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GOVERNOR

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August 23, 1993

Robert Wachsmuth  
Environmental Engineer  
Safety-Kleen  
777 Big Timber Road  
Elgin, Illinois 60123

**RE: Permit Modification Request  
Safety-Kleen, Farmington (NMD980698849)**

Dear Mr. Wachsmuth:

On July 1, 1993, the Hazardous and Radioactive Materials Bureau (HRMB) received the Safety-Kleen (SK) proposed permit modification for its Farmington facility. We reviewed the submittal and offer the following comments and recommendations.

The information contained in the modification request appears to be revisions to the Part B Permit Application for the SK Farmington facility. This information is relevant for the processing of the permit modification. However, the HRMB needs more specific information regarding the actual changes in permit condition language that you are requesting. This requirement is found in the Hazardous Waste Management Regulations (HWMR-7), Part IX, Section 270.42(a). Thus, the permit modification request must specify the language changes proposed for the permit conditions including proposed changes in the permit attachments. The operating permit issued by the New Mexico Environment Department (NMED) on April 7, 1991, is the document under which the SK Albuquerque operations are governed. All changes requested in this document must be specified in order for the HRMB to process the modifications.

Please submit the information on a 3.5 inch high density/double sided disc for wordperfect 5.1. New language that you are requesting in the permit, including its attachments, and the original permit language to be replaced should be highlighted or otherwise clearly identified.

Also, our review indicates that the proposed classification of the modifications in your June 23, 1993, letter is in question. All items except #4 and #5 appear to qualify as Class 1 modifications under HWMR-7, Part IX, Section 270.42 Appendix I. Items #4 and #5 appear to be Class 2 modifications. Item #4 appears to be a change in ownership of the property. Please see HWMR-7, Part IX, Section 270.40 for requirements for transferring Permits to new owners or operators, if this is indeed the case for the Farmington facility.

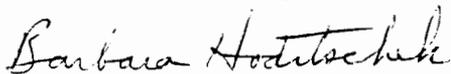
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Item #5 appears to related to authorization of storage of a different waste code than that authorized in the effective permit. Item #5 appears to request a change in the type of containers used for storage. SK must submit more information to clarify how items #4 and #5 may fit into the Class 1 category. Please address these discrepancies in the final permit modification application.

The HRMB will assess fees for the modifications when a complete permit modification application is received that addresses the comments described in this letter. The facility mailing list will be sent to you and the modifications will be promptly processed upon receipt of the fee payment.

Please contact me or Marc Sides of my staff at (505) 827-4308 if you have any questions or would like to discuss the modification process.

Sincerely,



Barbara Hoditschek, RCRA Permit Program Manager  
Hazardous and Radioactive Materials Bureau

cc: Marc Sides, HRMB  
Red - File