



BILL RICHARDSON  
GOVERNOR

SKAL07

State of New Mexico  
**ENVIRONMENT DEPARTMENT**

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RON CURRY  
SECRETARY

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DEPUTY SECRETARY

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

February 20, 2007

Mr. Keith Pomonis  
EH&S Manager  
Safety-Kleen Systems, Inc.  
2790 East Camellia  
Gilbert, AZ 85296

**RE: APPROVAL OF REQUEST TO ELECTRONICALLY SCAN, STORE AND RETRIEVE MANIFESTS AND OTHER SHIPPING RELATED DOCUMENTS ALBUQUERQUE, NM SERVICE CENTER, EPA ID# NMD000804294 AND FARMINGTON, NM SERVICE CENTER, EPA ID# NMD980698849 HWB-SKAL-MISC AND HWB-SKFA-MISC**

Dear Mr. Pomonis:

The New Mexico Environment Department (NMED) has received your letter, dated December 18, 2006, in which you request that Safety-Kleen Systems, Inc. (S-K) be allowed to scan manifests and other shipping related documents in order to store, file, and retrieve them electronically.

NMED hereby approves that the electronic scanning and storage of manifests and other shipping documents complies with current RCRA and facility permit record retention and access requirements. This conclusion is based on the following conditions being met:

1. All original signed and dated manifests and other shipping related documents must be sent via registered mail (e.g. Federal Express or UPS) to a large, well-established document content management and processing company.
2. The imaging and availability period must be no more than ten (10) business days from the time that they are shipped until they are electronically available.
3. All documents must be scanned using IntelliScan – a Windows based application that will

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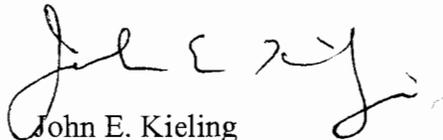
drive the scanner.

4. All indexed data must be stored in an Oracle database.
5. All images must be held in RAID (Redundant Array of Independent Disks) or NetApp (Network Appliance) devices.
6. The resolution of scanned images must be at least 200 DPI.
7. The disaster prevention/recovery plan must ensure that all images will be stored in two devices at two separate locations.
8. Hard copy distribution of manifests, as required by Section 8.2 of Attachment 8 of both of the facility permits, must not be impacted.

The key factors in this decision are that the generation and storage of image files must include handwritten signatures and dates; the inclusion of design and operating controls which ensure record accuracy, integrity and security; and the inclusion of indexing and file retrieval features which ensure reasonable inspector access. This approval applies to both S-K facilities (Albuquerque and Farmington) located in the State of New Mexico.

If you have any questions regarding this letter, please contact David Strasser at (505) 222-9526.

Sincerely,



John E. Kieling  
Program Manager  
Permits Management Program  
Hazardous Waste Bureau

JEK:dcs

cc: J. Bearzi, NMED HWB  
A. Vollmer, NMED HWB  
W. Moats, NMED HWB  
D. Strasser, NMED HWB  
L. King, EPA Region 6 (6PD-N)  
File: [REDACTED] 2007 and Reading  
HWB-SKAL-MISC and SKFA-MISC