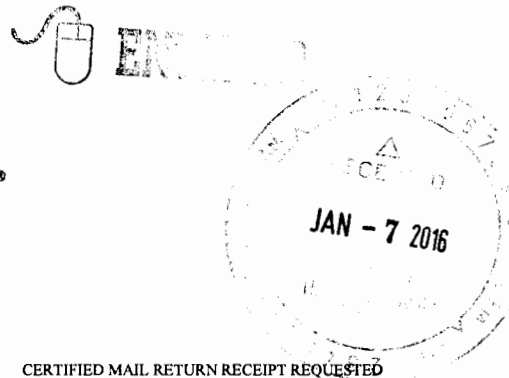


SKAL



December 14, 2015

Manager, Permits Management Program  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

RE: Waste Minimization Certification & Plan for 2015  
Albuquerque Branch  
Safety-Kleen Systems, Inc., EPA ID # NMD000804294  
2720 Girard NE, Albuquerque, NM 87107

Dear Manager:

Enclosed is the Waste Minimization Certification and Plan for 2015 as required by Part 2, Condition 2.4.3 of the facility's RCRA Part B Permit.

If you have any questions, feel free to contact me at 714-429-4355.

Sincerely,

A handwritten signature in cursive script, which appears to read "Nahid Toossi".

Nahid Toossi, C.H.M.M  
Senior Environmental, Health, and Safety Manager  
[Nahid.toossi@safety-kleen.com](mailto:Nahid.toossi@safety-kleen.com)

Enclosures : Waste Minimization Certification ; Waste Minimization Plan

cc: File 2020

# **Safety-Kleen Systems, Inc.**

## **Waste Minimization Plan**

March 1996  
Reviewed/Revised December 2015

Albuquerque, NM  
2720 Girard NE  
Albuquerque, NM 87107

EPA ID NMD000804294

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**Attachment A-1 Employee Involvement in Waste Minimization**  
Waste Minimization Suggestion Submittal Form

**Attachment A-2 Waste Minimization Certification**  
To be certified annually

**Attachment B Waste Streams Generated at the Albuquerque, NM Branch**  
Waste Type, Quantities, Current and Proposed Management Methods

**Section 1.0**  
**Facility Information**

**1.1 Facility Identification:**

Safety-Kleen Systems, Inc., Albuquerque, NM Branch

**1.2 General Information:**

Generator: Safety-Kleen Systems, Inc., Albuquerque, NM Branch

Contact Person: Nahid Toossi (714-429-4355)

Facility Phone Number: 505-884-2277

Facility Mailing Address: 2720 Girard NE  
Albuquerque, NM 87107

Site Address: Same as mailing address

Facility NAICS/SIC Code(s):

- 48422 - Specialized Freight (except Used Goods) Trucking, Local
- 48423 - Specialized Freight (except Used Goods) Trucking, Long-Distance
- 53249 - Other Commercial and Industrial Machinery and Equipment Rental and Leasing
- 56211 - Waste Collection

**1.3 Certification:**

I certify that the information contained in this form is true and correct to the best of my knowledge and belief.

Name of Environmental Health and Safety Manager: Nahid Toossi



Signature of EHS Manager

Date: 12-14-2015

## **Section 2.0**

### **What is Waste Minimization?**

Waste minimization is specifically required by the U.S. Congress in the 1984 “Hazardous and Solid Waste Amendments to the Resource and Conservation and Recovery Act (RCRA).” Waste minimization consists of source reduction and recycling. More specifically, waste minimization is the reduction of the generation and disposal of hazardous waste. It includes source reduction and recycling which results in either:

1. Reduction of the total volume or quantity of hazardous waste, or
2. Reduction of toxicity of hazardous waste.

#### **2.1 Volume (Source) Reduction**

Volume or source reduction is any activity that reduces or eliminates the generation of hazardous waste at the source. Controlling the sources of waste generation reduces the volume of waste that is produced at Safety-Kleen locations include, but are not limited to the following volume reduction activities.

**Substituting Materials** - Using materials which do not create waste, or which can be beneficially reused, recycled, or reclaimed.

Examples of Safety-Kleen's source reduction techniques are:

- Using spent mineral spirits instead of clean product for the drum washing activity.
- Using metal filters on the return and fill station equipment instead of the disposable cloth filters.

**Technology** - Changing processes, equipment, and operations to reduce the amount of waste generated.

Examples of technology changes at Safety-Kleen are:

- Eliminating the use of liner bags inside of parts washer drums thus reducing the amount of waste generated;
- Reducing the amount of spills by improving drum closure devices;
- Using a drum spritzer to polish rinse 150 solvent drums (the spritzer uses a small amount of clean solvent) that have been cleaned with spent solvent instead of using a larger amount of clean solvent that is swirled in the drum and dumped out to perform the rinse.

**Operating Practices** - Segregating waste streams, changing material handling procedures, and changing management practices.

Examples of Safety-Kleen's operating practices that result in waste reduction are:

- Reducing the amount of spills that occur by more careful material handling that is taught and emphasized with training courses.
- Reducing the amount of waste generated from the cleanup of a spill by providing secondary containment and/or paved areas where releases are more likely to occur.
- Segregating recyclable materials (i.e. sludge), burnable materials (i.e. labels, personal protective equipment), and non-burnable materials (i.e. metal pieces, glass, rocks) to reduce

the amount of waste to be disposed of as hazardous waste and/or to facilitate recovery of materials that may be recycled.

- Keeping secondary containment areas clean so that any accumulated rainwater does not become contaminated.

**Reclassification of Waste** - Wastes may be characterized based on generator's knowledge, analytical results or a combination of both. For waste streams that Safety-Kleen suspects could be hazardous, Safety-Kleen will only manage as non-hazardous if analytical results support that classification or the generator certifies in writing that they have knowledge that it is non-hazardous. Being conservative and classifying waste as hazardous, when it may not be, may unnecessarily increase the amount of hazardous waste generated.

See Section 4.0, Achieving Waste Minimization, for more information about volume reduction techniques.

## **2.2 Toxicity Reduction**

Toxicity reduction results in reduced volume and types of waste generated. In some instances, Safety-Kleen has changed a process to limit or exclude the contamination of waste with toxic components. An example of this is to segregate small amounts of wastes with listed codes from large quantities of wastes that are only characteristic wastes. Thus the toxicity of the larger hazardous waste stream is not increased in toxicity.

## **2.3 Recycling**

Recycling includes using, reusing, or reclaiming a material. Safety-Kleen provides machines that will recycle certain materials at the generator's site while other wastes are collected and sent to Safety-Kleen recycling centers to recover usable products. Additional details on recycling are provided in Section 4.0, Achieving Waste Minimization.



## **Section 3.0**

### **Safety-Kleen Systems, Inc. Overall Waste Minimization Program**

#### **3.1 Established Program**

Safety-Kleen is committed to minimizing the amount of waste generated at Safety-Kleen locations that is not related to health and safety or to managing customer waste. These two areas of waste generation are excluded because Safety-Kleen does not want to discourage the proper use of personal protective equipment and the company's business is to manage wastes generated by its customers. Safety-Kleen assists its customers in ensuring proper recycling or disposal of their wastes and while not a specific part of Safety-Kleen's site-specific waste minimization program, provides customers with technologies that can help them reduce the amount and toxicity of hazardous waste they produce.

#### **3.2 Objectives**

The objectives of the program are:

- To comply with a key element of the Safety-Kleen's Environmental Management System (EMS), i.e. regulatory and permit requirements.
- To educate Safety-Kleen personnel about waste minimization opportunities.
- Provide Safety-Kleen management with information regarding the Company's responsibility to minimize waste.

#### **3.3 Elements of Safety-Kleen Waste Minimization Program**

Safety-Kleen establishes a cost-effective waste minimization program at each of its facilities that includes the following elements:

- Management Commitment - The facility personnel understand why waste minimization is important. Management encourages employees to develop and implement ideas that will minimize hazardous waste generation. The Waste Minimization Suggestion Submittal Form included in Attachment A is provided to employees to receive input.
- Waste minimization assessment - Facility personnel evaluate ways to reduce and eliminate waste. This assessment analyzes what materials are used, what materials can be substituted, how mixing of waste can be avoided, and whether alternate technologies are available for reducing waste. Management certifies that personnel under his/her direction and supervision are undertaking specific steps in accordance with this program to minimize the amount and toxicity of hazardous wastes generated at each facility. The certification included in Attachment A is renewed annually.

#### **3.4 Phased-Approach to Waste Minimization Program**

The following summarizes Safety-Kleen's phased-approach to a Waste Minimization Program.

1. Educate employees about waste minimization (what it is and how to achieve it).

2. Train personnel to identify opportunities for waste minimization as it relates to Safety-Kleen facility operations.
3. Train personnel by communicating waste minimization alternatives as it relates to daily facility operations.
4. Provide written waste minimization information to management.

This document addresses the four phases of the Safety-Kleen program.

### 3.5 Waste Stream name and description

Typical waste streams that are routinely generated at the Safety-Kleen branches include the following.

1. Mineral spirits used for cleaning drums in the drum washer and the drum spritzer.
2. Filters used on the return and fill equipment.
3. Mineral spirits or aqueous sludge generated from cleaning the return and fill station.
4. Storage tank cleanouts.
5. Sampling equipment and personal protective equipment.
6. Used oil samples and sample jars.
7. Used oil rags, sludge, oil from drip pans and buckets, etc.
8. Scrap Metal.
9. Rags / absorbent pads used in the process of servicing customer equipment / Branch facilities
10. Labels, paperwork, and other paper / plastic items that may have become contaminated with hazardous wastes.
11. Aerosol Cans.

### 3.6 Waste Reduction Measures

Safety-Kleen considers the following waste reduction measures through out the company:

1. **Mineral spirits used for cleaning drums in the drum washer** - Safety-Kleen will continue utilizing used solvent to wash drums instead of using new product. This process will continue to provide an annual source reduction of approximately 2 million pounds.
2. **Filters used on the return and fill equipment** - Safety-Kleen will continue utilizing metal filters that can be cleaned and reused instead of using new disposal fabric filters. This process will continue to provide an annual source reduction of approximately 1000 pounds. If metal filter have to be replaced, the replaced filter may be cleaned and managed as scrap metal.
3. **Operating Practices** - Safety-Kleen will continue its operating Practices - Segregating waste streams, changing material handling procedures, and monitoring waste management practices to minimize the generation of hazardous waste. This process cannot be quantified.

4. **Mineral spirits sludge generated from cleaning of the Return and Fill station-** This waste stream is originally generated by Safety-Kleen customers. The more solvent Safety-Kleen picks up from its customers, the more sludge is generated. It is not feasible to reduce this waste stream. However, Safety-Kleen will look into options that may reduce the ratio of sludge generated per volume of solvent.
5. **Storage tank cleanouts** – Same as Item 4 above.
6. **Sampling equipment and personal protective equipment** - Same as item 4 above. However, Safety-Kleen segregates these wastes from recyclable materials (i.e. sludge), and non-burnable materials (i.e. metal pieces, glass, rocks) to increase the amount of material that can be economically recycled and potentially reduce the toxicity of the larger quantity waste streams.
7. **Used oil sample jars.** This waste is generated from the sampling of used oil generated by Safety-Kleen's customers. Reduction of this waste is not feasible.
8. **Used Oil Rags, filter sludge, etc.** These are accumulated in containers designated to be used only for these materials. Not commingling these with hazardous waste streams reduces the quantity of hazardous waste generated.
9. **Rags, paper, plastic, etc.** These wastes streams are managed in a variety of ways to minimize generation of additional amounts of hazardous waste. Some sites use shop rags that may be laundered and reused while servicing their customers. Others use absorbent wipes that are reused throughout the day and only discarded at the end of the day if they won't be serviceable for the entire next day's operations. These are placed in containers used only for these wastes and sampling equipment and PPE thus reducing the toxicity and quantity of dumpster sludge generated at a branch.

As described above, the wastes that appear on shipping documents as if they have been generated by Safety-Kleen are actually generated by customers of Safety-Kleen. These wastes are stored in tanks and/or in containers and subsequently shipped off site to other facilities. Safety-Kleen relies mostly on source reduction for on-site processes that may generate waste, such as washing the parts washer drums returning from customers, the use of re-usable metal filters rather than disposable, and segregation of more toxic wastes from less toxic wastes to reduce the toxicity of larger quantity waste streams.

## **Section 4.0 Achieving Waste Minimization**

Safety-Kleen achieves waste minimization in several ways. The following briefly discusses options that Safety-Kleen practices at its facilities.

### **4.1 Source Reduction through Good Operating Practices**

Safety-Kleen operating practices facilitate reduction of waste at the source as follows:

**Waste Segregation** - Encouraging employees to use specific waste receptacles for different wastes generated at the branch as discussed earlier. This minimizes the quantities of wastes that require special handling when generated.

**Material Handling and Inventory Practices** - Safety-Kleen management ensures that hazardous materials are properly stored to avoid spillage or damage and the resulting cleanup of waste material. Proper inventory management ensures that materials are not discarded due to age. Similarly, hazardous materials are ordered in quantities sufficient for operation. Larger quantities are not stored that could result in improper storage, exceeding of shelf life, and spills or accidents involving crowded storage areas.

**Loss Prevention** - Materials can become wastes when equipment leaks or spills occur. In addition, using too much of a material results in waste generation (for example, using too much solvent creates more waste). Safety-Kleen management reminds employees to properly maintain equipment and to avoid mishaps such as spills of solvents.

**Cost Accounting Procedures** - For Safety-Kleen facilities, cost accounting of waste disposal encourages significant waste minimization. When specific departments are held accountable for their own waste disposal cost, they are more waste conscientious. Management periodically reviews each facility's performance in waste generation and management.

**Production Schedules** - The product Distribution Centers schedule their trips to service centers to reduce the need for frequent equipment cleaning, which could result in waste generation.

### **4.2 Source Reduction through Process Modifications**

Safety-Kleen management considers the following options to reduce waste using process modifications:

- Changes in production methods
- Changes in equipment
- Changes in operating conditions, such as flow rates, temperature, pressure, residence time

### **4.3 Source Reduction through Product Changes**

Safety-Kleen considers opportunities to minimize waste by changing products. Changes include:

- Substituting products - Safety-Kleen replaced its old formula Immersion Cleaner 609 with a less toxic non-halogenated formula (Immersion Cleaner 699)
- Conserving products
- Changing the composition of the product
- Providing options to customers to use aqueous cleaners versus petroleum solvents.

#### **4.4 Waste Minimization through Material Recycling and Recovery**

##### **Recycling: Use or Reuse**

Recycling may be achieved through use or reuse of a waste material. Essentially the waste material is returned to a process to replace a certain amount of new material. The process may be the same process from which the waste came, or an entirely new process.

Examples of Safety-Kleen's recycling practices include:

- Reusing old paints in a painting process that does not require a specific color
- Using sludge as fuel.

##### **Recovery: Reclamation**

Reclamation involves recovering a valuable material from hazardous wastes and non-hazardous wastes. Generally, a reclaimed material is not used at the same facility where it was generated.

Examples of Safety-Kleen's reclamation practices are:

- Reclaiming clean parts washer solvent from dirty parts washer solvent
- Recovering silver from film processing wastewater equipment.

##### **Safety-Kleen Recycling and Recovery Services**

Safety-Kleen provides many services to its customers that can help them meet waste minimization responsibilities through recycling and recovery. Examples of Safety-Kleen's services are:

- Safety-Kleen collects spent antifreeze, waste oil, and organic solvents and distills these to remove solids and contaminants. The waste material then becomes reusable for Safety-Kleen customers.
- Safety-Kleen also fuel blends cleanup materials from hazardous waste spills and organic-based absorbent material and sludge from storage tank maintenance. Fuel blenders who operate permitted facilities mix these wastes with fuel for energy generation.

## **Section 5.0**

### **Identifying Waste Minimization Opportunities**

Safety-Kleen management encourages evaluation of the following opportunities to establish a successful waste minimization program.

#### **5.1 Understanding the Facility Processes**

Safety-Kleen management assesses where hazardous waste is generated at a facility, what kinds of wastes are generated, and analyzes the processes associated with products or services. Management then determines which kinds of waste minimization techniques are feasible.

#### **5.2 Knowing the Materials Used**

Knowing what is used in a facility process is important in determining waste minimization options. Management considers whether:

- A substitute to the material can be used.
- The material quantity can be reduced.
- Wastes can be introduced back into the process to reduce the amount of new materials used.

#### **5.3 Training Employees and Education**

Once management establishes a plan for waste minimization, employees must be trained in implementing it.

Training includes:

- Explaining that waste minimization is important because it:
  - \* Protects the health of workers
  - \* Protects the environment
  - \* Meets regulatory requirements
  - \* Saves the Company money
- Explaining the requirements of the work plan:
  - \* Who is responsible for the different parts of the plan
  - \* How facility processes will change
  - \* How the program will be monitored
- Emphasizing management commitment to waste minimization:
  - \* Checking with staff on the progress of the waste minimization program
  - \* Rewarding employees for waste minimization

## **Section 6.0**

### **Understanding the Costs/Benefits of Waste Minimization**

Safety-Kleen managers understand that waste minimization is required and that there are costs associated with waste minimization. However, there are also very significant benefits.

#### **6.1 Cost to Facilities**

The facility personnel who implement waste minimization evaluate their business and the alternatives available to them. The time spent performing this evaluation has a cost. In addition, if the facility substitutes materials or uses additional recycling services, there may be some cost associated with this.

#### **6.2 Benefits of Waste Minimization**

Waste minimization has many benefits. Safety-Kleen management emphasizes these benefits, as discussed below.

##### **Economic Benefits**

- Disposal Cost Reduction - The costs of landfilling and incinerating hazardous waste is increasing. Disposal options will become more costly and limited over time.
- Costly Alternative Treatments - Certain waste streams will become more and more difficult to treat as disposal options become limited. Alternate technology to treat waste is expensive.
- Savings in Materials Cost - When a facility practices waste minimization, it uses fewer materials. This reduces the cost of operating the business.

##### **Regulatory Benefits**

- Specific Requirements - All generators of hazardous waste are required to minimize the waste they generate. Generators must demonstrate waste minimization when they sign a waste manifest, when they submit a biennial report under RCRA, or when applying for facility permits.
- Land Ban - Since some waste is banned from land disposal, waste minimization avoids this regulatory limitation.

##### **Liability Benefits**

- Generator Liability - RCRA established cradle-to-grave liability. Therefore, Safety-Kleen is responsible for managing wastes stored at facilities, in transit, and when disposed of. Waste needs to be disposed of properly to avoid becoming a potentially responsible party for the cleanup of the contamination. Safety-Kleen must encourage employees to avoid liability by minimizing waste generation.
- Potential Worker Safety - The U.S. Environmental Protection Agency (U.S. EPA) and the Occupational Safety and Health Administration (OSHA) evaluate whether facilities are properly protecting their employees from hazardous materials and wastes found in the workplace. Safety-Kleen management minimizes potential employee exposure to hazardous waste by encouraging waste minimization.
- Public Image Benefits - Safety-Kleen's ability to operate responsibly helps the Company obtain its customers' confidence. This is especially important when Safety-Kleen

demonstrates to community members that its business is a safe and productive addition to the community.



## **Section 7.0**

### **Programs to Assist Generators in Waste Minimization (U.S. EPA)**

Safety-Kleen strives to be the leader in providing services, which are user safe and environmentally friendly in the workplace. Safety-Kleen continues to work on new technologies designed to assist generators in meeting the waste minimization goals of the U.S. EPA, as well as state-specific requirements.

#### **7.1 Premium Solvent Parts Washing Service (mid 1993)**

The purpose of the Premium Solvent program is to provide customers with a Waste Minimization Program alternative to parts cleaning customers who currently utilize hazardous materials to accomplish this task. Often customers who use the Premium Solvent may show by analytical methods that their used solvent is not a hazardous waste. Safety-Kleen has switched all many customers to Premium Solvent or Aqueous Parts Washer. Premium Solvent is the only solvent offered to customers.

#### **7.2 Aqueous Parts Washer Service**

The purpose of the Aqueous Parts Washer service is to provide an alternative to organic-based solvents for generators. Safety-Kleen provides generators with aqueous parts washer solvent options to achieve waste minimization objectives.

#### **7.3 Model 250 Parts Washer Service**

Safety-Kleen has a SK Model 250 recycling parts washer. The Model 250 is designed to provide customers another option to meet their parts cleaning needs while at the same time address concerns for reducing hazardous waste output. Model 250's provide on-site recycling of 150 Premium Gold Solvent producing used oil by-product that can be managed as used oil in most cases. The Model 250 contains a distillation unit within that will return dirty solvent back as usable product. The solvent that is returned to the reservoir maintains virtually all of its original form and cleaning capabilities.

## **Section 8.0**

### **Identifying Other Informational Sources (USEPA)**

Safety-Kleen management informs employees about other sources of waste management information.

#### **8.1 Federal Government**

The U.S. EPA Region 6 - provides guidance for the Safety-Kleen Albuquerque, NM Branch.

The U.S. EPA provides businesses with assistance in waste minimization. Safety-Kleen and its customers can call the U.S. EPA RCRA/Superfund Hotline at (800) 424-9346 or U.S. EPA Region 6.

In addition, the U.S. EPA publishes a number of guidance documents for pollution prevention (PP) and waste minimization. Safety-Kleen and its customers can obtain these guides through the U.S.EPA or the U.S. Government Printing Office (202) 783-3238.

#### **8.2 State and Local Assistance**

In addition to the federal agencies above, state and local agencies may have information. In general, Safety-Kleen and its customers can contact environmental agencies or health departments for reference to local agencies that deal with hazardous waste issues.

**Section 9.0**  
**Site-Specific Waste Minimization Program**  
**Albuquerque, NM Branch**

**9.1 Waste Minimization Program at the Safety-Kleen Albuquerque NM Branch**

Typical waste streams that are routinely generated at the Safety-Kleen Branches are included in Section 3.5 above. Safety-Kleen will continue to implement the selected waste reduction measures identified in Section 3.6. Additional waste streams will be evaluated for source reduction/waste minimization opportunities.

**9.2 Selected Measures**

Attachment B identifies quantities of branch-generated waste streams from October 1, 2011 to September 30, 2012. Current management methods and proposed management methods that are selected as waste reducing alternatives are identified as follows:

1. **Branch-contaminated debris** – The Albuquerque branch encourages employees to segregate non-hazardous wastes from the hazardous waste debris. This will result in reducing volume of hazardous waste.
2. **Dumpster mud sludge**- The Albuquerque branch continues to segregate sludge and contaminated debris. This will keep the recyclable waste (sludge) separate from the burnable material (debris) and ensures that sludge is recycled to the maximum quantity. It also reduces the volume of the branch hazardous debris which is a more toxic waste stream. The segregation also eliminates operational problems in the distillation columns.
3. **Non-hazardous water**- The Albuquerque branch only pumps contaminated water from tank farms and return and fill secondary containment into used Mineral Spirit storage tanks. This eliminates unnecessary increases in the volume of hazardous waste solvents.
4. **Universal wastes**- The Albuquerque branch ensures that universal waste streams are handled properly per state-specific regulations. This eliminates unnecessary increase in the volume of hazardous waste.
5. **Empty aerosol cans**- The Albuquerque branch follows Safety-Kleen’s aerosol can management BOG.
6. **Removal of solvents from Safety-Kleen machines at customer sites** – Safety-Kleen has trained the service representatives to empty solvents from machines to be removed out of service at customer sites. This is necessary to comply with transportation requirements of hazardous waste. In addition, this method reduces the volume of waste that would be generated at the branch.

7. **Metal** – Metal parts and pieces from cleaning dumpster screens, metal solvent filters that have to be replaced, nuts, bolts, etc., empty, punctured aerosol cans, may be sent for scrap metal recovery.

### 9.3 Measures Identified for further evaluation

The following waste streams have been identified for further evaluation.

1. **Recycling of aqueous parts washer (APW) at customer site** – Safety-Kleen could evaluate possibility of use of a portable recycling unit at customer sites for APW. This would reduce the volume of this non-recyclable material that is currently discharged subsequent to treatment.
2. **Processing Aerosol Cans for Scrap Metal** - Safety-Kleen could evaluate the economics of setting up a puncturing system to deactivate and empty aerosol cans and putting the processed aerosol cans into a scrap metal container vs. disposal as Hazardous Waste.

### 9.4 Goal

Safety-Kleen goal is to continue to minimize the volume of hazardous wastes generated (relative to production rate) at this location.

### 9.5 Annual Review

This plan will be reviewed on an annual basis to monitor effectiveness of selected measures and to identify additional potential waste stream that may be reduced.

1. No capital dollars have been expended in the last year to increase source reduction of hazardous waste in the last year. The hazardous wastes generated by the Albuquerque branch are exclusively related to the success of Safety-Kleen's business at this branch. The better the business, the more hazardous waste will be generated. However, as shown in Attachment B, 98% of the hazardous wastes generated by the branch are sent for recycling. The branch did achieve a 40% reduction in hazardous waste from 2012. The majority of the decrease in hazardous waste generation came from not having to clean out of the hazardous waste tank. This operation is not completed every year. The tank is cleaned out only when needed, this is not a waste stream that is consistently generated.
2. Safety-Kleen provides services to its customers to help them reduce the amount of hazardous waste they generate and provides services for its customers for them to recycle their hazardous wastes. Given the nature of Safety-Kleen's business, contacting other agencies for ideas on source reduction would not be fruitful.
3. Some additional potential waste minimization activities are identified in Section 9.3, however the amount of waste reduction that would be achieved by these would be miniscule.
4. Safety-Kleen has reviewed the following waste minimization techniques:
  - a. The Albuquerque Branch does not remove coatings from parts before applying new coats – thus all of the potential waste minimization techniques identified in the permit are not applicable to this location.

- b. When using solvents (spent solvent wastes) for parts cleaning operations:
  - i. The use of water-soluble cutting fluids instead of oil-based fluids. This does not apply to the Albuquerque branch processes. The solvents returned by Safety-Kleen's customers are used to wash drums. Utilizing another product would increase the amount of waste produced and not reduce it.
  - ii. The use of bead-blasting for paint-stripping. While Safety-Kleen has products to supply to customers to accomplish this activity, it is not an activity performed by Safety-Kleen and thus this is not applicable.
  - iii. The prevention of cross-contamination. Safety clean has procedures and trains its employees to be cognizant of the potential to cross-contaminate its non-hazardous wastes with hazardous wastes. Safety-Kleen has a mineral spirits solvent that has no RCRA hazardous waste properties unless contaminated by the customer during its use.
  - iv. The use of peel coatings in place of protective oils. Safety-Kleen is not a manufacturer of parts that are coated with protective oils and thus this is not applicable.
  - v. Reduce the number of different solvents. Reducing the number of solvents provided by Safety-Kleen to its customers and thus the number of spent solvents returned to the branch does not change the amount of hazardous waste produced by Safety-Kleen.

The only way Safety-Kleen could reduce the hazardous waste it generates by 50%, the milestone date of November 2001, is to lose customers and perhaps go out of business. As stated earlier, the hazardous waste generation rate at the Albuquerque branch is dependent upon the number of customers that the branch services. Having a goal to reduce its hazardous waste generation would be to have a goal to go out of business. That being said, and as has been said before, Safety-Kleen provides many potential services to its customers that will assist them to recycle and/or reduce the amount of hazardous waste they generate.

**Attachment A**  
**Employee Involvement in Waste Minimization**

The form in Example A-1 is used for employee suggestions for waste minimization at Safety-Kleen facilities. This form is signed by the employee and reviewed by his manager before being submitted to the Regional Environmental Manager. A copy of the form is filed in EHS file 2020 - Waste Minimization.

Wherever possible, the employee includes cost justification savings that would result from implementation of the idea.

Regional Environmental personnel review ideas and refer them to upper management for possible implementation.

**Attachment A-1**  
**Waste Minimization Suggestion Submittal Form**

Description of the procedure or process change suggested (attach additional pages and diagrams if needed):

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Estimated capital cost of the change:                      \$ \_\_\_\_\_

Estimated annual expenses from the change:                      \$ \_\_\_\_\_

Estimated annual savings from the change:                      \$ \_\_\_\_\_

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Manager Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Title

\_\_\_\_ / \_\_\_\_ / \_\_\_\_  
Date

\_\_\_\_ / \_\_\_\_ / \_\_\_\_  
Date


**Attachment A-2**

**Waste Minimization Certification  
(YEAR)**

Safety-Kleen Systems, Inc.  
Albuquerque, NM Branch

EPA ID No. NMD000804294

I hereby certify under penalty of law that personnel under my direction and supervision at this facility are undertaking specific steps in accordance with a program in place to minimize the amount and toxicity of hazardous wastes generated at this facility to a degree economically practicable and that the method utilized for the treatment, storage, or disposal of hazardous wastes is the practicable method currently available to this facility which minimizes the present and future threat to human health and the environment. I am aware that there are significant penalties for false certification, including the possibility of fine and imprisonment.

  
\_\_\_\_\_  
Signature

Ruben Clemens  
\_\_\_\_\_  
Name

Branch Manager  
\_\_\_\_\_  
Title

12-8-2015  
\_\_\_\_\_  
Date



**Attachment B**

**Branch-Generated Waste Streams  
(January 1 to December 7, 2015)**

**Albuquerque, NM Branch**

**Hazardous Waste Generation Matrix**

<u>LOCATION</u>	<u>DESCRIPTION OF WASTE</u>	<u>POUNDS GENERATED</u>
Return and Fill Station	Hazardous Waste Debris	4,160
	Drum Washer Sediment	445
Warehouse	Used oil retain samples	550
Total		5,155