



State of New Mexico  
**ENVIRONMENT DEPARTMENT**

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MEMORANDUM

DATE: April 2, 1991

TO: Judith Espinosa  
Secretary  
Environment Department

THROUGH: *BAG* Benito Garcia  
Bureau Chief  
Hazardous & Radioactive Waste Bureau

*KWS* Kathleen Sisneros  
Director  
Waste and Water Management Division

FROM: Elizabeth Gordon *EG*  
Permitting Supervisor  
Hazardous & Radioactive Waste Bureau

RE: Operating permit for Safety-Kleen Farmington Service Center

Hazardous Waste Units and Waste Managed at the Safety-Kleen Service Center

Safety-Kleen collects spent cleaning solvents of three different types from its customers and ships these solvents to a recycling facility for reclamation and eventual return to customers as clean solvents. The three kinds of solvents are 1) mineral spirits, used primarily by automotive and equipment-repair businesses; 2) an immersion cleaner containing methylene chloride, cresylic acid, and other solvents and surfactants, also primarily used by mechanical repair businesses; and 3) fabric dry-cleaning solvents, composed almost entirely of perchloroethylene. These solvents are stored at the Safety-Kleen facility until truckload quantities are accumulated, at which time they are shipped to a recycling facility.

The permit describes the structures, equipment, and procedures Safety-Kleen will use to store hazardous waste in containers and in a 12,000-gallon aboveground tank in compliance with the New Mexico Hazardous Waste Management Regulations. The containerized wastes will be stored in containers that meet or exceed the requirements of the Department of Transportation, and will be stored only in an area

equipped with secondary containment capable of containing leaked or spilled waste. The tank system is also equipped with secondary containment. The permit includes a waste analysis plan, a security plan, an inspection plan, a training plan, a description of waste handling procedures, a contingency plan, and a closure plan.

#### Changes to the Draft Permit

Comments were received from Safety-Kleen, Hazardous and Radioactive Waste Bureau, Occupational Safety and Health Bureau and the U.S. Environmental Protection Agency; none was received from the general public. None of the comments required a major change to the permit and those made are detailed in the responses-to-comments letter which is attached. Most of the changes were to clarify conditions. The major request from Safety-Kleen itself was that the test parameters and test methods be removed from Permit Attachment A: Waste Analysis Plan. As indicated in the response, that cannot be done. The regulations require these. Additionally, we are not requiring any verification sampling be done at the Service Center itself. Rather it is being done at the regional recycling center in Texas. Requiring the testing outlined in the Waste Analysis Plan is our means of ensuring that the Service Center gets the information it needs on the wastes for proper storage.

The responses to the comments from OSHA are extensive. They have just begun to review our permits and we need to assure them that the RCRA permits do address their concerns. In the future, we will have them review the permit application, rather than the draft permit, so that we can address their concerns earlier in the process.

#### Recommended Action

The Hazardous Waste and Radioactive Bureau recommends that the permit be issued.