safety-kleen®

Certified Mail - Return Receipt Requested

October 30, 1990
JJ 90-127

Mr. Dave Morgan
Environmental Improvement Division
1190 St. Francis Dr.
Santa Fe, New Mexico 87503

Subject: Farmington, New Mexico Service Center

Dear Mr. Morgan,

This has been prepared in response to your letter dated September 26, 1990. Please find enclosed responses to your comments, revised texts, revised exhibits and computer disk reformatted in Word Perfect. I have not enclosed any information that was discussed during our meeting on October 12, 1990. This information will be forwarded to you by November 12, 1990.

If you have any questions or require further information, please contact me on extension 2227.

Sincerely,

Jennifer M. Jendras
Environmental Permit Writer

JJ/dfh

cc: W. Johnson, Denver Reg. Mgr.
Br. Mgr. (7-008-21)
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SAFETY-KLEEN CORP.

FARMINGTON, NEW MEXICO SERVICE CENTER

RESPONSES TO COMMENTS DATED SEPTEMBER 26, 1990

Pt. IX, S 270.13: Contents of Part A

1. Pt. IX, S 270.13(j) requires a listing of the wastes to be stored at the facility and an estimate of the quantity of those wastes to be handled annually.

Comment A:

The facility capacity estimate given in the September 7th Part A for container storage does not agree with the figure given on page 11 of Part B 4,464 gal. vs. 2,880 gal.). Which figure is accurate, and how is it derived? In other words, how many containers will be stored and in what configuration at maximum capacity?

Response A:

The maximum facility capacity for container storage is 4,464 gallons. At maximum capacity, the containers will be stored on 31 single and double stacked pallets each containing nine (9) sixteen-gallon drums (4,464 gallons). Two feet of aisle space will be maintained and the drums will be stored no more than two high. This information has been included in Section 1.2.2. An enclosed floor plan map shows the configuration in which the containers will be stored.

Comment B:

The annual quantity estimates given in Part A and on page 11 of Part B do not agree with the annual quantity estimate for spent mineral spirits given on page 12 ("...6000-7000 gallons are removed every two weeks."). Please ensure that all quantity estimates agree and are reasonable accurate estimates of the maximum annual quantities of wastes that will be handled during the life of the permit.

Response B:
The latest Part A application enclosed is accurate. The estimated annual amount of mineral spirits generated is 50,000 gallons. An estimated 5,000 gallons are removed from the spent solvent tank once every month. This has been added to section 2.1.1.

Pt. IX, S 270.14: Contents of Part B

1. Pt. IX, S 270.14(b)(10) requires, among other things, an estimate of the volume of traffic in the vicinity of the facility.

Comment A:
Please provide an estimate of the traffic passing the intersection of Troy King Rd. and U.S. Hwy. 550 (on both roads), and an estimate of the average and maximum traffic into and out of the Safety-Kleen facility, including the timing of the Safety-Kleen traffic.

Response A:
The traffic pattern passing by the intersection of Troy King Rd. ad U.S. Hwy 550 is fairly steady flow, as Hwy. 550 is a U.S. Hwy. The Farmington facility is located on Hawkins Rd. which is off of Troy King Rd. There is only one truck which services the Farmington facility and it leaves the facility in the morning to go on route and returns once again in the afternoon for off-loading. The state highway department has been contacted to give Safety-Kleen an estimated traffic flow on U.S. Hwy 550 and Troy King Rd. This information will be forwarded to you upon receipt.

Approximately once every month a tanker truck arrives at the facility to remove spent mineral solvent and approximately 3-4 times per year a truck arrives at the facility to transport stored containers to a recycle facility.

2. Pt. IX, S 270.14(b)(11)(iii) requires "...a copy of the relevant Federal Insurance Administration flood map, if used, or the calculations and maps used where an FIA map is not available."

Comment A:
Please provide a legible and clearly labeled copy of the relevant Federal Insurance Administration map, or other map and calculations used to demonstrate that the facility is not in a flood plain.

Response A:
The above has been enclosed and shows that the Safety-Kleen facility is not located within the flood plain. It should be added to Appendix C of the Appendix C of the application.

Pt. V, S 264.13: General Waste Analysis

1. Pt. V, S 264.13(a) requires an analysis of waste adequate for proper treatment, storage, or disposal, including compliance with the requirements of the Land Disposal Restrictions.

Comment A:
EID recognizes the impracticality of performing routine laboratory analyses of waste while it is stored at the Farmington facility. Nevertheless, we are concerned that "analysis" of the waste based solely on its appearance and smell at the time of pickup provides inadequate information as to whether the waste may contain unexpected constituents. Please provide a clean and specific explanation of what analyses are performed at the Denton recycling center (or any other facilities to which waste from the Farmington center may be sent) that pertain to waste traceable to the Farmington facility.

In other words, please answer questions including (but not limited to): What analyses are done on the contents of the drums of immersion cleaner that come from Farmington? What is the sampling an selection regimen, what analyses are done, how frequently are they repeated, and where is the information

maintained? How would the Farmington facility be notified if abnormal constituents were found, and what other actions would be taken to ensure that it does not store wastes not allowed under its permit, and that accurate and up-to-date information on the waste constituents is available in the event of a release?

Please answer the same questions for the dry cleaning wastes, the bulk mineral spirits waste, and any other wastes stored at the facility. In addition, please explain how transportation of mineral spirits waste is handled, particularly whether a truckload of spent solvent always comes entirely from one identifiable Safety-Kleen facility or if a truckload may contain solvent from more than one facility.

Response A:

Enclosed are the current waste analyses for each waste stream at the Farmington, New Mexico service center. Also enclosed are Tables D-1 through D-4 which describe sampling and selection regime and frequency of analyses. The recycle center located in Denton, Texas maintains this information and sends it to the service centers. If any sample of the waste solvent does not meet standard acceptance criteria, the recycle center will phone the branch manager and alert him to the situation before any further processing is done. The branch manager has the right to refuse any further service to a business which has returned waste unable to meet acceptable criteria. If the particular acceptance criteria is not met, a determination will be made as to what processing technology is required. The material is processed accordingly which may include transportation to another processing facility. Each truckload of spent mineral spirits comes from one identifiable Safety-Kleen facility. The recycle center and the branch facility have accurate up-to-date information on the waste constituents which are available in the event of a release. This information has been added to section 2.2 and Appendix D.

Comment B:

Please clarify what instruction is given to Safety-Kleen clients on the use of their solvent(s) and exactly what they are required to do by way of notifying Safety-Kleen that unusual constituents may be present or that the waste-generating process may have changed.

Response b:
The above has been included in Section 2.2.

Comment c:
Please provide an updated Section 2.5. reflecting the land disposal restrictions promulgated on May 8, 1990 (the "third third" restrictions).

Response c:
Section 2.5 has been revised to reflect this.

Comment d:
Please provide clear answers, specific to the Farmington facility, for the following questions:

> Does the Farmington service center accept solvent waste from customer-owned machines? If so, is such waste subject to any additional analyses not performed on waste collected from Safety-Kleen owned machines? If it is accepted, where and how is it stored?

Response d:
Safety-Kleen provides a parts cleaner service for users who own their machines. The used solvent is pumped (using a hand pump) from the customer-owned machine to a standard Safety-Kleen 16- or 30- gallon drum by a Safety-Kleen sales representative. The waste solvent is stored in the same manner as the waste solvent collected from our leased parts cleaner machines. The sales representative then refills the customer-owned machine with Safety-Kleen mineral spirits solvent via the handpump. The same analyses are performed on waste solvent from customer-owned machines as are done on our leased parts cleaner machines. This information has been added to Section 1.1.1.

Comment e:
When spent solvents are collected from a client's premises, is an inspection routinely done to check for the presence of a heavier-than-water layer at the

bottom of the mineral spirits or immersion cleaner? If such material is found, is it analyzed?

Response e:

A visual inspection of the contents in the drum will be performed by the sales representative to check the presence of a heavier-than-water layer at the bottom of the mineral spirits or immersion cleaner drum. If such a situation is detected an inquiry of the customers 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. This information is in Seciton 2.2.1.

Comment f:

How are dry cleaning wastes "verified", as mentioned on p. 17?

Response f:

Section 2.2.1 has been revised to include this information.

Comment g:

On p. 13 it is stated that about 17% of the dry cleaning waste is mineral spirits, but elsewhere in Part B of the application it is stated that no ignitable materials are stored in the container storage area. Similarly, a process flow diagram in Appendix B indicates that sludge from the wet dumpster is drummed and stored until it can be sent to a recycling facility. If these two waste types are present, where are they stored? What measures are taken to ensure that they are always stored at least 50-feet from the property line? What analyses or other methods are used to ensure that ignitable wastes are correctly identified?

Response g:

The dry cleaning solvent currently used is 95% perchloroethylene and 5% trichloro-trifluoroethane. Section 2.1.2 has been revised to reflect this. The containerized mineral spirits at the facility are handled on a transfer basis only.

Pt. V, S 264.14: Security

1. Pt. V, S 264.14(c) requires that warning signs must be duplicated in any locally prevalent language besides English.

Comment a:
Please provide a schedule for supplementing the English "Danger" signs with equivalent signs in Spanish and Navaho, if such signs are not already present.

Response a:

The Farmington facility has visible warning signs posted in both English and Spanish. Safety-Kleen is inquiring into the acquisition of these warning signs in Navaho.

Pt. B, S 264.15: General Inspection Requirements

1. Pt. V, S 264.15(1) requires a written inspection schedule.

Comment a:
There are two different inspection schedules accompanying the application. Please clarify precisely which schedule form is used at the Farmington facility. If a "generic" Safety-Kleen inspection form is used, please indicate any items that are not applicable, and ensure that it is clear precisely what the inspection interval is for each item on the list.

Response a:
The inspection schedule used at the Farmington facility has been enclosed.

2. Pt. V, S 264.15(b)(3) requires that the inspection schedule identify the kinds of problems to be looked for during an inspection.

Comment a:
Please ensure that the inspection schedule used satisfies this requirement (one of the forms included in the application satisfies it; the other does not).

Response a:
The enclosed inspection schedule meets the requirements in Pt. V, S 264.15(b)(3).

Pt. V, S 264.16: Training

It is not clear from the description of the training program in the application exactly how it works. Please provide a rewritten training section explaining clearly how the program satisfies the requirements of Pt. V, S 264.16, including in particular:

Comment 1:
Pt. V, S 264.16(a)(2). Who trains whom? Several resumes are included in the application indicating considerable training experience, but it is not explained who these people are, what they do, or how any needed replacements would be selected. Similarly, it is not clear what training courses are given to which employees. The course mentioned in the text do not clearly correspond to the outlines provided in Appendix G.

Response 1:
The persons listed on the resumes in Appendix G are personnel working for Safety-Kleen's Environment Health and Safety Department. All of these people provide input to Safety-Kleen's training program and any of them may participate in the actual training. Robert Wachsmuth, Regional Environmental Engineer, directly trains new branch managers. The branch manager, in turn, trains his employees. An employee may not work in an unsupervised position

until he or she has received proper training as outlined in Appendix G. This information has been added to section 5.1.

Comment 2:

Pt. V, S 64.16(a)(3). Please ensure, and clearly demonstrate that all personnel at the facility have had training that satisfies the content requirements of this paragraph.

Response 2:

A statement to this effect has been added to Section 5.1.

Comment 3:

Pt. V, S 264.16(c). Please clarify exactly what is contained in the annual reviews given to each employee - is the course outline the same as the introductory material' if not, how does it differ? Please provide information relevant to each employee.

Response 3:

A copy of annual training topics has been included in a revised Appendix G. An agenda for branch manager training has also been included.

Comment 4:

Pt. V, S 2641.6(d) and (e). EID recognizes that the information required by these sections is to be maintained at the facility and is not specifically required to be submitted with a permit application. However, it would be helpful in determining the adequacy of the training program if you would submit documentation demonstrating that each employee has successfully completed the required training and/or experience for their position. In addition, as mentioned above, please be sure it is clear exactly what introductory and ongoing training each employee has had; and ensure that the list of job title(s), job descriptions, qualifications, duties, and names of incumbents are complete and up-to-date.

Response 4:
A list of introductory and annual training topics has been included in Appendix G. Enclosed is recent documentation demonstrating employee training.

Pt. V, S 264.176:
Ignitable, Reactive, or Incompatible Waste

Comment 1:
The tank assessment by TERA Inc. recommends that the mineral spirits tanks be grounded to minimize chances of accidental ignition. Please provide evidence that this has been done.

Response 1:
As of May 5, 1989 the mineral spirits tanks have been grounded at the Farmington, New Mexico Service Center. Documentation to this procedure have been requested and will be forwarded to you upon receipt.

Pt. V, Subpart C: Preparedness and Prevention

1. Pt. V, S 264.32(a) requires all hazardous waste facilities to have an internal communications or alarm system, unless it can be demonstrated not to be needed.

Comment a:
Please describe how the tenant(s) who are sharing the building in which the Safety-Kleen container storage facility is located would be warned of a fire or other emergency. Please include details of the construction and fire rating of the wall between Safety-Kleen's premises and the adjoining tenant's premises.

Response a:

The tenant sharing the building with the Safety-Kleen facility is rarely on-site. The tenant uses the adjoining facility for storage purposes only and stores several recreational vehicles on-site. If an emergency did occur, the police or fire department would be called on to alert the owner.

2. Pt. V, S 264.32(c) requires (among other things) adequate fire and spill control equipment.

Comment a:

Please specify how many fire extinguishers there are at the Farmington facility, what size they are, and where they are located.

Response a:

There are three (3) 10-pound fire extinguishers located at the Farmington facility and their locations have been noted on the enclosed floor plan map in Appendix C. There is also a 5-pound fire extinguisher located on the facility's route truck.

Comment b:

Please explain what the absorbent material referred to in Appendix E actually is, what quantity is to be kept on-hand (how big is a sheet or bale), and the basis for considering that quantity adequate.

Response b:

The absorbent material is made of a spun bound polypropylene. The quantity to be kept on-hand is one bale in the spill response area, one bale on the loading dock, one bale stored on the route truck, and two bales kept in stock. Each bale contains 100 36" x 36" absorbent sheets. This is considered an adequate amount to handle small spills. If a spill occurred which was too large to be cleaned up using the absorbent material, it would be considered a major spill and the branch manager would follow procedures listed in Section 4.3.2

Pt. V, Subpart D: Contingency Plan

1. Pt. V, S 264.52(a) requires a description of actions to be taken in the event of a fire, explosion, or release of hazardous waste.

Comment a:
No specific mention is made in the contingency plan of responses to a possible explosion. Please either explain why an explosion is not realistically possible at the Farmington facility, or include a contingency plan that addresses planned responses to an explosion.

Response a:
The above information has been included in Section 4.3.3.

2. Pt. V, S 264.51(e) requires a list of the location, description, and capability of all emergency equipment at the facility.

Comment a:
The list in appendix E is somewhat vague: it does not always discuss the precise location of the equipment in the Farmington facility, its capabilities, or the actual quantities available. Please provide an updated, accurate list satisfying these requirements. Please ensure that it accurately reflects the Farmington facility - we are not interested in what "should normally" be in a standard Safety-Kleen facility.

Response a:
An updated emergency equipment list has been enclosed. It should be added to Appendix E.

3. Pt. V, S 264.55 requires that there be, at all times, at least one employee on site or on call capable of coordinating emergency activities and with the authority to commit any needed resources for emergency activities. "On call" is defined as capable of reaching the facility in a short time.

Comment a:

Two Safety-Kleen employees are listed as potential emergency coordinators, but one (Dave Rockwell) lives in Albuquerque. We do not believe that someone could travel from Albuquerque to Farmington in what could reasonably be called a "short time." Accordingly, based on information in the application, it does not appear that an employee will be available at all times to act as an emergency coordinator as defined in the Hazardous Waste Management Regulations. Please demonstrate that an employee will be available at all times to act as an emergency coordinator as required.

Response a:

Homer Manning, the warehouseman employed at the Farmington facility is the new alternate emergency coordinator. He will be available at all times to act as an emergency coordinator and his address and phone number have been added to Appendix F.

4. Pt. V, S 264.56(e) requires measures to minimize the occurrence, recurrence, or spread of fires, explosions, and releases.

Comment a:

Page 46 refers to procedures for handling solvents spilled in or flowing into a "non-explosion-rated" area. Please clarify what is meant by an explosion-rated area, and what parts of the Farmington facility are or are not such areas.

Response a:

An explosion proof area is one in which special wiring has been used. Only the return and fill station contains this type of wiring. This information has been added to section 4.3.1.

Comment b:

Except for removal of liquids from the sump in the tank containment area, discussed on p. 7, no mention is made of the methods used to remove spilled liquids. Please provide a description of pumps or similar equipment

maintained on-site (if any) for the removal of precipitation or spilled liquids. If none is present, please explain how the liquids would be handled. In the event of a substantial release from one of the solvent tanks into the containment, or a situation requiring rapid emptying of one of the tanks for emergency inspection or repairs, how would the mineral spirits be removed, where would they be stored, what would be their final disposition, and how soon could a response be made to an emergency situation?

Response b:

In the event a container needs emptying, a pump located on the facility will be used to remove the liquid and pump it to a new container. In the event liquid from a tank needs to be removed, tanker trucks will be used to remove the liquid and haul it to the recycle center. A wet/dry vacuum is present at the site to be used in the event of a minor spill. Sorbent pads can also be used to wipe up any minor spill. This information has been added to section 4.3.1.

Comment c:

Please clarify the responsibilities and capabilities f the Emergency Response Contractor mentioned on page 46 and listed in Appendix F.

Response c:

Information pertaining to responsibilities and capabilities of Rinchem, our Emergency Response Contractor, have been requested and will be forwarded to you upon receipt.

5. Pt. V, S 264.56(g) requires the handling of contaminated material resulting from emergency response as hazardous waste, including compliance with generator requirements, unless it can be demonstrated to be non-hazardous.

Comment a:

Details are not provided for the sampling and analysis techniques that would be used to determine the hazardousness (or nonhazardousness) of material resulting from spill cleanup. Please provide a detailed description of how

these determinations would be made. (Note the very similar requirement below for material generated during closure).

Response a:
Contaminated equipment resulting from remedial actions for spills must be cleaned and decontaminated. If it is a paved or metal surface, this can be done using a detergent solution. A paragraph to this effect has been added to Section 4.3.2.

Pt. V, S 264.73: Operating Record

1. Pt. V, S 264.73 requires a written operating record to be maintained at the facility, and specifies the kinds of information that must be recorded in it.

Comment a:
Some of the items required by S 264.73 are mentioned at various points in the application, but others are omitted. Please provide a comprehensive list of the documents to be included in the operating record maintained at the Farmington facility, and ensure that they already satisfy the requirements of S264.73, at a minimum.

Response a:
The above information has been added as Section 2.6.

Pt. V, Subpart G: Closure

1. Pt. V, S 264.112(b)(4) requires that the closure plan include detailed procedures for, among other things, determining the extent of any contamination, for sampling, and for determining satisfactory closure performance standards.

Comment a:

Please state who will be performing the closure cleanup and sampling activities. Will it be Safety-Kleen personnel or outside contractors? If the decision will be deferred until the actual date of closure, please explain how the decision will be made. In any case, please state the qualifications that will be required of the personnel doing the work.

Response a:

An outside contractor will be performing the closure cleanup and sampling activities. The contractor used will have worked with Safety-Kleen prior to cleanup so we can be aware of their capabilities. A state licensed professional engineer will be on-site periodically to certify the adequacy of the cleanup activity. This information has been added to section 6.1.

Comment b:

Please be very much more specific in describing the details of the sampling and analysis involved in closure activities. For instance, a photoionization (PI) detector may indeed be an appropriate instrument for screening the area around the tanks for contamination, but some adequate method must be used to ensure that the gas concentrations of potential contaminants to be measured by the PI detector accurately reflect the contaminants possibly present in the soil. In other words, a surface scan is unlikely to reveal evidence of subsurface contamination. Some regimen of soil coring, for instance, could enable an investigator to assess potential soil contamination much more accurately and confidently.

Response b:

A photoionization detector is no longer used to detect soil contamination. The soil will be sampled and analyzed for mineral spirits, and TCLP contaminants (except pesticides). If contamination is indicated, it will be confirmed with an extent of contamination soil study. The soil will be overexcavated or otherwise treated to eliminate contamination. Soil samples will be collected and analyzed after clean-up to insure decontamination has been achieved. This has been added to Section 6.2.3.

Comment c:

A photoionization survey of the container storage area also seems a reasonable first step in assessing the success of closure cleaning efforts. Please provide a much more detailed description of how the procedure would be carried out, addressing, for instance, the sampling pattern to be used, the calibration techniques to be used for the instrument (bearing in mind the variety of compounds to be screened for), the response time to be provided at each sampling location, and so on.

Response c:

A photoionization survey will no longer be used to access the clean-up of the container storage area. The concrete floor and spill containment sumps will be cleaned with a detergent solution and the final rinsate will be analyzed for volatile organic compounds. If any volatile organic compounds are present, the washing and rinsing must be repeated until they are no longer detectable. This has been added to Section 6.3.

Comment d:

In addition to the photoionization screening, some other method of demonstrating the post-closure decontamination of the concrete slab (as distinct from the air immediately above it) in the container storage area is needed. A program of random wipe sampling might be one way to address this need, if the surface of the concrete will permit it; alternatively, analysis of concrete core samples or of rinsate water might be used. Please note the requirement below to provide more information on the surface coating of the concrete.

Response d:

A photoionization screening will no longer be used to detect contamination of the concrete slab. The concrete base is designed free of cracks and gaps and has been sealed with an epoxy and urethane coating to render it impermeable. If any cracks are present, soil samples must be collected from beneath the cracks and analyzed for volatile organic compounds. If contamination is present, a workplan must be developed to determine the extent of contamination and proper remedial action. This has been added to Section 6.3.

Comment e:

Please explain how the material resulting from demolition of the tanks, tank ancillary equipment, and containment areas will be tested to determine if it must be handled as hazardous waste and whether it is acceptable for land disposal (see paragraph f below).

Response e:

The above information has been added to Section 6.2.3.

Comment f:

Please amend the closure plan to address sampling and analysis of closure residues, including rinse waters, for Land Disposal Restriction treatment levels.

Response f:

The above has been added to the closure plan in Chapter 6.

Comment g:

Please state the quantitative levels that will be used as closure performance standards: photoionization detector levels that will be considered "clean", how other sampling results will be interpreted, and so on.

Response g:

A photoionization detector will no longer be used to determine clean equipment or soil. Soil and rinsate will be analyzed until contaminant levels have been found to be no longer detectable or to levels agreed upon with the EID. Statements to this effect have been added to 6.2.3., 6.3, and 6.4.

2. Pt. 5, S 264.112(d) requires, among other things, that EID be notified at least 45 days in advance of known closure; and that closure activities begin within 30 days of receipt of the known last volume of hazardous waste.

Comment a:

Please adjust the closure schedule and closure plan text to incorporate clear reference to these two requirements.

Response a:
The above has been added to Section 6.5. and the closure schedule.

Pt. V, Subpart H: Financial Requirements

1. Pt. V, S 264.143 requires financial assurance for closure costs to be established by one of several mechanisms, one of which is the financial test chosen by Safety-Kleen.

Comment a:
While nothing appears to be amiss with the substance of the financial test information submitted, the letter provided by Safety-Kleen's Financial Vice-President follows a format mandated by a now-outdated version of the New Mexico Hazardous Waste Management Regulations (referred to as HWMR-4). The current version of the Regulations (HWMR-5) has adopted by reference the precise language used in the Code of Federal Regulations. Accordingly, please submit a letter worded as required by S 264.151(f), including all four relevant numbered paragraphs.

Response a:
The most recent financial test is enclosed in Appendix H.

Comment b:
In the financial test letter submitted with the 1990 version of the application, closure and/or post-closure liabilities in the states of California, Illinois, Kentucky, Massachusetts, Michigan, New Jersey, New York, Ohio, Pennsylvania, Texas, and Wisconsin do not appear, whereas they were listed in the 1987 version of the application. Please explain how closure-post-closure liabilities in these states are handled.

Response b:
The above states were omitted from the 1990 financial test letter as they currently have different forms of financial assurance (letters of credit).

Comment c:
Quite possibly through oversight on our part, we can find no current liability insurance certificate in our files for the Farmington facility. Please include a copy.

Response c:
A copy of the above has been enclosed. It should be added to Appendix H.

Pt. V, Subpart I: Container Storage Requirements

1. Pt. V, S 264,175(v)91) requires a containment system free of cracks or gaps and sufficiently impervious to certain leaks or spills.

Comment a:
Please provide details of the concrete coating used on the floor and curbing in the container storage building.

Response a:
The concrete coating used on the floor and curbing is coated with a chemical-resistant epoxy and urethane so as to be impermeable and to contain leaks and spills. This has been added to Section 3.3.2.

2. Pt. V, S 264.175(b)(2) requires containers to be protected from accumulated liquids.

Comment a:
Please clarify how this is done (e.g. storage on pallets, sloping floor, or other means).

Response a:
All containers stored at the Farmington facility are placed on pallets. This information has been added to Section 3.3.2.

Pt. V, Subpart J: Tank System Requirements

1. The tank assessment provided by TERA Inc. mentions, on p. 5, that at least one emergency vent cover on the solvent storage tank(s) was padlocked closed, and recommended that the padlock be removed.

Comment a:
Please document that the emergency vent covers can function properly.

Response a:
The padlock has been removed from the emergency vent cover and the emergency vent covers function properly.

2. Pt. V, S 264.196(d) requires notification of the New Mexico Health and Environment Department of any spill or release of hazardous waste within 24 hours (except for spills of one pound or less that are immediately cleaned up); followed within 30 days by a report containing the information set out in Pt. V, S264.196(d)(3).

Comment a:
Please clarify section 4.2.3 (reporting responsibilities) to reflect unambiguous compliance with these requirements.

Response a:
The above requirements have been added to Section 4.2.3.

3. Pt. Vs, S 264.196(f) requires that any extensive repairs to the tank shelter must be assessed and certified by an independent engineer before the system is returned to use.

Comment a:
Please include language reflecting this requirement.

Response a:

The above requirement has been added to Section 3.4.4.

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

Revised: October 25, 1990

CONTENTS

Section		Page
1.0	**FACILITY DESCRIPTION**	1
	Abstract	1
	1.1 Description of Business Activity	3
	1.1.1 Parts Cleaner Service	4
	1.1.2 Dry Cleaner Service	5
	1.2 Description of the Facility	12
	1.2.1 Regional Description	12
	1.2.2 Waste Management Practices	15
2.0	**WASTE ANALYSIS PLAN**	17
	Abstract	17
	2.1 Description of Wastes	18
	2.1.1 Wastes Resulting from the Parts Washer Service	18
	2.1.2 Wastes Resulting from the Dry Cleaner Service	20
	2.2 Quality Control Procedures	20
	2.2.1 Parts Washer Service	24
	2.2.2 Dry Cleaner Waste Collection Service	32
	2.3 Waste Analysis at the Recycle Center	34
	2.4 Waste Analysis Plan Update	38
	2.5 Land Ban Notification/Certification Forms	38
3.0	**PREPAREDNESS AND PREVENTION PLAN**	41
	Abstract	41
	3.1 Security Measures	42
	3.2 Inspection Procedures	43
	3.3 Facility Design	46

3.3.1 Tank Storage 46
3.3.2 Drum Storage 47

3.4 Plant Operations -- Potential Spill and Fire Sources and Control Procedures 48

3.4.1 Potential Minor Spill Sources 48
3.4.2 Potential Major Spill Sources 50
3.4.3 Potential Fire Sources 50
3.4.4 Tank Evaluation and Repair Plan 52
3.4.5 External Factors 53

3.5 Internal and External Communications and Alarm Systems 54

4.0 **CONTINGENCY PLAN** 55

Abstract 55

4.1 Purpose 56

4.2 Emergency Coordinator Responsibilities 56

4.2.1 Responsibilities During an Emergency 57
4.2.2 Remedial Action Responsibilities 58
4.2.3 Reporting Responsibilities 59
4.2.4 Chain of Command 61
4.2.5 Government Agencies and Local Authorities to be Notified 62

4.3 Emergency Response Procedures 63

4.3.1 Minor Spills 63
4.3.2 Major Spills 65
4.3.3 Fire Control Procedures 67

4.4 Evacuation Plan 68

4.5 Arrangements with Emergency Response Contractors 69

4.6 Pollution Incident History 69

4.7 Implementation Schedule 69

4.8 Availability and Revision of the Contingency Plan 70

5.0 **PERSONNEL TRAINING** 72

Abstract 72

5.1 Outline of Training Program 73

5.2 Organization Structure and Job Descriptions 73

5.2.1 Branch Manager 74

5.2.2 Environment, Health and Safety Department 75

5.3 Description of the Training Program 76

5.3.1 Training of New Branch Managers 76
5.3.2 Training of New Branch Secretaries 77
5.3.3 Training of New Sales Representatives 78
5.3.4 Training of New Warehousemen 78
5.3.5 Annual Training 78

5.4 Training Records 79

6.0 **CLOSURE PLAN** 80

Abstract 80

6.1 Purpose 81

6.2 Aboveground Tank and Associated Piping 81

6.2.1 Removal of the Waste Material and Opening of the Tank 82
6.2.2 Removal of Residual Waste and Cleaning of the Tank 83
6.2.3 Removal of the Tank 87

6.3 Drum Storage Area in Warehouse 89

6.4 Solvent Return and Fill Station 89

6.5 Facility Closure Schedule and Certification 90

APPENDICES

A PART A APPLICATION

B PROCESS FLOW DIAGRAMS

Safety-Kleen Solvent Use and Regeneration Loop
Unit Process for the Handling of Spent Mineral Spirits
Unit Process for the Handling of Spent Immersion Cleaner Dry Cleaning Waste

C MAPS AND FACILITY DRAWINGS

Topographic Map
Aerial Photograph with Contours 1" = 200'
100-Year Flood Plain Map
Pump Stations Map
Storm Drainage Map
Wind Rose
Site Plan

Floor Plan

D ANALYTICAL DATA

Analyses of Spent Mineral Spirits
Analyses of Mineral Spirits Dumpster Sediment
Analyses of Spent Immersion Cleaner (4 pages)
Analyses of Dry Cleaner Still Bottoms (3 pages)
Analyses of Dry Cleaner Filter Residue (3 pages)
Mineral Spirits Specifications
Immersion Cleaner Specifications
Dry Cleaner Perchloroethylene Specifications
Information on Analyses Performed at Recycle Center (4 pages)

E EQUIPMENT INFORMATION

Facility Inspection Record and Procedure
Emergency Equipment List
Tank Details (D 10760)
High Level Alarm System Installation Details (D 11533)
High Level Alarm System Installation Information (D 11534)
Dock and Dike Details (D10238)
Concrete Construction Details (D 11322)
Steel Drum Construction Details (4 pages)
Dry Cleaning Drum Construction Details (3 pages)
Dry Cleaning Box Construction Details (11 pages)

F EMERGENCY INFORMATION

Emergency Information for Service Center
Employees' Functions During an Emergency
Letters to Local Authorities (3 pages)
Safety-Kleen Corporate Policies on Safety and Emergency Response (18 pages)
Spill Report Telephone Log

G TRAINING INFORMATION

Organization Charts
List of Service Center Employees
Job Descriptions (2 pages)
Trainer Resumes (9 pages)
Training Plan Outlines (4 pages)
Training Record Forms (3 pages)

H FINANCIAL REQUIREMENTS

Closure Schedule
Closure Cost Estimate (3 pages)
Financial Assurance Documentation (17 pages)
Certificate of Liability Insurance
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 and the codes listed in the note below)
Container Storage-- Warehouse	4,464	448.8	Spent Immersion Cleaner (F002, F004 and the codes listed in the note below) Dry Cleaning Waste (F002 and the codes listed in the note below)

NOTE: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043

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. Approximately once every month 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. The used solvent is pumped (using a hand pump) from the customer owned machine to a standard Safety-Kleen 16- or 30-gallon drum by a Safety-Kleen sales representative. The waste solvent is stored in the same manner as the waste solvent collected from our leased

parts cleaner machines. The sales representative then refills the customer-owned machine with Safety-Kleen mineral spirits solvent via the handpump. The same analyses are performed on waste solvent from customer-owned machines as are done on our leased parts cleaner machines.

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. Approximately 3 to 4 times a year 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 total volume of waste and product will not exceed 10 times the secondary containment volume.

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 black 16- and blue 20- and 30-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. All containers are stored on pallets.

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

Waste Description	EPA Waste Code Nos.	Facility Capacity[1]	Annual Amount[2]
Spent Mineral Spirits	D001[3]	12,000	50
Bottom Sediment From the Tank	D001[3]	N/A	2
Spent Immersion Cleaner	F002, F004[3]	4,464[4]	3
Dry Cleaning Waste	F002[3]		6

1 The facility capacity is in gallons.
2 The annual amount is in thousands of gallons.
3 and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043
4 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

Four types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. It should be noted that the solvents managed at this facility are only incompatible with strong oxidizers and reactive metals, none of which are present in the containers, container storage area, or the concrete sealant. The solvents are also compatible with one another. 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 5,000 gallons are removed every month. This waste is ignitable (D001) and TCLP toxic using

the characteristic leaching procedures (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). 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 toxic using the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

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). The immersion cleaner formula is toxic using the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039,

D040, D041, D042, and D043). 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 95% of the dry cleaning solvent used is perchloroethylene (F002 and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043) and the remaining 5% is trichloro-trifluoroethane (F002) and toxic using the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). 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. If a container with questionable contents is returned to the service center, a sample will

be taken and analysis will be performed at the recycle center according to the procedures outlined in tables D-1 through D-4. Pending the results of the analyses the branch manager will be notified of any contamination that may have occurred. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

Safety-Kleen controls the use and management of its solvents by:

1. limiting the solvents stored to those compatible with one another and their containers.
2. limiting the uses of each type of solvent (for example, dry cleaning waste is <u>only</u> collected from dry cleaner shops);
3. determining the customer's type of business (i.e., his SIC code is recorded) and the purpose for which he will use the machine.
4. training customers to use the machines properly;
5. training employees to inspect spent solvent and determine whether it is acceptable;
6. indicating on the service document, <u>every</u> time waste is collected, whether the spent solvent meets Safety-Kleen's acceptance criteria (Item 14 in Appendix D);
7. marking each container with the customer's name, address and EPA I.D. number (if required). This information remains on containerized waste until it is accepted at the reclamation facility; and
8. keeping a record of each incoming and outgoing shipment in the operating log at each facility.

Safety-Kleen's customers sign a service document containing the following information:

a. the name, address and EPA I.D. number of the facility to which the waste is being shipped;

b. the customer's name, address and EPA I.D. number (if required); and

c. the description and amount of Safety-Kleen solvent waste generated.

In addition, each incoming and outgoing shipment is recorded in the facility's operating log.

If a waste is rejected at the time of service, the customer will be given a choice as to whether he will dispose of the waste himself or require Safety-Kleen's assistance. If he requests Safety-Kleen's assistance, a sample will be drawn using a Coliwasa tube and it will be analyzed for flash point and volatile organic compounds. If this analysis does not adequately define the constituents, additional analyses will be performed as necessary (e.g., for semi-volatile organic compounds, base-neutral compounds, PCBs, etc.). If the waste is acceptable at the branch, it will be relabeled and manifested appropriately and then managed with the other wastes. If it is not acceptable, it will either be: (a) managed on a 10 day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and shipped directly to a properly permitted reclamation or disposal facility.

The recycle center located in Denton, Texas sends waste analyses to the service centers. If any sample of the waste solvent does not meet standard acceptance criteria, the recycle center will phone the branch manager and alert him to the situation before any processing is done. The branch manager has the right to refuse any further service to abusiness

which has returned waste unable to meet acceptable criteria. If the particular acceptance criteria is not met, a determination will be made as to what processing technology is required. The material is processed accordingly which may include transportation to another facility. Each truckload of spent mineral spirits comes from one identifiable Safety-Kleen facility. The recycle center and the branch facility have accurate up-to-date information on the waste constituents which are available in the event of a release.

2.2.1 Qualitative Waste Analysis

a. General Inspection Procedures

Safety-Kleen visually inspects each drum of waste when it is collected at the customer's location. Safety-Kleen examines the waste for volume, appearance, consistency and odor and is intimately familiar with the characteristics of the waste it receives. Based on the known waste characteristics, Safety-Kleen has established the specific acceptance criteria set forth below, to be used by Safety-Kleen personnel in their visual inspections. These acceptance criteria allow Safety-Kleen to ensure that the waste being picked up is not contaminated.

If a particular drum of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) sample the waste for testing at a Safety-Kleen laboratory, as described below, to determine whether the waste has been contaminated; or (2) reject the drum of waste. In the event the waste is not sampled, Safety-Kleen will notify the

generator's State Agency that is authorized to implement the RCRA hazardous waste management program (or EPA if the RCRA program has not been delegated to the State).

If the waste is sampled for further analysis, the service representative will take a sample of the waste and then seal the drum and label it as hazardous waste. The drum is left with the customer pending the results of the laboratory tests. The laboratory testing involves analyzing the suspect waste for flash-point and the presence of volatile organic compounds using a modified EPA 8010 method (GC analysis). The costs of any sampling and testing performed as a result of the waste failing to meet the acceptance criteria, will be borne by the customer.

If the laboratory analysis reveals that the sampled waste is not contaminated, Safety-Kleen will accept the waste from the customer.

If the laboratory confirms that the waste is contaminated, the generator will be responsible for securing an alternate means of disposal. In the event the generator does not contract with Safety-Kleen to arrange for the treatment or disposal of waste which is sampled and found to be contaminated, Safety-Kleen will provide the generator's State Agency that is authorized to implement the RCRA hazardous waste management program (or EPA if the RCRA program has not been delegated to the State) with the results of this additional quantitative testing.

b. Waste Specific Criteria

The following is a description of the specific acceptance criteria for each waste stream.

I. Spent Mineral Spirits Solvent

The acceptance criteria for determining by visual inspection whether spent mineral spirits solvent has been contaminated are volume, odor and color, the most significant of which is volume. Spent mineral spirits solvent is collected in 30 and 16 gallon drums which, if no additional material has been added to the waste, should not hold more than 19 and 10 gallons respectively. If the volume of waste in a given drum exceeds the specified level, the Safety-Kleen service representative will sample the waste for laboratory testing as described above, or will reject the waste.

In addition to the volume criterion, the odor of the spent solvent will clearly indicate whether the waste has been contaminated. Spent mineral spirits solvent has a very distinctive odor. The service representatives are expressly instructed not to deliberately sniff the waste. However, if the mineral spirits solvent has been contaminated the service representative would immediately notice a difference in the odor when he services the machine.

The spent mineral spirits solvent is also visually inspected for its color. Unused mineral spirits solvent has a greenish tint. As the solvent is used, it turns brown in color. The more it is used, the darker brown it

becomes, until it is almost black. Therefore, if the spent solvent does not appear to be green, brown, or black, the service representative will sample the waste for possible contamination as described above, or will reject the waste.

II. Immersion Cleaner

Safety-Kleen is currently in the process of reformulating its immersion cleaner. Safety-Kleen is currently in the process of reformulating its immersion cleaner. Safety-Kleen believes that the new immersion cleaner will not be a hazardous waste under the current hazardous waste regulations.

A. Existing Immersion Cleaner

The criteria for the inspection of spent immersion cleaner are volume, color and physical state. There should be no more than 6 gallons of waste, a sample will be tested for contamination following the procedures described above or the waste will be rejected.

Unused immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. Therefore, if the spent immersion cleaner does not appear to be amber, brown or black, the service representative will either sample the waste for possible contamination as described above, or reject the drum of waste.

The drum of spent immersion cleaner should contain two phases, an aqueous phase and a solvent phase. The aqueous phase should compose approximately 20% of the total volume of waste. If the waste is not separated into phases, or if the aqueous phase is greater than 20%, the service representative will either sample the waste for possible contamination as described above, or will reject the waste.

B. New Immersion Cleaner

In the event the new immersion cleaner is determined to be a hazardous waste, the acceptance criteria and respective descriptions will be the same as those for the existing immersion cleaner, with the exception of the physical state criterion. The new immersion cleaner waste will not have phases, therefore, this criterion is not applicable.

c. Dry Cleaner Wastes

Dry cleaner wastes consist of spent filter cartridges, powder residue and still bottoms.

1. Spent Filter Cartridges

Spent Filter cartridges are placed in either a 15 gallon ("split 30") drum which holds 3 cartridges or a 16 gallon drum which holds either 1 jumbo filter cartridge or 2 smaller filter cartridges. It is obvious to the service representative whether the items in the drums are filter cartridges.

The drums may also contain approximately one inch of liquid which should either be clear or have a light brownish tine. If the amount of the liquid is greater than approximately one inch or if the liquid is a color other than light brown, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

II. Powder Residue

The criteria for the acceptance of powder residue are consistency and color, the former being the more significant criterion of the two. A drum of powder residue should not contain any liquid. As the name implies, it will be dry or "powdery" to the touch. if there is any liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

The powder residue is also inspected for color and should appear to be grayish-black. If the residue is not grayish-black in color, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

III. Still Bottoms

The criteria for the acceptance of dry cleaning still bottoms are

consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is too thin or if there is more than one inch of free liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or will be rejected.

In addition to consistency, the still bottom waste is inspected for color. The waste should appear dark brown or black in color. If the waste is a different color, a service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

d. Paint Wastes

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste.

I. Lacquer Thinner Waste

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in 5 gallon pails. The paint gun cleaning machine operates as a closed system whereby there should never be a combined volume of more than 7-1/2 gallons of solvent in the two collection pails. The solvent is pumped from a tube in a left hand pail (facing the machine) through the machine into a right hand pail. The tube in the left hand pail extends exactly half way into the pail (i.e. to the 2-

1/2 gallon mark). The left hand pail starts with 5 gallons of clean solvent which will be pumped out as the machine is used to clean the spray guns. This process will continue until the left hand pail contains 2-1/2 gallons of solvent. Any solvent above 2-1/2 gallons remaining in the left hand pail at the time of servicing will be pumped through the machine into the right hand pail by the Safety-Kleen service representative. Therefore, when the machine is serviced, the right hand pail will always contain 5 gallons of solvent. If a service representative discovers more than a total of 7-1/2 gallons of solvent in the two pails or there is an overfill from the right hand pail, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

II. Paint Waste

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative will insert a long glass tube into the drum. The tube should glide easily down to the bottom of the drum. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of

water. If there is more than approximately 10 inches of water in the 3 foot tube (the water and paint will separate in the tube and thus can be measured) the waste will be rejected.

2.2.2. Quantitative Testing

In addition to the qualitative testing described above, Safety-Kleen will perform quantitative testing on the following terms and conditions:

a. Applicability

Quantitative testing pursuant to section III of this waste analysis plan shall not be required for the following:

1. Spent filter cartridges, powder residue and still bottoms generated by customers in the dry cleaning business; and

2. Waste generated by customers who are conditionally exempt small quantity generators [i.e. customer which generate less than 100 kg/month of waste) (40 CFR 261.5(a)].

b. Testing Frequencies

I. For all other customers (i.e. those customers who are not conditionally exempt small quantity generators) and wastes (i.e., mineral spirits, immersion cleaner, Safety-Kleen will perform quantitative testing on the following basis:

A. For customer whose waste is collected monthly, testing will be performed once per year for each customer.

B. For customers whose waste is collected weekly, testing will be performed five times per year for each customer.

C. Subject to sections B 2 and 3 below, for those customers who are borderline small quantity generators (i.e. they may occasionally generate more than 100 kg/month of waste), quantitative testing will be performed once per year for monthly customers and five times per year for weekly customers.

II. The testing frequencies set forth in section 6.I.A and B above are only applicable to those Safety-Kleen customers for which the following conditions apply:

a. With the exception of paint waste, Safety-Kleen provides the virgin product from which the waste stream in question is generated; and

b. (1) For spent mineral spirits solvent waste, Safety-Kleen physically collects each container of spent waste from its customer during Safety-Kleen's servicing of its parts washer.

(2) For spent immersion cleaner waste, Safety-Kleen physically collects each container of spent waste from its customer during Safety-Kleen's servicing of its parts washer.

(3) For spent lacquer thinner waste, Safety-Kleen physically collects each container of spent waste from its customer

during Safety-Kleen's servicing of its paint gun cleaning machine.

(4) For paint waste, the generator also generates spent lacquer thinner waste from the paint gun cleaning machine supplied and serviced by Safety-Kleen, and all of the generators non-paint hazardous waste be from material originally supplied by Safety-Kleen.

III. For wastes that do not meet the conditions described in section b.2 above, each and every shipment of hazardous waste managed by Safety-Kleen shall be sampled for specific gravity in accordance with section 2.2.3.

2.2.3 Specific Gravity

A. Measurements of specific gravity to satisfy the section 2.2.2 Quantitative Testing requirements of this permit may be performed at either the customers location or at the Safety-Kleen facility.

B. Measurements of specific gravity to satisfy the section IV Quantitative Testing requirements of this permit shall be performed using only one of the following two methods: ASTM D891, Method A (Hydrometer) or ASTM D2111-71 (Hydrometer).

C. If the measured specific gravity of a waste is in the acceptable range, then Safety-Kleen may manage that waste.

If a drum of waste fails the specific gravity testing, it will be

sampled for further laboratory testing in accordance with the procedures described above in Section 2.2.1.a or Safety-Kleen will not accept the waste.

1. For spent mineral spirits solvent waste, the measured specific gravity must be within the range of .765 - .935 for the spent mineral spirits to be accepted by Safety-Kleen.
2. For spent immersion cleaner waste, the measured specific gravity must be within the following ranges for the spent immersion cleaner to be accepted by Safety-Kleen:
    a. The measured specific gravity for the aqueous phase must be within the range of .90 to 1.1 and the measured specific gravity for the solvent phase must be within the range of 1.125 to 1.375, for the spent immersion cleaner to be accepted.

2.2.4 Additional Testing

For any waste which fails either specific gravity testing or is determined to be contaminated based on laboratory analysis conducted pursuant to Section 2.2.1.a above, Safety-Kleen will perform quantitative testing at the next scheduled pick-up from the generator of such waste.

2.2.5 Initial and Annual Process Description and On-Site Audits

Based on historical operating and analytical records, Safety-Kleen has determined that the characteristics of its customers' waste streams do not change from year to year. Nearly 80% of our customers are in the automotive aftermarket, and our records of analyses of these customers'

wastes (particularly the last 10 years) reflect that there has, in fact, been a continuing reduction in the trace levels of EP toxic constituents in these wastes. Therefore, in lieu of costly initial and annual sampling and analyses of our customer's waste streams, Safety-Kleen will perform environmental audits at customer locations.

These audits will be performed for all new and existing customers and for all new customers. Revisions will also be made to the audit when it has been determined by the customer or is evident to the Safety-Kleen representative that a change has occurred in processes in which the solvent is used or generated. All such audits will be made part of the facility's RCRA Operating Record and will be retained on site.

2.2.6 QA/QC PLAN

2.2.6a Goal of Program

The analytical data collected by the service center personnel is intended to confirm the wastes collected may be safety managed onsite and that they match the descriptions on the accompanying manifest(s). Quality assurance and quality control will be followed as described in the appropriate test method(s) in SW-846.

2.2.6b Performance Evaluation of Personnel

Personnel who must sample and analyze wastes to do so at least annually.

2.2.6c Chain of Custody Procedures

Samples will be analyzed as they are collected, at the location where they are collected. Therefore, chain of custody paperwork will not be required. Records of analytical results (customer name, date sample was collected and analyzed and the analytical results) will be kept on file at the service center.

2.2.6d Use of Outside Laboratories

Outside laboratories may be used for sample collection and analyses. These laboratories must follow SW 846 methods for sampling, chain-of-custody and analyses (see tables D-1 through D-4). Samples must be disposed of or otherwise managed in accordance with 40 CFR 262, 263 and 264.

2.2.6e Analytical Results

Analytical results must be provided to the service center manager and he must keep these on file at the service 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. These wastes will only be handled on a transfer basis in accordance with 40 CFR 263.12.

The notice is required paperwork for all Safety-Kleen 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. A set of forms is in Appendix D.

2.6 OPERATING LOG

Safety-Kleen maintains an operating log on site which includes the following information as it becomes available:

1) A description and the quantity of each hazardous waste received, and the method and date of its storage as required by Pt. V. sec. 264, Appendix I;
2) The location of each hazardous waste within the facility and the quantity;
3) Records and results of waste analyses performed;
4) Summary reports and details of all incidents that require implementing the contingency plan;
5) Records and results of inspections;
6) Monitoring, testing or analytical data and corrective action where required;

7) For off-site facilities, Notices to generators as specified in 264.12(b);

8) All closure and post-closure cost estimates;

9) A certification by the permittee no less often than annually, that the permitter has a program in place to reduce the volume and toxicity of hazardous waste;

10) The land ban notices and requirements. These records are kept on file in the branch manager's office.

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 in both English and Spanish are 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. The container storage area is also locked unless occupied by Safety-Kleen personnel. As a result the tanks and container storage area are inaccessible except 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 on a daily basis. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked daily 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 weekly to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed weekly and the first aid kit and sorbents must be inspected weekly for adequate content and accessibility. A list of required emergency equipment is in Appendix E.

g. Security--The operation of each outside light, 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 and the joints are welded.

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 coating used on the floor and curbing is coated with a chemical-resistant epoxy and urethane so as to be impermeable to contain leaks and spills. The solvents in storage are only incompatible with strong oxidizers and reactive metals, none of which are present in the base or sealants.

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 are all placed on pallets(nine 16-gallon drums per pallet) to facilitate shipping and storage.

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, during the daily inspection, 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. Any extensive

repairs to the tank system will be assessed and certified by an independent engineer before the system is returned to use.

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

Because the facility is small, internal communication within the building and the solvent return/fill area is accomplished by voice. An alarm is located on the loading dock which alerts another employee in the warehouse that there may be a problem. 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 warehouseman.

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, explosion, 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 warehouseman 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. All releases, fires, and explosions necessitate the implementation of this contingency plan. Any situation that has the potential for releasing solvent or solvent vapors or causing a fire or explosion must be addressed in accordance with this plan. Should there be any questions as to whether this plan should be implemented (i.e. a problem is suspected but cannot be confirmed) the EHS and/or Technical Services Department must be contacted and assistance requested. 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 notify the New Mexico Health and Environment Department (HED) of any spill or release of hazardous waste within 24 hours (except for spills of one pound or less that are immediately cleaned up). The department will report to the New Mexico Health and Environment Department (HED) the following:

(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 30 days of the incident, Safety-Kleen will submit a written report on the incident to the New Mexico HED. The report will contain the information set out in Pt. V, S 264.196(d)(3) and 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:

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
New Mexico HED	Report releases, fires, and explosions.
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. An explosion proof area is one in which special wiring has been used. Only the return and fill station contains this type of wiring.

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 the spill is of a reportable quantity).

In the event a container needs emptying, a pump located on the facility will be used to remove the liquid and pump it to a new container. In the event liquid from a tank needs to be removed, tanker trucks will be

used to remove the liquid and haul it to the recycle center. A wet/dry vacuum is present at the site to be used in the event of a minor spill. Sorbent pads can also be used to wipe up any minor spills.

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.

Contaminated equipment resulting from remedial actions for spills must be cleaned and decontaminated. If it is a paved or metal surface, this can be done using a detergent solution.

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 and/or an explosion occurs, evacuate the facility and call the fire and police departments.

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.

f. Cool the area and containers with water until well after the fire has been extinguished.

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

Explosions may result in the spread of fire, unstable structures, and other hazardous conditions at the facility. Therefore, the site must not be re-entered until the fire department and Safety-Kleen's insurance company have determined it is safe to do so. Action must be taken to ensure that fires , explosions, or releases do not occur or reoccur. These include removing the source of the problem, repairing or remediating the source of the problem, coding areas subject to fires and explosions and replacing faulty equipment.

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

The emergency coordinator and his alternates have been trained using this contingency plan as well as in a classroom setting. They have references such as various state members at the corporate office and the Material Safety Data Sheets to help them make decisions during an emergency.

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. All employees at the facility have had training that satisfies the requirements of Pt. V, S 264.16. The persons listed on the resumes in Appendix G are personnel working for Safety-Kleen Environment, Health and Safety Department. All of these people provide input to Safety-Kleen training program and any of them may participate in the actual training. Robert Wachsmuth, regional environmental engineer, directly trains new branch managers. The branch manager, in turn, trains his employees. An employee may not work in an unsupervised position until he or she has received proper training as outlined in Appendix G.

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.

The branch manager is trained (see section 5.3.1) sufficiently that he is able to perform as a trainer himself, for his employees.

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.

e. participate in training new branch managers. Resumes for those employees responsible for training new branch managers are in Appendix G.

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. New employees must be completely trained within six months of starting work. 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. An employee may not work in an unsupervised position until he or she has received the training as outlined in Appendix G.

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. The regional environmental

engineer must insure that the program has been executed. 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. Employees may not work in unsupervised positions until the contingency plan has been reviewed and they understand emergency response procedures.

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 amounts which will be stored at this facility..

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. An outside contractor will be performing the closure clean up and sampling activities. The contractor will have worked with Safety-Kleen prior to clean up so we can be aware of their capabilities. A state licensed professional engineer will be on site periodically to certify the adequacy of the clean up activity.

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.

l. 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 tanks and piping shall be removed and disposed of at a properly permitted landfill. The final rinsate must be sampled and analyzed for volatile organic compounds to determine the cleanliness of the tank and its piping. If any volatile organic compounds are present above detection limits, the washing and rinsing must be repeated until they are no longer detectable.

d. The dike will be cleaned and razed. It will be disposed of at a properly permitted landfill.

e. Sample and analyze for mineral spirits and TCLP contaminants (except pesticides) beneath the tankfarm. If contamination is indicated, it will be confirmed with an extent of contamination soil study. The soil will be overexcavated or otherwise treated to eliminate the contamination. Soil samples must be collected and analyzed after cleanup to insure decontamination has been achieved.

f. 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 final rinsate will be analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If any volatile organic compounds are present, the washing and rinsing must be repeated until they are no longer detectable or to levels agreed upon with the EID. If any cracks are present soil samples must be collected from beneath the cracks and analyzed for volatile organic compounds. If contamination is present, a workplan must be developed to determine the extent of contamination and proper remedial action. 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 final rinsate must be analyzed for volatile organic compounds. If any are present above detection levels, the washing and rinsing must be repeated until they are no longer detectable. The clean dumpster and dock structure will be reused by Safety-Kleen or scrapped.

6.5 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Safety-Kleen will notify the Environmental Improvement Division (EID) at least 45 days in advance of known closure. Closure activities will begin within 30 days of receipt of the known last volume of hazardous waste. Within 90 days of receiving the known last 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.

APPENDIX A
PART A APPLICATION

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 (Expires ...)
OSA No. 0246-EPA-GT

For EPA Regional Use Only	EPA United States Environmental Protection Agency Washington, DC 20460	For State Use Only
Date Received Month Day Year	**Hazardous Waste Permit Application Part A** *(Read the Instructions before starting)*	

I. ID Number(s)

A. EPA ID Number	B. Secondary ID Number *(if applicable)*
NMD980698849	

II. Name of Facility

SAFETY-KLEEN CORP. (7-008-21)

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street: 4200A HAWKINS ROAD

Street *(continued)*:

City or Town	State	ZIP Code
FARMINGTON	NM	87409-

County Code *(if known)*	County Name
	SAN JUAN

B. Land Type *(enter code)*	C. Geographic Location LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*	D. Facility Existence Date Month Day Year
P	364420N	108141 1W	01011981

IV. Facility Mailing Address

Street or P.O. Box: 777 BIG TIMBER ROAD

City or Town	State	ZIP Code
ELGIN	IL	60123-

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(last)*	*(first)*
WACHSMUTH	ROBERT

Job Title	Phone Number *(area code and number)*
REG. ENV. ENGR.	708-697-8460

VI. Facility Contact Address *(See instructions)*

A. Contact Address Location	Mailing	B. Street or P.O. Box
	X	777 BIG TIMBER ROAD

City or Town	State	ZIP Code
ELGIN	IL	60123-

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
NMD980698849	

VII. Operator Information (see instructions)

Name of Operator			
SAFETY-KLEEN CORP.			
Street or P.O. Box			
777 BIG TIMBER ROAD			
City or Town	**State**	**ZIP Code**	
ELGIN	IL	60123-	
Phone Number (area code and number)	**B. Operator Type**	**C. Change of Operator Indicator**	**Date Changed**
708-697-8460	P	Yes [ ] No [X]	Month Day Year

VIII. Facility Owner (see instructions)

A. Name of Facility's Legal Owner			
COMET CORP.			
Street or P.O. Box			
1215 BRENTWOOD			
City or Town	**State**	**ZIP Code**	
FARMINGTON	NM	87401-	
Phone Number (area code and number)	**B. Owner Type**	**C. Change of Owner Indicator**	**Date Changed**
- -	P	Yes [ ] No [X]	Month Day Year

IX. SIC Codes (4-digit, in order of significance)

Primary		Secondary	
7389	(description) BUSINESS SERVICES, N.E.C.	5172	(description) PETROLEUM PRODUCT WHOLESALERS
Secondary		**Secondary**	
5084	(description) INDUSTRIAL MACHINERY & EQUIPMENT	5013	(description) AUTOMOTIVE PARTS & SUPPLIES

X. Other Environmental Permits (see instructions)

A. Permit Type (enter code)	B. Permit Number	C. Description

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
NMD980698849	

XI. Nature of Business (provide a brief description)

THIS FACILITY INCLUDES A LOCAL SALES/SERVICE OFFICE AND ACCUMULATION/DISTRIBUTION WAREHOUSE AND TANKS FOR SPENT SOLVENTS AND ANTIFREEZE (WHICH ARE RECLAIMED BY SAFETY-KLEEN AT A DIFFERENT LOCATION) AND PRODUCTS (WHICH INCLUDE SMALL PARTS CLEANING EQUIPMENT, SOLVENTS, ANTIFREEZE, HAND CLEANER, FLOOR SOAP AND OTHER ALLIED PRODUCTS). SAFETY-KLEEN COLLECTS THE SPENT SOLVENT AND ANTIFREEZE FROM ITS CUSTOMERS ON A PERIODIC BASIS AND ACCUMULATES IT, EITHER IN A STORAGE TANK OR IN A CONTAINER STORAGE AREA. THE MAJORITY OF SAFETY-KLEEN'S CUSTOMERS ARE CONDITIONALLY EXEMPT SMALL QUANTITY GENERATORS. ONCE A SUFFICIENT QUANTITY OF SPENT MATERIAL IS COLLECTED, A TANKER TRUCK OR BOX TRAILER TRUCK IS DISPATCHED FROM A SAFETY-KLEEN RECLAMATION FACILITY TO COLLECT THE WASTE AND BRING IT TO THE RECLAMATION FACILITY FOR ITS MANAGEMENT.

XII. Process - Codes and Design Capacities

A. **PROCESS CODE** - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in item XIII.*

B. **PROCESS DESIGN CAPACITY** - *For each code entered in column A, enter the capacity of the process.*

1. **AMOUNT** - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.*
2. **UNIT OF MEASURE** - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. **PROCESS TOTAL NUMBER OF UNITS** - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	DISPOSAL:	
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY
D80	LANDFILL	ACRE-FEET OR HECTARE-METER
D81	LAND APPLICATION	ACRES OR HECTARES
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	STORAGE:	
S01	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS
S02	TANK	GALLONS OR LITERS
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	TREATMENT:	
T01	TANK	GALLONS PER DAY OR LITERS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR
T04	OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
GALLONS PER HOUR	E
GALLONS PER DAY	U
LITERS	L
LITERS PER HOUR	H
LITERS PER DAY	V
SHORT TONS PER HOUR	D
METRIC TONS PER HOUR	W
SHORT TONS PER DAY	N
METRIC TONS PER DAY	S
POUNDS PER HOUR	J
KILOGRAMS PER HOUR	R
CUBIC YARDS	Y
CUBIC METERS	C
ACRES	B
ACRE-FEET	A
HECTARES	Q
HECTARE-METER	F
BTU's PER HOUR	K

Please print or type in the unshaded areas only.

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
NMD980698849	

XII. Process - Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Line Number		A. PROCESS CODE (from list above)			B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS			FOR OFFICIAL USE ONLY
X	1	S	0	2	600	G	0	0	2	
X	2	T	0	3	20	E	0	0	1	
	1	S	0	1	4,464	G	0	0	1	
	2	S	0	2	12,000	G	0	0	1	
	3									
	4									
	5									
	6									
	7									
	8									
	9									
1	0									
1	1									
1	2									

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in item XIII.

XIII. Additional Treatment Processes (follow instructions from Item XII)

Line Number (enter numbers in sequence with Item XII)	A. PROCESS CODE			B. TREATMENT PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
	T	0	4				
	T	0	4				
	T	0	4				
	T	0	4				

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only.

EPA I.D. Number (enter from page 1): MMD980698849

Secondary ID Number (enter from page 1):

XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES (1) PROCESS CODES (enter)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D001	5,180	T	S01 S02	
2	D004				INCLUDED WITH ABOVE
3	D005				INCLUDED WITH ABOVE
4	D006				INCLUDED WITH ABOVE
5	D007				INCLUDED WITH ABOVE
6	D008				INCLUDED WITH ABOVE
7	D009				INCLUDED WITH ABOVE
8	D010				INCLUDED WITH ABOVE
9	D011				INCLUDED WITH ABOVE
10	D018				INCLUDED WITH ABOVE
11	D019				INCLUDED WITH ABOVE
12	D021				INCLUDED WITH ABOVE
13	D022				INCLUDED WITH ABOVE
14	D023				INCLUDED WITH ABOVE
15	D024				INCLUDED WITH ABOVE
16	D025				INCLUDED WITH ABOVE
17	D026				INCLUDED WITH ABOVE
18	D027				INCLUDED WITH ABOVE
19	D028				INCLUDED WITH ABOVE
20	D029				INCLUDED WITH ABOVE
21	D030				INCLUDED WITH ABOVE
22	D032				INCLUDED WITH ABOVE
23	D033				INCLUDED WITH ABOVE
24	D034				INCLUDED WITH ABOVE
25	D035				INCLUDED WITH ABOVE
26	D036				INCLUDED WITH ABOVE
27	D037				INCLUDED WITH ABOVE
28	D038				INCLUDED WITH ABOVE
29	D039				INCLUDED WITH ABOVE
30	D040				INCLUDED WITH ABOVE
31	D041				INCLUDED WITH ABOVE
32	D042				INCLUDED WITH ABOVE
33	D043				INCLUDED WITH ABOVE

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
NMD980698849	

XIV. Description of Hazardous Wastes

A. **EPA HAZARDOUS WASTE NUMBER** - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. **ESTIMATED ANNUAL QUANTITY** - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. **UNIT OF MEASURE** - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. **PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of Item XIV-D(1).*
3. *Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).*

2. **PROCESS DESCRIPTION:** *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS (1) PROCESS CODES (enter)									D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1)
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

Type or print in the spaces provided. Use ELITE type, 12 characters per inch, in the unshaded areas only.

EPA I.D. Number (enter from page 1): MD980698849

Secondary ID Number (enter from page 1):

XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES (1) PROCESS CODES (enter)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F002	28	T	S01	
2	~~F003~~		~~T~~	~~S01~~	
3	~~F005~~				~~INCLUDED WITH ABOVE~~
4	F002	13	T	S01	
5	F004				INCLUDED WITH ABOVE
6					
7					
8					
9					
10					
11					
12					
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14					
15					
16					
17					
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33					

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. [illegible]

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
NMD980698849	

XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line Number	Additional Process Codes (enter)

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Owner Signature	Date Signed

Name and Official Title (type or print)
COMET CORP.

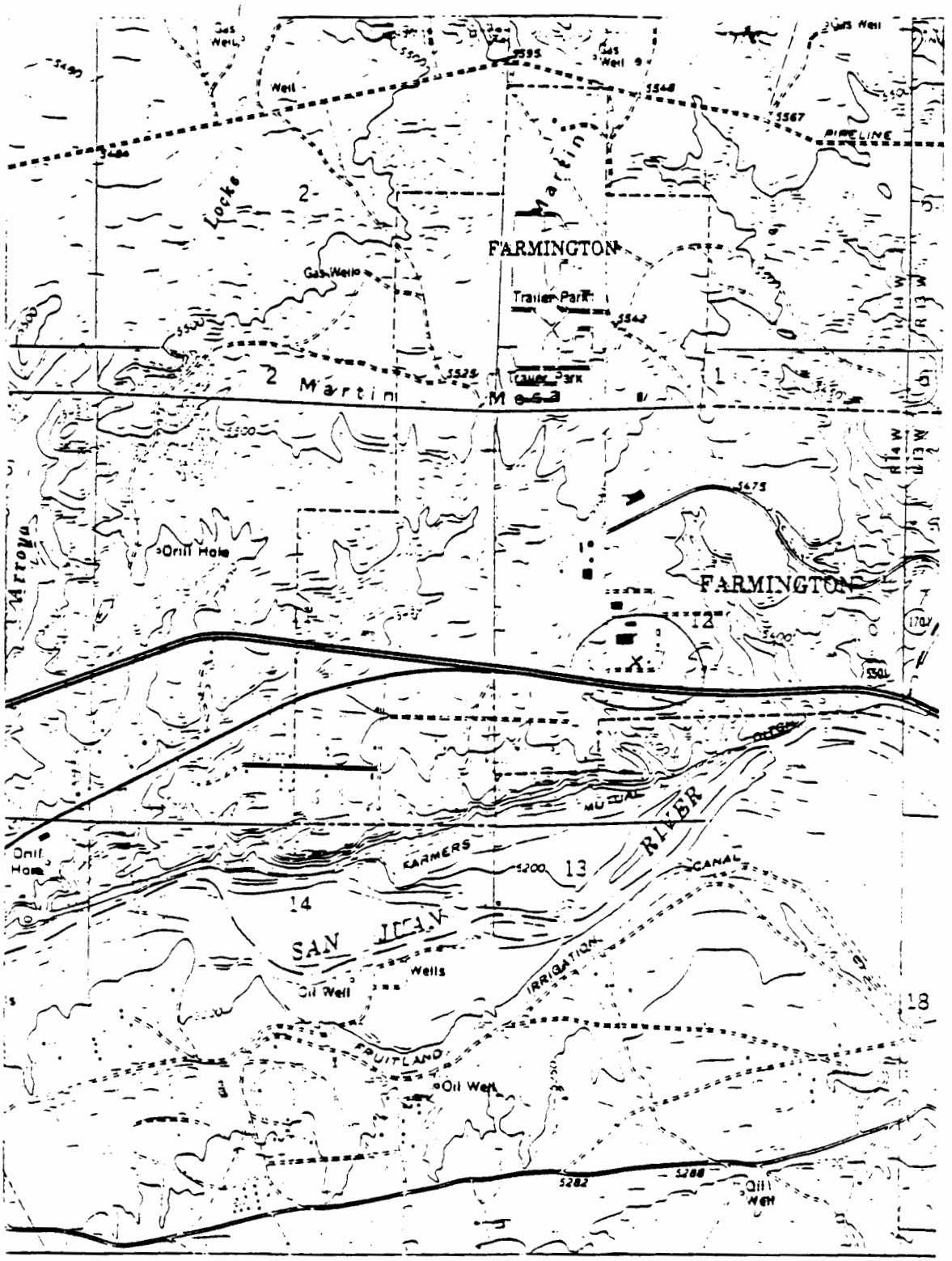
Operator Signature	Date Signed
[illegible]	4/3/[illegible]

Name and Official Title (type or print)
SCOTT E. FORE - VICE PRESIDENT, ENVIRONMENT, HEALTH AND SAFETY

XIX. Comments

The "F" waste streams listed on lines 1 and 4 on page 2 of 2 of Section XIV are also toxic characteristic. The waste codes listed on lines 2 through and including 33 on page 1 of 2 of Section XIV also apply to these wastes.

[illegible] completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)



SCALE 1:24 000

1 ½ 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

YOUNGS LAKE QUADRANGLE
NEW MEXICO-SAN JUAN CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

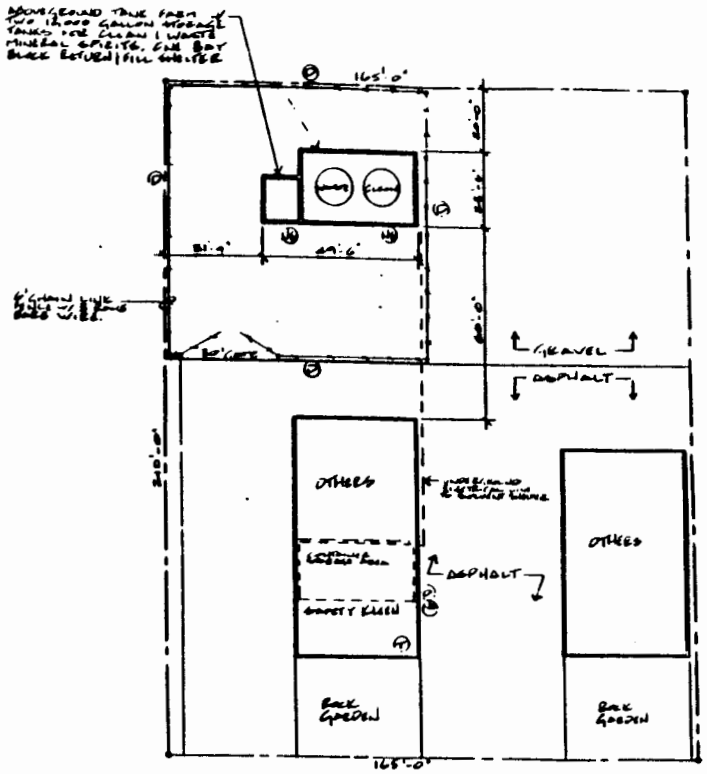
1963
PHOTOREVISED 1979
DMA 4357 IV SE-SERIES V881

KIRTLAND QUADRANGLE
NEW MEXICO-SAN JUAN CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

1966
PHOTOREVISED 1979
DMA 4357 III NE-SERIES V881

GN

1°36' 29 MILS 13° 231 MILS



HAWKIN LANE

SITE PLAN

SCALE 1"=20'

LEGEND:

- TELEPHONE
- LATE DISCHARGE (TYPICAL 5" S&C CLAS
- FIRST AID STATION
- "DANGER" SIGN
- "NO SMOKING" SIGN
- "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

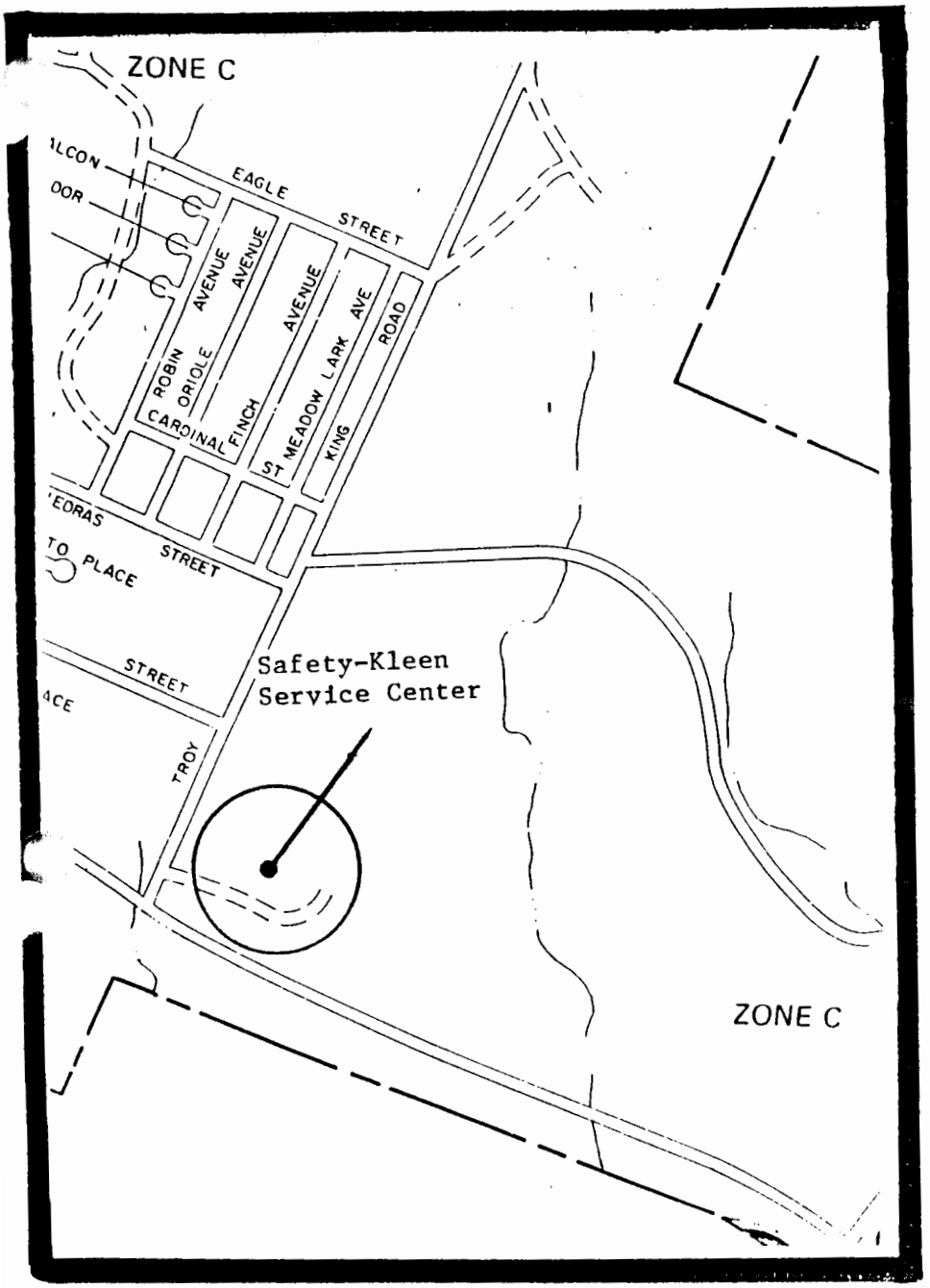
1	REVISION ADD LEGEND REQUIRED INFO BY BALL VRFY 9/88	KEY			12/88	

SITE PLAN
4200 HAWKIN LANE

SAFETY-KLEEN CORP.

1"=20'	KEY		7-1-88
FARMINGTON, N.M. 7-008-21	D13712		1

APPENDIX C
MAPS AND FACILITY DRAWINGS



KEY TO MAP

500-Year Flood Boundary	
100-Year Flood Boundary	ZONE B
Zone Designations*	
100-Year Flood Boundary	ZONE B
500-Year Flood Boundary	
Base Flood Elevation Line With Elevation In Feet**	513
Base Flood Elevation In Feet Where Uniform Within Zone**	(EL 987)
Elevation Reference Mark	RM7 ×
River Mile	• M1.5

**Referenced to the National Geodetic Vertical Datum of 1929

*EXPLANATION OF ZONE DESIGNATIONS

ZONE	EXPLANATION
A	Areas of 100-year flood; base flood elevations and flood hazard factors not determined.
AO	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; average depths of inundation are shown, but no flood hazard factors are determined.
AH	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; base flood elevations are shown, but no flood hazard factors are determined.
A1-A30	Areas of 100-year flood; base flood elevations and flood hazard factors determined.
A99	Areas of 100-year flood to be protected by flood protection system under construction; base flood elevations and flood hazard factors not determined.
B	Areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than one (1) foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the base flood. (Medium shading)
C	Areas of minimal flooding. (No shading)
D	Areas of undetermined, but possible, flood hazards.
V	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors not determined.
V1-V30	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined.

N

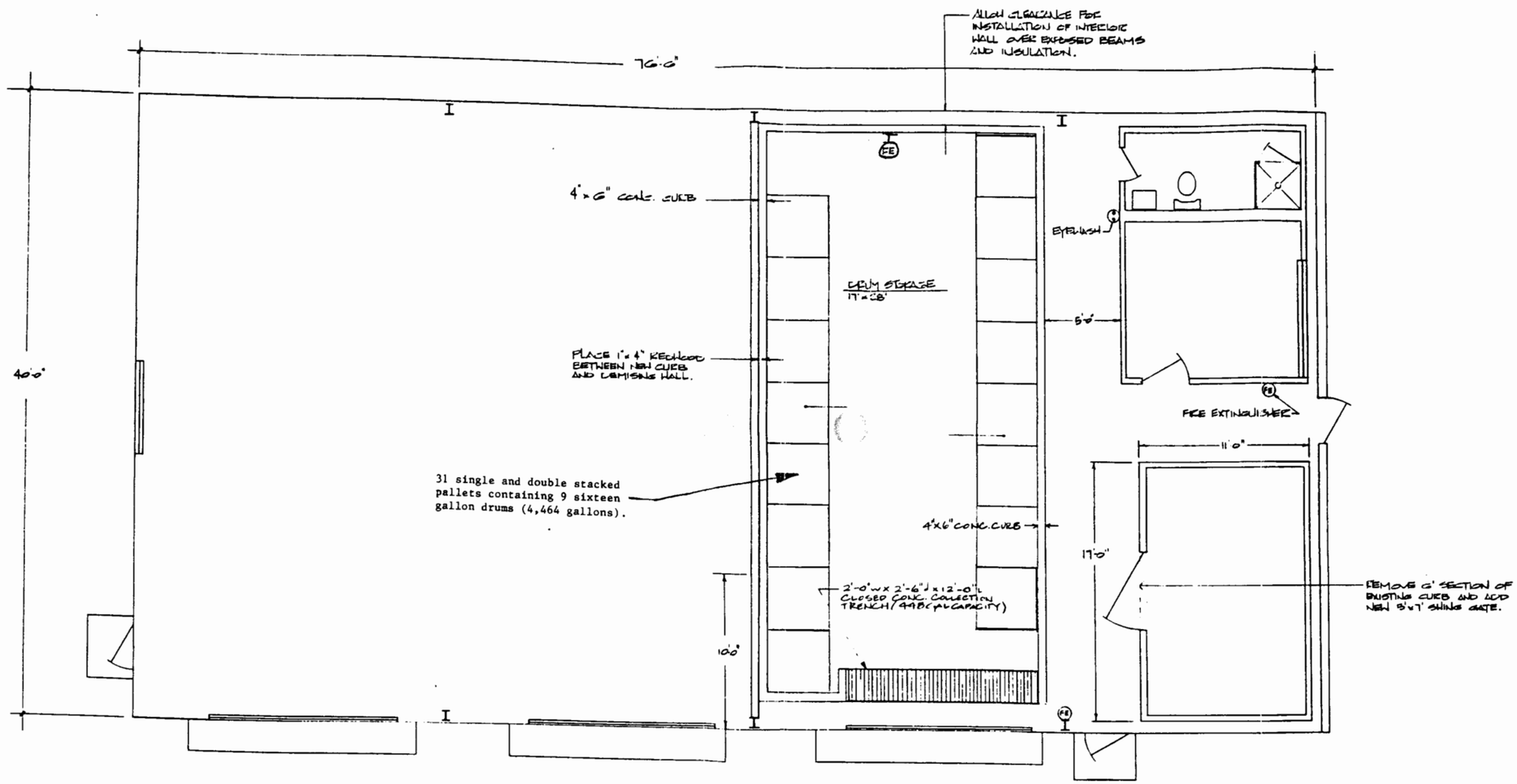
APPROXIMATE SCALE

1000 0 1000 FEET

FIRM
FLOOD INSURANCE RATE MAP

CITY OF
FARMINGTON, NEW MEXICO
SAN JUAN COUNTY

MAP REVISED:
DECEMBER 29, 1981



LEGEND:

- (T) (T) = TELEPHONE
- (FE) (FE) = FIRE EXTINGUISHER (TYPICAL 5# ABC CLASS)
- (FA) (FA) = FIRST AID STATION
- (D) (D) = "DANGER" SIGN
- (NS) (NS) = "NO SMOKING" SIGN
- (CS) (CS) = "CORROSIVE" SIGN

NEW — EXISTING

safety-kleen corp.

FLOORPLAN SHOWING VARIOUS IMPROVEMENTS TO BUILDING

SCALE 1/4" = 1'-0"	REVISIONS	BY	DATE
DATE 2-9-81	1 ADDED DRUM STORAGE		
DR. WEY			
APP.			

TITLE SATELLITE BRANCH FARMINGTON, N.M. (7008-21)

NO. D10239

APPENDIX D
ANALYTICAL DATA

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

Example of a manifest with Land Ban Notification

SAFETY-KLEEN CORP. P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761
STATE PRESCRIBED FORM State Form LPC 62 8/81 IL532-0610
5-034-53
NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH EPA Form 8700-22 (5-89) Form Approved. OMB No. 2050-0039 Expires 9-30-91

FOR SHIPPING AND SPILL

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD 981997210
Manifest Document No.: 39888
2. Page 1 of 1
Information in the shaded areas is not required by Federal law; but is required by Illinois law.

3. Generator's Name and Mailing Address: CONTINENTAL, 3135 N CLYBOURN, CHICAGO IL 60618-6424
Location If Different:
A. Illinois Manifest Document Number: IL 507234 MANIFEST FEE PAID
4. Generator's Phone (708) 000-0000
B. Illinois Generator's ID: 0316815010
5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 051060408
C. Illinois Transporter's ID: 1122
D. (708) 392-3880 Transporter's Phone
7. Transporter 2 Company Name
8. US EPA ID Number
E. Illinois Transporter's ID
F. ( ) Transporter's Phone
9. Designated Facility Name and Site Address: SAFETY-KLEEN CORP. 5-034-53, 306 CAMPUS DR, ARLINGTON HGTS, IL 60004
10. US EPA ID Number: ILD 000805929
G. Illinois Facility's ID: 0310090008
H. Facility's Phone: 708 392-3880

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ WASTE PERCHLOROETHYLENE ORM-A NA1897 (F002)(ERG #74)	005	DM	00035	1	EPA HW Number X X F002; Authorization Number 000003
b.					EPA HW Number X X; Authorization Number
c.					EPA HW Number X X; Authorization Number
d.					EPA HW Number; Authorization Number

NOTICE: IN accordance with 40 CFR 268.7, THE GENERATOR PROVIDES NOTICE THAT THE WASTE DESCRIBED AS 'WASTE PERCHLOROETHYLENE' IS A RESTRICTED WASTE. THE WASTE CONTAINS THE FOLLOWING CONSTITUENT WHOSE TREATMENT STANDARD IS NOTED: TETRACHLOROETHYLENE(0.05 PPM).

K. Handling Codes for Wastes Listed Above in Item #14
1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information: 9029 17553488 139888 5-034-53-2067 01
EMERGENCY RESP#1-708-888-4660
SKDOT# A: 506 B: C: D:

16. GENERATOR'S 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.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.
Printed/Typed Name: T. L HANG Signature: Date: Month 07 Day 13 Year 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: DEAN HOWARD Signature: Date: Month 07 Day 13 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Signature: Date: Month Day Year

Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Signature: Date: Month Day Year

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

GENERATOR TRANSPORTER FACILITY

COPY 4. TRANSPORTER 1 COPY

If a spill call the Illinois Office of Emergency Response at 217/782-7637 and the National Response Center at 800/424-8802 or 202/426-2675.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: Safety-Kleen Corp.. (Designated Facility) EPA ID NO.: _____ (Designated Facility)

_____ (Address)

Option A: Under manifest number _____, of sales/service acknowledgement number _____, the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted from land disposal. A copy of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

Option B: I am a small quantity generator (100-1,000 kg/mo). This notice covers all wastes shipped under the following Machine Placement and/or Customer Owned Machine Service (CMS) Contract(s): _____ A copy of this notice will be filed with the contract(s) for five (5) years beyond their termination.

(Check boxes that apply) Waste Name	EPA Waste Code	The Waste May Contain the following Restricted Constituents	Treatment Standard (mg/l) or Method
☐ Waste Petroleum Naphtha	0001	Ignitable liquid	incineration, fuel substitutions or recovery.
		Halogenated organic compounds (above 1000 mg/l) may include:	See individual standards per 40 CFR 268.41(a)
		-Methylene chloride	0.96
		-Tetrachloroethylene	0.05
		-Toluene	0.33
		-1.1.1 trichloroethane	0.41
		-Trichloroethylene	0.091
		-Xylene	0.15
☐ Waste Petroleum Naphtha (sludges from Safety-Kleen Service Center Operations)	0001, 0006, 0008	All of the above, plus: -Cadmium	0.14
		-Lead (low lead subcategory)	0.51
☐ Waste Compound Cleaning Liquid/ Immersion Cleaner	F002, F004	Cresylic Acid	0.75
		1,2-dichlorobenzene	0.125
		Methylene choloride	0.96
☐ Waste Perchloro-ethylene	F002	Tetrachloroethylene	0.05
☐ Waste Trichloro-trifluoroethane	F002	Trichlorotrifluoroethane	0.96
☐ Waste Trichloro-ethane	F002	Trichloroethane	0.41
☐ Waste Paint Related Material	F005, F003, 0001, 0006, 0008	Acetone	0.59
		Methyl Ethyl Ketone	0.75
		Methyl Isobutyl Ketone	0.33
		Toluene	0.33
		Xylene	0.15
		Cadmium	0.14
		Chromium	0.094
		Lead (low-lead subcategory)	0.51
		Ignitable liquid	incineration, fuel substitution or recovery

---

The constituent composition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical(s) used, and the process which created the waste).

Generator Name: _____ EPA ID#: _____

Generator Signature: _____ Date: _____

Printed Name and Title of Representative: _____

Safety-Kleen Corp. manages the above wastes through its recycling and fuels programs in accordance with all applicable elements of the land disposal restrictions

2.2.4 RECEIPT ANALYSIS - "CLOSED LOOP" AND "INDUSTRY SPECIFIC" WASTES

This subsection outlines the analysis to which the waste solvents from the various Safety-Kleen Corp. businesses are subjected for receipt control. The receipt control logic is summarized in flow charts and discussed below for each major type of solvent. Solvents received from "closed loop sources" include parts washer solvent, immersion cleaner solvent, gun cleaner solvent and other similar solvents. Solvents received from "industry specific sources" include such solvents as dry cleaner solvent and used oil.

2.2.4.1 PARTS WASHER SOLVENT

The Parts Washer Services is a "Closed Loop" service in which Safety-Kleen Corp. provides equipment and a solvent exchange service. In these services, Safety-Kleen Corp. provides the equipment and clean solvent, takes back the spent solvent, recycles the solvent and returns the recycled solvent back to the service. Hence, the term "closed loop". Customers using this service include automobile dealers, auto repair shops, garages, fleet maintenance shops, manufacturers of automobiles, trucks, airplanes, heavy and light manufacturing equipment, and other businesses. The parts washer machine is used for a specific purpose, to clean and degrease parts, in specific locations and is serviced by a Safety-Kleen representative on a scheduled basis. Because of the integrity of this service and its uniform use, the contaminants, e.g. oil, grease, carbon deposits, in parts washer solvent are of a consistent nature. Analytical data is renewed and updated as material is received and processed.

Parts washer solvent is petroleum naphtha with a nominal flash point of 105°F. The boiling range of this petroleum fraction is typically 315-400°F. It is commonly referred to as "Mineral Spirits" or "Stoddard Solvent".

The predominance of waste parts washer solvent is received in bulk at the recycle centers. The remainder of the waste parts washer solvent is received in drums.

For bulk receipts, a sample is taken before unloading and sent to the laboratory for analysis. While analysis is underway, the material is unloaded into a settling tank where it is held until the analysis results are available. For receipts of containerized parts washer solvent, the drums are emptied into a vat and pumped into a dedicated mineral spirits settling tank. Settling tanks are used to isolate a batch of receipts and to begin the recovery process of separating emulsion, water and sediments. Bulk shipments and settling tank samples are both analyzed as follows:

Primary Tests:	Flashpoint - Verify greater than 90°F PCB Analysis
Secondary Tests:	Volatile Organic Analysis Physical Appearance Specific Gravity pH Bottoms Sediment and Water (BS&W) Distillation Performance

If the results of the analyses meet the acceptance criteria, the laboratory releases the material in the settling tank to be processed. The recovered parts washer solvent is returned to the Safety-Kleen Corp. service centers for reuse by Safety-Kleen Corp. customers.

If the particular acceptance criteria for parts washer solvent are not met, a determination will be made as to what processing technology is required. The material will then be processed accordingly.

2.2.4.2 IMMERSION CLEANER SOLVENT

The immersion cleaner service is another "Closed Loop" service. In these services, Safety-Kleen Corp. provides the equipment and clean solvent, takes back the spent solvent, recycles the solvent and returns the recycled solvent back to the service. Hence, the term "closed loop". The immersion cleaner solvent or carburetor and cold parts cleaner solvent is used mainly to clean carburetors and this is used by automobile dealers, auto repair shops, garages and fleet maintenance operations. The immersion cleaner machine is used for a specific purpose, in specific locations and is serviced by a Safety-Kleen representative on a scheduled basis. Because of the integrity of this service and its uniform use, the contaminants in immersion cleaner solvent are of a consistent nature. Analytical data is renewed and updated as material is received and processed.

The waste immersion cleaner is typically received in drums from the Safety-Kleen Corp. service centers. These containers are normally the 16-gallon steel drums used by the generator (customer). Upon receipt, each load of drums is kept together. The drums are emptied into a vat and pumped into a dedicated immersion cleaner settling tank. The settling tank isolates a batch of receipts.

If a bulk shipment of waste immersion cleaner is received from another Safety-Kleen Corp. recycle center, the bulk shipment is sampled before unloading. Bulk shipments and settling tank samples are both analyzed as follows:

Primary Tests:	Flash Point PCB Analysis
Secondary Tests:	Physical Appearance Specific Gravity pH % Water Distillation Performance Volatile Organic Analysis

The settling tank is released for processing if the analytical results meet the acceptance criteria. The recovered Immersion Cleaner is returned to the Safety-Kleen Corp. service centers for distribution and reuse by Safety-Kleen Corp. customers.

If the particular acceptance criteria for immersion cleaner solvent are not met, a determination will be made as to what processing technology is required. The material will then be processed accordingly, which may include transportation to another processing facility.

2.2.4.4 DRY CLEANER SOLVENT

The dry cleaner service provided by Safety-Kleen Corp. consists of a waste service for collection of dry cleaner still bottoms, filter cartridges, and filter media from filters used to purify the dry cleaning solvent during usage. From these wastes, Safety-Kleen Corp. recovers high purity perchloroethylene (tetrachloroethylene) via evaporation and fractional distillation. As part of the overall service, Safety-Kleen Corp. sells recycled perchloroethylene and new filters to the dry cleaners.

This is an "industry specific" service which is well characterized. The waste generated by the dry cleaning industry consists of waste solvent, still bottoms, filter cartridges and filter media. The solid residue which Safety-Kleen separates from the solvent is recycled and contains metal, paper, activated carbon and oils. The solvent-containing waste received from the dry cleaning industry is predominantly perchloroethylene (tetrachloroethylene). The typical volatile organic content is 80% perchloroethylene, 15% mineral spirits, and 5% more volatile solvents. Safety-Kleen Corp. annually services approximately 15,000 customers; collecting 40,000,000 pounds of dry cleaner wastes for processing. The data and characterization of this material acquired to date, provides adequate knowledge of the material to safely manage it.

Safety-Kleen Corp. confirms the Volatile Organic Analysis characterization of the waste material by sampling and analyzing an in-process sample of distillate after distillation. The crude distillate is further refined by fractional distillation to produce high quality solvent.

Primary Tests:	Physical Appearance Volatile Organic Analysis
Secondary Tests:	Specific Gravity pH PCB Analysis - GC (Residue Extract)

The recovered solvent, perchloroethylene, is sold by Safety-Kleen Corp. directly to the dry cleaning industry and other users of this solvent.

Sampling Devices

Each waste stream sample was collected with a new/dedicated thief sampler, or hand-held ladle. Forceps were used to sample filter material. In some cases sampling devices were custom made, using clean PVC conduit, glass or plastic containers, rigid steel wire, and duct tape. The samplers were either discarded after each use or decontaminated by washing with a biodegradable solution and rinsed with tap water in order to prevent cross-contamination of waste stream samples.

Sample Handling

The waste stream samples were immediately transferred to containers provided by Continental Analytical Services, Inc., Salina, Kansas. Each sample was appropriately labeled and packed on ice in an opaque cooler. Chain-of-custody/sample-analysis-request forms accompanied the samples to the laboratory. The sample coolers were secured and shipped to the laboratory via the regional bus service.

WASTE ANALYSIS PLAN

ANALYSES OF SPENT MINERAL SPIRITS

Sample Date	Sample ID	Sample Description	Fl. Pt. (^{o}C)	Cd (mg/l)	Cr (mg/l)	Pb (mg/l)
9-27-89	314 SMS	Spent Mineral Spirits	42	0.38	< 0.04	1.1
9-29-89	315 SMS	Spent Mineral Spirits	38	2.1	0.8	15
10-2-89	313 SMS	Spent Mineral Spirits	40	0.8	< 0.4	10

WASTE ANALYSIS PLAN

ANALYSES OF TANK BOTTOM SEDIMENT

Sample Date	Sample ID	Sample Description	Fl. Pt. (°C)	Cd (mg/l)	Cr (mg/l)	Pb (mg/l)
9-27-89	314 TB	Mineral Spirits Tank Bottom Sediment	37	0.22	<0.04	0.9
9-29-89	315 TB	Mineral Spirits Tank Bottom Sediment	45	0.66	<0.04	0.7

WASTE ANALYSIS PLAN

ANALYSES OF SPENT IMMERSION CLEANER

Sample Date	Sample ID	Sample Description	Cresylic Acid (mg/l)	1,2-Dichlorobenzene (mg/l)	Methylene Chloride (mg/l)
9-27-89	314 IC	Used Immersion Cleaner	13,000	3,300	9,700
9-29-89	315 IC	Used Immersion Cleanet	92,000	280,000	210,000
10-2-89	313 IC	Used Immersion Cleaner	94,000	276	10,000
12-27-89	314b IC	Used Immersion Cleaner	20,000	40,000	660,000
12-27-89	315b IC	Used Immersion Cleaner	21,000	39,000	390,000
1-23-90	SIC (ED)	Used Immersion Cleaner	210,000	360,000	100,000

WASTE ANALYSIS PLAN

ANALYSES OF DRY CLEANER WASTES

Sample Date	Sample ID	Sample Description	Flash Point (°C)	Perchloro-ethylene (mg/L)	Mineral Spirits (mg/L)
9-29-89	315 SP	Dry cleaning wastes PCE	--	420,000	--
1-23-90	331 SB	Dry cleaning wastes PCE still bottoms	--	330,000	--
1-23-90	331 FP	Dry cleaning wastes PCE filter powder	--	15,000	--
1-23-90	331 F	Dry cleaning wastes PCE cartridge filter material	--	390,000	--
1-23-90	331 MSSB	Mineral spirits dry cleaning waste still bottom	48	--	710,000
2-8-90	331 MSFP	Mineral spirits dry cleaning waste filter powder	38	--	860,000
1-23-90	331 MSF	Mineral spirits, dry cleaning waste cartridge filter material	34	--	440,000

TABLE D-1

PARAMETERS AND RATIONALE
FOR HAZARDOUS WASTE ANALYSES
AT THE SAFETY-KLEEN
RECYCLE CENTER

Hazardous Waste	Parameter	Rationale
Used Mineral Spirits	Flash Point TCLP ANALYSIS	Ignitable characteristic (D001). Lead content = 5 ppm (D008).
Mineral Spirits Tank Bottom Sediment and Free Water	Flash Point TCLP ANALYSIS	The sediment has a flash point of less than 140°F (D001) and the sediment and free water may contain cadmium and lead at greater than TCLP regulations
Used Immersion Cleaner	Methylene Chloride Orthodichlorobenzene Cresylic Acid TCLP ANALYSIS	Formula contains these components: F002 and F004.
Dry Cleaning Wastes	Perchloroethylene TCLP ANALYSIS	Contain this component (F002).

TABLE D-2

PARAMETERS AND TEST METHODS
AT THE SAFETY-KLEEN
RECYCLE CENTER

Parameter	Test Method	Reference
Flash Point	Setaflash closed cup tester	U.S. EPA Method 1020 (ASTM Method D327-78) or an equivalent method
TCLP	TCLP ANALYSIS	U.S. EPA Method or an equivalent method
Hydrocarbons and Volatile Organics	Gas Chromatography (GC)	U.S. EPA Methods 8010, 8015, 8020 and 8120 or equivalent methods

TABLE D-3

METHODS USED TO SAMPLE HAZARDOUS WASTES
AT THE SAFETY-KLEEN
RECYCLE CENTER

Hazardous Waste	Description of Sampling Method	Reference for Sampling	Sampler*
1. Used Mineral Spirits	Sampling a tank "Samples & Sampling procedures for Hazardous Waste Streams" EPA-600/2-80-018	Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods, SW846, U.S. EPA Section 1.2.1.1	For tanks-Coliwasa Tube
2. Mineral Spirits Tank Bottom Sediment and free water	Same as number 1	Same as number 1	Same as number 1
3. Used Immersion Cleaner	Sampling a drum "Samplers & Sampling" procedures for Hazardous Waste Streams" EPA-600/2-80-018	Same as number 1	Representative composite sample using a Coliwasa tube
4. Dry Cleaning Wastes	Same as number 3	Same as number 1	Same as number 3

* The Coliwasa tube will be used for all liquid samples.

TABLE D-4

FREQUENCY OF ANALYSIS
AT THE SAFETY-KLEEN
RECYCLE CENTER

Hazardous Waste	Analysis	Frequency
Used Mineral Spirits	Flash Point TCLP ANALYSIS	Flash Point/every load TCLP ANALYSIS / AT LEAST ANNUALLY
Mineral Spirits Tank Bottom Sludge and Free Water	Flash Point TCLP ANALYSIS	Flash Point/every load TCLP ANALYSIS / AT LEAST EVERY LOAD
Used Immersion Cleaner	Methylene Chloride Orthodichlorobenzene Cresylic Acid TCLP ANALYSIS	Every load
Dry Cleaning Wastes	GC Scan (U.S. EPA Methods 8010, 8015 and 8020) TCLP ANALYSIS	Every load

APPENDIX E
EQUIPMENT INFORMATION

INSPECTION LOG SHEET FOR: Daily Inspection of STORAGE TANK SYSTEM

INSPECTOR'S NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

	MON	TUES	WED	THURS	FRI
DATE:(M/D/Y)					
TIME:					

STORAGE TANKS:
(TANKS MUST NEVER BE MORE THAN 95% FULL!)

Volume in Product Tank (in./gal.)					
Volume in Second Product Tank (in./gal.)					
Volume in Waste Tank (in./gal.)					
Volume in Second Waste Tank (in./gal.)					

Tank Exterior	A* N	A N	A N	A N	A N

If 'N', circle appropriate problem: rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other: _____

High Level Alarms	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: malfunctioning "Power On" light, malfunctioning siren/strobe light, other: _____

Volume Gauges	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: disconnected, sticking, condensation, other: _____

CONTAINMENT AREA (Tank Dike):

Bottom and Walls	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots/stains, deterioration, displacement, leaks, other: _____

Self-closing Drain Valve	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: open, leaks, other: _____

Rigid Piping and Supports	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: distortion, corrosion, paint failure, leaks, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

INSPECTION LOG SHEET FOR: Daily Inspection of STORAGE TANK SYSTEM

INSPECTOR'S NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

	MON	TUES	WED	THURS	FRI
TRANSFER PUMPS AND HOSES					
Pump Seals	A* N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, other: _____					
Motors	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: overheating, other: _____					
Fittings	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, other: _____					
Valves	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, sticking, other: _____					
Hose Connections and Fittings	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: cracked, loose, leaks, other: _____					
Hose Body	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: crushed, cracked, thin spots, leaks, other: _____					
RETURN AND FILL STATION					
Wet Dumpster	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: excess sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, other: _____					
Secondary Containment	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: excess sediment/liquid, leaks, deterioration, distortion, excess debris, other: _____					
Loading/Unloading Area	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: cracks, ponding/wet spots, deterioration, other: _____					

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

storage area.

DESCRIPTION OF AREA (e.g., metal shelter, northeast corner of warehouse, etc.): _____

PERMITTED STORAGE VOLUME: _____

INSPECTOR'S NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

	MON	TUES	WED	THURS	FRI
DATE:(M/D/Y)					
TIME:					
CONTAINERS:					
Number/Volume* of M.S. Waste Drums:					
Number/Volume of I.C. Waste Drums:					
Number/Volume of Dry Cleaning Waste Drums:					
Number/Volume of Dry Cleaning Waste Boxes:					
Number/Volume of Paint Waste Drums:					
Number/Volume of Paint Waste Pails:					
TOTAL VOLUME (IN GALLONS):					
	A**N	A N	A N	A N	A N

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted, other: _____

Condition of Drums/Boxes	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion, other: _____

Stacking/Placement/Aisle Space	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, other: _____

CONTAINMENT:

Curbing, Floor and Sump(s)	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, other: _____

Loading/Unloading Area	A N	A N	A N	A N	A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

* To calculate total volumes, use the following: M.S., I.C., D.C. and paint waste drums hold 16 gallons; D.C. boxes hold 10 gallons and paint waste pails hold 5 gallons.

**A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

INSPECTION LOG SHEET FOR: Weekly Inspection of SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES AND MISCELLANEOUS EQUIPMENT

INSPECTOR'S NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

DATE OF INSPECTION (Month/Day/Year): _____

TIME OF INSPECTION: _____

SAFETY AND EMERGENCY EQUIPMENT

Fire Extinguishers: A* N

If 'N', circle appropriate problem: overdue inspection, inadequately charged, inaccessible, other: _____

Eyewash and Shower: A N

If 'N', circle appropriate problem: disconnected malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain leaking, other: _____

First Aid Kit: A N

If 'N', circle appropriate problem: inadequate inventory, other: _____

Spill Cleanup Equipment: A N

If 'N', circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other: _____

Personal Protection Equipment: A N

If 'N', circle appropriate problem: inadequate supply of aprons, gloves, glasses, respirator, other: _____

SECURITY DEVICES:

Gates and Locks: A N

If 'N', circle appropriate problem: sticking, corrosion, lack of warning signs, fit, other: _____

Fence: A N

If 'N', circle appropriate problem: broken ties, corrosion, holes, distortion, other: _____

MISCELLANEOUS EQUIPMENT:

Dry Dumpster: A N

If 'N', circle appropriate problem: rust, corrosion, split seams, distortion, deterioration, excess debris, liquids in unit, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

_____

_____

_____

_____

_____

*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT

APPENDIX F
EMERGENCY INFORMATION

EMERGENCY INFORMATION

A. Facility Emergency Coordinator / Alternate Coordinator

	Facility Emergency Coordinator	Alternate Coordinator
Name:	Rick McDonald	Homer Manning
Home Address:	201 E. Gladden Farmington, NM 87401	P.O. Box 5801 Farmington, NM 87499
Telephone:	Office: 505/327-9070 Home: 505/326-3075	505/327-9070 505/325-1110

B. Emergency Notification Phone Number

a. Internal :

Safety-Kleen Environment, Health and Safety Department
24 Hour Emergency Number: 708/888-4660

b. External :

1. National Response Center
   24 Hour Emergency Number: 800/424-8802

2. New Mexico Health and Environment Dept.
   505/827-9329

C. Emergency Team to be Notified

	UNIT	TELEPHONE NUMBER
a.	Farmington Fire Dept.	505/327-0222
b.	Farmington Police Dept.	505/325-3501
c.	San Juan County Regional Medical Center	505/325-5011
d.	Rinchem	505/345-3655

EMPLOYEES' FUNCTIONS DURING AN EMERGENCY

Employee	Title	Emergency Function
Rick McDonald	Branch Manager	Emergency Coordinator Notify Environmental Affairs Department Notify Emergency Agencies, if necessary.
		Retain, contain or slow the flow of solvent
		Shut off electricity
Homer Manning	Warehouseman	Alternate Emergency Coordinator Follow Emergency Coordinator instructions if he is unavailable

ATTACHMENT A

EMERGENCY EQUIPMENT LIST

The following equipment shall be located in the locker room area and the supply checked monthly:

Gloves - The rubber or plastisol gloves sold by Safety-Kleen are to be used when handling the solvents. Three pairs of gloves are located in the spill response kit. Two dozen gloves are kept in storage.

Safety Glasses or Face Mask - Whichever the worker prefers, is to be worn when loading or unloading the solvent. The worker is to wear glasses at all times. Two pairs of glasses are kept in the spill response kit. One pair of glasses is hanging on the loading dock.

Plastic Aprons - Are available for the situations where a solvent may get on the worker's clothing. Two aprons are located in the spill response kit. Five plastic aprons are kept in storage. One apron is located at the loading dock and another is on the route truck.

Decontamination of all equipment is accomplished by washing with soap and water.

Eye Wash Stand---Normally the eye wash is located centrally at the Service Center. At larger centers, several eye wash stands are provided. The workers should try the stand and be familiar with its operation. The eye wash stand should be checked once a week for operation.

Showers---Should be checked periodically to ascertain that they are operational. Located in locker room area.

Ventilation---Any area that is closed and collects vapors should be avoided or equipped with proper fans to insure adequate ventilation.

Fire Extinguisher---Each center should have a minimum of two 10-pound ABC extinguishers, located at the points where solvents are transferred. An ABC extinguisher is a universal system used on paper, wood and electrical, as well as solvent fires. The extinguishers must be full and carry an inspection tag. The accepted extinguisher is available as S-K part no. 4009. The Farmington facility has three 10 lbs. fire extinguishers located on an enclosed floor plan map. Another 5 lbs. fire exinguisher is located on the route truck.

Absorbent Material---An adequate supply (200 sheets, 2 bales) should be on hand to handle small spills. Located in the loading and unloading area and warehouse. S-K Part No. 8890. One bale is located with the spill response kit, on the loading dock and on the route truck. Two bales of absorbant material are kept in storage.

Communication System--- Telephones are installed at all facilities, normally in the branch office and facilities are to have an emergency telephone or "panic button" installed near the dump and fill dock

Over-flow alarm--- Over-flow alarms are installed in all storage tanks. They are set to activate at 95% tank capacity and have both a horn and flashing light alarm.

APPENDIX G
TRAINING INFORMATION

PERSONNEL RECORD

Facility Location: Farmington, New Mexico
Facility Number:
E.P.A. I.D. Number:

Employee Name:	Position:*	Start Date:	Termination Date:
Dave Rockwell	Branch Manager		
Rick McDonald	Branch Operations Manager Sales Representative Emergency Coordinator		
Homer Manning	Warehouseman Alternate Emergency Coordinator		

* 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.

INTRODUCTORY AND

ANNUAL TRAINING TOPICS FOR FACILITY EMPLOYEES

A. Environmental Regulation Update

B. Part A Application

C. Waste Analysis Plan (including waste determination procedures as described in the waste analysis plan)

D. Preparedness and Prevention Plan (including proper waste handling techniques)

E. Contingency Plan and Emergency Procedure - all of Chapter 4 and Appendix F of the Part B permit application, including:

   a. Procedures for using, inspection, repairing, and replacing facility emergency response equipment must be reviewed.
   b. Communications or alarm systems.
   c. Response to fires or explosions.
   d. Response to groundwater contamination incidents.
   e. Shutdown of operations.

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 BEEN TRAINED. 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.: _____

Facility 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, 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.

	TRAINING TOPIC*	DATE COMPLETED	SIGNATURE
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.

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 (including proper waste handling techniques)
   Contingency Plan - all of chapter 4 and Appendix F of the Part B permit application including:

   a. Procedures for using, inspection, repairing, and replacing facility emergency and monitoring equipment.
   b. Communications or alarm systems.
   c. Response to fires or explosions.
   d. Response to groundwater contamination incidents.
   e. Shutdown of operations.

   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.
- Review waste management methods specific to this facility.

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.

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.

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.

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

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

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

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

JEFFREY A. WILLIS

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

Education: Master of Science, Environmental Science,
Indiana University (1988)

Bachelor of Science, Biology
Northern Michigan University (1985)

Employment Experience:

Regional Environmental Engineer,
Safety-Kleen Corp.
March 1990 - Present

Environmental Scientist/ Project Manager
PEI Associates, Inc.
May 1988 - March 1990

Training Experience:

Region V Federal/State Environmental
Regulations Conference (September 1988

Region IV Technical Systems Audit Course
January 1990

RESUME

JANE E. MAIER

Position: Regional Environmental Engineer - Northwest
Safety-Kleen Corp.

Education: M.S. Civil Engineering, Univ. of Pennsylvania (1984)

B.S. Civil Engineering, Univ. of Pennsylvania (1983)

Employment Experience:

Regional Environmental Engineer
Safety-Kleen Corp.
(May, 1990 - present)

Environmental Engineer, Regulatory & Permitting Specialist
CH2M Hill, Inc.
(August 1985 - April 1990)

Environmental Engineer - Compliance
U.S. EPA Region VI
(July 1984 - July, 1985)

Additional Training:

RCRA Hazardous Waste Seminar
(April 1988)

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

40 Hour Hazardous Waste Training
(March 1985 and yearly refresher)

CPR & First Aid
(April 1985 and refresher, as required)

EIT Pennsylvania
Untangling the Web of Professional Liability
September, 1986

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

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

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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

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Safety-Kleen Corp.

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Employment Experience:

Environmental Engineer,
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Senior Environmental Engineer, Ecology and Environment
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Project Engineer, Aquatechnics, Inc.
September, 1978 - June, 1980

Project Engineer, RJN Environmental Associates, Inc.
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Designer, Illinois Central Gulf Railroad
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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)

NAME Richard MacDonald DATE 10-4-90

EMPLOYEE NUMBER 3612 BRANCH NUMBER 7-008-21

ENVIRONMENTAL, HEALTH AND SAFETY SERIES

"THE WASTE ANALYSIS PLAN"

Introduction

Safety-Kleen has provided more than 400,000 customers with a solvent collection and reclamation service. Over 43 million gallons of spent solvent was reclaimed in 1989.

Objectives Of This Video Tape

After viewing this video, the individual should be able to:

1. Know what to look for when inspecting spent solvent.
2. Know the characteristics of the waste streams discussed in the video.
3. Know the types of material that can contaminate solvent.
4. Know the procedures to follow if solvent contamination is detected.

Major Points of the Video

1. Safety-Kleen currently offers four services which involve the accumulation and storage of spent solvents.
   - *Parts Cleaner Service*
   - *Paint Refinishing Service*
   - *Fluid Recovery Service*
   - *Dry Cleaning Service*
2. The purpose of a Waste Analysis Plan is to insure that the waste received matches the description on the manifest.
3. Possessing sufficient information on the properties of waste fluids enables Safety-Kleen to properly control the treatment, storage, and disposal of the waste so no threat to human health or the environment occurs.

Major Points (Cont'd)

21. Characteristics of lacquer thinner are:
    - *Clear liquid*
    - *Flammable, with a flash point of below 20 degrees F.*
    - *Comprised mainly of acetone and ethanol*
22. Color is not used as an acceptance criteria because paint waste can be any color.
23. Never risk injury by "sniffing" waste material.

View The Video

TURN ON THE VIDEO AND VIEW THE TAPE. IF YOU DO NOT FULLY UNDERSTAND THE MAJOR POINTS AFTER THIS TAPE IS VIEWED, REPLAY THE TAPE. WHEN FINISHED, COMPLETE THE REVIEW QUESTIONS AND SEE YOUR MANAGER.

Review Questions:

Circle the correct answer for the following statements:

1. A drum of spent mineral spirits should contain about _____ of the original amount.

   A. 25% B. 50% C. 75% D. 100%

2. Safety-Kleen's Waste Analysis Plan operates as a _____ system.

   A. Closed loop B. Regulated C. Open loop D. Independent

3. A predictable and consistent waste stream is referred to as a _____ waste stream.

   A. Generic C. Toxemia

   B. Homozygote D. Homogeneous

4. An on-site inspection of spent solvent solvent includes monitoring the:

   A. Odor B. Color C. Consistency D. Volume

   E. A-D

5. The flash point of clean, recycled mineral spirits is:

   A. 150° F. B. 105° F. C. 180° F. D. 90° F.

NAME Richard MacDonald DATE 10-4-90

EMPLOYEE NUMBER 3612 BRANCH NUMBER 7-008-21

WASTE ANALYSIS PLAN
MODULE REVIEW QUIZ

Circle the correct answer for each of the following statements.

1. The purpose of a Waste Analysis Plan is to insure that the waste received matches the description on the:

   A. Bill of lading
   B. Pre-ship analysis
   C. Manifest
   D. Invoice

2. When the customer uses our solvents, _____ can potentially occur.

   A. Theft
   B. Contamination
   C. Flow-through
   D. Viscosity

3. To check the odor of a solvent, you should "sniff" it.

   TRUE FALSE

4. Safety-Kleen's original I.C. formula is classified as a:

   A. Toxic
   B. Irritant
   C. Inflammable
   D. Corrosive

5. Mineral spirits is classified as a (an):

   A. Inflammable
   B. Toxic
   C. Ignitable
   D. Halogen

(Continued on opposite side)

WASTE ANALYSIS PLAN
MODULE REVIEW QUIZ (Cont'd)

6. The addition of one percent of gasoline to a 30 gallon drum of mineral spirits can lower the flashpoint by:

   A. 20° F. B. 75° F. C. 0° F. D. 5° F.

7. If a deviation from what is standard or normal is noted, the waste:

   A. Should be picked up
   B. Must be left at the customer's location
   C. Should be turned over to the FRS division
   D. Should be reported to the state EPA

8. At the recycle centers, wastes are always analyzed for metals content.

   TRUE FALSE

9. A drum of waste solvent that has more than its original volume can be taken back to the branch.

   TRUE FALSE

10. Potential contaminants of mineral spirits include:

   A. Water
   B. Gasoline
   C. Chlorinated solvents
   D. Paint thinner
   E. Sediment/heavy material
   F. All of the above

Name Richard macDonald Date 10-4-90

Employee Number 3612 Branch Number 7-008-21

ENVIRONMENTAL, HEALTH AND SAFETY SERIES

CHEMISTRY OF SAFETY-KLEEN PRODUCTS

Introduction

This video has been produced to help you understand the properties and industrial applications of chemical solvents useful to Safety-Kleen. Important aspects covering the potential hazards of these chemicals will also be discussed.

Objectives Of This Video Tape

After viewing this tape, you will be able to:

1. Define "hydrocarbon compound",
2. Identify the major source of hydrocarbon compounds,
3. List several uses of hydrocarbon compounds,
4. Define chlorinated compounds,
5. Describe the health and safety differences between hydrocarbons and chlorinated compounds,
6. Identify Small Quantity Generator Chemicals that are useful in the Safety-Kleen Fluid Recovery System,
7. Name the two primary methods of disposal that Safety-Kleen uses.

- *Dry Cleaner Solvents*
  - ✓ *perchloroethylene*
  - ✓ *1, 1, 1 -trichloroethane*
  - ✓ *mineral spirits*
  - ✓ *trichlorotrifluroethane*
- *Paint gun cleaner*
  - ✓ *acetone*
  - ✓ *toluene*
  - ✓ *methyl ethyl ketone (MEK)*

View The Video

TURN ON THE VIDEO AND VIEW THE TAPE. IF YOU NOT FULLY UNDERSTAND THE MAJOR POINTS AFTER THIS TAPE IS VIEWED, REPLAY THE TAPE. WHEN FINISHED, COMPLETE THE REVIEW QUESTIONS AND SEE YOUR MANAGER.

Review Questions

For each statement, circle "True" if the statement is true and "False" if the statement is false.

1. Chlorinated compounds were formed several million years ago in the earth.

   TRUE FALSE

2. Chlorinated compounds are fire hazards.

   TRUE FALSE

3. One of the two major methods of disposal used by Safety-Kleen is landfilling.

   TRUE FALSE

4. Fractional Distillation is a process used on crude oil that separates mixtures of compounds into groups of chemicals with similar boiling points.

   TRUE FALSE

5. Acetone, toluene and MEK are three hydrocarbon compounds used in our Paint Gun Cleaner.

   TRUE FALSE

Name Richard macDonald Date 10-4-90

Employee Number 3612 Branch Number 7-008-21

CHEMISTRY OF SAFETY-KLEEN PRODUCTS

MODULE REVIEW Quiz

Select from the following terms to complete the statements below.

Acute	Hydrocarbons
Chlorinated	Lead
Chlorine	Petroleum
Chronic	Pigment
Fire	Solvents
Fractional Distillation	Synthetically

1. The major source of modern day solvents comes from Petroleum
2. Hydro Carbons are chemicals composed of only the elements Carbon and Hydrogen.
3. Crude oil is separated into useful components by a process called fractional Distillation
4. Hydrocarbon compounds present a Fire hazard.
5. Chlorinated compounds contain the element Chlorine.
6. Esters, ketones, and ethers are all used as Solvents in many printing and painting operations.
7. A Pigment is the component of printing inks that leaves a permanent design.
8. The dry cleaning industry uses large quantities of chlorinated compounds for cleaning fabrics.
9. Chlorinated compounds can present chronic health hazards from prolonged contact.
10. Chlorinated compounds are produced Synthetically

NAME Jamer S. Manning DATE 10-4-90

EMPLOYEE NUMBER 2167 BRANCH NUMBER 7-008-21

ENVIRONMENTAL, HEALTH AND SAFETY SERIES

"THE WASTE ANALYSIS PLAN"

Introduction

Safety-Kleen has provided more than 400,000 customers with a solvent collection and reclamation service. Over 43 million gallons of spent solvent was reclaimed in 1989.

Objectives Of This Video Tape

After viewing this video, the individual should be able to:

1. Know what to look for when inspecting spent solvent.
2. Know the characteristics of the waste streams discussed in the video.
3. Know the types of material that can contaminate solvent.
4. Know the procedures to follow if solvent contamination is detected.

Major Points of the Video

1. Safety-Kleen currently offers four services which involve the accumulation and storage of spent solvents.
   - *Parts Cleaner Service*
   - *Paint Refinishing Service*
   - *Fluid Recovery Service*
   - *Dry Cleaning Service*
2. The purpose of a Waste Analysis Plan is to insure that the waste received matches the description on the manifest.
3. Possessing sufficient information on the properties of waste fluids enables Safety-Kleen to properly control the treatment, storage, and disposal of the waste so no threat to human health or the environment occurs.

Major Points (Cont'd)

21. Characteristics of lacquer thinner are:
    - *Clear liquid*
    - *Flammable, with a flash point of below 20 degrees F.*
    - *Comprised mainly of acetone and ethanol*
22. Color is not used as an acceptance criteria because paint waste can be any color.
23. Never risk injury by "sniffing" waste material.

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Review Questions:

Circle the correct answer for the following statements:

1. A drum of spent mineral spirits should contain about _____ of the original amount.

   A. 25% B. 50% C. 75% D. 100%

2. Safety-Kleen's Waste Analysis Plan operates as a __A__ system.

   A. Closed loop B. Regulated C. Open loop D. Independent

3. A predictable and consistent waste stream is referred to as a __D__ waste stream.

   A. Generic C. Toxemia

   B. Homozygote D. Homogeneous

4. An on-site inspection of spent solvent solvent includes monitoring the:

   A. Odor B. Color C. Consistency D. Volume

   E. A-D

5. The flash point of clean, recycled mineral spirits is:

   A. 150° F. B. 105° F. C. 180° F. D. 90° F.

NAME Homer S. Manning DATE 10-4-90

EMPLOYEE NUMBER 2167 BRANCH NUMBER 7-008-21

WASTE ANALYSIS PLAN
MODULE REVIEW QUIZ

Circle the correct answer for each of the following statements.

1. The purpose of a Waste Analysis Plan is to insure that the waste received matches the description on the:

   A. Bill of lading (C) Manifest
   B. Pre-ship analysis D. Invoice

2. When the customer uses our solvents, _____ can potentially occur.

   A. Theft C. Flow-through
   (B) Contamination D. Viscosity

3. To check the odor of a solvent, you should "sniff" it.

   TRUE (FALSE)

4. Safety-Kleen's original I.C. formula is classified as a:

   A. Toxic C. Inflammable
   B. Irritant (D) Corrosive

5. Mineral spirits is classified as a (an):

   A. Inflammable (C) Ignitable
   B. Toxic D. Halogen

(Continued on opposite side)

WASTE ANALYSIS PLAN
MODULE REVIEW QUIZ (Cont'd)

6. The addition of one percent of gasoline to a 30 gallon drum of mineral spirits can lower the flashpoint by:

   A. 20° F. B. 75° F. C. 0° F. D. 5° F.

7. If a deviation from what is standard or normal is noted, the waste:

   A. Should be picked up

   B. Must be left at the customer's location

   C. Should be turned over to the FRS division

   D. Should be reported to the state EPA

8. At the recycle centers, wastes are always analyzed for metals content.

   ~~TRUE~~ USM FALSE

9. A drum of waste solvent that has more than its original volume can be taken back to the branch.

   TRUE ~~FALSE~~

10. Potential contaminants of mineral spirits include:

    A. Water

    B. Gasoline

    C. Chlorinated solvents

    D. Paint thinner

    E. Sediment/heavy material

    F. All of the above

Name Howard S. Manning Date 10-4-90

Employee Number 2167 Branch Number 7.008.21

ENVIRONMENTAL, HEALTH AND SAFETY SERIES

CHEMISTRY OF SAFETY-KLEEN PRODUCTS

Introduction

This video has been produced to help you understand the properties and industrial applications of chemical solvents useful to Safety-Kleen. Important aspects covering the potential hazards of these chemicals will also be discussed.

Objectives Of This Video Tape

After viewing this tape, you will be able to:

1. Define "hydrocarbon compound",
2. Identify the major source of hydrocarbon compounds,
3. List several uses of hydrocarbon compounds,
4. Define chlorinated compounds,
5. Describe the health and safety differences between hydrocarbons and chlorinated compounds,
6. Identify Small Quantity Generator Chemicals that are useful in the Safety-Kleen Fluid Recovery System,
7. Name the two primary methods of disposal that Safety-Kleen uses.

- *Dry Cleaner Solvents*
  - ✓ *perchloroethylene*
  - ✓ *1, 1, 1 -trichloroethane*
  - ✓ *mineral spirits*
  - ✓ *trichlorotrifluroethane*
- *Paint gun cleaner*
  - ✓ *acetone*
  - ✓ *toluene*
  - ✓ *methyl ethyl ketone (MEK)*

View The Video

TURN ON THE VIDEO AND VIEW THE TAPE. IF YOU NOT FULLY UNDERSTAND THE MAJOR POINTS AFTER THIS TAPE IS VIEWED, REPLAY THE TAPE. WHEN FINISHED, COMPLETE THE REVIEW QUESTIONS AND SEE YOUR MANAGER.

Review Questions

For each statement, circle "True" if the statement is true and "False" if the statement is false.

1. Chlorinated compounds were formed several million years ago in the earth.

   TRUE (FALSE)

2. Chlorinated compounds are fire hazards.

   (TRUE) FALSE

3. One of the two major methods of disposal used by Safety-Kleen is landfilling.

   TRUE (FALSE)

4. Fractional Distillation is a process used on crude oil that separates mixtures of compounds into groups of chemicals with similar boiling points.

   ~~TRUE~~ HSM (FALSE)

5. Acetone, toluene and MEK are three hydrocarbon compounds used in our Paint Gun Cleaner.

   ~~TRUE~~ HSM (FALSE)

Name Homer S. Manning Date 10-4-90

Employee Number 2147 Branch Number 7-008-21

CHEMISTRY OF SAFETY-KLEEN PRODUCTS

MODULE REVIEW Quiz

Select from the following terms to complete the statements below.

Acute	Hydrocarbons
Chlorinated	Lead
Chlorine	Petroleum
Chronic	Pigment
Fire	Solvents
Fractional Distillation	Synthetically

1. The major source of modern day solvents comes from Petroleum
2. Hydrocarbons are chemicals composed of only the elements Carbon and Hydrogen.
3. Crude oil is separated into useful components by a process called Fractional Distilla.
4. Hydrocarbon compounds present a Fire hazard.
5. Chlorinated compounds contain the element Chlorine
6. Esters, ketones, and ethers are all used as Solvents in many printing and painting operations.
7. A Pigment is the component of printing inks that leaves a permanent design.
8. The dry cleaning industry uses large quantities of Chlorinated compounds for cleaning fabrics.
9. Chlorinated compounds can present Chronic health hazards from prolonged contact.
10. Chlorinated compounds are produced Synthetically

APPENDIX H
FINANCIAL REQUIREMENTS

safety-kleen

Director
New Mexico Environmental Improvement Division
P.O. Box 968
Santa Fe, NM 87504-0968

Dear Sir:

I am the chief financial officer of Safety-Kleen Corp., 777 Big Timber Road, Elgin, Illinois, 60123. This letter is in support of this firm's use of the financial test to demonstrate financial assurance as specified in the New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and post-closure care is demonstrated through the financial test specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: total per attached listing - closure $100,000; post-closure $78,000.

2. This firm guarantees, through the corporate guarantee specified New Mexico Hazardous Waste Management Regulations Part II 206.C.3 and 206.D.3, the closure and post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: closure $689,320; post-closure $0.

3. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care is not demonstrated either to the New Mexico Environmental Improvement Division through the financial test or any other financial assurance mechanism specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: total per attached listing - closure $6,629,450; post-closure $1,618,700.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the Saturday closest to December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 30, 1989.

(con't)

777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708/697-8460 FAX 708 697-4295

Alternative I

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the three paragraphs on the previous page)	$ 9,115,470
*2.	Total liabilities	$277,372,000
*3.	Tangible net worth	$224,858,000
*4.	Net worth	$260,630,000
*5.	Current assets	$139,143,000
*6.	Current liabilities	$ 82,040,000
*7.	Net working capital (line 5 minus line 6)	$ 57,103,000
*8.	The sum of net income plus depreciation, depletion, and amortization	$ 80,040,000
*9.	Total assets in U.S.	$449,400,000

		YES	NO
10.	Is line 3 at least $10 million?	X	
11.	Is line 3 at least 6 times line 1?	X	
12.	Is line 7 at least 6 times line 1?	X	
*13.	Are at least 90% of firm's assets located in the U.S.?		X
14.	Is line 9 at least 6 times line 1?	X	
15.	Is line 2 divided by line 4 less than 2.0?	X	
16.	Is line 8 divided by line 2 greater than 0.1?	X	
17.	Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in New Mexico Hazardous Waste Management Regulations, Part II 206.D.3.j.(6) as such regulations were constituted on the date shown immediately below.

Robert W. Willmschen
Vice President - Finance

March 10, 1990
RWW/pz