers.
- Continuously monitors facility to make sure that all waste is containerized and labeled.
- Checks all trucks for proper strapping and roll door is closed.
- Performs housekeeping schedule as outlined by RRBM or BFM.
- Parks or moves trucks as necessary.

Attachment D.2

Example Training Plan Outline

- G. The Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA" or "Superfund")
 - 1. Purpose
 - 2. Superfund clean-up

- III. Resource, Conservation and Recovery Act (RCRA)
 - A. Overview and Scope
 - B. Hazardous Waste Management
 - 1. Implementation
 - 2. Identification and Listing of Hazardous Waste
 - a. Listed Wastes
 - b. Characteristic Wastes
 - c. Waste Mixtures
 - 3. Generator Regulation
 - a. General requirements
 - b. Generator categories: 100-1000 kg./mo. generators
 - 4. Transporter Regulation
 - a. General requirements
 - b. Discharges of hazardous waste during transportation
 - 5. Treatment, Storage or Disposal Facility Regulation
 - a. General requirements
 - b. Interim status facilities
 - c. Permitted facilities

6. Enforcement
 - a. Inspections
 - b. Compliance Orders
 - c. Criminal Violations
 - d. Knowing Endangerment
 - e. Enforcement activity

C. New RCRA Programs

1. Leaking Underground Storage Tanks
 - a. The requirements
 - b. New Tank Ban
 - c. Notifications

IV. Facility Operation: Interim Status

- A. Part A Application
- B. Waste Analysis Plan
- C. Preparedness and Prevention Plan
- D. Contingency Plan and Emergency Procedure
- E. Training
- F. Closure
- G. Inspections
- H. Transportation Licensing

- V. Manifesting
 - A. Overview
 - B. Manifesting: Branch-Specific Instruction
- VI. Certification Examination
- VII. Sales Application of Environmental Compliance
- VIII. Adjourn

EXAMPLE TRAINING PLAN OUTLINE
FOR
BRANCH EMPLOYEES

- I. Purpose of Training and a Review of the Training Plan Outline
- II. Environmental Regulations and Customer Responsibilities
 - A. Small Quantity Generator vs. Generator
 - B. Manifesting - How to Complete and Distribute a Manifest
 - C. EPA Identification Numbers
- III. Transportation Regulations
 - A. Permits
 - B. Vehicle Inspections and Records
- IV. Waste Analysis Plan - Analyzing Incoming Shipments
- V. Preparedness and Prevention Plan
 - A. Performing and Recording a Facility Inspection
 - B. Proper Maintenance of Storage Facilities and Associated Equipment
 - C. Emergency Equipment - Availability and Use
- VI. Contingency Plan
 - A. Implementation of the Contingency Plan - Personnel and Emergency Functions
 1. Spills and Fires and Proper Response Actions
 - a. On Site Accidents
 - b. Transportation Accidents
 2. Reporting Requirements
 - a. Safety-Kleen Corp.
 - b. State Emergency Response System
 - c. National Response Center
 - B. Emergency Information

- C. Corporate Policies 600-608, 609 and 610
 - 1. Review of Material Safety Data Sheets
- D. Recordkeeping - Spill Report Telephone Log

PERMIT ATTACHMENT E

FACILITY DESCRIPTION, WASTE HANDLING,
PREPAREDNESS AND PREVENTION PROCEDURES

PREPAREDNESS AND PREVENTION PLAN
ABSTRACT

SECURITY MEASURES--The site is secured as follows:

- a. There is a chain link fence with three strands of barbed wire inside a coil of barbed wire around the facility.
- b. Warning signs are posted at all entrances.
- c. Locks are on all entrances to the warehouse and the Flammable Storage Building.
- d. Remote controls for all tank operations are inside the warehouse.
- e. There is outdoor lighting on sensing devices and automatically comes on at low light hours of the day

INSPECTION PROCEDURES: See Attachment C for a sample copy of the Facility Inspection Record and Procedure.

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

- a. Internal communications will be by voice.
- b. Telephones are available in the warehouse.
- c. Fire extinguishers are available next to exits in the warehouse and the Flammable Storage Building.
- d. Water is available from the city of Albuquerque.

E.1. DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Corp. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. The company has been operating since 1968 offering solvent collection and reclamation services for its 400,000 customers, more than 99% of whom generate less than 1000 kilograms (2200 pounds) per month. In 1989, Safety-Kleen reclaimed more than 40 million gallons of spent solvent.

Currently, Safety-Kleen offers several services, of which involve the accumulation and storage of spent solvent at 164 service centers in 46 states. These wastes are shipped from the service centers to one of seven Safety-Kleen recycle centers or to an independent reclaimer and are then returned to customers as usable product. A unique feature of this system is that Safety-Kleen retains ownership of the parts cleaning machines and the solvent. This "closed loop" system allows the Company to maintain control of the solvent except while it is in use at the customer's place of business. A description of each of these three services follows.

E.1.a. Parts Cleaner Service

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

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

Spent material is poured into the dumpster/drum washer in the return and fill station. It is then pumped into the storage tank for spent solvent. The sediment which accumulates in the bottom of the dumpster/drum washer is removed manually, drummed and stored in the return and fill station according to the satellite accumulation requirements of 40 CFR 262.34(b). Drums will be filled with sediment to no more than 2 inches from the top of the drum.

Spent aqueous parts cleaning solvents are either bulked at the service center or are poured into the dumpster/drum washer in the return and fill station.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model. The used solvent is pumped from the customer owned machine to a standard Safety-Kleen container meeting DOT specifications by a Safety-Kleen sales representative. The waste solvent is stored in the same manner as the waste solvent collected from our leased parts cleaner machines. The sales representative then refills the

customer-owned machine with Safety-Kleen solvent via a pump. The same analyses are performed on waste solvent from customer-owned machines as are done on our leased parts cleaner machines.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container meeting DOT specifications. The spent solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse.

E.1.b. Dry Cleaner Service

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

E.1.c. Paint Waste Service

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

E.2 DESCRIPTION OF THE FACILITY

The Albuquerque service center has been operating as a storage facility since March 1, 1977. The facility consists of the following structures:

- a. 2,500 square foot warehouse with offices, bathrooms, a sales representative room, and two contained areas (east and west) for drum storage;
- b. two 12,000 gallon underground storage tanks for clean and spent solvent; and
- c. a solvent return and fill station with a loading dock.
- d. one enclosed building to be used for container storage.

Descriptions of the surrounding area and of waste management practices at the service center follow. Applicable maps and facility drawings are at the end of Attachment E.

E.2.1 Regional Description

The Albuquerque, New Mexico Service Center is located in Bernalillo County about one mile northwest of Carlisle Blvd., and S.R. 40. This area is zoned for manufacturing and, to the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may be in conflict with operations at this site.

Albuquerque is bordered by the 11,000 acre Cibola National Forest to the east and the Canocito Navajo Indian Reservation to the west. The total population of Albuquerque and surrounding areas in Bernalillo, Sandoval and Valencia counties is about 350,000. The climate in this area is an arid, continental climate. Rainfall varies, but in the vicinity of the service center, average annual precipitation is 7 to 10 inches. Average snowfall is about 10 inches. The average temperature in winter is approximately 38 degrees F and 74 degrees F in summer. Winds blow from the north in winter and from the south in summer. The average annual wind speed is 9 miles per hour.

Albuquerque is located in the Rio Grande Valley, and is bordered on both sides by mesas rising about 5,000 feet. The elevation at the service center is approximately 5,100 feet. The service center is not in the 100-year flood plain.

The soil in the vicinity of the service center is the Wink Series. These deep, well drained soils are formed in unconsolidated alluvium but have been modified by colian erosion. The slopes are generally 0 to 1 percent in the area of the service center. The surface layer is a brown, fine sandy loam.

The Albuquerque Service Center receives its water from the City of Albuquerque which also maintains a sanitary sewer line on Girard Avenue. Drainage in this area is by way of a series of diversion channels. The North Diversion Channel is directly east of the service center.

No known oil or gas wells exist within one quarter mile of the site and it is not located in or near a wetland or critical habitat. No schools, parks or hospitals exist within one quarter mile of the facility.

The non-building areas of the facility are paved with asphalt, gravel or concrete as noted on the site plan in Attachment E (E.10). The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station and this area is paved with asphalt and concrete. The entrance to the facility is on Girard Avenue, which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the manufacturing activities in this area. The route vans that daily travel the routes between the service center and its customers use the two-lane approach driveway.

E.3 FACILITY DESIGN

The Albuquerque service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents which may occur. Specifications for the storage facilities, secondary containment and other equipment are at the end of Attachment E and descriptions follow.

E.3.1 Tank Storage

The 12,000 gallon storage tank is 8' in diameter and 32.5' long. It is constructed of 1/4" thick carbon steel and is double-walled. It is constructed in accordance with Underwriter's Laboratories Standard 58 and is located more than 5' from the building foundation, in accordance with NFPA requirements. A liquid-sensing leak detector is between the two walls, and must be checked daily.

The exterior of the outside tank is coated with a plastic-fiberglass mixture so that no metal is exposed and the tank is isolated from electrical currents.

A manually controlled waste-feed cut-off valve located adjacent to the wet dumpsters at the return and fill station can prevent the tank from being overfilled. The tank is equipped with an aural (siren) and visual (strobe light) high-level alarm system which will alert employees when the tank is approximately 600 gallons from being full. The pump on the tanker truck can be turned off immediately when the alarm sounds. A manual button can be used to test the alarm to insure the system is operable. The fill pipes are secondarily contained to prevent spills during loading and unloading operations.

Cathodic protection has been installed for the carbon steel/FRP-coated composite tank. A copy of the report by the independent corrosion expert who designed the cathodic protection system for the tank and supervised its installation has been provided to the state and a copy is on file at the facility.

The return and fill station is a concrete block structure with a metal roof and the secondary containment is monolithically poured concrete. The two dumpster/drum washers are tight-piped to the tank, and all piping is below ground and the joints are welded.

E.3.2 Drum Storage

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

The immersion cleaner, dry cleaning wastes, aqueous solvent and paint wastes are compatible with the drums in which they are stored; in fact, solvent is sometimes used as a rust-preventive coating for steel. Dry cleaning wastes are stored in polyethylene and steel drums, both containers meeting DOT specifications. Aqueous solvent is stored in polyethylene containers.

meeting DOT specifications. Immersion cleaner and paint waste are stored in steel drums meeting DOT specifications. The drums have been treated with fluorine gas to be resistant to dry cleaning solvents and they are all placed on pallets to facilitate shipping and storage.

Ignitable wastes in containers are stored at least fifty (50) feet from the property line in the masonry flammable building. The secondary containment trenches are constructed of coated concrete.

The H-3 Flammable Storage Building wall construction is of concrete masonry. Secondary containment is provided by epoxy sealed, reinforced concrete floors sloping toward a blind sump and collection trenches. It is painted light colors (white and beige) to reflect sunlight and provided with an exhaust fan to prevent extremely high temperatures and an accumulation of fumes. An overhead door secures the building when drums are not being added to or removed from it.

Immersion cleaner and dry cleaner waste are never opened at the branch facility except for annual recharacterization sampling. Containers in the warehouse will be palletized to facilitate storage shipping. Since none of the wastes handled by Safety-Kleen react with steel or polyethylene, compatibility is assured.

E.4 WASTE HANDLING

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

E.4.1 Waste Management Practices

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

Spent solvent from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. Spent material in containers meeting DOT specifications is poured into the dumpsters in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The sediment which accumulates in the bottom of the dumpster/drum washer is removed manually, drummed and stored in the return and fill station according to the satellite accumulation requirements of 40 CFR § 262.34(b). Drums will be filled with sediment to no more than 2 inches from the top of the drum. The return and fill station has secondary containment in the form of a 20.0' x 14.8' x 8' (1,548 gallons) concrete pan at its base. The total volume of waste and product will not exceed 10 times the secondary containment volume.

The underground tanks have been designed in accordance with UL Standard 58 and are constructed of carbon steel and are installed in accordance with NFPA standards. Double walls equipped with a leak detection alarm provide secondary containment. Two tanks with capacities of 12,000 gallons each are present; one is for clean and one is for spent solvent. Each tank is equipped with an audiovisual high level alarm.

The container storage areas in the warehouse are used only for the storage of (1) spent immersion cleaner, (2) dry cleaning wastes, and (3) spent aqueous solvent. The wastes are not mixed while on site and different wastes are segregated according to their contents. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes. All containers are stored on pallets.

The drum storage areas have secondary containment in the form of a six inch wide by four inch high steel reinforced concrete curbs with an approximately 1.75' x 3' x 11' x 7.5' (431 gallons) in the west warehouse and two collection trenches with approximately 2' x 3' x 3' x 7.5' (132 gallons) and 2' x 1.5' x 6' x 7.5' (136 gallons) for a combined collection trench capacity of 268 gallons in the East warehouse. No more than 4,310 gallons of waste will be stored in the West warehouse and no more than 2,680 gallons of waste will be stored in the East warehouse at any time.

Secondary containment in the Flammable Storage Building is provided by epoxy-coated floors that slope to three collection trenches. The three collection trenches have dimensions of approximately 1.8' x 8.9' x 2.3' (276 gallons), 1.9' x 9.8' x 2.1' (295 gallons) and 1.9' x 11.9' x 2.3' (390 gallons) for a combined collection capacity of 965 gallons. The flammable Storage Building is used for the storage of: 1) dumpster sediment, 2) paint waste, and, 3) spent solvent.

All containers used for storage of hazardous waste will meet DOT specifications.

Proper aisle spacing will be maintained and the drums will be stored no more than two high. Containers in the drum storage areas will be placed on pallets and moved with a forklift or pallet jack.

E.4.2 Manifest System

Safety-Kleen must implement the manifesting system required under 40 CFR 264.71. If the facility receives hazardous waste accompanied by a manifest, the Resource Recovery Branch Manager or his designate shall do all of the following:

- (a) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.
- (b) Note any significant discrepancies in the manifest on each copy of the manifest.
- (c) Within 30 days after the delivery, send a copy of the manifest to the generator.
- (d) Retain, at the facility, a copy of each manifest for not less than 3 years from the date of delivery. (Safety-Kleen is the TSDF as well as the transporter so only one copy is kept on file).
- (e) Return a copy of the manifest to the director or his or her designee within a period of 10 days after the end of the month in which the waste was received.

The requirements described above do not apply to hazardous waste produced by generators of more than 100 kilograms but less than 1,000 kilograms in a calendar month if both of the following requirements are met:

- (a) The waste is reclaimed under a contractual agreement pursuant to which the type and frequency of shipments are specified in the agreement and the vehicle used to transport the waste to the recycling facility and to deliver the regenerated material back to the generator is owned and operated by the reclaimer of the waste.
- (b) The generator maintains a copy of the reclamation agreement in his or her files for a period of not less than 3 years after termination or expiration of the agreement.

The facility will not receive bulk shipments of hazardous waste from a rail or water transporter.

When a shipment of hazardous waste is initiated from this facility, the Resource Recovery Branch Manager or his designate must:

- (a) Prepare a manifest before transporting the waste off-site.
- (b) Designate on the manifest one facility which is licensed to handle the waste described on the manifest. The Resource Recovery Branch Manager may also designate on the manifest one alternate facility which is licensed to handle his or her waste if an emergency prevents delivery of the waste to the primary designated facility.
- (c) Use a transporter who is properly licensed under the act or a generator-owned vehicle licensed under the act to transport the waste.
- (d) If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

Except as described in the next paragraph, the Resource Recovery Branch Manager shall use a manifest form approved by the director which contains all of the following information:

- (a) A manifest document number.
- (b) The generator's name, mailing address, telephone number, and EPA identification number.
- (c) The name and EPA identification number of each transporter.
- (d) The name, address, and EPA identification number of the designated facility and an alternate facility, if any.

- (e) The description of the waste required by regulations of the DOT in the provisions of 49 CFR 172.101, 172.202, and 172.203.
- (f) The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.
- (g) The hazardous waste number describing the waste.
- (h) The following 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 national government regulations and applicable state regulations."
- (i) Other certification statements required by the director based on requirements of the Solid Waste Disposal Act.

If the Resource Recovery Branch Manager manifests a shipment of hazardous waste out of state, and if the state to which the shipment is manifested requires the use of another manifest, then the generator shall use that manifest.

The Resource Recovery Branch Manager shall do all of the following when initiating a shipment:

- (a) Sign the manifest certification by hand.
- (b) Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest.
- (c) Retain one copy for his files.
- (d) Submit one copy to the director or his or her designee, which shall be postmarked not later than 10 days after the month in which shipment was made.
- (e) Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the Resource Recovery Branch Manager or his designate must review the manifest and check the information on the manifest for correctness. It should be noted that Safety-Kleen computer-prints most of the required information on the majority of its manifests. The employee checking the manifest must review the names, addresses, EPA and New Mexico I.D. and transporter numbers, the manifest document number and the telephone numbers listed. In addition, the hazardous material (HM) box should be checked, the waste description, DOT classification, DOT I.D. number and EPA Waste Code must be verified. The number of drums and pounds, as well as the symbols for these units must be correct and an "H" must be entered in the last

column. The generator, transporter(s) and TSD operator must all print and sign their names and enter the date the waste was shipped or received, as appropriate.

Upon discovering a significant manifest discrepancy, the Resource Recovery Branch Manager shall attempt to reconcile the discrepancy with the waste generator or transporter through telephone conversations or otherwise. If the discrepancy is not resolved within 15 days after receiving the waste, the Resource Recovery Branch Manager shall immediately submit, to the director and regional administrator, a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. Significant manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives, as follows:

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

E.4.3 The operating record must include:

- a. a record of hazardous waste shipments rejected by the facility including the following:
 - (1) the name of the generator and transporter,
 - (2) the manifest number,
 - (3) the date the shipment was rejected, and
 - (4) the reason for rejection;
- b. personal training records for all current personnel; and
- c. The contents of the waste storage tank, the quantity of each waste received, and the date each period of accumulation begins (i.e., the date each waste solvent pickup occurs) must also be included in the operating record.

E.4.4 A biennial report must be submitted by March 1 of each even numbered year. The biennial report shall be submitted on form 8700-13B. The report shall cover facility activities during the previous calendar year and shall include all of the following information:

- a. The EPA identification number, name, and address of the facility.
- b. The calendar year covered by the report.

- c. For off-site facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year, and, for imported shipments, the name and address of the foreign generator.
- d. A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities, this information shall be listed by EPA identification number of each generator.
- e. The method of treatment, storage, or disposal for each hazardous waste.
- f. The most recent closure cost estimate under 40 CFR 264.142.
- g. The certification signed by the owner or operator of the facility or the owner or operator's authorized representative.

E.5 PLANT OPERATIONS--POTENTIAL SPILL AND FIRE SOURCES AND CONTROL PROCEDURES

Employees must perform their duties in the safest, most efficient manner possible and the service center has been equipped to facilitate these activities. Drums of product or waste will be moved using a handcart and pallets using a forklift or pallet jack. Upon arrival at the service center, containers of spent solvent must immediately be added to the storage tank or placed in the drum storage areas. Open drums of solvent must not be left unattended. Below are descriptions of situations which can result in accidents and the precautions taken to prevent their occurrences.

E.5.1 Potential Minor Spill Sources

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

- a. Pouring of drummed solvent into the dumpster--As the contents of the drums are poured into the dumpster, solvent can splash out. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by a pan with a floor drain that empties into the storage tank. This design will contain this type of spill.
- b. Filling of drums with solvent product--A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with solvent. Leaking fittings, a damaged hose or carelessness could lead to the discharge of solvent outside of the drum. Manual emergency shut-off valves are on each hose, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.
- c. Moving of containers--When a container is moved, a potential exists for it to tip over. To minimize the potential for spillage of solvent, all containers must be maintained in an upright position and remain tightly covered while in storage or in transit.

- d. Delivery truck transfers--The cargo should be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary.

If a spill does occur, the amount of solvent in the containers is a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results will be removed manually, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

E.5.2 Potential Major Spill Source

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

- a. Overfilling of storage tanks--Both product and spent solvent tanks can be overfilled with a resulting discharge of solvent. A high level alarm and daily checks of tank volumes will prevent this type of incident.
- b. Leaking pipelines--The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

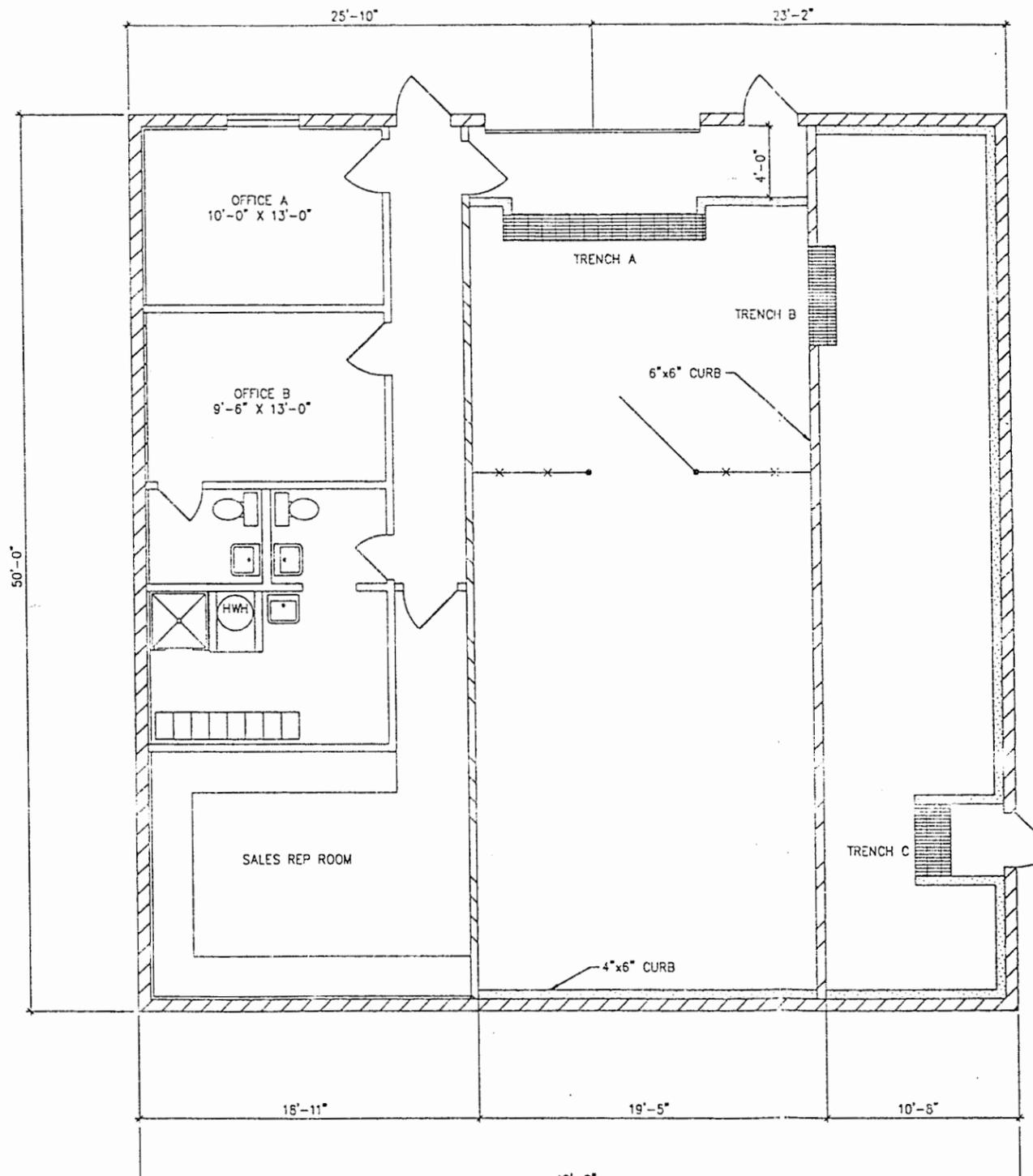
E.5.3 Potential Fire Sources

The following is a list of fire prevention and minimization measures:

- a. All wastes and products are kept away from ignitable sources--
Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., the office or locker room). The solvent handling area and the aboveground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.
- b. Ignitable wastes are handled so that they do not:
 - 1. become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The solvent waste is stored in a tank or in drums, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the drums kept at room temperature to minimize the potential for pressure build up.
 - 2. produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health--The vapor pressure of solvent is low (2 mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization will be minimal under normal working conditions.

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CAPACITY CALCULATIONS

V=Width(ft.) x Depth(ft.) x Length(ft.) x 7.48 (gal/cu.ft.)

TRENCH A
 $V = 1.71 \times 3.06 \times 11.03 \times 7.48$
 = 431.7 GALLONS

TRENCH B
 $V = 1.92 \times 1.60 \times 5.90 \times 7.48$
 = 135.5 GALLONS

TRENCH C
 $V = 2.0 \times 2.96 \times 3.0 \times 7.48$
 = 132.8 GALLONS

TOTAL CAPACITY
 $V = 431.7 + 135.5 + 132.8$
 = 700 GALLONS

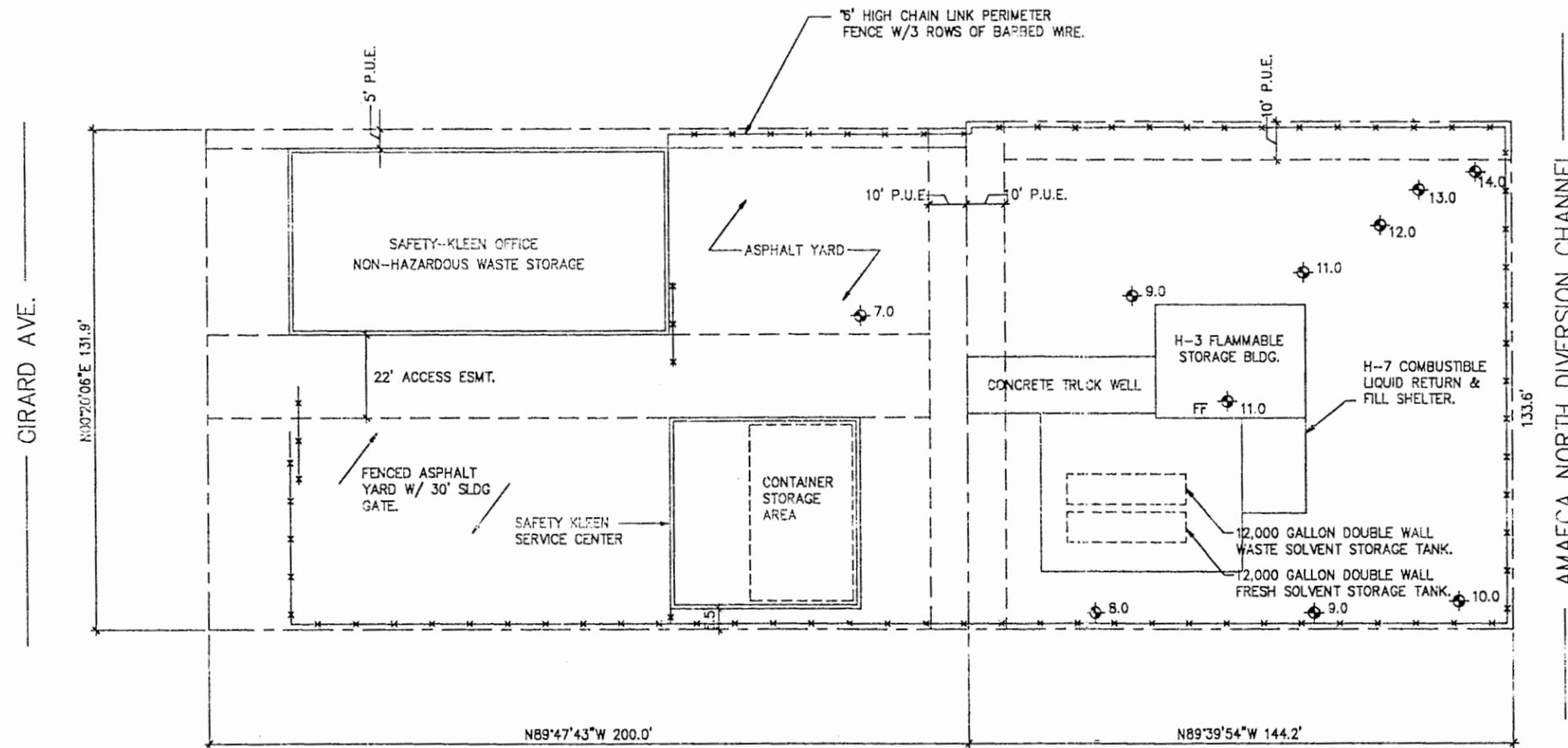


Thomas H. Wimbrow
 APR 24, 1996

										TITLE	
										FLOOR PLAN 2720 GIRARD ST	
										SAFETY-KLEEN CORP. 777 BIG TRUCK ROAD ELLENVILLE, MO 65228 PHONE 708-677-8448	
01	PERMIT MOD; CONFIRM 'AS BUILT' DIMENSIONS- TERA, INC.	AFK	TRB	THV	4/96	SCALE 1/4"=1'-0"	BY VEY	CHKD -	P.L. APPR -	DP. APPR -	DATE 2-1-96
NO.	DESCRIPTION	BY	CHK	APPR	DATE	SERVICE CENTER BRANCH AT ALBUQUERQUE, NM		STD-DWG-REV NO. 700801-7002-01			
REVISIONS											

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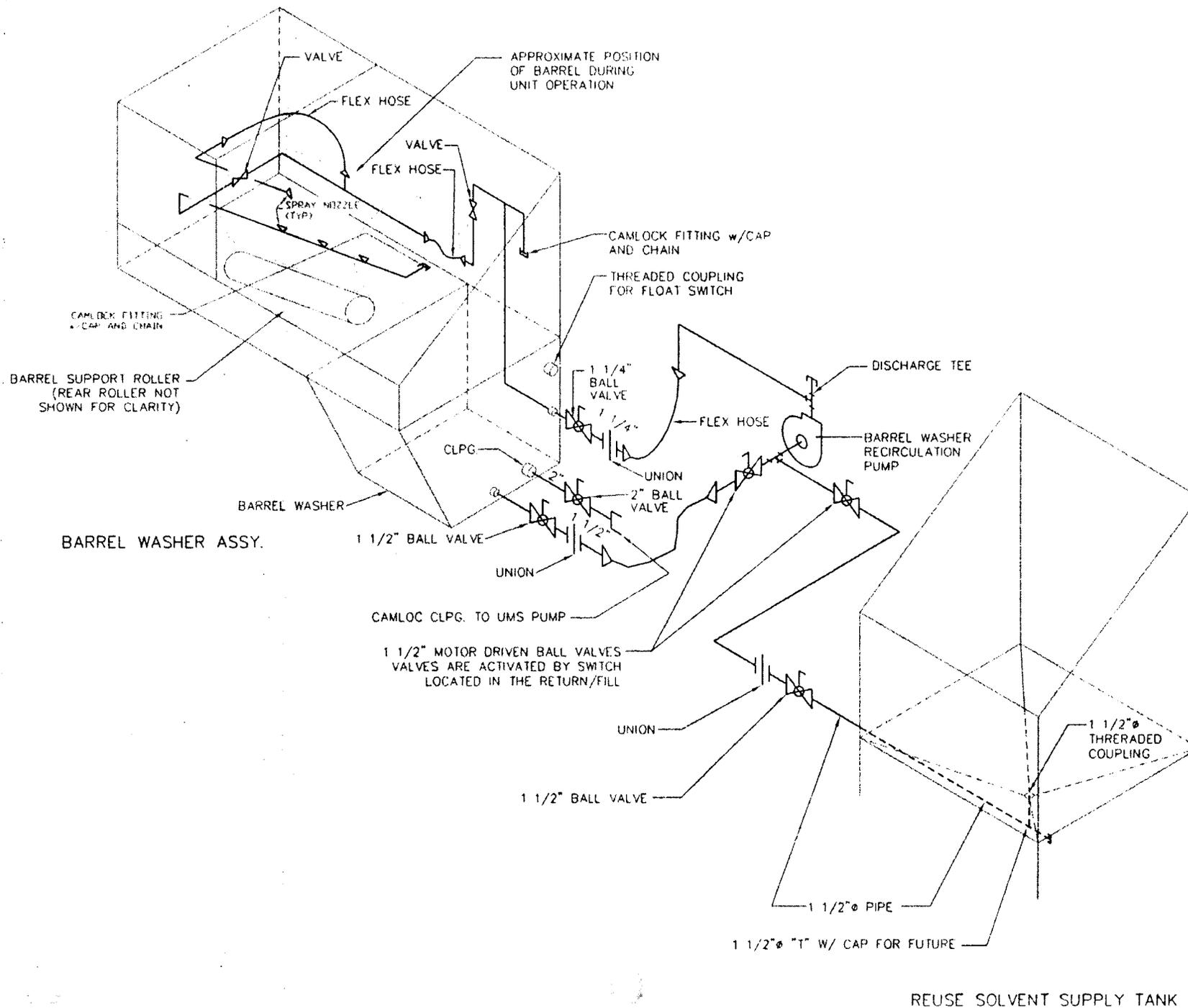


- (T) (T) - TELEPHONE
- (FE) (FE) - FIRE EXTINGUISHER (TYPICAL 10# ABC)
- (FA) (FA) - FIRST AID STATION
- (D) (D) - 'DANGER' SIGN
- (NS) (NS) - 'NO SMOKING' SIGN
- (COR) (COR) - 'CORROSIVE' SIGN
- NEW ——— EXISTING

		TITLE	
		SITE PLAN 2720 GIRARD AVE.	
		SAFETY-KLEEN CORP. 777 BIG TIGER ROAD ELLEN, ILLINOIS 62423 PHONE 708-697-8444	
01	REMOVE LOCATION OF OLD UNDERGROUND STORAGE TANKS AND SHOW NEW WAREHOUSE		11-8-95
00	REVISED SAFETY KLEEN DRAWING TO CAD AS DATE. REPLACES SAFETY KLEEN DRAWING D-10485.		1-23-91
NO.	DESCRIPTION	BY	CHK APPR DATE
REVISIONS			
		SCALE 1"=20'-0" SERVICE CENTER STANDARDS ALBUQUERQUE, N.M.	
		DP. APPR DATE 3/18/98 STD-DVG-REV NEL 700801-0001-01	

PLOT DATE: 11-8-95

BARREL WASHER / REUSE SOLVENT SUPPLY TANK PIPING ISOMETRIC



Attachment F

Contingency Plan

CONTINGENCY PLAN
ABSTRACT

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

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

EMERGENCY COORDINATOR: The Resource Recovery Branch Manager is the emergency coordinator. The alternate emergency coordinator is a trained employee designated to this position by the emergency coordinator.

EMERGENCY NOTIFICATIONS: (See on next page)

EMERGENCY INFORMATION**SAFETY-KLEEN 7-008-01**

2720 Girard Northeast
Albuquerque, New Mexico 87107
(505) 884-2277

A. Facility Emergency Coordinator

Name: Mike Crawford
Title: Resource Recovery Branch Manager
Address: 201 Country Club Dr, Rio Rancho, New Mexico 97124
Telephone: Office (505) 884-2277
Home (505) 896-1980
Pager (800) 687-6037
Mobile (505) 235-2107

Alternate Emergency Coordinator

Name: Ivan Herrera
Title: Branch Imaging Manager
Address: 608 Ridgcrest Dr. SE
Albuquerque, New Mexico 87108
Telephone: Office (505) 884-2277
Home (505) 232-2527
Mobile (505) 321-6268

B. Emergency Notification Letters

1. **Internal (24 Hour)**
Safety.Kleen Internal Notification System (800) 468-1760
2. **External:**
 - A) National Response Center (800) 424-8802
 - B) NMED Hazardous and Radioactive
Materials Bureau (505) 827-9329

C. Designated Emergency Response Authorities

1. Albuquerque Fire Dept. Station #19 4201 Menaul NE	Emergency Non-Emergency	911 (505) 243-6601
2- Albuquerque Police Dept.	Emergency Non-Emergency	911 (505) 242-COPS
3. Presbyterian Hospital	Emergency Non-Emergency	(505) 841-1111 (505) 841-1234
4. Rinchern (Clean-Up Contractor)	24-Hour	(505) 345-3655 (505) 883-4242
5. Poison Control Center		(505) 843-2551

D. Internal (Branch Paging System)

Instructions: Push INTERCOM Button (Above Conf. Button) Then:

06 Outside Speakers	13 Front Office
10 EHS Manager	15 Branch Manager
25 BIM	26 Computer Room
25 Sales Rep Room	21 Special Markets

- c. notify appropriate state or local agencies with designated response roles, if necessary.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

During an emergency, the emergency coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

F.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Environment, Health and Safety Department to report the incident. All releases, fires, and explosions necessitate the implementation of this contingency plan. Any situation that has the potential for releasing solvent or solvent vapors or causing a fire or explosion must be addressed in accordance with this plan. Should there be any questions as to whether this plan should be implemented (i.e. a problem is suspected but cannot be confirmed) the EHS and/or Technical Services Department must be contacted and assistance requested. The treatment, storage and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and
- b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

Responsibilities

Emergency coordinator determines that the facility has had a release that could harm human health or the environment, the coordinator must report those findings as

the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.

The coordinator must immediately notify the Environment, Health and Safety Department. The department will notify the New Mexico Environment Department (NMED) of any spill or release of hazardous waste within 24 hours (except for spills of one pound or less that are immediately cleaned up). The department will report to the New Mexico Environment Department (NMED) the following:

-) name and telephone number of notifier;
-) name and address of facility;
- time and type of incident (e.g., release, fire);
- name and quantity of material(s) involved, to the extent known;
- the extent of injuries, if any; and
- the possible hazards to human health, or the environment outside the facility.

The coordinator will notify the appropriate state and local authorities that the facility is in compliance with section 4.2.2 before operations are resumed in the affected area(s) of the

The facility coordinator must document the time, date, and details of any incident that require implementation of the contingency plan. Within 30 days of the incident, Safety-Kleen must submit a written report on the incident to the New Mexico Environment Department. The report will contain the information set out in Pt. V, 264.196(d)(3) and must

- address, and telephone number of the owner or operator;
- address, and telephone number of the facility;
- name, and type of incident (e.g., fire, explosion);
- name and quantity of material(s) involved;

environment,
from the incident.

of command

coordinator.

Safety Dept.

New Mexico

ties may be

human health.

controlled spill, or

or a release.

department and local
hazardous materials
storage, entrances to and
so been made to
result from fires,

overflowing, equipment failure or a fire. Spilled material which escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

- a. Assist any injured people.
- b. Stop the flow of solvent, if possible.
- c. Retain, contain or slow the flow of the solvent if it can not be stopped.
- d. If solvent escapes your containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Environment, Health and Safety Department.
- e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator shall report any incident as soon as possible to the Environment, Health and Safety Department using the 24-hour telephone number: 800/468-1760. If the Environment, Health and Safety Department does not respond within thirty minutes, the emergency coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and New Mexico HED (telephone: 505/827-9329 - 24 hour number). Otherwise, the Environment, Health and Safety Department will contact the proper authorities.

The person reporting a spill should be prepared to give his name, position, company name, address and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed.

Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Contaminated equipment resulting from remedial actions for spills must be cleaned and decontaminated. If it is a paved or metal surface, this can be done using a detergent solution. All incidents will be documented and kept on file as part of the operating record. They will be reviewed with branch personnel to prevent similar spills from occurring in the future.

All rinsates and other residues from the cleanup of spills or releases whether major or minor, will be containerized and treated as hazardous waste unless they have been analyzed and determined not to be hazardous. They may not be disposed of on the land unless they meet the relevant treatment standards specified in HWMR-5, Part VIII.

F.3.3 Fire Control Procedures

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

Vapors of solvent exposed to a spark or open flame can flash at temperatures over 105° F. A solvent fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

609 formula immersion Cleaner (which is a mixture of chlorinated solvents, cresylic acid and an alkaline solution), and dry cleaning wastes are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (about 1200° F). 699 formula immersion cleaner also is not flammable: However, incomplete combustion can generate carbon monoxide and other toxic vapors. The potential for the materials reaching a decomposition state is minimal; however, branch personnel and local authorities must be aware of the proper response, should a fire affect the drum storage areas:

- a. Isolate the hazard area and deny entry to unauthorized personnel.
- b. Stay upwind; keep out of low areas.
- c. Ventilate closed spaces before entering them.
- d. Wear positive pressure breathing apparatus and protective clothing.
- e. Evacuate a 600 foot radius area endangered by the gas.
- f. Cool the area and containers with water until well after the fire has been extinguished.

A fire in the drum storage area can best be extinguished by foam, water fog, or water spray.

Explosions may result in the spread of fire, unstable structures, and other hazardous conditions at the facility. Therefore, the site must not be re-entered until the fire department and Safety-Kleen's insurance company have determined it is safe to do so. Action must be taken to ensure that fires, explosions, or releases do not occur or reoccur. These include removing the source of the problem, repairing or remediating the source of the problem, coding areas subject to fires and explosions and replacing faulty equipment.

F.4 EVACUATION PLAN

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Girard Avenue to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

F.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

The emergency coordinator and his alternates have been trained using this contingency plan as well as in a classroom setting. They have references such as various state members at the corporate office and the Material Safety Data Sheets to help them make decisions during an emergency.

An emergency response contractor is identified on the Emergency Information Sheet (Page F-2). This contractor will provide emergency assistance during a release and/or cleanup.

F.6 POLLUTION INCIDENT HISTORY

There are no records of a pollution incident having occurred at this facility.

F.7 IMPLEMENTATION SCHEDULE

Any discrepancies or deficiencies found during the routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The Resource Recovery Branch Manager has the overall responsibility for remediating any discrepancies found during the routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

F.8 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information sheet and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

- a. the facility permittee is modified to allow new wastes to be stored or treated, or applicable regulations are revised;
- b. the list or location of emergency equipment changes;
- c. the facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
 - (1) increases the potential for fires, explosions, or releases of hazardous constituents, or

- (2) changes the response necessary in an emergency;
- d. the names, addresses, or phone numbers of emergency coordinators change;
- e. the employee assigned to each emergency task changes; or
- f. the plan fails when implemented in an emergency.

Attachment G

Closure Plan

CLOSURE PLAN
ABSTRACT

LOCATION ADDRESS: Safety-Kleen Corp. (7-008-01)
2720 Girard Avenue
Albuquerque, New Mexico 87107

U.S. EPA I.D. NO: NMD 000804294

WASTE UNITS TO UNDERGO CLOSURE:

- a. Tank Storage - one 12,000 gallon aboveground storage tank
- b. Drum Storage - an area of about 353 square feet with a storage capacity of 2,680 gallons (east) and an area of about 900 square feet with a storage capacity of 4,310 gallons (west).
- c. Return and Fill Station - The location of this waste management unit is shown in the Site Plan. It can hold 350 gallons of waste but typically operates at 30 gallons per dumpster/drum washer.
- d. Flammable Storage Building - The location of this waste management unit is shown in the Site Plan. It has a storage capacity of 9,650 gallons of waste.

The volumes shown above are the maximum amounts which will be stored at this facility.

CLOSURE PLAN

G.1 PURPOSE

The Albuquerque service center operates as a storage facility for hazardous wastes, and Safety-Kleen believes it is required that it be closed in accordance with the closure requirements of New Mexico HWMR 206.C. Closure of the facility will be carried out in accordance with the steps outlined in this plan and Attachment H contains an estimated cost for the completion of closure. Safety-Kleen will remove all hazardous wastes and residuals from the facility and will therefore eliminate the need for further maintenance and care. The expected year of closure for this facility is 2020. An outside contractor will be performing the closure clean up and sampling activities. The contractor will have worked with Safety-Kleen prior to clean up so we can be aware of their capabilities. A state licensed professional engineer will be on site periodically to certify the adequacy of the clean up activity.

G.2 UNDERGROUND TANK AND ASSOCIATED PIPING

To safely clean and decommission the aboveground storage tank:

- a. Remove the remaining material from the tank and return the material to the Recycle Center for reclamation.
- b. Provide access to the tank.
- c. Rinse, scrape and squeegee the tank interior as practical, removing all residual waste material and rinsate.
- d. Disconnect and decontaminate all appurtenant piping and pumping equipment.
- e. Remove tank and appurtenant equipment and reuse or sell as scrap.
- f. Clean and raze the diking and slab.
- g. Backfill all excavations with clean fill materials.
- h. Transport and dispose of all waste material generated during the project.

G.2.1 Removal of Waste Material and Opening of the Tank

The contents of the tank must be removed using a pump, vacuum or similar equipment and then be shipped by tanker truck to a reclaimer.

To gain access to the underground tanks, use the manway. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Prior to entering the tank, personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they must be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

G.2.2 Removal of Residual Waste and Cleaning of Tank

Before removing any residual waste from the tank, all piping and appurtenant equipment will be flushed with clean solvent followed by a detergent solution.

The method used to remove the residual waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see section G.2.1).

Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high pressure wash system using clean solvent and a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be shipped to a reclaimer. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures:

- a. Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.
- b. Supply valves must be closed and tagged and bleeder valves left open; or supply piping should be disconnected.
- c. Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "Off".
- d. On tanks where flammable vapors may be present, all sources of ignition must be removed.
- e. Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test". In all tank entering situations, an oxygen deficiency test shall also be performed prior to tank entry. Both flash test and oxygen deficiency test will be performed by the supervisor of the area in which the work is being done.
- f. Under conditions where there exists a possibility (no matter how remote) of toxic vapors being present in the tank to be entered, the supervisor will arrange to have the air tested. The results of all tests will be displayed on site.\

- g. There must be a set of wristlets or a rescue harness and sufficient rope at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.
- h. Workers should wear rescue harnesses if entering a tank with a large enough opening to easily effect a rescue. In tanks with small openings, only wristlets may be used. In cases where there are agitator shafts, drums or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the lifeline may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- i. A constant source of fresh air must be provided to insure a complete change of air every few minutes. In cases of short term entry for inspection or removal of objects, an air mask is recommended. In cases of long term entry the use of an air mover should be considered.
- j. When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.
- k. Adequate illumination must be provided and a flashlight or other battery operated light must also be on hand to provide illumination for a safe exit in the event of an electrical power failure.
- l. All electrical equipment to be used inside the tank must be in good repair and grounded.
- m. Other people working in the immediate area will be informed of the work being done, and they must inform the watcher or supervisor immediately of any unusual occurrence which makes it necessary to evacuate the tank.
- n. The Watcher or Standby Observer System must be implemented. It consists of the following:
 - (1) Workers inside a confined space must be under the constant observation of a fully instructed watcher.
 - (2) Before anyone enters the tank, the watcher will be instructed by the person in charge of the entry that an entry authorization must be obtained from the person in charge and a rescue harness or wristlets must be used on the job.
 - (3) The watcher must also know the location of the nearest telephone (with emergency numbers posted), eyewash and/or shower, fire extinguisher and oxygen inhalator. For all "hot work" inside a tank, the watcher must be instructed how to shut down the welding/burning equipment.

- (4) As long as anyone is inside the vessel, the watcher must remain in continuous contact with the worker. HE IS NOT TO LEAVE THE JOB SITE EXCEPT TO REPORT AN EMERGENCY. He does not enter the tank until help is available.
- (5) After being instructed in his responsibilities, the watcher will sign a form indicating his understanding.
- o. All welding and burning equipment must be provided with a shutoff under the control of the watcher; and the watcher must be shown how to shut off the equipment if it becomes necessary. Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
- p. For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site and standard welding and burning safety precautions will always be followed.

G.2.3 Removal of the Tank

To safely remove the tank:

- a. Disconnect all appurtenant piping.
- b. Disconnect all appurtenant pumping equipment.
- c. The tanks and piping shall be removed and disposed of at a properly permitted landfill. The final rinsate must be sampled and analyzed for volatile organic compounds to determine the cleanliness of the tank and its piping. If any volatile organic compounds are present above detection limits, the washing and rinsing must be repeated until they are no longer detectable.
- d. Sample and analyze for solvent and TCLP contaminants (except pesticides) beneath the tank farm. If contamination is indicated, it will be confirmed with an extent of contamination soil study. The soil will be over-excavated or otherwise treated to eliminate the contamination. Soil samples must be collected and analyzed after cleanup to insure decontamination has been achieved.
- e. Backfill the excavation with clean fill materials and grade to ground level.

G.3 DRUM STORAGE AREAS IN WAREHOUSE

The drum storage areas are used for the storage of drums of used immersion cleaner and dry cleaning waste and aqueous solvent. At closure, all the drums will be removed and transported to a reclaimer after proper packaging, labeling and manifesting. The contents of the drums will be reclaimed and the drums will be cleaned for reuse.

The concrete floors and spill containment trenches will be cleaned with a detergent solution and the final rinsate will be analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If any volatile organic compounds are present, the washing and rinsing must be repeated until they are no longer detectable or to levels agreed upon with the EID. If any cracks are present soil samples must be collected from beneath the cracks and analyzed for volatile organic compounds. If contamination is present, a workplan must be developed to determine the extent of contamination and proper remedial action. Any other wastes generated in the closure process will be reclaimed or properly disposed of.

G.4 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used solvents to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, the sediment in the dumpsters/drum washers will be removed and drummed, labeled, and manifested and then shipped to a reclaimer.

The dumpster/drum washers and the dock area will be thoroughly rinsed with a detergent solution. The rinsate is discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described earlier. The final rinsate must be analyzed for volatile organic compounds. If any are present above detection levels, the washing and rinsing must be repeated until they are no longer detectable. The clean dumpster/drum washers and dock structure will be reused by Safety-Kleen or scrapped.

G.5 FLAMMABLE STORAGE BUILDING

The flammable storage building is used to store containers of paint waste, dumpster sediment and spent solvent prior to shipment to a reclaimer. At closure, any residual waste will be removed from the building and shipped to a reclaimer. The building will be thoroughly cleaned with a detergent solution and the rinsate will be collected and properly disposed of. The concrete structure will be reused by Safety-Kleen or scrapped.

G.6 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Safety-Kleen will notify the Environmental Improvement Division (EID) at least 45 days in advance of known closure. Closure activities will begin within 30 days of receipt of the known last volume of hazardous waste. Within 90 days of receiving the known last volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Mexico Health and Environment Dept. may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

- a. the facility has the capacity to receive additional wastes;
- b. there is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or

- c. closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

When closure is completed, Safety-Kleen shall submit to the New Mexico Health and Environment Dept. certification, both by the operator and by an independent registered professional engineer, that the facility has been closed in accordance with the approved closure plan.

ATTACHMENT G - 1

ESTIMATED CLOSURE COSTS

2.	Torch Tank		
	Crew		
	1 Foreman	\$18.30/hr. x 8 hrs. =	146.40
	1 Laborer	\$17.00/hr. x 8 hrs. =	136.00
3.	Remove Tank		
	Crew:		
	1 Foreman	\$18.30/hr. x 2 hrs. =	36.00
	4 Laborers	\$16.80/hr. x 2 hrs. =	134.40
	1 Backhoe	\$28.97/hr. x 2 hrs. =	57.94
	Equipment	\$200 Lump Sum =	200.00
	Total Phase II		\$1,130.00

Phase III - Concrete Demolition

1.	Demolition of concrete pad	\$	750.00
2.	Removal and disposal of concrete 200 cyd at \$4.50/cyd		<u>900.00</u>
			\$1,650.00

Phase IV - Backfilling, Regrading, Soil Testing

1.	Test for soil contamination 4 samples		\$4,000.00
2.	Regrading		
	Crew:		
	1 F.E. Loader	\$27.38/hr. x 1 hr. =	27.38
	Equipment	\$200.00 lump sum =	200.00
	Backfill	10 c.y. x \$2.00 c.y =	20.00
	Total - Phase IV =		\$1,247.00

Summary of Closure Cost for 12,000-gallon tank:

Phase I =	\$10,515.00
Phase II =	1,130.00
Phase III =	1,650.00
Phase IV =	<u>4,247.00</u>

\$17,542.00

2. CLOSURE OF DRUM STORAGE AREA - Remove and return drums to a reclaimer, clean the drum storage areas, and dispose of wash water generated.

a.	2 Truck Dr.	\$17.56/hrs x 8 hrs.=	\$ 280.96
	2 Trucks	\$500 lump sum	500.00
	Hauling cost = 2 loads x 300 miles x \$1.75/mile =		1,050.00
b.	Clean drum storage area		
	Crew:		
	1 Foreman	\$18.30/hr. x 10 hrs. =	183.00
	1 Laborer	(\$17.00/hr. & \$3.00/hr. hazard pay) x 20 hours =	200.00
c.	Dispose of wash water (700 gallons @ \$0.12/gallon) =		84.00
d.	Dispose of used solvents 378 16-gallon drums x \$30/drum =		11,340.00
e.	Testing rinsate for contamination 2 samples x \$1,000.00 each		<u>2,000.00</u>
			\$15,638.00

3. CLOSURE OF RETURN AND FILL STATION - Remove, package and dispose of sediment, clean the dumpster and dock area, remove dumpster and dock structure for reuse or scrap.

a.	1 Truck @	\$250.00 lump sum each	\$ 250.00
	Hauling Cost = 300 miles x \$1.75/mile		525.00
	1 Truck Dr.	\$17.56/hr. x 8 hrs.	140.48
	Crew:		
	1 Foreman	\$18.30/hr x 8 hrs.=	146.40
	1 Laborer	(\$17.00/hr. & \$3.00/hr. hazard pay) x 8 hrs. =	160.00
b.	Clean Dumpster and Dock Areas		
	Crew:		
	1 Foreman	\$18.30/hr. x 8 hrs. =	146.40
	1 Laborer	(\$17.00/hr. & \$3.00/hr. hazard pay) x 8 hours =	160.00
	Use of high pressure water for one day =		400.00

c.	Disposal of wash water		
	(200 gallons @ \$0.70/gallon) =	140.00	
d.	Dispose of dumpster mud		
	15 55-gallon drums x \$300/drum =	4,500.00	
e.	Test rinsate for contamination		
	2 samples x \$1,000.00 each	2,000.00	
f.	Disassemble, and remove dumpsters and docks		
	Crew:		
	1 Foreman \$18.30/hr. x 8 hrs. =	146.40	
	2 Laborer \$17.00/hr. x 8 hours =	272.00	
	Equipment \$5.20hr. x 8 hrs. =	41.60	
	Total Dock Closure Cost =	\$9,028.00	

4. CLOSURE OF MASONRY SHELTER - Remove paint waste, clean shelter
[June 29, 1992]

a.	Clean masonry shelter		
	Crew:		
	1 Foreman \$18.30/hr. x 20 hrs. =	366.00	
	1 Laborer \$17.00/hr. x 3.00/hr		
	hazard pay x 20/hr =	400.00	
	Use of high pressure water for one day	400.000	
b.	Dispose of wash water		
	500 gallons x 0.12/gallon	60.00	
c.	Dispose of paint waste		
	9,650 gallons x \$2.00	19,300	
d.	Testing for contamination		
	4 samples x \$75.00 each	<u>450.00</u>	
	<u>Total Masonry Shelter Closure Cost =</u>	<u>\$20,976.00</u>	

5. PE CERTIFICATION \$1,000.00

6. TOTAL CLOSURE COST:

12,000-gallon tank =	\$17,542.00
Drum storage area =	15,638.00
Return and fill station <u>[NOTE: deleted reference to paint waste shelter; June 29, 1992]</u> =	9,028.00
<u>Masonry Shelter =</u>	<u>[June 29, 1992] \$20,976.00</u>
P.E. certification =	<u>1,000.00</u>
 Total	 <u>[June 29, 1992] \$64,184.00</u>

ATTACHMENT H

FINANCIAL LIABILITY DOCUMENTS



March 29, 1994

Via Federal Express

Director
New Mexico Env. Improvement Division
1190 St. Francis Drive
Santa Fe, New Mexico 87503

Subject: New Mexico Facilities
Financial Test Letter

Dear Sir or Madam,

Please find enclosed Safety-Kleen Corp.'s letter demonstrating financial assurance for our facilities in the State of New Mexico. As a result of Safety Kleen's reorganization in the fourth quarter of 1993, we no longer will be using a 5 to 10 percent (%) buffer, as we have in previous years, with our cost estimates. The figures provided to you for closure and post closure reflect the numbers from our closure plans with the proper inflation factors applied.

If you have any questions or comments, please contact me at (708) 468-2228.

Sincerely,

Michelle R. Walper

Michelle R. Walper
Environmental Disclosure Specialist

cc: Environmental Engineer(s)
Environmental Affairs Manager File - New Mexico III
New Mexico Branches - File #1620
Remediation Project Managers



Letter From Chief Financial Officer

Mr. Edward Horst
New Mexico Environmental Improvement Division
Hazardous Waste Bureau
1190 St. Francis Drive
Santa Fe, NM 87503

Dear Mr. Morgan:

I am the chief financial officer of Safety-Kleen Corp., 1000 North Randall Road, Elgin, Illinois, 60123. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and post-closure care is demonstrated through the financial test specified in New Mexico Hazardous Waste Management Regulations, Part 206.C.3 and 206.D.3. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: total per attached listing - closure \$115,500; post-closure \$0.
2. This firm guarantees, through the corporate guarantee specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3, the closure and post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure or post-closure care so guaranteed are shown for each facility: None.
3. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care is not demonstrated either to the New Mexico Environmental Improvement Division through the financial test or any other financial assurance mechanism specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: total per attached listing - closure \$26,925,886; post-closure \$15,405,628.

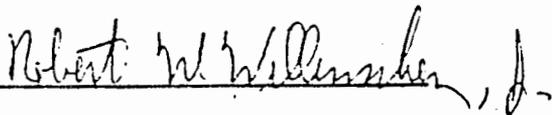
This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the Saturday closest to December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended January 1, 1994.

Alternative II

1.	Sum of current closure and post-closure cost estimates	\$ 42,447,014		
2.	Current bond rating of most recent issuance of this firm and name of rating service	BBB+, Standard and Poors		
3.	Date of issuance of bond	September 15, 1989		
4.	Date of maturity of bond	September 15, 1999		
*5.	Tangible net worth	\$ 255,950,000		
*6.	Total assets in U.S. (required only if less than 50% of firm's assets are located in the U.S.)	\$ 770,389,000		
			<u>YES</u>	<u>NO</u>
7.	Is line 5 at least \$10 million?		X	
8.	Is line 5 at least 6 times line 1?		X	
*9.	Are at least 90% of firm's assets located in the U.S.? If not, complete line 10.			X
10.	Is line 6 at least 6 times line 1?		X	

I hereby certify that the wording of this letter is identical to the wording specified in New Mexico hazardous Waste Management Regulations, Part II 206.D.3.J.(6) as such regulations were constituted on the date shown immediately below.



Robert W. Wilmschen, Jr.
Senior Vice President Finance and Secretary

March 15, 1994

cc: Stella Matoya

STATE OF NEW MEXICO

Albuquerque 7-008-01	2720 Girard NE Albuquerque, NM 87107	NMD 000804294	(\$ 68,200)	(0)
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Farmington 7-008-21	4200A Hawkins Road Farmington, NM 87401	NMD 980698849	(\$ 47,300)	(0)
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NEW MEXICO TOTALS:	closure:	post-closure:
	(\$ 115,500)	(0)

PARAGRAPH #1 TOTALS

closure

post-closure

\$115,500

\$0

STATE OF ALABAMA

Dolomite 3-019-01	1002 Hoke Avenue Dolomite, AL 35061	ALD 077640001	(\$ 54,000)	(0)
Gurley 3-019-02	201 Section Line St Gurley, AL 35748	ALD 000776807	(\$ 28,200)	(\$ 41,700)
Huntsville 3-019-02	2221 Highway 72 East Huntsville, AL 35811	ALD 981028798	(\$244,500)	(0)
Montgomery 3-019-21	4815 N. Birmingham Montgomery, AL 36308	ALD 000653303	(\$144,700)	(\$295,100)
Whistler C-133-01	3023 Dials Street Whistler, AL 36612	ALD 071951628	(\$171,300)	(\$373,500)
ALABAMA TOTALS:			closure:	post-closure:
			(\$642,700)	(\$710,300)

STATE OF ARIZONA

Phoenix 7-142-01	4401 E. University Phoenix, AZ 85034	AZD 089308803	\$ 29,800	\$180,100
Chandler 7-142-01	Lot 42, Beck Avenue Williams Field Rd. Ind. Park Chandler, AZ 05224	AZD 981969504	\$ 54,000	0
Tucson 7-142-02	4161 E. Tennessee Tucson, AZ 85714	AZD 980892897	\$ 64,700	0

ARIZONA TOTALS:

closure:	post-closure:
(\$148,500)	(\$180,100)

STATE OF ARKANSAS

Little Rock 6-086-01	11727 Arch Street Pike Little Rock, AR 72206	ARD 054575238	(\$ 84,600)	(0)
Fort Smith 6-053-01	2511 Johnson Street Fort Smith, AR 72904	ARD 000709733	(\$ 65,800)	(0)
West Memphis 6-094-01	309 Mound City Road West Memphis, AZ 72301	ARD 056855232	(\$ 52,000)	(0)

ARKANSAS TOTALS:

closure: post-closure:
(\$ 202,400) (0)

STATE OF COLORADO

Commerce City 6-052-01	4980 Locust Street Commerce City, CO 80022	COD 000716613	(\$ 53,300)	(0)
Denver	1345 Bayoud Avenue Denver, CO 80223	COD 980954101	(\$350,000)	(0)
Englewood 6-052-02	2801 S. Tejon Englewood, CO 80110	COD 000716621	(\$ 59,000)	(0)
Grand Junction 6-052-01	368 Bonny Grand Junction, CO 81501	COD 090010851	(\$ 49,800)	(0)
Pueblo 6-052-04	2841 East Fourth Street Pueblo, CO 81001	COD 000716639	(\$ 50,600)	(0)

COLORADO TOTALS:

closure:	post- closure
(\$562,700)	(0)

STATE OF CONNECTICUT

Branford 2-112-01	11 Tipping Drive Branford, CT 06405	CTD 990667927	(\$115,600)	(0)
West Hartford 2-070-01	24 Brixton Street West Hartford, CT 06110	CTD 000845982	(\$ 61,800)	(\$ 42,100)
Plainfield	39 Community Ave. Extension Plainfield, CT 06374	CTD 001156009	(\$ 82,600)	(0)
CONNECTICUT TOTALS:			closure:	post-closure:
			(\$260,000)	(\$ 42,100)

STATE OF FLORIDA

Casselberry 3-130-01	505 Plumosa Drive Altamonte Springs, FL 32701	FLD 097837983	(\$166,100)	(\$502,600)
Sanford 3-130-01	600 Central Park Drive Sanford, FL 32771	FLD 984171165	(\$ 49,300)	(0)
Delray Beach 3-097-01	1855 SW 4th Ave., Bldg. B, Bay 30 Delray Beach, FL 33444	FLD 000776757	(\$316,400)	(\$1,007,000)
Boynton Beach 3-097-01	5610 Alpha Drive Boynton, Beach, FL 33426	FLD 984167791	(\$ 41,700)	(0)
Orange Park 3-079-01	161 Industrial Loop South Orange Park, FL 32073	FLD 980847214	(\$ 52,400)	(0)
Miami 3-097-02	7875 NW 54th Street Miami, FL 33166	FLD 980840086	(\$ 61,800)	(\$1,507,000)
Medley 3-097-02	8755 95th Street Medley, FL 33178	FLD 984171694	(\$ 60,600)	(0)
Port Charlotte 3-163-02	19200 Peachland Blvd. Port Charlotte, FL 33949	FLD 000776716	(\$ 26,100)	(0)
Tallahassee 3-079-02	3082 West Tharpe Street Tallahassee, FL 32303	FLD 000776773	(\$ 81,300)	(\$546,700)
Tallahassee 3-079-02	4426 Entrepot Blvd. Tallahassee, FL 32310	FLD 982133159	(\$ 51,500)	(0)
Tampa 3-163-01	4701 North Manhattan Tampa, FL 33614	FLD 049557408	(\$257,800)	(\$815,500)
Tampa 3-163-01	5309 24th Avenue South Tampa, FL 33619	FLD 980847271	(\$143,500)	(0)

FLORIDA TOTALS:

closure:	post-closure:
(\$1,308,500)	(\$4,378,800)

STATE OF GEORGIA
Corrective Action Cost Estimate

Norcross 3-013-02	4800 S. Old Peachtree Road Norcross, Georgia 30071	GAD980842777	(\$339,200)
Columbus 3-106-01	5920 Coca Cola Blvd. Columbus, Georgia 31909	GAD000823096	(\$ 25,200)

CORRECTIVE ACTION TOTALS: (\$364,400)

STATE OF GEORGIA

Columbus 3-106-01	5920 Coca Cola Blvd. Columbus, GA 31909	GAD000823096	(\$ 31,300)	(0)
Garden City 3-179-01	5217 Augusta Road P. O. Box 7036 Garden City, GA 31408	GAD000776781	(\$ 33,000)	(0)
Hapeville 3-013-01	3440 Lang Avenue Hapeville, GA 30354	GAD000823070	(\$112,000)	(\$546,800)
Morrow 3-013-01	7027 Commercial Drive Morrow, GA 30260	GAD981265424	(\$ 50,100)	(0)
Macon 3-106-21	6850 Hawkinsville Road Macon, GA 31207	GAD980709257	(\$ 29,400)	(0)
Norcross 3-013-02	4800 S. Old Peachtree Rd Norcross, GA 30071	GAD980842777	(\$ 63,300)	(0)
Ringgold 3-019-22	RR #5, Dietz Road Ringgold, GA 30736	GAD980842835	(\$ 15,300)	(0)

GEORGIA TOTALS:

closure:

post-
closure:

(\$334,400)

(\$546,800)

STATE OF IDAHO

Boise 1-183-08	514 East 45th Street Boise, ID 83704	IDD 000712026	(\$ 46,702)	(\$ 42,025)
Pocatello 1-183-28	2610 Garrettway Pocatello, ID 83201	IDD 991281270	(\$ 51,575)	(\$ 42,025)
Boise 1-183-08	Supply Way/Gowan Rd Boise, ID 83705	IDD 931770498	(\$ 50,610)	(0)

IDAHO TOTALS:	closure:	post-closure:
	(\$148,887)	(\$ 84,050)

STATE OF ILLINOIS

Caseyville 5-160-02	20 Tucker Drive Caseyville, IL 62232	ILD 981097819	(\$ 285,500)	(0)	(\$ 285,500)
Chicago Recycle Center	1445 W. 42nd Street Chicago, IL 60609	ILD 005450697	(\$2,978,500)	(\$ 145,700)	(\$3,124,200)
Franklin Park 5-034-04	450 Domenic Court Franklin Park, IL 60131	ILD 000665869	(\$ 54,700)	(\$ 24,400)	(\$ 79,100)
Mokena 5-034-05	9631 West 194th Place Mokena, IL 60448	ILD 000665851	(\$ 92,800)	(\$ 24,400)	(\$ 117,200)
Pekin 5-136-01	RR #3 Pekin, IL 61554	ILD 093862811	(\$ 151,600)	(\$ 346,500)	(\$ 498,100)
Schaumburg 5-034-01	728 Morse Avenue Schaumburg, IL 60193	ILD 079749073	(\$ 314,800)	(273,300)	(\$ 588,100)
Urbana 5-033-01	500 Anthony Drive Urbana, IL 61801	ILD 981088388	(\$ 111,500)	(\$ 24,400)	(\$ 135,900)
Dolton Recycle Center	633 E. 138th Street P. O. Box 100 Dolton, IL 60419	ILD 980613913	(\$4,117,000)	(0)	(\$4,117,000)

ILLINOIS TOTALS:

closure:	post-closure:	closure and post-closure:
(\$10,831,400)	(\$3,710,000)	(\$14,541,400)

STATE OF INDIANA

Evansville 5-060-01	4417 St. Joe Street Evansville, IN 47712	IND 000815894	(\$ 57,400)	(0)
Fort Wayne 5-068-01	2112 Production Rd. Fort Wayne, IN 46808	IND 000715466	(\$ 63,100)	(0)
Indianapolis 4-076-02	8418-26 Brookville Rd. Indianapolis, IN 46239	IND 000815886	(\$ 283,400)	(0)
Greenwood 4-076-02	800 Park Drive Greenwood, IN 46142	IND 984874776	(\$ 55,000)	(0)
Portage 5-034-06	6050 Eagle Drive Portage, IN 46368	IND 000714428	(\$ 17,500)	(0)
South Bend 5-082-01	2217 Western Avenue South Bend, IN 46628	IND 000715474	(\$ 176,100)	(0)

INDIANA TOTALS:	closure:	post-closure:
	(\$ 652,500)	(0)

STATE OF INDIANA

Safety-Kleen Oil
Recovery Company
(SKORC)

601 Riley Road
E. Chicago, IN 46312

IND 077042034 (\$ 901,100) (0)

INDIANA TOTALS:

closure: post-closure:

(\$ 901,100) (0)

STATE OF KANSAS

Dodge City 6-195-21	600 East Trail Dodge City, KS 67801	KSD 980686844	(\$ 75,000)	(0)
Wichita 6-195-01	1311 South Anna Wichita, KS 67209	KSD 000809723	(\$ 155,000)	(0)
Edwardsville 5-085-01	9317 Woodend Road Edwardsville, KS 66022	KSD 980973515	(\$ 60,000)	(0)
Bonner Springs 5-085-01	11565 K 32 Highway Bonner Springs, KS	KSD 000687681	(0)	(\$1,097,000)
KANSAS TOTALS:			closure:	post-closure:
			(\$ 290,000)	(\$1,097,000)

STATE OF KENTUCKY

Ashland 4-075-01	1592 Wolohan Drive Ashland, KY 41101	KYD 000776724	(\$ 153,800)	(\$1,281,300)
Ashland 4-075-01	12092 Virginia Ave. Ashland, KY 41101	KYD 981027451	(\$ 153,800)	(0)
Lexington 4-090-01	550 Blue Sky Pkwy Lexington, KY 40509	KYD 981027469	(\$ 55,500)	(0)
Louisville 4-091-01	751 Grade Lane Louisville, KY 40213	KYD 091514653	(\$ 153,800)	(\$ 266,500)
New Castle (RC)	State Highway 146 New Castle, KY 40050	KYD 053348108	(\$ 423,500)	(\$ 100,600)

KENTUCKY TOTALS:	closure:	post-closure:
	(\$ 941,400)	(\$1,648,400)

STATE OF LOUISIANA

Pineville 6-073-04	4200 Shreveport Highway Pineville, LA 71360	LAD 000757708	(\$ 150,000)	(0)
Pineville 6-073-04	518 Ryder Drive Pineville, LA 71360	LAD 981057441	(\$ 92,200)	(0)
Kenner 6-115-01	14 26th Street Kenner, LA 70062	LAD 089841902	(\$ 66,800)	(0)
Kenner 6-115-01	Tyler Avenue Kenner, LA 70062	LAD 985171024	(\$ 111,100)	(0)

LOUISIANA TOTALS: closure: post-closure:
(\$ 420,100) (0)

STATE OF MAINE

Leeds 2-011-01	Route 202, RFD 3, Box 1990 Leeds, Maine 04263	MED 980667810	(\$ 52,300)	(0)
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TOTALS FOR MAINE:	closure:	post-closure:
	(\$ 52,300)	(0)

STATE OF MINNESOTA

Cloquet 5-050-01	1302 18th Street Cloquet, MN 55720	MND 000686170	(\$ 25,400)	(0)
St Paul 5-103-01	180 Ryan Drive St Paul, MN 55117	MND 000823823	(\$ 1,000)	(0)
Blaine 5-103-01	Lot 1 & Hokanson Industrial Park 8261 Isanti Street NE Blaine, MN 55449	MND 981953045	(\$ 50,800)	(0)
Eagan 5-103-02	3227 Terminal Drive Eagan, MN 55121	MND 981097884	(\$ 65,100)	(0)
Burnsville 5-103-02	1401 Cliff Road Burnsville, MN 55337	MND 000686188	(\$ 42,700)	(0)

MINNESOTA TOTALS: closure: post-closure:
(\$ 185,000) (0)

STATE OF MISSISSIPPI

Jackson 6-078-01	120 Richardson Drive Jackson, MS 39209	MSD 000776765	(\$ 51,600)	(0)
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Southaven 6-094-01	7217 Airways Avenue Southaven, MS 38671	MSD 981030894	(\$ 85,500)	(0)
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MISSISSIPPI TOTALS:	closure:	post-closure:
	(\$ 137,100)	(0)

STATE OF NEBRASKA

Gering 6-052-03	RR 1, Box 15E Gering, NE 69341	NED 000687178	(\$ 35,300)	(0)
Grand Island 5-065-01	Highway 281 South Grand Island, NE 68801	NED 000687186	(\$ 108,400)	(\$ 745,000)
Grand Island 5-065-01	2700 West 2nd Avenue Grand Island, NE 68801	NED 053316535	(\$ 54,000)	(0)
Omaha 5-127-01	14564 Grover Street Omaha, NE 68144	NED 020185138	(\$ 41,300)	(0)
Omaha 5-127-01	Lamont & 139th Street Omaha, NE 68144	NED 981495724	(\$ 297,700)	(0)

NEBRASKA TOTALS:

closure:	post-closure:
(\$ 536,700)	(\$ 745,000)

STATE OF NORTH CAROLINA

Charlotte 3-031-01	2320 Yadkin Avenue Charlotte, NC 28205	NCD 079060059	(\$ 87,500)	(0)
Raleigh 3-171-01	Sommerville Industrial Bldg. Route 3, 6225 Old State Road Raleigh, NC 27603	NCD 000776740	(\$ 81,500)	(0)
High Point 3-064-01	High Point Building 6182 Old Mendenhall Road Archdale, NC 27263	NCD 077840148	(\$ 114,700)	(0)
St. Pauls 3-031-02	Highway 301 North St. Pauls, NC 28384	NCD 980849935	(\$ 78,300)	(0)

NORTH CAROLINA TOTALS:

closure:	Post-closure:
(\$ 362,000)	(0)

STATE OF NORTH DAKOTA

Fargo 1537-1/2 First Avenue South NDD 000716738 (\$ 29,700) (0)
1-183-03 Fargo, ND 58103

Bismarck 3704 Saratoga NDD 980957070 (\$ 29,300) (0)
1-183-23 Bismarck, ND 58501

NORTH DAKOTA TOTALS: closure: post-closure:
(\$ 59,000) (0)

STATE OF OKLAHOMA

Wheatland 7825 State Highway 152 OKD 980878474 (\$ 48,200) (0)
6-124-01 Wheatland, OK 73097-0128

Tulsa 16319 East Marshall Street OKD 000763821 (\$ 94,300) (0)
6-193-01 Tulsa, OK 74116

OKLAHOMA TOTALS: closure: post-closure:
(\$ 142,500) (0)

STATE OF OREGON

Springfield 7-054-01	550 Shelley Street Space C and D Springfield, OR 97477	ORD 000712067	(\$ 15,400)	(0)
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Clackamas 7-148-01	11845 SE Highway 212 Clackamas, OR 97015	ORD 092895481	(\$ 140,600)	(0)
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Clackamas 7-148-01) 0-007-89	16540 SE 130th Street Clackamas, OR 97015	ORD 981766124	(\$ 143,000)	(0)
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OREGON TOTALS:	closure:	post-closure:
	(\$ 299,000)	(0)

COMMONWEALTH OF PUERTO RICO

Safety-Kleen Envirosystems Company of Puerto Rico Inc.	KM 51 Hwy. 2 P.O. Box 1098 Manatí, PR 00701	PRD 090399718	(\$ 355,300)	(0)
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Safety-Kleen Envirosystems of Puerto Rico, Inc.	KM 267, Hwy. 2 Dorado, PR 00613	PRD 981182421	(\$ 94,200)	(0)
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PUERTO RICO TOTALS:

closure:

post-closure:

(\$ 449,500)

(0)

STATE OF SOUTH CAROLINA

Greer 3-066-01	2818 Old Woodruff Rd Greer, SC 29651	SCD 981031040	(\$ 74,500)	(0)
Lexington RC/3-043-01	Route 5, Box 319A Lexington, SC 29072	SCD 077995488	(\$ 439,600)	(\$ 45,000)
Florence 3-043-21	Highway 301 South Florence, SC 29501	SCD 930842785	(\$ 54,400)	(0)
Summerville 3-179-21	2500 Highway 17A South Summerville, SC 29483	SCD 980709299	(\$ 49,000)	(\$ 430,000)
Holly Hill (RC)	Rt. 2, Box 418 Hwy. 453 South Holly Hill, SC 29059	SCD 003363891	(\$ 390,500)	(0)

SOUTH CAROLINA TOTALS: closure: post-closure:
(\$1,008,000) (\$ 475,000)

STATE OF SOUTH DAKOTA

Sioux Falls 1-183-05	2000 North Westport Avenue Sioux Falls, SD 57107	SDD 000716696	(\$ 40,100)	(0)
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SOUTH DAKOTA TOTALS:	closure:	post-closure:
	(\$ 40,100)	(0)

STATE OF TEXAS

Abilene 6-002-01	4234 Oil Belt Lane Abilene, TX 79605	TXD 062287883	(\$ 74,700)	(\$ 23,600)
Amarillo 6-009-02	3811 Interstate 40 East Amarillo, TX 79104	TXD 000747410	(\$ 77,000)	(\$ 23,600)
Corpus Christi 6-048-01	3820 Bratton Road Corpus Christi, TX 78415	TXD 000747402	(\$ 49,000)	(0)
Denton R/C 6-006-18	1722 Cooper Creek Road Denton, TX 76201	TXD 077603371	(\$ 987,500)	(\$ 102,000)
El Paso 6-056-01	900A Hawkins Blvd. El Paso, TX 79905	TXD 000747394	(\$ 69,800)	(0)
Ft. Worth 6-049-02	6529 Midway Road Haltom City, TX 76117	TXD 981053416	(\$ 57,000)	(0)
Irving 6-049-01	2130A East Grauwyler Irving, TX 75061	TXD 981052061	(\$ 121,700)	(0)
Longview 6-194-01	202 Michael Place Longview, TX 75602	TXD 000747378	(\$ 47,700)	(0)
Lubbock 6-009-01	1 Mile East of Loop 289 On Highway 62 & 82 Lubbock, TX 79408	TXD 000747436	(\$ 40,100)	(0)
McAllen 6-048-02	1/4 Mile North Jackson Road 1/8 Mile West International McAllen, TX 78501	TXD 083145656	(\$ 53,000)	(0)
Midland 6-002-02	10043-B County Rd. 125-W Midland, TX 79711	TXD 981054617	(\$ 77,800)	(0)
Missouri City 6-073-02	1580 Industrial Road Missouri City, TX 77459	TXD 010803203	(\$ 211,800)	(\$ 723,000)
Orange 6-073-03	3304 Womack Road Orange, TX 77630	TXD 061290276	(\$ 48,800)	(0)
Pasadena 6-073-01	3333 Federal Road Pasadena, TX 77504	TXD 000747386	(\$ 82,800)	(\$ 41,600)
San Antonio 6-169-01	5243 Sinclair Road San Antonio, TX 78222	TXD 000729400	(\$ 172,800)	(0)

Waco
6-049-03

22006 Woodway Dr.
Highway 84 West
Waco, TX 76712

TXD 983876015

(\$ 43,200) (0)

Wichita Falls
6-049-04

1606 Missile Road
Wichita Falls, TX 76306

TXD 000747428

(\$ 56,300) (0)

TEXAS TOTALS:

closure:

post-closure:

(\$2,271,000)

(\$ 913,800)

STATE OF UTAH

Salt Lake City 7-166-01	394 Ironwood Drive Salt Lake City, UT 84115	UTD 052430741	(\$ 53,500)	(0)
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Salt Lake City 7-166-01	1066 Pioneer Road Salt Lake City, UT 84104	UTD 980957088	(\$ 54,500)	(0)
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UTAH TOTALS:	closure;	post-closure:
	(\$ 108,000)	(0)

STATE OF VERMONT

Barre 2-105-01	23 West Second Street Barre, Vermont 05641	VTD 000791699	(\$ 198,500)	(0)
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VERMONT TOTALS:	closure:	post closure:
	(\$ 198,500)	(0)

STATE OF VIRGINIA

Bristol 3-026-01	2146 King Mill Road Bristol, VA 24201	VAD 000 737 338	(\$ 434,100)	(0)
Chesapeake 3-121-01	4545 Bainbridge Blvd. Chesapeake, VA 23320	VAD 000 737 346	(\$ 125,500)	(0)
Chester 3-154-01	1200 West 100 Road Chester, VA 23831	VAD 981 043 011	(\$ 79,800)	(0)
Vinton 3-155-01	Route 24 East of Vinton at O'Neal Drive Vinton, VA 24179	VAD 000 737 361	(\$ 124,700)	(0)

VIRGINIA TOTALS:	closure:	post-closure:
	(\$ 764,100)	(0)

STATE OF WASHINGTON

Auburn 1-181-01	3210 C Street NE Unit G Auburn, WA 98002	WAD 000712059	(\$ 42,000)	(0)
Lynnwood 7-092-01	6303 212th Street SW Suite C Lynnwood, WA 98036	WAD 000712042	(\$ 42,500)	(0)
Pasco 1-183-02	814 E. Ainsworth Pasco, WA 99301	WAD 980978746	(\$ 36,500)	(0)
Spokane 1-183-01	9516 East Montgomery Unit 16 Spokane, WA 99206	WAD 000712034	(\$ 30,500)	(0)

WASHINGTON TOTALS:

closure;	post-closure:
(\$ 151,500)	(0)

	<u>closure</u>	<u>post-closure</u>
PARAGRAPH #3 TOTALS	\$26,925,886	\$15,405,628

ARTHUR ANDERSEN & CO.

REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS

To the Board of Directors and
Management of Safety-Kleen Corp.:

We have audited, in accordance with generally accepted auditing standards, the consolidated financial statements of Safety-Kleen Corp. (a Wisconsin corporation) and Subsidiaries (the "Company") for the fiscal years ended January 1, 1994 and January 2, 1993, and have issued our report thereon dated February 10, 1994 that included an explanatory paragraph with respect to the changes in the methods of accounting for postretirement benefits other than pensions and accounting for income taxes, effective December 29, 1991, as discussed in Notes 7 and 8 to those consolidated financial statements. We have not performed any auditing procedures since that date.

At your request, we have read the letter dated March 15, 1994, from your chief financial officer to the Environmental Protection Agency ("EPA") and compared the data therein that is specified as having been derived from the audited consolidated financial statements for the year ended January 1, 1994, referred to above, with the corresponding amounts in those financial statements. In connection with this procedure, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report is furnished solely for the use of the Company and the EPA and should not be used for any other purpose.

Chicago, Illinois,
March 15, 1994

Arthur Andersen & Co.

ARTHUR ANDERSEN & CO.

REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS

To the Board of Directors and
Shareholders of Safety-Kleen Corp.:

We have audited the accompanying consolidated balance sheets of Safety-Kleen Corp. (a Wisconsin corporation) and Subsidiaries as of January 1, 1994, and January 2, 1993, and the related consolidated statements of operations, shareholders' equity and cash flows for each of the three fiscal years in the period ended January 1, 1994. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Safety-Kleen Corp. and Subsidiaries as of January 1, 1994, and January 2, 1993, and the results of their operations and their cash flows for each of the three fiscal years in the period ended January 1, 1994, in conformity with generally accepted accounting principles.

As discussed in Notes 7 and 8 to the consolidated financial statements, effective December 29, 1991, the Company changed its methods of accounting for postretirement benefits other than pensions and income taxes.

Arthur Andersen & Co.

Chicago, Illinois,
February 10, 1994

ATTACHMENT I

PART A PERMIT APPLICATION

ATTACHMENT I

PART A PERMIT APPLICATION

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

<p>For EPA Regional Use Only</p>	<h1 style="margin: 0;">EPA</h1> <p style="margin: 0;">United States Environmental Protection Agency Washington, DC 20460</p> <h2 style="margin: 0;">Hazardous Waste Permit Application</h2> <h3 style="margin: 0;">Part A</h3> <p style="margin: 0;"><i>(Read the Instructions before starting)</i></p>																			
<p>Date Received</p> <p>Month Day Year</p>																				
<p>I. Installation's EPA ID Number (Mark 'X' in the appropriate box)</p>																				
<input type="checkbox"/> A. First Part A Submission	<input checked="" type="checkbox"/> B. Part A Amendment #	<u>4/30/1996</u>																		
<p>C. EPA ID Number</p> <p style="text-align: center;">N M D 0 0 0 8 0 4 2 9 4</p>		<p>D. Secondary ID Number (if applicable)</p>																		
<p>II. Name of Facility</p> <p style="text-align: center;">SAFETY-KLEEN CORP.</p>																				
<p>III. Facility Location (Physical address not P.O. Box or Route Number)</p>																				
<p>A. Street</p> <p style="text-align: center;">2720 GIRARD BLVD NE</p>																				
<p>Street (continued)</p>																				
<p>City or Town</p> <p style="text-align: center;">ALBUQUERQUE</p>		<p>State Zip Code</p> <p style="text-align: center;">NM 8 7 1 0 7 - 1 8 4 6</p>																		
<p>County Code <small>(if known)</small></p>	<p>County Name</p> <p style="text-align: center;">BERNALILLO</p>																			
<p>B. Land Type <small>(Enter Code)</small></p>	<p>C. Geographic Location</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="3">LATITUDE <small>(degrees, minutes & seconds)</small></th> <th colspan="3">LONGITUDE <small>(degrees, minutes & seconds)</small></th> </tr> <tr> <td style="text-align: center;">35</td> <td style="text-align: center;">06</td> <td style="text-align: center;">44N</td> <td style="text-align: center;">106</td> <td style="text-align: center;">36</td> <td style="text-align: center;">46W</td> </tr> </table>	LATITUDE <small>(degrees, minutes & seconds)</small>			LONGITUDE <small>(degrees, minutes & seconds)</small>			35	06	44N	106	36	46W	<p>D. Facility Existence Date</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>Month</th> <th>Day</th> <th>Year</th> </tr> <tr> <td style="text-align: center;">03</td> <td style="text-align: center;">01</td> <td style="text-align: center;">1977</td> </tr> </table>	Month	Day	Year	03	01	1977
LATITUDE <small>(degrees, minutes & seconds)</small>			LONGITUDE <small>(degrees, minutes & seconds)</small>																	
35	06	44N	106	36	46W															
Month	Day	Year																		
03	01	1977																		
<p>IV. Facility Mailing Address</p>																				
<p>Street or P.O. Box</p> <p style="text-align: center;">2720 GIRARD BLVD NE</p>																				
<p>City or Town</p> <p style="text-align: center;">ALBUQUERQUE</p>		<p>State Zip Code</p> <p style="text-align: center;">NM 8 7 1 0 7 - 1 8 4 6</p>																		
<p>V. Facility Contact (Person to be contacted regarding waste activities at facility)</p>																				
<p>Name (last)</p> <p style="text-align: center;">LEUTNER</p>		<p>(first)</p> <p style="text-align: center;">DIANA</p>																		
<p>Job Title</p> <p style="text-align: center;">REGIONAL ENVIRONMENTAL MANAGER</p>		<p>Phone Number (area code and number)</p> <p style="text-align: center;">303 - 377 - 8424</p>																		
<p>VI. Facility Contact Address (See instructions)</p>																				
<p>A. Contact Address</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>Location</th> <th>Mailing</th> <th>Other</th> </tr> <tr> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> </table>		Location	Mailing	Other	X			<p>B. Street or P.O. Box</p> <p style="text-align: center;">3333 QUEBEC ST., PENTHOUSE A</p>												
Location	Mailing	Other																		
X																				
<p>City or Town</p> <p style="text-align: center;">DENVER</p>		<p>State Zip Code</p> <p style="text-align: center;">CO 8 0 2 0 7 -</p>																		

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
N M D 0 0 0 8 0 4 2 9 4	
XI. Nature of Busin (provide a brief description)	

This location is primarily a local sales/service office and warehouse for Safety-Kleen products consisting of small parts cleaning equipment, solvent and allied products such as hand cleaner, parts washing brushes, etc. Safety-Kleen collects used solvents from the customer for temporary storage at this facility. Once a sufficient quantity of materials is collected, the materials are moved off-site in a semi trailer to a Safety-Kleen recycling center.

XII. Process - Codes and Design Capacities

- A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04, and X99), describe the process (including its design capacity) in the space provided in Item XIII.
- B. PROCESS DESIGN CAPACITY** - For each code entered in Column A, enter the capacity of the process.
- 1. AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 - 2. UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Disposal Injection Well	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour
D80	Landfill	Acre-feet of Hectare-meter	T88	Titanium Dioxide Chloride Process	
D81	Land Application	Acres of Hectares	T89	Oxidation Reactor	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T90	Methane Reforming Furnace	
D83	Surface Impoundment	Gallons or Liters	T91	Pulping Liquor Recovery Furnace	
D99	Other Disposal Storage	Any unit of measure listed below	T92	Combustion Device Used in the Recovery of Sulfur Values From Spent Sulfuric Acid	
S01	Container (barrel, drum, etc.)	Gallons or Liters	T93	Halogen Acid Furnaces	
S02	Tank	Gallons or Liters	T94	Other Industrial Furnaces Listed In 40 CFR §260.10	
S03	Waste Pile	Gallons or Liters		Containment Building-Treatment	
S04	Surface Impoundment	Gallons or Liters			
S05					
S06	Containment Building-Storage	Cubic Yards or Cubic Meters			
S99	Other Storage Treatment	Any Unit of Measure Listed Below			
T01	Tank	Gallons Per Day or Liters Per Day			
T02	Surface Impoundment	Gallons Per Day or Liters Per Day			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or BTU's Per Hour	X01	Miscellaneous (Subpart X): Open Burning/Open Incineration	Any Unit of Measure Listed Below
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
T80	Boiler	Gallons or Liters	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; or Btu's Per Hour
T81	Cement Kiln	Gallons Per Day; Liters Per Day	X04	Geologic Repository	Cubic Yards or Cubic Meters
T82	Lime Kiln	Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below
T83	Aggregate Kiln				
T84	Phosphate Kiln				
T85	Coke Oven				
T86	Blast Furnace				

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liter Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu's Per Hour	K

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1) NMD000804294	Secondary ID Number (enter from page 1)
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XII. Process - Codes and Design Capacities (continued)

EXAMPLES FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank which can hold 533,788 gallons.

Line Number	A. Process Code <small>(From list above)</small>			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only				
				1. Amount (Specify)	2. Unit Of Measure <small>(Enter Code)</small>						
X 1	S	0	2	533	788	G	001				
1	S	0	1	16,640	.	G	003				
2	S	0	2	12,000	.	G	001				
3											
4											
5											
6											
7											
8											
9											
1 0											
1 1											
1 2											
3											

NOTE: If you need to list more than 1 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number <small>(Enter #s in seg w/XII)</small>	A. Process Code <small>(From list above)</small>			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description of Process
				1. Amount (Specify)	2. Unit of Measure <small>(Enter Code)</small>		
X 1	T	0	4				In-situ Vitrification
1							
2							
3							
4							

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1)

Secondary ID Number (enter from page 1)

N M D 0 0 0 8 0 4 2 9 4

Process - Codes and Design Capacities

(continued)

EPA I.D. Number (enter from page 1) Secondary ID Number (enter from page 1)

N M D 0 0 0 8 0 4 2 9 4

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CF, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item XIV-D(1).
3. Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be in the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS															
	(1) PROCESS CODES (Enter Code)						(2) PROCESS DESCRIPTION (If a code is not entered in D(1))															
X	1	K	0	5	4	900	P	T	0	3	D	8	0									
X	2	D	0	0	2	400	P	T	0	3	D	8	0									
	3	D	0	0	1	100	P	T	0	3	D	8	0									
	4	D	0	0	2																	Included with above

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EPA I.D. Number (enter from page 1) **NMD000804294** Secondary ID Number (enter from page 1)

Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES																	
				(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))							
3	4	F002	90	T	S	0	1														
3	5	F003																			Included with above
3	6	F004																			Included with above
3	7	F005																			Included with above
3	8	D001																			Included with above
4	9	D004																			Included with above
4	0	D005																			Included with above
4	1	D006																			Included with above
4	2	D007																			Included with above
4	3	D008																			Included with above
4	4	D009																			Included with above
4	5	D010																			Included with above
4	6	D011																			Included with above
4	7	D018																			Included with above
4	8	D019																			Included with above
5	9	D021																			Included with above
5	0	D022																			Included with above
5	1	D023																			Included with above
5	2	D024																			Included with above
5	3	D025																			Included with above
5	4	D026																			Included with above
5	5	D027																			Included with above
5	6	D028																			Included with above
5	7	D029																			Included with above
5	8	D030																			Included with above
6	9	D032																			Included with above
6	0	D033																			Included with above
6	1	D034																			Included with above
6	2	D035																			Included with above
6	3	D036																			Included with above
6	4	D037																			Included with above
6	5	D038																			Included with above
6	6	D039																			Included with above

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EPA I.D. Number (enter from page 1)		Secondary ID Number (enter from page 1)										
NMD000804294												
Description of Hazardous Wastes (continued)												
Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES								(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)								
6	7	D040										Included with above
6	8	D041										Included with above
6	9	D042										Included with above
7	0	D043										Included with above
7	1											
7	2											
7	3											
7	4											
7	5											
7	6											
7	7											
7	8											
7	9											
8	0											
8	1											
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EPA ID Number (enter from page 1) NMD000804294	Secondary ID Number (enter from page 1)
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Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

NO CHANGE - SUBMITTED PREVIOUSLY

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

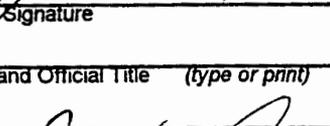
All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures, existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas (see instructions for more detail).

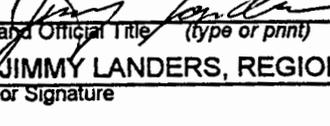
NO CHANGE - SUBMITTED PREVIOUSLY

XVIII. Certification(s)

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 who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be 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.

Owner Signature 	Date Signed 5-15-96
Name and Official Title (type or print) JIMMY LANDERS, REGIONAL SALES MANAGER	

Owner Signature 	Date Signed
Name and Official Title (type or print)	

Operator Signature 	Date Signed 5-15-96
Name and Official Title (type or print) JIMMY LANDERS, REGIONAL SALES MANAGER	

Operator Signature	Date Signed
Name and Official Title (type or print)	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

ATTACHMENT J

POLLUTION PREVENTION (WASTE MINIMIZATION) PLAN

(Attachment Added January 1996)

Safety-Kleen Corp.

Waste Minimization Program

March, 1996

ALBUQUERQUE, NEW MEXICO SERVICE CENTER

EPA ID # N.M.D. 000804294

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Section 1.0

Introduction

Safety-Kleen's business is to facilitate the wise use and reuse of resources by providing quality recycling services. As part of Safety-Kleen's commitment to its customers and the environment, Safety-Kleen has established a Waste Minimization Program.

The goals of the program are:

- * To educate Safety-Kleen personnel about waste minimization opportunities.
- * To facilitate education of Safety-Kleen facility management about ways they can minimize waste generation.

Safety-Kleen has developed this program with U.S. Environmental Protection Agency guidance. It is designed to:

- * Help Safety-Kleen personnel identify mechanisms to minimize waste.
- * Provide Safety-Kleen management with information regarding the Company's responsibility to minimize waste.

1.1 A Phased Approach to a Waste Minimization Program

The following summarizes Safety-Kleen's phased approach to a Waste Minimization Program.

1. Educate employees about waste minimization (what it is and how to achieve it).
2. Train personnel to identify opportunities for waste minimization as it relates to Safety-Kleen facility operations.
3. Train personnel by communicating waste minimization alternatives as it relates to daily facility operations.
4. Provide written waste minimization information to management.

This document addresses the four phases of the Safety-Kleen program.

Section 2.0

What is Waste Minimization?

Waste minimization is specifically required by the U.S. Congress in the 1984 Hazardous and Solid Waste Amendments to the Resource and Conservation and Recovery Act (RCRA). Waste minimization consists of source reduction and recycling. More specifically, waste minimization is the reduction of the generation and disposal of hazardous waste. It includes source reduction and recycling that results in either:

- * The reduction of the total volume or quantity of hazardous waste, or
- * The reduction of the toxicity of hazardous waste.

Waste minimization results in the minimization of threats to human health and the environment. Figure 2-1 on page 2-4 depicts waste minimization techniques.

2.1 Volume (Source) Reduction

Volume or source reduction is any activity that reduces or eliminates the generation of hazardous waste at the source. Controlling the sources of waste generation reduces the volume of hazardous waste that is produced.

Safety-Kleen personnel consider using the following volume reduction activities:

- **Substituting Materials** - Using materials which do not create a waste, or which can be beneficially reused, recycled, or reclaimed.

Examples of Safety-Kleen's source reduction techniques are:

- * Using dirty solvent instead of clean for drum washing.
- * Using corn cob absorbent instead of clay, since it can be fuel blended.
- * Using metal filters on machines, instead of the disposable cloth filters.

Technology - Changing processes, equipment, and operations to reduce the amount of waste generated.

An example of a technology change at Safety-Kleen is to reduce the amount of waste generated by no longer using liner bags to keep the inside of parts washer drums clean. This eliminates the additional liner bag waste material.

Operating Practices - Segregating waste streams, changing material handling procedures, and changing management practices.

Examples of Safety-Kleen's operating practices that result in waste reduction are:

- * Reducing the amount of spills that occur by more careful material handling.
- * Reducing the amount of waste generated from the cleanup of a spill by paving areas where releases are more likely to occur.
- * Segregating recyclable materials from trash.
- * Segregating contaminated burnable materials (labels, gloves, etc) and non-burnable materials (metal pieces, glass, rocks, etc.) to reduce the amount of land filled waste.
- * Keeping containment areas clean so that any accumulated rainwater does not become contaminated.

See Section 3.0., Achieving Waste Minimization, for more information about volume reduction techniques.

2.2 Toxicity Reduction

Toxicity reduction results in reduced volume and types of waste generated. In some instances, Safety-Kleen has changed a process to limit or exclude contamination of waste with toxic components. More often, wastes are treated, either on or off-site, to remove toxic contaminants.

Safety-Kleen provides many services which remove hazardous and toxic components from a waste to return the cleaned material to beneficial use. For example, Safety-Kleen removes oil and water, in addition to hazardous waste constituents of lead and perchloroethylene, from used ethylene glycol. The reclaimed ethylene glycol is then marketed to ethylene glycol buyers.

2.3 Recycling

Recycling includes using, reusing, or reclaiming a material. Recycling occurs either on the site of generation or at a separate, off-site facility. Additional details on recycling are provided in Section 3.0, Achieving Waste Minimization.

2.4 Elements of a Waste Minimization Program

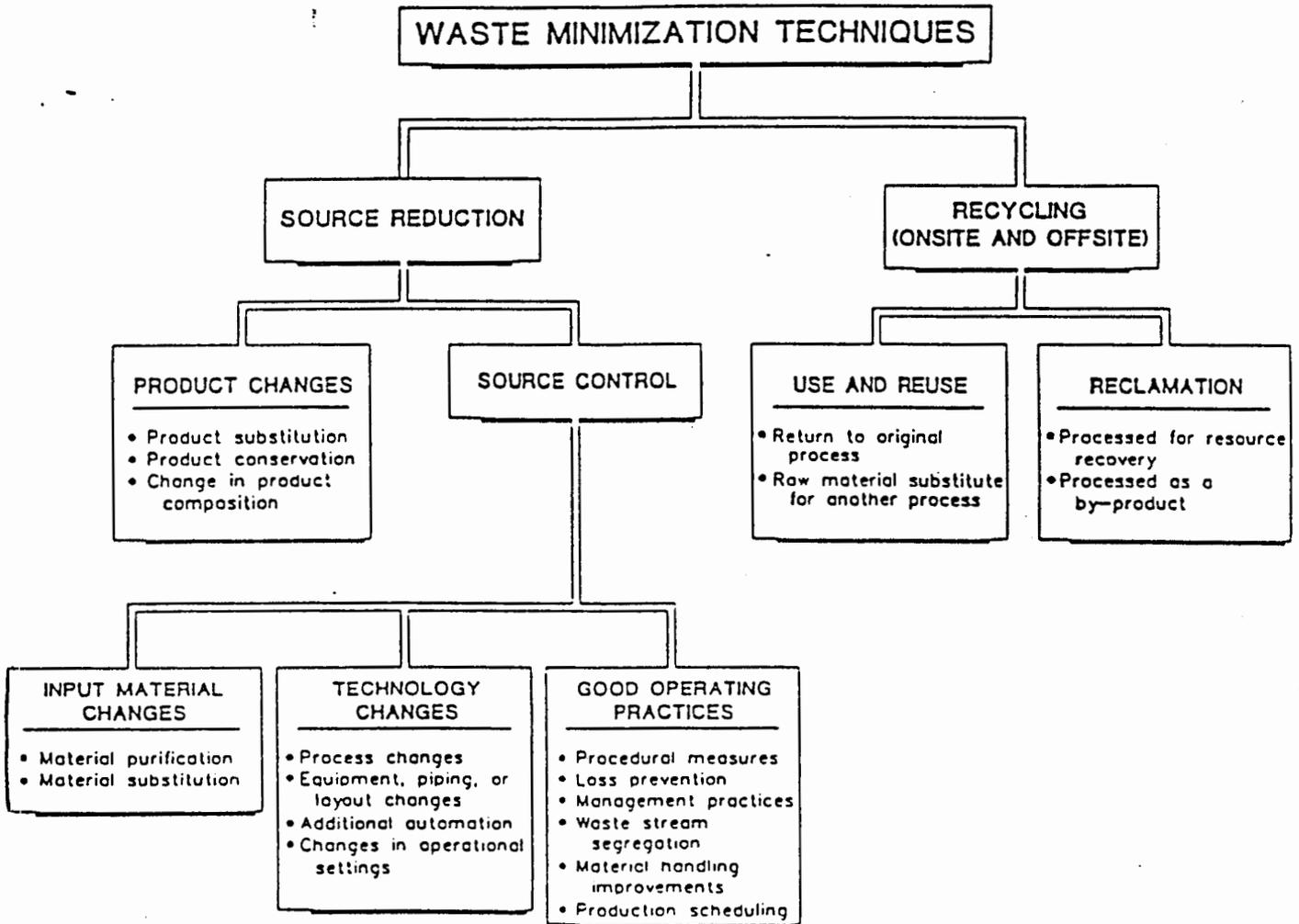
As discussed earlier, RCRA requires generators to establish waste minimization at their facilities. To do this cost-effectively, Safety-Kleen's waste minimization program has the following elements:

- * **Management Commitment** - The facility personnel understand why waste minimization is important. Management supports and rewards employees for developing and implementing waste minimization.
- * **Waste minimization assessment** - The facility personnel evaluate ways to reduce and eliminate waste. This assessment analyzes what materials are used, what materials can be substituted, how mixing of waste can be avoided, and whether alternate technologies are available for reducing waste.

For example, Safety-Kleen encourages mixing only when it facilitates the beneficial reclamation and reuse of BOTH waste streams. An example is the mixing of hazardous and non-hazardous waste solvent. Since it is not economically feasible to ship these streams to the reclamation facility without mixing, Safety-Kleen has decided that mixing these streams facilitates increased reclamation of these wastes.

However, mixing of solvents and other wastes with waste oil decreases the feasibility of reclaiming the used oil for any purpose other than fuels blending (this can occur when both are shipped by the same carrier). Therefore, mixing with waste oil is strongly discouraged.

**FIGURE 2-1
WASTE MINIMIZATION TECHNIQUES**



NOTE: Figure prepared by ERM South for Safety-Kleen

Section 3.0

Achieving Waste Minimization

Safety-Kleen achieves waste minimization in several ways. The following briefly discusses options that Safety-Kleen practices at its facilities.

3.1 Source Reduction through Good Operating Practices

Safety-Kleen operating practices facilitate reduction of waste at the source as follows:

Waste Segregation - Encouraging employees to use specific waste receptacles.

Examples of waste segregation techniques practiced at Safety-Kleen are:

- * Paper waste is divided into recyclable waste and non-recyclable waste.
- * Used petroleum products are not mixed with other solvent waste.
- * Water-based waste, such as aqueous solvent, is segregated from other solvents.

This minimizes the quantities of wastes that require special handling when generated.

Material Handling and Inventory Practices - Safety-Kleen management ensures that hazardous materials are properly stored to avoid spillage or damage and the resulting cleanup of waste material. Proper inventory management ensures that materials are not discarded due to age. Similarly, hazardous materials are ordered in quantities sufficient for operation. Larger quantities are not stored that could result in improper storage, exceeding of shelf-life, and spills or accidents involving crowded storage areas.

Loss Prevention - Materials can become wastes when equipment leaks or spills occur. In addition, using too much of a material results in waste generation (for example, using too much solvent creates more waste). Safety-Kleen management reminds employees to properly maintain equipment and to avoid mishaps such as spills of solvents.

Cost Accounting Procedures - For Safety-Kleen facilities, cost-accounting of waste disposal costs encourages significant waste minimization. When specific departments are held accountable for their own waste disposal cost, they are more waste conscientious. Management periodically reviews each facility's performance in waste generation and management.

Production Schedules - The product Distribution Centers schedule their trips to service centers to reduce the need for frequent equipment cleaning, which could result in waste generation.

3.2 Source Reduction through Process Modifications

Safety-Kleen management considers the following options to reduce waste using process modifications:

- * Changes in production methods
- * Changes in equipment
- * Changes in operating conditions, such as flow rates, temperature, pressure, residence time

3.3 Source Reduction through Product Changes

Safety-Kleen considers opportunities to minimize waste by changing products. Changes include:

- * Substituting products - Safety-Kleen now supplies a less toxic non-halogenated Immersion Cleaner (699) in place of much of its old formula to its customers.
- * Conserving products
- * Changing the composition of the product

3.4 Waste Minimization through Material Recycling and Recovery

Recycling: Use or Reuse

Recycling may be achieved through use or reuse of a waste material. Essentially the waste material is returned to a process to replace a certain amount of new material. The process may be the same process from which the waste came, or an entirely new process.

Examples of Safety-Kleen's recycling practices include:

- * Reusing paint wastes in a painting process that does not require a specific color
- * Using sludge as fuel

Recovery: Reclamation

Reclamation involves recovering a valuable material from hazardous wastes and nonhazardous wastes. Generally, a reclaimed material is not used at the same facility where it was generated.

Examples of Safety-Kleen's reclamation practices are:

- * Reclaiming fuel oil from waste oil
- * Recovering silver from film processing wastewater, and waste water equipment

Safety-Kleen Recycling and Recovery Services

Safety-Kleen provides many services to its customers that can help them meet waste minimization responsibilities through recycling and recovery.

Examples of Safety-Kleen's services are:

- * Safety-Kleen collects spent antifreeze, waste oil, and organic solvents and distills these to remove solids and contaminants. The waste material then becomes reusable for Safety-Kleen customers.
- * Safety-Kleen also fuel blends cleanup materials from hazardous waste spills and organic-based absorbent material and sludge from storage tank maintenance. Fuel

blenders who operate permitted facilities mix these wastes with fuel for energy generation.

Section 4.0

Identifying Waste Minimization Opportunities

Safety-Kleen management is encouraged to evaluate the following opportunities to establish a successful waste minimization program.

4.1 Understanding the Facility Processes

Safety-Kleen management assesses where hazardous waste is generated at a facility, what kinds of wastes are generated, and analyzes the processes associated with products or services. Management then determines which kinds of waste minimization techniques are feasible.

4.2 Knowing the Materials Used

Knowing what is used in a facility process is important in determining waste minimization options. Management considers whether:

- * A substitute to the material can be used.
- * The material quantity can be reduced.
- * Wastes can be introduced back into the process to reduce the amount of new materials used.

4.3 Training Employees and Education

Once management establishes a plan for waste minimization, employees must be trained in implementing it.

Training includes:

- * Explaining that waste minimization is important because it:
 - Protects the health of workers
 - Protects the environment
 - Meets regulatory requirements
 - Saves the Company money

- * Explaining the requirements of the work plan:
 - Who is responsible for the different parts of the plan
 - How facility processes will change
 - How the program will be monitored

- * Emphasizing management commitment to waste minimization
 - Checking with staff on the progress of the waste minimization program
 - Rewarding employees for waste minimization

Section 5.0

Understanding the Costs/Benefits of Waste Minimization

Safety-Kleen managers understand that waste minimization is required and that there are costs associated with waste minimization. However, there are also very significant benefits.

5.1 Cost to Facilities

The facility personnel who implement waste minimization evaluate their business and the alternatives available to them. The time spent performing this evaluation has a cost. In addition, if the facility substitutes materials or uses additional recycling services, there may be some cost associated with this.

5.2 Benefits of Waste Minimization

Waste minimization has many benefits. Safety-Kleen management emphasizes these benefits, as discussed below.

Economic Benefits

- * **Disposal Cost Reduction** - The costs of land filling and incinerating hazardous waste is increasing. Disposal options will become more costly and limited over time.
- * **Costly Alternative Treatments** - Certain waste streams will become more and more difficult to treat as disposal options become limited. Alternate technology to treat waste is expensive.
- * **Savings in Materials Cost** - When a facility practices waste minimization, it uses fewer materials. This reduces the cost of operating the business.

Regulatory Benefits

- * **Specific Requirements** - All generators of hazardous waste are required to minimize the waste they generate. Generators must demonstrate waste minimization when they sign a waste manifest, when they submit a biennial report under RCRA, or when applying for facility permits.

- * Land Ban - Since some waste is banned from land disposal, waste minimization avoids this regulatory limitation.

Liability Benefits

- * Generator Liability - RCRA established cradle-to-grave liability. Therefore, Safety-Kleen is responsible for managing wastes stored on-site at facilities, in transit, and when disposed of. Waste needs to be disposed of properly to avoid becoming a potentially responsible party for the cleanup of the contamination. Safety-Kleen must encourage employees to avoid liability by minimizing waste generation.
- * Potential Worker Safety - The U.S. Environmental Protection Agency and the Occupational Safety and Health Administration evaluate whether facilities are properly protecting their employees from hazardous materials and wastes found in the workplace. Safety-Kleen management minimizes potential employee exposure to hazardous waste by encouraging waste minimization.
- * Public Image Benefits - Safety-Kleen's ability to operate responsibly helps the Company obtain its customers' confidence. This is especially important when Safety-Kleen demonstrates to community members that its business is a safe and productive addition to the community.

Section 6.0

Characterization of Waste Generation

Safety-Kleen is including a Characterization of Waste Generation in the Waste Minimization Program.

6.1 Waste Generation Sources

This characterization is intended to identify the types, amounts, and hazardous constituents of waste streams, with the source and date of generation.

- The majority of the waste that is manifested from the service center (for which Safety-Kleen is indicated as the generator) is not actually generated by the Safety-Kleen service center. The majority of waste is generated by Safety-Kleen customers and is remanifested by Safety-Kleen to a processing facility. Also, much of the waste that is actually generated at the branch, such as residual sludge from the solvent bulking operations and spill residue, is mostly waste that was originally generated by Safety-Kleen customers.

- Waste reduction is an important part of Safety-Kleen's business. The heart of Safety-Kleen's business is waste reduction through recycling and reuse of wastes. The majority of the waste that Safety-Kleen handles is the primary feedstock for Safety-Kleen products. Waste that cannot be recycled but has a high BTU value is used as a supplemental energy source at one of three fuel blending facilities for cement kilns.

For these reasons, the requirements and intent of the Characterization of Waste Generation Report is not directly applicable to a Safety-Kleen Service Center. However, the following information is provided by Safety-Kleen to meet the requirements and the intent of the Characterization of Waste Generation Report.

6.2 Description of Waste Generating Activity

The Safety-Kleen Albuquerque, New Mexico Service Center is a permitted hazardous waste storage facility, and is also a large quantity generator. However, the Albuquerque, New Mexico Service Center does not actually generate the majority of the hazardous waste it manifests. The following is a brief description of Safety-Kleen operations:

- * **Parts Washer Service**--This service involves leasing, to automotive and industrial customers, a small parts cleaner machine. A parts cleaner machine consists of a DOT approved container of solvent, a sink and a circulating pump. The solvent is circulated every time the parts cleaner unit is used. Periodically, the container of spent solvent is replaced with a container of clean, recycled solvent. The spent solvent is returned to the service center and transferred into a bulk tank for storage. On a regular basis, the spent solvent is transported via tanker truck to a Safety-Kleen recycle center. The spent solvent is processed into clean recycled solvent and returned to the service center in bulk tankers for return to our parts washer service customer.
- * **Immersion Cleaner Service**--A second line of business is the Immersion Cleaner (IC) machine. Similar to the parts cleaner machine, it consists of a DOT approved container with IC and an agitating basket for difficult to clean parts. Periodically, the container of spent IC is replaced with clean IC. The spent IC is taken to the service center where it is stored with compatible wastes and transported in its original container to a recycle center.
- * **Dry Cleaning Service**--A third line of business is the dry cleaner service. Through this service, sales representatives pick up dry cleaning wastes, (filters, still bottoms, separator water) contaminated with dry cleaning solvents (usually perchloroethylene) in DOT approved containers. The waste is taken back to the service center where it is stored with compatible wastes and transported in its original container to a processing facility.
- * **Paint Waste Service**--A fourth line of business is the paint waste collection service. Through this service, Safety-Kleen provides its customers with a paint gun cleaner for auto body shops, etc. This machine features a reservoir of lacquer thinner for cleaning paint guns. Periodically, the spent solvent is replaced with clean product. The containers are brought back to the service center where they are stored with compatible wastes and transported in their original containers to a recycle facility for processing. Residual paint waste is also brought back to the service center to be sent for recycling.

- * **Waste Oil and Waste Antifreeze Service**--Another line of business is Safety-Kleen Oil Services. This service picks up used oil and spent antifreeze from oil change shops, repair garages or industrial customers. These wastes are picked up in a tanker truck or in containers, and returned to the service center. At the service center, they are transferred into storage tanks or placed in a storage area. The antifreeze is transported to an appropriate processing facility where it is recycled or reused. The used oil is transported to the Safety-Kleen re-refinery.

In each of these services, the waste is manifested from the customer to the service center. It is stored at the service center until sufficient quantities are accumulated. It is then manifested from the service center, with Safety-Kleen as the generator, to an appropriate processing facility.

6.3 Amount of Generated Wastes

A Safety-Kleen Service Center does generate some waste during its daily operations. The wastes generated at the facility include dumpster sludge, contaminated gloves, rags, etc from daily operations and spill residue. The following lists the total quantity of waste manifested from the service center in 1994.

1993 Annual Amount and Types of Wastes Generated

Total "Generated":

* Parts Washer Solvent	904,546 pounds
* Solvent(Dry Cleaning)	1,640 pounds
* New Immersion Cleaner(699)	27,199 pounds
* Old Immersion Cleaner(609)	90 pounds
* Lacquer Thinner/Paint Waste	84,245 pounds
* Dry Cleaning	
- Perchloroethylene	64,780 pounds
* - Freon	945 pounds
* Used Oil	(not terminated at this facility)

Wastes Generated at the Service Center:

- * Solvent Sludge 54,747 pounds

Source of Generation of Hazardous Wastes:

Of the wastes listed above, the solvent sludge and contaminated debris are the only waste actually generated at the service center. This waste can be attributed to the following sources:

- * **Dumpster sediment** is generated through the daily use of the return-and-fill station. Sediment accumulates in the dumpster from residue and debris which has collected in the containers of waste solvent received from our parts washer service customers. As the containers are emptied into the dumpster, a strainer catches the large objects and debris. In addition, any material that spills or drips into the secondary containment of the return-and-fill station is also cleaned up using sorbent materials. This waste is placed into containers and transported as a hazardous waste to an appropriate processing facility.
- * **Contaminated Rags, Gloves, etc.** are generated through the daily handling of various wastes mainly during the return-and-fill operations. Any objects contaminated by waste mineral spirits are containerized and handled as a hazardous waste.
- * **Spill residue** is generated when a spill occurs on a truck, at a customer's place of business or at the service center. The waste is cleaned using sorbent material. It is containerized and transported as a hazardous waste to an appropriate processing facility.

6.4 **Analysis of Technically and Economically Feasible Hazardous Waste Reduction Techniques for the Facility:**

- * Monitor return-and-fill operational procedures to ensure that spills and drips are minimized; thereby reducing the volume of spill cleanup wastes.
- * Reduce any excessive use of rags and gloves by the facility employees.
- * Encourage safe material handling and reduced incidents of spills.

Section 8.0

Identifying Other Informational Sources

Safety-Kleen management informs employees about other sources of waste management information.

8.1 Federal Government

The U.S. EPA provides businesses with assistance in waste minimization. Safety-Kleen and its customers can call the U.S. EPA RCRA/Superfund Hotline at (800) 424-9346.

In addition, the U.S. EPA publishes a number of guidance documents for pollution prevention and waste minimization. Safety-Kleen and its customers can obtain these guides through the U.S. EPA or the U.S. Government Printing Office (202) 783-3238.

8.2 State and Local Assistance

New Mexico Environment Department provides guidance for the Safety-Kleen Albuquerque facility. The phone number is (505)827-1558

In addition to the state, local agencies may have information. In general, Safety-Kleen and its customers can contact environmental agencies or health departments for reference to local agencies that deal with hazardous waste issues.

Section 9.0

Employee Involvement in Waste Minimization

The form in Example 9-1 is used for employee suggestions for waste minimization at Safety-Kleen facilities. This form is signed by the employee and reviewed by his manager before being submitted to the Environment Health and Safety Manager. A copy of the form is filed in EHS file 2010 - Waste Minimization.

Wherever possible, the employee includes cost justification savings that would result from implementation of the idea.

Regional Environmental personnel review ideas and refer them to upper management for possible implementation.

Figure 9-1 Waste Minimization Suggestion Submittal Form

Description of the procedure or process change suggested:
(attach additional pages and diagrams if needed)

Estimated capital cost of the change: \$ _____

Estimated annual expenses from the change: \$ _____

Estimated annual savings from the change: \$ _____

Employee Name

Manager Name

Signature

Signature

Title

Title

____/____/____
Date

____/____/____
Date

Branch Number