

Barry Birch

From: Pomonis, Keith [Keith.Pomonis@Safety-Kleen.com]
Sent: Tuesday, February 17, 2004 11:35 AM
To: Barry Birch
Subject: RE: ALB. Waste Min.

Importance: High

Mr. Birch,

In reply to your previous email I have gathered the information that you have requested. The Albuquerque branch has generated the following waste:

		2003	2002
Oil and Water Mix	1,100 lbs	4,668 lbs	
Oily Sludge	56,650 lbs	50,800 lbs	* This is the Vac truck heal cleanout and the amount is determined by the number of customers serviced.
Combustible Liquid	1,700 lbs	2,690 lbs	
Contaminated Debris	2,500 lbs	3,132 lbs	

All of these waste streams are sent to Safety-Kleen's recycle center in Denton, TX.

As you can see the waste stream amounts generated directly by the branch continue to lower. Safety-Kleen has a Waste Minimization team in effect investigating methods to ensure that branch generated waste continues to be minimized.

Please let me know if there is any additional information needed.

Sincerely,

Keith Pomonis
EHS Manager
480-748-5269

-----Original Message-----

From: Barry Birch [mailto:barry_birch@nmenv.state.nm.us]
Sent: Thu 2/5/2004 6:56 PM
To: Pomonis, Keith
Cc: Sandra Martin; Evans, Danny
Subject: RE: ALB. Waste Min.

In addition to your producing a certificate that a waste minimization program is in place in accordance with 264.73(b)(9), I draw your attention to 262.41(6)&(7). Therein you must not only certify a program in place, but you must further describe the efforts undertaken to reduce the volume and toxicity of waste generated (as a LQG reporting in the Biennial Report). Also you must describe the changes achieved during the year in comparison to previous years. This is just what I previously requested.

I am anxious to see you meet the schedule of compliance with your NOV without delay. If you have the documentation, already, it should be a simple matter of submission. If you do not, you will want to prepare it and submit it in a timely manner so that it will be available for comparison with next year's report, recognizing that a second occurrence of this violation would constitute conditions of a "significant non complier".

Secondly, if you will submit a copy of your procedures for field testing used oil, I shall try to give you a timely answer. I think your procedures are adequate, but I need to verify the details, particularly as they relate to your self-protection. Have you considered testing, or do you already test, the bulk storage oil before it is shipped from your facility?

Barry S. Birch

-----Original Message-----

From: Pomonis, Keith [mailto:Keith.Pomonis@Safety-Kleen.com]
Sent: Tuesday, January 20, 2004 5:57 PM
To: barry_birch@nmenv.state.nm.us
Cc: Evans, Danny
Subject: FW: ALB. Waste Min.

Mr. Birch,

The Safety-Kleen branches are commercial facilities that receive waste from customers to be recycled. The waste that is generated by these branches is a result from the recycling of the waste received, therefore the volume and types of waste received determine the toxicity and volume of the waste generated at the branches.

In accordance with 40 CFR 264.73(b)(9), The Albuquerque facility has annual Waste Minimization Certifications on file and has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the permittee's facility operation to the degree determined to be economically practicable. In addition, the methods of treatment, storage or disposal currently available to this facility minimizes the present and future threat to human health and the environment.

Waste Minimization is a high priority within Safety-Kleen and is closely monitored by Environmental, Health and Safety Managers and branch personnel. Additionally, Safety-Kleen is in the process of becoming ISO 14001 certified.

I will gladly send you copies of Albuquerque's current Waste Minimization Certification if needed.

Please let me know if you have any additional questions or concerns.

Sincerely,

Keith Pomonis
EHS Manager
480-748-5269

-----Original Message-----

From: Evans, Danny
Sent: Wed 1/14/2004 4:42 PM
To: Pomonis, Keith
Cc:
Subject: FW: ALB. Waste Min.

Keith, can you give me direction in regards to this matter?

-----Original Message-----

From: Barry Birch [mailto:barry_birch@nmenv.state.nm.us]
Sent: Wednesday, January 14, 2004 2:47 PM
To: Danny Evans
Cc: Steve Pullen; Sandra Martin; Anna MAESTAS
Subject: RE: ALB. Waste Min.

Thank you for the information. The included document looks like a very good Corporate-level policy or set of Standard Operating Procedures. Now what I need to see is your implementation of the policy or SOP. Specifically, you need to demonstrate that you have actually minimized hazardous waste generation from last year to this year and from the previous year to last year, etc. Since you have introduced the CUP, I would suspect that you have actually increased your generation by accepting product from customers and turning it into waste after cleaning drums. The requirements for waste minimization listed in RCRA enforce the New Mexico Hazardous Waste Act in 74-4-4.A(2)(f) stating that the Board shall adopt regulations establishing standards for the implementation of programs to reduce the volume or quantity and toxicity of the hazardous waste generated. What you have given me shows the plan, but it does not indicate to me that it actually has been implemented by your facility by documenting reducing the volume or quantity and toxicity of the hazardous waste generated. I need this documentation as soon as possible, not to exceed fifteen (15) days, in order to verify correction of this violation.

Your immediate attention to this matter will be appreciated.

If your records require this message in a formal letter, let me know.

Barry S. Birch

-----Original Message-----

From: Danny Evans [mailto:Danny.Evans@safety-kleen.com]
Sent: Monday, January 12, 2004 3:00 PM
To: barry_birch@nmenv.state.nm.us
Subject: FW: ALB. Waste Min.

manager
Barry, Sorry for the delay. Here is the message I got from our EHS
(Keith Pomonis). If you have any questions please call me 505-884-2277. Thank
you, Danny Evans

-----Original Message-----

From: Pomonis, Keith [mailto:Keith.Pomonis@Safety-Kleen.com]
Sent: Monday, January 12, 2004 11:37 AM
To: Evans, Danny
Subject: ALB. Waste Min.

Danny,

Please let
This is the Waste Minimization Plan for the Albuquerque branch.
the state know that this is the same plan that is identified in our new Part
B permit that just went into effect. We had shown them an old plan that is
no longer being used during their last visit.

5269
If you have any additional questions give me a call at (480) 748-

Keith

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