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Governor

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NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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DAVE MARTIN
Cabinet Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 25, 2011

Randy Shaner
Environment, Health and Safety Manager
Safety-Kleen Systems, Inc.
2720 Girard Blvd. NE.
Albuquerque, NM 87107

**RE: APPROVAL WITH MODIFICATIONS
CLASS 1 (WITH PRIOR APPROVAL) PERMIT MODIFICATION
SAFETY-KLEEN, ALBUQUERQUE, NM, EPA ID# NMD000804294
HWB-SKAL-10-002**

Dear Mr. Shaner:

The New Mexico Environment Department (NMED) hereby approves, with modifications, Safety-Kleen Systems' (the Permittee's) September 15, 2010 request for a Class 1 (with prior approval) permit modification to the Albuquerque Storage Facility's RCRA Permit Number NMD000804294. The requested modifications are hereby approved, with the exception of the following:

Attachment 5, Section 5.1, New 6th and 7th Paragraphs

The NMED has added the following two paragraphs to the end of Section 5.1:

Safety-Kleen employees shall make inspections of the facility each operating day to detect any unauthorized entry to the Facility or any other abnormalities. The employees shall not rely upon inspection checklist entries to make the emergency coordinator aware of spills or other emergencies, but shall provide immediate verbal notification.

Operating day is defined as any business day when branch employees are handling or managing waste at the facility, including Saturdays, Sundays and holidays.

These two paragraphs were added to be consistent with the same modifications recently made to the Permittee's Permit for the Farmington Facility.

Attachment 5, Section 5.2.5, 1st Sentence

The NMED has modified this sentence to indicate that inspections of the return and fill station will be conducted every operating day (not weekly), consistent with the modified inspection form for the Hazardous Waste Storage Tank System (see the following).

Attachment 5, Attachment 5-1, Inspection Log Sheet (Daily Inspection of Hazardous Waste Storage Tank System)

The NMED has modified this log sheet by removing the term "weekly" from the UST Detection System Check. This check is required each operating day in accordance with modified Attachment 5, Sections 5.2, 5.2.1 and 5.2.5.

Attachment 6, Section 6.2.1, 2nd Paragraph, 2nd Sentence

The NMED has modified this sentence to add the following statement:

"... at the Facility, which shall be done no later than the next operating day following arrival at the Facility, containers of hazardous waste..."

This statement was added per the request of the Permittee in an e-mail to the NMED dated November 3, 2010.

Attachment 6, Section 6.2.5, 2nd Paragraph

With the exception of some minor typographical changes, the NMED declines to approve the requested modification to this paragraph regarding the provision of personal protective equipment (PPE). The intent of the existing paragraph is to clearly specify minimum PPE requirements at the Facility.

Attachment 6, Section 6.5, 7th Paragraph

The NMED has modified this paragraph to allow the storage of 55-gallon containers in the CSU three pallets high only if containers on all three pallets are tied together. The limited maneuvering space in the relatively small container storage buildings makes this a necessary safety precaution.

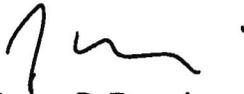
Randy Shaner
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Page 3

The Permittee also requested that it be authorized to remove the former Continued Use Vat on the return and fill dock. NMED hereby approves this request. Once this removal is complete, the Permittee must submit a letter to the NMED describing the action taken, including a revised Subpart BB drawing, equipment master list, and inspections forms that reflect the changes made.

A clean copy of the modified pages, forms and drawings are attached. These must be incorporated into the facility Permit and the Operating Record.

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

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
D. Strasser, NMED HWB
L. King, EPA Region 6 (6PD-N)
File: SKAL 2011 and Reading
HWB-SKAL-10-002

ATTACHMENT 4 SECURITY PLAN

4.1 INTRODUCTION

The following information has been provided to the New Mexico Environment Department by Safety-Kleen Systems Inc., (Facility), in accordance with the requirements of the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(4)).

The Permittee shall ensure security throughout the Facility pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.14) and Permit Condition 2.7.

The facility is secured with chain link fence topped by three strands of barbed wire inside a coil of barbed wire that is, when the barbed wire is included, a minimum of six-foot high. 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 have sensors that turn on the high intensity lights 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.

All visitors shall be required to sign a visitors log prior to movement in or around the Facility. Each visitor will be issued a visitor's badge that must be worn while the visitor is on site. The employee guide is responsible for ensuring that all visitors comply with these requirements.

4.2 FACILITY SECURITY

The underground storage tanks are inaccessible in that material cannot be added to or removed from the tanks without activating the pumps. The pumps are not activated unless solvent product or waste is being added to or removed by Safety-Kleen personnel. The controls for the pumps are outside of the return and fill station.

The three container storage units shall be 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.

1ATTACHMENT 4 SECURITY PLAN

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The Permittee shall ensure security throughout the Facility pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.14) and Permit Condition 2.7.

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 that is, when the barbed wire is included, a minimum of six-foot high. 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~~ have sensors that activate-turn on the high intensity lights 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.

All visitors shall be required to sign a visitors log prior to movement in or around the Facility. Each visitor will be issued a visitor's badge that must be worn while the visitor is on site. The employee guide is responsible for ensuring that all visitors comply with these requirements.

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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 5 INSPECTION PLAN AND SCHEDULE

5.1 INTRODUCTION

The RCRA inspection program is designed to assure protection of human health and the environment. This is accomplished by the routine examination of permitted units, equipment, and containment structures which, in the event of malfunction or deterioration which is not corrected within a timely manner, could jeopardize the health of persons or affect the environment at the Facility. Inspections are based upon a schedule, which identifies potential or actual non-compliance status of a unit, equipment, or containment structure in a manner that allows the owner/operator adequate time to repair or correct the deficiency found by the inspection.

This Attachment provides information on Safety-Kleen Systems Inc., (Safety-Kleen) Albuquerque, New Mexico Service Center (Facility), as required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(5)) requiring 20.4.1.500 NMAC (incorporating 40 CFR 264.15), and Permit Condition 2.8.

Safety-Kleen personnel shall conduct regular inspections of all equipment and structures to prevent, detect, or respond to environmental or human health hazards. Inspection records shall be kept at the Safety-Kleen Systems Inc., Albuquerque, New Mexico Service Center administration building for 3 years from the date of the inspection as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.15(d)). The inspections shall cover malfunctions, deteriorations, operator errors, and discharges that may cause or lead to a release of hazardous waste constituents to the environment or may pose a threat to human health.

Facility personnel shall receive general training concerning hazardous waste inspections as part of Safety-Kleen's hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the facility shall receive on-the-job training in inspection procedures. Inspection procedures shall be kept in an operations manual and records of inspections shall be kept in the operating record pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b)(5)), which shall be located on-site in the office of the Branch Manager.

The Service Center Manager (i.e., Branch Manager) or designate is responsible for carrying out and documenting the facility inspection. The inspections are performed each operating day. The inspector shall note any repairs that are needed and assure that they are completed. If the repairs cannot be implemented by

onsite personnel, the Service Center Manager will obtain assistance from outside the branch. Completion of repairs must also be documented on the inspection form.

Safety-Kleen employees shall make inspections of the facility each operating day to detect any unauthorized entry to the Facility or any other abnormalities. The employees shall not rely upon inspection checklist entries to make the emergency coordinator aware of spills or other emergencies, but shall provide immediate verbal notification.

Operating day is defined as any business day when branch employees are handling or managing waste at the facility, including Saturdays, Sundays and holidays.

5.2 INSPECTION SCHEDULE AND CHECKLIST

Permit Attachment 5-1 contains applicable inspection forms that shall be used at the Facility. These inspection sheets include records for the daily 12,000-gallon spent solvent underground storage tank inspection, daily Container Storage Unit (CSU) inspections for the East CSU, West CSU, and the Flammable Storage Building, ensuring that inspections occur at appropriate frequencies. The items to be inspected shall be placed on the schedule that is appropriate for the frequency of inspection to be performed. There is a section on each form for recording the name of the inspector, the date of the inspection, the nature of repairs performed and/or remedial action taken, with comments. The schedules shall be maintained and kept at the Facility.

5.2.1 Tank Inspections

The tank holding the waste solvent shall be inspected each operating day. The inspections shall 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. The solvent must not exceed 95% of the tank volume at any time. The tank is also inspected to comply with 40 CFR 264 Subpart CC requirements. Vapor pressure summary and Subpart CC compliance information is located in Attachment 5-2.

A liquid sensing leak detector is between the two walls (secondary containment) of the tank and the recorder chart must be checked each operating day as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.195(b)(2)). Any leaks detected which may indicate damage to the secondary containment must be noted and repairs initiated.

5.2.2 Reserved

5.2.3 Container Storage Units

The East Container Storage Unit, West Container Storage Unit, and Flammable Storage Building (CSUs) shall be inspected every operating day and the volume and material condition of the containers shall be recorded. The total volume of waste in each CSU shall not exceed its permitted volume. The contents of any leaking or suspect containers, which could include over-packing the leaking container, shall be placed in a container of adequate integrity. All containers shall be properly labeled and marked in accordance with U.S. DOT and the New Mexico Hazardous Waste Regulations. The secondary containment systems of the CSUs shall be inspected for deterioration or failure. If cracks or leaks are detected during the inspection they shall be repaired immediately. Containers in the CSUs shall also be inspected for 40 CFR 264 Subpart CC compliance.

5.2.4 Reserved

5.2.5 Drum Washer/Dumpsters

The two wet dumpsters/drum washers (in the return and fill station) shall be inspected every operating day for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster.

5.2.6 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. The list of Emergency equipment is located in Attachment 6, *Preparedness and Prevention*.

5.2.7 Security

The operation of each gate and lock must be checked each operating day. The Facility perimeter fence shall be checked weekly for deterioration.

**ATTACHMENT 5-1
INSPECTION FORMS**

Note: The types of waste/product stored in the Container Storage Area may be hand written or typed on the inspection form and these may be changed without requiring a permit modification from or notification to NMED.

ATTACHMENT 5-2
VAPOR PRESSURE SUMMARY AND SUBPART CC COMPLIANCE

ATTACHMENT 5-3
SUBPART BB EQUIPMENT INVENTORY AND INSPECTION PLAN

ATTACHMENT 5

INSPECTION PLAN AND SCHEDULE

5.1 INTRODUCTION

The RCRA inspection program is designed to assure protection of human health and the environment. This is accomplished by the routine examination of permitted units, equipment, and containment structures which, in the event of malfunction or deterioration which is not corrected within a timely manner, could jeopardize the health of persons or affect the environment at the Facility. Inspections are based upon a schedule, which identifies potential or actual non-compliance status of a unit, equipment, or containment structure in a manner that allows the owner/operator adequate time to repair or correct the deficiency found by the inspection.

This Attachment provides information on Safety-Kleen Systems Inc., (Safety-Kleen) Albuquerque, New Mexico Service Center (Facility), as required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(5)) requiring 20.4.1.500 NMAC (incorporating 40 CFR 264.15), and Permit Condition 2.8.

Safety-Kleen personnel shall conduct regular inspections of all equipment and structures to prevent, detect, or respond to environmental or human health hazards. Inspection records shall be kept at the Safety-Kleen Systems Inc., Albuquerque, New Mexico Service Center administration building for 3 years from the date of the inspection as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.15(d)). The inspections shall cover malfunctions, deteriorations, operator errors, and discharges that may cause or lead to a release of hazardous waste constituents to the environment or may pose a threat to human health.

Facility personnel shall receive general training concerning hazardous waste inspections as part of Safety-Kleen's hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the facility shall receive on-the-job training in inspection procedures. Inspection procedures shall be kept in an operations manual and records of inspections shall be kept in the operating record pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b)(5)), which shall be located on-site in the office of the Branch Manager.

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 5-1.~~ The inspections are performed each operating day. The Branch Manager/inspector shall note any repairs that are needed and

assure that they are completed. If the repairs cannot be implemented by onsite personnel, the ~~Technical Services Center Manager will obtain Department at Safety-Kleen's corporate headquarters must be notified for assistance from outside the branch.~~ Completion of repairs must also be documented on the inspection form ~~and noted in the Facility Operating Record.~~

Safety-Kleen employees shall make inspections of the facility each operating day to detect any unauthorized entry to the Facility or any other abnormalities. The employees shall not rely upon inspection checklist entries to make the emergency coordinator aware of spills or other emergencies, but shall provide immediate verbal notification.

Operating day is defined as any business day when branch employees are handling or managing waste at the facility, including Saturdays, Sundays and holidays.

~~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.~~

5.2 INSPECTION SCHEDULE AND CHECKLIST

Permit Attachment 5-1 contains applicable inspection forms that shall be used at the Facility. These inspection sheets include records for the daily ~~and weekly~~ 12,000-gallon spent solvent underground storage tank inspection, daily Container Storage Unit (CSU) inspections for the East CSU, West CSU, and the Flammable Storage Building, ~~Facility inspection sheets, and the leak detection and repair record,~~ ensuring that inspections occur at appropriate frequencies. The items to be inspected shall be placed on the schedule that is appropriate for the frequency of inspection to be performed. There is a section on each form for recording the name of the inspector, the date of the inspection, the nature of repairs performed and/or remedial action taken, with comments. The schedules shall be maintained and kept at the Facility.

5.2.1 Tank Inspections

The tanks holding the ~~solvent product and used waste~~ solvent shall be inspected each operating day. The inspections shall 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~~ is also inspected to comply with 40 CFR 264 Subpart CC requirements. ~~Vapor pressure summary and Subpart CC compliance information is located in Attachment 5-2.~~

A liquid sensing leak detector is between the two walls (secondary containment) of the tanks and the recorder chart must be checked each operating day as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.195(b)(2)). Any leaks detected which may indicate damage to the secondary containment must be noted and repairs initiated.

5.2.2 ~~Solvent Dispensing Equipment~~ Reserved

~~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 40 CFR 264 Subpart BB requirements. An equipment inventory for Subpart BB compliance is located in Attachment 5-3.~~

5.2.3 ~~Container Storage Units~~

The East Container Storage Unit, West, Container Storage Unit, and Flammable Storage Building (CSUs) shall be inspected ~~on a daily basis~~ every operating day and the ~~number~~ volume and material condition of the containers shall be ~~notated~~ recorded. The total volume of waste in ~~each the~~ CSUs shall not exceed ~~ten times the amount that can be collected in the CSU secondary containment system~~ its permitted volume. The contents of any leaking or suspect containers, ~~which could include over-packing the leaking container~~, shall be placed in a container of adequate integrity.

All containers shall be properly labeled and marked in accordance with U.S. DOT and the New Mexico Hazardous Waste Regulations. The secondary containment systems of the CSUs shall be inspected for deterioration or failure. If cracks or leaks are detected during the inspection they shall be repaired immediately. Containers in the CSUs shall also be inspected for 40 CFR 264 Subpart CC compliance.

5.2.4 ~~Route Vehicles~~ Reserved

~~Each route vehicle must be inspected daily 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. Any missing safety equipment shall be replaced immediately.~~

5.2.5 Drum Washer/Dumpsters

The two wet dumpsters/drum washers (in the return and fill station) shall be inspected ~~weekly~~ every operating day for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster.

5.2.6 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. The list of Emergency equipment information is located in Attachment 6, *Preparedness and Prevention*.

5.2.7 Security

The operation of each ~~outside light, gate, and lock~~ must be checked each operating day. The Facility perimeter fence shall be checked weekly for deterioration. ~~In addition, the fence must be inspected for deterioration on a weekly basis.~~

**ATTACHMENT 5-1
INSPECTION FORMS**

Note: The types of waste/product stored in the Container Storage Area may be hand written or typed on the inspection form and these may be changed without requiring a permit modification from or notification to NMED.

ATTACHMENT 5-2
VAPOR PRESSURE SUMMARY AND SUBPART CC COMPLIANCE

New Mexico Environment Department
September 2003 (modified February 2011)

Safety-Kleen Systems, Inc. Albuquerque, NM, Service Center
Facility Operating Permit
RCRA Permit No. NMD000804294

ATTACHMENT 5-3

SUBPART BB EQUIPMENT INVENTORY FOR AND INSPECTIONSINSPECTION PLAN

ATTACHMENT 6 PREPAREDNESS AND PREVENTION

6.1 INTRODUCTION

This section provides preparedness and prevention information on Safety-Kleen Systems Inc., (Safety-Kleen) Albuquerque, New Mexico Service Center (Facility), as required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(6)) requiring 20.4.1.500 NMAC (incorporating 40 CFR 264 Subpart C), and Permit Condition 2.12.

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.

Safety-Kleen employees shall perform their duties in the safest, most efficient manner possible. The Albuquerque Service Center is 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.

6.2 PREVENTATIVE MEASURES

The Safety-Kleen Systems Inc., Albuquerque, New Mexico Service Center (Safety-Kleen) shall be operated using a variety of procedures and equipment that minimize the potential for various hazards. The number one priority at Safety-Kleen is the protection of the employees and the environment.

6.2.1 Prevention of Hazards During Unloading

Unloading hazards shall be reduced through procedures, structural features and equipment used at the CSUs.

Containers of product or waste shall be moved using a handcart or placed on pallets, and moved with a forklift or pallet jack. Upon off-loading hazardous waste solvent containers from the route trucks at the Facility, which shall be done no later than the next operating day following arrival at the Facility, containers of hazardous waste solvent shall immediately be added to the storage tank or placed in the CSU. Open containers of solvent shall not be left unattended.

Safety-Kleen shall maintain handcarts and safety-rated forklifts specifically designed for hazardous waste container carrying. Containers shall not be lifted more than a few inches above the

bed of a trailer before the forklift can back away and lower the containers to a few inches above the floor of the loading dock.

6.2.2 Prevention of Flooding and Run-Off from Waste Handling Areas

The CSUs are roofed and bermed to prevent run-on. Containment in these areas is sufficient to contain spills. 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.

6.2.3 Prevention of Water Supply Contamination

All the measures discussed in the section above should help to decrease the chance of contamination of water supply. All waste handling shall be performed over concrete and any spills or leaks that do occur shall be cleaned up immediately.

6.2.4 Mitigation of Effects of Equipment Failures and/or Power Outage

Power outages and equipment failures do not create problems in the CSUs for the following reasons:

1. Shouting would be the most effective means of warning employees to evacuate since the intercom will not work during a power outage.
2. Emergency exit signs shall be self-illuminating and visible without electric power.

6.2.5 Prevention of Undue Exposure of Personnel to Hazardous Waste

Training is the key to the prevention of employee exposure. All personnel at the Facility shall be trained in procedures for properly performing CSU and tank transferring operations including handling hazardous wastes and responding to emergency situations. Included in the training shall be instruction in the use and care of personal protective equipment and the location and use of safety showers and eyewash units which are located at strategic points throughout the Facility.

All employees shall be provided with protective equipment, which includes, but is not limited to, hard hats, eye protection, steel-toed boots, respirators, protective overalls and chemically resistant aprons. Employees and visitors shall be required to wear eye protection in the warehouses, on the docks and in the

yard at all times. Hard hats shall be worn in the warehouses when transferring containerized wastes.

When transferring wastes or cleaning up hazardous waste spills is required, the worker(s) shall wear the appropriate personal protective equipment.

6.2.6 Prevention of Releases to the Atmosphere

In addition to the precautions taken at the CSUs to prevent releases, Safety-Kleen shall implement preventive procedures before the waste is transported to the CSUs. Before loading the containers of waste at a generator's facility, the containers shall be checked for soundness, proper closure, proper labeling, and compliance with U.S. Department of Transportation (DOT) standards. Any damaged containers that might leak or burst during transporting or unloading shall not be accepted for transportation.

6.3 PRECAUTIONS FOR PREVENTION OF ACCIDENTAL IGNITION OR REACTION OF IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

All ignitable or flammable containerized materials are stored in the Flammable Storage Building located in the east area of the Facility. The Facility has a combination of building design and procedural measures to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes. The first precaution taken shall be to ensure that the hazardous waste received is what is described on the generator's profile and the manifest accompanying the waste so that it can be stored properly. The procedures to accomplish this are described in the *Waste Analysis Plan*, Permit Attachment 3.

Containerized waste materials shall be stored only in closed DOT approved containers. These containers shall not be opened unless sampling or repackaging is necessary. Opening of containers shall be strictly prohibited in the storage areas.

The storage areas for the containers are inside the East and West Container Storage Areas, and the Flammable Storage building, thus allowing protection of the waste from extreme heat, cold, and sunlight.

In order to decrease hazards caused by storing incompatible wastes, any incompatible wastes shall be segregated within the CSUs. The CSUs have secondary containment areas designed to contain any material within that area should a spill or leak occur. Routine inspections of containers and container storage areas shall be conducted to allow site personnel to detect a

spill or leak quickly and to identify potential problems before they occur.

All storage containers holding hazardous waste that is incompatible with other wastes and materials shall be separated and protected from these wastes and materials by barriers placed within the CSUs.

Sources of ignition shall be eliminated by several means. First, containers of flammable and combustible materials shall be stored in the Flammable Storage Building away from electrical equipment. The Flammable Storage Building is constructed with special explosion proof wiring and is equipped with a fire suppression system, away from electrical equipment; and second, electrical outlets shall not be located in the areas where these wastes are stored.

Smoking and use of matches or lighters shall only be permitted in designated areas, which are separate from any waste management areas. "NO SMOKING" signs shall be posted at all entrances to the CSUs and in the vicinity of the return and fill station, handling areas, and other prominent places throughout the Facility. Welding, cutting and other high temperature operations shall not be allowed near the vicinity of the waste storage and handling areas unless proper precautions and planning are done and the work is approved by Safety-Kleen.

6.3.1 Required Aisle Space

The Facility operators shall maintain sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the Facility operation in an emergency.

The CSUs shall meet these requirements. The arrangement of containers in the staging area shall always be configured to meet aisle space requirements and to ensure that the forklifts, personnel, fire protection equipment, spill control equipment, and decontamination equipment can safely access the hazardous waste containers.

6.4 TRAFFIC PATTERNS

The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station. This area is paved with asphalt and concrete. The traffic plan is located in Attachment 6-1.

The entrance to the Facility is on Girard Boulevard, which is the major access route 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 van that travels the routes daily between the Service Center and Safety-Kleen's customers uses the two lane approach driveway.

6.5 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. Attachments 6-2 and 6-3 contain drawings of the waste management facility.

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 20.4.1.300 NMAC (incorporating 40 CFR 262.34(b)) or as 90-day generator storage.

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 to alert employees when the tank is approximately 600-gallons (95%) from being full.

The container storage areas in the warehouse are used to store containers of hazardous waste whose shipping papers are terminated at the facility. These may include (1) used immersion cleaner, (2) dry cleaning wastes, (3) used aqueous solvent, (4) used photochemical wastes and (5) spent solvents. Additional materials, such as non-hazardous wastes, transfer wastes (hazardous wastes whose shipping papers are not terminated at the

facility), or product may be stored as needed. The wastes are not mixed while on site and different wastes are segregated per US DOT standards according to their contents.

The wastes stored in the CSU are properly labeled to indicate their contents. Ignitable/flammable wastes are stored in the Flammable Storage Building, which is located at least 50-feet from the Safety-Kleen property boundary.

The CSUs have secondary containment. The West Storage Unit has secondary containment in the form of 6-inch wide by 4-inch high steel reinforced concrete curbs with a 1.75' x 3' x 11' (431 gallon) collection trench. The East Storage Unit has secondary containment in the form of 6-inch wide by 4-inch high steel reinforced concrete curbs with a 2' x 3' x 3' and a 2' x 1.5' x 6' (268 gallon) collection trench. The Flammable Storage Building secondary containment is provided by coated floors that slope to three collection trenches. The three 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.

Containers of hazardous waste whose shipping papers terminate at the facility shall meet DOT requirements and shall have a maximum capacity of 55-gallons (except for 85-gallon over-pack drums). Example specifications for containers used at the Service Center are shown in Permit Attachment 6-2. 55-gallon containers in the CSU shall be placed on pallets and stored no more than three pallets high. If stored three pallets high, the containers on all three pallets will be tied together.

6.6 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:

6.6.1 Pouring of Drummed Solvent into the Drum Washer/Dumpster

Employee training emphasizes the importance of taking care in emptying the drums. As the contents of the containers are poured into the drum washer/dumpster, waste can be splashed out. The return and fill station is underlain by a concrete slab and curbing. This is designed to contain this type of spill.

6.6.2 Filling of Containers with Solvent Product

A low-pressure hose with an automatic shutoff valve, similar to those used at automotive service stations, is used to fill the

containers with parts washer solvent. Leaking fittings, a damaged hose, or carelessness could lead to spilling the solvent. Manual emergency shut-off valves are located on each hose, should the equipment not function properly. In addition employee training emphasizes the importance of inspection, maintenance, and reporting of conditions with pollutant incident potential.

6.6.3 Moving of Containers

When a container is moved, the potential exists for the container to tip over. To minimize the potential for spillage of waste, containers shall 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 trenches. If material is spilled other containers are situated on pallets, therefore they will not be in contact with the spilled material.

6.6.4 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.

6.7 POTENTIAL MAJOR SPILL SOURCE

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

6.7.1 Overfilling of Storage Tanks

Both product and spent solvent tanks can be overfilled with a resulting discharge of material. A high level alarm and daily checks of tank volumes will prevent this type of incident.

6.7.2 Leaking Pipelines

The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

6.8 POTENTIAL FIRE SOURCES

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

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.

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

6.8.1 All Wastes and Products 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.

6.8.2 Handling Ignitable Wastes

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 or other wastes are stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or subject to violent reactions. The tanks are vented and the containers are stored at room temperature to minimize the potential for pressure build up.
2. The vapor pressure of Safety-Kleen solvents is low (2mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at the Service Center, 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.

4. The parts washer solvents or other containerized wastes will not cause deterioration of the tank, containers, or other structural components of the facility.

6.8.3 Adequate Aisle Space

Aisle space shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

6.9 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 professional engineer before the system is returned to use as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.196(f)).

Attachment 5, the Inspection Plan, contains procedures to inspect each valve, flange, and pump in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264 Subpart BB).

Tank construction diagrams and the certification report are located in Attachment 6-3.

6.10 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 CSUs are in buildings which are accessible only to authorized personnel.

The external factors are listed as follows:

1. Vandalism - only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan;
2. Strikes - A strike would not result in a solvent spill or fire;
3. 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 be deactivated);

4. Flooding - The site elevation is above the projected 100-year flood plain, therefore a 100-year flood will not affect the Facility;
5. Storms or Cold Weather - The solvent return and fill station and CSUs are roofed to eliminate the possibility of rain or snow entering the areas. No precipitation event is anticipated that will affect the Facility.

6.11 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. 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 in Part 1 of this Permit, and Permit Attachment 7, *Contingency Plan*.

1ATTACHMENT 6 PREPAREDNESS AND PREVENTION

6.1 INTRODUCTION

This section provides preparedness and prevention information on Safety-Kleen Systems Inc., (Safety-Kleen) Albuquerque, New Mexico Service Center (Facility), as required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(6)) requiring 20.4.1.500 NMAC (incorporating 40 CFR 264 Subpart C), and Permit Condition 2.12.

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.

Safety-Kleen employees shall perform their duties in the safest, most efficient manner possible. The Albuquerque Service Center is 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.

6.2 PREVENTATIVE MEASURES

The Safety-Kleen Systems Inc., Albuquerque, New Mexico Service Center (Safety-Kleen) shall be operated using a variety of procedures and equipment that minimize the potential for various hazards. The number one priority at Safety-Kleen is the protection of the employees and the environment.

6.2.1 Prevention of Hazards During Unloading

Unloading hazards shall be reduced through procedures, structural features and equipment used at the CSUs.

Containers of product or waste shall be moved using a handcart or placed on pallets, and moved with a forklift or pallet jack. Upon arrival-off-loading hazardous waste solvent containers from the route trucks at the Facility, which shall be done no later than the next operating day following the arrival at the Facility, containers of spent-hazardous waste solvent shall immediately be added to the storage tank of-or placed in the CSU. Open containers of solvent shall not be left unattended.

Safety-Kleen shall maintain hand-truckshandcarts and safety-rated forklifts specifically designed for hazardous waste container carrying. Containers shall not be lifted more than a few inches

above the bed of a trailer before the forklift can back away and lower the containers to a few inches above the floor of the loading dock.

6.2.2 Prevention of Flooding and Run-Off from Waste Handling Areas

The CSUs are roofed and bermed to prevent run-on. Containment ~~is~~ in these areas is sufficient to contain spills. 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.

6.2.3 Prevention of Water Supply Contamination

All the measures discussed in the section above should help to decrease the chance of contamination of water supply. All waste handling shall be performed over concrete and any spills or leaks that do occur shall be cleaned up immediately.

6.2.4 Mitigation of Effects of Equipment Failures and/or Power Outage

Power outages and equipment failures do not create problems in the CSUs for the following reasons:

1. Shouting would be the most effective means of warning employees to evacuate since the intercom will not work during a power outage.
2. Emergency exit signs shall be self-illuminating and visible without electric power.

6.2.5 Prevention of Undue Exposure of Personnel to Hazardous Waste

Training is the key to the prevention of employee exposure. All personnel at the Facility shall be trained in procedures for properly performing CSU and tank transferring operations including handling hazardous wastes and responding to emergency situations. Included in the training shall be instruction in the use and care of personal protective equipment and the location and use of safety showers and eyewash units which are located at strategic points throughout the Facility.

All employees shall be provided with protective equipment, which includes, but is not limited to, hard hats, eye protection, steeled-toed boots, respirators, protective overalls and chemically resistant aprons. Employees and visitors shall be required to wear eye protection in the warehouses, on the docks

and in the yard at all times. Hard hats shall be worn in the warehouses when transferring containerized wastes.

When transferring wastes or cleaning up hazardous waste spills is required, the worker(s) shall wear the appropriate personal protective equipment.

6.2.6 Prevention of Releases to the Atmosphere

In addition to the precautions taken at the CSUs to prevent releases, Safety-Kleen shall implement preventive procedures before the waste is transported to the CSUs. Before loading the containers of waste at a generator's facility, the containers shall be checked for soundness, proper closure, proper labeling, and compliance with U.S. Department of Transportation (DOT) standards. Any damaged containers that might leak or burst during transporting or unloading shall not be accepted for transportation.

6.3 PRECAUTIONS FOR PREVENTION OF ACCIDENTAL IGNITION OR REACTION OF IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

All ignitable or flammable containerized materials are stored in the Flammable Storage Building located in the east area of the Facility. The Facility has a combination of building design and procedural measures to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes. The first precaution taken shall be to ensure that the hazardous waste received is what is described on the generator's profile and the manifest accompanying the waste so that it can be stored properly. The procedures to accomplish this are described in the *Waste Analysis Plan*, Permit Attachment 3.

Containerized waste materials shall be stored only in closed DOT approved containers. These containers shall not be opened unless sampling or repackaging is necessary. Opening of containers shall be strictly prohibited in the storage areas.

The storage areas for the containers are inside the East and West Container Storage Areas, and the Flammable Storage building, thus allowing protection of the waste from extreme heat, cold, and sunlight.

In order to decrease hazards caused by storing incompatible wastes, any incompatible wastes shall be segregated within the CSUs. The CSUs have secondary containment areas designed to contain any material within that area should a spill or leak occur. Routine inspections of containers and container storage areas shall be conducted to allow site personnel to detect a

spill or leak quickly and to identify potential problems before they occur.

All storage containers holding hazardous waste that is incompatible with other wastes and materials shall be separated and protected from these wastes and materials by barriers placed within the CSUs.

Sources of ignition shall be eliminated by several means. First, containers of flammable and combustible materials shall be stored in the Flammable Storage Building away from electrical equipment. The Flammable Storage Building is constructed with special explosion proof wiring and is equipped with a fire suppression system, away from electrical equipment; and second, electrical outlets shall not be located in the areas where these wastes are stored.

Smoking, and use of matches or lighters shall only be permitted in designated areas, which are separate from any waste management areas. "NO SMOKING" signs shall be posted at all entrances to the CSUs and in the vicinity of the return and fill station, handling areas, and other prominent places throughout the Facility. Welding, cutting and other high temperature operations shall not be allowed near the vicinity of the waste storage and handling areas unless proper precautions and planning are done and the work is approved by Safety-Kleen.

6.3.1 Required Aisle Space

The Facility operators shall maintain sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the Facility operation in an emergency.

The CSUs shall meet these requirements. The arrangement of containers in the staging area shall always be configured to meet aisle space requirements and to ensure that the forklifts, personnel, fire protection equipment, spill control equipment, and decontamination equipment can safely access the hazardous waste containers.

6.4 TRAFFIC PATTERNS

The majority of the vehicular traffic, and loading/unloading operations occur at and near the return and fill station. This area is paved with asphalt and concrete. The traffic plan is located in Attachment 6-1.

The entrance to the Facility is on Girard Boulevard, which is the major access route 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 van that travels the routes daily between the Service Center and Safety-Kleen's customers, uses the two lane approach driveway.

6.5 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. Attachments 6-2 and 6-3 contain drawings of the waste management facility.

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 20.4.1.300 NMAC (incorporating 40 CFR 262.34(b)) or as 90-day generator storage. ~~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 to alert employees when the tank is approximately 600-gallons (95%) from being full.

The container storage areas in the warehouse are used to store containers of hazardous waste whose shipping papers are terminated at the facility. ~~These, which~~ may include (1) used immersion cleaner, (2) dry cleaning wastes, ~~and~~ (3) used aqueous solvent, ~~and~~ (4) used photochemical wastes and (5) spent solvents. Additional materials, such as non-hazardous wastes,

transfer wastes (hazardous wastes whose shipping papers are not terminated at the facility), or product may be stored as needed.

The wastes are not mixed while on site and different wastes are segregated per US DOT standards 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.~~

~~Non-hazardous material, wastes that are not regulated (including transfer wastes), and Safety-Kleen products may also be stored in the CSUs. The wastes stored in the CSU are not handled on site, and are segregated in properly labeled containers to indicate their contents. Incompatible wastes or materials shall not be stored in the CSUs.~~ Ignitable/flammable wastes are stored in the Flammable Storage Building, which is located at least 50-feet from the Safety-Kleen property boundary.

The CSUs have secondary containment. The West Storage Unit has secondary containment in the form of 6-inch wide by 4-inch high steel reinforced concrete curbs with a 1.75' x 3' x 11' (431 gallon) collection trench. The East Storage Unit has secondary containment in the form of 6-inch wide by 4-inch high steel reinforced concrete curbs with a 2' x 3' x 3' and a 2' x 1.5' x 6' (268 gallon) collection trench. The Flammable Storage Building secondary containment is provided by coated floors that slope to three collection trenches. The three 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. ~~Safety-Kleen shall not store more than 16,640 gallons of waste in the CSUs at any one time.~~

Containers ~~used for the storage~~ of hazardous waste whose shipping papers terminate at the facility shall meet DOT requirements and shall have a maximum capacity of 55-gallons (except for 85-gallon over-pack drums). Example specifications for containers used at the Service Center are shown in Permit ~~Section 3.3~~ Attachment 6-2. 55-gallon containers ~~in the CSU shall be placed on pallets and stored no more than two-three pallets high. If stored three pallets high, the containers on the top all three pallets will be tied together. 9-gallon containers shall be stacked no more than 10 high. The 9-gallon containers (black, blue, or otherwise) are described as 3H1/Y1.2/60/97 USA/AA1170 4.1. (+AA1170). Containers used may be manufactured in years other than 1997. The containers are approximately 26.5-inches x 13.5-inches x 6-inches (l x w x h). The containers have a liquid capacity of approximately 9-gallons each and are typically used to hold 5-gallons of material. Both petroleum based and water based solvents may be held in the containers.~~

~~An example of the configuration for the storage of containers is shown in Permit Attachment 1-3.~~

6.6 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:

6.6.1 Pouring of Drummed Solvent into the Drum Washer/Dumpster

Employee training emphasizes the importance of taking care in emptying the drums. As the contents of the containers are poured into the drum washer/dumpster, waste can be splashed out. The return and fill station is underlain by a concrete slab and curbing. This is designed to contain this type of spill.

6.6.2 Filling of Containers with Solvent Product

A low-pressure hose with an automatic shutoff valve, similar to those used at automotive service stations, is used to fill the containers with parts washer solvent. Leaking fittings, a damaged hose, or carelessness could lead to spilling the solvent. Manual emergency shut-off valves are located on each hose, should the equipment not function properly. In addition employee training emphasizes the importance of inspection, maintenance, and reporting of conditions with pollutant incident potential.

6.6.3 Moving of Containers

When a container is moved, the potential exists for the container to tip over. To minimize the potential for spillage of waste, containers shall 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 trenches. If material is spilled other containers are situated on pallets, therefore they will not be in contact with the spilled material.

6.6.4 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.

6.7 POTENTIAL MAJOR SPILL SOURCE

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

6.7.1 Overfilling of Storage Tanks

Both product and spent solvent tanks can be overfilled with a resulting discharge of material. A high level alarm and daily checks of tank volumes will prevent this type of incident.

6.7.2 Leaking Pipelines

The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

6.8 POTENTIAL FIRE SOURCES

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

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.

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

6.8.1 All Wastes and Products 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.

6.8.2 Handling Ignitable Wastes

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 or other wastes are stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or subject to violent reactions. The tanks are vented and the containers are stored at room temperature to minimize the potential for pressure build up.
2. The vapor pressure of Safety-Kleen solvents is low (2mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at the Service Center, 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.
4. The parts washer solvents or other containerized wastes will not cause deterioration of the tank, containers, or other structural components of the facility.

6.8.3 Adequate Aisle Space

Aisle space shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

6.9 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 professional engineer before the system is returned to use as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.196(f)).

~~Attachment 5, the Inspection Plan, contains procedures to inspect each valve, flange, and pump associated with the 12,000-gallon underground storage tanks and their ancillary equipment shall be marked and listed on the respective air monitoring inventory form. A site drawing located in Attachment 5-3 shows the~~

~~locations and numbers of the equipment. Compliance with in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264 Subpart BB) shall be achieved through facility inspections each operating day, and if required, leak detection monitoring and repair shall be conducted. Records of equipment monitoring and repair are maintained on the inspection form, located in the Facility Operating Record. If a potential leak is discovered, by any means, it shall be noted on the inspection form, repaired immediately, or as soon as possible, and not used again until all requirements of 20.4.1.500 NMAC (incorporating 40 CFR 264.196) are satisfied. The leak detection and repair record shall be kept in a file at the Facility.~~

Tank construction diagrams and the certification report are located in Attachment 6-3.

6.10 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 CSUs are in buildings which are accessible only to authorized personnel.

The external factors are listed as follows:

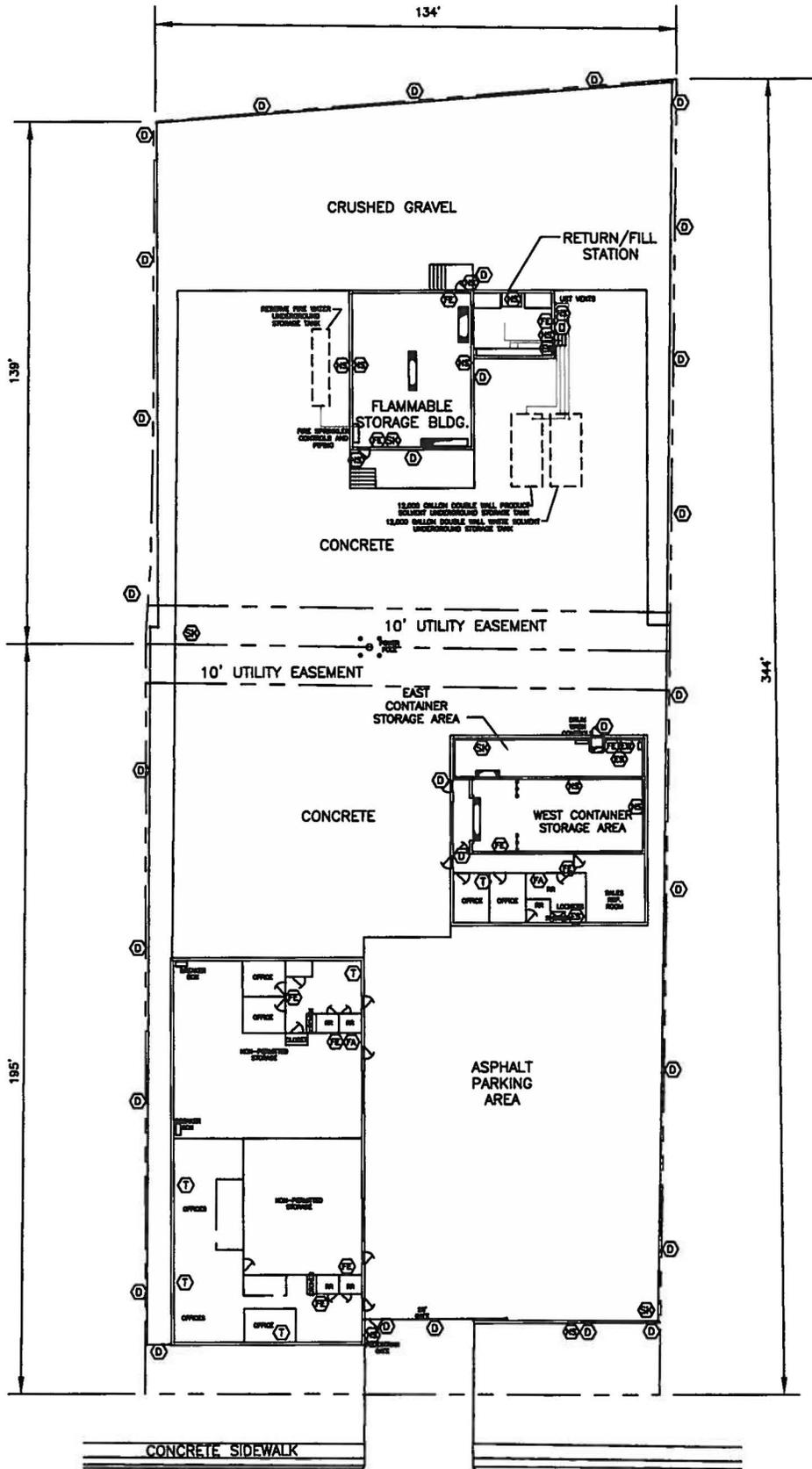
1. Vandalism - only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan;
2. Strikes - A strike would not result in a solvent spill or fire;
3. Power failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease (i.e. pumps will be deactivated);
4. Flooding - The site elevation is above the projected 100-year flood plain, therefore a 100-year flood will not affect the Facility;
5. Storms or Cold Weather - The solvent return and fill station and CSUs are roofed to eliminate the possibility of rain or snow entering the areas. No precipitation event is anticipated that will affect the Facility.

6.11 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 in Part 1 of this Permit, and Permit Attachment 7, *Contingency Plan*.

A Trihydro Corporation representative conducted a field inspection to verify construction, equipment, components, dimensions and existing conditions on June 26, 2001. Items inaccessible to visual observation were not field verified during inspection. Notes have been added to document results and/or observed modifications (as appropriate) during the June 26, 2001 inspection.

AMAFCA NORTH DIVERSION CHANNEL



EMERGENCY EQUIPMENT

- (T) - TELEPHONE
- (FE) - FIRE EXTINGUISHER
- (FA) - FIRST AID STATION
- (D) - "DANGER" SIGN SYMBOLS ARE A REPRESENTATION OF THE SIGNS "DANGER KEEP OUT" SIGNS PLACED AT ENTRY GATES AND AT A MAXIMUM INTERVAL OF 50' ALONG THE PERIMETER FENCE
- (NS) - "NO SMOKING" SIGN
- (EWS) - EYE WASH STATION
- (ES) - EMERGENCY SHOWER
- (SK) - SPILL KIT



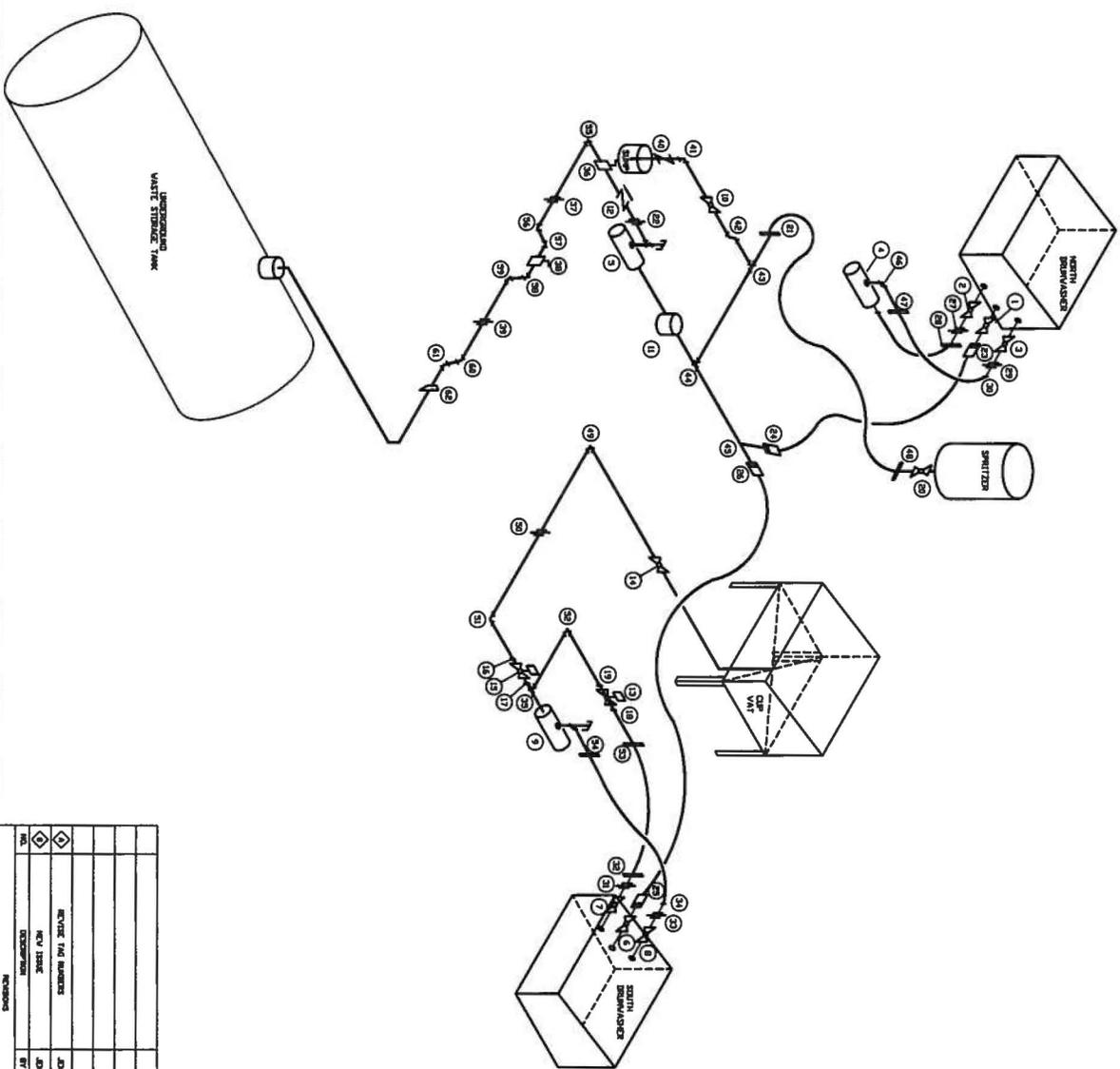
REVISIONS	
Date	By
4/18/10	JDK



**FIGURE F-1
EMERGENCY EQUIPMENT
LOCATION PLAN
2720 GIRARD NE,
ALBUQUERQUE, N.M.**

SAFETY-KLEEN SYSTEMS, INC.
1221 Girard Street, Suite 203, Colorado, South Carolina, 29201
Phone (252) 833-4200

- 1. Valve - North From 11 to the Receiver section
- 2. Valve - North From 11 to the Receiver section
- 3. Valve - North From 11 to the Receiver section
- 4. Pump - North From 11 to the Receiver section
- 5. Valve - North From 11 to the Receiver section
- 6. Valve - North From 11 to the Receiver section
- 7. Valve - North From 11 to the Receiver section
- 8. Valve - North From 11 to the Receiver section
- 9. Valve - North From 11 to the Receiver section
- 10. Valve - North From 11 to the Receiver section
- 11. Valve - North From 11 to the Receiver section
- 12. Valve - North From 11 to the Receiver section
- 13. Valve - North From 11 to the Receiver section
- 14. Valve - North From 11 to the Receiver section
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- 17. Valve - North From 11 to the Receiver section
- 18. Valve - North From 11 to the Receiver section
- 19. Valve - North From 11 to the Receiver section
- 20. Valve - North From 11 to the Receiver section
- 21. Valve - North From 11 to the Receiver section
- 22. Valve - North From 11 to the Receiver section
- 23. Valve - North From 11 to the Receiver section
- 24. Valve - North From 11 to the Receiver section
- 25. Valve - North From 11 to the Receiver section
- 26. Valve - North From 11 to the Receiver section
- 27. Valve - North From 11 to the Receiver section
- 28. Valve - North From 11 to the Receiver section
- 29. Valve - North From 11 to the Receiver section
- 30. Valve - North From 11 to the Receiver section
- 31. Valve - North From 11 to the Receiver section
- 32. Valve - North From 11 to the Receiver section
- 33. Valve - North From 11 to the Receiver section
- 34. Valve - North From 11 to the Receiver section
- 35. Valve - North From 11 to the Receiver section
- 36. Valve - North From 11 to the Receiver section
- 37. Valve - North From 11 to the Receiver section
- 38. Valve - North From 11 to the Receiver section
- 39. Valve - North From 11 to the Receiver section
- 40. Valve - North From 11 to the Receiver section
- 41. Valve - North From 11 to the Receiver section
- 42. Valve - North From 11 to the Receiver section
- 43. Valve - North From 11 to the Receiver section
- 44. Valve - North From 11 to the Receiver section
- 45. Valve - North From 11 to the Receiver section
- 46. Valve - North From 11 to the Receiver section
- 47. Valve - North From 11 to the Receiver section
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- 57. Valve - North From 11 to the Receiver section
- 58. Valve - North From 11 to the Receiver section
- 59. Valve - North From 11 to the Receiver section
- 60. Valve - North From 11 to the Receiver section
- 61. Valve - North From 11 to the Receiver section
- 62. Valve - North From 11 to the Receiver section



NO.	REVISION	DATE	BY	CHK	APP	DATE
1	REVISED	01/15/00	JDK	RE	RE	01/15/00
2	REVISED	01/15/00	JDK	RE	RE	01/15/00
3	REVISED	01/15/00	JDK	RE	RE	01/15/00
4	REVISED	01/15/00	JDK	RE	RE	01/15/00
5	REVISED	01/15/00	JDK	RE	RE	01/15/00
6	REVISED	01/15/00	JDK	RE	RE	01/15/00
7	REVISED	01/15/00	JDK	RE	RE	01/15/00
8	REVISED	01/15/00	JDK	RE	RE	01/15/00
9	REVISED	01/15/00	JDK	RE	RE	01/15/00
10	REVISED	01/15/00	JDK	RE	RE	01/15/00

SAVITT-KIRBY SYSTEMS, INC.
 2000 West Broadway, Suite 200 - Orlando, FL 32803
 Phone: (407) 443-7900 Fax: (407) 443-7901
SUBPART BB EQUIPMENT NUMBERING PLAN
 SCALE: 1" = 10'-0" DATE: 01/15/00
 DRAWN BY: JDK CHECKED BY: RE
 DESIGNED BY: JDK APPROVED BY: RE
 SERVICE CENTER LOCATION: ORLANDO, FL
 PROJECT NO.: 7133-8000-281
 SHEET NO.: A

Proprietary Statement
 THIS DRAWING IS THE EXCLUSIVE PROPERTY OF SAVITT-KIRBY SYSTEMS, INC. AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF SAVITT-KIRBY SYSTEMS, INC. ANY UNAUTHORIZED USE OF THIS DRAWING SHALL BE AT THE USER'S SOLE RISK AND WITHOUT LIABILITY TO SAVITT-KIRBY SYSTEMS, INC.

GENERAL NOTES	
1.	FIELD CORRECTIONS AS INDICATED FIELD
SYMBOL LIST	
	CHECK COUPLING
	90° CHECK COUPLING
	GATE VALVE
	EMERGENCY VALVE
	BALL VALVE
	CHECK VALVE
	STRAINER
	PUMP
	REDUCER/REDUCER
	FLANGED UNION
	CAP
	HOSE CLAMP
	FLEXIBLE HOSE
	PIPE PENETRATION/ATTACHMENT TO EQUIPMENT
	DIRECTION OF FLOW
	FLANGED CONNECTION
	JOINT

SAFETY-KLEEN ALBUQUERQUE
INSPECTION LOG SHEET FOR:
Daily Inspection of WEST CONTAINER STORAGE UNIT

PERMITTED STORAGE VOLUME 4,310 gallons

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS _____

DATE (M/D/Y) _____

TIME: _____

	MON.	TUES.	WED.	THURS.	FRI.
--	------	-------	------	--------	------

Total Volume* of <u>IC</u> **waste:					
-------------------------------------	--	--	--	--	--

Total Volume of <u>OIL FILTERS</u> **waste:					
---	--	--	--	--	--

Total Volume of <u>10-Day Transfer</u> **waste:					
---	--	--	--	--	--

Total Volume of _____ **waste:					
--------------------------------	--	--	--	--	--

Total Volume of <u>Liquid Product</u> :					
---	--	--	--	--	--

Total Volume of _____ :					
-------------------------	--	--	--	--	--

Total Volume of _____ :					
-------------------------	--	--	--	--	--

Total Volume of _____ :					
-------------------------	--	--	--	--	--

TOTAL VOLUME (IN GALLONS)					
---------------------------	--	--	--	--	--

	A*** N	A N	A N	A N	A N
--	--------	-----	-----	-----	-----

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted.

Other: _____

Condition of Containers:	A N	A N	A N	A N	A N
--------------------------	-----	-----	-----	-----	-----

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion,

Other: _____

Stacking/Placement/Aisle Space	A N	A N	A N	A N	A N
--------------------------------	-----	-----	-----	-----	-----

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets,

other: _____

CONTAINMENT:

Curbing, Floor and Sump(s)	A N	A N	A N	A N	A N
----------------------------	-----	-----	-----	-----	-----

(Any material which spills, leaks or otherwise accumulates in the secondary containment must be completely removed within 24 hours of it being discovered.)

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant, other:

Loading/Unloading Area:	A N	A N	A N	A N	A N
-------------------------	-----	-----	-----	-----	-----

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* When calculating total volumes, assume the containers are full.

** Enter a short description of the waste (e.g., M.S., I.C., paint, 10-day Transfer, Product, etc.)

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

SAFETY-KLEEN ALBUQUERQUE

INSPECTION LOG SHEET FOR:

Daily Inspection of **EAST CONTAINER STORAGE UNIT**

PERMITTED STORAGE VOLUME: 2,680 gallons

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS: _____

DATE (D/M/Y): _____

TIME: _____

CONTAINERS	MON.	TUES.	WED.	THURS.	FRI.
Total Volume* of <u>Dry Cleaning</u> **waste:	_____	_____	_____	_____	_____
Total Volume of <u>IC</u> **waste:	_____	_____	_____	_____	_____
Total Volume of _____ **waste:	_____	_____	_____	_____	_____
Total Volume of <u>10-Day Transfer</u> **waste:	_____	_____	_____	_____	_____
Total Volume of <u>Liquid Product</u> :	_____	_____	_____	_____	_____
Total Volume of _____:	_____	_____	_____	_____	_____
Total Volume of _____:	_____	_____	_____	_____	_____
Total Volume of _____:	_____	_____	_____	_____	_____
TOTAL VOLUME (IN GALLONS)	_____	_____	_____	_____	_____
	A*** N	A N	A N	A N	A N

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted.

Other: _____

Condition of Containers: A N A N A N A N A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion,

Other: _____

Stacking/Placement/Aisle Space A N A N A N A N A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets,

other: _____

CONTAINMENT:

Curbing, Floor and Sump(s) A N A N A N A N A N

(Any material which spills, leaks or otherwise accumulates in the secondary containment must be completely removed within 24 hours of it being discovered.)

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant, other:

Loading/Unloading Area: A N A N A N A N A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* When calculating total volumes, assume the containers are full.

** Enter a short description of the waste (e.g., M.S., I.C., paint, etc.) _____

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

SAFETY-KLEEN ALBUQUERQUE
INSPECTION LOG SHEET FOR:
Daily Inspection of **FLAMMABLE CONTAINER STORAGE UNIT**

PERMITTED STORAGE VOLUME 9,650 gallons

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS: _____

DATE (M/D/Y): _____

TIME: _____

	MON.	TUES.	WED.	THURS.	FRI.
--	------	-------	------	--------	------

Total Volume* of <u>M.S.</u> **waste:					
---------------------------------------	--	--	--	--	--

Total Volume of <u>PAINT</u> **waste:					
---------------------------------------	--	--	--	--	--

Total Volume of <u>90-day</u> **waste:					
--	--	--	--	--	--

Total Volume of <u>10-day Transfer</u> **waste:					
---	--	--	--	--	--

Total Volume of <u>Product M.S.</u> :					
---------------------------------------	--	--	--	--	--

Total Volume of <u>Product Lacquer Thinner</u> :					
--	--	--	--	--	--

Total Volume of _____:					
------------------------	--	--	--	--	--

Total Volume of _____:					
------------------------	--	--	--	--	--

TOTAL VOLUME (IN GALLONS)					
----------------------------------	--	--	--	--	--

	A*** N	A N	A N	A N	A N
--	--------	-----	-----	-----	-----

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted.

Other: _____

Condition of Containers:	A N	A N	A N	A N	A N
--------------------------	-----	-----	-----	-----	-----

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion,

Other: _____

Stacking/Placement/Aisle Space	A N	A N	A N	A N	A N
--------------------------------	-----	-----	-----	-----	-----

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets,

other: _____

CONTAINMENT:

Curbing, Floor and Sump(s)	A N	A N	A N	A N	A N
----------------------------	-----	-----	-----	-----	-----

(Any material which spills, leaks or otherwise accumulates in the secondary containment must be completely removed within 24 hours of it being discovered.)

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant, other:

Loading/Unloading Area:	A N	A N	A N	A N	A N
-------------------------	-----	-----	-----	-----	-----

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* When calculating total volumes, assume the containers are full.

** Enter a short description of the waste (e.g., M.S., I.C., paint, etc.) _____

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

SAFETY-KLEEN ALBUQUERQUE
INSPECTION LOG SHEET FOR:
Daily Inspection of **HAZARDOUS WASTE TANK SYSTEM SUBPART BB**
Page 1 of 2

INSPECTOR'S NAME/ INITIALS / TITLE _____

INSPECTOR'S INITIALS: _____

DATE (D/M/Y): _____

TIME: _____

Pump, Flange, or Valve number	MON.		TUES.		WED.		THURS.		FRI.	
1 Valve – North Drum Washer to Strainer suction	A**	N	A	N	A	N	A	N	A	N
2 Valve – North Drum Washer to Recirculation Pump Suction	A	N	A	N	A	N	A	N	A	N
3 Valve – North Drum Washer from Recirculation Pump Discharge	A	N	A	N	A	N	A	N	A	N
4 Pump - North Recirculation Pump	A	N	A	N	A	N	A	N	A	N
5 Trash Pump to Dirty Tank	A	N	A	N	A	N	A	N	A	N
6 Valve – South Drum Washer to Strainer suction	A	N	A	N	A	N	A	N	A	N
7 Valve – South Drum Washer to Recirculation Pump Suction	A	N	A	N	A	N	A	N	A	N
8 Valve – South Drum Washer from Recirculation Pump Discharge	A	N	A	N	A	N	A	N	A	N
9 Pump - South Recirculation	A	N	A	N	A	N	A	N	A	N
10 Valve - Sump Shutoff	A	N	A	N	A	N	A	N	A	N
11 Strainer	A	N	A	N	A	N	A	N	A	N
12 Check Valve discharge of Trash Pump	A	N	A	N	A	N	A	N	A	N
13 Valve – Automatic between South Drum Washer & South Recirculation Pump	A	N	A	N	A	N	A	N	A	N
14 Valve – Manual shutoff to Center Vat Drain	A	N	A	N	A	N	A	N	A	N
15 Valve – Automatic between Center Vat Drain and Recirculation Pump Sump	A	N	A	N	A	N	A	N	A	N
16 Flange – Suction side of #15	A	N	A	N	A	N	A	N	A	N
17 Flange – Discharge side of #15	A	N	A	N	A	N	A	N	A	N
18 Flange – Suction side of #13	A	N	A	N	A	N	A	N	A	N
19 Flange – Discharge side of #13	A	N	A	N	A	N	A	N	A	N
20 Valve – Spritzer Drain Shutoff	A	N	A	N	A	N	A	N	A	N
21 Hose Clamp / Pipe Reducers – Spritzer Drain to Strainer Suction	A	N	A	N	A	N	A	N	A	N
22 Union – Trash Pump Discharge to Check Valve	A	N	A	N	A	N	A	N	A	N
23 Cam lock Fitting - # 1 discharge	A	N	A	N	A	N	A	N	A	N
24 Cam lock Fitting – North connection to strainer suction	A	N	A	N	A	N	A	N	A	N
25 Cam lock Fitting - # 6 discharge	A	N	A	N	A	N	A	N	A	N
26 Cam lock Fitting – South connection to strainer suction	A	N	A	N	A	N	A	N	A	N
27 Union – Suction #28	A	N	A	N	A	N	A	N	A	N
28 Hose Clamp – Suction #4	A	N	A	N	A	N	A	N	A	N
29 Union – Discharge #30	A	N	A	N	A	N	A	N	A	N
30 Hose Clamp – Discharge #4	A	N	A	N	A	N	A	N	A	N
31 Union – Suction #32	A	N	A	N	A	N	A	N	A	N
32 Hose Clamp – Discharge #7	A	N	A	N	A	N	A	N	A	N
33 Union – Discharge #34	A	N	A	N	A	N	A	N	A	N
34 Hose Clamp – Discharge #9	A	N	A	N	A	N	A	N	A	N
35 TEE – Suction to #9	A	N	A	N	A	N	A	N	A	N
36 Test Connection between #12 and #37	A	N	A	N	A	N	A	N	A	N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, other: _____

For all leaks and potential leaks, the leak Detection and Repair Record must be completed.

* Add short descriptions of unit being inspected (e.g. gate valve, dumpster flange, dumpster pump, etc.)

**A = acceptable

N = not acceptable

Draw a line through pump and valve I.D. numbers that do not apply

SAFETY-KLEEN ALBUQUERQUE
INSPECTION LOG SHEET FOR:
Daily Inspection of **HAZARDOUS WASTE TANK SYSTEM SUBPART BB**
Page 2 of 2

INSPECTOR'S INITIALS: _____

DATE (D/M/Y): _____

Pump, Flange, or Valve number	MON.		TUES.		WED.		THURS.		FRI.	
	A	N	A	N	A	N	A	N	A	N
37 Union between #s 36 & 38	A	N	A	N	A	N	A	N	A	N
38 Test Connection between #37 & 39	A	N	A	N	A	N	A	N	A	N
39 Union after #38 on discharge line to waste tank	A	N	A	N	A	N	A	N	A	N
40 Check Valve sump suction line	A	N	A	N	A	N	A	N	A	N
41 90 Deg L sump suction line	A	N	A	N	A	N	A	N	A	N
42 90 Deg L sump suction line between #10 & 43	A	N	A	N	A	N	A	N	A	N
43 'T' on sump suction line that connects spritzer line	A	N	A	N	A	N	A	N	A	N
44 'T' Suction line to Trash Pump #5	A	N	A	N	A	N	A	N	A	N
45 'Y' Suction line to Trash Pump #5	A	N	A	N	A	N	A	N	A	N
46 90 Deg L discharge of recirculation pump #4	A	N	A	N	A	N	A	N	A	N
47 Hose clamp discharge of recirculation pump #4	A	N	A	N	A	N	A	N	A	N
48 Hose clamp drain line of Spritzer	A	N	A	N	A	N	A	N	A	N
49 90 Deg L drain line of Cup Vat / Suction of recirculation pump #9	A	N	A	N	A	N	A	N	A	N
50 Union drain line of CUP Vat / Suction of recirculation pump #9	A	N	A	N	A	N	A	N	A	N
51 90 Deg L drain line of Cup Vat / Suction of recirculation pump #9	A	N	A	N	A	N	A	N	A	N
52 90 Deg L drain line of South Drum Washer / Suction of recirculation pump #9	A	N	A	N	A	N	A	N	A	N
53 Hose Clamp drain line of South Drum Washer / Suction of recirculation pump #9	A	N	A	N	A	N	A	N	A	N
54 Hose Clamp discharge of recirculation pump #9	A	N	A	N	A	N	A	N	A	N
55 90 Deg L discharge of Trash Pump #5 between #s 36 & 37	A	N	A	N	A	N	A	N	A	N
56 45 Deg fitting discharge of Trash Pump #5 between #s 37 & 57	A	N	A	N	A	N	A	N	A	N
57 45 Deg fitting discharge of Trash Pump #5 between #s 56 & 38	A	N	A	N	A	N	A	N	A	N
58 45 Deg fitting discharge of Trash Pump #5 between #s 38 & 59	A	N	A	N	A	N	A	N	A	N
59 45 Deg fitting discharge of Trash Pump #5 between #s 58 & 39	A	N	A	N	A	N	A	N	A	N
60 45 Deg fitting discharge of Trash Pump #5 between #s 39 & 61	A	N	A	N	A	N	A	N	A	N
61 45 Deg fitting discharge of Trash Pump #5 between #s 60 & 62	A	N	A	N	A	N	A	N	A	N
62 Bell Reducer - Connects #5 trash pump discharge line to double walled line to waste tanks	A	N	A	N	A	N	A	N	A	N
	A	N	A	N	A	N	A	N	A	N
	A	N	A	N	A	N	A	N	A	N
	A	N	A	N	A	N	A	N	A	N
	A	N	A	N	A	N	A	N	A	N
	A	N	A	N	A	N	A	N	A	N
	A	N	A	N	A	N	A	N	A	N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, other: _____

For all leaks and potential leaks, the leak Detection and Repair Record must be completed.

* Add short descriptions of unit being inspected (e.g. gate valve, dumpster flange, dumpster pump, etc.)

**A = acceptable

N = not acceptable

Draw a line through pump and valve I.D. numbers that do not apply

SAFETY-KLEEN ALBUQUERQUE
INSPECTION LOG SHEET FOR:
Weekly Inspection of **SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES
AND MISCELLANEOUS EQUIPMENT**

INSPECTOR'S NAME / INITIALS / TITLE _____

DATE (M/D/Y): _____ TIME: _____

SAFETY AND EMERGENCY EQUIPMENT

Fire Extinguishers: A N
If 'N', circle appropriate problem: overdue inspection, inadequately charged, inaccessible, other: _____

Eyewash and Shower: A N
If 'N', circle appropriate problem: disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, other: _____

First Aid Kit: A N
If 'N', circle appropriate problem: inadequate inventory, other: _____

Spill Cleanup Equipment: A N
If 'N', circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other: _____

Personal Protection Equipment: A N
If 'N', circle appropriate problem: inadequate supply of gloves, glasses, other: _____

Communication Devices: A N
If 'N', circle appropriate problem: inadequate supply of telephones, malfunctioning telephones, malfunctioning intercom, emergency alarm does not work, telephones are not located where needed, other: _____

SECURITY DEVICES

Gates and Locks: A N
If 'N', circle appropriate problem: sticking, corrosion, lack of warning signs, fit, other: _____

Fence: A N
If 'N', circle appropriate problem: broken ties, corrosion, holes, distortion, warning signs – faded or missing, barbed wire – missing or damaged, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* Fill in the Waste Type (e.g. Mineral Spirits) **A = Acceptable N = Not Acceptable
(IF AN ITEM IS NOT APPLICABLE ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/ NOT ACCEPTABLE' ROW)

SUBPART CC COMPLIANCE PLAN

Safety-Kleen Systems, Inc.
2720 Girard Blvd NE
Albuquerque, New Mexico
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 Characterization portion of the Permit. For those hazardous waste which are managed on a transfer basis, and which are not described in the 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. 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 transport vehicle when the wastes are removed for management at the facility.

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

Waste Tanks

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

The waste solvent UST is a fixed roof, non-pressurized, quiescent tank. All waste tanks at the facility are Level 1 tanks under Subpart CC. The tank design capacity is less than 75 cubic meters (about 19,813 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 shown in Attachment 5-2 Table 1. 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 Permit.

The UST is 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 tank.

The waste solvent UST is 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 two drum washing units at this facility are fixed roof, Level 1 tanks. These are kept closed except when adding or removing wastes, washing drums, 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 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 four categories. (1) Those hazardous waste containers that are less than 0.1 m^3 (about 26 gallons) in capacity are wholly exempt from consideration under Subpart CC. Safety-Kleen manages waste with vapor pressures greater than 0.3 kPa at 20°C (e.g. lacquer thinner / paint wastes) in containers less than 0.1 m^3 about (26 gallons). (2) Those containers of hazardous waste that are transferred through the facility, regardless of the container size and the vapor pressure of the waste, are still “in the course of transportation,” and therefore are exempt from Subpart CC. (3) Containers with capacities between 0.1 m^3 and 0.46 m^3 (about 26 and 122 gallons respectively) 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 containers. Safety-Kleen manages waste with vapor pressures greater than 0.3 kPa at 20°C (e.g. lacquer thinner / paint wastes) in containers more than 0.1 m^3 and less than 0.46 m^3 . In addition, all Safety-Kleen containers used to manage waste meet applicable U.S. DOT regulations on packaging hazardous materials for transportation. (4) Containers with capacities greater than 122 gallons that manage hazardous wastes that are not “in the course of transportation” 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.

$$(0.46 \text{ m}^3 = 121.5 \text{ gal}; 0.1 \text{ m}^3 = 26.4 \text{ gal}; 75 \text{ m}^3 = 19,812.9 \text{ gal})$$

Inspections 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 / being off-loaded 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 tank inspections shall be conducted on an annual basis.

Recordkeeping

Documentation of tank and tank cover design: See Permit.

Documentation of waste determination: See Attachment 5-2 Table 1.

Records of all visual inspection: See daily facility inspection records.

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 Permit Attachment 5-2 Table 1 and Attachment 1-1.

SAFETY-KLEEN ALBUQUERQUE
Subpart CC Visual Inspection Checklists

End of Week Container Inspection

End of Week Container Inspection – complete this checklist the last day of the service week when the facility inspection will not be conducted within 24 hours. This inspection on containers will supplement container inspections completed during facility inspections during the workweek.

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Condition of containers (Circle “A” if the condition of all containers is acceptable; circle “N” if the condition of one or more containers is not acceptable.)

A N

If “N”, circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion, other: _____.

Action taken to correct unacceptable condition: _____

Annual Visual Tank Inspection

Visual Tank Inspection - Complete this inspection once each year to satisfy the annual inspection required under Subpart CC.

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Defects Noted: _____

Action taken to correct unacceptable condition: _____

Tank Inspection difficult or unsafe: _____

**Attachment 5-2, Table 1
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
SK 105 Recycled	6614 (CA) 6617 (Non-CA)	0.4		0.053		1.0		0.133	
SK 105 Virgin	6610	0.81		0.108		1.0		0.133	
SK 150 Premium	6605 6616	0.2		0.0267		0.6		0.08	
Immersion Cleaner	699	<0.4		<0.054	-	-	-	-	-
						-	-	-	-
Heavy Duty Lacquer Thinner	6782 MSDS	75-94.7 86		10-12.6 11.5		-	-	-	-
Low V.P. Lacquer Thinner	6874	< 35		< 4.67		-	-	-	-
Bulked Waste Solvent	NA	0.57 Ave 0.96 Max		0.076 0.128		-		-	

(US) Light liquid service > 0.3 KPa @ 20⁰ C

SUBPART BB EQUIPMENT INSPECTION PLAN

Listed on the attached master list is all equipment at the facility which is subject to the requirements of 40 CFR 264, Subpart BB. The numbered equipment is also identified on the attached Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste tank system is spent mineral spirits containing one or more of the following waste codes: D001, D004-D011, D018, D019, D021-D030 and D032-D043. Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic but may contain water. The vapor pressure of the bulked spent mineral spirits at 60° F is provided in Attachment 5-2, Table 1, and is less than 0.3 kPa at 20° C and is thus defined as heavy liquid under the cited regulations.

Compliance with the standard (264.1058) will be achieved through daily facility inspections, and if required, leak repair. The facility inspection record has been updated to include a detailed daily equipment inspection. Records of equipment repair are maintained on the subpart BB tank inspection record. No monitoring is required as Safety-Kleen solvents have such a low vapor pressure that at no time will the vapor around a visible leak be at or above 10,000 ppm VOC as measured via test methods specified in the regulations. A vapor pressure of 1.015 kPa or 7.6 mm Hg is necessary to produce a reading of 10,000 ppm and to define a leak as a subpart BB leak. Safety-Kleen takes the conservative approach and fixes all potential subpart BB leaks found in the waste solvent tank system and is not required to conduct monitoring of potential leaks. This is more protective of human health and the environment than the regulations.

Leak Detection and Repair Record

After detection of a potential leak, a pump or valve must be repaired to repair the leaking item. Identification of the leak and its repair are noted on the facility inspection record for the Hazardous Waste Tank System, Subpart BB.

MASTER LIST SUBPART BB NUMBER LIST (Page 1 of 2)

HAZARDOUS WASTE – HEAVY LIQUID

INDIVIDUAL NUMBER	TYPE	SPENT SOLVENT STORAGE TANK HAZARDOUS WASTE MANAGEMENT UNIT	LOCATION
1	VALVE	North Drum Washer to Strainer suction	*
2	VALVE	North Drum Washer to Recirculation Pump Suction	*
3	VALVE	North Drum Washer from Recirculation Pump Discharge	*
4	PUMP	North Recirculation Pump	*
5	PUMP	Trash Pump to Dirty Tank	*
6	VALVE	South Drum Washer to Strainer suction	*
7	VALVE	South Drum Washer to Recirculation Pump Suction	*
8	VALVE	South Drum Washer from Recirculation Pump Discharge	*
9	PUMP	South Recirculation Pump	*
10	VALVE	Sump Shutoff	*
11	STRAINER	Strainer	*
12	VALVE	Check Valve discharge of Trash Pump	*
13	VALVE	Automatic between South Drum Washer & South Recirculation Pump	*
14	VALVE	Manual shutoff to Center Vat Drain	*
15	VALVE	Automatic between Center Vat Drain and Recirculation Pump Sump	*
16	FLANGE	Suction side of #15	*
17	FLANGE	Discharge side of #15	*
18	FLANGE	Suction side of #13	*
19	FLANGE	Discharge side of #13	*
20	VALVE	Spritzer Drain Shutoff	*
21	HOSE CLAMP	Spritzer Drain to Strainer Suction	**
22	UNION	Trash Pump Discharge to Check Valve	*
23	CLF	# 1 discharge	*
24	CLF	North connection to strainer suction	*
25	CLF	# 6 discharge	*
26	CLF	South connection to strainer suction	*
27	UNION	Suction #28	*
28	HOSE CLAMP	Suction #4	*
29	UNION	Discharge #30	*
30	SF	Discharge Recirculation Pump #4	*
31	UNION	Suction #31	*
32	HOSE CLAMP	Suction #7	*
33	UNION	Discharge #34	*
34	SF	Discharge Recirculation Pump #9	*
35	TEE	Suction to #9	*
36	NA	Test Connection between #12 and #37	*
37	UNION	Between #s 36 & 38	*
38	NA	Test Connection between #37 & 39	*
39	UNION	After #38 Discharge from trash pump #5 to waste tank	*
40	VALVE	Check Valve sump suction line	*

* Under Return & Fill Grate

** Directly under the Spritzer

CLF = Cam Lock Fitting

SF = Screwed Fitting

SAFETY-KLEEN ALBUQUERQUE

EXAMPLE _____ INSPECTION LOG SHEET FOR:

Daily Inspection of WEST CONTAINER STORAGE AREA UNIT

(A separate log must be completed for each storage area.)

DESCRIPTION OF AREA (e.g. metal shelter, northeast corner of warehouse, etc.) _____

PERMITTED STORAGE VOLUME 4,310 gallons

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S SIGNATURE				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE (M/D/Y)				
TIME				

INSPECTOR'S INITIALS _____

DATE (M/D/Y) _____

TIME: _____

	MON.	TUES.	WED.	THURS.	FRI.
--	------	-------	------	--------	------

CONTAINERS

Total Volume* of IC

**waste: _____

Total Volume of OIL FILTERS

**waste: _____

Total Volume of 10-Day Transfer

**waste: _____

Total Volume of _____

_____ **waste: _____

Total Volume of Liquid Product : _____

Total Volume of _____ :

Total Volume of _____ :

Total Volume of _____ :

TOTAL VOLUME (IN GALLONS)

A*** N	A N	A N	A N	A N
--------	-----	-----	-----	-----

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted.

Other: _____

Condition of Containers:	A N	A N	A N	A N	A N
--------------------------	-----	-----	-----	-----	-----

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion,

Other: _____

Stacking/Placement/Aisle Space	A N	A N	A N	A N	A N
--------------------------------	-----	-----	-----	-----	-----

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets,

other: _____

CONTAINMENT:

Curbing, Floor and Sump(s)	A N	A N	A N	A N	A N
----------------------------	-----	-----	-----	-----	-----

SAFETY-KLEEN ALBUQUERQUE

INSPECTION LOG SHEET FOR:

Daily Inspection of EAST CONTAINER STORAGE UNIT

PERMITTED STORAGE VOLUME: 2,680 gallons

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS: _____

DATE (D/M/Y): _____

TIME: _____

CONTAINERS MON. TUES. WED. THURS. FRI.

Total Volume* of **Dry Cleaning** **waste: _____

Total Volume of **IC** **waste: _____

Total Volume of _____ **waste: _____

Total Volume of **10-Day Transfer** **waste: _____

Total Volume of **Liquid Product** : _____

Total Volume of _____ : _____

Total Volume of _____ : _____

Total Volume of _____ : _____

TOTAL VOLUME (IN GALLONS) _____

A***N A N A N A N A N

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted.

Other: _____

Condition of Containers: A N A N A N A N A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion,

Other: _____

Stacking/Placement/Aisle Space A N A N A N A N A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets,

other: _____

CONTAINMENT:

Curbing, Floor and Sump(s) A N A N A N A N A N

(Any material which spills, leaks or otherwise accumulates in the secondary containment must be completely removed within 24 hours of it being discovered.)

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant, other:

Loading/Unloading Area: A N A N A N A N A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE":

* When calculating total volumes, assume the containers are full.

** Enter a short description of the waste (e.g., M.S., I.C., paint, etc.)

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER "NA" AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

SAFETY-KLEEN ALBUQUERQUE
INSPECTION LOG SHEET FOR:
Daily Inspection of **FLAMMABLES CONTAINER STORAGE UNIT**

PERMITTED STORAGE VOLUME 9,650 gallons

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS: _____

DATE (M/D/Y): _____

TIME: _____

CONTAINERS	MON.	TUES.	WED.	THURS.	FRI.
Total Volume* of M.S. **waste:	_____	_____	_____	_____	_____
Total Volume of PAINT **waste:	_____	_____	_____	_____	_____
Total Volume of 90-day **waste:	_____	_____	_____	_____	_____
Total Volume of 10-day Transfer **waste:	_____	_____	_____	_____	_____
Total Volume of Product M.S. _____ :	_____	_____	_____	_____	_____
Total Volume of Product Lacquer Thinner _____ :	_____	_____	_____	_____	_____
Total Volume of _____ :	_____	_____	_____	_____	_____
Total Volume of _____ :	_____	_____	_____	_____	_____
TOTAL VOLUME (IN GALLONS)	<u>A*** N</u>	<u>A N</u>	<u>A N</u>	<u>A N</u>	<u>A N</u>

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted.

Other: _____

Condition of Containers: A N A N A N A N A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion.

Other: _____

Stacking/Placement/Aisle Space A N A N A N A N A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets.

other: _____

CONTAINMENT:

Curbing, Floor and Sump(s) A N A N A N A N A N

(Any material which spills, leaks or otherwise accumulates in the secondary containment must be completely removed within 24 hours of it being discovered.)

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant, other:

Loading/Unloading Area: A N A N A N A N A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE":

* When calculating total volumes, assume the containers are full.

** Enter a short description of the waste (e.g., M.S., I.C., paint, etc.) _____

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

EXAMPLE _____ INSPECTION LOG SHEET FOR:
Daily Inspection of **HAZARDOUS WASTE STORAGE TANK SYSTEM**

INSPECTOR'S NAME /INITIALS / -TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

_____/_____/_____
DATE (M-D-Y)

TIME

INSPECTOR'S INITIALS _____

DATE: (M/D/Y) _____

TIME: _____

STORAGE TANKS: 95% Level 11,400 gallons

(WASTE SOLVENT TANKS MUST NEVER BE ≤ MORE THAN 95% FULL!)

MON. TUES. WED. THURS. FRI.

Waste Solvent

* Tank (in./gal)

Product Solvent

Tank (in./gal.)

Tank Volume

A** N A N A N A N A N

Tank Exterior:

A** N A N A N A N A N

If 'N', circle appropriate problem: rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other: _____

High Level Alarms:

A N A N A N A N A N

If 'N', circle appropriate problem: malfunctioning "Power On" light, malfunctioning siren/strobe light, other: _____

Volume Gauges:

A N A N A N A N A N

If 'N', circle appropriate problem: disconnected, sticking, condensation, other: _____

CONTAINMENT AREA (Tank Dike)

Any material which spills, leaks or otherwise accumulates in the dike, including rainwater, must be completely removed within 24 hours

Bottoms and Walls UST LEAK DETECTION

A N A N A N A N A N

SYSTEM CHECK (weekly):

If 'N', circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots, stains, sealant is pitted, cracked, chipped, deterioration, displacement, leaks, other: _____

Rigid Piping and Supports:

A N A N A N A N A N

If 'N', circle appropriate problem: distortion, corrosion, paint failure, leaks, other: _____

RETURN AND FILL STATION:

Motors:

A N A N A N A N A N

If 'N', circle appropriate problem: overheating, other: _____

INSPECTOR'S NAME / TITLE _____

INSPECTOR'S SIGNATURE				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

MON. TUES. WED. THURS. FRI.

TRANSFER PUMPS AND HOSES

Pump Seals: A*—N A—N A—N A—N A—N

If 'N', circle appropriate problem: leaks, other: _____

Motors: A—N A—N A—N A—N A—N

If 'N', circle appropriate problem: overheating, other: _____

Fittings: A—N A—N A—N A—N A—N

If 'N', circle appropriate problem: leaks, other: _____

Valves: A—N A—N A—N A—N A—N

If 'N', circle appropriate problem: leaks, sticking, other: _____

Hose Connections and Fittings: A—N A—N A—N A—N A—N

If 'N', circle appropriate problem: cracked, loose, leaks, other: _____

Hose Body: A—N A—N A—N A—N A—N

If 'N', circle appropriate problem: crushed, loose, leaks, other: _____

RETURN AND FILL STATION:

Wet Dumpster: A—N A—N A—N A—N A—N

If 'N', circle appropriate problem: sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, other: _____

Secondary Containment: A—N A—N A—N A—N A—N

If 'N', circle appropriate problem: sediment/liquid, leaks, deterioration, distortion, excess debris, other: _____

Loading/Unloading Area: A—N A—N A—N A—N A—N

If 'N', circle appropriate problem: cracks, ponding/wet spots, deterioration, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE":

* A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

Daily Inspection of **HAZARDOUS WASTE TANK SYSTEM**

SUBPART BB

INSPECTOR'S NAME/ INITIALS / TITLE _____

INSPECTOR'S INITIALS: _____

DATE (D/M/Y): _____

TIME: _____

Pump, Flange, or Valve number	MON.		TUES.		WED.		THURS.		FRI.	
1 Valve – North Drum Washer to Strainer suction	A**	N	A	N	A	N	A	N	A	N
2 Valve – North Drum Washer to Recirculation Pump Suction	A	N	A	N	A	N	A	N	A	N
3 Valve – North Drum Washer from Recirculation Pump Discharge	A	N	A	N	A	N	A	N	A	N
4 Pump - North Recirculation Pump	A	N	A	N	A	N	A	N	A	N
5 Trash Pump to Dirty Tank	A	N	A	N	A	N	A	N	A	N
6 Valve – South Drum Washer to Strainer suction	A	N	A	N	A	N	A	N	A	N
7 Valve – South Drum Washer to Recirculation Pump Suction	A	N	A	N	A	N	A	N	A	N
8 Valve – South Drum Washer from Recirculation Pump Discharge	A	N	A	N	A	N	A	N	A	N
9 Pump - South Recirculation	A	N	A	N	A	N	A	N	A	N
10 Valve - Sump Shutoff	A	N	A	N	A	N	A	N	A	N
11 Strainer	A	N	A	N	A	N	A	N	A	N
12 Check Valve discharge of Trash Pump	A	N	A	N	A	N	A	N	A	N
13 Valve – Automatic between South Drum Washer & South Recirculation Pump	A	N	A	N	A	N	A	N	A	N
14 Valve – Manual shutoff to Center Vat Drain	A	N	A	N	A	N	A	N	A	N
15 Valve – Automatic between Center Vat Drain and Recirculation Pump Sump	A	N	A	N	A	N	A	N	A	N
16 Flange – Suction side of #15	A	N	A	N	A	N	A	N	A	N
17 Flange – Discharge side of #15	A	N	A	N	A	N	A	N	A	N
18 Flange – Suction side of #13	A	N	A	N	A	N	A	N	A	N
19 Flange – Discharge side of #13	A	N	A	N	A	N	A	N	A	N
20 Valve – Spritzer Drain Shutoff	A	N	A	N	A	N	A	N	A	N
21 Hose Clamp / Pipe Reducers – Spritzer Drain to Strainer Suction	A	N	A	N	A	N	A	N	A	N
22 Union – Trash Pump Discharge to Check Valve	A	N	A	N	A	N	A	N	A	N
23 Cam lock Fitting - # 1 discharge	A	N	A	N	A	N	A	N	A	N
24 Cam lock Fitting – North connection to strainer suction	A	N	A	N	A	N	A	N	A	N
25 Cam lock Fitting - # 6 discharge	A	N	A	N	A	N	A	N	A	N
26 Cam lock Fitting – South connection to strainer suction	A	N	A	N	A	N	A	N	A	N
27 Union – Suction #28	A	N	A	N	A	N	A	N	A	N
28 Hose Clamp – Suction #4	A	N	A	N	A	N	A	N	A	N
29 Union – Discharge #30	A	N	A	N	A	N	A	N	A	N
30 Hose Clamp – Discharge #4	A	N	A	N	A	N	A	N	A	N
31 Union – Suction #32	A	N	A	N	A	N	A	N	A	N
32 Hose Clamp – Discharge #7	A	N	A	N	A	N	A	N	A	N
33 Union – Discharge #34	A	N	A	N	A	N	A	N	A	N
34 Hose Clamp – Discharge #9	A	N	A	N	A	N	A	N	A	N
35 TEE – Suction to #9	A	N	A	N	A	N	A	N	A	N
36 Test Connection between #12 and #37	A	N	A	N	A	N	A	N	A	N
36 _____	A	N	A	N	A	N	A	N	A	N
37 _____	A	N	A	N	A	N	A	N	A	N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, **does not operate smoothly**, other: _____

For all leaks and potential leaks, the leak Detection and Repair Record must be completed.

* Add short descriptions of unit being inspected (e.g. gate valve, dumpster flange, dumpster pump, etc.)

**A = acceptable

N = not acceptable

_____ Draw a line through pump and valve I.D. numbers that do not apply

SAFETY-KLEEN ALBUQUERQUE

INSPECTION LOG SHEET FOR:

Daily Inspection of HAZARDOUS WASTE TANK SYSTEM SUBPART BB

Page 2 of 2

INSPECTOR'S INITIALS: _____

DATE (D/M/Y): _____

Pump, Flange, or Valve number	MON.	TUES.	WED.	THURS.	FRI.
37 Union between #s 36 & 38	A N	A N	A N	A N	A N
38 Test Connection between #37 & 39	A N	A N	A N	A N	A N
39 Union after #38 on discharge line to waste tank	A N	A N	A N	A N	A N
40 Check Valve sump suction line	A N	A N	A N	A N	A N
41 90 Deg L. sump suction line	A N	A N	A N	A N	A N
42 90 Deg L. sump suction line between #10 & 43	A N	A N	A N	A N	A N
43 "T" on sump suction line that connects spritzer line	A N	A N	A N	A N	A N
44 "T" Suction line to Trash Pump #5	A N	A N	A N	A N	A N
45 "Y" Suction line to Trash Pump #5	A N	A N	A N	A N	A N
46 90 Deg L. discharge of recirculation pump #4	A N	A N	A N	A N	A N
47 Hose clamp discharge of recirculation pump #4	A N	A N	A N	A N	A N
48 Hose clamp drain line of Spritzer	A N	A N	A N	A N	A N
49 90 Deg L. drain line of Cup Vat / Suction of recirculation pump #9	A N	A N	A N	A N	A N
50 Union drain line of CUP Vat / Suction of recirculation pump #9	A N	A N	A N	A N	A N
51 90 Deg L. drain line of Cup Vat / Suction of recirculation pump #9	A N	A N	A N	A N	A N
52 90 Deg L. drain line of South Drum Washer / Suction of recirculation pump #9	A N	A N	A N	A N	A N
53 Hose Clamp drain line of South Drum Washer / Suction of recirculation pump #9	A N	A N	A N	A N	A N
54 Hose Clamp discharge of recirculation pump #9	A N	A N	A N	A N	A N
55 90 Deg L. discharge of Trash Pump #5 between #s 36 & 37	A N	A N	A N	A N	A N
56 45 Deg fitting discharge of Trash Pump #5 between #s 37 & 57	A N	A N	A N	A N	A N
57 45 Deg fitting discharge of Trash Pump #5 between #s 56 & 38	A N	A N	A N	A N	A N
58 45 Deg fitting discharge of Trash Pump #5 between #s 38 & 59	A N	A N	A N	A N	A N
59 45 Deg fitting discharge of Trash Pump #5 between #s 58 & 39	A N	A N	A N	A N	A N
60 45 Deg fitting discharge of Trash Pump #5 between #s 39 & 61	A N	A N	A N	A N	A N
61 45 Deg fitting discharge of Trash Pump #5 between #s 60 & 62	A N	A N	A N	A N	A N
62 Bell Reducer – Connects #5 trash pump discharge line to double walled line to waste tanks	A N	A N	A N	A N	A N
	A N	A N	A N	A N	A N
	A N	A N	A N	A N	A N
	A N	A N	A N	A N	A N
	A N	A N	A N	A N	A N
	A N	A N	A N	A N	A N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, other: _____

For all leaks and potential leaks, the leak Detection and Repair Record must be completed.

* Add short descriptions of unit being inspected (e.g. gate valve, dumpster flange, dumpster pump, etc.)

**A = acceptable

N = not acceptable

Draw a line through pump and valve I.D. numbers that do not apply

SAFETY-KLEEN ALBUQUERQUE

EXAMPLE _____ INSPECTION LOG SHEET FOR:
 Weekly Inspection of **SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES
 AND MISCELLANEOUS EQUIPMENT**

INSPECTOR'S NAME / INITIALS / TITLE _____

DATE (M/D/Y): _____ TIME: _____

INSPECTOR'S SIGNATURE:				
(SIGN ON THE DAY THE INSPECTION IS PERFORMED; PERFORM INSPECTION ON THE SAME DAY EVERY WEEK.)				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

_____/_____/_____
DATE (M/D/Y)

_____/_____/_____
TIME

SAFETY AND EMERGENCY EQUIPMENT

Fire Extinguishers: A N
 If 'N', circle appropriate problem: overdue inspection, inadequately charged, inaccessible, other: _____

Eyewash and Shower: A N
 If 'N', circle appropriate problem: disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, other: _____

First Aid Kit: A N
 If 'N', circle appropriate problem: inadequate inventory, other: _____

Spill Cleanup Equipment: A N
 If 'N', circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other: _____

~~Eyewash and Shower~~ Personal Protection A N
Equipment:
 If 'N', circle appropriate problem: ~~disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking,~~ inadequate supply of gloves, glasses, other: _____

Communication Devices: A N
 If 'N', circle appropriate problem: inadequate supply of telephones, malfunctioning telephones, malfunctioning intercom, emergency alarm does not work, telephones are not located where needed, other: _____

SECURITY DEVICES

Gates and Locks: A N
 If 'N', circle appropriate problem: sticking, corrosion, lack of warning signs, fit, other: _____

Fence: A N
 If 'N', circle appropriate problem: broken ties, corrosion, holes, distortion, warning signs – faded or missing, barbed wire – missing or damaged, other: _____

MISCELLANEOUS EQUIPMENT

Dry Dumpster: A N
 If 'N', circle appropriate problem: rust, corrosion, split seams, distortion, deterioration, excess debris, liquids in unit, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* Fill in the Waste Type (e.g. Mineral Spirits)

**A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/ NOT ACCEPTABLE' ROW)

LEAK DETECTION AND REPAIR RECORD

EQUIPMENT I.D. # _____

BRANCH # _____

DESCRIPTION _____

HOW WAS THE POTENTIAL OR ACTUAL LEAK DETECTED? _____
DESCRIBE THE POTENTIAL OR ACTUAL LEAK: _____

DATE

INSPECTOR'S SIGNATURE

INSTRUMENT MONITORING WITHIN FIVE DAYS

(1.) RESULTS _____

REPAIR ATTEMPT
METHOD _____

(2.) RESULTS _____

REPAIR ATTEMPT
METHOD _____

(3.) RESULTS _____

DATE OF SUCCESSFUL REPAIR
(must be completed within 15 days)
METHOD _____

(4.) RESULTS _____

FOLLOWUP MONTHLY MONITORING FOR VALVES

(5.) RESULTS _____

(6.) RESULTS _____

MONITORING SUMMARY

(REFERENCE NUMBER SEE ABOVE)

	(1)	(2)	(3)	(4)	(5)	(6)
INSTRUMENT # / OPERATOR	_____	_____	_____	_____	_____	_____
CALIBRATION	_____	_____	_____	_____	_____	_____
BACKGROUND READING	_____	_____	_____	_____	_____	_____
READING AT EQUIPMENT	_____	_____	_____	_____	_____	_____
LEAK DETECTED?	_____	_____	_____	_____	_____	_____

ATTACH ANY DOCUMENTATION PREPARED BY THE CONSULTANT

EXAMPLE
FIGURE 4

VISUAL INSPECTION RECORDS

Facility: Safety-Kleen Corp. (City): _____

A. Visual Inspection Record

— (Frequency of Inspections Required by Permit: _____)

— Date of storm event observed: _____

— Duration of storm event observed: _____

— Potential Sources of Storm-Water Contamination Inspected
(List From Worksheet #2)

Potential Source	Inspected (Check if yes)
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Storm-Water outfalls (pipes, ditches, channels) inspected

Outfall	Inspected (Check if yes)
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Presence of floating and/or suspended material? YES NO

Presence of oil and grease? YES NO

Presence of stains or discolorations? YES NO

Presence of turbidity or odor? YES NO

Any other potential pollutants? YES NO

If yes above, describe and explain if possible. Identify each source and/or outfall where pollutants were observed: _____

Inspector's Name: _____

Date: _____

SUBPART CC COMPLIANCE PLAN

Safety-Kleen Systems, Inc.
2720 Girard Blvd NE
Albuquerque, New Mexico
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 Characterization portion of the ~~Operations Plan~~/Permit. For those hazardous waste which are managed on a transfer basis, and which are not described in the ~~Operations 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. 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~~ transport vehicle when the wastes are removed for management at the facility.

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

Waste Tanks

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

~~W~~The waste mineral spirits solvent USTs and ASTs are is a 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 75 cubic meters (about 19,813,200,000 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 shown in Attachment 5-2 Table 1 ≈ 0.2 psi. 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 ~~Operations Plan~~/Permit.

~~These~~The UST tanks are is 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~~The waste solvent UST is ~~is~~ 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 two drum washing units at this facility are fixed roof, Level 1 tanks. ~~These tanks are~~These are kept closed except when adding or removing wastes, washing drums, 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 Operations 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~~ four categories. (1) Those hazardous waste containers that are less than 0.1 m³ (about 26 gallons) in capacity are wholly exempt from consideration under Subpart CC. ~~S-K~~Safety-Kleen manages waste with vapor pressures greater than 0.3 kPa at 20° C (e.g. lacquer thinner / paint wastes) in containers less than 0.1 m³ about (26 gallons). (2) ~~Those c~~In addition, containers of hazardous waste that are transferred through the facility, regardless of the container size and the vapor pressure of the waste, are still “in the course of transportation,” and therefore are exempt from Subpart CC. (3) Containers with capacities between 0.1 m³ and 0.46 m³ (about 26 and 122 gallons respectively) 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 containers. Safety-Kleen manages waste with vapor pressures greater than 0.3 kPa at 20° C (e.g. lacquer thinner / paint wastes) in containers more than 0.1 m³ and less than 0.46 m³. 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 @ 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 @ 20° C, are managed “in the course of transportation” and are exempt from subpart CC, as described in 1) above.~~ (4) Containers with capacities greater than 122 gallons that manage hazardous wastes that are not “in the course of ~~at~~ transportation” 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.

(0.46 m³ = 121.5 gal; 0.1 m³ = 26.4 gal; 75 m³ = 19,812.9 gal)

Inspections 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 / being off-loaded 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 tank 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 ~~Attachment 5-2 Table 1 Waste Characterization 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~~ Attachment 5-2 Table 1 and Attachment 1-1.

SAFETY-KLEEN ALBUQUERQUE
Subpart CC Visual Inspection Checklists

End of Week Container Inspection

End of Week Container Inspection – complete this checklist the last day of the service week when the facility inspection will not be conducted within 24 hours. This inspection on containers will supplement container inspections completed during facility inspections during the workweek.

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Condition of containers (Circle “A” if the condition of all containers is acceptable; circle “N” if the condition of one or more containers is not acceptable.)

A N

If “N”, circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion, other: _____.

Action taken to correct unacceptable condition: _____

Annual Visual Tank Inspection

Visual Tank Inspection - Complete this inspection once each year to satisfy the annual inspection required under Subpart CC.

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Defects Noted: _____

Action taken to correct unacceptable condition: _____

Tank Inspection difficult or unsafe: _____

End of Week Container Inspection

~~End of Week Container Inspection~~—complete this checklist the last day of the service week when the facility inspection will not be conducted within 24 hours. This inspection on containers will supplement container inspections completed during facility inspections during the workweek.

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Condition of containers (Circle "A" if the condition of all containers is acceptable; circle "N" if the condition of one or more containers is not acceptable.)

_____ ~~A~~ ~~N~~

If "N", circle appropriate problem: missing or loose lids, missing or incorrect or incomplete labels, rust, leaks, distortion, other: _____.

Action taken to correct unacceptable condition:

Annual Visual Tank Inspection

Visual Tank Inspection: Complete this inspection once in January and once in July to satisfy the annual inspection required under Subpart CC.

Inspector Name: _____ Signature: _____

EXAMPLE
FIGURE 4

VISUAL INSPECTION RECORDS

Facility: Safety-Kleen Corp. (City): _____

A. Visual Inspection Record

— (Frequency of Inspections Required by Permit: _____)

— Date of storm event observed: _____

— Duration of storm event observed: _____

— Potential Sources of Storm Water Contamination Inspected
(List From Worksheet #2)

Potential Source	Inspected (Check if yes)
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Storm Water outfalls (pipes, ditches, channels) inspected

Outfall	Inspected (Check if yes)
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

- Presence of floating and/or suspended material? YES NO
- Presence of oil and grease? YES NO
- Presence of stains or discolorations? YES NO
- Presence of turbidity or odor? YES NO
- Any other potential pollutants? YES NO

If yes above, describe and explain if possible. Identify each source and/or outfall where pollutants were observed: _____

Inspector's Name: _____

Date: _____

Attachment 5-2, Table 1

**Safety-Kleen Solvents
Vapor Pressure Summary
(Isoteniscope Method)**

Product Name	Product Number	68° F (20° C)				100° F (38° C)			
		mm-Hg	psia	K Pa	atm	mm-Hg	psia	K Pa	Atm
S-K 105 Recycled	6614 (CA) 6617 (Non-CA)	<u>20.4</u>	<u>0.039</u>	<u>0.267</u> <u>0.053</u>	<u>.003</u>	<u>61.0</u>	<u>0.116</u>	<u>0.800</u> <u>0.133</u>	<u>0.008</u>
SK 105 Virgin S-K 140	<u>66466610</u>	<u><10.81</u>	<u><0.19</u>	<u><0.133</u> <u>0.108</u>	<u><0.001</u>	<u>1.01</u> <u>.5</u>	<u>0.029</u>	<u>0.133</u> <u>0.200</u>	<u>0.002</u>
S-K 150 Premium	6605 <u>6616</u>	<u>.60</u> <u>.2</u>	<u>0.012</u>	<u>0.080</u> <u>0.267</u>	<u>0.001</u>	<u>1.70</u> <u>.6</u>	<u>0.033</u>	<u>0.227</u> <u>0.08</u>	<u>0.002</u>
Immersion Cleaner	699	<u><0.41</u>	<u><0.0079</u>	<u><0.055</u> <u>0.054</u>	-	-	-	-	-
Aetrel-PC- 95	6608	<u>.02</u>	<u>0.0004</u>	<u>0.003</u>	<u>0.001</u>	-	-	-	-
Heavy Duty Lacquer Thinner	6782 <u>MSDS</u>	<u>75-94.7</u> <u>86</u>	<u>1.45-1.83</u>	<u>10-12.6</u> <u>11.5</u>	<u>0.10-0.134</u>	-	-	-	-
Low V.P. Lacquer Thinner	<u>66646874</u>	<u>24-35</u>	<u>0.46-0.68</u>	<u>3.20-4.67</u>	<u>0.03-0.05</u>	-	-	-	-
Bulked Waste Solvent	<u>NA</u>	<u>0.57 Ave</u> <u>0.96 Max</u>		<u>0.076</u> <u>0.128</u>		=		=	

(US) Light liquid service > 0.3 KPa @ 20° C

ATTACHMENT 5-3
SUBPART BB EQUIPMENT INVENTORY AND FOR INSPECTIONS PLAN

SUBPART BB EQUIPMENT INSPECTION PLAN

Listed on the attached master list is all equipment at the facility which is subject to the requirements of 40 CFR 264, Subpart BB. The numbered equipment is also identified on the attached Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste tank system is spent mineral spirits containing one or more of the following waste codes: D001, D004-D011, D018, D019, D021-D030 and D032-D043. Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic but may contain water. The vapor pressure of the bulked spent mineral spirits at 60° F is provided in Attachment 5-2, Table 1, and is less than 0.3 kPa at 20° C and is thus defined as heavy liquid under the cited regulations.

Compliance with the standard (264.1058) will be achieved through daily facility inspections, and if required, leak repair. The facility inspection record has been updated to include a detailed daily equipment inspection. Records of equipment repair are maintained on the subpart BB tank inspection record. No monitoring is required as Safety-Kleen solvents have such a low vapor pressure that at no time will the vapor around a visible leak be at or above 10,000 ppm VOC as measured via test methods specified in the regulations. A vapor pressure of 1.015 kPa or 7.6 mm Hg is necessary to produce a reading of 10,000 ppm and to define a leak as a subpart BB leak. Safety-Kleen takes the conservative approach and fixes all potential subpart BB leaks found in the waste solvent tank system and is not required to conduct monitoring of potential leaks. This is more protective of human health and the environment than the regulations.

Leak Detection and Repair Record

After detection of a potential leak, a pump or valve must be repaired to repair the leaking item. Identification of the leak and its repair are noted on the facility inspection record for the Hazardous Waste Tank System, Subpart BB.

DATE 03-01-9109-14-2010BRANCH # 7133/

Albuquerque, NM

MASTER LIST SUBPART BB NUMBER LIST (Page 1 of 2) — BRANCH # 7-008-01

PREPARER'S

HAZARDOUS WASTE – HEAVY LIQUIDSIGNATURE Dan Rockwell

INDIVIDUAL NUMBER	TYPE	SPENT SOLVENT STORAGE TANK HAZARDOUS WASTE MANAGEMENT UNIT	LOCATION
<u>145</u>	<u>VALVE UNION</u>	<u>North Drum Washer to Strainer suction DISCHARGE SIDE OF RECIRCULATING PUMP INSIDE BARREL, WASHER LEFT SIDE</u>	<u>Refer to site plan*</u>
<u>244</u>	<u>VALVE BALL VALVE</u>	<u>North Drum Washer to Recirculation Pump Suction ON/OFF DISCHARGE SIDE OF RECIRCULATING PUMP MID LEFT SIDE BARREL WASHER</u>	<u>*</u>
<u>343</u>	<u>VALVE UNION</u>	<u>North Drum Washer from Recirculation Pump Discharge DISCHARGE SIDE OF RECIRCULATING PUMP MID LEFT SIDE OF BARREL WASHER</u>	<u>*</u>
<u>442</u>	<u>PUMP UNION</u>	<u>North Recirculation Pump DISCHARGE SIDE OF RECIRCULATING PUMP LOWER LEFT SIDE OF BARREL WASHER</u>	<u>*</u>
<u>54</u>	<u>PUMP PUMP</u>	<u>Trash Pump to Dirty Tank RECIRCULATING PUMP LOWER LEFT SIDE OF BARREL WASHER</u>	<u>*</u>
<u>646</u>	<u>VALVE UNION</u>	<u>South Drum Washer to Strainer suction SUCTION SIDE RECIRCULATING PUMP LOWER LEFT SIDE OF BARREL WASHER</u>	<u>*</u>
<u>726</u>	<u>VALVE BALL VALVE</u>	<u>South Drum Washer to Recirculation Pump Suction ON/OFF SUCTION SIDE TRASH PUMP CENTER UNDER BARREL WASHER</u>	<u>*</u>
<u>85</u>	<u>VALVE PUMP</u>	<u>South Drum Washer from Recirculation Pump Discharge TRASH PUMP LOWER LEFT FRONT OF BARREL WASHER</u>	<u>*</u>
<u>914</u>	<u>PUMP FLANGE UNION</u>	<u>South Recirculation Pump DISCHARGE SIDE OF TRASH PUMP LOWER RIGHT FRONT OF BARREL WASHER</u>	<u>*</u>
<u>1015</u>	<u>VALVE FLANGE UNION</u>	<u>Sump Shutoff DISCHARGE SIDE OF TRASH PUMP LOWER RIGHT REAR OF BARREL WASHER</u>	<u>*</u>
<u>1127</u>	<u>STRAINER UNION</u>	<u>Strainer DISCHARGE SIDE OF TRASH PUMP LOWER RIGHT REAR OF BARREL WASHER</u>	<u>*</u>
<u>12</u>	<u>VALVE</u>	<u>Check Valve discharge of Trash Pump</u>	<u>*</u>
<u>13</u>	<u>VALVE</u>	<u>Automatic between South Drum Washer & South Recirculation Pump</u>	<u>*</u>
<u>14</u>	<u>VALVE</u>	<u>Manual shutoff to Center Vat Drain</u>	<u>*</u>
<u>15</u>	<u>VALVE</u>	<u>Automatic between Center Vat Drain and Recirculation Pump Sump</u>	<u>*</u>
<u>16</u>	<u>FLANGE</u>	<u>Suction side of #15</u>	<u>*</u>
<u>17</u>	<u>FLANGE</u>	<u>Discharge side of #15</u>	<u>*</u>
<u>18</u>	<u>FLANGE</u>	<u>Suction side of #13</u>	<u>*</u>
<u>19</u>	<u>FLANGE</u>	<u>Discharge side of #13</u>	<u>*</u>
<u>20</u>	<u>VALVE</u>	<u>Spritzer Drain Shutoff</u>	<u>*</u>
<u>21</u>	<u>HOSE CLAMP</u>	<u>Spritzer Drain to Strainer Suction</u>	<u>**</u>
<u>22</u>	<u>UNION</u>	<u>Trash Pump Discharge to Check Valve</u>	<u>*</u>
<u>23</u>	<u>CLF</u>	<u># 1 discharge</u>	<u>*</u>
<u>24</u>	<u>CLF</u>	<u>North connection to strainer suction</u>	<u>*</u>
<u>25</u>	<u>CLF</u>	<u># 6 discharge</u>	<u>*</u>
<u>26</u>	<u>CLF</u>	<u>South connection to strainer suction</u>	<u>*</u>
<u>27</u>	<u>UNION</u>	<u>Suction #28</u>	<u>*</u>
<u>28</u>	<u>HOSE CLAMP</u>	<u>Suction #4</u>	<u>*</u>
<u>29</u>	<u>UNION</u>	<u>Discharge #30</u>	<u>*</u>
<u>30</u>	<u>SF</u>	<u>Discharge Recirculation Pump #4</u>	<u>*</u>

<u>31</u>	<u>UNION</u>	<u>Suction #31</u>	<u>*</u>
<u>32</u>	<u>HOSE CLAMP</u>	<u>Suction #7</u>	<u>*</u>
<u>33</u>	<u>UNION</u>	<u>Discharge #34</u>	<u>*</u>
<u>34</u>	<u>SF</u>	<u>Discharge Recirculation Pump #9</u>	<u>*</u>
<u>35</u>	<u>TEE</u>	<u>Suction to #9</u>	<u>*</u>
<u>36</u>	<u>NA</u>	<u>Test Connection between #12 and #37</u>	<u>*</u>
<u>37</u>	<u>UNION</u>	<u>Between #s 36 & 38</u>	<u>*</u>
<u>38</u>	<u>NA</u>	<u>Test Connection between #37 & 39</u>	<u>*</u>
<u>39</u>	<u>UNION</u>	<u>After #38 Discharge from trash pump #5 to waste tank</u>	<u>*</u>
<u>40</u>	<u>VALVE</u>	<u>Check Valve sump suction line</u>	<u>*</u>

* Under Return & Fill Grate

** Directly under the Spritzer

CLF = Cam Lock Fitting

SF = Screwed Fitting

