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September 5, 2018

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

Re: Class 2 Permit Modification Request
Safety-Kleen Systems, Inc.
Albuquerque, NM Service Center
EPA ID# NMD000804294

Dear Mr. Cobrain:

Safety-Kleen Systems is requesting a Class 2 Modification to the facility Part B operating permit. This modification will update Section C.3.1.2 (Quantitative Analysis) of the Waste Analysis Plan (WAP), Permit Condition 2.4.4 (Waste Characterization Review) of the Part B Permit, Table D.1 (Emergency Coordinator List for the Facility) of the Part B Permit, and Permit Condition 2.2.3 (Hazardous Waste from Off-Site Sources) of the Part B Permit. Specifically, Safety-Kleen Systems requests an update the Waste Analysis Plan to incorporate Safety-Kleen's Annual Waste Recharacterization Program, monthly random sampling of infrequent customers for solvent and aqueous waste streams, and site evaluation of waste characteristics (e.g. volume differences, color and odor) observed during pickup of solvent wastes from generators. In addition, this modification will allow Safety-Kleen to store permitted waste for no more than one year in accordance with 40 CFR 268.50(b) and New Mexico NMAC 20.4.1.801. This modification also updates Permit Condition 2.13.2 (Distribution) to clarify distribution of the facility contingency plan to emergency agencies when any changes are made to the plan.

Justifications for the requested Permit Modifications are outlined as follows:

- The costs associated sampling generators for their first three waste shipments is an economic burden to waste generators and does not appear to be beneficial to either Safety-Kleen or the New Mexico Environmental Department. The incorporation of Safety-Kleen's extensive Waste Recharacterization Program along with random waste sampling provides increased generator waste identification for both the customer and NMED without increasing economic burden on the generators of the state.

- As a permitted TSDF, the facility is allowed to store waste for up to one year under 40 CFR 268.50(b) and New Mexico NMAC 20.4.1.801 as opposed to the 90 day generator requirement as written into the permit.

- The update to the distribution of contingency plan is needed because of incorrect emergency contact information listed in the original issued permit.

Please find attached proposed redline modifications to the permit conditions set forth above.

Thank you for your consideration in this matter. If you have any questions or require additional information, please contact me at 515/266-0319 or via email at mori.sorenson@safety-kleen.com

Sincerely,

Mori Sorenson
Vice President Environmental Compliance

C.3.1.2 Quantitative Analysis (Lab Analysis)

All new waste streams generated on- or off-site shall be characterized by laboratory chemical analysis, acceptable knowledge in accordance with Permit Section 2.4.3, or a combination of the of the two methods. ~~Initial characterization of waste streams from each customer shall be conducted for a minimum of the first three shipments and shall include c~~Chemical analyses shall be conducted by a qualified contract chemical analytical laboratory using the appropriate EPA SW 846 analytical methods. Chemical analyses shall, at a minimum include testing for volatile organic compounds (EPA Method 8260D, as updated), semi-volatile organic compounds (EPA method 8270C, as updated), RCRA metals (EPA Method 6010/6020, as updated), flashpoint (EPA Method 1010 or 1020) and pH (EPA Method 9045D, as updated) and any other constituent listed on the product ~~M~~SDS or that could be present as a result of the use of the product. Sampling of waste streams shall be conducted in accordance with EPA SW 846 sampling methods and EPA's RCRA Waste Sampling Guidance (EPA530-D-02-002, August 2002) appropriate for the container(s) being sampled and the analyses being performed.

~~After 50 years of servicing over 250,000 parts washer customers each year, Safety-Kleen has determined that the wastes generated by its customers are relatively homogeneous.~~ The homogeneity of ~~these~~ waste streams shall ~~is~~be evaluated annually through the Safety-Kleen Recharacterization Process (Quantitative Analysis) and through site evaluation of waste characteristics (e.g., volume differences, color, odor) observed during pickup of wastes from customers. Should the site evaluation identify significant differences in the waste stream from the anticipated waste condition, the Permittee shall require additional testing and information from the generator. Such information shall be placed in the Facility Operating Record, if the waste is accepted for pickup by Safety Kleen.

In addition to the waste characterization procedures included in this Permit, the Permittee shall submit a random sample received during each month to a chemical analytical laboratory for the analyses listed above. The random samples will be collected from customers who are infrequent generators (e.g., customers that are serviced less frequently than monthly, new customers, or will call customers). One sample each quarter shall be from a solvent-based waste stream. Samples of aqueous cleaner must be collected during each of the other two months of each quarter. The samples shall be analyzed for Total Metals (using EPA SW846 6010), Total Volatiles (using SW846 8260), flashpoint and pH. If the sample analytical results indicate the characteristic of ignitability or corrosivity or the D-listed constituents in the samples are detected at concentrations greater than the concentrations listed in 40 CFR 261.24, then the waste stream shall be deemed a hazardous waste and the customer/generator will be converted to a profiled hazardous waste and assigned the appropriate RCRA characteristic codes. The results of the analysis shall be maintained in the Facility Operating Record.

Recharacterization of Safety Kleen core waste streams ~~from each customer~~ shall be conducted a minimum of once per year or in accordance with the Safety Kleen Annual Recharacterization process and shall include chemical analyses conducted by a qualified contract chemical analytical laboratory using the appropriate EPA SW 846 analytical methods. Sampling of waste streams shall be conducted in accordance with EPA SW 846 sampling methods and EPA's RCRA Waste Sampling Guidance (EPA530-D-02-002, August 2002) appropriate for the

container(s) being sampled and the analyses being performed. Chemical analyses shall, at a minimum include testing for volatile organic compounds (EPA Method 8260D, as updated), semi- volatile organic compounds (EPA method 8270C, as updated), RCRA metals (EPA Method 6010/6020, as updated, flashpoint (EPA Method 1010 or 1020) and pH (EPA Method 9045D, as updated) and any other constituent listed on the product ~~M~~SDS or that could be present as a result of the use of the product. ~~Acceptable knowledge (AK) may be used in lieu of chemical analyses; however, AK must be verified with chemical analyses a minimum of once every three years. The generator shall provide the data to the Facility and the data provided by each customer shall be kept on file in the Facility Operating Record.~~

Hazardous wastes currently included in the re-characterization process are shown below in Table C-3.

2.2.3. Hazardous Waste from Off-site Sources

The Permittee may accept, store, or otherwise manage at the permitted units at the Facility, only the hazardous wastes from off-site sources with an available final disposal path.

The Permittee shall not store the wastes for more than one year ~~90 days~~ prior to shipping the wastes off-site.

The Permittee shall receive from off-site sources only the hazardous waste types listed in Permit Attachment B (Authorized Wastes) for storage at the Facility.

2.4.4 Waste Characterization Review

The Permittee shall ensure that the initial characterization of any hazardous waste is reviewed or repeated according to the frequency established in Permit Attachment C (Waste Analysis Plan) to verify that characterization is accurate and up-to-date, as required by 40 CFR § 264.13(b)(4). The Permittee shall also:

1. Annually review the characterization of ~~ten percent by volume of the~~ hazardous wastes per the Safety-Kleen ~~s~~ waste analysis plan and annual re-characterization process to verify that the characterization is accurate.
2. Recharacterize a hazardous waste whenever there is a change in waste-generating processes that may affect the physical or chemical properties, listed status of the waste, or the land disposal restriction status of the waste.
3. Recharacterize a hazardous waste whenever the Permittee is notified by an off-site facility that has received a hazardous waste from the Facility that the characterization of the waste received at the off-site facility does not match a pre-approved waste analysis certification or accompanying waste manifest or shipping paper.

TABLE D.1
Emergency Coordinator List for the Facility

Facility Emergency Coordinators

Primary	**Alternate**
Scott Dolk	~~Angel Chaves~~ Elizabeth Thomas
Market sales specialist	Lead ~~Material Handler~~ Secretary
2720 Girard Blvd. NE	2720 Girard Blvd. NE
Albuquerque, NM 87108	Albuquerque, NM 87107
Main (office) Phone (505) 884-2277	Main (office) Phone (505) ~~884-2277~~346-4122
Cell Phone (505) 506-6360	Cell Phone (505) 328-7243~~415-2010~~

2.13.2 Distribution

The Permittee shall maintain current copies of the Contingency Plan in the main Facility office and in the Facility Operating Record. The Permittee also shall distribute copies of the current Contingency Plan to all entities with which the Permittee has arrangements in accordance with Permit Section 2.12.6.

The Permittee shall distribute any modifications to the Contingency Plan ~~within fifteen days of the effective date of this Permit and~~ within fifteen days of the effective date of any modification of the Contingency Plan to all entities with which the Permittee has arrangements in accordance with Permit Section 2.12.6 in accordance with 40 CFR 264.53. The Permittee shall ensure that all copies of the Contingency Plan distributed outside the Facility are sent in hard copy by mail. The Permittee shall obtain a record of receipt to ensure distribution to each recipient. A record of compliance with this requirement shall be maintained in the Facility Operating Record.

The Permittee shall ensure that evacuation routes for the Facility are prominently posted at each Permitted Unit. (40 CFR 264.52(f)).