



FEDERAL EXPRESS

June 11, 1990
RO 90-202

Ms. A. Elizabeth Gordon, Ph.D.
New Mexico Health and Environment Department
1190 St. Francis Drive
Santa Fe, NM 87503

Subject: Farmington Service Center

Dear Dr. Gordon,

This has been prepared in response to your letter dated May 4, 1990.
Please find enclosed responses to your comments, revised text and
exhibits for the subject facility.

If you have any questions or require further information, please contact
me on extension 2550.

Sincerely,

Rob Omiecinski

Rob Omiecinski
Environmental Permit Writer

RO/dfs

cc: W. Johnson, Denver Reg. Mgr.
Br. Mgr. (7-008-21)
B. Wachsmuth
W. Vines

STORAGE FACILITY
PERMIT APPLICATION
SAFETY-KLEEN CORP. SERVICE CENTER
FARMINGTON, NEW MEXICO
NMD 980698849

Prepared by: SAFETY-KLEEN CORP.

September 14, 1987

Revised: June 11, 1990

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Safety-Kleen 1986 Annual Report

FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS: Safety-Kleen Corp.
777 Big Timber Road
Elgin, IL 60123
708/697-8460

RESPONSIBLE OFFICIALS: David A. Dattilo
Vice President, Sales and Service

Scott E. Fore
Vice President, Environment, Health and Safety

FACILITY ADDRESS: Safety-Kleen Corp. (7-008-21)
4200 A Hawkins Rd.
Farmington, New Mexico 87401

TELEPHONE NUMBER: 502/327-9070

U.S. EPA I.D. NUMBER: NMD 980698849

GEOGRAPHIC LOCATION: 36° 44' 20" N
108° 14' 11" W

OWNER: Comet Corp.
1215 Brentwood Circle
Farmington, New Mexico 87401

DATE OPERATIONS BEGAN: January 1, 1981

DESCRIPTION OF ACTIVITIES: This facility is an accumulation point for spent solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer and then returned to the Company's customers as product.

PROPERTY DESCRIPTION: .80 acres with the following structures:

- a. one building with offices and a warehouse for container storage;
- b. two aboveground storage tanks (one for product and one for spent solvent) with concrete diking; and
- c. one loading dock with a solvent return and fill station.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT(GAL.)	MATERIAL TO BE STORED
Tank	12,000	18,266	Spent Mineral Spirits Solvent (D001, D006, D008)
Container Storage-- Warehouse	4,464	448.8	Spent Immersion Cleaner (F002, F004) Dry Cleaning Waste (F002)

1.0 FACILITY DESCRIPTION

1.1 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Corp. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. The company has been operating since 1968 offering solvent collection and reclamation services for its 400,000 customers, more than 99% of whom generate less than 1000 kilograms (2200 pounds) per month. In 1989, Safety-Kleen reclaimed more than 40 million gallons of spent solvent.

Currently, Safety-Kleen offers five services, three of which involve the accumulation and storage of spent solvent at 164 service centers in 46 states. These wastes are shipped from the service centers to one of seven Safety-Kleen recycle centers or to an independent reclaimer and are then returned to customers as usable product. A unique feature of this system is that Safety-Kleen retains ownership of the parts cleaning machines and the solvent. This "closed loop" system allows the Company to maintain control of the solvent except while it is in use at the customer's place of business. A description of each of these three services follows.

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a 16- or 30-gallon drum containing Safety-Kleen 105 Solvent (mineral spirits). On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the drum of used solvent with one of clean product. Each sales representative performs about fifteen of these services per day, collecting the drums of used solvent on a route van.

At the end of each day, the solvent is transferred from the drums to a storage tank at the service center and drums of product are prepared for the next day's services. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the spent solvent at the service center. Two-thirds of the solvent used by Safety-Kleen customers has been reclaimed with the remainder being purchased from a vendor.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a 16-gallon drum containing a chlorinated solvents/cresylic acid blend. The spent solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse. Periodically, a box trailer truck is dispatched from a recycle center to deliver drums of fresh solvent and collect the drums of spent solvent for reclamation.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are drummed on the customer's premises and are periodically collected by a sales representative. The drummed waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. About 35% of this waste is returned to dry cleaners as usable product.

In accordance with 40 CFR 264.73, Safety-Kleen maintains a manifest system, an operating log, biennial reports and all other records required under these sections.

The operating record must include: 1) a record of hazardous waste shipments rejected by the facility including the following:

- a. the name of the generator and transporter,
 - b. the manifest number,
 - c. the date the shipment was rejected, and
 - d. the reason for rejection;
- 2) personal training records for all current personnel; and
- 3) The contents of the waste storage tank, the quantity of each waste received, and the date each period of accumulation begins (i.e., the date each waste solvent pickup occurs) must also be included in the operating record.

A biennial report must be submitted by March 1 of each even numbered year. The biennial report shall be submitted on form 8700-13B. The report shall cover facility activities during the previous calendar year and shall include all of the following information:

- (a) The EPA identification number, name, and address of the facility.
- (b) The calendar year covered by the report.
- (c) For off-site facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year, and, for imported shipments, the name and address of the foreign generator.
- (d) A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities, this information shall be listed by EPA identification number of each generator.
- (e) The method of treatment, storage, or disposal for each hazardous waste.
- (f) The most recent closure cost estimate under 40 CFR 264.142.

(g) The certification signed by the owner or operator of the facility or the owner or operator's authorized representative.

Safety-Kleen must implement the manifesting system required under 40 CFR 264.71.

If the facility receives hazardous waste accompanied by a manifest, the branch manager or his designate shall do all of the following:

(a) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.

(b) Note any significant discrepancies in the manifest on each copy of the manifest.

(c) Within 30 days after the delivery, send a copy of the manifest to the generator.

(d) Retain, at the facility, a copy of each manifest for not less than 3 years from the date of delivery. (Safety-Kleen is the TSDF as well as the transporter so only one copy is kept on file).

(e) Return a copy of the manifest to the director or his or her designee within a period of 10 days after the end of the month in which the waste was received.

The requirements described above do not apply to hazardous waste produced by generators of more than 100 kilograms but less than 1,000 kilograms in a calendar month if both of the following requirements are met:

(a) The waste is reclaimed under a contractual agreement pursuant to which the type and frequency of shipments are specified in the agreement and the vehicle used to transport the waste to the recycling facility and to deliver the regenerated material back to the generator is owned and operated by the reclaimer of the waste.

(b) The generator maintains a copy of the reclamation agreement in his or her files for a period of not less than 3 years after termination or expiration of the agreement.

The facility will not receive bulk shipments of hazardous waste from a rail or water transporter.

When a shipment of hazardous waste is initiated from this facility, the branch manager or his designate must:

(a) Prepare a manifest before transporting the waste off-site.

(b) Designate on the manifest one facility which is licensed to handle the waste described on the manifest. The branch manager may also designate on the manifest one alternate facility which is licensed to handle his or her waste if an emergency prevents delivery of the waste to the primary designated facility.

(c) Use a transporter who is properly licensed under the act or a generator-owned vehicle licensed under the act to transport the waste.

(d) If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

Except as described in the next paragraph, the branch manager shall use a manifest form approved by the director which contains all of the following information:

- (a) A manifest document number.
- (b) The generator's name, mailing address, telephone number, and EPA identification number.
- (c) The name and EPA identification number of each transporter.
- (d) The name, address, and EPA identification number of the designated facility and an alternate facility, if any.
- (e) The description of the waste required by regulations of the DOT in the provisions of 49 CFR 172.101, 172.202, and 172.203.
- (f) The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.
- (g) The hazardous waste number describing the waste.
- (h) The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations."
- (i) Other certification statements required by the director based on requirements under title II of the solid waste disposal act.

If the branch manager manifests a shipment of hazardous waste out of state, and if the state to which the shipment is manifested requires the use of another manifest, then the generator shall use that manifest.

The branch manager shall do all of the following when initiating a shipment:

- (a) Sign the manifest certification by hand.
- (b) Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest.
- (c) Retain one copy for his files.
- (d) Submit one copy to the director or his or her designee, which shall be postmarked not later than 10 days after the month in which shipment was made.
- (e) Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the branch manager or his designate must review the manifest and check the information on the manifest for correctness. It should be noted that Safety-Kleen computer-prints most of the required information on the majority of its manifests. The employee checking the manifest must review the names, addresses, EPA and New Mexico I.D. and transporter numbers, the manifest document number and the telephone numbers listed. In addition, the hazardous material (HM) box should be checked, the waste description, DOT classification, DOT I.D. number and EPA Waste Code must be verified. The number of drums and pounds, as well as the symbols for these units must be correct and an "H" must be entered in the last column. The generator,

transporter(s) and TSDF operator must all print and sign their names and enter the date the waste was shipped or received, as appropriate.

Upon discovering a significant manifest discrepancy, the branch manager shall attempt to reconcile the discrepancy with the waste generator or transporter through telephone conversations or otherwise. If the discrepancy is not resolved within 15 days after receiving the waste, the branch manager shall immediately submit, to the director and regional administrator, a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. Significant manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives, as follows:

(a) For bulk waste, significant discrepancies are variations of more than 10% in weight.

(b) For batch waste, a significant discrepancy is any variation in piece count, such as a discrepancy of one drum in a truckload.

(c) Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

1.2 DESCRIPTION OF THE FACILITY

The Farmington service center has been operating as a storage facility since January 1, 1981. The facility consists of the following structures:

- a. a 1,530 square foot warehouse with
offices and a contained area for drum storage;
- b. two 12,000 gallon above-ground storage
tanks, with diking, for clean and spent solvent; and
- c. a solvent return and fill station with a loading dock.

Descriptions of the surrounding area and of waste management practices at the service center follow. Applicable maps and facility drawings are in Appendix C.

1.2.1 Regional Description

The Farmington Service Center is located 600 feet northeast of the intersection of Troy King Road and West Main Street (U.S. Hwy 550) in San Juan County. This area is zoned industrial and to the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may conflict with operations at this site.

The western part of San Juan County is the Navajo Indian reservation. Eastern San Juan County, the location of Farmington, has a total area of 2,182,520 acres or 3,410 square miles. The total population of the area is approximately 50,000 with about 34,000 in Farmington. The major industries in Farmington are involved in the development of gas, oil and coal resources. Abundant rangeland contributed to the growth of the area

through cattle raising and farming, however, this industry has largely declined.

Farmington has a continental climate with an average annual precipitation of 6 inches and total annual snowfall of 9 inches. The average temperature in winter is 44° F and the average summer temperature is 71° F. The average daily temperature range is 33 degrees. An average of 40 thunderstorms occur each year and prevailing winds are east-west.

San Juan County is in the San Juan Basin part of the Navajo section of the Colorado Plateau physiographic province. This area is a structural depression containing deep Tertiary till on rocks of late Cretaceous age. Farmington is located in the alluvial fan in the entrenched San Juan and Animas Rivers. The service center is not in the flood plain of either river. The elevation at the site is 5,470 feet above sea level. The San Juan River provides the principal drainage route for the area and the Animas River is its main tributary.

The soil in the area of the service center is the Avalon sandy loam. This is a deep well-drained soil on mesas and plateaus which formed in alluvial and eolian material derived from sandstone and shale. This soil is moderately permeable with slopes ranging from 5 to 8 percent.

The city of Farmington obtains its water primarily from the Animas River through two pump stations. Pump station 1 is located about two miles east of Farmington and pump station 2 and the Bee Line reservoir are several miles northeast of Farmington. Standby water is obtained from a

pump station several miles south of Farmington on the San Juan River. The service center obtains water from the city of Farmington via a 6" water line on Hawkins Road. A drop inlet to the city storm sewer system is located approximately 500 feet west of the service center. Sewage is collected in a septic tank.

There are no known oil or gas wells within a mile of the service center. No parks, schools, wetlands or critical habitats exist within one mile of the service center.

The non-building areas of the facility are paved with asphalt, concrete or gravel, as noted on the Site Plan in Appendix C. The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station and this area is paved with asphalt and concrete. The entrance to the facility is on Hawkins Road which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The route van that daily travels the routes between the service center and its customers uses the two-lane approach driveway. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area.

1.2.2 Waste Management Practices

The Farmington service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-

Kleen. The aboveground storage tanks, drum storage areas and return and fill station all have secondary containment and the service center has the equipment necessary for employees to safely manage wastes onsite. Appendix C contains drawings of the waste management facilities.

Spent mineral spirits from parts washers is accumulated in a 12,000 gallon aboveground storage tank via the return and fill station. 16- and 30-gallon drums containing seven and twelve gallons of spent solvent, respectively, are poured into the dumpsters in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill station has secondary containment in the form of a 17'6" x 11'2" x 0.5' (730 gallons) concrete pan at its base.

The aboveground tanks have been designed in accordance with NFPA standards and are constructed of carbon steel painted white to reflect sunlight. The secondary containment is a steel reinforced concrete dike measuring 37' x 22' x 3' which holds 18,266 gallons. Two tanks holding 12,000 gallons each are in the diked area; one is for clean and one is for spent mineral spirits. Each tank is equipped with an audiovisual high level alarm.

The container storage area in the warehouse is used only for the storage of (1) spent immersion cleaner and (2) dry cleaning wastes. The wastes are not mixed while on site and different wastes are segregated in color-coded drums to indicate their contents: immersion cleaner in gray 16-gallon drums, and dry cleaning waste in 16-gallon drums with blue lock rings and in boxes. While the wastes are not incompatible with one

another, it is necessary to segregate them for inventory and quality control purposes.

The drum storage area has secondary containment in the form of a six inch wide by four inch high steel reinforced concrete curb with a 12' x 2' x 2.5' (448.8 gallons) collection trench. No more than 4,464 gallons of spent solvents will be stored in the drum storage area at any time.

The containers will be stored in the configurations shown on the Floor Plan in Appendix C. Two feet of aisle space will be maintained and the drums will be stored no more than two high. Containers in the drum storage areas will be placed on pallets and moved with a forklift or pallet jack.

WASTE ANALYSIS PLAN

ABSTRACT

<u>Waste Description</u>	<u>EPA Waste Code Nos.</u>	<u>Facility¹ Capacity</u>	<u>Annual² Amount</u>
Spent Mineral Spirits	D001, D006, D008	12,000	50
Bottom Sediment From the Tank	D001, D006, D008	N/A	2
Spent Immersion Cleaner	F002, F004	4,464 ³	3
Dry Cleaning Waste	F002		6

¹ The facility capacity is in gallons.

² The annual amount is in thousands of gallons.

³ The total amount of drummed waste stored in the warehouse will not exceed 4,464 gallons.

2.0 WASTE ANALYSIS PLAN

2.1 DESCRIPTION OF WASTES

Six types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. Analytical data for the wastes and specifications for the products are in Appendix D and qualitative descriptions follow.

2.1.1 Wastes Resulting From the Parts Washer Service

Spent mineral spirits from parts washers is accumulated in a 12,000 gallon aboveground storage tank via the return and fill station. 16- and 30-gallon drums containing seven and twelve gallons of solvent, respectively, are poured into a dumpster at the return and fill station which in turn empties into the tank. This waste handling method results in three types of mineral spirits waste:

- a. Spent mineral spirits solvent--The spent mineral spirits solvent is removed from the tank by a tanker truck on a scheduled basis. About 6,000-7,000 gallons are removed every two weeks. This waste is ignitable (D001) and EP Toxic (D006 and D008). In 1986, the Farmington service center shipped about 35,000 gallons of spent solvent to the Safety-Kleen recycle center in Denton, Texas.

- b. Bottom sediment in the tank--Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A Safety-Kleen vacuum truck is used for this purpose and can collect up to 2,000 gallons of this waste for reclamation. The sediment is ignitable (D001) and EP Toxic (D006 and D008).

Immersion cleaner remains in the drum in which it was originally used until it is received at the recycle center. Drums containing about four and one-half gallons of spent solvents are stacked two-high in the drum storage area of the warehouse. The immersion cleaner contains chlorinated solvents (F002) and cresylic acid (F004) and the drums are color-coded gray. In 1986, about 1,300 gallons of these solvents were shipped to the Denton, Texas recycle center for reclamation.

2.1.2 Wastes Resulting From the Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in black 16- and blue 30- and 20-gallon drums with blue lock rings. The drums are then palletized, stacked two-high and placed in the drum storage area of the warehouse. While approximately 80% of the dry cleaning solvent used is perchloroethylene (F002), about 17% is mineral spirits, (D001) and the remaining 3% is trichloro-trifluoroethane (F002). In 1987, it is estimated that 2,000 gallons of dry cleaning wastes will be shipped to the Safety-Kleen recycle center in Denton, Texas.

2.2 QUALITY CONTROL PROCEDURES

The used solvents are the primary feedstocks for the generation of Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects spent solvents from about 400 customers, most of whom are small quantity generators, and about 5,000 drums containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

Furthermore, as discussed earlier in the Facility Description, all the materials collected at the service center are managed at all times in the closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

In accordance with HWMR 206.B.3, however, Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has

changed, or when the result of inspection indicates that the waste collected does not match that designated. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been done or the material must be rejected. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

2.2.1 Parts Washer Service

Prior to leasing a parts cleaning machine, the customer's business activity is reviewed. Where the possibility exists for contamination of the mineral spirits (e.g., pesticide, herbicide or pharmaceutical operations), the process is reviewed to insure that the solvent is protected from the sources of contamination.

Sales representatives are instructed to visually examine the spent solvents when the machines are serviced, noting the quantity, odor and appearance of the material recovered:

- a. The quantity of used solvent in the drum--Normally the 16-gallon drum of spent mineral spirits contains approximately seven gallons of liquid, the 30-gallon drum about twelve gallons and the 16-gallon drums of spent immersion cleaner about four and one-half gallons. When the amount of liquid is substantially different from the expected quantity, an inquiry of the customer's operation and handling procedures is made. Contingent on the customer's responses, the solvent is left

with him or accepted. Should there still be questions as to the drum's contents, an analysis is required to determine its acceptability.

- b. The odor of the liquid in the drum--Should the odor of the liquid in the drum be different from that of the mineral spirits or immersion cleaner, the drum is set aside for further action as described in item 'a'.

- c. The appearance of the liquid in the drum--The used mineral spirits should always be greenish-brown in color and float on water. The immersion cleaner is a two phase system consisting of an upper moderately alkaline water layer (20% by volume) and a lower solvent layer (80% by volume). Spent immersion cleaner should have a dark brown aqueous layer on top and the solvent should also be dark brown. Liquids in the drums which deviate from the above descriptions or which contain substantial amounts of water, high density solvent and/or oil at the bottom should be set aside for further action as described in item 'a'.

At the service center, the employee again observes the quantity, odor and appearance of the solvent prior to emptying the solvent into the wet dumpster. Drums with questionable contents are set aside and the customer is questioned. Pending his response, the drum is accepted, returned to the customer, or properly disposed of at the customer's expense. The immersion

cleaner drums are never opened at the service center so additional verification is not possible until it reaches the recycle center.

2.2.2 Dry Cleaning Collection Service

The dry cleaning wastes are collected from facilities where one process is managed and the possibility of cross-contamination from other chemicals or wastes is minimal. The contents of the drums are verified by the sales representative when he services the customer and, comparable to the handling of immersion cleaner, the drums are not reopened until they reach the recycle center.

2.3 WASTE ANALYSES AT THE RECYCLE CENTER

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. The following tables in Appendix D summarize a typical waste analysis plan practiced at the recycle center for the hazardous materials returned from the service center:

Table D-1	Parameters and Rationale for Hazardous Waste Selection
Table D-2	Parameters and Test Methods
Table D-3	Methods Used to Sample Hazardous Wastes
Table D-4	Frequency of Analysis

2.4 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change.

Revision of the plan is the responsibility of the Environment, Health and Safety Department at Safety-Kleen's Corporate Office in Elgin, Illinois.

2.5 LAND BAN NOTIFICATION/CERTIFICATION FORMS

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

1. Printing the Notice language on manifests-such as for core-business customers to branch shipments; or
2. Special forms for each regularly handled waste types (e.g., MS, IC, perc, freon); or
3. A general form that must be completed for unique or non-standard waste streams.

The notice is required paperwork for F001-F005 waste types. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the notice is kept in the files of the receiving facility with the manifest or with the pre-print if a manifest is not used.

PREPAREDNESS AND PREVENTION PLAN

ABSTRACT

SECURITY MEASURES--The site is secured as follows:

- a. There is a chain link fence with three strands of barbed wire around the facility.
- b. Warning signs are posted at all entrances.
- c. Locks are on all entrances to the warehouse.
- d. Remote controls for all tank operations are inside the warehouse.
- e. There is twenty-four hour outdoor lighting.

INSPECTION PROCEDURES: See Appendix E for a copy of the Facility Inspection Record and Procedure.

REQUIRED EQUIPMENT--The emergency equipment requirement is met with the following:

- a. Internal communications will be by voice.
- b. Telephones are available in the warehouse.
- c. Fire extinguishers are available next to three exits in the warehouse.
- d. Water is available from the city of Farmington.

3.0 PREPAREDNESS AND PREVENTION PLAN

3.1 SECURITY MEASURES

The facility is secured with a six-foot high chain link fence topped by three strands of barbed wire. All access gates are locked when the facility is unoccupied and warning signs placed fifty feet on all sides of the fence stating "Danger - Unauthorized Personnel Keep Out" which are visible from twenty-five feet are posted at the entrances. In addition, outdoor lights remain on at all times.

The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas.

The tanks are inaccessible in that material can not be added to or removed from them without activating the pumps, the controls for which are inside the warehouse. The pumps are not activated unless mineral spirits product or waste is being added to or removed from the tanks by Safety-Kleen personnel. In addition, warning signs are posted on the return and fill station.

3.2 INSPECTION PROCEDURES

The branch (i.e., service center) manager or his designate is responsible for carrying out and documenting the facility inspection

(Appendix E) on a daily basis. He must note any repairs that are needed and assure that they are completed. If he can not carry out the repairs himself, he must notify the Technical Services Department at Safety-Kleen's corporate headquarters and request assistance. Completion of repairs must also be noted on the Facility Inspection Record.

The regional manager is the supervisor of several branch managers in a geographic area. He must review the Facility Inspection Record on a quarterly basis to insure that they are properly completed and that any necessary repairs have been effected.

The facility inspection includes the following:

- a. Tank inspections--At a minimum, the tanks holding the solvent product and spent solvent are inspected daily. The inspections include checks of the high level alarm and of the volume held in the tank. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. When the tank used to store spent solvent is 85% full, a pickup must be scheduled with the Solvent Control Department in Safety-Kleen's corporate headquarters. The solvent must not exceed 95% of the tank volume at any time.

The secondary containment for the tanks must be checked for cracks or other deterioration. Any damage to tanks (such as

rust or loose fixtures) or secondary containment must be noted and repairs initiated.

- b. Solvent dispensing equipment--The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks or leaks) and proper functioning. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired.
- c. Drum storage areas--The drum storage area is inspected daily and the number and condition of the drums noted. The total volume of the spent solvent held in the drum storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect drums must be placed in a drum of adequate integrity. Finally, the drums must be properly labeled and marked in accordance with U.S. DOT and New Mexico hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, they must be repaired immediately.
- d. Route vehicles--Each route vehicle must be inspected daily to insure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment must be on board: sorbents, fire

extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses. Any missing equipment must be replaced.

- e. Dumpsters--The wet dumpster (in the return and fill station) must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster. The dry (trash) dumpster must be inspected to insure that no liquids are being placed in it.
- f. Safety equipment--The fire extinguishers must be checked to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed and the first aid kit and sorbents must be inspected for adequate content and accessibility. A list of required emergency equipment is in Appendix E.
- g. Security--The operation of each gate and lock must be checked daily. In addition, the fence must be inspected for deterioration on a weekly basis.

3.3 FACILITY DESIGN

The Farmington service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents which may

occur. Specifications for the storage facilities, secondary containment and other equipment are in Appendix E and descriptions follow.

3.3.1 Tank Storage

The 12,000 gallon storage tank is 10'6" in diameter and 19' high. It is constructed of 3/16" thick (1/4" thick in the lower third of the tank) carbon steel painted white to reflect sunlight. The tanks are constructed in accordance with Underwriters Laboratories Standard 142 and they are located more than 15 feet from the property line, in accordance with National Fire Protection buffer zone requirements. The secondary containment for the tanks consists of a monolithically poured slab and concrete block dike wall. The slab is six and the wall is eight inch thick.

The tank is equipped with an aural (siren) and visual (strobe light) high level alarm system which will alert employees when the tank is approximately 600 gallons from being full.

The return and fill station is a concrete block structure and the secondary containment is monolithically poured concrete. The dumpsters are tight-piped to the tank and all piping is aboveground.

3.3.2 Drum Storage

The slab, curbing and collection trenches for the drum storage area in the warehouse are made of steel-reinforced concrete and the concrete has

been poured so that no cracks or gaps exist between them. The curbing is four inches high and six inches wide and encompasses the storage area except where there is a trench. Steel grates cover the trench to facilitate the movement of drums across it. The concrete is coated with chemical-resistant epoxy and urethane so as to be impermeable to contain leaks and spills.

The immersion cleaner and dry cleaning wastes are compatible with the drums in which they are stored; in fact, mineral spirits is sometimes used as a rust-preventive coating for steel. Dry cleaning wastes are stored in black polyethylene and blue steel drums, both of which are DOT-approved containers. The drums have been treated with fluorine gas to be resistant to dry cleaning solvents and they will be palletized whenever possible (nine 16-gallon drums per pallet) to facilitate shipping.

3.4 PLANT OPERATIONS--POTENTIAL SPILL AND FIRE SOURCES AND CONTROL PROCEDURES

Employees must perform their duties in the safest, most efficient manner possible and the service center has been equipped to facilitate these activities. Drums will be moved using a handcart and pallets using a forklift or pallet jack. A hoist is available at the branch to assist in the lifting of heavy items. Upon arrival at the service center, containers of spent solvent must immediately be added to the storage tank or placed in the drum storage areas. Open drums of solvent must not be left unattended. Below are descriptions of situations which can result in accidents and the precautions taken to prevent their occurrences.

3.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

- a. Pouring of drummed solvent into the dumpster--As the 16- and 30-gallon drums are poured into the dumpster, solvent can splash out. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by a pan with a floor drain that empties into the storage tank. This design will contain this type of spill.
- b. Filling of drums with solvent product--A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with solvent. Leaking fittings, a damaged hose or carelessness could lead to the discharge of solvent outside of the drum. Manual emergency shut-off valves are on each hose, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.
- c. Moving of containers--When a container is moved, a potential exists for it to tip over. To minimize the potential for spillage of solvent, all containers must be maintained in an

upright position and remain tightly covered while in storage or in transit.

- d. Delivery truck transfers--The cargo should be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary.

If a spill does occur, the amount of solvent in the containers is a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results will be removed manually, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

3.4.2 Potential Major Spill Sources

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

- a. Overfilling of storage tanks--Both product and spent solvent tanks can be overfilled with a resulting discharge of solvent. A high level alarm and daily checks of tank volumes will prevent this type of incident.
- b. Leaking pipelines--The pipelines and other equipment present a potential for leaks and resultant pollution. Regular

inspection of this equipment and the solvent inventory will detect any leaks.

3.4.3 Potential Fire Sources

The following is a list of fire prevention and minimization measures:

- a. All wastes and products are kept away from ignitable sources--
Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., the office or locker room). The mineral spirits handling area and the aboveground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.
- b. Ignitable wastes are handled so that they do not:
 1. become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The mineral spirits waste is stored in a tank or in drums, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the drums kept at room temperature to minimize the potential for pressure build up.
 2. produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health--The vapor

pressure of mineral spirits is low (2 mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization will be minimal under normal working conditions.

3. produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See 'a' above and 'c' below.
 4. damage the structural integrity of the Safety-Kleen facility--The mineral spirits will not cause deterioration of the tank, drums or other structural components of the facility.
- c. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.
 - d. "No Smoking" signs are posted in areas where solvents are handled or stored.
 - e. Fire extinguishers must be checked once per month and tested by the fire extinguisher company once per year.

3.4.4 Tank Evaluation and Repair Plan

The product stored in the tanks at this facility is mineral spirits which is compatible with the carbon steel structure; in fact, mineral spirits is often used as a light hydrocarbon coating to prevent rusting of metal parts.

If corrosion is noted, it will be removed and the tank repaired. If corrosion is significant and localized, the tank will be immediately taken out of service and repaired, (e.g., a patch welded over the corroded area). Should the corrosion of the vessel be extensive or if the tank is found to be leaking, the vessel will be immediately taken out of service and replaced. In the case of a tank which leaks outside of the dike, the facility's contingency plan will be initiated to insure the removal of any contaminated soil.

3.4.5 External Factors

The design of the installation is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside. Also, the drum storage areas are in buildings which are inaccessible to unauthorized personnel.

- a. Vandalism - Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.

- b. Strikes - A strike would not result in a solvent spill or fire.
- c. Power failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.
- d. Flooding - The site elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.
- e. Storms or Cold Weather - The solvent return and fill station is roofed to eliminate the possibility of rain or snow entering the dumpsters. No opportunity is foreseen to affect the facility with snow, cold weather or storm water.

3.5 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS

Internal communication within the building and the solvent return/fill area is accomplished by voice. Telephones will be used to report a spill or a fire and to summon assistance from local and state emergency response agencies. Branch managers have emergency phone numbers of local and state emergency response teams posted by each phone located in the sales office. Included in these phone numbers is the 24-hour telephone number which can be used to contact the Environment, Health and Safety Department.

CONTINGENCY PLAN

ABSTRACT

PURPOSE: This plan describes the proper action to be taken by employees during an emergency.

RESPONSIBILITIES: The emergency coordinator or his alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR: The branch manager is the emergency coordinator.
The alternate emergency coordinator is the Albuquerque manager.

EMERGENCY NOTIFICATIONS:

Farmington Police Department	505/327-0222
Farmington Fire Department	505/325-3501
San Juan County Regional Medical Center	505/325-5011
Environment, Health and Safety Department	708/888-4660
New Mexico Health and Environment Dept.	505/827-9329
Rinchem	505/345-3655

4.0 CONTINGENCY PLAN

Safety-Kleen Corp. (2-004-01)
4200 A Hawkins Rd.
Farmington, New Mexico 87401

4.1 PURPOSE

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or ground water.

The contingency plan is to be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment, implementing the procedures contained in this plan.

4.2 EMERGENCY COORDINATOR RESPONSIBILITIES

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or his alternate be unavailable. The branch manager is the emergency coordinator and the Albuquerque branch manager is the alternate emergency coordinator.

The emergency coordinator and his alternate must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, 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 Appendix F. Also listed in Appendix F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation.

4.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his alternate when the emergency coordinator is not available) must immediately:

- a. activate the internal facility communication system to notify all facility personnel;
- b. notify Safety-Kleen's Environment, Health and Safety Department using the 24-hour telephone number after working hours - 708/888-4660; and
- c. notify appropriate state or local agencies with designated response roles, if necessary.

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. If necessary, outside laboratories may be contacted to perform chemical analysis.

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).

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 must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

4.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Environment, Health and Safety Department to

report the incident. The treatment, storage and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and
- b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

4.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

- a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.
- b. The coordinator must immediately notify the Environment, Health and Safety Department. The department will report the incident

to the New Mexico Health and Environment Department (HED),
including the:

- (1) name and telephone number of notifier;
- (2) name and address of facility;
- (3) time and type of incident (e.g., release, fire);
- (4) name and quantity of material(s) involved, to the extent known;
- (5) the extent of injuries, if any; and
- (6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with section 4.2.2 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 15 days of the incident, Safety-Kleen will submit a written report on the incident to the New Mexico HED. The report must include:

- 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.

4.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

- a. The person who discovers/causes the spill reports to the emergency coordinator.
- b. The emergency coordinator contacts the Environment, Health and Safety Dept.
- c. The Environment, Health and Safety Department reports to the New Mexico HED.

4.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

<u>Agency or Authority</u>	<u>Rationale</u>
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
New Mexico HED	Report releases and fires.
Rinchem	Call to assist with remedial action after a release.

Arrangements have been made to 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 have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. Copies of the letters to the local police department, fire department and hospital are in Appendix F.

4.3 EMERGENCY RESPONSE PROCEDURES

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

4.3.1 Minor Spills

If a spill should occur while pouring spent solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. 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 a paved area, it must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to the 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 Safety-Kleen recycle center for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of

ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. Then, following the instructions of the appropriate Material Safety Data Sheet (Appendix F), the worker will enter the area wearing rubber gloves, aprons, safety glasses, and/or a respirator, collect the liquid, drum it and return it 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 Environment, Health and Safety Department and the department will contact the New Mexico HED, if required.

4.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material which escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

- a. Assist any injured people.
- b. Stop the flow of solvent, if possible.
- c. Retain, contain or slow the flow of the solvent if it can not be stopped.

- d. If solvent escapes your containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Environment, Health and Safety Department.
- 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 Environment, Health and Safety Department using the 24-hour telephone number: 708/888-4660. If the Environment, Health and Safety Department does not respond within thirty minutes, the emergency coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and New Mexico HED (telephone: 505/827-9329 - 24 hour number). Otherwise, the Environment, Health and Safety Department will contact the proper authorities.

The person reporting a spill should be prepared to give his name, position, company name, address and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed.

Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Every spill must be recorded on the Spill Report Telephone Log (Appendix F) and reviewed with branch personnel to prevent similar spills from occurring in the future. A copy of this report is sent to the Environment, Health and Safety Department.

4.3.3 Fire Control Procedures

If a fire occurs, personnel must act quickly with the fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately, evacuate the facility and call the fire department.

Vapors of mineral spirits exposed to a spark or open flame can flash at temperatures over 105° F. A mineral spirits fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

Immersion cleaner (which is a mixture of chlorinated solvents, cresylic acid and an alkaline solution), and dry cleaning wastes are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (about 1200° F). The potential for the materials reaching a decomposition state is minimal; however, branch personnel and local

authorities must be aware of the proper response, should a fire affect the drum storage areas:

- a. Isolate the hazard area and deny entry to unauthorized personnel.
- b. Stay upwind; keep out of low areas.
- c. Ventilate closed spaces before entering them.
- d. Wear positive pressure breathing apparatus and protective clothing.
- e. Evacuate a 600 foot radius area endangered by the gas.

A fire in the drum storage area can best be extinguished by foam, water fog, or water spray.

4.4 EVACUATION PLAN

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Hawkins Road to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

4.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

An emergency response contractor is identified on the Emergency Information sheet (Appendix F). This contractor will provide emergency assistance during a release and/or cleanup.

4.6 POLLUTION INCIDENT HISTORY

There are no records of a pollution incident having occurred at this facility.

4.7 IMPLEMENTATION SCHEDULE

Any discrepancies or deficiencies found during the routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The branch manager has the overall responsibility for remediating any discrepancies found during the routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

4.8 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 local authorities and organizations listed on

the Emergency Information sheet (Appendix F) and 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 is reviewed and updated, if necessary, whenever:

- a. the facility license is modified to allow new process 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; or
- f. the plan fails when implemented in an emergency.

PERSONNEL TRAINING

ABSTRACT

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems.

TIME OF TRAINING

JOB TITLE	Prior to Starting Work	On the Job	Annually	When Regulations and/or Procedures Change
Branch Manager	X		X	X
Branch Secretary		X	X	X
Sales Representative	X	X	X	X
Warehouseman		X	X	X

5.0 PERSONNEL TRAINING

5.1 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to his job assignment. New branch managers must complete an introductory training program before starting their jobs, with annual review and update thereafter. Appendix G contains information on service center personnel and trainers, job descriptions, training outlines and training record forms.

5.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

Environmental compliance and training of branch employees is the responsibility of the branch manager. The Environment, Health and Safety Department, in turn, provides a training program to be executed annually. Job descriptions for branch personnel are in Appendix G.

5.2.1 Branch Manager

The branch manager is ultimately responsible for the operations at the service center. The sales representatives, secretary and warehouseman report to the branch manager and he, in turn, must provide the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the branch manager must:

- a. keep the service center clean and orderly;

- b. execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;
- c. know the potential hazards of the material and wastes handled on site;
- d. identify potential spill and fire sources and be able to execute the contingency plan;
- e. inform all employees of their environmental responsibilities;
- f. act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office; and
- g. maintain all environmental records (such as manifests, training records and spill reports) on file.

5.2.2 Environment, Health and Safety Department

Safety-Kleen's Environment, Health and Safety (EHS) Department operates out of the corporate office in Elgin, Illinois. Each regional environmental engineer who works in this department is responsible for compliance of the service centers in a given geographic area of the country. The EHS Department must:

- a. provide a training program which addresses the requirements of environmental regulations and corporate policy;

- b. notify the proper authorities, oversee remedial actions and submit a written report to the state after an emergency situation has occurred;
- c. assure that environmental permits are submitted and updated as required; and
- d. manage any environmental compliance issues which exceed the resources available at the service center level.

5.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training is accomplished using classroom, videotape, written and on-the-job methods. The EHS Department prepares a training program for employees and they must provide documentation that the program has been executed.

An employee is trained prior to starting or as soon as he or she begins working, (depending on his or her position), and annually thereafter. Training program outlines are in Appendix G.

5.3.1 Training of New Branch Managers

New managers are trained for several weeks before they begin their new positions. This training is both in situ and classroom modes. While being trained at a designated "training facility", a new manager reviews all

environmental records and learns the recordkeeping requirements. These records include: manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates in four weeks of training at his new facility, at least one day of which is devoted to environmental training with his regional environmental engineer. At least eight hours consists of an introduction to environmental law and a review of the Part B, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. This training is outlined in Appendix G.

Additional time is spent reviewing past environmental compliance at the branch manager's facility and regulations unique to his state are discussed as well.

5.3.2 Training of New Branch Secretaries

Branch secretaries are trained in the proper recordkeeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the branch manager and is done within six months of starting. It includes the items listed in the Introductory and Annual Training Topics for Branch Employees (Appendix G) which are explained in company-produced videotape presentations on emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues. In addition, the contingency

plan must be reviewed with the branch manager within the first two weeks of the secretary starting work.

5.3.3 Training of New Sales Representatives

New sales representatives are trained in situ for two weeks during which they are introduced to manifests, facility inspection records and training records. A sales representative may also be trained as the designate for performing the facility inspection. Additional training is in the form of videotape presentations and a review of the contingency plan. The contingency plan must be reviewed with the branch manager before the sales representative formally begins his new position and annually thereafter. All items listed in the Introductory and Annual Topics Training for Branch Employees (Appendix G) must be explained within six months of starting.

5.3.4 Training of New Warehousemen

A warehouseman is trained to maintain the service center and assist the other branch employees in their tasks. He may be a designate for the facility inspection and must be trained by the branch manager as such. Within two weeks of the warehouseman's starting, the branch manager must review the contingency plan with him, and within six months he must review the items listed in the Introductory and Annual Training Topics for Branch Employees (Appendix G).

5.3.5 Annual Training

On an annual basis, employees are trained using a program prepared and updated annually by the EHS Department. It includes updates on environmental regulations, an in-depth review of the contingency plan and a review of RCRA inspection criteria.

All service center employees must annually review the items listed in the Introductory and Annual Topics for Branch Employees. This review is in the form of videotapes and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental regulations are issued by the EHS Department and must be read and discussed by all branch personnel.

5.4 TRAINING RECORDS

All training must be documented using the record forms in Appendix G. The records must be kept on file at the facility until closure.

CLOSURE PLAN

ABSTRACT

LOCATION ADDRESS: Safety-Kleen Corp. (7-008-21)
4200 A Hawkins Road
Farmington, New Mexico 87401

U.S. EPA I.D. NO: NMD 980698849

WASTE UNITS TO UNDERGO CLOSURE:

- a. Tank Storage - one 12,000 gallon aboveground storage tank
- b. Drum Storage - an area of about 187 square feet with a storage capacity of 4,464 gallons.
- c. Return and Fill Station - The location of this waste management unit is shown in the Site Plan. It can hold 375 gallons of waste.

The volumes shown above are the maximum inventories.

6.0 CLOSURE PLAN

6.1 PURPOSE

The Farmington service center operates as a storage facility for hazardous wastes, and Safety-Kleen believes it is required that it be closed in accordance with the closure requirements of New Mexico HWMR 206.C. Closure of the facility will be carried out in accordance with the steps outlined in this plan and Appendix H contains an estimated schedule and cost for the completion of closure. Safety-Kleen will remove all hazardous wastes and residuals from the facility and will therefore eliminate the need for further maintenance and care. The expected year of closure for this facility is 2020.

6.2 ABOVEGROUND TANK AND ASSOCIATED PIPING

To safely clean and decommission the aboveground storage tank:

- a. Remove the remaining material from the tank and return the materials to the Recycle Center for reclamation.
- b. Provide access to the tank.
- c. Rinse, scrape and squeegee the tank interior, removing all residual waste material and rinsate.

- d. Disconnect and decontaminate all appurtenant piping and pumping equipment.
- e. Remove tank and appurtenant equipment and reuse or sell as scrap.
- f. Clean and raze the diking and slab.
- g. Backfill all excavations with clean fill materials.
- h. Transport and dispose of all waste material generated during the project.

6.2.1 Removal of Waste Material and Opening of the Tank

The contents of the tank must be removed using a pump, vacuum or similar equipment and then be shipped by tanker truck to a reclaimer.

To gain access to aboveground tanks, use the manway at the top of the tank. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Prior to entering the tank, personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they must be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

6.2.2 Removal of Residual Waste and Cleaning of Tank

Before removing any residual waste from the tank, all piping and appurtenant equipment will be flushed with clean mineral spirits followed by a detergent solution.

The method used to remove the residual waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see section 6.2.1).

Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high pressure wash system using clean solvent and a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be shipped to a reclaimer. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures:

- a. Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.

- b. Supply valves must be closed and tagged and bleeder valves left open; or supply piping should be disconnected.
- c. Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "Off".
- d. On tanks where flammable vapors may be present, all sources of ignition must be removed.
- e. Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test". In all tank entering situations, an oxygen deficiency test shall also be performed prior to tank entry. Both flash test and oxygen deficiency test will be performed by the supervisor of the area in which the work is being done.
- f. Under conditions where there exists a possibility (no matter how remote) of toxic vapors being present in the tank to be entered, the supervisor will arrange to have the air tested. The results of all tests will be displayed on site.
- g. There must be a set of wristlets or a rescue harness and sufficient rope at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.

- h. Workers should wear rescue harnesses if entering a tank with a large enough opening to easily affect a rescue. In tanks with small openings, only wristlets may be used. In cases where there are agitator shafts, drums or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the lifeline may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- i. A constant source of fresh air must be provided to insure a complete change of air every few minutes. In cases of short term entry for inspection or removal of objects, an air mask is recommended. In cases of long term entry the use of an air mover should be considered.
- j. When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.
- k. Adequate illumination must be provided and a flashlight or other battery operated light must also be on hand to provide illumination for a safe exit in the event of an electrical power failure.

1. All electrical equipment to be used inside the tank must be in good repair and grounded.
- m. Other people working in the immediate area will be informed of the work being done, and they must inform the watcher or supervisor immediately of any unusual occurrence which makes it necessary to evacuate the tank.
- n. The Watcher or Standby Observer System must be implemented. It consists of the following:
 - (1). Workers inside a confined space must be under the constant observation of a fully instructed watcher.
 - (2). Before anyone enters the tank, the watcher will be instructed by the person in charge of the entry that an entry authorization must be obtained from the person in charge and a rescue harness or wristlets must be used on the job.
 - (3). The watcher must also know the location of the nearest telephone (with emergency numbers posted), eyewash and/or shower, fire extinguisher and oxygen inhalator. For all "hot work" inside a tank, the watcher must be instructed how to shut down the welding/burning equipment.

(4). As long as anyone is inside the vessel, the watcher must remain in continuous contact with the worker. HE IS NOT TO LEAVE THE JOB SITE EXCEPT TO REPORT AN EMERGENCY. He does not enter the tank until help is available.

(5). After being instructed in his responsibilities, the watcher will sign a form indicating his understanding.

- o. All welding and burning equipment must be provided with a shutoff under the control of the watcher; and the watcher must be shown how to shut off the equipment if it becomes necessary. Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
- p. For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site and standard welding and burning safety precautions will always be followed.

6.2.3 Removal of the Tank

To safely remove the tank :

- a. Disconnect all appurtenant piping.
- b. Disconnect all appurtenant pumping equipment.

- c. The vessels shall be removed and reused or cut up and sold as scrap.
- d. Raze the diking and slab and inspect the excavation. Examine soils using a photoionization detector. If contamination is indicated, confirm with laboratory analyses, determine the extent of contamination with a soil study and overexcavate soils down to clean soils.
- e. Backfill the excavation with clean fill materials and grade to ground level.

6.3' DRUM STORAGE AREA IN WAREHOUSE

The drum storage area is used for the storage of drums of used immersion cleaner and dry cleaning waste. At closure, all the drums will be removed and transported to a reclaimer after proper packaging, labeling and manifesting. The contents of the drums will be reclaimed and the drums will be cleaned for reuse.

The concrete floor and spill containment sumps will be cleaned with a detergent solution and the cleaned area will be inspected, using a photoionization detector, to determine the completeness of the cleaning. Any other wastes generated in the closure process will be reclaimed or properly disposed of.

6.4 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used mineral spirits to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, the sediment in the dumpsters will be removed and drummed, labeled, and manifested and then shipped to a reclaimer.

The dumpster and the dock area will be thoroughly rinsed with a detergent solution. The rinsate is discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described earlier. The clean dumpster and dock structure will be reused by Safety-Kleen or scrapped.

6.5 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Mexico Health and Environment Dept. may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

- a. the facility has the capacity to receive additional wastes;

- b. there is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or
- c. closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

When closure is completed, Safety-Kleen shall submit to the New Mexico Health and Environment Dept. certification, both by the operator and by an independent registered professional engineer, that the facility has been closed in accordance with the approved closure plan.

PERSONNEL RECORD

Facility Location: _____
Facility Number: _____
E.P.A. I.D. Number: _____

E.P.A. I.D. Number: _____

Employee Name:	Position:*	Start Date:	Termination Date:
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[illegible]

* Use only the following job titles: Accumulation Center Manager, Accumulation Center Driver, Branch Manager, Branch Facility Manager, Branch Secretary, Sales Representative and Warehouseman. Branch Automotive Managers, Industrial Managers, etc., should be listed as Sales Representatives for the purpose of environmental permits.

JOB DESCRIPTIONS

BRANCH MANAGER

JOB DESCRIPTION

The Branch Manager has overall responsibility for the facility operations and maintenance, and directs sales activities within a certain geographic area defined by the Corporate Marketing Department. He is responsible for the proper operations and profitability of the service center.

REPORTS TO:

Regional Manager of Sales

QUALIFICATION:

Minimum high school graduate with Safety-Kleen sales experience.

PRINCIPAL RESPONSIBILITIES:

1. Plan, direct, and monitor activities of Sales Representatives.
2. Training of branch facility managers, sales representatives, and other branch personnel.
3. Assist or accompany sales representatives during their sales activities when necessary.
4. Tabulate daily sales and inventory figures and report them to the corporate offices.
5. Maintain adequate inventory of solvents, allied products, and equipment.
6. Carry out corporate policies and standards regarding facilities, equipment operation and maintenance.
7. Insure the regular inspection of the facility and equipment, and the implementation of any necessary repairs or remedial actions.
8. Represent Safety-Kleen Corp. in local community affairs and public relation activities.
9. Coordinate with corporate Technical Services and Environment, Health, and Safety Departments and implement necessary actions or plans for regulatory compliance.
10. Be able to act as the primary emergency response coordinator.

BRANCH SECRETARY

JOB DESCRIPTION

Performs duties to assist the branch manager, sales representatives, and customers with billing, scheduling and recordkeeping. Performs secretarial duties at the branch.

REPORTS TO:

Branch Manager

QUALIFICATION:

Attended high school

PRINCIPAL RESPONSIBILITIES:

1. Maintain records in an orderly manner.
2. Assist sales representatives in scheduling services.
3. Insure that all hazardous waste manifests are complete, and manage distribution and filing of copies.
4. Maintain Personnel Training Record files.
5. Maintain Facility Inspection Records.
6. Answer customer inquiries.
7. Manage customer billing.
8. Perform other related duties as assigned.

SALES REPRESENTATIVE

JOB DESCRIPTION

The Sales Representative is charged with the responsibility of generating new business and servicing established accounts within a certain defined geographic area.

REPORTS TO:

Branch Manager

QUALIFICATION:

Minimum high school graduate

PRINCIPAL RESPONSIBILITIES:

1. Maintain his route truck and replenish his products on the truck before beginning his route sales.
2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
3. Exchange used solvents with fresh solvent and replenish the inventory of Safety-Kleen's products for existing customers.
4. Make minor repairs of Safety-Kleen's parts washer equipment or lease new equipment to the customer.
5. Prepare the necessary paper work for each service, and bill or credit the customer, as necessary.
6. At the end of each day, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the branch manager can tabulate the daily figures and forward them to the corporate office.

WAREHOUSEMAN

JOB DESCRIPTION

Performs duties to assist the sales representatives in loading and unloading the trucks. Performs janitorial duties at the warehouse.

REPORTS TO:

Branch Manager

QUALIFICATION:

Attended high school.

PRINCIPAL RESPONSIBILITIES:

1. Maintain warehouse in clean and orderly manner.
2. Assist sales representatives in loading trucks and replacing solvent.
3. Refurbish drums as needed.
4. Park or move trucks as needed.
5. Stock inventory.
6. Replenish trucks with inventory.
7. Perform other related duties as assigned.

RESUME

RICHARD PEOPLES

Position: Environmental Manager, Service Centers
Safety-Kleen Corp.

Education: M.A., Zoology, Indiana University ('69)
B.A., Zoology, Indiana University ('72)

Employment Experience:

Environmental Manager, Service Center
Safety-Kleen Corp.
Elgin, Illinois (1988-Present)

Environmental Scientist, Regional Manager -
Superfund Contract, Black & Veatch Consultants
Kansas City, MO (1987-1988)

Assistant Director of Utilities
City of Bloomington Utilities, Bloomington, Indiana
(1972-1987)

Additional Training:

Branch Facility Manager Trainer (1989)

Certified Hazardous Materials Manager Training - Master Level
(1986)

RESUME

THOMAS R. HEATON

Position: Regional Environmental Engineer - New England
Environment, Health and Safety Department - Safety-Kleen Corp.

Education: M.S., Department of Technology & Human Affairs, Sever
Institute of Technology, Washington University, St.
Louis, MO (1978).

B.S., Zoology & Environmental Affairs, Butler University,
Indianapolis, IN (1976).

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(1986 - Present)

Senior Environmental Specialist, Borden Inc., Columbus, OH, Nov.
(1980 - Sept. 1986)

Environmental Scientist, Ohio Environmental Protection Agency,
Nov. (1978 - Nov. 1980)

Additional Training:

Massachusetts Environmental Issues Workshop, Associated Industries
of Massachusetts,
Worcester, MA (1989)

Underground Storage Tank Management, Ohio Petroleum Council,
Worthington, OH (1986)

Groundwater Contamination Seminar, Center for Energy and
Environmental Management (CEEM), Schaumburg, IL (1984)

RESUME

PAUL D. PEDERSON

Position: Regional Environmental Engineer - Great Lakes
Safety-Kleen Corp.

Education: Bachelors of Chemical Engineering, University of Minnesota (1983)

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(July, 1986 - Present)

Application Engineer
Dale Electronics
(1983 - 1986)

Additional Training:

SARA Emergency Planning Workshop;
Pannell, Kerr, Forster
(October, 1987)

Fundamentals of Groundwater Contamination;
Geraghty and Miller
(March, 1987)

RESUME

JAY LANAHAN

Position: Regional Environmental Engineer - South Central
Safety-Kleen Corp.

Education: M.S. Industrial Microbiology, Univ. of Houston (1987)
B.S. Marine Biology, Texas A & M Univ. (1981)

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(August, 1988 - present)

Mgr. Technical Affairs
Evans Cooperage Company
(May, 1987- July, 1988)

Hazardous Waste Specialist
Texas Water Commission
(April, 1984 - May, 1987)

Additional Training:

Registered Public Health Sanitarian - State of Texas

Oil Spill Control Course -
Texas A & M University Engineering Extension (1985)

RESUME

IVETTE SANTANA

Position: Regional Environmental Engineer - New York and New Jersey
Safety-Kleen Corp.

Education: M.S. Environmental Science, New Jersey Institute of Technology
(1989-present)

B.S. Biology, College of Saint Elizabeth, Convent Station, NJ
(1985)

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(Jan., 1989 - Present)

Compliance Officer
Solvent Recovery Services
(1987 - 1989)

Approvals Manager
Kramer Environmental
(1985 - 1986)

Research Assistant
Method Development-HPLC
Intech Biolabs
(1984 - 1985)

Additional Training:

Right-To-Know Seminar - 1989

Hazmat-Environmental Compliance Seminar - 1986

Professional Supervising - 1986

RESUME

JEFFREY E. SIMPSON

Position: Regional Environmental Engineer - West Central
Safety-Kleen Corp.

Education: B.S. Engineering and Public Policy (B.S. EPP)
Washington University, St. Louis, Missouri (May, 1980)

Employment Experience:

Environmental Engineer
Safety-Kleen Corp., May, 1980 - Present

Employed as an Environmental Engineer with responsibility for handling Environmental Affairs in 8 states. Includes training of employees, preparation of contingency plans and regulatory affairs.

Additional Training:

Conducted training of Regional Managers, August, 1986

Hazardous Waste Incineration Today, sponsored by Georgia
Institute of Technology, February 13-14, 1986

1984 Hazardous Material Spills Conference, sponsored by
Association of American Railroads/Bureau of Explosives,
Chemical Manufacturers Association, U.S. Coast Guard, U.S. EPA,
April 9-12, 1984

RESUME

ROBERT WACHSMUTH

Position: Regional Environmental Engineer - Western Region
Safety-Kleen Corp.

Education: B.S. Civil Environmental Engineering,
Michigan Technological University (1976)

Employment Experience:

Environmental Engineer,
Safety-Kleen Corp., January 18, 1982 - Present

Senior Environmental Engineer, Ecology and Environment
June 1, 1980 - January 15, 1982

Project Engineer, Aquatechnics, Inc.
September, 1978 - June, 1980

Project Engineer, RJN Environmental Associates, Inc.
March, 1978 - September, 1978

Designer, Illinois Central Gulf Railroad
November, 1976 - March, 1978

Junior Engineer, Dames & Moore
April, 1976 - November, 1976

Training Experience:

Underground Tank Storage of Hazardous Materials
Sacramento, California in August, 1984

NEW BRANCH MANAGER TRAINING

Program for Regional Environmental Engineer branch visit -

1. Review of Part B Permit
 - Part A Application
 - Waste Analysis Plan
 - Preparedness and Prevention Plan
 - Contingency Plan
 - Training Plan
 - Closure Plan and Financial Requirements
2. Review of Transportation Licensing
3. Review of Environmental Compliance Guidance and Corporate Policy Manual
4. Conduct Detailed Facility Inspection with Branch Manager
 - Identify deficiencies requiring branch attention
 - Identify problems requiring Technical Services assistance
 - Review actual vs. permitted waste storage capacities
5. File Review
 - Manifests and Land Ban Notices
 - Training Files
 - Spill Report File
 - Community Right-to-Know Files
 - Inspection Records
 - Operating Log
6. Contingency Plan Training Session with Branch Manager and All Alternate Emergency Coordinators
 - Include Spill Simulation and Response
 - Update the Emergency Information and Local Authority Notifications
7. Health and Safety
 - OSHA 200 Reporting
 - Hazard Communication Program
8. Review Branch Specific Manifesting Procedures and Customer ID # Compliance
9. Review of Past Agency Inspections and Other Past Branch Compliance-related Issues
10. Environmental Training for Branch Personnel
 - Requirements for Content and Frequency
 - Conducting Training Sessions
 - Recordkeeping

Notes to Regional Engineers:

- Be prepared with examples and extra copies of all forms in case the branch is missing them.
- Spend time at the beginning of visit reviewing Environmental files for potential missing information or problems.
- Use several short quizzes covering the major topics as a review and documentation of the training session. A training record form should also be completed.
- Provide copies of your recent memos concerning environmental compliance at the branch or in the state. Branch copies may be missing.
- Provide Safety-Kleen part numbers for equipment (sorbents, signs, etc.) that may be missing at the branch.

**INTRODUCTORY AND
ANNUAL TRAINING TOPICS FOR BRANCH EMPLOYEES**

- A. Environmental Regulation Update
- B. Part A Application
- C. Waste Analysis Plan
- D. Preparedness and Prevention Plan
- E. Contingency Plan and Emergency Procedure
- F. Training
- G. Closure
- H. Inspections
- I. Manifesting
- J. Spill Simulation and Spill Reports

Note: Employees may not work in unsupervised positions until they have received emergency response training (Items E and J). Employees must be completely trained, in all the items listed above, within six months of starting and annually thereafter.

EHs TRAINING TOPIC LOG

Employee Name and No.: _____

Branch Location and No. _____

Date Hired: _____ Position: _____

Note: Employees may not work in unsupervised positions until they have received emergency response training. Employees must be completely trained, in all the items listed above, within six months of starting and annually thereafter.

Certification by the employee that training has been received obligates the employee to discharge his duties in accordance with the training provided. Failure to comply with the requirements established during the training program may result in civil or criminal penalties against the employee.

	<u>TRAINING TOPIC*</u>	<u>DATE COMPLETED</u>	<u>SIGNATURE</u>
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____

* The training topic and training method should be described thoroughly. For example: "Safety Training Part III - Preventing Injuries and Illnesses (Videotape)", "Respirator Fit Testing and Training (written weekly training topic)", "Contingency Plan in Part B (reviewed with regional environmental engineer)", etc.

FARMINGTON, NEW MEXICO FACILITY
CLOSURE COST ESTIMATE

1. Tank Closure - Open, remove contents of, clean, remove, and dispose of a 12,000-gallon aboveground storage tank.

Phase I - Remove Contents and Clean

1. Ship contents to a reclaimer.

Crew:	
2 Truck Dr. \$17.56/hr. x 8 hrs. -	\$ 281.28
2 Trucks \$500 lump sum	500.00
Tank size - 12,000 gal. - 7,500 gal/truck = 2 trucks	
2 trucks x 300 miles x 1.75/mile -	1,050.00
Reclamation costs (\$0.30/gal.)	3,600.00

2. Squeegee Clean Tank

Crew:	
1 Foreman \$18.30/hr. x 24 hrs. -	439.20
1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay) x 24 hrs. -	480.00

3. Use of high pressure water for two days 800.00

4. Disposal and transportation of Wash Water
(1,200 gallons @ \$0.12/gallon) - 144.00

5. Transportation of wastewater
300 miles x \$1.75/mile - 525.00

Total - Phase I \$7,819.48

Phase II - Remove and Dispose of Tank

1. Disconnect and Remove Appurtenant Equipment

Crew:	
1 Foreman \$18.30/hr. x 8 hrs. -	\$ 146.40
2 Laborers \$17.00/hr. x 8 hrs. -	272.00

2. Torch Tank

Crew:	
1 Foreman \$18.30/hr. x 8 hrs. -	146.40
1 Laborer \$17.00/hr. x 8 hrs.	136.00

3. Remove Tank

Crew:		
1 Foreman	\$18.30/hr. x 2 hrs. =	36.60
4 Laborers	\$16.80/hr. x 2 hrs. =	134.40
1 Backhoe	\$28.97/hr. x 2 hrs. =	57.94
Equipment	\$200 Lump Sum =	200.00

Total Phase II = \$1,130.00

Phase III - Concrete Demolition

1. Demolition of concrete pad	\$ 750.00
2. Removal and disposal of concrete 200 cyd at \$4.50/cyd	<u>900.00</u>
	\$1,650.00

Phase IV - Backfilling, Regrading, Soil Testing

1. Test for soil contamination 2 samples	\$1,000.00
2. Regarding	

Crew:		
1 F.E. Loader	\$27.38/hr. x 1 hr. =	27.38
Equipment	\$200.00 lump sum =	200.00
Backfill	10 c.y. x \$2.00 c.y. =	<u>20.00</u>

Total - Phase IV = \$1,247.00

Summary of Closure Cost for 12,000-gallon tank:

Phase I =	\$ 7,819.48
Phase II =	1,130.00
Phase III =	1,650.00
Phase IV =	<u>1,247.00</u>

\$11,846.48

2. CLOSURE OF DRUM STORAGE AREA - Remove and return drums to a reclaimer, clean the drum storage areas, and dispose of wash water generated.

a. 2 Truck Dr. \$17.56/hr. x 8 hrs.	\$ 280.96
2 Trucks - \$ 500 lump sum	500.00
Hauling cost = 2 loads x 300 miles x \$1.75/mile =	1,050.00

b. Clean drum storage areas

Crew:

1 Foreman \$18.30/hr. x 10 hrs. -	183.00
1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay) x 20 hrs. -	200.00

c. Dispose of wash water 700 gallons x \$0.12/gallon -	84.00
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d. Dispose of used solvents - 279 16-gallon drums x \$30/drum -	8,370.00
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e. Testing for contamination 1 sample x \$500.00 each	<u>500.00</u>
--	---------------

- \$ 11,167.96

3. CLOSURE OF RETURN AND FILL STATION - Remove, package and dispose of sediment, clean the dumpster and dock area, remove dumpster and dock structure for reuse or scrap.

a. 1 Truck @ \$250 lump sum each	\$ 250.00
Hauling Cost - 300 miles x \$1.75/mile	525.00
1 Truck Dr. \$17.56/hr. x 8 hrs.	140.48

Crew:

1 Foreman \$18.30/hr. x 8 hrs. -	146.40
1 Laborer (17.00/hr. & \$3.00/hr. hazard pay) x 8 hrs. -	160.00

b. Clean Dumpster and Dock Areas

Crew:

1 Foreman \$18.30/hr. x 8 hrs. -	146.40
1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay) x 8 hrs. -	160.00
Use of high pressure water for one day -	400.00

c. Disposal of wash water 200 gallons x \$0.12/gallon -	24.00
--	-------

d. Dispose of dumpster mud 15 55-gallon drums x \$300/drum -	4,500.00
---	----------

e. Testing for contamination 2 samples x \$75 each -	1,000.00
---	----------

f. Disassemble, and remove dumpsters and docks

Crew:

1 Foreman \$18.30/hr. x 8 hrs. -	146.40
2 Laborers \$17.00/hr. x 8 hrs. -	272.00
Equipment \$ 5.20/hr. x 8 hrs. -	41.60

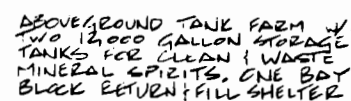
Total Dock Closure Cost -	\$7,912.00
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4. <u>PE CERTIFICATION</u> -	\$1,000.00
------------------------------	------------

5. TOTAL CLOSURE COST:

12,000-gallon tank -	\$11,846.48
Drum storage area -	11,167.96
Return and fill station -	7,912.00
P.E. certification -	<u>1,000.00</u>

Total	\$31,926.44
-------	-------------



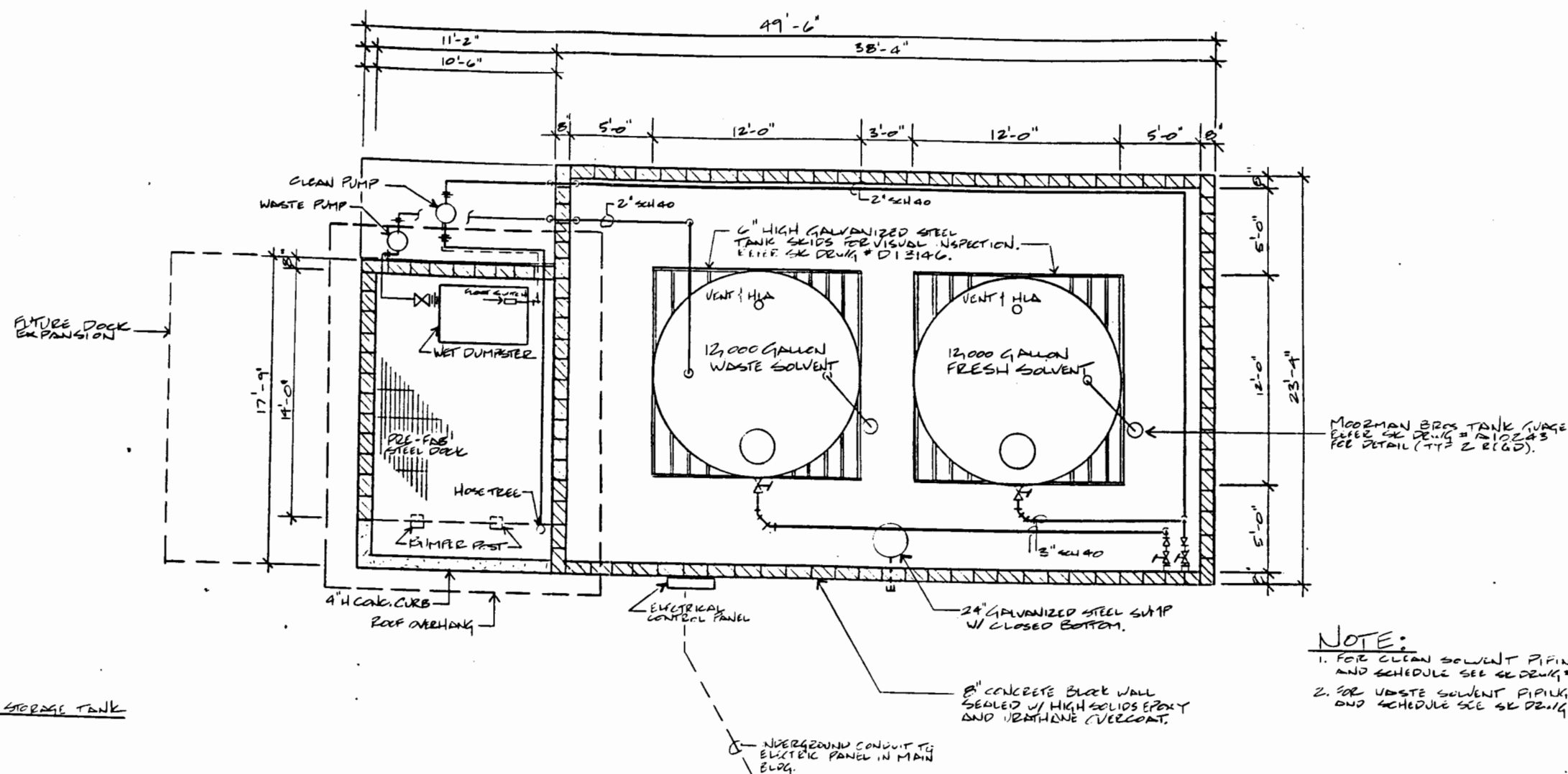
SITE PLAN
SCALE 1" = 20'

- LEGEND:
- ① ⑦ - TELEPHONE
 - ② ⑧ - FIRE EXTINGUISHER (TYPICAL 5th ABC CLASS)
 - ③ ⑨ - FIRST AID STATION
 - ④ ⑩ - "DANGER" SIGN
 - ⑤ ⑪ - "NO SMOKING" SIGN
 - ⑥ ⑫ - "CAUTION" SIGN

NEW ☐ EXISTING ☐

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORP. ANY REPRODUCTION, DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITING

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FORMULAE USED:

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r (TANK RADIUS) = 6'-0"
 L (DIKE LENGTH) = 37'-0"
 W (DIKE WIDTH) = 22'-0"
 H (DIKE HEIGHT) = 3'-0"

DIKE VOLUME: $(37'-6") (22'-0") (3'-6") (7.48 \text{ GAL/FT}^3)$: 18,266 GAL
 VOLUME OF LARGEST TANK WITHIN THE DIKE AREA : - 12,000 GAL
 TANK DISPLACEMENT VOLUME: $\pi (6'-0")^2 (2'-6") (7.48 \text{ GAL/FT}^3)$: - 2,115 GAL
 NOTE: TANK DISPLACEMENT ADJUSTED FOR TANK SKID.
 25 YEAR RAIN 24 HOUR PERIOD: 4.5" x DIKE AREA : - 2,283 GAL
 10% SAFETY FACTOR : - 1,200 GAL
 TOTAL EXCESS 668 GAL

SCALE = $1/4" = 1'-0"$

- LEGEND:
- ⑦ ⑦ - TELEPHONE
 - ⑬ ⑬ - FIRE EXTINGUISHER (TYPICAL 5" ABC CLASS)
 - ⑫ ⑫ - FIRST AID STATION
 - ⑪ ⑪ - "DANGER" SIGN
 - ⑩ ⑩ - "NO SMOKING" SIGN
 - ⑨ ⑨ - "CORROSIVE" SIGN

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1. ALL STEEL SURFACES TO BE PREPARED IN ACCORDANCE WITH 'STEEL STRUCTURE PAINTING COUNCIL' PRIOR TO PAINTING STEEL, REMOVE LOOSE RUST & MILL SCALE BY SANDBLASTING AND POWER TOOL WIRE BRUSHING AND GRINDING.

AFTER SURFACE PREPARATION, APPLY (1) COAT OF WHITE OXIDE PAINT AND (2) COATS OF ALKYD BASE GLOSS WHITE STRUCTURAL ENAMEL, E.G. MOBIL 12-W-4. ALLOW PAINT TO DRY 16-24 HOURS BETWEEN COATS TO INSURE PROPER SEALING.

2. STEEL TUBE TO CONFORM TO ASTM # A300 ($F_t = 42 \text{ K.S.I.}$)
ALL OTHER STEEL TO CONFORM TO ASTM # A36

D. ALL WELDS TO BE E 70 ELECTRODES.

9. SKID SHOWN IS DESIGNED FOR THE FOLLOWING TANKS CONTAINING LIQUIDS HAVING A SPECIFIC GRAVITY OF LESS THAN 1.0:

A. 12,000 GALLON, 10'-6" DIAMETER
B. 15,000 GALLON, 10'-6" DIAMETER

