

June 25,1993 RPW 93-195

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Barbara Hoditschek, Manager RCRA Permit Program State of New Mexico Environment Department Harold Runnels Building 1190 St. Francis Drive, P.O. Box 26110 Sante Fe, New Mexico 87502

RE: NMD 980698849 Safety-Kleen Corp. Farmington NM. Class I Modifications

Dear Ms. Hoditscheck:

Per recent telephone conversations with Marc Sides of your staff I am submitting Class I modifications to our existing permit:

1. Changing the Safety-Kleen corporate office address.(see revised pages 1 and the Contingency Plan Abstract pages)

2. Add the Contingency Plan Abstract pages to make it a stand alone document.

3. Change the mailing address for the Farmington facility.(see revised pages 1 and the Contingency Plan Abstract pages)

4. Change the owner of the property for the facility(see revised pages 1 and the Contingency Plan Abstract pages)

5. The references to our containers for color and drum sizes we want deleted. (see revised pages 3,4,12,14,15,19,20,21,34,and 35)

6. In section 2.6 we want to change the reference to operating log to operating record.(see revised page 28)

7. The outdoor lighting turns on at low light hours of the day instead of twenty four lighting as was stated.(see revised page 30 and 31.



8. The regional environmental engineer or regional manager must review the facility inspection records at least three times per year instead of the regional manager doing it four times per year.(see revised page 32)

9. The alternate emergency coordinator will be a trained employee designated by the emergency coordinator instead of the warehouseman.(see revised pages 40 and 41)

10. The emergency information sheet in Appendix F has been revised.

11. The field spill report form has been revised and should be put into Appendix F and page 49.

12. The facility inspection sheets have been revised and should be out into Appendix E.

Since these are all Class I modifications to the permit, we will need the mailing list to send the notification of these minor changes. Marc Sides also told me there would be a fee to make these changes.

If you have any questions please call me at 303-322-7328.

Sincerely,

Robert Wachsmuth Environmental Engineer

cc: J. Bard 7-008-01 File 1020

FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS: Safety-Kleen Corp. <u>1000 Randall Road</u> <u>Elgin, IL 60123-7857</u> 708/697-8460

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

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

FACILITY ADDRESS: Safety-Kleen Corp. (7-008-21) <u>4210 A Hawkins Rd.</u> Farmington, New Mexico 87401

TELEPHONE NUMBER: 502/327-9070

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

GEOGRAPHIC LOCATION:⁰ 36 44' 20" N 108 14' 11" W

OWNER: J.D. Kinsey Farmington, New Mexico 87401 303/884-2602, 505/325-3743 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.

CONTINGENCY PLAN ABSTRACT

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(Note: This page and the following page have been copied from Section 1.0 (Facility Description) for informational purposes:

- Safety Kleen Corp. CORPORATE HEADQUARTERS: 1000 Randall Road Elgin, IL. 60123-7857 708/697-8460 **RESPONSIBLE OFFICIALS:** David A. Dattilo Vice President, Sales and Service Scott E. Fore Vice President, Environmental, Health and Safety FACILITY ADDRESS: Safety-Kleen Corp. (7-008-21) 4210 A Hawkins Rd. Farmington, New Mexico 87401 TELEPHONE NUMBER: 502/327-9070 U.S. EPA I.D. NUMBER NMD980698849 36°44′20" N GEOGRAPHIC LOCATION: 108° 14′ 11" W J.D. Kinsey OWNER: Farmington, New Mexico 87401 303/884-2602, 505/325-3743 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.

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FACILITY TYPE:	:	Storage in an aboveground tank (S02) and in containers (S01)		
Storage Unit	Capacity (Gal.)	Secondary Containment(ga]	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	446.8	Spent Immersion Cleaner (F002, F004 and the codes listed in the note below) and Dry Cleaning Waste (F002 and the codes listed in the note below)	

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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, amd D043

1.0 FACILITY DESCRIPTION

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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 drum <u>which meets Department of</u> <u>Transportation(DOT) requirements(typically a 16- or 30 gallon drum)</u> contains 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

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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 container <u>which</u> <u>meets DOT requirements</u> 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 customerowned 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 container <u>which meets DOT</u> <u>requirements(typically a 16 gallon drum)</u> 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.

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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. <u>Spent material is poured into the dumpsters in the return and fill station</u>, 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 $37' \times 22' \times 3'$ 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. <u>The wastes are not mixed while on site and</u> <u>different wastes are segregated according their contents</u>. 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.

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2.0 WASTE ANALYSIS PLAN

2.1 DESCRIPTION OF WASTES

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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 <u>only</u> 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. <u>Containers of spent material</u> 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. <u>Bottom sediment in the tank</u>--Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A

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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 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). 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 drums <u>which meet DOT requirements</u>. The drums are then palletized, stacked twohigh 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

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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

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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. 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 19

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

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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. If the volume of waste exceeds the specified level 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

B. New Immersion Cleaner

Same

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

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

1. Spent Filter Cartridges

Spent Filter cartridges are placed in <u>a container that meets DOT requirements</u>. 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

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

- 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
- 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 RECORD

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Safety-Kleen maintains an operating <u>record</u> 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;
- 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;

PREPAREDNESS AND PREVENTION PLAN

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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 outdoor lighting on sensoring devices at low light hours of the day

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.

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3.0 PREPAREDNESS AND PREVENTION PLAN

<u>3.1 SECURITY MEASURES</u>

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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. <u>In</u> <u>addition, outdoor lights are on sensoring devices that activate at low light.</u>

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 <u>outside of the return and fill dock</u>. 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 environmental engineer or regional manager must review the Facility Inspection Record with the branch manager at least three times per year to insure that they are properly completed and that any necessary repairs have been effected.

The facility inspection includes the following:

- a. <u>Tank inspections</u>--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. <u>Drum storage areas</u>--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

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3.3.1 Tank Storage

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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 polyethylene and steel drums, <u>both of which meet DOT</u> requirements. The drums have been treated with fluorine gas to be resistant to dry cleaning solvents and they are all placed on pallets to facilitate shipping and storage.

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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

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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. <u>Pouring of drummed solvent into the dumpster</u>--<u>As the contents of the drums are</u> <u>poured into the dumpster</u>, 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 shutoff 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. <u>Moving of containers</u>--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

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. <u>The</u> <u>alternate emergency coordinator is</u>

a trained employee designated to this position by the emergency coordinator.

EMERGENCY NOTIFICATIONS:

Farmington Police Department505/327-0222Farmington Fire Department505/325-3501San Juan County Regional Medical Center505/325-5011Environment, Health and Safety Department708/888-4660New Mexico Health and Environment Dept.505/827-9329Rinchem505/345-3655

505-883-4232(24 hour central security)

4.0 CONTINGENCY PLAN

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

4.1 PURPOSE

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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 <u>and the alternate</u> <u>emergency coordinator is trained employee designated to this position by the branch manager</u>.

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

A. FACILITY EMERGENCY COORDINATOR - ALTERNATE COORDINATOR

NAME: CHARLIE GUYER	DAN DEE
HOME & DDRESS: 309 TAYLOR DR.	#20 YUCCA HEIGHTS
FARMINGTON, N.M.	BECLABITO, N.M.
87401	87420

TELEPHONE:

OFFICE:	505-327-9070	505-327-9070
HOME:	505-326-6710	-
PAGER:	505-326-9315 Days	505-326-9315 Nights

B. EMERGENCY NOTIFICATION PHONE NUMBERS

a. Internal:

Saflety Kleen Environmental Affairs Department 24 HOUR EMERGENCY NUMBER: 708-888-4660

- b. External
 - 1. DOT National Response Center 24 HOUR EMERGENCY NUMBER: 1-800-424-8802
 - New Mexico Health and Environmental Department Environmental Improvement Division Hazardous Waste Bureau
 HOUR EMERGENCY NUMBER: 505-827-9329

C. EMERGEN, Y TEAM TO BE NOTIFIED

UNIT		TELEPHONE NUMBERS		
a.	Fargington Fire Department	911 or (Non Emergency 505-325-3501) or (Non Emergency 505-327-7701)		
b.	Farmington Police Department	911 or (Non Emergency 505-327-7701)		
c.	, San Øuan County Regional Medical Center	911 or (Non Emergency 505-325-5011)		
d.	Rin chem	505-345-3655 or 505-883-4242 24 HOUR (Central Security) 505-766-0939 24 HOUR (Pager Number for Gary Michaelson)		
ē.	Poiton Control Center	1-800-432-6866		





May 27, 1992 RPW 92-184

Dr. Herb Grover Permit Group Coordinator New Mexico Environment Department Hazardous and Radioactive Materials Bureau Harold Runnels Building 1190 St. Francis Drive Sante Fe, NM. 87502

RE: Safety-Kleen Corp. 2720 Girard NE Albuquerque, NM 87107 EPA I.D. NMD000804294

Dear Dr. Grover:

As a followup to our recent telephone conversation, we have started operation the new underground tanks and flammable storage building. We submitted to you the required assessments and drawings within the required time frames of the storage permit. Since your department didnot inspect the facility within the fifteen days as stated in permit condition I.E.12.a. and I.E.12.b. we have commenced operation of the tanks and flammable storage building along with the return and fill area.

If you have any further questions please call me at 714-593-3985.

Sincerely,

Robert P. Wallsmith

Robert P. Wachsmuth Environmental Engineer Denver Region

cc: J. Bard W. Johnson 7-008-01 File 1010

