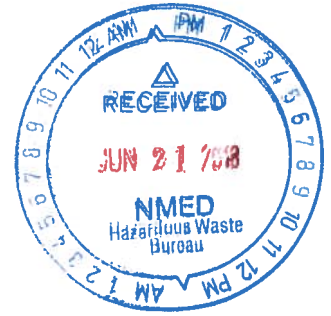




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733



JUN 15 2018

Mr. Dave Cobrain  
Manager  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

**RE: Review of the Resource Conservation and Recovery Act (RCRA) Final Permit for Safety-Kleen Systems, Inc., Albuquerque, NM (EPA ID. No. NMD000804292).**

Dear Mr. Cobrain:

We have completed our review of the final permit for the facility referenced above. Enclosed is a copy of our review checklist which includes: permit conditions; types of units; compliance schedules; financial assurance requirements; and consistency of data in RCRA Info. The purpose of this letter is to document our review process, while providing oversight for the hazardous waste permitting.

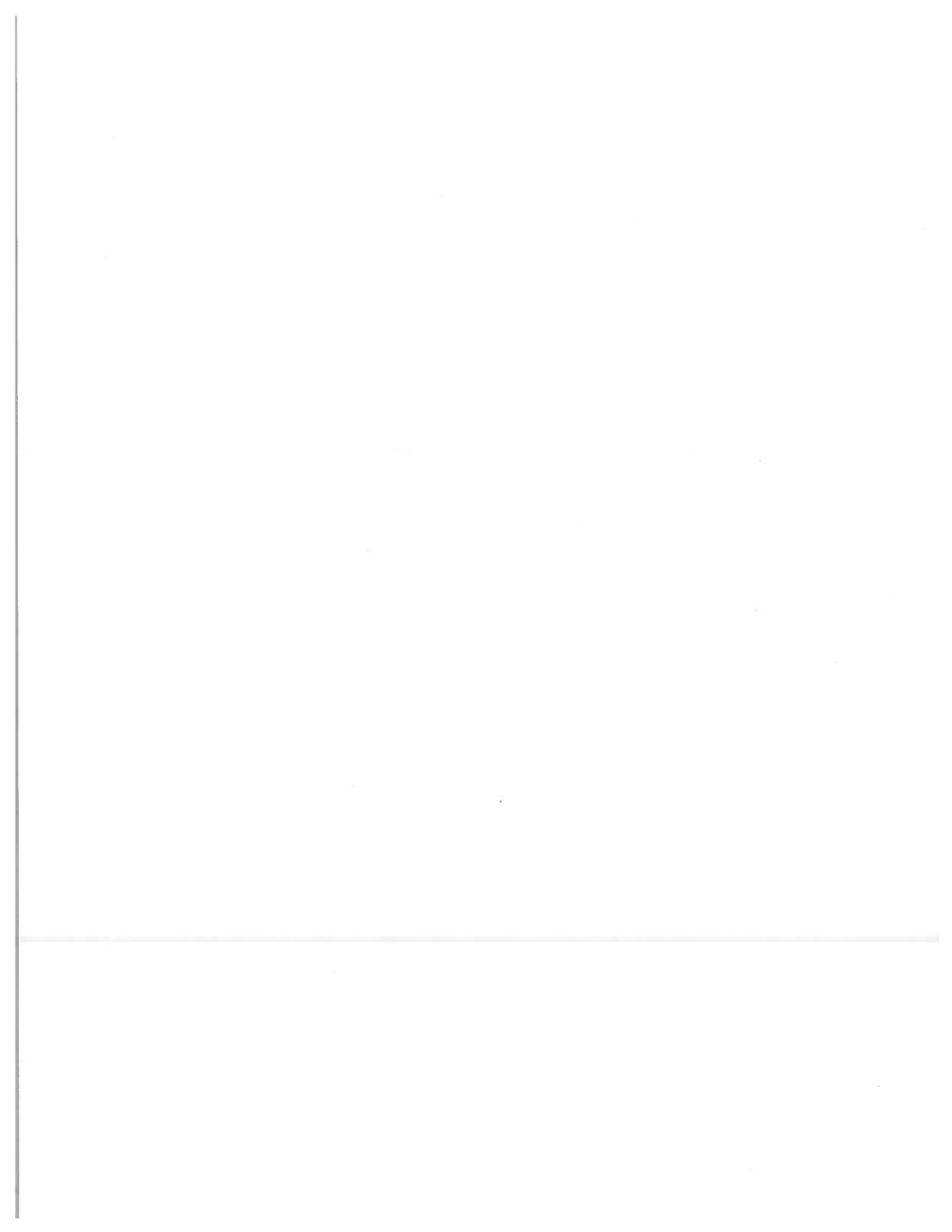
If you have any questions regarding this letter, please contact James Sales of my staff at (214) 665-6796.

Sincerely,

Kishor Fruitwala, Ph.D.  
Chief, RCRA Permits Section  
Multimedia Division

Enclosure

cc: Melissa Smith, 6MM-RS



Oversight Checklist for Operating/Post-Closure Permits

**SAFETY-KLEEN SYSTEMS, INC.**  
**ALBUQUERQUE SERVICE CENTER**  
**EPA ID. NO. NMD000804294**  
**FINAL PERMIT ISSUED 2/28/18**

Performance Standards	Comments
1. Permit conditions are consistent with the authorized state program and the intent of the regulations regarding level of control, containment, cleanup or protection.	Permit language is consistent with the authorized state program. Permit contains conditions for the protection of the environment through control of operations, engineering controls for storage and handling, and for spill-cleanup, containment, and requirements for clean closure.
2. Permit conditions are clear, understandable and enforceable.	Permit conditions are clearly divided into subject categories and permit language is understandable and enforceable.
3. Proper documentation and an administrative record are maintained.	The draft permit renewal was issued in September 2017. The Permit went to Public Notice with Administrative Record and Fact Sheet which closed in December 2017. Final permit was issued on February 28, 2018.
4. Post-closure care, monitoring and maintenance controls are provided.	Since this is a commercial storage permit, the permit anticipates clean closure of all units (Part 5), with the caveat that any unit not cleaned closed would be subject to post-closure care under 264 Subpart G. Closure must be certified by NMED through a final report with certifications.
5. Controls address: enforceability	The permit contains language in Sections 1.11 and 1.12 on the enforceability of the permit and its conditions.
6. Controls address: compliance schedules.	Permit compliance schedules are included in Sections 1.13-1.15 of the permit which gives NMED enforceable conditions to require that the permittee adhere to required compliance schedules.
7. Controls address: soil and groundwater monitoring requirements.	There are no identified CA units or AOC at this facility. RCRA info notes that a CA was completed in 2007. This facility does not treat or dispose of wastes onsite. The permit contains requirements for soil and groundwater monitoring in the event CA is required, and soil sampling is required as part of the verification of clean closure.
8. Controls address: cleanup levels in adequate detail and mechanisms for measuring achievement of post-closure and operating performance standards.	No post-closure care is required if clean closure is achieved in accordance with the permit conditions for closure. The permit includes detailed requirements for clean closure under Section 5 of the permit.
9. Controls address: review of cost estimates and financial assurance instruments to assure they accurately reflect closure and post-closure costs	Section 5.2 of the permit address the Financial Assurance requirements for operation of the facility. As of 1-24-17, SK carried closure cost insurance from Indian Harbor for 103,432.00. The closure cost estimate was 113,933.00. An update of the FA is

Oversight Checklist for Operating/Post-Closure Permits

and are sufficient to cover cost estimates. Also financial assurance for corrective action if included.	due in August 2018. No closure cost for CA was required or included.
10. Public participation requirements are met.	The PN period closed in December 2017. No comments were received. The requirements for public participation were met with proper notices and administrative record,
11. Describe the permitted units, including general information on capacity. Verify that all units described in the application are included in the permit.	The facility has two 12,000 gallon underground storage tanks that were installed in 1992 and certified as installed in accordance with RCRA UST regulations. One tank is for clean solvents, the other for used solvents. The facility also has a 2,500 s.f. warehouse with two container storage areas. A solvent fill and return dock area, a flammable materials storage building, and a general office building. The tanks and storage areas are included in the permit.
12. Describe the closed units including general information on post-closure requirements. Verify that all units described in the application are included in the permit.	There are no closed at this facility.
13. Verify RCRA Info data is up to date	Matt Loesel verified that the RCRA info system is up to date fort his facility.