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September 29, 1994

Ms. Darla Jo Huff
Environmental Engineer
Safety-Kleen Corporation
2720 Girard N.E.
Albuquerque, New Mexico 87107

RE: Safety-Kleen Albuquerque Operating Permit
Permit #NMD000804294
Safety-Kleen Farmington Operating Permit
Permit #NMD980698849
Class I and Class II Permit Modifications

Dear Ms. Huff:

NMED has completed processing of the requested permit modifications and determined them to be consistent with the requirements of HWMR-7, Part IX. The requested modifications become effective with the signing of this notice.

On September 21, 1994 a Public Meeting was held in Albuquerque, New Mexico, at 6:00 pm, to allow the citizens of New Mexico to ask questions about the proposed Class I and Class II permit modifications to the Safety-Kleen Operating Permits for the Albuquerque and Farmington Facilities. No citizens attended the Public Meeting.

One citizen did make an inquiry about what possible effects the Class I and Class II modifications might have on the groundwater. The New Mexico Environment Department (NMED) understands that your office addressed this concern and the citizen was satisfied that the modifications were all administrative and no physical changes to the facility or handling procedure changes were made. Therefore ground water will not be impacted by these modifications.

Ms. Darla Jo Huff
Safety-Kleen Permit Modifications
Albuquerque and Farmington Facilities
September 29, 1994
Page 2

If you have any questions about the modifications or the permit contact Robert S. (Stu) Dinwiddie of my staff at 827-4308.

Sincerely,



Kathleen M. Sisneros
Director, Water and Waste Management Division

cc: Benito Garcia, Bureau Chief
Barbara Hoditschek, Program Manager
Red File

LIST OF CLASS II MODIFICATIONS MADE
to the Safety-Kleen Farmington
Operating Permit

Effective: June 1994

Following is a list of the Class II Modifications made to the Safety-Kleen Farmington Operating Permit during the Month of June 1994 by the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED). In the Permit the Modifications are indicated by ~~striking out and shading the items to be deleted~~ and using shading for the material that has been added. Followed by the date month and year (June 1994) that the modification was made. This will assist the reader with the rapid identification of the current modifications and when they were made.

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
ATTACHMENT A			
A-9	A.3	Paragraph 1 Line 5	Deletion of "shipment of each
		Line 6	addition of "annually." and "Copies" deletion of "and copies"
		Line 7	addition of "for the annual analyses"
A-10	A.3.1	Paragraph 1 Line 10	Deletion of the requirement to test the Waste Mineral Spirits pH.
		Paragraph 3 Lines 3-5	The deletion of the requirement to include testing for Pesticides and Herbicides in the TCLP analysis of Waste Mineral Spirits.
A-10	A.3.2	Paragraph 1 Lines 1-4	The deletion of the requirement to include testing for Pesticides and Herbicides in the TCLP analysis of Waste Mineral Spirits Tank Bottom Sludge and Free Water.
A-11	A.3.3	Paragraph 1 Line 8	Deletion of the requirement to test the Immersion Cleaner Solvent pH.

A-11	A.3.3	Paragraph 3 Lines 1-3	The deletion of the requirement to include testing for Pesticides and Herbicides in the TCLP analysis of Immersion Cleaner Solvent.
A-11	A.3.4	Paragraph 1 Line 5	Deletion of the requirement to test the Dry Cleaning Solvent and Still Bottoms pH.
A-12	A.3.4	Paragraph 2 Lines 1-3	The deletion of the requirement to include testing for Pesticides and Herbicides in the TCLP analysis of Dry Cleaning Solvent and Still Bottoms.

sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

b. 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.

c. Still Bottoms

The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is too thin or if there is more than one inch of free liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or will be rejected.

In addition to consistency, the still bottom waste is inspected for color. The waste should appear dark brown or black in color. If the waste is a different color, a service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

A.3 WASTE ANALYSES AT THE RECYCLE CENTER

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. The following section summarizes the waste analyses practiced at the recycle center for the hazardous materials returned from the Farmington branch. For each ~~shipment of each (June 1994)~~ waste type stored at the branch, at least the following analyses must be performed annually, and ~~copies~~ ~~Copies (June 1994)~~ of the results ~~for the annual analyses (June 1994)~~ must be maintained at the branch office for the life of the permit:

A.3.1 Mineral Spirits:

-Flash point (must be greater than 90 F.)

If either of these tests give unacceptable results, the Farmington resource recovery (May 1994) branch manager will be notified immediately and the load will receive appropriate special handling. If the results are acceptable, the following tests will be performed:

- Volatile Organic Analysis, using the U.S. EPA Methods 8010, 8015, and 8120, or approved equivalents. See Table 1 Page A-13.

-Physical Appearance

-Specific Gravity

-pH (June 1994)

-Bottom sediment and water

-Distillation performance

If any of these tests yield unacceptable results or indicate solvent contamination outside the normal range, the branch manager will be notified immediately.

In addition to the tests listed above, which will be performed on a representative sample from every load, a full Toxicology Characteristic Leaching Procedure (TCLP) for all 40 constituents, except for the pesticides (Chlorodane, Endrin, Heptachlor, Heptachlor Epoxide, Lindane, Methoxychlor and Toxaphene) and herbicides (2,4-D and 2,4,5-TP) (June 1994) will be performed on a representative sample of mineral spirits solvent from the Farmington branch at least once each calendar year.

A.3.2 Mineral Spirits Tank Bottom Sludge and Free Water

-Flash point (Must be greater than 90 F.)

-Analysis for content of lead, cadmium, and chromium.

As described above for mineral spirits solvent, a full TCLP analysis except for the pesticides (Chlorodane, Endrin, Heptachlor, Heptachlor Epoxide, Lindane, Methoxychlor and Toxaphene) and herbicides (2,4-D and 2,4,5-TP) (June 1994) will be performed on a representative sample at least once each calendar year.

A.3.3 Immersion Cleaner Solvent

If either of these tests yields unacceptable results, the resource recovery (May 1994) branch manager will be notified immediately and the load will receive appropriate special handling. If the results are acceptable, the following tests will be performed:

-Flash point

-Physical appearance

-Specific gravity

-pH (June 1994)

-Percentage of water

-Volatile Organic Analysis (using EPA methods 8010, 8015, 8020, 8120 or approved equivalents) See Table 1 on Page A-13.

If any of these tests yield unacceptable results or indicate solvent contamination outside the normal range, the branch manager will be notified immediately.

As described above, a full TCLP test except for the pesticides (Chlorodane, Endrin, Heptachlor, Heptachlor Epoxide, Lindane, Methoxychlor and Toxaphene) and herbicides (2,4-D and 2,4,5-TP) (June 1994) will be performed on a representative sample of immersion cleaner at least once each calendar year.

A.3.4 Dry Cleaning Solvent/Still Bottoms

-Physical appearance

-Volatile Organic Analysis for Perchloroethylene (using EPA methods 8010, 8015, 8020, 8120 or approved equivalents)

-Specific Gravity

-pH (June 1994)

If any of these tests yield unacceptable results or indicate contamination outside the normal range, the branch manager will be notified immediately.

As described above, a full TCLP analysis **except for the pesticides (Chlorodane, Endrin, Heptachlor, Heptachlor Epoxide, Lindane, Methoxychlor and Toxaphene) and herbicides (2,4-D and 2,4,5-TP) (June 1994)** will be performed on a representative sample of dry cleaning waste at least once each calendar year.

A.4 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is the responsibility of the Environment, Health and Safety Department at Safety-Kleen's Corporate Office in Elgin, Illinois.

A.5 LAND BAN NOTIFICATION/CERTIFICATION FORMS

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

1. 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
3. 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.6 OPERATING LOG Record (May 1994)

Safety-Kleen maintains an operating log record (May 1994) 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;

LIST OF CLASS I MODIFICATIONS MADE
to the Safety-Kleen Farmington
Operating Permit

Effective: May 1994

Following is a list of the Class I Modifications made to the Safety-Kleen Farmington Operating Permit during the month of May 1994 by the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED). In the Permit the Modifications are indicated by ~~striking out and shading the items to be deleted~~ and using shading for the material that has been added. Followed by the date month and year (May 1994) that the modification was made. This will assist the reader with rapid identification of the current modifications and when they were made.

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
iv	Table of Contents		Addition of Attachment A.1 Analytical Data of the Waste Stream
v	Table of Contents		Addition of Attachments: D.1 Employee Job Descriptions D.2 Environmental Engineer Resumes D.3 Training Plan Outline
vii	Table of Contents		Addition of Attachments: G.1 Estimated Closure Costs H Financial Liability Documents I Part A of the Application
Part B	Cover Page		Indicating Date of last revision as May 1994
Part B	Page ii	Facility Description Abstract	Change in Corporate Address Change in Ownership
A-2	A.1.1	Paragraph 1 Lines 2,3 & 4	Addition of a sentence describing container size and waste quantity.
A-3	A.1.1.b	Paragraph 2 Lines 2,3 & 4	Change in typical quantity of waste in containers.

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
A-3	A.1.1.b	Paragraph 2 Line 6,	Addition of the word "New" to the description of Immersion cleaner Formula.
A-3	A.1.2	Paragraph 1 Lines 3, 4, 5 & 6	Addition of typical container description and change "drum" to "container".
A-4	A.2	Paragraph 3 Line 11	Change in title of "branch manager" to "Resource recovery branch manager".
A-5	A.2	Paragraph 4 Number 9	Change in wording to indicate that waste shipments from Farmington are mixed with shipments from other service centers.
A-6		Paragraph 1 Lines 1, 2 & 3	Change in title of "branch manager" to "resource recovery branch manager".
A-7	A.2.1b.1	Paragraph 1 Lines 3 through 7	Addition of information describing spent mineral spirits waste.
A-8	a.	Line 1	Change of "existing" to "Old Formula Immersion Cleaner".
	a.	Lines 3 & 4	Addition of information describing the amount of old formula immersion cleaner in a container.
	b.	Lines 1, 2, 3, 4 & 7	Change in description of new formula immersion cleaner.
	3.a.	Lines 3 & 4	Addition of description of containers for spent filter cartridges.
A-10	A.3.1.	Line 3	Change in title of "branch manager" to "resource recovery branch manager".
A-12	A.6.	Title and Line 2	Change "Operating Log" to "Operating Record".

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
A-13	A.6 (10)	Line 2	Change in the title of "Branch Manager to "Resource Recovery Branch Manager"
Attachment A.1		Analytical Data of Waste Streams	Addition of entire attachment.
B-1		Paragraph 1 Lines 7 & 8	Change in the description of outdoor lighting control.
		Paragraph 3 Line 3	Change in description of pump control location.
C-1		Paragraph 1 Line 1	Change in title of "branch manager" to "resource recovery branch manager".
		Paragraph 2 Lines 1, 2, & 3	Addition of information on the facility inspection record review.
D-1		Personnel Training Abstract	Addition of entire page.
D-2	D.1	Lines 2 & 3	Change in requirements for which employees receive which training.
		Line 5	Addition of Attachment D.1.
		Line 9	Addition of Attachment D.2
		Line 13 & 14	Change in title of "branch manager" to "resource recovery branch manager".
		Line 17	Addition of Attachment D.3.
	D.2	Organization Structure and Job Descriptions	Entire paragraph changed to clarify training requirements and descriptions.
	D.2.1	Title Line 2 Line 4	Change in title of "branch manager" to "resource recovery branch manager".

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
D-3	D.2.1	Paragraph 1 Lines 1 & 3 Paragraph 2 Line 1	Change in title of "branch manager" to "resource recovery branch manager".
D-4	D.2.2.e.	Line 1	Change in title of "branch manager" to "resource recovery branch manager".
		Line 3	Addition of Attachment D.2.
	D.3	Description of the Training Program	Change in entire section
	D.3.1.	Title	Change in title of "branch manager" to "resource recovery branch manager".
		Line 6	Addition of waste analysis profiles.
		Line 9	Addition of Attachment D.3.
		Paragraph 2 Line 1	Addition of word "about"
D-5	D.3.1.	Line 1	Change in description of training.
		Line 3	Addition of Part A
		Line 5	Addition of Attachment D.3
	D.3.2.		Addition of Attachment D.3
	D.3.3.	Training of Sales Manager	Addition of entire section
	D.3.4.	Line 1	Change in section number only.
D-6		Paragraph 1 Line 7	Addition of Attachment D.3
	D.3.5.	Line 1	Change in section number
		Line 8	Addition of Attachment D.3

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
D-6	D.3.6.	Line 1	Change in section number
		Paragraph 1 Lines 3 & 4	Change "it" to "The annual"
	D.3.6.	Paragraph 2 Line 3	Addition of "slide/tape and/or"
	D.4	Lines 2 & 3	Addition of Attachment D.3
D-1-1		Employee Job Descriptions	Addition of Attachment D-1
D-2-1		Environmental Engineer Resume	Addition of Attachment D-2
D-3-1		Training Plan Outline	Addition of Attachment D-3
E-1		Preparedness and Prevention Plan Abstract.	Addition of entire page.
E-2	E.1	Paragraph 2 Line 1	Change "five" to "several" and deletion of "three of"
	E.1	Line 8	Addition of "three"
	E.1.a.	Paragraph 1 Lines 3, 4 & 5	Change in description of drums or containers
		Paragraph 3	Addition of entire paragraph
		Paragraph 4 Lines 5 & 6	Addition of container description
E-3		Paragraph 2 Lines 3 & 4	Addition of container description information
E-5	E.3.2.	Paragraph 1 Line 7	Addition of "or equivalent"
		Paragraph 2 Lines 3 & 4	Addition of container description information
		Paragraph 3	Addition of entire paragraph
		Paragraph 4	Addition of entire paragraph

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
E-5	E.4.	Line 2	Change "log" to "record"
E-6	E.4.1.	Paragraph 1 Lines 2 & 3	Addition of container description
	E.4.1.	Lines 5 through 9	Addition of information covering the bottom sediment in the dumpster/drum washer.
		Paragraph 3 Lines 2 & 3	Addition of sentence regarding non-mixing of waste.
		Paragraph 5	Addition of entire paragraph
		Paragraph 6 Line 1	Enhanced explanation of container storage configuration.
	E.4.2.	Paragraph 1 Line 3	Change in title "branch manager" to "resource recovery branch manager"
E-7	E.4.2. (b)	Paragraph 3 Line 2	Change in title "branch manager" to "resource recovery branch manager"
		Paragraph 4 Line 1	Change in title "branch manager" to "resource recovery branch manager"
E-8	E.4.2.	Paragraph 1 Line 1	Change in title "branch manager" to "resource recovery branch manager"
		Paragraph 2 Line 1	Change in title "branch manager" to "resource recovery branch manager"
		Paragraph 3 Line 1	Change in title "branch manager" to "resource recovery branch manager"
E-9	E.4.2.	Paragraph 2 Lines 1 & 4	Change in title "branch manager" to "resource recovery branch manager"

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
E-10	E.5	Lines 5 & 6	Delete sentence referring to hoist.
	E.5.1.a.	Lines 1 & 2	Enhanced description of containers
E-12	E.6	Paragraph 1 Lines 2 & 3	Enhanced description of mineral spirits tanks and contents.
E-13	E.8	Line 6	Change in title "branch manager" to "resource recovery branch manager"
		Lines 10 & 11	Sentence added about 24 hour reporting procedures.
	E.9	Paragraph 1 Line 6	Sentence added about outdoor lighting control and operation.
		Paragraph 3 Line 2	Description of the pump control location is changed to indicate proper location.
F-1		Contingency Plan Abstract	Addition of entire page
F-2	F.2.	Paragraph 1 Line 5	Title change "branch manager" to "resource recovery branch manager"
		Lines 6 & 7	Change in the designation of the alternate Emergency Coordinator.
F-3	F.2.3.b.	Lines 2, 3 & 6	Change in title from "Health and Environment Department" to New Mexico Environment Department"
F-4	F.2.3.	Paragraph 2 Lines 3 & 4	Change in title from "Health and Environment Department to New Mexico Environment Department"
	F.2.4.c.	Line 2	Change in title from "Health and Environment Department" to New Mexico Environment Department"

PAGE	SECTION	PARAGRAPH/LINE	DESCRIPTION OF MODIFICATION
F-6	F.3.1.	Line 2	Change in title from "Health and Environment Department" to New Mexico Environment Department"
	F.3.2.	Paragraph 5 Line 3 & 4	Field Spill Report form title change and use requirement description
F-7	F.3.2.	Lines 1 & 2	Field Spill Report form title change and use requirement description
	F.3.3.	Paragraph 3 Line 1	Description of "Old Formula Immersion Cleaner"
		Lines 4 & 5	Sentence added
G-1		Closure Plan Abstract	Addition of entire page
Attachment G.1		Estimated Closure Cost	Addition of entire Attachment G.1
Attachment H		Financial Liability Documents	Addition of entire Attachment H
Attachment I		Part A of the Permit Application	Addition of entire Attachment I

CONTENTS PART B

<u>Section</u>	<u>Page</u>
Certification Statement	i
FACILITY DESCRIPTION	
Abstract	vii
Description of Business Activity	vii
ATTACHMENT A. WASTE ANALYSIS PLAN	
Abstract	A - 1
A.1 Description of Wastes	A - 2
A.1.1 Wastes Resulting from the Parts Washer Service	A - 2
A.1.2 Wastes Resulting from the Dry Cleaner Service	A - 3
A.2 Quality Control Procedures	A - 6
A.2.1 Qualitative Waste Analysis	A - 6
a. general inspection procedures	A - 6
b. waste specific criteria	A - 7
1 spent mineral spirits solvent	A - 7
2 immersion cleaner	A - 7
3 dry cleaner waste	A - 9
A.3 Waste Analysis at the Recycle Center	A - 12
A.4 Waste Analysis Plan Update	A - 12
A.5 Land Ban Notification/Certification Forms	A - 12
A.6 Operating Record	A - 12
ATTACHMENT A.1 Analytical Data of Waste Streams (Attachment Added May 1994)	A.1 - 1
ATTACHMENT B. SECURITY MEASURES	B - 1
ATTACHMENT C. INSPECTION PROCEDURES	C - 1

ATTACHMENT D. PERSONNEL TRAINING

Abstract	D - 1
D.1 Outline of Training Program	D - 2
D.2 Organization Structure and Job Descriptions	D - 2
D.2.1 Branch Manager	D - 3
D.2.2 Environment, Health and Safety Department	D - 3
D.3 Description of the Training Program	D - 4
D.3.1 Training of New Branch Managers	D - 4
D.3.2 Training of new Sales Managers	D - 5
D.3.3 Training of New Branch Secretaries	D - 5
D.3.4 Training of New Sales Representatives	D - 6
D.3.5 Training of New Warehousemen	D - 6
D.3.6 Annual Training	D - 6
D.4 Training Records	D - 6

ATTACHMENT D.1 EMPLOYEE JOB DESCRIPTIONS D 1 - 1 (Attachment Added May 1994)

ATTACHMENT D.2 ENVIRONMENTAL ENGINEER RESUMES D 2 - 1 (Attachment Added May 1994)

ATTACHMENT D.3 TRAINING PLAN OUTLINE D 3 - 1 (Attachment Added May 1994)

ATTACHMENT E. FACILITY DESCRIPTION, WASTE HANDLING, PREPAREDNESS AND PREVENTION PROCEDURES

Abstract	E - 1
E.1 Description of Business Activity	E - 2
E.1.a Parts Cleaner Service	E - 2
E.1.b Dry Cleaner Service	E - 3
E.2 Description of the Facility	E - 3
E.2.1 Regional Description	E - 3
E.3 Facility Design	E - 4
E.3.1 Tank Storage	E - 4
E.3.2 Drum Storage	E - 5
E.4 Waste Handling	E - 5
E.4.1 Waste Management Practices	E - 5
E.4.2 Manifest System	E - 6
E.4.3 Operating Record	E - 9
E.4.4 Biennial Reports	E - 9

ATTACHMENT G. CLOSURE PLAN

Abstract	G - 1
G.1 Purpose	G - 2
G.2 Aboveground Tank and Associated Piping	G - 2
G.2.1 Removal of the Waste Material and Operating of the Tank	G - 2
G.2.2 Removal of Residual Waste and Cleaning of the Tank	G - 3
G.2.3 Removal of the Tank	G - 5
G.3 Drum Storage Area in Warehouse	G - 5
G.4 Solvent Return and Fill Station	G - 6
G.5 Facility Closure Schedule and Certification	G - 6

ATTACHMENT G.1 ESTIMATED CLOSURE COSTS **G.1 - 1**
(Attachment Added May 1994)

ATTACHMENT H FINANCIAL LIABILITY DOCUMENTS **H.1**
(Attachment Added May 1994)

ATTACHMENT I PART A of the APPLICATION **I.1**
(Attachment Added May 1994)