



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 8, 1993

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: Safety-Kleen Corp., Farmington Branch #7-008-21
Permit #NMD980698849
Mineral Spirits 150 Flash

Dear Ms. Hoditschek:

Safety-Kleen is requesting a Class I modification to the Farmington permit to include 150 Parts Washer Solvent (Material Safety Data Sheet attached). This modification would require only the addition of the MSDS to the permit, as all references to Parts Washer Solvent in the permit are not product specific.

The wastes produced from the slightly different solvent products would be commingled at the Safety-Kleen Branch and handled as Hazardous Waste from the time it is commingled. The Branch would receive the waste from generators as either nonhazardous or hazardous waste. Safety-Kleen would continue sampling the waste per the Waste Analysis Plan.

It is Safety-Kleen's opinion that the addition of products that would produce the same waste type would be Class I modifications, by HWMR-7, Part IX, Section 901, Appendix I, G.5.d. provided they are managed in the same manner. Appendix I, G.5.d. states that; "Management of different wastes in tanks...That do not require the addition of units or a change in the treatment process or management standards, and provided that the units have previously received wastes of the same type...".

Thank you very much for considering the permit modification discussed above. We look forward to hearing from you regarding this change as a Class I modification. If you could send a mailing list at that time, we will send out mailings immediately.

Please feel free to call me at (303) 322-2947 with any questions or comments.

Sincerely,

Diana Leutner

Diana Leutner
Regional Environmental Manager
Safety-Kleen Corp.

cc: J. Bard/Safety-Kleen
S. Gariss/Safety-Kleen, Farmington