safety-kleen®

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APR 2003

April 23, 2003

Mr. James Bearzi
Permits Management Program
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Re: Notices of Deficiency (NOD) for Safety-Kleen Safety-Kleen Albuquerque Facility
Task # HWB-SKAL-02-001

Dear Mr. Bearzi:

Safety-Kleen Systems, Inc. (S-K) operates a service center in Albuquerque, NMD 000 804 294, for temporary accumulation and storage of hazardous wastes, prior to transporting offsite for reclamation, treatment or disposal. RCRA Permit Renewal Applications were submitted to the New Mexico Environment Department/Hazardous Waste Bureau (NMED/HWB).

In a letter (Notice of Deficiency) dated February 12, 2003, NMED/HWB required additional information. A response to the NMED/HWB NOD and the required information is provided with this correspondence. Each of the NMED/HWB items is summarized below for convenience. A response providing the supplemental information follows each of the NMED requests.

NMED/HWB Item No. 1.

Part A, Section III and IV, Page 1 of 7 – has two different zip codes for the same address.

S-K Response No. 1.

This error is corrected to read 87107 in a revised submission of Form 8700-23. That form requires the signature of a responsible corporate official. That person is Lin Longshore, Safety-Kleen Senior Vice President of Environmental Compliance. The form will be supplied to NMED immediately upon completion.

NMED/HWB Item No. 2.

Part A, Section X, Page 2 of 7 – If this section is not applicable then insert "NA".

S-K Response No. 2.

This error is corrected by the submission of a revised Form 8700-23.

NMED/HWB Item No. 3.

Part A, Section XIII, Page 4 of 7 – If this section is not applicable then insert "NA".

S-K Response No. 3.

This error is corrected by the submission of a revised Form 8700-23.

NMED/HWB Item No. 4.

Please submit an updated Part A of the Application for Hazardous Waste with the correct signatures (for example, owner and operator).

S-K Response No. 4.

This error is corrected by the submission of a revised Form 8700-23.

NMED/HWB Item No. 5.

Please supply the date of the photographs in the permit application.

S-K Response No. 5.

Due to changes in personnel at Safety-Kleen and at TriHydro (engineering firm that assisted Safety-Kleen in this permit application) the exact dates of the photographs could not be determined. Photographs are being repeated on April 15, 2003 and will be submitted the same day via e-mail. Additionally, hard copies of the photographs will be mailed to NMED. The photographs will show the same views as those currently in the permit application.

NMED/HWB Item No. 6.

The photographs do not show all container storage units. Please submit photographs representing all container storage units.

S-K Response No. 6.

Current photograph 2 shows the "entrance to west container storage unit". There are actually two Container storage units within this building. Two additional photographs will be submitted as described in 5 above to show these container storage units within the building.

NMED/HWB Item No. 7.

Please verify if any drinking water wells are within ¼ mile of the facility.

S-K Response No. 7.

There are no known drinking water wells within ¼ mile of the facility.

NMED/HWB Item No. 8.

Please provide which Safety-Kleen handled wastes are stored in the flammable storage building.

S-K Response No. 8.

Containerized materials that carry the DOT hazard class 3 label for transportation are stored in the flammable storage building. Additionally, containerized materials with the proper shipping description, "combustible liquid, nos" though excepted from the DOT labeling requirement are stored in the flammable storage building.

NMED/HWB Item No. 9.

State whether tank sediments are stored at the facility after they are removed from the storage tank.

S-K Response No. 9.

The following statement has been added to the permit application in section A.1.1.b: "The tank bottom sediment is then stored at the facility as a facility generated waste."

NMED/HWB Item No. 10.

Please indicate where the used aqueous parts cleaning solvent is stored.

S-K Response No. 10.

The following statement has been added to the permit application in section A.1.1.d: "If not bulked, the aqueous parts washer solvent is stored in either the east or west container storage area."

NMED/HWB Item No. 11.

Please specify for each piece of equipment. Whether the equipment contains or comes in contact with hazardous waste with organic concentration equal to or greater than 10%.

S-K Response No. 11.

The following statement has been added to the Subpart CC Compliance Plan indicating that all equipment containing or in contact with 500 ppmw or greater waste also is in contact with or contains 10% or more organic content: "In the same manner, these same wastes have been determined to have greater than 10% organic content by weight."

NMED/HWB Item No. 12.

Please provide the description of each waste processed at the facility as well as the Safety-Kleen product number for that waste in this attachment. The product names are listed in Attachment C-2 with no evident correlation to the waste described in Attachment A.

S-K Response No. 12.

Footnotes have been added to the Attachment C-2 table of Safety-Kleen products indicating which wastes they contribute to. It is not practical to provide the Safety-Kleen number (SKDOT) for wastes. SKDOT numbers trigger manifesting and LDR requirements. Hence, when recharacterization indicates changes required in LDR or manifesting, the SKDOT will change to trigger the correct requirements.

NMED/HWB Item No. 13.

At least once per day, the owner or operator will inspect the data gathered from monitoring and leak detection equipment.

S-K Response No. 13.

Daily, the leak detection and monitoring equipment measures the volume of material in each tank. That information is recorded on the daily tank inspection form. Once per week when the tank has been allowed to quiet and when the tank will not be disturbed, the leak detection equipment performs an additional four-hour test. The results of each of those tests attached to the inspection forms and is a part of the facility operating record.

NMED/HWB Item No. 14.

The leak detection shall be inspected on a daily basis.

S-K Response No. 14.

Daily, the leak detection and monitoring equipment measures the volume of material in each tank. That information is recorded on the daily tank inspection form. This information is used to show that the amount of material in the tank reconciles with the record of the amount of material in the tank, thus allowing potential leaks to be detected.

NMED/HWB Item No. 15.

Documentation of tank inspections shall be incorporated into the facility operating log.

S-K Response No. 15.

Facility inspections are a part of the operating log and verbiage has been added to Section C-1 stating explicitly so.

NMED/HWB Item No. 16.

Please provide the depth of the secondary containment structure for the return and fill station.

S-K Response No. 16.

Please refer to drawing, "Return & Fill Shelter Plan, Section and Details" (Detail C), in Section E of the permit application to see that the grating (working surface) is 2 feet 3¾ inches above the top of the curbing. See also the bottom right corner of "Section A-A" and "South Elevation" on the same drawing to see that the curbing height is 6 inches.

NMED/HWB Item No. 17.

Please provide information as to how the facility prevents run-off from hazardous waste handling areas.

S-K Response No. 17.

Storage areas are roofed, and bermed to prevent run-on. Containment in these areas is sufficient to contain spills. Thus, run-off is prevented. Some containers are unloaded outside storage and return and fill areas. Containers of hazardous waste meet DOT requirements, reducing the chance of a release outside of containment. Were there a release outside of containment, the contingency plan would be immediately implemented, preventing run-off.

NMED/HWB Item No. 18.

Please provide copies of the contingency plan transmittal letters to local authorities, hospitals, and any emergency response teams that may be called upon to provide emergency services.

S-K Response No. 18.

Please see attached.

NMED/HWB Item No. 19.

Please submit documentation that the facility training program complies with 40 CFR 264.16(d)(3).

S-K Response No. 19.

A more descriptive training outline meeting these requirements is attached.

NMED/HWB Item No. 20.

Please submit a written description of the type and amount of continuing education given to each employee

S-K Response No. 20.

An abbreviated list of the continuing education provided to employees is contained in the following table. The training is job specific. For example, an administrative person will not be trained in rail tank car operations. Please see also the attached outline.

Course Description	Class Frequency	Class Duration
US DOT Regulations: Hazardous Materials Regulations Refresher	Tri-Annual or more often when needed	At least One Hour
US EPA Regulations: Annual RCRA Update	Annual or more often when needed	At Least Two Hours
Cargo Tank Operations Refresher	Tri-Annual or more often when needed	At Least Four Hours
Driver Function Specific Training	Tri-Annual or more often when needed	At Least Eight Hours
Drum Inspection and Closure	Tri-Annual or more often when needed	At Least Two Hours
Rail Transportation: Non-Pressurized Tank Car	Annual or more often when needed	At Least Seven Hours

HazWOpER Refresher	Annual or more often when needed	At Least Eight Hours
Forklift Safety Performance Evaluation	Tri-Annual or more often when needed	At Least Two Hours

NMED/HWB Item No. 21.

Please provide an estimate of the maximum amount of waste ever on site over the life of the facility.

S-K Response No. 21.

The facility capacity from the waste analysis plan is an estimate of the maximum amount of waste ever on site over the life of the facility. Verbiage describing this exists in the abstract of the closure plan.

NMED/HWB Item No. 22.

The facility must provide means for post-closure care of the facility.

S-K Response No. 22.

The facility will complete closure leaving a clean site. If the closure plan cannot achieve a clean closure, the closure plan will be modified to achieve clean closure.

NMED/HWB Item No. 23.

Provide detailed steps taken to remove or decontaminate all hazardous wastes and residues, system components, structures, methods of soil testing, and for determining the extent of contamination during partial and final closure.

S-K Response No. 23.

The closure plane has been changed to meet these requirements.

NMED/HWB Item No. 24.

Include a closure schedule.

S-K Response No. 24.

That schedule is enclosed.

NMED/HWB Item No. 25.

Safety-Kleen Shall prepare an updated Closure cost estimate.

S-K Response No. 25.

That estimate is attached.

NMED/HWB Item No. 26.

Safety-Kleen shall submit a copy of an insurance policy as required in 40 CFR 264.147(a)(1)(I).

S-K Response No. 26.

A copy of that policy has been submitted to the department within the last two months. A copy is enclosed.

NMED/HWB Item No. 27.

Safety-Kleen shall submit a wind rose for the area surrounding the facility.

S-K Response No. 27.

A wind rose has been ordered from the National Weather Service contractor. Immediately upon Safety-Kleen's receipt of that wind rose, it will be supplied to the department.

NMED/HWB Item No. 28.

Safety-Kleen shall provide information on injection and withdrawal wells on site and within 1000 feet of the site.

S-K Response No. 28.

There are no known injection wells on site or within 1000 feet of the facility. The permit application has been modified to indicate this.

NMED/HWB Item No. 29.

Attachment E, page E-4 – In the second paragraph please provide clarification as to where the 7.5' measurement is taken from.

S-K Response No. 29.

The three references to 7.5' appear to be typographical errors. They have been removed.

NMED/HWB Item No. 30.

Safety-Kleen shall address the prevention of run-on to container storage areas.

S-K Response No. 30.

As mentioned in 17, above, run-on to container storage areas is prevented by the structures (walls, roofs, and elevation above surrounding grade. The permit application has been modified to make this statement. See first paragraph, page E-3.

NMED/HWB Item No. 31.

Safety-Kleen should include applicable sections of 40 CFR 264.1089 (a) and (b) in the operating record.

S-K Response No. 31.

Safety-Kleen does comply with 40 CFR 264.1089(a) and (b). Please see the existing Subpart CC Compliance Plan and other relevant parts in the permit application

NMED/HWB Item No. 32.

Safety-Kleen shall provide the locations of each piece of equipment subject to the requirements of 40 CFR Subpart BB

S-K Response No. 32.

A map of the facility showing the location of each piece of equipment subject to Subpart BB requirements. That map is a part of the facility inspection forms and a copy is attached.

NMED/HWB Item No. 33.

Safety-Kleen shall state in how it intends to comply with the requirements of 40 CFR Subpart BB as they pertain to equipment inventory for inspections.

S-K Response No. 33.

Please see 32, above and the permit application section C.3.

NMED/HWB Item No. 34.

Safety-Kleen will supply provide documentation of compliance with 40 CFR 264.1052 through 40 CFR 264.1059.

S-K Response No. 34.

The Safety-Kleen Solvents Vapor Pressure Summary table in the Subpart CC Compliance Plan in the Permit Application demonstrates that the applicable wastes are not light liquids. Hence, 40 CFR 264.1052 does not apply. There are no compressors in Safety-Kleen's facility. 40 CFR 264.1053 does not apply. For compliance with 40 CFR 264.1054, please see the Subpart CC Compliance Plan, fourth paragraph in the "tanks" section. The Safety-Kleen equipment does not include any sampling connection system. 40 CFR 264.1055 does not apply. All open ended valves and lines are plugged or have a second valve, in compliance with 40 CFR 264.1056. the Safety-Kleen equipment includes no valves in gas / vapor service or in light liquid service. 40 CFR 264.1057 does not apply. All pumps, valves, flanges, and other connectors are inspected daily. If any leak or potential leak is discovered, 40 CFR 264.1058 requirements will be met (including the delay of repair requirements in 40 CFR 264.1059, if necessary).

If you have any questions, comments, or concerns, please contact me (602-821-2422) or Mike Crawford (505-884-2277).

Sincerely,

David Ashley
EHS Manager
Safety-Kleen Corporation

Enclosures

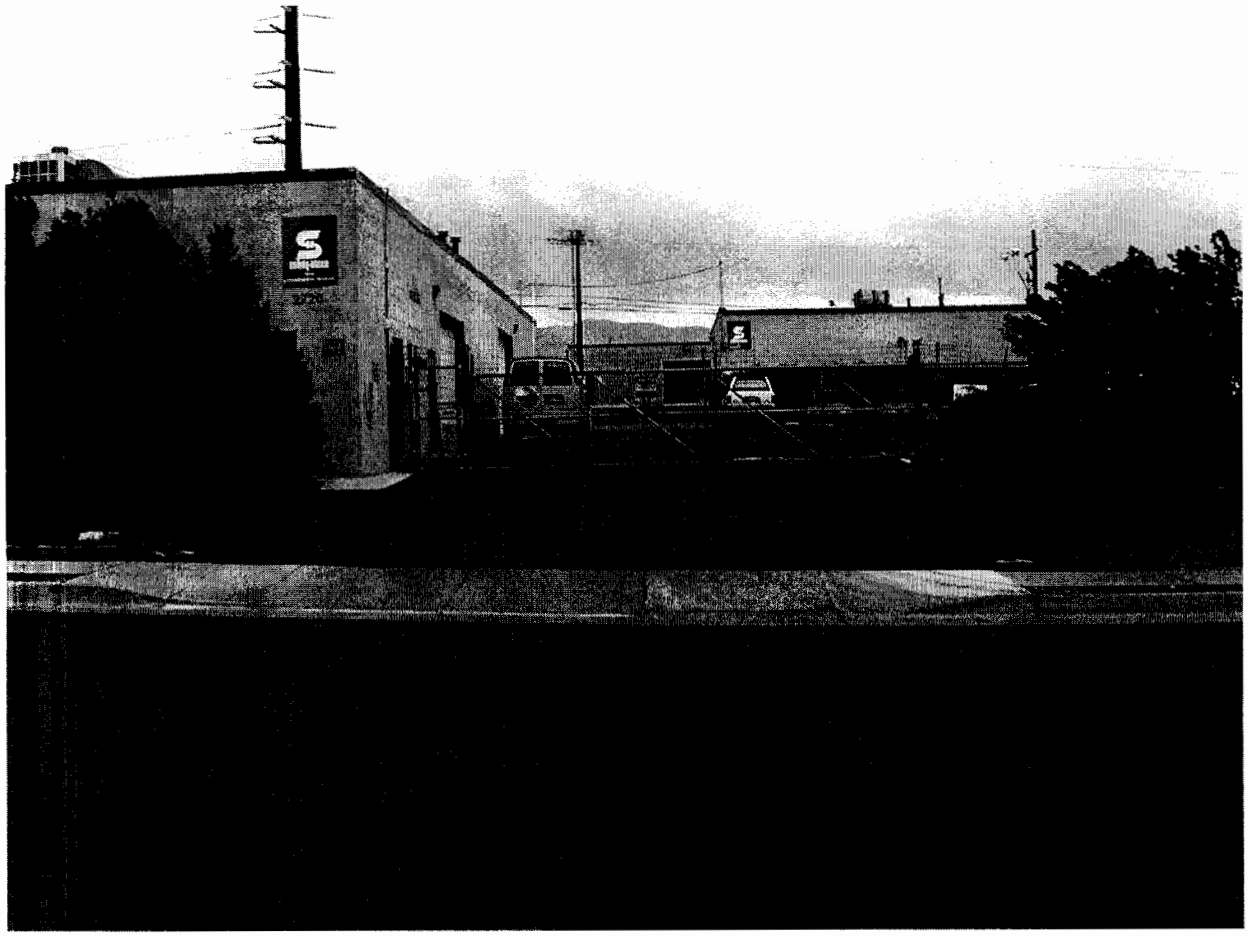
cc: File
Robert Warder, NMED
Mike Crawford, Safety-Kleen
Steve LuQuire, Safety-Kleen

Return & Fill
Photographs facing SSE
April 15, 2003 DD

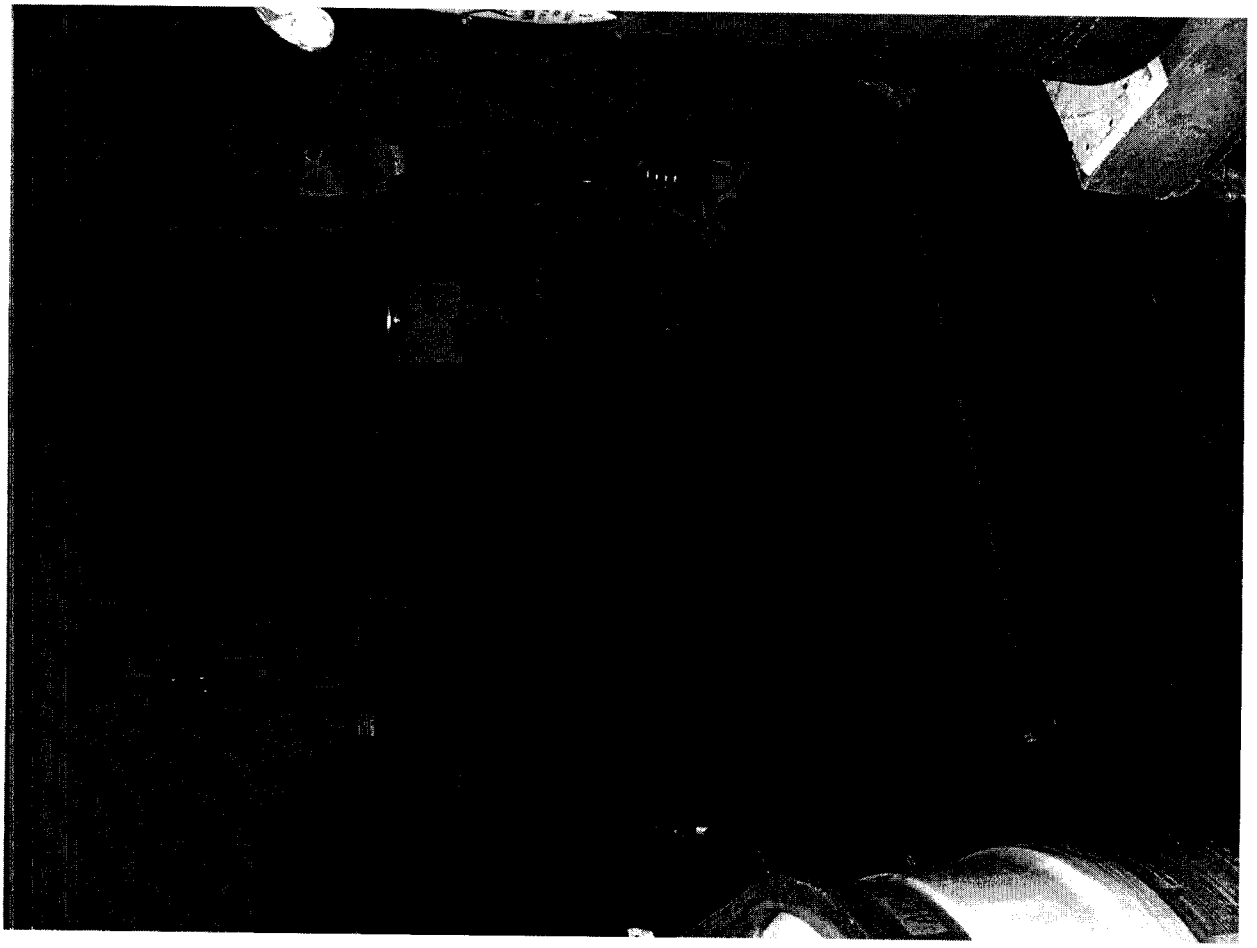
Container Storage Building
Photographer facing SSW
April 15, 2003 DA

Flammable Storage Building
Photographer facing ESE
April 15, 2003 DA

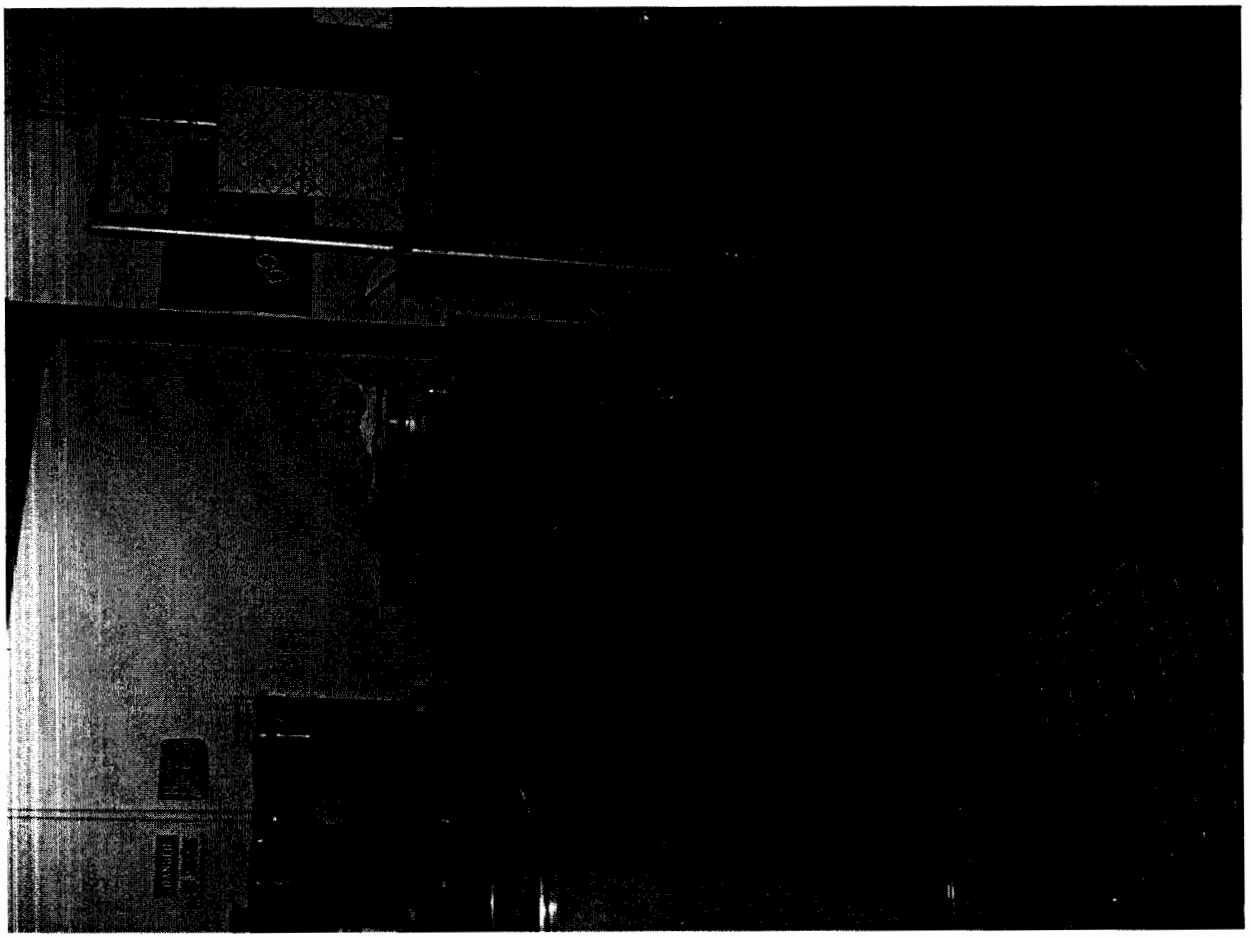
Return & Fill on the South side of the Flammable Storage Bldg.
Photographer facing ~~NNE~~ ENE
April 15, 2003



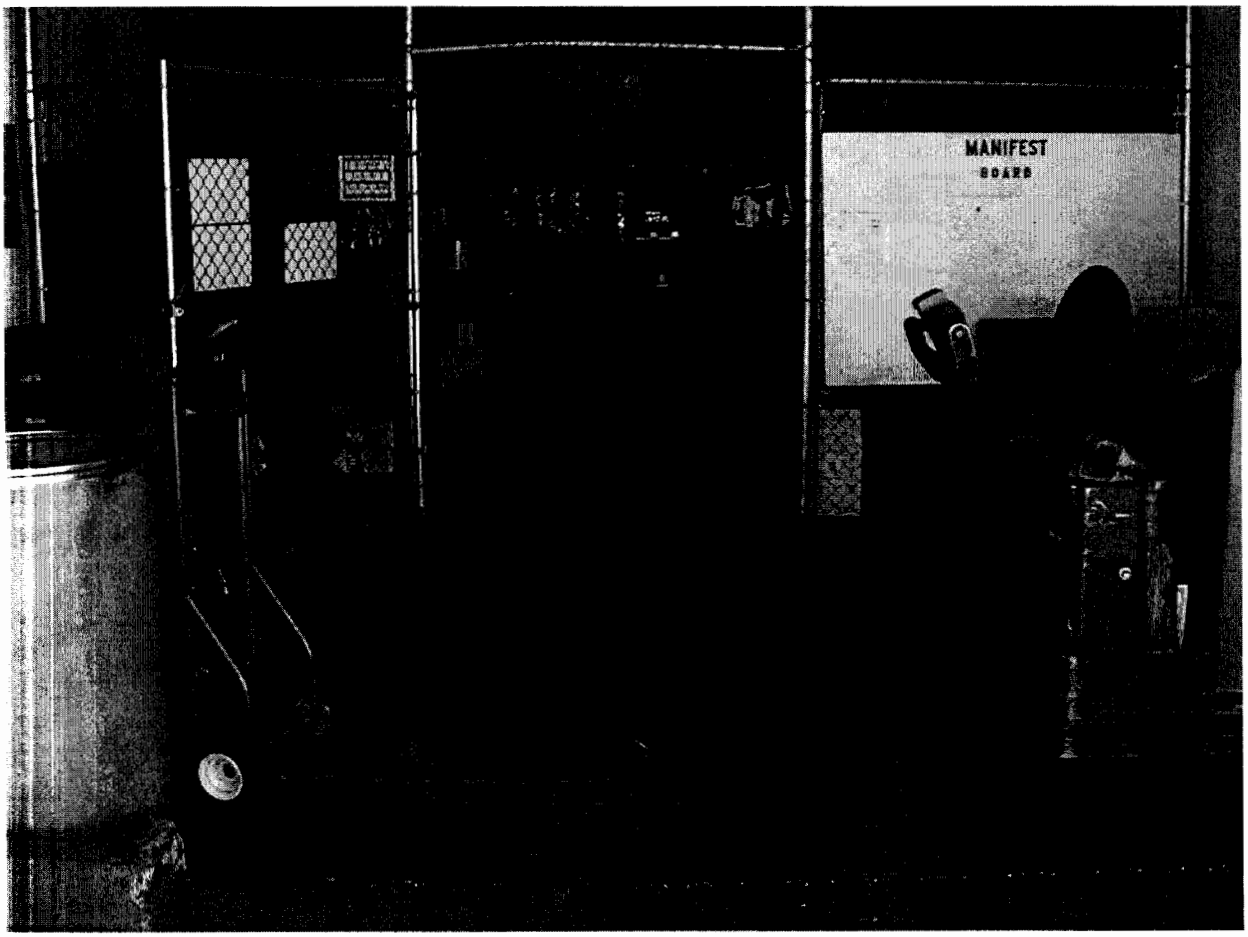
Safety-Kleen facility from across Girard
Photographer facing E
April 15, 2003



Area between East and West Container Storage Areas
Photographer facing WNW
April 15, 2003



East Container Storage Area
Photographer facing ESE
April 15, 2003 DP



West Container Storage Area
Photographer facing S.
April 17, 2003 DF

PROJECT 023-001

STORAGE FACILITY

PERMIT APPLICATION

SAFETY-KLEEN SYSTEMS, INC. SERVICE CENTER

ALBUQUERQUE, NEW MEXICO

NMD 000804294

January 29, 1992

Revised: September 1994

Revised: July 25, 1996

Permit Renewal Application: July 27, 2001
Amended: April 23, 2003 (D. Ashley)

Prepared for:

Safety-Kleen Systems, Inc.

by:

TriHydro Corporation
920 Sheridan Street
Laramie, Wyoming 82070

CERTIFICATION STATEMENT

Albuquerque, New Mexico Service Center

NMD 000804294

The undersigned, being an authorized representative of Safety-Kleen Systems, Inc. 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.

Mike Crawford
Branch Manager

Date

ATTESTATION

The undersigned, attesting witness to the Certification Statement and this document dated July 27, 2001 (amended April 23, 2003), of which this affidavit is a part, states that I am personally responsible for the preparation of the document, that I personally gathered or reviewed the information contained herein, and further that the information, to the best of my knowledge and belief is true, accurate, and complete.

David Ashley
Environmental, Compliance Manager

Date

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1.0 FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS:	Safety-Kleen Systems, Inc. 1301 Gervais Street Columbia, South Carolina 29201 (803) 933-4200
RESPONSIBLE OFFICIALS:	Mike Crawford Branch Manager
FACILITY ADDRESS:	Safety-Kleen Systems, Inc. 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 Systems, Inc. 1301 Gervais Street Columbia, South Carolina 29201 (803) 933-4200
DATE OPERATIONS BEGAN:	March 1, 1977

DESCRIPTION OF ACTIVITIES

This facility is an accumulation point for used 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 used 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	Used Solvent (D001) and the codes listed in note 2 below)
West Container Storage Warehouse	4,310	431	Used Immersion Cleaner codes listed in note 2 below) Dry Cleaning Waste (F002 and the codes listed in note 2 below) Used Solvent (and the codes listed in note 2 below) Photo/Imaging Wastes - D011[3]
East Container Storage Warehouse	2,680	268	Used Immersion Cleaner (F002, F004, and the codes listed in note 2 below) Dry Cleaning Waste (F002 and the codes listed in note 2 below) Used 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), used solvent and dumpster sediment

Notes: 1. Secondary containment consists of a double-walled tank and leak detection system.
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, D038, D039, D040, D041, D042, and D043
3. Photo/Imaging wastes may not be considered a hazardous or solid waste if the hazardous constituent (silver) is reclaimed.

1.0 FACILITY DESCRIPTION

1.1 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Systems, Inc. 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.

Currently, Safety-Kleen offers several services, which involve the accumulation and storage of used solvent at the Albuquerque service center. Periodically, these wastes are shipped from the service center to a Safety-Kleen recycle center or to an independent reclaimer. The wastes are processed and generally are then returned to customers as usable product. Two-thirds of the solvent used by Safety-Kleen customers has been reclaimed with the remainder being purchased from a vendor. A unique feature of the solvent recycling 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 when it is in use at the customer's place of business. A description of typical services Safety-Kleen provides its customers is provided below.

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a container meeting DOT specifications and contains solvent. On a regularly scheduled basis, a Safety-Kleen service representative cleans and inspects the parts washer machine and replaces the drum of used solvent with one of clean product. Each service 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. Used solvents are poured into the dumpster/drum washer in the return and fill station. It is then pumped into the storage tank for used solvent. Periodically a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the used solvent at the service center.

Safety-Kleen also provides an aqueous-based parts washer solvent to its customers. The aqueous-based solvents are also delivered and picked up from customers' locations in containers. Once returned to the service center, containers of used aqueous-based solvents may be poured into the drum washers/dumpsters in the return/fill station and transferred to the waste storage tank, or stored in the original container and placed in the drum storage area. Aqueous-based solvents may also be bulked in larger containers and placed in the drum storage area. Aqueous-based solvents are also processed at a Safety-Kleen recycle center or contract reclaimer, where used aqueous-based solvents are recycled into useable product.

Another 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 used solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse. Periodically, a box trailer truck is dispatched from a recycle center to deliver containers of fresh solvent and collect the containers of used immersion cleaner solvent for reclamation.

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 used solvent is stored in the same manner as the waste solvent collected from the leased parts cleaner machines. The service representative then refills the customer-owned machine with Safety-Kleen solvent via a pump. The waste solvent handling and management procedures from customer-owned machines are consistent with those for Safety-Kleen solvents.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are drummed on the customer's premises and are periodically collected by a service 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.

1.1.3 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 service 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.

1.1.4 Imaging/Photochemical Service

Imaging waste consists typically of three waste streams. Photo fixer solution is used to etch photo film during processing. This material is characteristic for silver (D011). Safety Kleen is able to recover the hazardous constituent from the photo fixer solution. Used photo developer is an aqueous solution used to neutralize the etching effects of the photo fixer. This material exhibits no hazardous characteristics but may not be discharged into public wastewater treatment system in some communities. Silver collection canisters are sent to a recycle center for silver reclamation. These canisters do not meet the definition of a solid waste per 40 CFR 260.30(c) and are managed as a non-regulated material.

The Imaging/Photochemical wastes are placed in containers at the customer's place of business. Several of these wastes are not considered hazardous or solid wastes because the hazardous constituent may be reclaimed. However, the service representative collects these containers and stores them in the container storage area of the warehouse. The imaging/photochemical wastes are then re-manifested and periodically sent to a Safety-Kleen recycle center, contract reclaimer or other permitted treatment facility.

1.2 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 containerized areas (east and west) for drum storage;

b. two 12,000 gallon underground storage tanks for clean and used solvent;

c. a solvent return and fill station with a loading dock; and

d. one enclosed building used for flammable storage.

Descriptions of the surrounding area of the service center follow. Applicable maps and site plans are presented at the end of this section.

1.2.1 Regional Description

The Albuquerque, New Mexico Service Center is located in Barnalillo 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 within a 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 Boulevard. 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, gas, injection, or withdrawal 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 (Figure 1). 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 Boulevard, 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.

This permit application has been organized using a format similar to the previously approved permit application to maintain consistency. The remaining sections of this permit application (Waste Analysis Plan, Security Measures, Inspection Plan, etc.) are included in attachments A through H. Information relevant to each of the specific attachments is presented at the end of each attachment, and separated by cover pages.

ATTACHMENT A

WASTE ANALYSIS PLAN

WASTE ANALYSIS PLAN

ABSTRACT

Waste Description	EPA Waste Code No.	Facility Capacity[1] (gallons)	Annual Amount[2]
Used Solvents	D001[3]	12,000	143
Tank/Dumpster Bottom Sediment	D001[3]	N/A	3
Used Immersion Cleaner	See Below[3]	6,990	3
Dry Cleaning Waste	F002[3]	Included with Used Immersion Cleaner	6
Used Solvent (aqueous)	See Below[3]	Included with Used Immersion Cleaner	3
Paint Waste	D001, F003, F005[3]	9,650	14
Photo Chemical Wastes	D011	Included with Used Immersion Cleaner	3

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1 The facility capacity is in gallons.

2 The annual amount is in thousands of gallons.

3 and may include D004, D005, 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.

WASTE ANALYSIS PLAN

A.1 DESCRIPTION OF WASTES

Several 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 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 and qualitative descriptions follow.

A.1.1 Wastes Resulting From the Parts of Washer Service

Used solvents from parts washers is accumulated in a 12,000 gallon underground, double-walled storage tank via the return and fill station. Containers of used 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 several types of solvent waste:

a. Used solvent - The used 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 may exhibit the toxicity characteristic of 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 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 generally used for this purpose. The sediment is ignitable (D001) and may exhibit the toxicity characteristic of 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 tank bottom sediment is then stored at the facility as a facility generated waste.

c. Dumpster Sediment - Sediment may also accumulate in the drum washers in the return/fill station. The sediment is manually removed and placed in containers. The dumpster sediment is representative of the waste codes described in items a and b above.

d. Used 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 used solvent tank. If not bulked, the aqueous parts washer solvent is stored in either the east or west container storage area. It may be toxic using the toxicity characteristic of 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.

e. Immersion Cleaner - is a different type of solvent that is not placed in the underground storage tank. Containers of immersion cleaner typically remain in the drum in which it was originally used until it is received at the recycle center. Drums are placed in the drum storage area of the warehouse and are stacked no more than two-high in the drum storage area of the warehouse.

The immersion cleaner is a non-halogenated hydrocarbon mixture and may exhibit the toxic characteristics of 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.1.2 Wastes Resulting From the Dry Cleaner Service

Dry cleaning wastes consist of used 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 may be toxic as per 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 wastes are 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.1.4 Photographic/Imaging Wastes

Some photographic imaging wastes managed by the facility are not solid wastes per 40 CFR 261.2(c) because their hazardous constituent is reclaimed. Others are managed under the provisions of Subpart F of 40 CFR 266 – Recyclable Materials Utilized for Precious Metals Recovery. Imaging waste consists typically of three waste streams. Photo fixer solution is an aqueous solution used to etch photo film during processing. This material is characteristic for silver (D011). Safety-Kleen is able to recover the silver from the solution. Used Photo developer is an aqueous solution that exhibits no hazardous waste characteristics but may not be allowed to discharge into public wastewater treatment systems in some communities. Silver collection canisters are sent to a recycle center for reclamation. These canisters do not meet the

definition of a hazardous waste as per 40 CFR 260.30(c) and are managed as a non-regulated material.

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 used solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects used solvents from approximately 1,100 customers, most of who are small quantity generators, and an estimated 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 a 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 as described in Section A.2.1. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

However, in accordance with HWMR 206.B.3, 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 conducted. If a container with questionable contents is returned to the service center, a sample will be taken and analysis will be performed at the recycling center, Safety-Kleen Tech Center (Elk Grove Village, Illinois) or other qualified lab according to the procedures outlined in Section A.3 of this attachment. The Branch Manager will be notified of any contamination that may have occurred.

Safety-Kleen trains personnel to verify the physical characteristics of the wastes at several points in the management of the solvent. These procedures are described briefly 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 <u>only</u> collected from dry cleaner shops);

3. Determining the customer's type of business (i.e., the SIC code is recorded) and the purpose for which the customer will use the machine;

4. Training customers to use the machines properly;

5. Training employees to inspect the physical characteristics of used solvent and determine whether it is acceptable;

6. When waste is collected from a customer, indicate on the service document whether the used solvent meets Safety-Kleen's acceptance criteria;

7. Marking each container with the customer's name, address, and EPA I.D. number (if available). This information remains on containerized waste until it is accepted at the reclamation facility;

8. Keeping a record of each incoming and outgoing shipment in the operating log; and

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 available); 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 or similar sampling device to ensure representative samples. The sample 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., semi-volatile organic compounds, PCBs, etc.).

The laboratory sends waste analyses results to the service center. If through the additional analysis the waste is determined to be acceptable at the branch, it will be relabeled, manifested and then managed with the other wastes. If it is determined through the additional analysis to not be acceptable, the waste will either be: (a) managed at the Service Center 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 analytical results from the additional characterization analysis will be used to appropriately manage the waste. The Branch Manager has the right to refuse any further service to a business which has returned waste that does not meet acceptable criteria.

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 inspection procedures allow Safety-Kleen to ensure that the waste being picked up meets appropriate acceptance criteria.

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 to determine whether the waste has been contaminated; or (2) reject the 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 collect a sample, 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 initially involves analyzing the suspect waste for flash-point and the presence of volatile organic compounds. Pending those results, additional constituents may also be analyzed. 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 on a ten-day transfer basis.

b. Waste Specific Criteria:
The following is a description of the specific acceptance criteria for each waste stream.

1. Used solvent:

The acceptance criteria for determining by visual inspection whether used solvent has been contaminated are volume, odor and color, the most significant of which is volume. If the volume of waste in a given drum exceeds the specified level, the Safety-Kleen service representative will conduct an inquiry of the customer's operation and handling procedures. Contingent on the customer's responses, the solvent may be accepted, a sample of the waste may be collected for laboratory testing as described above, or the waste may be rejected.

In addition to the volume criterion, the odor of the used solvent may typically indicate whether the waste has been contaminated. Used solvent has a distinctive odor. The service representatives are expressly instructed not to deliberately sniff the waste. However, if the solvent has been contaminated the service representative may notice a difference in the odor when he services the machine.

The used solvent is also visually inspected for its color. Unused solvent typically 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 used 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:

The criteria for the inspection of used immersion cleaner are volume and color. 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. If the used 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.

3. Dry Cleaner Wastes:

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

a. Used Filter Cartridges:
Used 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". 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 where by 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 overfill 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 Colliwasa or similar sampling device into the drum. The sampling device 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 a Class 4 flammable waste.

5. Photographic/Imaging Waste

Photographic/Imaging waste is collected from facilities where one process is managed and the possibility of cross contamination is minimal. The sales representative inspects the contents of the containers of photographic/imaging waste when the sales representative services the customer. The pH and silver content of the waste is checked at the time of service, and the waste is also inspected visually.

A.3 WASTE ANALYSES AT THE RECYCLE CENTER

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure a product quality. The following section summarizes the waste analyses practiced at the recycle center for the hazardous materials returned form the Albuquerque branch. For each waste type stored at the branch, at least the following analyses must be performed annually (annual re-characterization analysis). If a particular waste stream is not managed at the service center during the previous year, no re-characterization analysis is performed. Copies of the results for the annual analyses must be maintained at the branch office for the life of the permit. A copy of the most recent re-characterization analysis is contained in Attachment A-1.

A.3.1 Solvents

- Flash point (must be greater than 90°F).

If the flashpoint is unacceptable, the Albuquerque 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:

- Volatile Organic Analysis, using EPA Methods 8015, 8021, 8260, or approved equivalents.
- Physical appearance, including bottom sediment and water content
- Specific gravity

- pH
- Distillation performance

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

In addition to the tests listed above, which will be performed on a representative sample from every load received at the recycle center from the Albuquerque service center, a full Toxicology Characteristic Leaching Procedure (TCLP) analysis for all 40 constituents, (except for pesticides and herbicides) will be performed at least once each calendar year.

A.3.2 Solvent Tank Bottom Sludge and Free Water

- Flash point (Must be greater than 90°F).
- Analysis for content of lead, cadmium, and chromium.
- pH

As described above for solvent, a full TCLP analysis (except for the pesticides and herbicides) will be performed on a representative sample at least once each calendar year.

A.3.3 Immersion Cleaner Solvent

Containers of waste immersion cleaner are typically characterized at the recycle center using the following criteria:

- Flash point
- Physical appearance
- Specific gravity
- Percent water
- Volatile Organic Analysis (using EPA methods 8015, 8021, 8260 or approved equivalents)

If any of these tests yield unacceptable results or indicate solvent contamination outside the normal range, the Branch Manager will be notified immediately. As described above, a full TCLP test (except for pesticides and herbicides) 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 Perchlorothylene (using EPA methods 8015, 8021, 8260 or approved equivalents)
- Specific gravity

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

As described above, a full TCLP test (except for pesticides and herbicides) will be performed on a representative sample of dry cleaning waste at least once each calendar year.

A.3.5 Paint Waste

Paint wastes are generally characterized at the recycle center using the following criteria:

- Metals
- Flash points
- Physical appearance
- Specific gravity
- Percent water
- Volatile organic analysis (using EPA methods 8015, 8021, 8260, or approved equivalents)

As described above, a full TCLP test (except for pesticides and herbicides) will be performed on a representative sample of paint 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 typically the responsibility of the Safety-Kleen corporate or regional compliance offices.

A.5 LAND BAN NOTIFICATION/CERTIFICATION FORMS

In accordance with 40 CFR 268.7(a)(2), Safety-Kleen provides a one time written notice for wastes banned for land disposal with the initial shipment. No further notification is necessary unless the waste changes. Safety-Kleen will provide the written notice 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., parts washer solvents, immersion cleaner, dry cleaning wastes, etc); 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 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. 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; and

10. The land ban notices and requirements. These records are kept on file at the facility.

A.7 WASTE DETERMINATION FOR SUBPART BB AND CC COMPLIANCE

For purposes of waste determination, this facility utilizes knowledge of the wastes described in Section A.1, A.2 and A.3 above. For those hazardous wastes which are managed on a transfer basis, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all wastes managed in tanks or containers at this facility may display an average volatile organic concentration of greater than 500 ppmw at the point of waste origination. Documentation of this knowledge is provided in Attachment A-1 (waste characterization analytical results), as required in 40 CFR 264.1063(d) and 264.1083. Therefore, hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

ATTACHMENT A-1

ANNUAL RE-CHARACTERIZATION DATA

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. 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 sensoring 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 during non-operating hours. As a result the tanks and container storage areas are accessible only 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 PLAN

INSPECTION PLAN

C.1 INSPECTION PROCEDURES

The Service Center Manager (i.e., Branch Manager) or designate is responsible for carrying out and documenting the facility inspection (example inspection forms are in Attachment C-1). The inspections are performed each operating day. He must note any repairs that are needed and assure that they are completed. If the repairs cannot be implemented by onsite personnel, the Technical Services Department at Safety-Kleen's corporate headquarters must be notified for assistance. Completion of repairs must also be documented on the inspection form.

The Environmental Compliance Manager or other regional or corporate personnel responsible for compliance issues reviews the Facility Inspection Record with the Branch Manager periodically to insure that they are properly completed and that any necessary repairs have been conducted.

The facility inspection is documented on inspection forms, which are part of the facility operating record, and includes the following:

a. Tank Inspections --At a minimum, the tanks holding the solvent product and used solvent are inspected each operating day. The inspections include checks of the high level alarm, 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 used solvent is 85% full, a pickup must be scheduled with Safety-Kleen's corporate dispatch department. The solvent must not exceed 95% of the tank volume at any time. The tanks are also inspected to comply with Subpart CC requirements.

   A liquid sensing leak detector is between the two walls (secondary containment) of the tanks and the recorder chart must be checked daily. 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 each operating day. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked before use for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired. The dispensing equipment is also inspected to comply with Subpart BB requirements.

c. Drum storage areas--The drum storage area is inspected each operating day and the number and condition of the drums noted. Container inspections are also conducted to comply with Subpart CC requirements. The total volume of the used 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. The drums must be properly labeled and marked in accordance with U.S. DOT, EPA and New Mexico hazardous waste regulations. The secondary containment systems must be inspected for deterioration on failure. If cracks or leaks are detected, they must be repaired immediately.

d. Route vehicles--Each route vehicle must be inspected prior to use to insure proper operation. In addition, necessary safety equipment must be on board and may include sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses.

e. Dumpster/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.

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. Emergency equipment information is in Attachment F.

g. Security--The operation of each outside light, gate, and lock must be checked each operating day. In addition, the fence must be inspected for deterioration on a weekly basis.

C.2 SUBPART CC COMPLIANCE

Safety-Kleen has developed a Subpart CC Compliance Plan, which details procedures to achieve compliance with Subpart CC requirements. The plan includes provisions for an annual visual tank inspection of the waste solvent storage tank (to the extent possible) and vent system, as well as container inspections upon arrival at the facility and proper container management. A copy of the Subpart CC Compliance Plan is included in Attachment C-2.

C.3 SUBPART BB COMPLIANCE

Safety-Kleen complies with Subpart BB requirements by inspecting the process piping and equipment. Each valve, joint, flange, pressure relief device, pump, etc. is marked with a unique number. A map showing this equipment within the facility is maintained as a part of the inspection forms. Each valve, joint, flange, pressure relief device, pump, etc. is inspected to insure the equipment is not leaking and is functioning properly. Open-ended pipes are capped when not in use. An equipment inventory for inspections (Attachment C-3) is used to document compliance with Subpart BB inspections, and as required by 40 CFR 270.25.

ATTACHMENT C-1

EXAMPLE INSPECTION FORMS

ATTACHMENT C-2

SAFETY-KLEEN SUBPART CC COMPLIANCE PLAN

SUBPART CC COMPLIANCE PLAN

Safety-Kleen Systems, Inc.
2720 Girard NE
Albuquerque, New Mexico 87107
NMD000804294

The Safety-Kleen Albuquerque, New Mexico facility shall control air pollutant emissions from waste management units at this facility pursuant to the requirements of RCRA Subpart CC, through implementation of this compliance plan.

The following plan describes this facility's waste determination procedures, tank and container design/management practices, organic emission controls, inspection and monitoring, and recordkeeping and reporting, pursuant to requirements/standards promulgated under RCRA Subpart CC.

Waste Determination Procedures

For purposes of waste determination, this facility utilizes knowledge developed in the Waste Characteristics portion of the Operation Plan/Permit. For those hazardous waste which are managed on a transfer basis, and which are not described in the Operation Plan/Permit, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all wastes managed in tanks or containers at this facility may display an average volatile organic concentration of greater than 500 ppmw at the point of waste origination. In the same manner, these same wastes have been determined to have greater than 10% organic content by weight. Therefore, all hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

Point of Waste Origination

The point of waste origination for all wastes generated offsite and transported to the site in closed containers, which are subsequently managed in tanks or containers at this facility, is effectively the site boundary at the entrance gate.

For those hazardous wastes generated onsite, the point of waste origination is the point of waste generation, as previously defined in RCRA.

Tanks

Tanks which manage organic wastes at this facility are described in detail in the Operation Plan/Permit. Certain features of these units, as they relate to the Subpart CC standards, are described below.

Waste mineral spirits USTs and ASTs are fixed roof, non-pressurized, quiescent tanks. All waste tanks at the facility are Level 1 tanks under Subpart CC. The tank design capacity is less than 20,000 gallons, and the waste in these tanks exhibits a vapor pressure of less than 76.6

kPa (11.1 psi). The actual vapor pressure of the waste managed in tanks is 0.2 psia. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 265.1084(c)(4). Documentation for the basis of this determination is found in the Waste Characteristics portion of the Operation Plan/Permit.

These tanks are designed so that all cover openings can be closed with no visible gaps, holes, cracks, or other open spaces into the interior of the tank. The cover and all cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position at all times except when waste is being added to or removed from the tank, or when necessary sampling or repair/maintenance is performed on the tanks.

These tanks are vented to the atmosphere through a safety device (conservation vent) which has been designed to operate with no detectable organic emissions when the device is in the closed position. In addition, these tanks are designed with a long-bolted manway pressure relief device, which remains in the closed position when not in use to relieve pressure.

The drum washing units at this facility are fixed roof, Level 1 tanks. These tanks are kept closed except when adding or removing wastes, sampling, or performing routine maintenance that requires the lid to be open.]

Containers

Containers which manage organic wastes at this facility are described in detail in the Operation Plan/Permit. Certain features of these units, as they relate to the Subpart CC regulations, are described below.

Containers managing hazardous wastes at this facility generally fall into three categories. (1) Those hazardous waste containers that are less than 26 gallons in capacity are wholly exempt from consideration under Subpart CC. S-K manages wastes with vapor pressures greater than 0.3 kPa at 20 ° C (e.g. lacquer thinner) in containers less than 26 gallons. In addition, containers of wastes that are transferred through the facility are still "in the course of transportation," and therefore are exempt from Subpart CC. (2) Containers with capacities between 26 and 122 gallons are all Level 1 containers, and generally meet the Level 1 standards as covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container. In addition, all Safety-Kleen containers used to manage waste meet applicable U.S. DOT regulations on packaging hazardous materials for transportation. S-K does not typically manage wastes with vapor pressures greater than 0.3 kPa at 20 ° C in containers with capacities between 26 and 122 gallons. Non-typical wastes that may be received in containers between 26 and 122 gallons and have vapor pressures that are greater than 0.3 kPa at 20 ° C, are managed "in the course of transportation" and are exempt from Subpart CC, as described in 1) above. (3) Containers with capacities greater than 122 gallons that manage hazardous wastes at this facility are not in light material service (i.e. containers greater than 122 gallons are not used to manage wastes with vapor pressures greater than 0.3 kPa at 20 ° C). Containers greater than 122 gallons are however, Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container. In addition, all Safety-Kleen containers used to manage wastes comply with applicable U.S. DOT regulations on packaging hazardous materials for transportation.

Inspection and Monitoring

Hazardous wastes accepted from off-site generators are already containerized when the facility accepts the waste. Such containers are visually inspected either at the time they are unloaded for storage or staged for transfer at the facility, or during the daily facility inspection. The inspection occurs within 24 hours of the waste's arrival at the facility. This written plan and schedule to perform the inspections is incorporated in the facility inspection plan by this reference.

No defects were noted on the used solvent underground storage tank, which could result in air pollutant emissions. Visual tanks inspections shall be conducted on an annual basis.

Recordkeeping

Documentation of tank and tank cover design: See Operation Plan/Permit.

Documentation of waste determination: See Waste Characteristics portion of Operation Plan/Permit.

Records of all visual inspection: See daily facility inspection records, and enclosed record of initial tank inspection.

Listing of all tanks, by unique identifying number, which are difficult or unsafe to inspect: See enclosed.

Results of the determination of the maximum vapor pressure of waste in tanks and record of the tank dimensions and design capacity: See Operation Plan/Permit.

Safety-Kleen Solvents
Vapor Pressure Summary
(Isoteniscope Method)

Product Name	Product Number	68^0 F (20^0 C)				100^0 F (38^0 C)			
		mm-Hg	psia	K Pa	Atm	mm-Hg	psia	K Pa	atm
S-K 105 [1]	6614 (CA) 6617 (Non-CA)	2	0.039	0.267	.003	6	0.116	0.800	0.008
S-K 140 [1]	6616	<1	<0.019	<0.133	<0.001	1.5	0.029	0.200	0.002
S-K 150 [1] (Premium)	6605	.6	0.012	0.080	0.001	1.7	0.033	0.227	0.002
Immersion Cleaner [2]	699	<0.41	<0.0079	<0.055	_	_	_	_	_
Actrel PC-95 [3]	6608	.02	0.0004	0.003	0.001	_	_	_	_
Heavy Duty Lacquer Thinner [4]	6782	75-94.7	1.45-1.83	10-12.6	0.10-0.134	_	_	_	_
Low V.P. Lacquer Thinner [4]	6664	24-35	0.46-0.68	3.20-4.67	0.03-0.05	_	_	_	_

1 These materials are the products are used in a manner that generates spent parts washer solvent.
2 This material is the product used in a manner that generates spent immersion cleaner.
3 This is a material that distributed for a short time to be used for parts washing. This product has been discontinued
4 These materials are the products are used in a manner that generates lacquer thinner waste.

(ammended April 23, 2003)

ATTACHMENT C-3

EQUIPMENT INVENTORY FOR INSPECTIONS

ATTACHMENT D

PERSONNEL TRAINING

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 the job assignment. This section 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 40 CFR 264.16. The regional environmental professional directly assists with the training of new Branch Managers. The 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

Environmental compliance and training of facility employees is the responsibility of the Branch Manager. The Safety-Kleen corporate office provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for facility personnel that is in accordance with 40 CFR 264.16(a)(2). In accordance with 40 CFR 264.16(d)(1), job descriptions for branch personnel are in Appendix D-2. A list of employees, their job titles and job functions will be maintained at the facility.

D.2.1 Branch Manager

The Branch Manager (which may include the resource recovery manager, branch sales manager, branch automotive manager, etc. or designate) is ultimately responsible for the operations at the service center. The sales representatives, secretary and Material Handler report to the 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 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 waste 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.

D.2.2 Corporate Compliance Department

Safety-Kleen's Corporate Compliance Department has personnel on staff who provide guidance to divisional and regional personnel for training, permitting, and other compliance issues for service centers in a given geographic area of the country.

D.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training is accomplished using classroom, videotape, and on-the-job methods. This training is sufficient to allow the Branch Manager to in turn train his facility employees. The regional/corporate offices prepare a training program for employees, and documents that the program has been executed.

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. Safety-Kleen ensures that the Branch Manager has received adequate training in order to train branch personnel. An example training outline is provided in Attachment D-2, and demonstrates that facility personnel are trained in hazardous waste management procedures.

D.3.1 Training of new Branch Managers

New managers are trained for several weeks before they begin their new positions. This training includes onsite, on the job, and offsite classroom training. 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.

The training culminates with additional training at his/her new facility, under the direction of an environmental professional. This training may include a review of the facility permit, Part A and Part B permit application including the Waste Analysis Plan, Inspection Plan Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. Additional time is used reviewing past environmental compliance at the 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 Branch Manager and is done within six months of starting. It includes the items listed in the Example Training Plan Outline (Attachment D-1), and may include emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues.

D.3.3 Training of Sales Managers

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 Branch Manager in attaining sales goals in a specific line of business which Safety-Kleen offers. Though most training for this position is within the area of sales, the Sales Manager also receives the training in the Example Training Outline in Attachment D-1. A Sales Manager may also be trained as the designate for performing facility inspection. A review of the Contingency Plan with the Branch Manager (or designate) is required. A job description for this position can be found in Attachment D-2.

D.3.4 Training of New Sales Representatives

New sales representatives are trained onsite where 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 may be in the form of videotape presentations and a review of the Contingency Plan. The Contingency Plan must be reviewed with the Branch Manager (or designate) before the sales representative formally begins their new position and annually thereafter. All items listed in the Example Training Plan Outline (Attachment D-1) 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/She may be a designate for the facility inspection and must be trained by the Branch Manager (or designate) as such. Within two weeks, the Branch Manager (or designate) must review the Contingency Plan with the Material Handler, and within six months the Material Handler must review the items listed in the Example Training Plan Outline (Attachment D-1).

D.3.6 Annual Training

On an annual basis, employees are trained using a program prepared and updated annually by the Safety-Kleen regional and/or corporate compliance offices and health and safety department. The annual training includes updates on environmental regulations, an in-depth review of the Contingency Plan and a review of RCRA inspection criteria.

Service center employees must annually review the items listed in the Example Training Plan Outline. This review may be in the form of slide/tape, videotapes and/or classroom presentation, and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental regulations are issued by the regional/corporate offices and must be read and discussed by branch personnel.

D.4 TRAINING RECORDS

Employees may complete a written examination at the conclusion of a training program. The employee training is documented and the records are maintained onsite. Employees may not work in unsupervised positions until the contingency plan has been reviewed and they understand emergency response procedures.

ATTACHMENT D-2

EXAMPLE EMPLOYEE JOB DESCRIPTIONS

ATTACHMENT D-1

EXAMPLE TRAINING PLAN OUTLINE

ATTACHMENT E

FACILITY DESIGN, 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 warehouses and the Flammable Storage Building.

d. Remote controls for all tank operations are inside the warehouse.

e. There is outdoor lighting on all sensoring devices and automatically comes on at low light hours of the day.

INSPECTION PROCEDURES: See Attachment C for 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 supplied by the City of Albuquerque.

PREPAREDNESS AND PREVENTION PLAN

E.1 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.1.1 Tank Storage

The 12,000 gallon underground storage tank is 8' in diameter and 32.5' long. It is constructed of ¼" thick carbon steel and is double-walled with a leak detection system installed in the interstitial space. 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. The tank 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 each operating day.

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 and the pump automatically shuts off. The pump on the tanker truck can be turned off immediately if the alarm sounds when filling the product solvent tank. 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 is included in Attachment E-2. A description of the high level alarm system, leak detection system, and installation documentation is provided in the report.

The return and fill station is a concrete block structure with a metal roof and the secondary containment is monolithically poured concrete. Elevated grating is situated above the containment area, which allows workers to easily remove or return containers to the route trucks, and transfer used solvents to the waste storage tank via the drum washer units. The two dumpster/drum washers are tight-piped to the tank, piping is below ground and the joints are welded to minimize the potential for leaks.

E.1.2 Drum Storage

The slab, curbing and collection trenches for the drum storage areas in the warehouses and flammable storage building are made of steel-reinforced concrete and the concrete has been poured so that no cracks or gaps exist between them. A concrete curb, approximately

four inches high and six inches wide, 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 floor and curbing is coated with a material so as to be impermeable to contain leaks and spills. The materials placed in the drum storage areas are compatible with the containers in which they are stored. Run-on to the container storage areas is prevented by roofs, walls, and elevation above grade. The only case where storm water could enter CSAs is if doors were left open and wind were to drive some amount of storm water into the facility. It is anticipated that only a de minimus amount of water could enter the facility in this manner.

The immersion cleaner, dry cleaning wastes, aqueous solvent, and paint wastes are stored in containers meeting DOT specifications. Immersion cleaner and dry cleaner waste are never opened at the branch facility except for annual re-characterization sampling. The drums are 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 H-3 Flammable Storage Building wall construction is of concrete masonry. Secondary containment is provided by a coated, reinforced concrete floor that slopes toward a blind sump and collection trenches. It is painted with 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 during non-operating hours.

E.2 WASTE MANAGEMENT PRACTICES

The Albuquerque service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The underground storage tanks, drum storage areas and return and fill station all have secondary containment and the service center has the equipment necessary for employees to safely manage wastes onsite.

Used solvent from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. Used material in containers meeting DOT specifications is poured into the dumpsters in the return and fill station and the material in the dumpster is pumped into the used solvent storage tank. The return and fill station has secondary containment in the form of a 20.0' x 14.8' (1,548 gallons) concrete slab with curbing and a sump. The total volume of waste and product will not exceed 10 times the secondary containment volume.

The sediment which accumulates in the bottom of the dumpster/drum washer is removed manually (as necessary), drummed and temporarily stored in the return and fill station according to the satellite accumulation requirements of 40 CFR 262.34(b). Sediment is placed in the drum to no more than 2 inches from the top of the drum.

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 used solvent. Each tank is equipped with an audible and visual high level alarm.

The drum storage areas in the warehouse are used to store containers of waste, which may include (1) used immersion cleaner, (2) dry cleaning wastes, and (3) used aqueous solvent and (4) used photochemical wastes. Additional materials, such as non-hazardous wastes, transfer wastes, or product may be stored as needed. 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' (431 gallons) in the West warehouse and two collection trenches with approximately 2' x 3' x 3' (132 gallons) and 2' x1.5' x 6' (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 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, 3) used solvent; and (4) other flammable wastes or products, as necessary.

All containers used for storage of hazardous waste will meet DOT specifications. Example specifications for containers is included in Attachment E-3.

Adequate aisle spacing will be maintained in the warehouse container storage areas and Flammable Storage Building. Drums in the storage areas will be placed on pallets and moved with a forklift or pallet jack. Drums will be stored no more than two high on a pallet and no more than two pallets high.

E.3 RECORDKEEPING REQUIREMENTS

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.3.1 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 Branch Manager or 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 generally the TSDF as well as the transporter, so only one copy is kept on file).

The requirements described above do not apply to hazardous waste produced by generators of more than100 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 form this facility, the Branch Manager or his designate must:

a. Prepare a manifest before transporting the waste offsite.

b. Designate on the manifest one facility which is licensed to handle the waste described on the manifest. The Branch Manager may also designate on the manifest one alternate facility which is licensed to handle the 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 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 DOT regulations in 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 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 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 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. Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the Branch Manager or designate must review the manifest and check the information on the manifest for correctness. It should be noted that the 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. The generator, transporter(s) and TSDF 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 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 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 wastes 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.3.2 Operating Record

The operating record is maintained at the facility, and includes:

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.3.3 Biennial Report

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 offsite facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year, and for imported shipment, 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 offsite 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.4 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. Palletized wastes will be moved using a forklift or pallet jack. Upon arrival at the service center, containers of used 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.4.1 Potential Minor Spill Sources

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

a. Pouring of drummed solvent into the dumpster--Employee training emphasizes the importance of taking care in emptying the drums. However, as the contents of the drums are poured into the dumpster, solvent can splash out. The return and fill station is underlain by concrete containment with a sump. 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. The drum storage areas are designed so that if the contents of a container are spilled, the spilled material will be contained within the concrete trenches. If material is spilled, other containers are situated on pallets, therefore will not be in contact with the spilled material.

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 normally a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results from a spill will be removed manually, drummed, and shipped to a Safety-Kleen recycle center for proper disposal.

E.4.2 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 used 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 to the storage tanks present a potential for leaks. Regular inspection of this equipment and the solvent inventory will detect any leaks.

E.4.3 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-- Smoking is only permitted in designated areas, which are separate from any waste management areas. The solvent handling areas and the underground 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 in containers are stored in the Flammable Materials Building, which is constructed with special explosion-proof wiring and is equipped with a fire suppression system.

c. 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 stored at this facility and the solvent vaporization will be minimal under normal working conditions.

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See 'a' above and 'c' below.

4. Damage the structural integrity of the Safety-Kleen facility--The solvents will not cause deterioration of the tank, drums or other structural components of the facility.

d. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

e. "No Smoking" signs are posted in areas where solvents are handled or stored.

f. Fire extinguishers must be checked once per week and tested by the fire extinguisher company once per year. Fire extinguishers are placed at several locations throughout the facility.

E.5 TANK EVALUATION AND REPAIR PLAN

The product and waste solvent stored in the tanks at this facility are compatible with the carbon steel structure. If, during the inspections, corrosion is noted, or the leak detection system indicates a leak, the tank will be immediately taken out of service and repaired and/or replaced. In the case of a tank which leaks outside of the secondary containment, the facility's contingency plan will be initiated to insure the removal of any contaminated soil. Any extensive repairs to or replacement of the tank system will be assessed and certified by an independent engineer before the system is returned to use.

E.6 EXTERNAL FACTORS

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are accessible only to Safety-Kleen personnel and the main power switches are located inside. Also, the drum storage areas are in buildings which are accessible only to authorized personnel.

a. Vandalism – only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.

b. Strikes – A strike would not result in a solvent spill or fire.

c. Power Failure – A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease (i.e., pumps will shut off).

d. Flooding – The site elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility. A flood plain map is shown in Section 1.0.

e. Storms or Cold Weather - The solvent return and fill station and drum storage areas are roofed to eliminate the possibility of rain or snow entering the dumpsters. No precipitation event is anticipated that will affect the facility.

E.7 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS

Because the facility is small, internal communication within the building and the solvent return/fill area is accomplished by voice. An alarm is located at the return and fill station which alerts another employee in the warehouse that there may be a problem. Telephones will be used to report a spill or fire and to summon assistance from local and state emergency response agencies (if necessary). Emergency phone numbers of local and state emergency response teams are posted by each phone located in the sales office. Included in these phone numbers is the 24-hour telephone number which can be used to contact Safety-Kleen's environmental response coordinators. Releases to the environment will be reported within 24 hours, as required by permit condition Module I, Section E.13 and permit Attachment F, The Contingency Plan.

ATTACHMENT E-1

FACILITY DRAWINGS

ATTACHMENT E-2

UNDERGROUND TANK INSTALLATION ASSESSMENT REPORT

ATTACHMENT E-3

EXAMPLE CONTAINER SPECIFICATIONS

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 Branch Manager is the emergency coordinator. The alternate emergency coordinator is a trained employee designated to this position by the emergency coordinator.

EMERGENCY NOTIFICATIONS:

Albuquerque Police Department	911 or (505) 242-2677
Albuquerque Fire Department	911 or (505) 243-6601
Presbyterian Hospital	911 or (505) 841-1111 or (505) 345-3655 (non-emergencies)
Safety-Kleen 24-Hour Emergency Response	(800) 468-1760
Rinchem (Emergency Response Contractor)	(505) 883-4242
New Mexico Environment Department	(505) 827-9329
National Response Center	(800) 424-8802

CONTINGENCY PLAN

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

F.1 PURPOSE

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

The contingency plan is to be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment. The contingency plan is kept at the facility. The Branch Manager ensures that the contingency plan is updated as necessary.

F.2 EMERGENCY COORDINATOR RESPONSIBILITIES

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

The emergency coordinator and alternate must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Attachment F-1. Also listed in Attachment F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation. In addition, facility personnel should be aware of the location of emergency equipment. An emergency equipment location plan is included in Attachment F-2, Figure F-1.

F.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation that requires implementation of the contingency plan, the emergency coordinator (or alternate when the emergency coordinator is not available) must immediately:

a. activate the internal facility communication system to notify all facility personnel;

b. notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number - 800/468-1760; and

c. notify appropriate state or local agencies with designated response roles, as 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 of 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 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 impacted or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact Safety-Kleen's Emergency Response Coordinator to report the incident. Fires, and explosions generally 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 should also 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), Safety-Kleen's regional and/or corporate offices should be consulted for guidance.

The emergency coordinator must ensure that, in the potentially 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.

F.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

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

b. The coordinator must immediately notify the Safety-Kleen Emergency Response Coordinator, and the New Mexico Environment Department (NMED) of any spill or release of hazardous waste in excess of the reportable quantity within 24 hours. The department will report to NMED the following:

   1) name and telephone number of notifier;

   2) name and address of facility;

   3) time and type of incident (e.g., release, fire);

   4) name and quantity of material(s) involved, to the extent known;

   5) the extent of injuries, if any; and

   6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with Section F.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 30 days of the incident, Safety-Kleen will submit a written report on the incident to the New Mexico Environment Department. The report will contain the information set out in 40 CFR, 264.196(d)(3) and must include:

a. name, address, and telephone number of the owner or operator;

b. name, address, and telephone number of the facility;

c. date, time, and type of incident (e.g., fire, explosion);

d. name and quantity of material(s) involved;

e. the extent of injuries, if any;

f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and

g. estimated quantity and disposition of recovered material that results from the incident.

F.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

a. The person who discovers/causes the spill reports to the emergency coordinator.

b. The emergency coordinator contacts the Safety-Kleen Emergency Response Coordinator and NMED.

F.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
NMED	Report releases, fires, and explosions.
Rinchem	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

F.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections which to follow.

F.3.1 Minor Spills

If a spill should occur while pouring used solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill

occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center or other permitted facility for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. The worker will enter the area wearing appropriate personal protective equipment (PPE). The Material Safety Data Sheets (MSDSs) will be consulted to ensure appropriate PPE and spill procedures are utilized. Example MSDSs for typical S-K products are presented in Attachment F-3. Generally, spilled liquids are collected, placed in a container, and returned to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department (if the spill is of a reportable quantity).

In the event a container is leaking, the contents will be transferred to a new container with a portable pump. A wet/dry vacuum is present at the site and may also be used in the event of a minor spill.

F.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of Section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material which escapes collection can contaminate soil, surface water, groundwater, and/or sanitary sewer systems. Emergency response protocol for this type of spill should be as follows:

a. Assist any injured people, and call for medical assistance as necessary.

b. Stop the flow of material, if possible.

c. Retain, contain or slow the flow of the material if it can not be stopped.

d. If solvent escapes containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Safety-Kleen Emergency Response Coordinator.

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 Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number: 800/468-1760. 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 NMED (telephone: 505/827-9329 24-hour number).

The person reporting a spill should be prepared to give their 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, the containment status and specify any equipment needed. Contaminated material resulting from remedial actions for major spills, will be disposed of at a properly permitted treatment or disposal facility.

Equipment used to respond to spills must be cleaned and decontaminated with a detergent/water 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, waste residues, and decontamination fluids from the cleanup of spills or releases (whether major or minor), will be containerized and managed as hazardous waste unless analytical results verify the wastes are not hazardous. Wastes resulting from spill cleanups will be disposed in accordance with applicable regulations (i.e., HWMR-5, Part VIII).

F.3.3 Fire Control Procedures

If a small fire occurs, personnel must act quickly with an appropriately rated fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately the facility will be excavated and the fire and police departments will be contacted.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those which can immediately be extinguished using a fire extinguisher. Any fire which cannot be brought under control immediately or which has the potential to become uncontrollable, warrants implementation of the evacuation plan. Ignitable waste at the Albuquerque facility is stored in specially designed tanks, or in containers and placed in the Flammable Storage Building.

Safety-Kleen personnel and local authorities must be aware of appropriate response procedures, should a fire occur at the facility. This may include isolating the hazardous area and donning an appropriate positive pressure breathing apparatus.

F.4 EVACUATION PLAN

Exits are clearly marked in the warehouses and office areas. Employees are trained to be aware of all potential escape routes. The facility evacuation plan is included in Attachment F-2 (Figure F-2).

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Girard Boulevard 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, from a neighboring facility or using a cellular phone.

F.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

An emergency response contractor is identified in the Contingency Plan Abstract (Page F-1) and on the Emergency Information Sheet (Attachment F-1). 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

Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The branch manager has the overall responsibility for remediating any discrepancies found during a routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule.

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 (Attachment F-1) 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 F-1

EMERGENCY CONTACT INFORMATION

ATTACHMENT F-2

EMERGENCY EQUIPMENT LIST, LOCATION PLAN AND EVACUATION PLAN

EMERGENCY EQUIPMENT LIST

The following equipment shall be located in designated areas of the facility and the supply checked monthly:

Gloves - Gloves which are compatible with parts washer solvents are to be used when handling the solvents.

Safety Glasses or Face Mask - Whichever the worker prefers, is to be worn when loading or unloading the solvent.

Plastic Aprons - Are available for the situations where a solvent may get on the worker's clothing.

Shovels - In the event of a spill, shovels will be used to pick-up contaminated sorbent material.

Decontamination of all equipment is accomplished by washing with soap and water.

Eye Wash Stand--The eye wash stations are at several locations located at the Service Center, as shown on Figure F-1. The workers should try the stand and be familiar with its operation. The eye wash stand should be checked once a week for operation.

Showers--Should be checked periodically to ascertain that they are operational. Located in locker room area. Eye wash stands are equipped with a hand-held spray nozzle, which may also be used as a shower.

Ventilation--Any area that is closed and collects vapors should be avoided or equipped with proper fans to ensure adequate ventilation.

Fire Extinguisher--Each center should have a minimum of two 10-pound ABC extinguishers, located at the points where solvents are transferred. An ABC extinguisher is a universal system used on paper, wood and electrical, as well as solvent fires. The extinguishers must be full and carry an inspection tag.

Absorbent Material--An adequate supply (200 sheets, 2 bales and/or vermiculate) should be on hand to handle small spills. In the event of a spill, absorbents will be used to clean up spilled materials. Contaminated absorbent material will be placed in drums and managed as hazardous waste.

ATTACHMENT F-3

EXAMPLE MATERIAL SAFETY DATA SHEETS FOR TYPICAL SAFETY-KLEEN PRODUCTS

ATTACHMENT G

CLOSURE PLAN

CLOSURE PLAN

ABSTRACT

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

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

WASTE UNITS TO UNDERGO CLOSURE:

a. Tank Storage - one 12, 000 gallon underground 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 - This waste management unit is used to transfer wastes to the used solvent storage tank. It has a containment capacity of approximately 350 gallons 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 that may be stored at this facility at any time.

CLOSURE PLAN

G.1 PURPOSE

The Albuquerque service center operates as a storage facility for hazardous wastes. The hazardous waste management units (HWMUs) must be closed in accordance with the closure requirements of 40 CFR 264.110 through 40 CFR 264.115. Closure of the facility HWMUs will be carried out in accordance with this plan. An itemized schedule and closure cost estimate are in Attachment G.1. The closure plan, as part of the permit, will be kept on site.

The Safety-Kleen corporate environmental department is responsible for revising, updating and distributing copies of the Closure Plan. Safety-Kleen will remove all hazardous wastes and residuals from the facility to a level that is protective of human health and the environment will therefore eliminate the need for further maintenance and care. The facility is expected to close in the year 2032.

The HWMUs, which are subject to closure, are described in the Closure Plan Abstract. The units include one aboveground storage tank system, a return and fill station with a drum washer (ancillary equipment) and a container storage area. This closure plan identifies steps necessary to conduct facility closure, or partial facility closure (closure of a unit).

G.1.1 Notification of Closure and Partial Closure

Safety-Kleen will notify the Department in writing of any intent to close or partially close the facility. The Department will receive notification 45 days before Safety-Kleen begins full facility closure.

Partial closure of units will be performed using the procedures described for full closure. In accordance with 40 CFR, Safety-Kleen may close permitted units, but delay certification of partial closures until final facility closure is completed.

Safety-Kleen will submit the names of the contractor(s) who will clean and decommission the permitted units prior to commencing closure activities.

G.2 DECONTAMINATION OF SECONDARY CONTAINMENT

G.2.1 Secondary Containment

The secondary containment area may be left in place after decontamination or removed. The following procedures will be used to decontaminate the containment area if it is to be left in place or removed.

An independent Professional Engineer will inspect the containment area dike and slab for the presence of cracks, fissures, missing seals, etc. If lapses of integrity are noted by the Engineer and determined to have the potential for wastes to migrate to underlying soils, soil samples will be collected in accordance with the procedures discussed in Section G.5 after decontamination is completed.

Visible cracks or gaps in the containment (if present) shall be sealed prior to commencement of cleaning to prevent migration of rinse water outside of the containment area. The containment area will be washed using a non-phosphate detergent/water solution and high-pressure spray. Prior to pressure washing, the containment area surfaces will be sprayed with a non-phosphate detergent/water solution and scrubbed with a stiff-bristle broom. Areas with staining or scale will be scrubbed and/or scraped to remove residue to the extent practicable.

A high-temperature pressure washer unit will be used to perform the final decontamination activities. Following the final wash, the area will be triple rinsed with tap water. A sample of the tap water and a sample of the final rinse will be collected and analyzed for constituents representative of waste codes permitted for specific unit. Both the tap water and the rinse sample will be analyzed for volatile organic compounds (VOCs). The VOC concentration of the final rinse and the tap water sample will be compared to ensure that the concentrations of any VOCs detected in the rinse sample actually result from the area cleaned.

If the VOCs concentration in the rinse sample is less than 1 mg/L, the containment area will be considered decontaminated. Decontamination of the concrete will be repeated as necessary, until the 1-mg/L level has been met. The residual waste materials and rinse, including precipitation that runs-on inside the containment area, will be collected within appropriate storage devices and managed as a hazardous waste in accordance with applicable regulations.

The wash/rinse water will be collected and shipped to a recycle center, reclaimer or other permitted treatment/disposal facility. The quantity of wash/rinse water will be kept to a minimum to limit the amount of waste material.

If the containment area is removed, the concrete slab and dike walls will be broken into manageable sized pieces and transported to a concrete recycle or disposal facility. The area may be backfilled with clean fill materials and graded as necessary to match surrounding elevation.

G.2 REMOVAL OF WASTE MATERIAL AND OPENING OF THE TANK

The contents of the tank will be removed using a pump, vacuum or similar equipment and then shipped to a recycle center, reclaimer or other permitted treatment/disposal facility. To gain access, the man way at the bottom of the tank will be used. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the man way. Care will be exercised to minimize spark generation when working on the tank.

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. Confined space entry will be conducted in accordance with 29 CFR 1910.146. Tank entry procedures will be specified in the site health and safety plan prepared for use during closure activities. In all cases, personnel performing closure activities will have completed 40-hour OSHA hazardous waste training requirements (29 CFR 1910.120).

Prior to entering the tank, personnel will have appropriate protective respiratory equipment and clothing. Once the tank has been opened, it must be provided with positive ventilation. The tank will then be inspected to determine the approximate quantity and physical conditions of any residual waste material, as well as the integrity of the tank system.

Procedures for purging or venting tanks are described in API, RP1604 "Removal and Disposal of Used Petroleum Storage Tanks" and OSHA "Permit Required Confined Spaces" (29 CFR 1910.146). The contractor will monitor vapors to ensure the tank atmosphere has combustible gas concentrations of less than 10% of the lower explosive limit (LEL).

G.2.1 Cleaning and Decommissioning of the Tank, Piping and Ancillary Equipment

The following activities will be performed during partial or final closure (as appropriate) after inspection and sealing (as needed) of the secondary containment:

a. After the contents of the tank have been removed, remove any remaining residual waste material from the tanks. The method used to remove the residual material will depend on the characteristics of the material.
b. Visually inspect the tank after the waste material has been removed from the tank and document the results of the inspection.
c. Pressure wash with detergent solution, scrape, squeegee (if necessary) and triple rinse the tank interior, removing all residual waste material and wash/rinse water. The wash/rinse water will be collected and shipped to a recycle center, reclaimer, or other permitted treatment/disposal facility. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.
d. Disconnect and decontaminate all appurtenant piping and pumping equipment.
e. Visually inspect appurtenant piping, equipment or underlying surfaces for evidence of leakage (i.e. staining and residue) and document the results of the inspection. The piping will be decontaminated with a detergent-water solution, rinsed with tap water, and either reused or removed and cut into manageable sized pieces for disposal as scrap.
f. Transport and dispose of all waste material generated during the project.

During closure of the tank system, Safety-Kleen will remove or decontaminate waste residues including contaminated system components, structures, and equipment contaminated with waste. These materials will be managed as hazardous waste, until determined to be non- hazardous based on laboratory analysis.

G.2.2 Removal of the Tank

Following removal of wastes and decontamination activities, the tank may be reused onsite (partial closure) or at an offsite location, or scrapped. If the tank is to be transported offsite or scrapped, the following procedures will be observed to safely remove the tank:

a. Disconnect all appurtenant piping.
b. Disconnect all appurtenant pumping equipment.
c. If the tank is to be scrapped, the tanks and equipment will be removed and recycled in accordance with 40 CFR 261.1(c)(6) and (7). The contractor or scrap metal facility will provide verification of destruction.
d. If the tank is to be reused following decontamination, the final rinse will be sampled. The rinse sample will be analyzed for volatile organic compounds. If the total volatile organic compound concentration is less than 1 mg/L, the tank will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed.
e. The dirt under the tank will be tested for contamination and any contaminated dirt removed

G.3 CONTAINER STORAGE AREA AND FLAMMABLE STORAGE AREA

The container storage area is used for the storage of containers of used immersion cleaner, dry cleaning waste, aqueous cleaning solvents, dumpster sediment and other non-regulated wastes or products. The flammable storage area is used for storage of paints and other flammable waste. At closure, all the contents of the containers will be removed and transported to an appropriate permitted hazardous waste management facility after proper packaging, labeling, and manifesting.

The concrete floor and containment trenches of the container storage area will be high-pressure cleaned with a detergent-water solution and triple rinsed with tap water. The final rinse will be sampled and analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If the total volatile organic compound level is less than 1 mg/L, the container storage area will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed. All rinse wastes from the container storage area closure process will be reclaimed or properly treated at a permitted facility.

The metal flammable storage area will be high-pressure cleaned with a detergent-water solution and triple rinsed with tap water. The final rinse will be sampled and analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If the total volatile organic compound level is less than 1 mg/L, the flammable storage area will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed. All rinse wastes from the container storage area closure process will be reclaimed or properly treated at a permitted facility.

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 and to dispense clean solvents into containers. At closure, the sediment in

the drum washer/dumpster will be removed, containerized, labeled, and manifested for proper treatment and/or disposal through a Safety-Kleen Recycling Center, reclaimer or other treatment/disposal facility.

The drum washer(s), containment area, the dock structure, and the metal secondary containment area will be washed with a detergent solution and rinsed. The rinse may either be discharged through the appurtenant piping system into the storage tank (prior to cleaning and removing the storage tank), or contained within separate containers, vacuum truck or other appropriate storage device. The piping and equipment decontamination activities may also be disconnected and individually cleaned within the return and fill station's metal secondary containment unit.

Following decontamination of the equipment, the metal containment area will be decontaminated. Wash and rinse water will be collected from the within the containment area and containerized. Wastes generated during closure of the return and fill structure will be transported to a permitted hazardous waste facility.

The clean dumpster/drum washers and dock structure will be staged for reuse or scrapped. If the return and fill dock structure or drum washers will be reused, a sample will be collected of the final rinse. If the return and fill station and/or components will be scrapped during closure, rinse samples will not be collected. If the total VOCs concentration is less than 1 mg/L, the components will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed.

G.5 SOIL SAMPLING

If the results of the inspections for the HWMUs indicate lapses of integrity exist in the secondary containment system(s) that may have allowed the potential for waste to migrate to underlying soils, soil samples will be collected.

If lapses of integrity are found that may have allowed wastes to migrate to underlying soils, soil samples will be collected every 5 feel along the length of an identified crack or gap or from immediately beneath the areas identified by the Registered Engineer. If the tank secondary containment is removed, soil samples will be collected from areas that exhibit waste-related staining if present.

If the inspection indicates no lapses of integrity, soil samples will collected as described below:

1. Tank Area: A minimum of two soil samples will be collected from beneath the tank farm concrete containment. One soil sample will be collected from the lowest point of the concrete containment (i.e., sump or trench). The second soil sample will be collected from beneath the concrete near the opposite corner or quadrant of the containment.
2. Return and Fill: A minimum of two soil samples will be collected from beneath the return/fill station containment area. One soil sample will be collected from the lowest point (sump) and one sample will be collected under the drum washer

unit. The New Mexico-registered Professional Engineer will select the actual sample locations.

3. Container/Drum Storage Area: A minimum of two soil samples will be collected from container storage area. A New Mexico-registered Professional Engineer will select the sample locations.
4. Flammable Storage Shed: One soil sample will be collected under the flammable storage area. A New Mexico-registered Professional Engineer will select sample locations.

A coring device or jackhammer will be used to remove concrete and expose underlying soil. Soil samples will be obtained with a hand auger or other appropriate sampler lined with stainless steel or brass sleeves. The soil samples will be retrieved from immediately below the bottom of the concrete to a depth of approximately six inches, using the procedures outlined in ASTM D 1452-80 "Standard Practice for Soil Investigation and Sampling by Auger Borings" or equivalent. Hand auger and equipment used for sample collection will be decontaminated prior to and between sampling events. The decontamination/rinse water will be collected, managed as a hazardous waste and transported off-site for disposal at a permitted waste management facility.

The soil samples will be labeled and placed on ice in a sample cooler. The samples will be submitted under chain-of-custody for analysis at a New Mexico-certified laboratory using EPA analytical protocol. The soil samples collected will be analyzed for constituents that are at a minimum, representative of the waste codes for which the units were permitted. The analysis will include volatile organic constituents using Solid Waste Method 8260, semi-volatile organics using SW846 Method 8270, and RCRA metals using SW 846 methods.

Analytical results from soil sampling will be forwarded to NMED. The analytical results from the soil samples will be compared to appropriate closure criteria and background date. Should the analytical results verify that no constituents were detected at levels above appropriate closure criteria, a Closure Certification Report will be submitted at the conclusion of the closure activities. If the analytical results of investigative samples exceed appropriate closure criteria, Safety-Kleen will prepare a remedial action plan/closure plan amendment to determine the extent of subsurface impacts. Subsequent remedial action plan/closure plan amendments will address a plan to remediate subsurface impacts to levels that are protective of human health and the environment, thereby achieving clean closure. A risk assessment may also be performed to further evaluate the analytical results and need for additional remediation to achieve clean or risk-based closure. If performed, the risk will be conducted according to EPA guidance. The risk assessment results will be used to develop alternate clean closure objectives with NMED.

In the event that contamination cannot be removed, or the clean up standards cannot be met, Safety-Kleen will submit an amendment to the closure plan to include a post-closure plan. The post-closure plan will be submitted within 90 days of the determination that contamination cannot be removed or clean up standards cannot be met.

G.6 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Mexico Environment Department (NMED) 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 likelihood that a person or entity 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 unless the closure period is extended by the NMED. When closure is completed, Safety-Kleen shall submit to NMED 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 and 40 CFR 264.115.

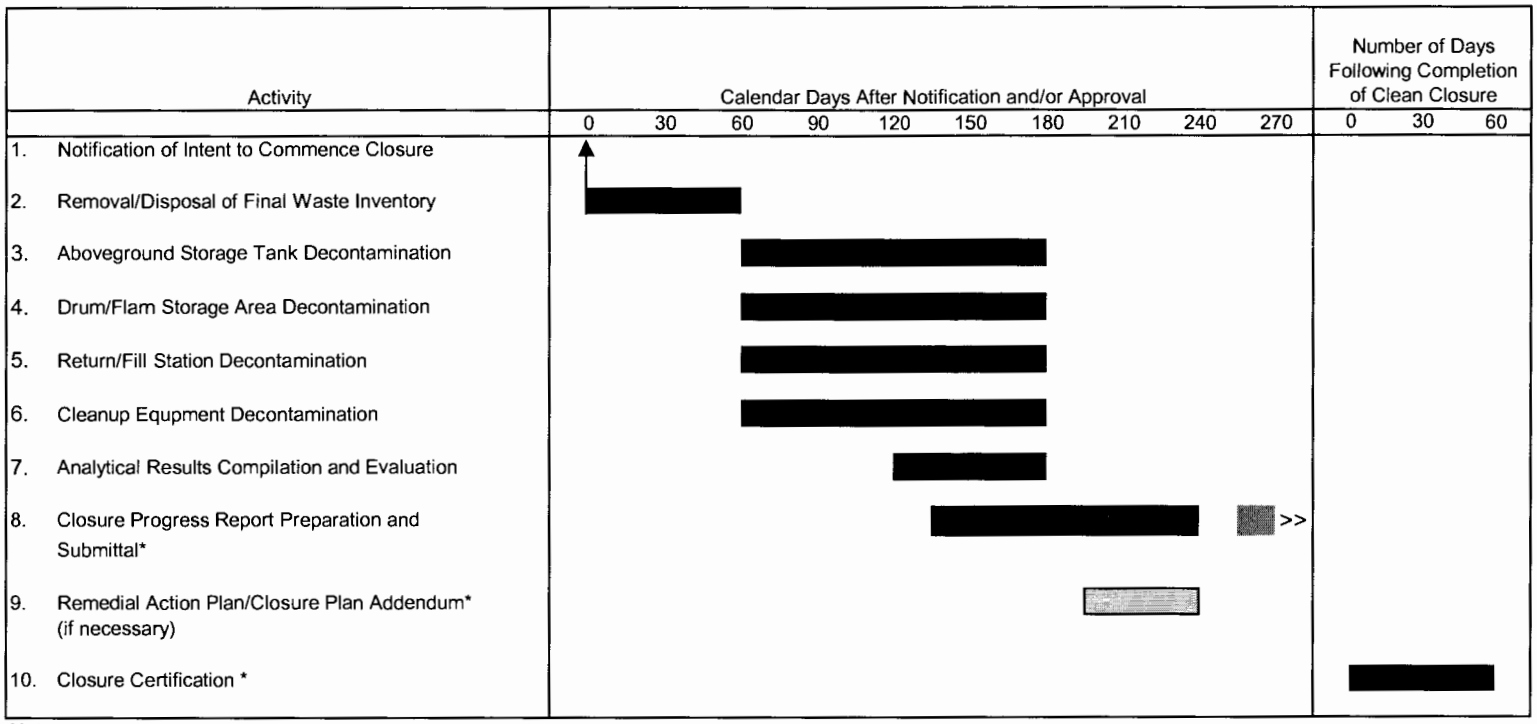
ATTACHMENT H

FINANCIAL LIABILITY DOCUMENTS

FINANCIAL ASSURANCE INFORMATION AND ESTIMATED CLOSURE COSTS

ATTACHMENT I

POLLUTION PREVENTION (WASTE MINIMIZATION) PLAN



Notes:

>>> Indicates that this activity continues until certification of "clean closure."

Indicates an optional activity based on the closure analytical results.

* If no impacts are detected during the decontamination activities, closure certification will be submitted within 60 days of the completion of closure activities.

Checklist of Required and Recommended Training

Employee Name: Branch:

Job Title: Job Start Date:

Lead Material Handler

Material Handler

Code	Description	Req'd	Delivered By	Where	When	Date Completed
HS 101; HS 101HTC*	24 Hour HAZWOPER	✓	HTC Trainer	Houston	Initial	
HS 107A	Controlled Substance Employee	✓	Training Handout	Houston	Initial	
HS 110*	Safe Procedures for Material Handling	✓	Qualified Trainer, H & S Mgr., or Regulatory Trainer	Branch or Houston	Initial	
HMTS**	Hazardous Materials Transportation Skills	✓	Certified Trainer	Houston	Initial	
ET 237	Drum Inspection and Closure	✓	Qualified Trainer	Houston	Initial	
HS 104	8 Hour HAZWOPER Refresher	✓	H & S Mgr., Regulatory Compliance Mgr., or SK Certified instructor	Branch	Annual	
HS 201	Forklift Operation	✓	Qualified Trainer or H & S Mgr.	Branch	Initial	
HS 203	Bloodborne Pathogens	One person per branch (see note 3)	Qualified Trainer	Branch	Annual (can be part of HAZWOPER refresher)	
HS 108a	Red Cross CPR		Red Cross Certified instructor	Branch	Annual	
HS 108b	Red Cross First Aid		Red Cross Certified instructor	Branch	Triennial	
ET 140	RCRA Update (permitted locations only)	✓	Qualified Trainer, Regulatory Compliance Mgr., or Environmental Mgr.	Branch	Annual	
ET 237	Drum Inspection and Closure	✓	Regulatory Compliance Mgr., Environmental Compliance Mgr., Transportation Compliance Mgr., or H & S Mgr.	Branch	Triennial	
HMTS_RE	Hazardous Materials Transportation Skills	✓	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Certified instructor	Branch	Triennial	

Notes: (3) At least one person per shift shall be trained in first aid and CPR. A first aid responder shall be available at all times.

*HS_101HTC includes HS_110 Safe Procedures for Material Handling
**HMTS at HTC includes ET_120 Load Securement

Checklist of Required and Recommended Training

Employee Name: Branch:

Job Title: Job Start Date:

Branch General Manager

Code	Description	Req'd	Delivered By	Where	When	Date Completed
HS 101; HS 101 HTC*	24 Hour HAZWOPER	✓	HTC Trainer	Houston	Initial	
HMTS**	Hazardous Materials Transportation Skills	✓	HTC Trainer	Houston	Initial	
ET 176	Driver Safety Training (including vehicle inspections and exempt log training)	✓	Qualified Trainer	Houston	Initial	
ET 237	Drum Inspection and Closure	✓	Qualified Trainer	Houston	Initial	
HS 104	8 Hour HAZWOPER Refresher	✓	H & S Mgr., Regulatory Compliance Mgr., or SK Certified instructor	Branch	Annual	
HS 107b	Controlled Substance Abuse Training for Supervisors	✓	H & S Mgr., or SK Certified Instructor	Branch	Initial	
HS 151	Accident Investigation	✓	H & S Mgr., or SK Certified instructor	Branch	Initial	
HS 203	Bloodborne Pathogens	One person per branch (see note 3)	Qualified Trainer	Branch	Annual (can be part of Hazwoper refresher)	
HS 108a	Red Cross CPR		Red Cross Certified instructor	Branch	Annual	
HS 108b	Red Cross First Aid		Red Cross Certified instructor	Branch	Triennial	
PT 300	Loss Control Management		H & S Manager	Branch	Initial	
HMTS _RE	Hazardous Materials Transportation Skills	✓	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Certified instructor	Branch	Triennial	
ET 140	RCRA Update (permitted locations only)	✓	Qualified Trainer or Environmental Compliance Mgr.	Branch	Annual	
ET 237	Drum Inspection and Closure	✓	Qualified Trainer, Regulatory Compliance Mgr., Environmental Compliance Mgr., Transportation Compliance Mgr., or H & S Mgr.	Branch	Triennial	
ET 330	Shipping Hazardous Material Samples	✓	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Qualified instructor	Branch	Initial, Triennial	

Notes: (3) At least one person per shift shall be trained in first aid and CPR. A first aid responder shall be available at all times.

Checklist of Required and Recommended Training

Oil & Vac Rep.

Employee Name: Branch:

Job Title: Job Start Date:

Code	Description	Req'd	Delivered By	Where	When	Date Complete
HS 101; HS 101 HTC*	24 Hour HAZWOPER	✓	HTC Trainer	Houston	Initial	
HS 107A	Controlled Substance Employee Driver Version	✓	Employee Handout	Houston	Initial	
HMTS**	Hazardous Materials Transportation Skills	✓	HTC Trainer	Houston	Initial	
ET 176	Driver Safety Training (including vehicle inspections and exempt log training)	✓	HTC Trainer	Houston	Initial	
ET 237	Drum Inspection and Closure	✓	HTC Trainer	Houston	Initial	
HS 104	8 Hour HAZWOPER Refresher	✓	H & S Mgr., Regulatory Compliance Mgr., or SK Certified instructor	Branch	Annual	
HS 201	Forklift Operation	Forklift Operators Only	Qualified Trainer or H & S Manager	Branch	Initial	
HS 203	Bloodborne Pathogens	One person per branch (see note 3)	Qualified Trainer	Branch	Annual (can be part of HAZWOPER refresher)	
HS 108a	Red Cross CPR		Red Cross Certified instructor	Branch	Annual	
HS 108b	Red Cross First Aid		Red Cross Certified instructor	Branch	Triennial	
HMTS_RE	Hazardous Materials Transportation Skills	✓	Regulatory Compliance Mgr., Transportation Compliance Manager, or SK Certified instructor	Branch	Triennial	
ET 140	RCRA Update (permitted locations only)	✓	Qualified Trainer, Regulatory Compliance Mgr., or Environmental Compliance Mgr.	Branch	Annual	
ET 155	Management of Used Oil	✓	Authorized Trainer, Regulatory Compliance Mgr., H & S Mgr., Environmental Compliance Mgr., or Transportation Compliance Manager	Branch	Initial	
ET 170	Cargo Tank Operations	See note 1	Qualified Trainer, Transportation Compliance Mgr., or SK Certified instructor	Branch	Initial	
ET 171	Cargo Tank Operations	✓	Qualified Trainer, Transportation Compliance Mgr	Branch	Triennial	
ET 176	Driver Safety Training (including vehicle inspections and log training)	✓	Qualified Trainer or Transportation Compliance Mgr.	Branch	Triennial	
ET 237	Drum Inspection and Closure	✓	Qualified Trainer, Regulatory Compliance Mgr., H & S Mgr., Environmental Compliance Mgr., or Transportation Compliance Manager	Branch	Triennial	
ET 333	Rail Tank Car Procedures	See note 2	Certified Trainer, Transportation Compliance Mgr., or SK Certified instructor	Branch	Initial, Triennial	

*HS_101HTC includes HS_110 Safe Procedures for Material Handling
**HMTS at HTC includes ET_120 Load Securement

Notes: (1) Required only if employee operates a cargo tank trailer, vacuum tank truck, or oil tank truck.
(2) Required only if employee is involved in rail tank car inspections or operations.
(3) At least one person per shift shall be trained in first aid and CPR. A first aid responder shall be available at all times.

Checklist of Required and Recommended Training

Employee Name: Branch:

Job Title: Job Start Date:

Lead Material Handler

Material Handler

Code	Description	Req'd	Delivered By	Where	When	Date Completed
HS 101; HS 101HTC*	24 Hour HAZWOPER	✓	HTC Trainer	Houston	Initial	
HS 107A	Controlled Substance Employee	✓	Training Handout	Houston	Initial	
HS 110*	Safe Procedures for Material Handling	✓	Qualified Trainer, H & S Mgr., or Regulatory Trainer	Branch or Houston	Initial	
HMTS**	Hazardous Materials Transportation Skills	✓	Certified Trainer	Houston	Initial	
ET 237	Drum Inspection and Closure	✓	Qualified Trainer	Houston	Initial	
HS 104	8 Hour HAZWOPER Refresher	✓	H & S Mgr., Regulatory Compliance Mgr., or SK Certified instructor	Branch	Annual	
HS 201	Forklift Operation	✓	Qualified Trainer or H & S Mgr.	Branch	Initial	
HS 203	Bloodborne Pathogens	One person per branch (see note 3)	Qualified Trainer	Branch	Annual (can be part of HAZWOPER refresher)	
HS 108a	Red Cross CPR		Red Cross Certified instructor	Branch	Annual	
HS 108b	Red Cross First Aid		Red Cross Certified instructor	Branch	Triennial	
ET 140	RCRA Update (permitted locations only)	✓	Qualified Trainer, Regulatory Compliance Mgr., or Environmental Mgr.	Branch	Annual	
ET 237	Drum Inspection and Closure	✓	Regulatory Compliance Mgr., Environmental Compliance Mgr., Transportation Compliance Mgr., or H & S Mgr.	Branch	Triennial	
HMTS_RE	Hazardous Materials Transportation Skills	✓	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Certified instructor	Branch	Triennial	

Notes: (3) At least one person per shift shall be trained in first aid and CPR. A first aid responder shall be available at all times.

*HS_101HTC includes HS_110 Safe Procedures for Material Handling
**HMTS at HTC includes ET_120 Load Securement

Checklist of Required and Recommended Training

Employee Name: Branch:

Job Title: Job Start Date:

Branch General Manager

Code	Description	Req'd	Delivered By	Where	When	Date Completed
HS 101; HS 101 HTC*	24 Hour HAZWOPER	✓	HTC Trainer	Houston	Initial	
HMTS**	Hazardous Materials Transportation Skills	✓	HTC Trainer	Houston	Initial	
ET 176	Driver Safety Training (including vehicle inspections and exempt log training)	✓	Qualified Trainer	Houston	Initial	
ET 237	Drum Inspection and Closure	✓	Qualified Trainer	Houston	Initial	
HS 104	8 Hour HAZWOPER Refresher	✓	H & S Mgr., Regulatory Compliance Mgr., or SK Certified instructor	Branch	Annual	
HS 107b	Controlled Substance Abuse Training for Supervisors	✓	H & S Mgr., or SK Certified Instructor	Branch	Initial	
HS 151	Accident Investigation	✓	H & S Mgr., or SK Certified instructor	Branch	Initial	
HS 203	Bloodborne Pathogens	One person per branch (see note 3)	Qualified Trainer	Branch	Annual (can be part of Hazwoper refresher)	
HS 108a	Red Cross CPR		Red Cross Certified instructor	Branch	Annual	
HS 108b	Red Cross First Aid		Red Cross Certified instructor	Branch	Triennial	
PT 300	Loss Control Management		H & S Manager	Branch	Initial	
HMTS _RE	Hazardous Materials Transportation Skills	✓	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Certified instructor	Branch	Triennial	
ET 140	RCRA Update (permitted locations only)	✓	Qualified Trainer or Environmental Compliance Mgr.	Branch	Annual	
ET 237	Drum Inspection and Closure	✓	Qualified Trainer, Regulatory Compliance Mgr., Environmental Compliance Mgr., Transportation Compliance Mgr., or H & S Mgr.	Branch	Triennial	
ET 330	Shipping Hazardous Material Samples	✓	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Qualified instructor	Branch	Initial, Triennial	

Notes: (3) At least one person per shift shall be trained in first aid and CPR. A first aid responder shall be available at all times.

Checklist of Required and Recommended Training

Branch Secretary and Lead Secretary

Employee Name: Branch:

Job Title: Job Start Date:

Code	Description	Req'd	Delivered By	Where	When	Date Completed
HS 106	Health and Safety for Admin.	✓	Qualified Trainer or H & S Manager	Branch	Initial / Annual	
HS 107A	Controlled Substances Employee	✓	Employee Handout	Branch	Initial	
HS 203	Bloodborne Pathogens	One person per Branch (see note 3)	Qualified Trainer	Branch	Annual (can be part of HAZWOPER refresher)	
HS 108a	Red Cross CPR		Red Cross Certified instructor	Branch	Annual	
HS 108b	Red Cross First Aid		Red Cross Certified instructor	Branch	Triennial	
HMTS**	Hazardous Materials Transportation Skills	See note 2	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Certified instructor	Branch	Initial	
HMTS_RE	Hazardous Materials Transportation Skills	See note 2	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Certified instructor	Branch	Triennial	
ET 140	RCRA Update (permitted locations only)	✓	Qualified Trainer, Regulatory Compliance Mgr., or Environmental Compliance Mgr.	Branch	Annual	
ET 330	Shipping Hazardous Material Samples	See note 1	Regulatory Compliance Mgr., Transportation Compliance Mgr., or SK Qualified instructor	Branch	Initial, Triennial	

**HMTS at HTC includes ET_120 Load Securement

Notes: (1) Required only if employee is involved in shipping samples.

(2) Required only if employee is involved in manifesting or transportation paperwork

(3) At least one person per shift shall be trained in first aid and CPR. A first aid responder shall be available at all times.

Checklist of Required and Recommended Training

Employee Name: Branch:

Job Title: Job Start Date:

Customer Service Rep (all except Oil & Vac)

Regulatory Training

Code	Description	Req'd	Delivered By	Where	When	Date Completed
HS 101; HS 101HTC*	24 Hour HAZWOPER	✓	HTC Trainer	Houston	Initial	
HS 107A	Controlled Substance Employee Driver Version	✓	Employee Handout	Houston	Initial	
HS 110*	Safe Procedures for Material Handling	✓	Qualified Trainer H & S Mgr..	Branch or Houston	Initial	
HMTS**	Hazardous Materials Transportation Skills	✓	HTC Trainer	Houston	Initial	
ET 176	Driver Safety Training (including vehicle inspections and exempt log training)	✓	HTC Trainer	Houston	Initial	
ET 237	Drum Inspection and Closure	✓	HTC Trainer	Houston	Initial	
HS 104	8 Hour HAZWOPER Refresher	✓	H & S Mgr., Regulatory Compliance Mgr., or Certified instructor	Branch	Annual	
HS 201	Forklift Operation	Forklift Operators Only	Qualified Trainer or H & S Mgr.	Branch	Initial	
HS 203	Bloodborne Pathogens	One person per branch (see note 3)	Qualified Trainer	Branch	Annual (can be part of Hazwoper refresher)	
HS 108a	Red Cross CPR		Red Cross Certified instructor	Branch	Annual	
HS 108b	Red Cross First Aid		Red Cross Certified instructor	Branch	Triennial	
HMTS_RE	Hazardous Materials Transportation Skills	✓	Regulatory Compliance Mgr., Environmental Compliance Mgr., Transportation Compliance Mgr., or SK Certified instructor	Branch	Triennial	
ET 140	RCRA Update (permitted locations only)	✓	Qualified Trainer, Regulatory Compliance Mgr., or Environmental Compliance Mgr.	Branch	Annual	
ET 176	Driver Safety Training (including vehicle inspections and exempt log training)	✓	Qualified trainer or Transportation Compliance Manager	Branch	Triennial	
ET 237	Drum Closure	✓	Qualified Trainer, Regulatory Compliance Mgr., H & S Mgr., Environmental Compliance Mgr., or Transportation Compliance Manager	Branch	Triennial	

Notes: (3) At least one person per shift shall be trained in first aid and CPR. A first aid responder shall be available at all times.

*HS_101HTC includes HS_110 Safe Procedures for Material Handling
**HMTS at HTC includes ET_120 Load Securement

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Systems, Inc. Service Center, 2720 Girard Boulevard, NE, Albuquerque, New Mexico (4/03)

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
1. PROJECT COORDINATION AND SCHEDULING				
Prime Contractor Costs				
· Coordinate activities with subcontractor prior to implementing closure	Project Manager	$82	4	$328
· Coordinate scope and schedule of project activities with owner/operator, decontamination contractor, regulatory agencies and analytical lab	Project Manager	$82	2	$164
· Review facility permit and closure plan	Project Engineer	$82	2	$164
	Field Supervisor	$58	2	$116
· Prepare project/site specific Health and Safety Plan	Health/Safety Specialist	$82	6	$492
· Prepare project activity and project status reports	Project Manager	$82	2	$164
· Prepare notification letters to appropriate State agencies	Project Manager	$82	2	$164
· Office Expenses		$100	1	$100
· Miscellaneous Expenses		$100	1	$100
Activity 1. Subtotal				$1,792

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Systems, Inc. Service Center, 2720 Girard Boulevard, NE, Albuquerque, New Mexico (4/03)

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
2. MOBILIZE TO SITE AND PREPARE FOR CLOSURE				
Assumptions				
· Waste mineral spirits tank is full (12,000 gallons)				
· Permitted capacity of CSAs (16,640 gallons) in 303 55 gallon drums				
· Generator knowledge and manifests used for disposal/treatment of waste mineral spirits and drummed wastes				
· Cost for one waste characterization sample included for unknown waste as a conservative assumption				
Prime Contractor Costs				
· Project Management and Supervision and participate in on-site coordination meeting with owner/operator and subcontractors	Project Manager/Engineer	$82	4	$328
	Vehicle (per day)	$50	0.5	$25
	Per diem	$100	0.5	$50
	Travel	$650	LS	$650
· Supervise waste loading activities	Field Supervisor	$58	8	$464
· Collect representative waste characterization sample of drummed wast	Vehicle (per day)	$50	1	$50
	Per diem	$100	1	$100
	Travel	$650	LS	$650
Subcontractor Costs				
· Subcontractor mobilization		$8,500	LS	$9,350
· Transfer tank contents to tankers	Labor/equipment/expenses	$1,000	LS	$1,100
· Transport waste mineral spirits to a TSD for treatment/disposal				
Assumes 2 tanker trailers required to remove 12,000 gallons				
Estimated Tanker Trailer Cost = $51.22/hr				
Estimated Driver Cost = $29.71/hr				
Estimated mileage/drive time (884 miles x 18 hours/trip)	Labor/equipment/drive time	$1,457	2	$3,205
Estimated disposal/treatment cost (per gallon)	TSD	$1.01	12000	$12,120
· Transfer drums in CSA to trucks	Labor/equipment/expenses	$3,000	LS	$3,300
· Transport drums to TSD for Treatment/Disposal				
Assumes 4 trucks to transport 303 drums				
Estimated Box Trailer Cost = $51.22/hr				
Estimated Driver Cost = $29.71/hr				
Estimated mileage/drive time (884 miles = 18 hours per trip)	Labor/equipment/drive time	$1,457	4	$5,828
Estimated disposal/treatment cost (per drum)	TSD	$106	302	$32,012
Laboratory Subcontractor Costs				
· Waste characterization sample analysis		$320	1	$352
Waste characterization analysis to consist of TCLP VOCs, SVOCs (excluding pesticides/herbicides) and metals				
Activity 2. Subtotal				$69,584

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Systems, Inc. Service Center, 2720 Girard Boulevard, NE, Albuquerque, New Mexico (4/03)

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
3. STORAGE TANK/CONTAINMENT AREA DECONTAMINATION AND TANK REMOVAL				
Assumptions:				
- The tank, piping and appurtenant equipment are removed and scrapped				
- Rinsate sampling is not necessary because the tank will be scrapped				
- 1 day to decontaminate AST, 1 day to decontaminate containment and 1 day to remove and scrap AST (3 days total)				
- Containment area decontaminated and remains in place following closure				
- No lapses of integrity found during the inspection of the containment area				
Prime Contractor Costs				
- Project Management and Supervision	Project Manager/Engineer	$82	4	$328
- Conduct Integrity Inspection of Containment Area (NM P.E. or designee	Project Manager/Engineer	$82	4	$328
	Vehicle (per day)	$50	1	$50
	Per diem	$100	1	$100
- Supervise Storage Tank Decontamination and Removal Activities	Field Supervisor	$58	16	$928
	Vehicle (per day)	$50	2	$100
	Per diem	$100	2	$200
- Supervise Containment Area Decontamination	Field Supervisor	$58	8	$464
	Vehicle (per day)	$50	1	$50
	Per diem	$100	1	$100
- Collect sample of final rinsate from containment area and submit samples for laboratory analysis	Field Supervisor	$58	4	$232
	Vehicle (per day)	$50	0.5	$25
	Per diem	$100	0.5	$50
	Sample supplies/shipping	$150	LS	$150
Subcontractor Costs				
- Disconnect electrical appurtenances	Labor/equipment	$350	LS	$385
- Decontaminate waste AST, piping and appurtenant equipment	Labor/equipment/expenses	$2,500	LS	$2,750
Wash/triple rinse tank with high pressure spray				
Remove wash/rinse water, containerize in drums				
Cost for transportation and wash water disposal included in activity 7 below				
Subcontractor cost includes all necessary equipment, safety equipment, PPE and labor to complete activity tasks				
- Decontaminate Tank Containment Area	Labor/equipment/expenses	$900	LS	$990
Wash/triple rinse tank with high pressure spray				
Remove wash/rinse water, containerize in drums				
Cost for transportation and wash water disposal included in activity 7 below				
Subcontractor cost includes all necessary equipment, safety equipment, PPE and labor to complete activity tasks				
- Transport and Demolish AST	Labor/equipment/expenses	$2,500	LS	$2,750
Laboratory Subcontractor Costs				
- Analyze 1 rinsate sample from containment area for VOCs	VOCs @ $100/sample	$100	1	$110
Activity 3. Subtotal				$10,090

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Systems, Inc. Service Center, 2720 Girard Boulevard, NE, Albuquerque, New Mexico (4/03)

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
4. DECONTAMINATE AND DEMOLISH THE RETURN/FILL STATION				
Assumptions:				
· Washing shall consist of washing with detergent/water solution and rinsing with high-pressure spray				
· The R/F (with the exception of the drum washer) shall be scrapped				
· Drum washer shall be removed from the R/F and staged within the warehouse				
· Rinsate samples required for drum washer (1) for VOCs				
· Includes decontamination of metal containment pans and disposal as scrap metal				
· Cost for recycling return/fill station components as scrap metal included with the waste AST in Activity 3 above.				
· No lapses of integrity found during the inspection of the containment area				
Prime Contractor Costs				
· Supervise and document removal of residual sludges (if necessary) from the drum washer and	Field Supervisor	$58	6	$348
	Vehicle (per day)	$50	1	$50
· Supervise washing of R/F Station and associated components (i.e. piping, pumps, and appurtenances)	Per diem	$100	1	$100
· Document removal of R/F Station (except for drum washer) and and coordinate with demolition contractor to provide certificate of destruction	Field Supervisor	$58	8	$464
	Vehicle (per day)	$50	1	$50
	Per diem	$100	1	$100
· Conduct integrity inspection of containment (NM PE or designate)	Project Manager/Engineer	$82	4	$328
	Vehicle (per day)	$50	0.5	$25
	Per diem	$100	0.5	$50
· Collect rinsate samples from drum washer for analysis of VOCs	Field Supervisor	$58	3	$174
	Vehicle (per day)	$50	0.5	$25
	Per diem	$100	0.5	$50
	Sample supplies/shipping	$150	LS	$150
Subcontractor Costs				
· Remove residual sludge from drum washer, decontaminate drum washers, grating, containment and structure	Labor/equipment/expenses	$2,500	LS	$2,750
Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc., and rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums Cost for transportation and disposal of drums included in Activity 7 below.				
Laboratory Subcontractor Costs				
· Analyze 1 rinsate samples from return/fill station (drum washers) for V VOCs @ $100/sample		$100	1	$110
Activity 4. Subtotal				$4,774

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Systems, Inc. Service Center, 2720 Girard Boulevard, NE, Albuquerque, New Mexico (4/03)

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
5. DECONTAMINATE TWO CONTAINER STORAGE AREAS				
Assumptions:				
· Assumes CSAs total approximately 2056 sq. ft with typical containment trench and curbing				
· Decontamination shall consist of washing with a detergent water solution and rinsing with a high-pressure spray				
· CSA to remain in-place following closure				
· Decontamination of CSA includes floor, curbing and containment trenches, and requires approximately 1/2 day				
· No lapses of integrity found during the inspection of the containment area				
Prime Contractor Costs				
· Inspect the floor of CSA for cracks, gaps, or other potential lapses of integrity (ID P.E. or designee)	Project Manager/Engineer	$82	2	$164
· Fill cracks and gaps (if necessary) prior to implementing decontamination activities	Vehicle (per day)	$50	1.0	$50
	Per diem	$100	1.0	$100
· Supervise and document decontamination of CSAs	Field Supervisor	$58	2	$116
	Vehicle (per day)	$50	1.0	$50
	Per diem	$100	1.0	$100
· Collect sample of final rinsate from CSA and submit for laboratory analysis	Field Supervisor	$58	1	$58
	Vehicle (per day)	$50	1.0	$50
	Per diem	$100	1.0	$100
	Sample supplies/shipping	$450	LS	$150
Subcontractor Costs				
· Decontaminate 1 container storage area	Labor/equipment/expenses	$5,000	LS	$5,500
Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc., and rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums Cost for transportation and disposal of drums included in Activity 7 below.				
Laboratory Subcontractor Costs				
· Analyze 1 rinsate sample from CSA for VOCs	VOCs @ $100/sample	$100	3	$330
Activity 5. Subtotal				$6,768
6. DECONTAMINATE ONE FLAMMABLE STORAGE SHELTER (Included with 5, above)				

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Systems, Inc. Service Center, 2720 Girard Boulevard, NE, Albuquerque, New Mexico (4/03)

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
7. COLLECT SOIL SAMPLES FROM PERMITTED UNITS				
Assumptions: · No lapses of integrity noted by Registered Engineer · Soil Samples collected with hand auger, jack hammer or coring device				
Prime Contractor Costs				
· Coordinate sample collection with field personnel and laboratory	Project Manager/Engineer	$82	2	$164
· Collect soil samples (10 total) (two under USTs, two under each CSA, two under R&F)	Field Supervisor	$58	10	$580
	Vehicle (per day)	$50	1.0	$50
	Per diem	$100	1.0	$100
Subcontractor Costs				
· Laboratory Costs for Analysis of 6 Soil Samples (VOCs, SVOCs and RCRA Metals)	Labor/equipment/expenses	$410	10	$4,100
Activity 7. Subtotal				$4,994

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Systems, Inc. Service Center, 2720 Girard Boulevard, NE, Albuquerque, New Mexico (4/03)

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
8. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				
Assumptions:				
· 2,000 gallons wash water generated from decontamination of return/fill station and waste UST (including residual sludge) = 38 drums				
· 75 gallons sludge removed from drum washers = 2 drums				
· 750 gallons of wash water generated from decontamination of CSA = 15 drums				
· PPE, plastic sheeting, consumables contained in 10 drums				
· 21 mineral spirits wash water drums, 15 CSA wash water drums, and 5 misc. = 41 drums total				
· Waste characterization samples not necessary for wash/water disposal; disposed as waste mineral spirits and/or waste codes associated with CSA and paint waste shelter				
Prime Contractor Costs				
· Ensure drums are properly labeled, coordinate pick up and disposal	Project Manager/Engineer	$82	4	$328
	Vehicle (per day)	$50	1.0	$50
	Per diem	$100	1.0	$100
· Purchase 106 55-gallon drums	Drums @ $35 each	$35	106	$3,710
Subcontractor Costs				
· Transfer drums in CSA to trucks	Labor/equipment/expenses	$1,500	LS	$1,650
· Transport drums to TSD for Treatment/Disposal				
Assumes 2 trucks to transport 106 drums				
Estimated Box Trailer Cost = $51.22/hr				
Estimated Driver Cost = $29.71/hr				
Estimated mileage/drive time (884 miles = 18 hours per trip)	Labor/equipment/drive time	$1,457	2	$2,914
Estimated disposal/treatment cost/drum for mineral spirits wash	TSD (based on $0.85/gallon)	$47	56	$2,618
Estimated disposal/treatment cost/drum for CSA wash water and	TSD	$106	50	$5,300
Activity 8. Subtotal				$16,670

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Systems, Inc. Service Center, 2720 Girard Boulevard, NE, Albuquerque, New Mexico (4/03)

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
9. CLOSURE CERTIFICATION REPORT				
Assumptions:				
· Closure certification report signed by an New Mexico-Registered P.E. and owner/operator				
· Confirmation rinsate meet closure criteria				
Prime Contractor Costs				
· Compile field notes and photographs	Project Manager/Engineer	$82	2	$164
	Field Supervisor	$58	4	$232
· Review and compile rinsate and soil data into summary tables	Project Manager/Engineer	$82	12	$984
· Prepare closure certification statement	Project Manager/Engineer	$82	2	$164
· Summarize closure procedures, activities and results in a brief report	Project Manager/Engineer	$82	16	$1,312
· Office Expenses	Drafting/Clerical	$400	1	$400
· Miscellaneous Expenses	Copying/Postage	$100	1	$100
Activity 9. Subtotal				$3,356

COST ESTIMATE ACTIVITIES SUMMARY	
1. PROJECT COORDINATION AND SCHEDULING	$1,792
2. MOBILIZE TO SITE AND PREPARE FOR CLOSURE	$69,584
3. STORAGE TANK/CONTAINMENT AREA DECONTAMINATION AND TANK REMOVAL	$10,090
4. DECONTAMINATE AND DEMOLISH THE RETURN/FILL STATION	$4,774
5. DECONTAMINATE TWO CONTAINER STORAGE AREAS	$6,768
6. DECONTAMINATE ONE FLAMMABLE STORAGE SHELTER	
7. SOIL SAMPLING	$4,994
8. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES	$16,670
9. CLOSURE CERTIFICATION REPORT	$3,356
TOTAL CLOSURE COST ESTIMATE	$118,028

Notes:
- Prime Contractor labor rates and expenses are actual 2002 rates charged by S-K subcontractor
- Prime Contractor labor rates include overhead and profit
- Assumes mobilization of project manager/engineer and field supervisor to oversee closure activities. Prime contractor travel included in Activity 2
- Per diem includes lodging ($75/night) and meals ($25/day)
- Subcontractor Rate for decontamination activities provided by Environmental Contractor located in Glenwood, Iowa
- Laboratory Subcontractor Rate Obtained From STL, Denver Schedule of Charges
- Subcontractor rates or prices include each subcontractors own overhead and profit markup
- Subcontractor prices include lodging and per diem for crew, and necessary equipment to perform the specified tasks in each activity
- Unit Cost for Truck with Trailer and Driver obtained from RS Means Environmental Remediation Cost Data, 7th Edition 2001, (COETI) 1truck $38.86 + trailer $15.63 = $54.49 x location factor (0.94) = $51.22. Unit Cost for Driver = $23.95 x location factor 0.94 = $22.51 + 10% profit + 20% overhead = $29.71
- Distance from Farmington to Reedly, CA obtained from MapQuest (est. 885 miles and 16 hrs 35 min drive time). Drive time increased to 18 hours per trip to account for Port of Entry delays
- A 10% markup was applied to subcontractor prices, excluding waste disposal, which is being managed through a Safety-Kleen Recycle Center
- Waste mineral spirits disposal/treatment unit cost obtained from Safety-Kleen, Reedly Recycle Center. Assumes waste is transported by tanker truck to Reedly, CA. The price for disposal includes transportation of the waste from the Reedly Recycle Center to Clarksville, MO for treatment/disposal. The TSD unit cost in Activity 3 and Activity 8 includes transportation, treatment and disposal of mineral spirits waste.
- Drummed waste disposal/treatment unit cost obtained from Environmental Technology Council, Commercial Incinerator Prices January 2002, and includes a conservative estimate of the average cost for drummed non-halogen liquid.

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Greenwich Insurance Company, (the "Insurer"), of Seaview House, 70 Seaview Avenue, Greenwich, CT 06902-6040 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Safety-Kleen Systems, Inc., (the "insured"), of 1301 Gervais Street, Suite 300, Columbia, SC 29201 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.17 or 265.147. The coverage applies at:

   (SEE ATTACHED LIST) (NEW MEXICO)

   for sudden accidental occurrences. The limits of liability are $2 million per each occurrence with an annual aggregate of $2million, exclusive of legal defense costs. The coverage is provided under policy number PEC000709901, issued on September 1, 2002. The effective date of said policy is September 1, 2002.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

   (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligation under the policy.

   (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

   (c) Whenever requested by the Secretary of the New Mexico Environment Department, the Insurer agrees to furnish to the Secretary a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage of its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the Secretary of the New Mexico Environment Department.

   (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of written notice is received by the Secretary of the New Mexico Environment Department.

I hereby certify that the wording of this instrument is, identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer in one or more States.

Joseph S Catanese

Joseph S. Catanese, Vice President
Authorized Representative of
Greenwich Insurance Company
c/o XL Environmental, Inc.
520 Eagleview Blvd.
Exton, PA 19341

SAFETY-KLEEN

STATE OF NEW MEXICO

Safety-Kleen Systems, Inc. 2720 Girard, NE Albuquerque, NM 87107	(7-008-01)	NMD000804294
Safety-Kleen Systems, Inc. 4200A Hawkins Road Farmington, NM 87401	(7-008-21)	NMD980698849

safety-kleen®

CERTIFIED MAIL 7600 0600 0023 8304 8641
RETURN RECEIPT REQUESTED

April 23, 2003

Robert Warder, PE
NMED - HWB
4131 Montgomery NE
Albuquerque, New Mexico 87109

RE: Class 1 modification for Safety-Kleen Systems, Inc., Albuquerque, New Mexico
EPA ID No.: NMD 000 804 294

Dear Mr. Warder,

In accordance with 40 CFR 270.42 (a), Safety-Kleen is submitting a class 1 modification to the subject facility's hazardous waste permit. The emergency notifications page of the contingency plan has been updated with new information for emergency coordinators.

The enclosed emergency notification page has been sent to everyone on the emergency notification page. Please provide us with a facility public notice mailing list, so we can send a notice to all interested parties. If you should have any questions please contact David Ashley at (602) 821-2422 or me at (505) 884-2277.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.

Sincerely,

Mike Crawford
Branch General Manager

cc: Facility Records
NMED - HWB
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303
Steve Luquire, Safety-Kleen
David Ashley, Safety-Kleen

safety-kleen®

CERTIFIED MAIL 7000 0600 0023 8304 8601
RETURN RECEIPT REQUESTED

April 23, 2003

Tony Hill
Safety Director
Presbyterian Hospital
1100 Central Avenue SE
Albuquerque, New Mexico 87106

Dear Mr. Hill:

Safety-Kleen operates a hazardous waste management facility at 2720 Girard Boulevard NE, Albuquerque 87107. Under 40 CFR 264.53, all revisions to a hazardous waste management facility's contingency plan must be provided to your office. Attached is Safety-Kleen's Contingency Plan. Please note especially the emergency contact list with updated facility personnel contact telephone numbers.

If you have any questions or desire to visit the facility, please contact David Ashley at (602) 821-2422 or me at (505) 884-2277.

Sincerely,

Mike Crawford

Mike Crawford
Branch General Manager

safety-kleen®

CERTIFIED MAIL 7000 0600 0023 8304 8603
RETURN RECEIPT REQUESTED

April 23, 2003

Liz Saavedra
Coordinator
Albuquerque Fire Department
11510 Sunset Gardens Road SW
Albuquerque, New Mexico 87121

Dear Ms. Saavedra:

Safety-Kleen operates a hazardous waste management facility at 2720 Girard Boulevard NE, Albuquerque 87107. Under 40 CFR 264.53, all revisions to a hazardous waste management facility's contingency plan must be provided to your office. Attached is Safety-Kleen's Contingency Plan. Please note especially the emergency contact list with updated facility personnel contact telephone numbers.

If you have any questions or desire to visit the facility, please contact David Ashley at (602) 821-2422 or me at (505) 884-2277.

Sincerely,

Mike Crawford
Branch General Manager

safety-kleen®

CERTIFIED MAIL 7000 0600 0013 8304 8597
RETURN RECEIPT REQUESTED

April 23, 2003

Andy Christian
Radio Control
Albuquerque Police Department
11510 Sunset Gardens Road SW
Albuquerque, New Mexico 87121

Dear Mr. Christian:

Safety-Kleen operates a hazardous waste management facility at 2720 Girard Boulevard NE, Albuquerque 87107. Under 40 CFR 264.53, all revisions to a hazardous waste management facility's contingency plan must be provided to your office. Attached is Safety-Kleen's Contingency Plan. Please note especially the emergency contact list with updated facility personnel contact telephone numbers.

If you have any questions or desire to visit the facility, please contact David Ashley at (602) 821-2422 or me at (505) 884-2277.

Sincerely,

Mike Crawford
Branch General Manager

safety-kleen®

CERTIFIED MAIL 7000 0600 0023 8304 8580
RETURN RECEIPT REQUESTED

April 23, 2003

Scott Gariss
Rinchem Company
6133 Edith NE
Albuquerque, New Mexico 87107

Dear Mr. Gariss:

Safety-Kleen operates a hazardous waste management facility at 2720 Girard Boulevard NE, Albuquerque 87107. Under 40 CFR 264.53, all revisions to a hazardous waste management facility's contingency plan must be provided to your office. Attached is Safety-Kleen's Contingency Plan. Please note especially the emergency contact list with updated facility personnel contact telephone numbers.

If you have any questions or desire to visit the facility, please contact David Ashley at (602) 821-2422 or me at (505) 884-2277.

Sincerely,

Mike Crawford
Branch General Manager

safety-kleen®

CERTIFIED MAIL 7000 0600 0023 8304 8573
RETURN RECEIPT REQUESTED

April 23, 2003

Sir / Madam
New Mexico Poison and Drug Information Center
1 University of New Mexico
MSC 09 5080
Albuquerque, New Mexico 87131-0001

Dear Sir / Madam:

Safety-Kleen operates a hazardous waste management facility at 2720 Girard Boulevard NE, Albuquerque 87107. Under 40 CFR 264.53, all revisions to a hazardous waste management facility's contingency plan must be provided to your office. Attached is Safety-Kleen's Contingency Plan. Please note especially the emergency contact list with updated facility personnel contact telephone numbers.

If you have any questions or desire to visit the facility, please contact David Ashley at (602) 821-2422 or me at (505) 884-2277.

Sincerely,

Mike Crawford
Branch General Manager

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)

Update: 12-30-2002

EMERGENCY INFORMAI'ION

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: 9100 Surrey Rd NE Albuquerque, NM. 87109

Telephone:
Office (505) 884-2277
Home (505) 822-0077
Cell Phone (505)401-1050

Alternate Emergency Coordinator

Name: Danny Evans
Title: Customer Service Manager
Address: 1108 Dakota SE
Albuquerque, NM. 87108

Telephone:
Office (505)884-2277
Home (505)262-2589
Cell Phone (505) 991-1087

Alternate Emergency Coordinator

Name: Ivan Herrera
Title: Branch Sales Specialist
Address: 2912 Santa Cruz SE
Albuquerque, New Mexico 87108

Telephone:
Office (505) 884-2277
Home (505)232-2527
Mobile (505) 228-5677

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

D. Internal (Branch Paging System)

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

06 Outside Speakers	13 Front Office
10 EHS Manager	15 Branch Manager
21 Customer Svc Mgr	26 Computer Room

	(Clean-Up Contractor)	24 Hour	(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
24 BIM	26 Computer Room
25 Sales Rep Room	21 Special Markets

4.0 CONTINGENCY PLAN

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

F.1 PURPOSE

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

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

F.2 EMERGENCY COORDINATOR RESPONSIBILITIES

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

The emergency coordinator and his alternate must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Attachment F. Also listed in Attachment F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation.

F.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his alternate when the emergency coordinator is not available) must immediately:

a. activate the internal facility communication system to notify all facility personnel;

b. notify Safety-Kleen's Environment, Health and Safety Department using the 24-hour telephone number after working hours - 800/468-1760; and

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.

F.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

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

b. 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:

(1) name and telephone number of notifier;

(2) name and address of facility;

(3) time and type of incident (e.g., release, fire);

(4) name and quantity of material(s) involved, to the extent known;

(5) the extent of injuries, if any; and

(6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen 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 facility.

The emergency coordinator must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 30 days of the incident, Safety-Kleen will 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 include:

a. name, address, and telephone number of the owner or operator;

b. name, address, and telephone number of the facility;

c. date, time, and type of incident (e.g., fire, explosion);

d. name and quantity of material(s) involved;

e. the extent of injuries, if any;

f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and

g. estimated quantity and disposition of recovered material that results from the incident.

F.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

a. The person who discovers/causes the spill reports to the emergency coordinator.

b. The emergency coordinator contacts the Environment, Health and Safety Dept.

c. The Environment, Health and Safety Department reports to the New Mexico Environment Department.

F.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
New Mexico HED	Report releases, fires, and explosions.
Rinchem	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

F.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections which follow.

F.3.1 Minor Spills

If a spill should occur while pouring spent solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on a paved area, it must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to the Safety-Kleen recycle center for proper disposal.

b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. The worker will enter the area wearing rubber gloves, aprons, safety glasses, and/or a respirator, collect the liquid, drum it and return it to storage. An explosion proof area is one in which special wiring has been used. Only the return and fill station contains this type of wiring.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Environment, Health and Safety Department and the department will contact the New Mexico Environment Department (if the spill is of a reportable quantity).

In the event a container needs emptying, a pump located on the facility will be used to remove the liquid and pump it to a new container. In the event liquid from a tank needs to be removed, tanker trucks will be used to remove the liquid and haul it to the recycle center. A wet/dry vacuum is present at the site to be used in the event of a minor spill. Sorbent pads can also be used to wipe up any minor spills.

F.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, 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.

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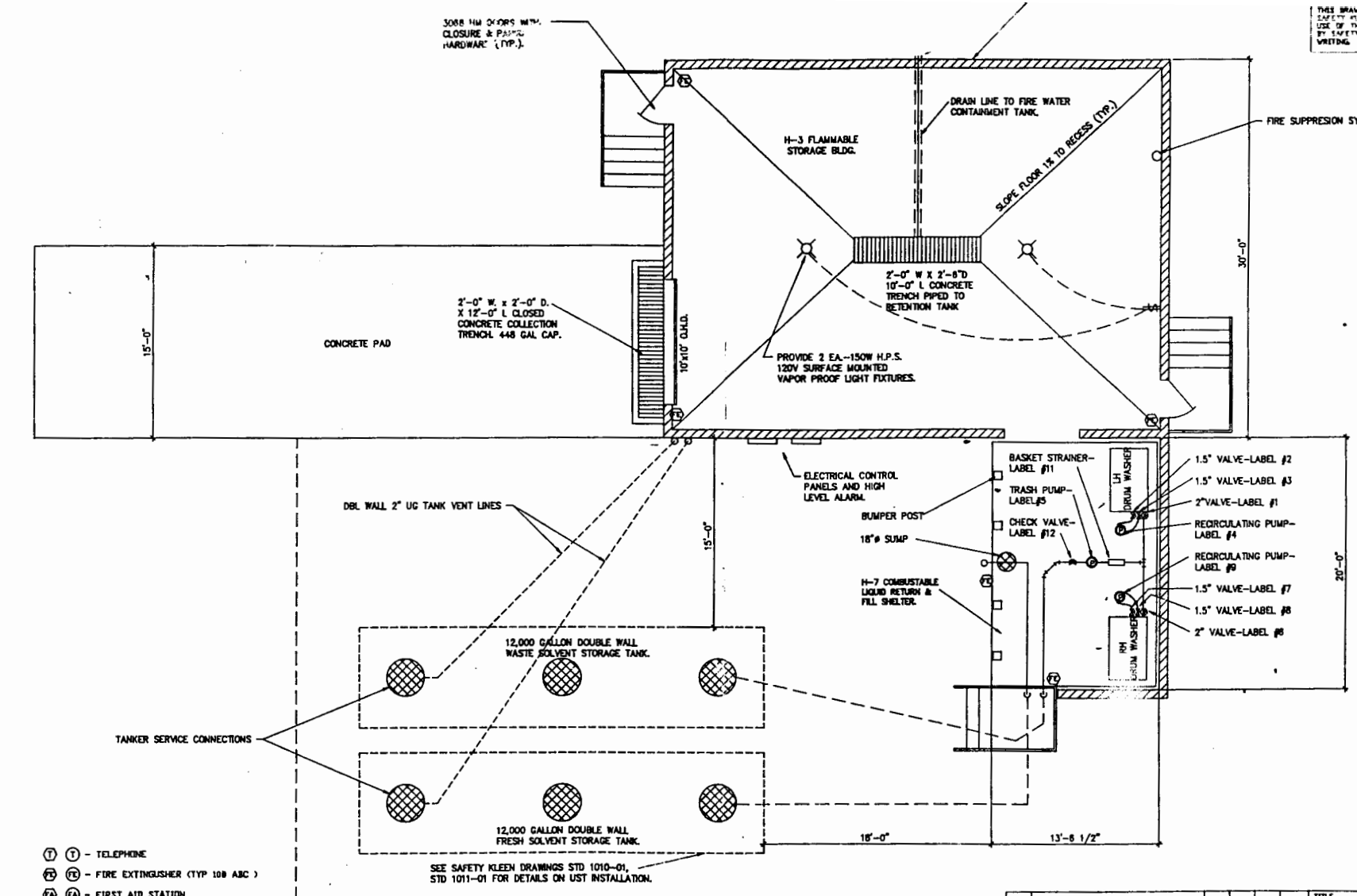

NO.	DESCRIPTION	BY	CHK	APPR	DATE
	ADDED VALVE LABELING	AJ			8-30-92
00	REVISED SAFETY KLEEN DRAWING TO CAD AS DATED. REPLACES SAFETY KLEEN DRAWING D-10485.				11/90

REVISIONS

PLOT DATE: 8-30-92

TITLE

FLOOR PLAN
2720 GIRARD AVE.

SAFETY-KLEEN CORP.
777 [illegible] ROAD ELGIN, ILLINOIS [illegible] PHONE [illegible]

SCALE	BY	CHKD	P.E. APPR	OP. APPR	DATE
1/4"=1'-0"	VET				3/18/90

SERVICE CENTER STANDARDS

ALBUQUERQUE, N.M.

STD-SVC-REV NO.

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