

Attn: Rick McDonald / Dave Morgan

Please note the enclosed pages from the revised Farmington Permit which are to be excluded. These include sections 2.2.2 thru and including 2.2.6 (a-e). Explain to Dave Morgan that when I was revising the Farmington Waste Analysis plan, I was using the approved EPA region III waste analysis plan as a basis for New Mexico. Anyway, I accidentally included the section on quantitative testing which only is required at a certain facility out East in New Mexico. Safety-Kleen will continue to perform waste analyses (fingerprinting) at the recycle facility, and visual inspections. Tell Mr. Morgan he can call me to discuss this further and that I am very sorry for this mess up. I also have some other information concerning the type of waste analyses performed at the recycle facility he requested.

Thanks so much
Jennifer M. Zschebae
x2227

P.S. I went skiing in Taos last week. Beautiful place, great snow, you're lucky to live in such a neat state 😊
We have a wind chill of 0°F now. Yuck

2.2.6c Chain of Custody Procedures

Delete

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

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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

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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

Keep included
↓ ↓

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. The

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 OA/OC PLAN

Delete

2.2.6a Goal of Program

The analytical data collected by the service center personnel is intended to confirm the wastes collected may be safely 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.

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

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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

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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'

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

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- 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

- 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

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

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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: