NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

ENTERED

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUN 0 4 2020

Scott Dolk
Branch Manager
Safety-Kleen Systems, Inc.
2720 Girard Blvd. NE
Albuquerque, NM 87108

RE: APPROVAL OF CLASS 1 PERMIT MODIFICATION (WITHOUT PRIOR APPROVAL), SAFETY-KLEEN SYSTEMS, INC., ALBUQUERQUE CENTER, NEW MEXICO
EPA ID Number NMD000804294
HWB-SKAL-19-002

Dear Mr. Dolk:

The New Mexico Environment Department (NMED, the Department) has reviewed the Permittee's , *"Request for Permit Modification to the Facility's Part B Permit"*, submitted by Safety-Kleen Systems, Inc., Owner and Operator (the Permittee) of the Albuquerque Container and Tank Storage Center (the Facility). In the submittal the Permittee requested for changes to be made to the Contingency Plan of the current Operating Permit, to reflect changes in the Emergency Contact list with current information, and also to correct a few typographic errors.

All the changes of the proposed modification are in Permit Attachment D, Table D.1, where the Emergency Coordinator List was updated to include the home address of Mr. Scott Dolk, the Primary Emergency Coordinator (EC), and to replace Elizabeth Thomas, the former Alternate Emergency Coordinator, (AEC) with Nicholas Gipson, the Material Handler. The office and home addresses and telephone numbers of both Mr. Dolk and Mr. Gipson have been updated pursuant to the requirements of 40 CFR §264.52(d).

A clarification was added to Table D.1 to note that the intercom is engaged by dialing #6. In addition, a typo was corrected changing MSDS to SDS in Section D.4.1.8.

Following review of the Permit modification proposal, NMED determined that it is a Class 1 Permit Modification not requiring Agency approval. Since the Permit Modification is a self-implementing change that does not require approval from NMED, the Permittee must send a notice of the modification to all persons on the facility mailing list previously received from the Department. The notification must be made within 90 calendar days after the change is put into effect, as required by 40 CFR §270.42(a)(ii).

The Permittee must also incorporate the attached updated clean copies of Permit Attachment D into the current operating permit, upon receipt of this letter.

Further, the New Mexico Hazardous Waste Management Fee Regulations 20.4.2 NMAC require assessment of fees when administrative review of a document is complete. NMED has attached an invoice to this letter. Payment of the fees is due within sixty (60) calendar days from the date that you receive the invoice.

If payment is by check, then you must provide the invoice number on the check. If payment is transmitted electronically, then you must submit a letter to Mr. Brian Holton, NMED Hazardous Waste Bureau, indicating the invoice number, payment amount, and the assessed activity prior to transferring funds.

Should the Permittee need to request an extension of the sixty-day period the request must be submitted at least seven days prior to the end of the sixty-day period. Should the Permittee disagree with the fee assessed you may file an Administrative Appeal under the provisions of 20.4.2.302 NMAC.

Please contact Cornelius Amindyas of my staff at (505) 222-9543, if you have further questions on this correspondence.

Sincerely,

Kevin Pierard
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
C. Amindyas, NMED HWB
C. Duran NMED HWB
L. King, EPA Region 6 (6LCRRC)

File: SKAL 2020 and Reading

New Mexico
Environment Department
Hazardous Waste Bureau

Safety Kleen Systems, Inc.
Albuquerque Facility
2720 Girard Avenue NE
Albuquerque, NM 87107
Attn: Jason Blaylock

May 28, 2020

Invoice # - HWB-SKAL-19-002

Request for Class 1 Modification to the RCRA Part B Permit

Quantity	Item	Item Cost	Total Cost
1	Class 1 (without prior approval)	$500.00	$500.00
		Total Fees	$500.00
		Adjustment	$0.00
		Pay This Amount	**$500.00**

Make Checks Payable to: NMED/HWB

Mail Checks and Invoice to:

New Mexico Environment Department, HWB
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, NM 87505

When you provide a check as payment, you authorize the State of New Mexico to either use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

Check Number: _____ Amount Received: _____

Date Received: _____

PERMIT ATTACHMENT D CONTINGENCY PLAN

D.1 PURPOSE

The Contingency Plan describes the actions to be taken in the event of a spill, fire, explosion, or other emergency.

The Contingency Plan shall be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment. The Contingency Plan shall be kept at the Facility Office. The Branch Manager shall ensure that the Contingency Plan is updated whenever a change is made. Modifications to this Contingency Plan shall be conducted in accordance with 40 CFR 270.42.

D.2 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to the Albuquerque Fire and Police Departments and the Presbyterian Hospital. They may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan shall be reviewed and updated, if necessary, whenever:

a. The facility is modified to allow new wastes to be stored or treated, or applicable regulations are revised;
b. The list or location of emergency equipment changes;
c. The facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
   (1) increases the potential for fires, explosions, or releases of hazardous constituents, or
   (2) changes the response necessary in an emergency;
d. The names, addresses, or phone numbers of Emergency Coordinators change;
e. The employee assigned to each emergency task changes jobs; or
f. The plan fails when implemented in an emergency.
g. Other changes if a deficiency is identified.

D.3 EMERGENCY RESPONSE PERSONNEL

D.3.1 Emergency Coordinator Responsibilities

The Branch Manager is the Emergency Coordinator; and the Alternate Emergency Coordinator is a trained employee designated to this position by the Branch Manager. However, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan.

The Emergency Coordinator and Alternate must be familiar with all aspects of this Contingency Plan, the operations and activities at the facility, the location and characteristics of hazardous waste managed and stored at the Facility, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the Contingency Plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Table D.1. At least one employee shall be at the facility or on call to respond to an emergency. A list of emergency equipment available at the facility is included as Table D.3. In addition, facility personnel shall be aware of the location of emergency equipment.

TABLE D.1
Emergency Coordinator List for the Facility

Facility Emergency Coordinators

Primary	**Alternate**
Scott Dolk	~~Elizabeth Thomas~~
Branch Manager	~~Lead Secretary~~
2720 Girard Blvd, NE	~~2720 Girard Blvd, NE~~
Albuquerque, NM 87108	~~Albuquerque, NM 87108~~
Main (Office) Phone (505) 346-2614	~~Main (Office) Phone (505) 884-2277~~
Cell Phone (505) 506-6360	~~Cell Phone (505) 328-7243~~
Scott Dolk	Nicholas Gipson
Branch Manager	Material Handler
1515 Satin Lane	8 Sego Place
Bosque Farms, NM 87068	Los Lunas, NM 87031
Main (office) Phone (505) 346-2614	Main (office) Phone (505) 884-2277
Cell Phone (505) 506-6360	Cell Phone (505) 239-1806
	Home Cell Phone (505) 544-9502

Additional Emergency Notification Phone Numbers

Internal (24-Hour)	(800) 468-1760
~~Safety-Kleen~~	~~(800) 468-1760~~

External

National Response Center	(800) 424-8802
New Mexico Environment Department	(505) 476-6000; (505) 827-9329 (24 Hour)

Designated Emergency Response Authorities

Albuquerque Fire Department (emergency)	911; Station #13 [Non-emergency (505)888-8178]
Albuquerque Police Department (emergency)	911; [Non-emergency (505) 242-2677]
Presbyterian Hospital (emergency)	(505) 222-2995; [Non-emergency (505) 841-1234]
Clean-up contractor; 24-hour	(800) 468-1760
Poison Control Center	(505) 843-2551

Internal Branch Paging System

Intercoms are located on all telephones and can page all offices and warehouse areas to notify employees of an emergency; engage by dialing #6.

D.3.1.1 Assess the Situation

Whenever there is a release, fire, or explosion, the Emergency Coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. In the event of a fire, or explosion or release of toxic gas, the Emergency Coordinator must immediately contact emergency responders (e.g., Albuquerque Fire Department).

D.3.1.2 Protection of Personnel

Concurrently, the Emergency Coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

D.3.1.3 Contain or Mitigate Hazards

During an emergency, the Emergency Coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

D.3.1.4 Post-Emergency Actions

After an emergency has been mitigated and otherwise addressed, the Emergency Coordinator must ensure that all facility equipment and response equipment is properly cleaned and decontaminated (if reusable), and that all waste, spill recovery material and disposable equipment is properly managed and disposed.

D.3.2 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is shown in Table D.1., and explained as follows:

a. The person who discovers/causes the spill reports to the Emergency Coordinator.

b. Based on the information gathered, the Emergency Coordinator will determine if the emergency warrants implementation of the Contingency Plan.

c. The Emergency Coordinator contacts the Safety-Kleen Emergency Response Coordinator and NMED.

d. The Emergency Coordinator will act as an Incident Commander until an outside resource (i.e. Fire Department or Spill Cleanup Contractor) arrives onsite; then they will assume Incident Commander duties.

D.3.3 Government Agencies and Local Authorities to be notified during an Emergency

The following government agencies and local authorities listed in Table D.2 shall be notified during an emergency since the Facility has a memorandum of Agreement with them:

TABLE D.2.

Agency or Authority	Rationale / Service Provided
Albuquerque Police Department	Notify if there is imminent danger to human health. May assist with traffic control and evacuation (if required) if there is imminent danger to human health.
Albuquerque Fire Department	Notify is there is a fire, explosion, uncontrolled spill, or other imminent danger.
Presbyterian Hospital	Assist in providing emergency care of any injuries.
New Mexico Department of Public Safety	Notify if human health or the environment outside the Facility is threatened.
National Response Center	Notify if human health or the environment outside the Facility is threatened.
NMED	Report releases, fires, and explosions.
SK Emergency Response Contractor	Call to obtain assistance with remedial action after a release

The Permittee shall familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility and possible evacuation routes. Arrangements shall also be made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

Notifications, including a copy of the Contingency Plan, shall be provided to local emergency response agencies via mail or email, and a signed acknowledgement form is requested from each entity. If an agency refuses to enter into an agreement, this shall be kept on file. Notification of any significant modifications to the Contingency Plan shall also be provided to these agencies.

D.4 RESPONSIBILITIES THE EMERGENCY COORDINATOR DURING AN EMERGENCY

Whenever there is an imminent or actual emergency that requires implementation of the Contingency Plan, the Emergency Coordinator (or alternate when the Emergency Coordinator is not available) must immediately:

a. Activate the internal facility communication system to notify all facility personnel; Initiate facility evacuation, if necessary
b. Notify appropriate state or local agencies with designated response roles, as necessary. Reference Table D.2 above; and
c. Notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number – (800) 468-1760.

D.4.1 Emergency Response Procedures

Response actions to be taken in specific emergency situations are described in the following sections.

D.4.1.1 Fire Control Procedures

If a small fire occurs, personnel may respond quickly with an appropriately rated fire extinguisher to put out the fire before it spreads. If it cannot be extinguished immediately the facility shall be evacuated and the fire and police departments shall be contacted.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those which can immediately be extinguished using a fire extinguisher. Any fire which cannot be brought under control immediately or which has the potential to become uncontrollable shall warrant implementation of the evacuation plan. Ignitable waste at the Albuquerque facility is stored in specially designed tanks or containers and placed in the Flammable Storage Building.

Safety-Kleen personnel and local authorities must be made aware of appropriate response procedures, should a fire occur at the facility. This may include isolating the hazardous area and donning appropriate positive pressure breathing apparatus.

D.4.1.2 Container Storage Unit-Flammable Warehouse-Fire Control Procedure

A small fire in this area can be assessed by Facility personnel, and if deemed safe to handle, may be extinguished using an ABC-rated fire extinguisher present in this area. Should the automated suppression system activate, personnel shall leave the area and allow the system to extinguish the fire.

The Flammable Storage Warehouse and adjacent Return and Fill is protected by a fire suppression system. The extinguishing medium is water supplied through the City of

Albuquerque. The system is maintained under pressure (approximately 87 pounds per square inch-psi) and consists of 16 sprinkler heads with a discharge capacity of 350 gallons per minute (GPM). If the suppression system activates, the Albuquerque Fire Department shall be notified by Facility personnel, who shall evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel will provide details on inventory and site information to assist the Fire Department.

D.4.1.3 Container Storage Units East and West

A small fire in this area will be assessed by Facility personnel, and if deemed safe to handle, may be extinguished using an ABC-rated fire extinguisher present in this area. If necessary, the Albuquerque Fire Department will be notified by Facility personnel, who shall evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel shall provide details on inventory and site information to assist the Fire Department.

D.4.1.4 Tank Storage Area

There are two 12,000-gallon storage tanks at this facility. One is used for storage of product petroleum naphtha solvent (with a nominal 150°F flash point); and one tank is used for storage of used/spent petroleum naphtha solvent. The tanks are underground storage tanks.

Examples of potential fire response procedures that may be required are described below.

1. Isolate the hazard area and deny entry to unauthorized personnel.
2. Stay upwind, keep out of low areas.
3. Ventilate closed space before entering (if this can be done safely)
4. Wear personal protective clothing.
5. Evacuate an adequately protective radius (if required).

Wastes that may be involved with the fire can be identified by the following methods:

a. Location of the container in the storage unit
b. Label on the container (if safe to observe).
c. Records of wastes stored onsite in the administrative office area

If possible, emergency response personnel shall take measures necessary to collect and contain potentially hazardous run-off of fire suppression material (i.e. water, foam) and the contents of container/s involved. This may require construction of temporary berms or use of absorbent materials to prevent migration to storm drains or sewers.

D.4.1.5 Explosion

Response actions to be taken in the event of an explosion or imminent threat of an explosion are:

- All facility personnel must immediately evacuate the area.
- The Emergency Coordinator must be notified. Due to the small size of the Facility, this notification will most often be by verbal notification if the Emergency Coordinator is onsite; or by telephone if offsite.
- The Emergency Coordinator will immediately make the necessary notifications to the appropriate contacts/agencies listed in Table D.2.
- If required, the Albuquerque Fire Department will be notified by Facility personnel, who will evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel will provide details on inventory and site information to assist the Fire Department.

The procedures detailed in Sections D.4.1 through D.4.3 may be required in the event of an explosion or imminent explosion.

D.4.1.6 Unintended Releases

Response actions to be taken in the event of a release of a hazardous waste or hazardous substance are described in the sections that follow. Employees must assess the possible hazards to human health or the environment (air, water, or soil) that may result from an unintended release. Identification of the material released may consist of review and a Safety Data Sheet (if the material is a Safety-Kleen product), the container label, or the hazardous waste manifest.

D.4.1.7 Minor Spills

A minor spill (as referenced in this Contingency Plan) is a spill that occurs within secondary containment and does not involve a release of material to the environment. This type of spill involves spills and leaks from containers (typically 5-gallon through 250-gallon containers). A minor spill does not necessarily require implementation of the Contingency Plan.

D.4.1.8 Parts Washer Solvent (Petroleum Naphtha)

Transfer of Safety-Kleen's petroleum naphtha solvent is the primary activity where containers are opened and clean and used solvent pumped or emptied. If a spill should occur while pouring used solvent into a dumpster or filling drums with solvent product at the Return and Fill station, it shall be contained in the secondary containment at the base of the Return and Fill station, remedial action shall be conducted as necessary. Any material released into the secondary containment shall be recovered by absorbent materials that will be properly managed as site-generated waste. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents shall be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a permitted facility for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse or Return and Fill Tank, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse are prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows shall be opened to improve the ventilation in the confined area. If solvent is spilled or is flowing in a non-explosion rated area, all sources of ignition (e.g., thermostats or light switches) shall be left in the same position (either on or off) as at the time of the spill. The worker shall enter the area wearing appropriate personal protective equipment (PPE). The (~~M~~SDSs) will be consulted to ensure appropriate PPE and spill procedures are utilized. Generally, spilled liquids are collected, placed in a container, and returned to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department (if the spill is of a reportable quantity). In the event a container is leaking, the contents shall be transferred to a new container with a portable pump or a wet/dry vacuum

D.4.1.9 Major Spills

Any spill which cannot be completely remediated is a major spill. Examples of a major spill are: a failure of secondary containment, vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material which escapes containment can contaminate soil, surface water, groundwater, and/or sanitary sewer systems. Safety-Kleen's Emergency response protocol for this type of spill must be as follows:

a. Assist any injured people and call for medical assistance as necessary.

b. Stop the flow of material, if possible.

c. Retain, contain or slow the flow of the material if it cannot be stopped.

d. If solvent escapes containment efforts, immediately call the local Fire Department, and report to the Emergency Coordinator and the Safety-Kleen Emergency Response Coordinator.

e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The Emergency Coordinator shall report any incident as soon as possible to the Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number: 800/468-1760. The Emergency Coordinator shall call an emergency cleanup response contractor, if it is deemed necessary. The incident shall be reported to the National Response Center (telephone: 800/424-8802) and NMED (telephone: 505/827-9329 24-hour number), and the New Mexico Department of Public Safety (telephone (505) 827-9282.

The person reporting a spill must be prepared to give:

1. Their name, position;
2. The Company name, address, and telephone number;
3. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, the containment status and specify any equipment needed; and
4. The extent of injuries (if any).

Equipment used to respond to spills must be cleaned and decontaminated with a detergent/water solution. All incidents will be documented and kept on file as part of the operating record and reviewed with branch personnel to prevent similar spills from occurring in the future.

All rinsates, waste residues, and decontamination fluids from the cleanup of spills or releases (whether major or minor), shall be containerized and managed as hazardous waste unless analytical results verify the wastes are not hazardous. Wastes resulting from spill cleanups shall be disposed in accordance with applicable regulations.

D.4.1.10 Response to Release from Tanks

The tanks at this Facility are underground storage tanks. Any release will be detected by the interstitial monitoring system (Veeder-Root) or by noting unexplained inventory deviations. The following actions will be taken:

- All transfers into the tank will be stopped immediately.
- As soon as practicable, remove as much of the material in the tank as practicable to prevent further releases of the material to the environment. This will typically be accomplished by transferring material into containers or pumping into a tanker.
- Containment of released material shall begin as soon as practicable.
- Report the release to the NMED Hazardous Waste Bureau in accordance with the applicable parts of Permit Section1.9.9.
- Implement Emergency Interim Measures, if necessary, in accordance with Permit Section 7.8.3.
- Initiate corrective action as necessary in accordance with Permit Part 7.

- If investigation indicates a major repair is needed to the tank system, implement the repairs and obtain certification by a qualified Professional Engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. Records of the repairs and the certification shall be placed in the Operating Record and maintained until closure of the facility.

D.4.1.11 **Emergency Equipment** - Table D-3 contains a list of Emergency Equipment available at the Facility.

TABLE D.3

Description	Location	Quantity	Capabilities
Dry Chemical Fire Extinguishers-Hand held (type ABC)	Office area, warehouse, storage shed, return and fill shed	12	Able to extinguish type A, B, and C fires
Fire Suppression System	Flammable Storage Warehouse and Return and Fill	1	Able to contain and/or extinguish fire when activated
First Aid Kits	Office/warehouse area	2	Provides items used to give basic medical attention
Eye wash station	Warehouse area, at return and fill	3	Provide a means of rinsing possibly harmful substances from the eyes and skin
Shower	Office area, warehouse area	2	Decontaminate plant personnel in the event of a spill or release of harmful material
Telephones/paging system	Office/warehouse area, return and fill	8	Alert personnel of an on-site emergency or spill incident, evacuation orders and general in-plant communications
Alert horn/strobe light	Tank farm	1	Sounds and flashes when tanks are at 95% capacity
Spill Kits / Absorbents	Tank farm, warehouse, return and fill areas	3	Able to contain and absorb spilled liquids

			There is also a supply of absorbents for sale that can be accessed in the event of an emergency

D.5. FACILITY EVACUATION PLAN

When an uncontrolled fire or release has occurred, all personnel shall be evacuated from the area and assembled across Girard Boulevard to ensure that all personnel are accounted for and out of the area. The order for evacuation may be given by verbal announcement via the facility paging system or by verbal cry/shout. The City of Albuquerque Fire Department must be notified at the time of evacuation either from a safe on-site building, from a neighboring facility, or using a cellular phone.

Exits shall be clearly marked in the warehouses and office areas. Employees shall be trained to be aware of all potential escape routes. The Facility evacuation plan is presented in Figure 6, Permit Attachment L (Figures).

D.6 POST EMERGENCY ACTIONS

Immediately after an emergency, the Emergency Coordinator must ensure that the following activities are not conducted in the affected area(s) of the Facility:

a. Monitoring for possible leaks, pressure buildup, and ruptures in pipes or valves does not occur until normal operations are resumed;

b. No substance that may be incompatible with the released material shall be brought on site until cleanup procedures are completed; and

c. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use (if reusable) or is replaced before operations are resumed.

D.7 REPORTING

The Permittee shall notify all appropriate state and local authorities that the Facility is in compliance before operations are resumed in the affected area(s) of the Facility.

The Emergency Coordinator must document the time, date, and details of any incident that requires the implementation of the Contingency Plan. Within 5 days of the incident, the Permittee shall submit a written report on the incident to the New Mexico Environment Department in accordance with Permit Section 1.9.9. At a minimum, the report shall contain the following:

a. Name, address, and telephone number of the owner or operator;

b. Name, address, and telephone number of the facility;
c. Date, time, and type of incident (e.g., fire, explosion);
d. Name and quantity of material(s) involved;
e. The extent of injuries, if any;
f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
g. Estimated quantity and disposition of recovered material that results from the incident.

PERMIT ATTACHMENT D CONTINGENCY PLAN

D.1 PURPOSE

The Contingency Plan describes the actions to be taken in the event of a spill, fire, explosion, or other emergency.

The Contingency Plan shall be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment. The Contingency Plan shall be kept at the Facility Office. The Branch Manager shall ensure that the Contingency Plan is updated whenever a change is made. Modifications to this Contingency Plan shall be conducted in accordance with 40 CFR 270.42.

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TABLE D.1
Emergency Coordinator List for the Facility

Office Addresses

Primary	**Alternate**
Scott Dolk	Nicholas Gipson
Branch Manager	Material Handler
2720 Girard Blvd, NE	2720 Girard Blvd, NE
Albuquerque, NM 87108	Albuquerque, NM 87108
Main (Office) Phone (505) 346-2614	Main (Office) Phone (505) 346-2614
Cell Phone (505) 506-6360	Cell Phone (505) 239-1806

Home Addresses

Scott Dolk	Nicholas Gipson
Branch Manager	Material Handler
1515 Satin Lane	8 Sego Place
Bosque Farms, NM 87068	Los Lunas, NM 87031
Home Phone (505) 220-6867	Home Phone (505) 544-9502

Additional Emergency Notification Phone Numbers

Internal (24-Hour)	(800) 468-1760
External	
National Response Center	(800) 424-8802
New Mexico Environment Department	(505) 476-6000; (505) 827-9329 (24 Hour)

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Intercoms are located on all telephones and can page all offices and warehouse areas to notify employees of an emergency; engage by dialing #6.

D.3.1.1 Assess the Situation

Whenever there is a release, fire, or explosion, the Emergency Coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. In the event of a fire, or explosion or release of toxic gas, the Emergency Coordinator must immediately contact emergency responders (e.g., Albuquerque Fire Department).

D.3.1.2 Protection of Personnel

Concurrently, the Emergency Coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

D.3.1.3 Contain or Mitigate Hazards

During an emergency, the Emergency Coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

D.3.1.4 Post-Emergency Actions

After an emergency has been mitigated and otherwise addressed, the Emergency Coordinator must ensure that all facility equipment and response equipment is properly cleaned and decontaminated (if reusable), and that all waste, spill recovery material and disposable equipment is properly managed and disposed.

D.3.2 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is shown in Table D.1., and explained as follows:

a. The person who discovers/causes the spill reports to the Emergency Coordinator.

b. Based on the information gathered, the Emergency Coordinator will determine if the emergency warrants implementation of the Contingency Plan.

c. The Emergency Coordinator contacts the Safety-Kleen Emergency Response Coordinator and NMED.

d. The Emergency Coordinator will act as an Incident Commander until an outside resource (i.e. Fire Department or Spill Cleanup Contractor) arrives onsite; then they will assume Incident Commander duties.

D.3.3 Government Agencies and Local Authorities to be notified during an Emergency

The following government agencies and local authorities listed in Table D.2 shall be notified during an emergency since the Facility has a memorandum of Agreement with them:

TABLE D.2.

Agency or Authority	Rationale / Service Provided
Albuquerque Police Department	Notify if there is imminent danger to human health. May assist with traffic control and evacuation (if required) if there is imminent danger to human health.
Albuquerque Fire Department	Notify is there is a fire, explosion, uncontrolled spill, or other imminent danger.
Presbyterian Hospital	Assist in providing emergency care of any injuries.
New Mexico Department of Public Safety	Notify if human health or the environment outside the Facility is threatened.
National Response Center	Notify if human health or the environment outside the Facility is threatened.
NMED	Report releases, fires, and explosions.
SK Emergency Response Contractor	Call to obtain assistance with remedial action after a release

The Permittee shall familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility and possible evacuation routes. Arrangements shall also be made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

Notifications, including a copy of the Contingency Plan, shall be provided to local emergency response agencies via mail or email, and a signed acknowledgement form is requested from each

entity. If an agency refuses to enter into an agreement, this shall be kept on file. Notification of any significant modifications to the Contingency Plan shall also be provided to these agencies.

D.4 RESPONSIBILITIES THE EMERGENCY COORDINATOR DURING AN EMERGENCY

Whenever there is an imminent or actual emergency that requires implementation of the Contingency Plan, the Emergency Coordinator (or alternate when the Emergency Coordinator is not available) must immediately:

a. Activate the internal facility communication system to notify all facility personnel; Initiate facility evacuation, if necessary
b. Notify appropriate state or local agencies with designated response roles, as necessary. Reference Table D.2 above; and
c. Notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number – (800) 468-1760.

D.4.1 Emergency Response Procedures

Response actions to be taken in specific emergency situations are described in the following sections.

D.4.1.1 Fire Control Procedures

If a small fire occurs, personnel may respond quickly with an appropriately rated fire extinguisher to put out the fire before it spreads. If it cannot be extinguished immediately the facility shall be evacuated and the fire and police departments shall be contacted.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those which can immediately be extinguished using a fire extinguisher. Any fire which cannot be brought under control immediately or which has the potential to become uncontrollable shall warrant implementation of the evacuation plan. Ignitable waste at the Albuquerque facility is stored in specially designed tanks or containers and placed in the Flammable Storage Building.

Safety-Kleen personnel and local authorities must be made aware of appropriate response procedures, should a fire occur at the facility. This may include isolating the hazardous area and donning appropriate positive pressure breathing apparatus.

D.4.1.2 Container Storage Unit-Flammable Warehouse-Fire Control Procedure

A small fire in this area can be assessed by Facility personnel, and if deemed safe to handle, may be extinguished using an ABC-rated fire extinguisher present in this area. Should the automated

suppression system activate, personnel shall leave the area and allow the system to extinguish the fire.

The Flammable Storage Warehouse and adjacent Return and Fill is protected by a fire suppression system. The extinguishing medium is water supplied through the City of Albuquerque. The system is maintained under pressure (approximately 87 pounds per square inch-psi) and consists of 16 sprinkler heads with a discharge capacity of 350 gallons per minute (GPM). If the suppression system activates, the Albuquerque Fire Department shall be notified by Facility personnel, who shall evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel will provide details on inventory and site information to assist the Fire Department.

D.4.1.3 Container Storage Units East and West

A small fire in this area will be assessed by Facility personnel, and if deemed safe to handle, may be extinguished using an ABC-rated fire extinguisher present in this area. If necessary, the Albuquerque Fire Department will be notified by Facility personnel, who shall evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel shall provide details on inventory and site information to assist the Fire Department.

D.4.1.4 Tank Storage Area

There are two 12,000-gallon storage tanks at this facility. One is used for storage of product petroleum naphtha solvent (with a nominal 150°F flash point); and one tank is used for storage of used/spent petroleum naphtha solvent. The tanks are underground storage tanks.

Examples of potential fire response procedures that may be required are described below.

1. Isolate the hazard area and deny entry to unauthorized personnel.
2. Stay upwind, keep out of low areas.
3. Ventilate closed space before entering (if this can be done safely)
4. Wear personal protective clothing.
5. Evacuate an adequately protective radius (if required).

Wastes that may be involved with the fire can be identified by the following methods:

a. Location of the container in the storage unit
b. Label on the container (if safe to observe).
c. Records of wastes stored onsite in the administrative office area

If possible, emergency response personnel shall take measures necessary to collect and contain potentially hazardous run-off of fire suppression material (i.e. water, foam) and the contents of

container/s involved. This may require construction of temporary berms or use of absorbent materials to prevent migration to storm drains or sewers.

D.4.1.5 Explosion

Response actions to be taken in the event of an explosion or imminent threat of an explosion are:

- All facility personnel must immediately evacuate the area.
- The Emergency Coordinator must be notified. Due to the small size of the Facility, this notification will most often be by verbal notification if the Emergency Coordinator is onsite; or by telephone if offsite.
- The Emergency Coordinator will immediately make the necessary notifications to the appropriate contacts/agencies listed in Table D.2.
- If required, the Albuquerque Fire Department will be notified by Facility personnel, who will evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel will provide details on inventory and site information to assist the Fire Department.

The procedures detailed in Sections D.4.1 through D.4.3 may be required in the event of an explosion or imminent explosion.

D.4.1.6 Unintended Releases

Response actions to be taken in the event of a release of a hazardous waste or hazardous substance are described in the sections that follow. Employees must assess the possible hazards to human health or the environment (air, water, or soil) that may result from an unintended release. Identification of the material released may consist of review and a Safety Data Sheet (if the material is a Safety-Kleen product), the container label, or the hazardous waste manifest.

D.4.1.7 Minor Spills

A minor spill (as referenced in this Contingency Plan) is a spill that occurs within secondary containment and does not involve a release of material to the environment. This type of spill involves spills and leaks from containers (typically 5-gallon through 250-gallon containers). A minor spill does not necessarily require implementation of the Contingency Plan.

D.4.1.8 Parts Washer Solvent (Petroleum Naphtha)

Transfer of Safety-Kleen's petroleum naphtha solvent is the primary activity where containers are opened and clean and used solvent pumped or emptied. If a spill should occur while pouring used solvent into a dumpster or filling drums with solvent product at the Return and Fill station, it shall be contained in the secondary containment at the base of the Return and Fill station,

remedial action shall be conducted as necessary. Any material released into the secondary containment shall be recovered by absorbent materials that will be properly managed as site-generated waste. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents shall be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a permitted facility for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse or Return and Fill Tank, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse are prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows shall be opened to improve the ventilation in the confined area. If solvent is spilled or is flowing in a non-explosion rated area, all sources of ignition (e.g., thermostats or light switches) shall be left in the same position (either on or off) as at the time of the spill. The worker shall enter the area wearing appropriate personal protective equipment (PPE). The (SDSs) will be consulted to ensure appropriate PPE and spill procedures are utilized. Generally, spilled liquids are collected, placed in a container, and returned to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department (if the spill is of a reportable quantity). In the event a container is leaking, the contents shall be transferred to a new container with a portable pump or a wet/dry vacuum

D.4.1.9 Major Spills

Any spill which cannot be completely remediated is a major spill. Examples of a major spill are: a failure of secondary containment, vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material which escapes containment can contaminate soil, surface water, groundwater, and/or sanitary sewer systems. Safety-Kleen's Emergency response protocol for this type of spill must be as follows:

a. Assist any injured people and call for medical assistance as necessary.

b. Stop the flow of material, if possible.

c. Retain, contain or slow the flow of the material if it cannot be stopped.

d. If solvent escapes containment efforts, immediately call the local Fire Department, and report to the Emergency Coordinator and the Safety-Kleen Emergency Response Coordinator.

e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The Emergency Coordinator shall report any incident as soon as possible to the Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number: 800/468-1760. The Emergency Coordinator shall call an emergency cleanup response contractor, if it is deemed necessary. The incident shall be reported to the National Response Center (telephone: 800/424-8802) and NMED (telephone: 505/827-9329 24-hour number), and the New Mexico Department of Public Safety (telephone (505) 827-9282.

The person reporting a spill must be prepared to give:

1. Their name, position;
2. The Company name, address, and telephone number;
3. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, the containment status and specify any equipment needed; and
4. The extent of injuries (if any).

Equipment used to respond to spills must be cleaned and decontaminated with a detergent/water solution. All incidents will be documented and kept on file as part of the operating record and reviewed with branch personnel to prevent similar spills from occurring in the future.

All rinsates, waste residues, and decontamination fluids from the cleanup of spills or releases (whether major or minor), shall be containerized and managed as hazardous waste unless analytical results verify the wastes are not hazardous. Wastes resulting from spill cleanups shall be disposed in accordance with applicable regulations.

D.4.1.10 Response to Release from Tanks

The tanks at this Facility are underground storage tanks. Any release will be detected by the interstitial monitoring system (Veeder-Root) or by noting unexplained inventory deviations. The following actions will be taken:

- All transfers into the tank will be stopped immediately.
- As soon as practicable, remove as much of the material in the tank as practicable to prevent further releases of the material to the environment. This will typically be accomplished by transferring material into containers or pumping into a tanker.

- Containment of released material shall begin as soon as practicable.
- Report the release to the NMED Hazardous Waste Bureau in accordance with the applicable parts of Permit Section1.9.9.
- Implement Emergency Interim Measures, if necessary, in accordance with Permit Section 7.8.3.
- Initiate corrective action as necessary in accordance with Permit Part 7.
- If investigation indicates a major repair is needed to the tank system, implement the repairs and obtain certification by a qualified Professional Engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. Records of the repairs and the certification shall be placed in the Operating Record and maintained until closure of the facility.

D.4.1.11 **Emergency Equipment** - Table D-3 contains a list of Emergency Equipment available at the Facility.

TABLE D.3

Description	Location	Quantity	Capabilities
Dry Chemical Fire Extinguishers-Hand held (type ABC)	Office area, warehouse, storage shed, return and fill shed	12	Able to extinguish type A, B, and C fires
Fire Suppression System	Flammable Storage Warehouse and Return and Fill	1	Able to contain and/or extinguish fire when activated
First Aid Kits	Office/warehouse area	2	Provides items used to give basic medical attention
Eye wash station	Warehouse area, at return and fill	3	Provide a means of rinsing possibly harmful substances from the eyes and skin
Shower	Office area, warehouse area	2	Decontaminate plant personnel in the event of a spill or release of harmful material
Telephones/paging system	Office/warehouse area, return and fill	8	Alert personnel of an on-site emergency or spill incident, evacuation orders

			and general in-plant communications
Alert horn/strobe light	Tank farm	1	Sounds and flashes when tanks are at 95% capacity
Spill Kits / Absorbents	Tank farm, warehouse, return and fill areas	3	Able to contain and absorb spilled liquids There is also a supply of absorbents for sale that can be accessed in the event of an emergency

D.5. FACILITY EVACUATION PLAN

When an uncontrolled fire or release has occurred, all personnel shall be evacuated from the area and assembled across Girard Boulevard to ensure that all personnel are accounted for and out of the area. The order for evacuation may be given by verbal announcement via the facility paging system or by verbal cry/shout. The City of Albuquerque Fire Department must be notified at the time of evacuation either from a safe on-site building, from a neighboring facility, or using a cellular phone.

Exits shall be clearly marked in the warehouses and office areas. Employees shall be trained to be aware of all potential escape routes. The Facility evacuation plan is presented in Figure 6, Permit Attachment L (Figures).

D.6 POST EMERGENCY ACTIONS

Immediately after an emergency, the Emergency Coordinator must ensure that the following activities are not conducted in the affected area(s) of the Facility:

a. Monitoring for possible leaks, pressure buildup, and ruptures in pipes or valves does not occur until normal operations are resumed;

b. No substance that may be incompatible with the released material shall be brought on site until cleanup procedures are completed; and

c. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use (if reusable) or is replaced before operations are resumed.

D.7 REPORTING

The Permittee shall notify all appropriate state and local authorities that the Facility is in compliance before operations are resumed in the affected area(s) of the Facility.

The Emergency Coordinator must document the time, date, and details of any incident that requires the implementation of the Contingency Plan. Within 5 days of the incident, the Permittee shall submit a written report on the incident to the New Mexico Environment Department in accordance with Permit Section 1.9.9. At a minimum, the report shall contain the following:

a. Name, address, and telephone number of the owner or operator;
b. Name, address, and telephone number of the facility;
c. Date, time, and type of incident (e.g., fire, explosion);
d. Name and quantity of material(s) involved;
e. The extent of injuries, if any;
f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
g. Estimated quantity and disposition of recovered material that results from the incident.