

Annual Waste Minimization Report

Safety-Kleen Systems, Inc.
Albuquerque, NM

EPA ID Number. NMD000804294

Safety-Kleen Systems, Inc. – Albuquerque's (SKAL) 2019 permit specifies:

2.5 WASTE MINIMIZATION PROGRAM

The Permittee shall implement and maintain a waste minimization program to reduce the volume and toxicity of hazardous wastes generated at the Facility (see 40 CFR § 264.73(b)(9)). The waste minimization program shall include proposed, practicable methods currently available to the Permittee to minimize the present and future threat to human health and the environment. The Waste Minimization Program shall include the following items:

1. Plan for reducing the volume and toxicity of hazardous waste at the Facility and recycling of hazardous waste at the Facility;
2. Employee training designed to identify and implement source reduction and recycling opportunities for all hazardous wastes;
3. Waste minimization and recycling implemented over the last year and additional waste minimization efforts that could be implemented at the Facility in the next federal fiscal year; and
4. Estimated costs devoted to waste minimization and recycling of hazardous waste.

The Permittee shall submit to the Department a report regarding progress made in the waste minimization program in the previous year. The report shall address items (1) - (4) above, shall show changes from the previous report, and shall be submitted annually by December 15 for the previous fiscal year ending September 30th.

SKAL implements and maintains a Waste Minimization Plan 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 waste is the practicable method currently available to this facility which minimizes the present and future threat to human health and the environment. The Plan includes:

1. Sections 3 and 4 of the Waste Minimization Plan address reducing the volume and toxicity of hazardous waste and the recycling of hazardous waste.
2. Section 5.3 of the Waste Minimization Plan addresses Employee training to identify and implement source reduction and recycling opportunities. In addition Attachment A of the Plan includes a Waste Minimization Suggestion Submittal Form to encourage employees to submit ideas to management.
3. Section 9.2 of the Waste Minimization Plan addresses minimization and recycling implemented over the last year and Section 9.3 addresses additional waste efforts that could be implemented at the facility next year.
4. Section 9.5 of the Waste Minimization Plan addresses costs associated to waste minimization and recycling of hazardous waste.

As described in the Plan, 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 which may generate waste, such as washing the parts washer drums returning from customers for reuse, 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. As a permitted storage facility rather than a manufacturer, waste generated by Safety-Kleen year over year is directly related to the volume of customer generation. See matrix below.

Hazardous Waste Generation Matrix

Location	Description of Waste	Pounds Generated 2018 (October 1, 2017 to September 30, 2018)	Pounds Generated 2019 (October 1, 2018 to September 30, 2019)
Return and Fill Station	Hazardous Waste Debris	2,398	1,874
	Drum Washer Sediment		
Warehouse	Used oil retain samples	2,150	1,667
Total		3,774	3,541



CERTIFIED MAIL RETURN RECEIPT REQUESTED

October 11, 2019

Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313

And:

New Mexico Environment Department
Hazardous Waste Bureau
121 Tijeras Avenue NE
Suite 1000
Albuquerque NM 87102

RE: Waste Minimization Report for 2019
Safety-Kleen Systems, Inc.- Albuquerque Branch
EPA ID # NMD000804294

Dear Chief:

Enclosed is the Waste Minimization Report for 2019 as required by Part 2, Condition 2.5 of the facility's RCRA Part B Permit. In addition, a copy of the report has been saved to the enclosed CD as required.

If you have any questions, feel free to contact Nick Culian or Sr. Environmental Compliance Manager at 530-363-2632, or by email at nick.culian@safety-kleen.com.

Sincerely,



Scott Dolk
Branch Manager

Enclosures : 2019 Waste Minimization Report

cc: File 2020