

**Safty-Kleen
Farmington Facility
Modified Permit**

Effective 11-06-96

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HSWA Permit

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MODULE I - GENERAL PERMIT CONDITIONS

I.A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this Permit. Any storage of hazardous waste requiring a permit under the New Mexico Hazardous Waste Management Regulations (HWMR-6), part V and not specifically authorized in this Permit is prohibited. Subject to HWMR-6, Part IX, 40 CFR 270.4, compliance with this Permit during its term constitutes compliance, for purposes of enforcement, with the New Mexico Hazardous Waste Act (Sections 74-4-1 et seq. NMSA 1978) and HWMR-6, Pts. V, VII and IX, only for those management practices specifically authorized by this Permit. The Permittee is also required to comply with HWMR-6, Pts. I, II, III and IV to the extent the requirements of those Parts are applicable. The Permittee must also comply with all applicable self-implementing provisions imposed by the Resource Conservation and Recovery Act (RCRA) or HWMR-6, Pt. VIII. A Complete RCRA Permit consists of this permit and a US EPA Permit issued under provisions of the Hazardous and Solid Waste Amendments of 1984 (HSWA) which addresses the portion of the RCRA program for which the state is not authorized. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 106(a), 104 or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment. (HWMR-6, Pt. IX, § 270.4, 270.30(g))

I.B. PERMIT ACTIONS

I.B.1. Permit Modification, Revocation and Reissuance, and Termination

This Permit may be modified, revoked and reissued, or terminated for cause, as specified in HWMR-6, Pt. IX, § 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition. (HWMR-6, Pt. IX, § 270.4(a) and 270.30(f))

I.B.2. Permit Renewal

This Permit may be renewed as specified in HWMR-6, Pt. IX, § 270.30(b) and Permit Condition I.E.2. Review of any application for a Permit renewal shall consider improvements in the state of control and measurement technology, as well as changes in applicable regulations. (HWMR-6, Pt. IX, § 270.30(b))

I.C. SEVERABILITY

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. (HWMR-6, Pt.X Section 1003)

I.D. DEFINITIONS

For purposes of this Permit, terms used herein shall have the same meaning as those in HWMR-6, Pts. I, V, VII, VIII, IX unless this Permit specifically provides otherwise; where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. "Secretary" means the Secretary of the New Mexico Environment Department (NMED), or his designee or authorized representative. "Regional Administrator" means the Regional Administrator of EPA Region VI or his designee or authorized representative.

I.E. DUTIES AND REQUIREMENTS

I.E.1. Duty to Comply

The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an Emergency Permit. Any Permit noncompliance, other than noncompliance authorized by an emergency Permit, constitutes a violation of RCRA and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. (HWMR-6, Pt. IX, § 270.30(a))

I.E.2. Duty to Reapply

If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee shall submit a complete application for a new Permit at least 180 days prior to Permit expiration. (HWMR-6, Pt. IX, § 270.10(h), 270.30(b))

I.E.3. Permit Expiration

Pursuant to HWMR-6, Pt. IX, § 270.50, this Permit shall be effective for a fixed term not to exceed ten years. As long as NMED is the Permit-issuing authority, this Permit and all conditions herein will remain in effect beyond the Permit's expiration date, if the Permittee has submitted a timely, complete application (see HWMR-6, Pt. IX, § 270.10, 270.13 through 270.29) and, through no fault of the Permittee, the Secretary has not issued a new Permit, as set forth in § 270.51.

I.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee, in an enforcement action that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit. (HWMR-6, Pt. IX, § 270.30(c))

I.E.5. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable, to prevent significant adverse impacts on human health or the environment. (HWMR-6, Pt. IX, § 270.30(d))

I.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit. (HWMR-6, Pt. IX, § 270.30(e))

I.E.7. Duty to Provide Information

The Permittee shall furnish to the Secretary, within a reasonable time, any relevant information which the Secretary may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Secretary, upon request, copies of records required to be kept by this Permit. (HWMR-6, Pt. V, § 264.74(a), Pt. IX, § 270.30(h))

I.E.8. Inspection and Entry

Pursuant to HWMR-6, Pt. IX, § 270.30(i), the Permittee shall allow the Secretary, or an authorized representative, upon the presentation of credentials and other documents, as may be required by law, to:

I.E.8.a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;

- I.E.8.b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- I.E.8.c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- I.E.8.d. Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by Hazardous Waste Act, any substances or parameters at any location.

I.E.9. Monitoring and Records

- I.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample must be described in Permit Attachment A (the Waste Analysis Plan) or be approved by the Secretary. Analytical methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, Standard Methods of Wastewater Analysis, or an equivalent method, as specified in Permit Attachment A or approved by the Secretary. (HWMMR-6, Pt. IX, § 270.30(j)(1))
- I.E.9.b. The Permittee shall retain records of all monitoring sampling, and analytical information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, the certification (concerning waste minimization) required by HWMMR-6, Pt. V, § 264.73(b)(9), and records of all data used to complete the application for this Permit for a period of at least 3 years from the date of the sample, measurement, report, record, certification, or application. These periods may be extended by request of the Secretary at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility. (HWMMR-6, Pt. V, § 264.74(b) and 270.30(j)(2))
- I.E.9.c. Pursuant to HWMMR-6, Pt. IX, § 270.30(j)(3), records of monitoring sampling, and analytical information shall specify:
 - i. The dates, exact place, and times of sampling or measurements;
 - ii. The individuals who performed the sampling or measurements;
 - iii. The dates analyses were performed;

- iv. The individuals who performed the analyses;
- v. The analytical techniques or methods used; and
- vi. The results of such analyses.

I.E.10. Reporting Planned Changes

The Permittee shall give notice to the Secretary, as soon as possible, of any planned physical alterations or additions to the Permitted facility. (HWMR-6, Pt. IX, § 270.30(I)(1))

I.E.11. Reporting Anticipated Noncompliance

The Permittee shall give advance notice to the Secretary of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. (HWMR-6, Pt. IX, § 270.30(I)(2))

I.E.12. Transfer of Permits

This Permit is not transferable to any person, except after notice to the Secretary. The Secretary may require modification or revocation and reissuance of the Permit pursuant to HWMR-6, Pt. V, § 264.12(c) and Pt. IX, § 270.40. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of HWMR-6, Pt. V and IX, and this Permit. HWMR-6, Pt. IX, § 270.30(I)(3), Pt. V, § 264.12(c)

I.E.13. Twenty-Four Hour Reporting

I.E.13.a. The Permittee shall report to the Secretary any spill, release, fire, explosion, or other occurrence which involves a quantity of hazardous waste greater than one pound which escapes the secondary containment, or which might endanger human health or the environment. This report must be made orally within twenty-four hours from the time the Permittee first becomes aware of the situation. It must be made even if the contingency plan is not implemented. The report shall include:

- i. Name, address, and telephone number of the owner or operator;
- ii. Name, address, and telephone number of the facility;
- iii. Date, time, and type of incident;

- iv. Name and quantity of materials involved;
- v. The extent of injuries, if any;
- vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
- vii. Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.13.b. A written submission shall also be provided within five days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Regional Administrator may waive the five-day written notice requirement in favor of a written report within 15 days. (HWMR-6, Pt. IX, § 270.30(I)(-6))

I.E.14. Other Noncompliance

The Permittee shall report all other instances of noncompliance, not otherwise required to be reported above, Permit Conditions I.E.1. and I.E.13., as soon as the Permittee becomes aware of them. The reports shall contain the information listed in Permit Condition I.E.13.b (HWMR-6, Pt. IX, § 270.30(I)(10))

I.E.15. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the Permit application, or submitted incorrect information in a Permit application or in any report to the Secretary, the Permittee shall promptly submit such facts or information. (HWMR-6, Pt. IX, § 270.30(I)(11))

I.E.16. Administrative Changes to Facility Not Requiring a Permit Modification

Semi-annually (June 30 and December 31) unless otherwise necessary, the permittee is required to submit to the Secretary of New Mexico Environment Department, hereafter referred to as Secretary, a notice and any required updates to permit information listed in section I.E.16.a of the permit. Changes to these items do not require a modification of the permit as indicated in section I.B.1 above. The notice shall indicate any changes initiated by Safety-Kleen in the previous 6 month period and shall be accompanied by two copies

I.H. CONFIDENTIAL INFORMATION

In accordance with HWMR-6, Pt. IX, § 270.12, the Permittee may claim confidential any information required to be submitted by this Permit.

I.I. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by HWMR-6, Pt. V, § 264.13 and this Permit.
2. Inspection schedules, as required by HWMR-6, Pt. V, § 264.15(b)(2) and this Permit.
3. Personnel training documents and records, as required by HWMR-6, Pt. V, § 264.16(d) and this Permit.
4. Contingency Plan, as required by HWMR-6, Pt. V, § 264.53(a) and this Permit.
5. Operating record, as required by HWMR-6, Pt. V, § 264.73 and this Permit.
6. Closure Plan, as required by HWMR-6, Pt. V, § 264.112(a) and this Permit.
7. Annually-adjusted cost estimate for facility closure, as required by HWMR-6, Pt. V, § 264.142(d) and this Permit.
8. All other documents required by Module I, Permit Condition E.9, Module II, Permit Condition II.H.6 and Module III, Permit Condition III.B.3.a.ii.

I.J. PERMIT CONSTRUCTION

I.J.1. CITATIONS

Whenever paragraphs of this Permit or of the Hazardous Waste Management Regulations are cited, such citations include all subordinate sections of the cited paragraph. When subordinate sections are cited, such citations include all subsections of the cited subparagraphs. All such citations shall be considered an inclusion by reference to this Permit in accordance with HWMR-6, Pt. IX.

I.J.2. GENDER

Whenever the pronoun "he" is used in reference to the Secretary of the New Mexico Environment Department or the Permittee, it is to be read as "she" in any instance where the object of the reference is female.

MODULE II - GENERAL FACILITY CONDITIONS

II.A. DESIGN AND OPERATION OF FACILITY

The Permittee shall construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or nonsudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, as required by HWMR-6, Pt. V, § 264.31. The Permittee shall maintain the structures and equipment and follow the procedures described in Permit Attachments A through G.

II.B. REQUIRED NOTICES

II.B.1. Hazardous Waste Imports

This permit does not allow the Permittee to accept wastes from a foreign source. If the Permittee is to receive hazardous waste from a foreign source, he shall apply and receive a permit modification in accordance with HWMR-6, Part IX, 40 CFR §270.41 or §270.42 prior to accepting such waste.

II.B.2. Hazardous Waste from Off-Site Sources

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate Permits, and will accept the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (HWMR-6, Part V, 40 CFR §264.12(b))

II.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the waste analysis procedures required by HWMR-6, Pt. V, 40 CFR §264.13, as described in the attached Waste Analysis Plan, Permit Attachment A.

The Permittee shall verify the analysis of each waste stream according to the schedule set out in Permit Attachment A. Any sampling, testing, or analytical methods not specifically described in Permit Attachment A must be as specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, or equivalent methods approved by the Secretary. At a minimum, the Permittee shall maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. If the Permittee uses a contract laboratory to perform analyses, then the Permittee shall inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this Permit.

II.D. SECURITY

The Permittee shall comply with the security provisions of HWMR-6, Pt. V, §264.14(b)(2) and (c) and Permit Attachment B (Security Measures).

II.E. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection schedule set out in Permit Attachment C (Inspection Procedures). The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by HWMR-6, Pt. V, § 264.15(c). Records of inspection shall be kept, as required by HWMR-6, Pt. V, § 264.15(d) and by Module I, Permit Condition I.1.2.

II.F. PERSONNEL TRAINING

The Permittee shall conduct personnel training, as required by HWMR-6, Pt. V, § 264.16. This training program shall follow the attached outline, Permit Attachment D (Personnel Training). The Permittee shall maintain training documents and records, as required by HWMR-6, Pt. V, § 264.16(d) and (e).

II.G. SPECIAL PROVISIONS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of HWMR-6, Pt. V, § 264.17(a). The Permittee shall follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Permit Attachment E (Waste Handling Practices).

II.H. PREPAREDNESS AND PREVENTION

II.H.1. Required Equipment

At a minimum, the Permittee shall maintain at the facility the equipment set forth in the Permit Attachment E (Waste Handling Practices) and Permit Attachment F (Contingency Plan), as required by HWMR-6, Pt. V, § 264.32.

II.H.2. Testing and Maintenance of Equipment

The Permittee shall test and maintain the equipment specified above in Permit Condition II.1.1, as necessary, to assure its proper operation in time of emergency, as required by HWMR-6, Pt. V, § 264.33.

II.H.3. Access to Communications or Alarm System

The Permittee shall maintain access to the communications or alarm system, as required by HWMR-6, Pt. V, § 264.34.

II.H.4. Required Aisle Space

At a minimum, the Permittee shall maintain aisle space, as required by HWMR-6, Pt. V, § 264.35 and the attached plans and specifications, Permit Attachment E.

II.H.5. Arrangements with Local Authorities

The Permittee shall maintain Preparedness and Prevention arrangements with state and local authorities, as required by HWMR-6, Pt. V, § 264.37. If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

II.H.6. The Permittee will maintain in an accessible location a current inventory showing type, location and quantity of hazardous materials and hazardous waste at the facility.

II.I. CONTINGENCY PLAN

II.I.1. Implementation of Plan

The Permittee shall immediately carry out the provisions of the Contingency Plan, Permit Attachment F, whenever there is a fire, explosion, or release of hazardous waste or constituents which could threaten human health or the environment.

II.I.2. Copies of Plan

The Permittee shall maintain and distribute copies of the Contingency Plan in accordance with the requirements of HWMR-6, PT.V, § 264.53.

II.I.3. Amendments to Plan

The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by HWMR-6, Pt. VI, § 264.54.

II.I.4. Emergency Coordinator

A trained emergency coordinator shall be available at all times in case of an emergency, as required by HWMR-6, Pt. V, § 264.55.

II.J. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of HWMR-6, Pt. V, §§ 264.71, 264.72, and 264.76.

II.K. RECORDKEEPING AND REPORTING

In addition to the recordkeeping and reporting requirements specified elsewhere in this Permit, the Permittee shall do the following:

II.K.1. Operating Record

The Permittee shall maintain a written operating record at the facility, as required by HWMR-6, Pt. V, § 264.73.

II.K.2. Biennial Report

The Permittee shall comply with the biennial reporting requirements of HWMR-6, Pt. V, § 264.75.

II.L. GENERAL CLOSURE REQUIREMENTS

II.L.1. Performance Standard

The Permittee shall close the facility, as required by HWMR-6, Pt. V, § 264.111 and in accordance with Permit Attachment G (the Closure Plan).

II.L.2. Amendment to Closure Plan

The Permittee shall amend the Closure Plan, in accordance with HWMR-6, Pt. V, § 264.112(c), whenever necessary.

II.L.3. Notification of Closure

The Permittee shall notify the Secretary in writing at least 45 days prior to the date on which he expects to begin closure of any of the facility as required by HWMR-6, Pt. V, § 264.112(d).

II.L.4. Time Allowed For Closure

After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the unit or facility all hazardous waste and shall complete closure activities, in accordance with HWMR-6, Pt. V, § 264.113 and the schedules specified in Permit Attachment G (the Closure Plan).

II.L.5. Disposal or Decontamination of Equipment, Structures, and Soils

The Permittee shall decontaminate or dispose of all contaminated equipment, structures, and soils, as required by HWMR-6, Pt. VI, § 264.114 and Permit Attachment G (the Closure Plan).

II.L.6. Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the Closure Plan, as required by HWMR-6, Pt. VI, § 264.115.

II.M. COST ESTIMATE FOR FACILITY CLOSURE

II.M.1. The Permittee shall keep at the facility a copy of the most recent closure cost estimate, based on the closure plan contained in Permit Attachment G and prepared in accordance with HWMR-6, Pt. V, § 264.142

II.M.2. The Permittee must adjust the closure cost estimate for inflation in accordance with the requirements of HWMR-6, Pt. V, § 264.142(b).

~~II.M.3. The Permittee must revise the closure cost estimate on March 1 annually as required by HWMR-6, Pt. V, § 264.142(c).~~
II.M.3. The Permittee must revise the closure cost estimate whenever there is a change in the facility's Closure Plan as required by HWMR-6, Pt. V, § 264.142(c).

II.N. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

The Permittee shall demonstrate continuous compliance with the requirements of HWMR-6, Pt. V, § 264.143. ~~on March 31, annually during the life of this Permit.~~ ~~Annually during the life of this Permit,~~ the permittee must demonstrate continued compliance by submitting to the Secretary a copy of the documentation required by Pt. V, § 264.143 for the financial assurance mechanism(s) selected. This submission must be made at the time specified in Pt. V, § 264.143; or, if none is specified, it must be made within 30 days after the anniversary of the issuance of this Permit. Any change in the financial assurance mechanisms used to satisfy Permit Condition II.M. above, must be approved in advance by the Secretary as required by HWMR-6, Pt. V, § 264.143.

II.O. LIABILITY REQUIREMENTS

The Permittee shall demonstrate continuous compliance with the requirement of HWMR-6, Pt. V, § 264.147(a) to maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs. This demonstration must be made by submitting a signed duplicate original of the insurance policy endorsement or Certificate of Insurance annually to the Secretary. This submission must be made on or before the expiration or anniversary date of the insurance policy. The wording of the endorsement or Certificate of Insurance must be identical to the wording required in HWMR-6, Pt. V, § 264.151(i) or (j).

II.P INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

The Permittee shall comply with the provisions of HWMR-6, Pt. V, § 264.148, whenever any of the events listed in that Section should occur.

II.Q REQUIREMENTS FOR RELEASES

II.Q.1. Releases from the Container Storage Area or Tank Storage Area

If, based on information contained in reports required by Module I, Permit Conditions I.E.13.a., b. and d., the Secretary determines that a release from the container and or tank storage area is of such quantity, duration or repeated occurrence that further assessment is required, he may direct the Permittee to conduct the sampling and analysis required pursuant to HWMR-6, Pt. IX, § 270.14(d).

II.Q.2. Releases from Newly Identified Solid Waste Management Units (SWMUs)

For newly identified SWMUs, the Permittee shall fulfill the requirements of Module V, Permit Condition V.E.

MODULE III - CONTAINERS

III.A. MODULE HIGHLIGHTS

- III.A.1 This permit authorizes storage of hazardous wastes in containers in the part of the warehouse equipped with secondary containment. The secondary containment is described briefly below, and more completely in Permit Attachment E (Waste Handling Practices).
- III.A.2 The warehouse consists of ~~the southern half of a~~ metal storage building, enclosing approximately ~~4,530,060~~ square feet. This area is further divided into an office, rest room, and a secure area for the storage of various Safety-Kleen products, as well as an area with secondary containment for drum storage.
- Spent immersion cleaner, ~~spent solvent~~, spent dry cleaning solvents, and other dry cleaning wastes will be stored only in the area protected by a secondary containment system as described below and Permit Attachment E. Unused Safety-Kleen chemical products may be stored in the area equipped with secondary containment. Wastes will be stored in ~~4, 15, 16, 20, and 30-gallon drums~~ containers meeting DOT specifications. The maximum volume of liquid (whether hazardous waste or any other liquid) that may be stored at any one time in the area equipped with secondary containment is ~~4,464,382~~ gallons. Secondary containment is provided by a flat sealed concrete floor surrounded by a six-inch wide by four-inch high steel reinforced concrete curb, with a 448 gallon sealed concrete sump at the west end of the containment equipped area.
- III.A.3 The Permittee may store products awaiting distribution as well as hazardous waste in the storage units. However, product storage is subject to several restrictions to prevent compromising the safe storage of waste. These restrictions are set forth in Permit Conditions III.L, and include requirements that products not be stored in the same secondary containment area as any hazardous waste with which they might be incompatible, and that all liquids be counted in determining the maximum allowable liquid storage volume.
- III.A.4 The Permittee will store waste containers equivalent to the containers specified for each waste by the U.S. Department of Transportation (DOT) regulations, set forth in Title 49 of the Code of Federal Regulations, Part 173 (49 CFR §173). These containers will meet or exceed the requirements for strength and integrity specified by DOT at 49 CFR §178 for each class of containers.

III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

III.B.1. The Permittee may store the following wastes in containers at the facility, subject to the terms of this Permit:

Description of Hazardous Waste	EPA Hazardous Waste Number	Maximum Volume	Maximum Number and Type of Containers
Spent immersion drums, Cleaner, and dry cleaner waste, and spent solvent	F002, F004, D001, 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, 3038, 3039, D040, D041, D042, D043.	4,4643 3,820	279 16 gal. or the equivalent volume in 5, 15 or 30 gallon containers stored described in Permit Attachment E. Containers meeting DOT specifications.

III.B.2. The Permittee shall not store any hazardous waste in containers that is not identified in Permit Condition III.B.1 above. If the amount of any waste code handled in a calendar year exceeds the amount listed for that waste code in Permit Attachment H (Part A of the Permit Application), the situation must be reported to NMED and, if the increase in annual quantity is expected to be repeated, the Permittee shall submit a revised Part A by March 1 of the following year. The revised Part A will replace Attachment H and become part of this permit.

III.B.3. The Permittee shall comply with the following conditions (Permit Conditions III.B.3.a. through c. below) regarding storage in containers of wastes identified in HWMR-6, Part VIII, 40 CFR sections 268.10, 268.11, and 268.12 as being subject to the restrictions on land disposal set forth in HWMR-6, Part VIII, 40 CFR Subpart C. The same conditions shall be imposed on the storage of any wastes that may become prohibited or restricted from land disposal by the New Mexico Hazardous Waste Management Regulations during the life of this permit.

- III.B.3.a.
- i. Waste shall be stored for no longer than one year from the date of the first receipt by the Permittee, unless
 - ii. The Permittee furnishes proof to the Secretary that such storage for a period in excess of one year is solely for the purposes of accumulation of such quantities as are necessary to facilitate proper recovery, treatment or disposal.
- III.B.3.b. Each container must be clearly marked as to its contents and the date each period of accumulation begins.
- III.B.3.c. Hazardous wastes meeting the treatment standards in HWMR-6, Part VIII, 40 CFR sections 268.41, 268.42, 268.43 are not subject to the storage prohibition in Permit Condition III.B.3.a. above.

III.C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., it exhibits severe rusting, or other visible structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit. (HWMR-6, Pt. V, § 264.171)

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall assure that the ability of the container to contain the waste is not impaired by any incompatibility with its contents, as required by HWMR-6, Pt. V, § 264.172.

III.E. MANAGEMENT OF CONTAINERS

The Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. (HWMR-6, Pt. V, § 264.173)

III.F. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect the container area daily, in accordance with Permit Attachment C (Inspection Procedures) to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors. (HWMR-6, Pt. V, § 264.174)

III.G. CONTAINMENT SYSTEMS

The Permittee shall maintain the containment system in a leakproof and fully operable condition in accordance with the plans and specifications, contained in Permit Attachment E. (HWMR-6, Pt. V, § 264.175)

III.H. RECORDKEEPING

The Permittee shall place the results of all waste analyses and trial tests and any other documentation showing compliance with the requirements of Permit Conditions III.K.1 and III.K.2 and HWMR-6, Pt. V, § 264.17(b) and 264.177 in the facility operating record. (HWMR-6, Pt. V, § 264.73)

III.I. CLOSURE

At closure of the container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in Permit Attachment G (the Closure Plan). (HWMR-6, Pt. V, 40 CFR § 264.178)

III.J. SPECIAL PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

III.J.1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line. (HWMR-6, Pt. V, § 264.176)

III.J.2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste, and follow the procedures specified in Permit Attachment E. (HWMR-6, Pt. V, § 264.17(a) and 264.176)

III.K. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

III.K.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container. (HWMR-6, Pt. V, 40 CFR §264.177(a))

III.K.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material. (HWMR-6, Pt. V, 40 CFR §264.177(b))

III.K.3. The Permittee shall separate containers of incompatible wastes as required by HWMR-6, Pt. V, 40 CFR §264.177(c).

III.L. STORAGE OF CHEMICAL PRODUCTS

The Permittee may store chemical products in permitted storage units, subject to the conditions set forth below:

1. No products will be stored in the area of the warehouse equipped with secondary containment that might be incompatible with any waste stored there.
2. A distinct and easily identifiable location within the storage area is set aside for products, when they are present.
3. Products are clearly identifiable as such, and differentiated from wastes.
4. The volume of all liquids, product, waste, or otherwise, is included in determining the remaining available storage capacity for liquid waste.
5. The Permittee complies with permit Conditions III.C, III.D, and III.E, substituting the word "product" for the word "wastes" when handling chemical products.
6. The current inventory of stored chemical products (type, quantity and location) is included in the facility inventory required by Permit Condition II.H.6.

MODULE IV – TANKS

IV.A. MODULE HIGHLIGHTS

The tank system at the Safety-Kleen Farmington Branch consists of two 12,000 gallon aboveground, vertical cylindrical steel tanks and their ancillary pumps and piping. The tanks are enclosed within secondary containment provided by concrete slab and wall with a capacity of 18,266 gallons. One of the two tanks contains new solvent awaiting distribution; the other contains spent solvent awaiting return to a Safety-Kleen Recycle Center. The tank containing the spent solvent is the only tank regulated by this permit. The spent solvent is a hazardous waste because of the characteristic of ignitability and the possible characteristic of toxicity as measured by the Toxicity Characteristic Leaching Procedure.

Ancillary equipment to the waste solvent tank includes a return and fill station containing an enclosed metal cabinet which serves as a sump into which the contents of a drum of used solvent can be emptied. A maximum volume of 40 gallons is retained in the sump of the metal cabinet. A float switch controls a pump that moves excess solvent to the spent solvent tank. The metal cabinet also contains a jet, which cleans the sediment from the drum. An additional 200-gallon metal tank containing used parts washing solvent still retaining the capacity for less rigorous cleaning applications is connected to the metal cabinet. This tank is the primary source of solvent for drum washing. When this tank is empty, solvent residing in the bottom of the main cabinet is recirculated through the drum washer for any remaining drum cleaning requirements. All spent solvents and sediments are then pumped into the spent solvent tank. The return and fill station has a roof and is equipped with concrete secondary containment with a capacity of 648 gallons. Piping to the tank from the return and fill station is steel, with welded joints. It is protected by secondary containment except for about five feet at the rear of the return and fill station (which must be inspected daily for leaks). The pump, which provides clean solvent for filling drums, is located within the secondary containment for the tanks, and all its associated piping is located within secondary containment. The connections for emptying the spent solvent tank and filling the clean solvent tank (from tanker trucks) are located within the secondary containment.

Based on an engineer's assessment of the system, the two 12,000 gallon tanks were fabricated and installed in 1981.

IV.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

IV.B.1 The permittee may store a maximum total volume of 12,000 gallons of spent solvent and associated bottom sludge {hazardous wastes on the basis of ignitability (D001) and possible TCLP toxicity (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, D043)} in one tank, as described and depicted in Permit Attachment E, subject to the terms of this Permit.

IV.B.2 The Permittee is prohibited from storing or treating hazardous waste that is not identified in Permit Condition IV.B.1.

IV.C. SECONDARY CONTAINMENT

IV.C.1. The Permittee shall design, construct, and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in Permit Attachment E. (HWMR-6, Pt. V, § 264.193(b)-(f))

IV.D. OPERATING REQUIREMENTS

IV.D.1. The Permittee shall not place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. (HWMR-6, Pt. V, § 264.194(a))

IV.D.2. The Permittee shall prevent spills and overflows from the tank or containment systems using the methods described in Permit Attachment E. (HWMR-6, Pt. V, § 264.194(b))

IV.E. RESPONSE TO LEAKS OR SPILLS

In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions: (HWMR-6, Pt. V, § 264.196(a)-(f))

IV.E.1. Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.

IV.E.2. Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify the Director and demonstrate that the longer time period is required.

If the collected material is a RCRA hazardous waste, it must be managed in accordance with all applicable requirements of HWMR-6, Pts. III, IV, and V. The Permittee shall note that if the collected material is discharged through a point source to U.S. waters or to a Publicly Owned Wastewater Treatment Facility, it is subject to requirements of the Clean Water Act. If the collected material is released to the environment, it may be subject to reporting under 40 CFR Part 302.

IV.E.3. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.

IV.E.4. Close the system in accordance with the Closure Plan, Permit Attachment G, unless the following actions are taken:

- IV.E.4.a. For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.
 - IV.E.4.b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.
 - IV.E.4.c. For a release to the environment caused by a leak from the aboveground portion of the tank system that does not have secondary containment, and can be visually inspected, the Permittee shall repair the tank system before returning it to service.
 - IV.E.4.d. If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in HWMR-6, Pt. V, § 264.192 and § 264.193.
- IV.E.5. For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

IV.F. INSPECTION SCHEDULES AND PROCEDURES

- IV.F.1. The Permittee shall inspect the tank systems, in accordance with the Inspection Schedule, Permit Attachment C, and shall complete the items in Permit Conditions IV.F.2. and IV.F.3. as part of those inspections:
- IV.F.2. The Permittee shall inspect the overfill controls, in accordance with the schedule in Permit Attachment C.(HWMR-6, Pt. § 264.195(a))
- IV.F.3. The Permittee shall inspect the following components of the tank system once each operating day: (HWMR-6, Pt. V, § 264.195(b))
 - IV.F.3.a. Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
 - IV.F.3.b. Data gathered from monitoring and leak detection equipment (e.g., level gauges) to ensure that the tank system is being operated according to its design;

IV.F.3.c. Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

IV.F.4. The Permittee shall document compliance with Permit Conditions IV.F.2. through IV.F.4. and place this documentation in the operating record for the facility. (HWMR-6, Pt. V, § 264.195(d))

IV.G. RECORDKEEPING AND REPORTING

IV.G.1. The Permittee shall report to the Secretary, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. (HWMR-6, Pt. V, § 264.196(d)(1)) (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) (HWMR-6, Pt. V, § 264.196(d)(2)) (Releases that are contained within a secondary containment system need not be reported). If the Permittee has reported the release pursuant to 40 CFR Part 302, this report satisfies the requirements of this Permit Condition. (HWMR-6, Pt. V, § 264.196(d)(1))

IV.G.2. Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Secretary: (HWMR-6, Pt. V, § 264.196(d)(3))

- a. Likely route of migration of the release;
- b. Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);
- c. Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Secretary with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;
- d. Proximity of downgradient drinking water, surface water, and populated areas; and
- e. Description of response actions taken or planned.

IV.G.3. The Permittee shall submit to the Secretary all certifications of major repairs to correct leaks within seven days from returning the tank system to use. (HWMR-6, Pt. V, § 264.196(f))

IV.G.4. The Permittee shall keep on file at the facility the written assessment of the tank system's integrity. (HWMR-6, Pt. V, 40 CFR § 264.191(a))

IV.H. CLOSURE AND POST-CLOSURE CARE

IV.H.1. At closure of the tank system(s), the Permittee shall follow the procedures in the Closure Plan, Permit Attachment G. (HWMR-6, Pt. V, § 264.197(a))

IV.H.2. If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the Closure Plan, then the Permittee shall obtain a Post-Closure Care, Permit Attachment G.

IV.I. SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

IV.I.1. The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in Permit Attachment E are followed. (HWMR-6, Pt. V, § 264.198(a))

IV.I.2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981). (HWMR-6, Pt. V, § 264.198(b))

**STORAGE FACILITY
PERMIT APPLICATION
SAFETY-KLEEN CORP. SERVICE CENTER
FARMINGTON, NEW MEXICO
NMD 980698849**

Prepared by: SAFETY-KLEEN CORP.

September 14, 1987

Revised: June 11, 1990

Revised: October 25, 1990

Revised: May, 1994

Revised: April 30, 1996

CERTIFICATION STATEMENT

Farmington, New Mexico Service Center

NMD 980698849

The undersigned, being a vice president of Safety-Kleen Corp., the permit applicant, certifies under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

David A. Dattilo
Vice President, Sales and Service
~~Scott E. Fore~~ _____ Date
~~Vice President, Environment, Health and Safety~~

Date

ATTESTATION

The undersigned, attesting witness to the Certification Statement and this document dated _____, of which this affidavit is a part, states that I am personally responsible for the preparation of the document, that I personally gathered the information contained herein, and further that the information, to the best of my knowledge and belief, is true, accurate and complete.

~~Jennifer Jendras~~
~~Peter Olsen~~
~~Environmental Permit Writer~~
~~Environment, Health and Safety Manager~~

Date

FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS: Safety-Kleen Corp.
~~777 Big Timber Road~~ ~~1000 North Randall Road~~
Elgin, IL 60123-7857
~~708847~~/697-8460

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

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

FACILITY ADDRESS: Safety-Kleen Corp.(7-008-21)
4210 A Hawkins Road
Farmington, New Mexico 87401

TELEPHONE NUMBER: ~~5052~~/327-9070

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

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

OWNER: ~~GOMET Corporation~~ ~~151 Kinsey~~
~~4215 Brentwood Circle~~ ~~2001 G Drive~~
Farmington, New Mexico 87401
~~505/325-3743~~ ~~303/884-2602~~

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.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT (GAL.)	MATERIAL TO BE STORED
Tank	12,000	18,266	Spent Mineral Spirits Solvent (D001) and the codes listed in the note below)
Container Storage	3,820 4,464	382 448.8	Spent Immersion Cleaner (F002, F004 and the codes listed in the note below)
Warehouse			Dry Cleaning Waste (F002 and the codes listed in the note below)
			Spent Solvent (and the codes listed in the note below)

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, D039, D040, D041, D042, and D043



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

June 13, 1991

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Scott Fore
Vice President, Environmental
Health and Safety
Safety-Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60120

RE: Transmittal of Hazardous Waste Permit for
Safety-Kleen - Farmington NMD980698849

Dear Mr. Fore:

Enclosed is a copy of your permit to operate a hazardous waste facility, under the Hazardous and Solid Waste Amendments of 1984 (HSWA). Also enclosed is EPA's response to the changes in the draft permit.

The New Mexico Environmental Division (NMED) and the Environmental Protection Agency (EPA) have entered into a joint permitting agreement, whereby permits may be issued in New Mexico in accordance with the New Mexico Hazardous Waste Management Act, as well as RCRA. The agreement will remain effective until the State hazardous waste program receives authorization under RCRA to administer HSWA. In order for an applicant to have a fully effective permit, both NMED and EPA must issue the permit.

This letter transmits a copy of your HSWA permit with the necessary signature for EPA approval for permit issuance. The RCRA part of the full permit will be sent to you by NMED. The permit will become effective on the date indicated. The provisions of this permit may be appealed within 30 days of issuance, pursuant to 40 CFR 124.19.

If you have any questions, please contact Bill Gallagher of my staff at (214) 655-6775.

Sincerely yours,

Allyn M Davis

Allyn M. Davis
Director
Hazardous Waste Management Division

Enclosures

cc: Ms. Judith Espinosa, Secretary
New Mexico Environment Department

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 6

HAZARDOUS WASTE PERMIT
(HAZARDOUS AND SOLID WASTE AMENDMENTS, 1984)

PERMITTEE: Safety-Kleen - Farmington Service Center
OWNER: Comet Corporation, Farmington
OPERATOR: Safety-Kleen Corporation
LOCATION: 4200A Hawkins Road
Farmington, New Mexico 87401
I.D. NUMBER: NMD980698849
EFFECTIVE DATE: July 18, 1991
EXPIRATION DATE: April 4, 2001

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), as amended by the RCRA Statute (42 U.S.C. 6901, et seq.), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), a permit is issued to the Comet Corporation and the Safety-Kleen Corporation, doing business as the Safety-Kleen Farmington Service Center (hereafter called the Permittee) to operate a hazardous waste storage facility at the location stated above.

The Permittee must comply with all the terms and conditions of this permit. This permit consists of the conditions contained herein (including the attachments). Said conditions are needed to ensure that the Permittee's hazardous waste management activities comply with all applicable Federal statutory and regulatory requirements. Applicable requirements are those which are found in, referenced in, or incorporated into that version of RCRA or the regulations promulgated pursuant to RCRA that are in effect on the date this permit is issued (See 40 CFR 270.32 (c)).

This permit is issued in part pursuant to the provisions of Section 201, 202, 203, 206, 207, 212, 215, and 224 of HSWA which modified Sections 3004 and 3005 of RCRA. These require corrective action for all releases of hazardous waste or hazardous constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit, regardless of the time at which the waste was placed in such unit and provides the authority to review and modify the permit at any time. The decision to issue this permit is based on the assumption that all information contained in the permit application is accurate and that the facility will be operated as specified in the permit application.

Any inaccuracies found in the application may be grounds for termination or modification of this permit (see 40 CFR 270.41, 270.42 and 270.43) and potential enforcement action.

Under Federal Law, this permit is effective on the effective date specified above unless a petition to the Administrator of the U.S. Environmental Protection Agency is filed in accordance with the requirements of 40 CFR 124.19.

Issued this 13th day of June, 1991

by Allyn M. Davis
Allyn M. Davis, Director
Hazardous Waste Management Division

NOTICE OF PERMIT DECISION

SAFETY-KLEEN FARMINGTON SERVICE CENTER

HSWA PERMIT (MODULE V)

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the RCRA statute (42 USC 6901 et seq., commonly known as RCRA), and the regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified in Title 40 of the Code of Federal Regulations), as amended by the Hazardous Solid Waste Amendment of 1984 (HSWA), a permit is issued to the Safety-Kleen Farming Service Center, to operate a hazardous waste facility located in Farmington, New Mexico.

This Permit, in conjunction with the Hazardous Waste Permit issued by the State of New Mexico, constitutes the full RCRA permit for this facility. Any person who commented on this permit during the comment period may petition the Administrator to review any condition of this permit, within 30 days of issuance, pursuant to 40 CFR 124.19.

The Federal Law that has required permits for hazardous waste facilities is RCRA. The State of New Mexico has been authorized by EPA to carry out regulatory activities which were required by RCRA prior to November of 1984.

In November of 1984, Congress passed extensive changes to RCRA, known as the Hazardous and Solid Waste Amendments (HSWA), which resulted in additional permit requirements. The State has not yet been authorized to act in lieu of EPA for this portion of the program, and EPA still retains the authority for this portion of the permit.

This permit has been finalized under a joint effort between the State and EPA. The New Mexico Environmental Division (NMED) developed both the RCRA and HSWA portions of the permit; however, EPA will issue and enforce this portion (Module V) of the permit until the State is authorized to run this portion of the program.

This Module of the joint permit requires the following:

1. Submission of waste minimization plan annually to EPA;
2. Dust suppression prohibition for hazardous wastes;
3. Hazardous Waste Land prohibition requirements;
4. Notification requirements for Areas of Concerns; and
5. Emission Standards for process vent and equipments leaks.

In addition there is a notification requirement to EPA if new Solid Waste Management Units (SWMU's) are found at the facility. Also, there is corrective action requirements if the facility finds releases to the environment from SWMUs.

I. BACKGROUND INFORMATION

1. Facility location:

The Safety-Kleen Farmington Service Center is located in Farmington, New Mexico at 4200A Hawkins Road

2. Facility Activities and Waste Handling: Safety-Kleen collects spent cleaning solvents of three different types from its customers and ships these solvents to a recycling facility for reclamation. 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, used primarily 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.

3. Public Notice: The public notice of the proposed permit satisfied the public notice requirements specified in 40 CFR 124.17. The public notice was published in the Farmington Dailey Times on January 7, 1991, and was broadcasted on the local radio station in Farmington. The announcement was also sent to the facility, appropriate State agencies, and interested parties. The public comment period closed on February 21, 1991. No HSWA comments were received from the facility or the public.

II. CHANGES MADE IN FINALIZING THE EPA PERMIT

Below are the changes which EPA made to the Safety-Kleen Farmington Service Center. Some provisions had minor word, typographical corrections or sentence phases changed.

The waste minimization provision has been changed to the following:

1. Waste Minimization

a. Pursuant 40 CFR 264.73(b)(2), the Permittee shall document in the operating record all hazardous waste present at the facility. The Permittee shall document all hazardous waste produced at the facility, by quantity and type and by building/area.

document all hazardous waste produced at the facility, by quantity and type and by building/area.

b. Pursuant to 40 CFR 264.73(b)(9), the Permittee shall maintain in the operating record a certification that the Permittee, as a generator of hazardous waste, has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined to be economically practicable; and that the proposed method of treatment, storage, or disposal is the practicable method which is currently available to the Permittee and that minimizes the present and future threat to human health and the environment. The certification shall include:

1. a narrative description of methods or efforts undertaken during each calendar year to reduce the volume and toxicity of waste generated. This description shall include methods for source reduction and recycling of hazardous waste generated at the facility;
2. the results of the program through documentation of the changes in volume and toxicity of waste actually achieved during each calendar year; and
3. a discussion of the factors that have prevented implementation of source reduction and/or recycling.

The Permittee shall annually submit the certification in accordance with 40 CFR §270.11 to the Administrative Authority. The first certification will be due on March 1, 1992, for the previous year ending December 31, 1990, (e.g., For this permit the first annual certification will be due March 1, 1992 and will include waste minimization efforts done for the 1991 year).

- c. Pursuant to 40 CFR §264.75(h), the Permittee shall include with the Biennial Report a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated.
- d. Pursuant to 40 CFR §264.75(i), the Permittee shall include in the Biennial Report a description of the changes in the volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984.

The Emission Standards provision has been changed to the following:

F. EMISSION STANDARDS FOR PROCESS VENTS AND EQUIPMENT LEAKS

The Permittee must comply with the requirements of 40 CFR §264 Subpart AA and BB, as applicable. Within 90 days of the effective date of this permit, the Permittee shall submit to the Administrative Authority a report which must contain, at a minimum, the following information:

1. An equipment list which includes all of the information required under §264.1064(b)(1) for equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight, and a list of all process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, and air or steam stripping operations that manage hazardous wastes with organic concentrations of at least 10 percent by weight.
2. For the process vents listed above, the amount of vent emissions in lb/hr or kg/hr or kg/yr.
3. If the emissions in paragraph 2 of this section exceed the emission limits cited in §264.1032(a)(1), the report must detail the manner in which compliance will be obtained, i.e., by the reduction of total organic emissions to the limits in §264.1032(a)(1), or reduction by means of a control device per §264.1032(a)(2).
4. If a closed-vent system and control device is installed to comply with the requirements in §264.1032(a)(2), provide the following:
 - a. An implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation (§264.1033(a)(2)).
 - b. The type of control device under §264.1033 to be installed (e.g., vapor recovery, flare, etc...).
5. If the Permittee feels any of the requirements of Module V, Section F, or 40 CFR §264 Subparts AA and BB, are not applicable to this facility, the Permittee must provide justification for this decision as part of the report.

The following was added to the HSWA permit:

H. NOTIFICATION REQUIREMENTS FOR NEW^{LY}-DISCOVERED RELEASES AT SWMU(s)

The Permittee shall notify the Administrative Authority, verbally, within 24 hours of discovery (for any release that has the potential to migrate off-site), and in writing, of any release(s) of hazardous waste including hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other activities undertaken by the facility, no later than fifteen (15) calendar days after discovery. Such newly- discovered releases may be from newly-identified units, from units, for which, based on the findings of the RFA, the Administrative Authority has previously determined that no further investigation was necessary, or from units investigated as part of the RCRA Facility Investigation (RFI). The Administrative Authority may require further investigation and/or Interim Measures for the newly-identified release(s).

III. RESPONSE TO COMMENTS

There were no HSWA comments from the facility or the public.

MODULE V
SPECIAL CONDITIONS PURSUANT TO THE
1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) TO RCRA
FOR SAFETY-KLEEN FARMINGTON SERVICE CENTER, I.D. NUMBER
NMD980698849

A. DEFINITIONS

For purposes of this [MODULE/PERMIT CONDITION] the following definitions shall apply:

"Area of Concern" (AOC) means any discernable unit or area which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit as if it were a SWMU. If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly-identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

"Facility" means all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"Solid Waste Management Unit" (SWMU) means any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

"Hazardous waste" means a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. The term hazardous waste includes hazardous constituent as defined below.

"Generator" means any person, by site, whose act or process produces hazardous waste identified or listed in Part 261 of this chapter or whose act first causes a hazardous waste to become subject to regulation.

"Hazardous constituent" means any constituent identified in Appendix VIII of 40 CFR Part 261, or any constituent identified in Appendix IX of 40 CFR Part 264.

"Administrative Authority" means the [Director] or, in case of HSWA provisions for which the State is not authorized, the U.S. Environmental Protection Agency shall be the Administrative Authority. If, subsequent to the issuance of this permit, these terms are redefined in promulgated regulations, the Administrative Authority may, at its discretion, apply the new definition to this permit.

B. SPECIFIC CONDITIONS

1. Waste Minimization

- a. Pursuant 40 CFR 264.73(b)(2), the Permittee shall document in the operating record all hazardous waste present at the facility. The Permittee shall document all hazardous waste produced at the facility, by quantity and type and by building/area.
- b. Pursuant to 40 CFR 264.73(b)(9), the Permittee shall maintain in the operating record a certification that the Permittee, as a generator of hazardous waste, has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined to be economically practicable; and that the proposed method of treatment, storage, or disposal is the practicable method which is currently available to the Permittee and that minimizes the present and future threat to human health and the environment. The certification shall include:
 1. a narrative description of methods or efforts undertaken during each calendar year to reduce the volume and toxicity of waste generated. This description shall include methods for source reduction and recycling of hazardous waste generated at the facility;
 2. the results of the program through documentation of the changes in volume and toxicity of waste actually achieved during each calendar year; and

3. a discussion of the factors that have prevented implementation of source reduction and/or recycling;

The Permittee shall annually submit the certification in accordance with 40 CFR §270.11 to the Administrative Authority. The first certification will be due March 1992, for the previous year ending December 31, 1991 (e.g. for this permit the first annual certification will be due March 1992 and will include waste minimization efforts done for the 1991 year).

- c. Pursuant to 40 CFR §264.75(h), the Permittee shall include with the Biennial Report a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated.
- d. Pursuant to 40 CFR §264.75(i), the Permittee shall include in the Biennial Report a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984.

2. Dust Suppression

Pursuant to 40 CFR 266.23(b), the Permittee shall not use waste or used oil or any other material, which is contaminated with dioxin, or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

3. Permit Review

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in 40 CFR 270.41.

4. Compliance with Permit

Compliance with this Permit during its term constitutes compliance, for the purposes of enforcement, with 40 CFR Parts 264 and 266 only for those management practices specifically authorized by this permit. The Permittee is also required to comply with Parts 260, 261, 262, and 263 to the extent the requirements of those Parts are applicable.

5. Specific Waste Ban

- a. The Permittee shall not place in any land disposal unit the wastes specified in RCRA Section 3004 after

the effective date of the prohibition unless the Administrator has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this permit.

- b. The Permittee may store wastes restricted under 40 CFR 268 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of 40 CFR 268.50 (a)(2) including, but not limited to, clearly marking each tank or container.
- c. The Permittee is required to comply with the all the requirements of 40 CFR 268.7, as amended, regarding waste analysis. Testing of the waste, or an extract of the waste or treatment residue, must be performed according to the frequency specified in the facility's waste analysis plan as required by 40 CFR 264.13. Changes to the waste analysis plan will be processed as minor modifications pursuant to 40 CFR 270.42. Results of waste analysis shall be maintained in the operating record.
- d. Compliance with a RCRA permit during its term constitutes compliance, for the purpose of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which become effective by statute, or which are promulgated under Part 268 of this chapter restricting the placement of hazardous wastes in or on the land.

C. ADDITIONAL WASTE DISPOSAL BAN REQUIREMENTS

The Permittee shall not land dispose any hazardous waste prohibited by 40 CFR 268 unless:

- 1. the waste meets treatment standards specified in 40 CFR 268.40, .41, .42, or .43;
- 2. a variance from the treatment standards has been granted pursuant to 40 CFR 268.44;
- 3. a petition has been granted on a case-by-case extension to the effective date, pursuant to 40 CFR 268.5;
- 4. a "no-migration" petition has been granted pursuant to 40 CFR 268.6; or
- 5. the surface impoundment is exempt under 40 CFR 268.4.

D. EMISSION STANDARDS FOR PROCESS VENTS AND EQUIPMENT LEAKS

The Permittee must comply with the requirements of 40 CFR §264 Subpart AA and Subpart BB, as applicable. Within 90 days of the effective date of this permit, the Permittee shall submit to the Administrative Authority a report which must contain, at the minimum, the following information:

1. An equipment list which includes all of the information required under § 264.1064 (b)(1) for equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight, and a list of all process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 percent by weight.
2. For the process vents listed above, the amount of vent emissions in lb/hr or kg/hr, and in lb/yr or kg/yr.
3. If the emissions in paragraph 2 of this section exceed the emission limits cited in §264.1032 (a)(1), the report must detail the manner in which compliance will be obtained, i.e., by the reduction of total organic emissions to the limits in §264.1032 (a)(1), or reduction by means of a control device per §264.1032 (a)(2).
4. If a closed-vent system and control device is installed to comply with the requirements in §264.1032 (a)(2), provide the following:
 - a. An implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation (§264.1033(a)(2)).
 - b. The type of control device under §264.1033 to be installed (e.g., vapor recovery, flare, etc...).
5. If the Permittee feels any of the requirements of Module V, Section D, or of 40 CFR §264 Subparts AA and BB, are not applicable to this facility, the Permittee must provide justification for this decision as part of the report.

E. CORRECTIVE ACTION FOR CONTINUING RELEASES

1. Section 3004(u) of RCRA, as amended by HSWA, and 40 CFR 264.101 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste including hazardous constituents from any solid waste management unit (SWMU) at the facility, regardless of when the waste was placed in the unit.

Section 3004 (v) of RCRA as amended by HSWA and Federal regulations promulgated as 40 CFR 264.101(c), require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the permittee demonstrates that, despite the permittee's best efforts, the permittee was unable to obtain the necessary permission to undertake such actions. The permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied. Assurances of financial responsibility for such corrective action shall be provided.

2. If any corrective action is required either at a SWMU identified in the RCRA Facility Assessment (RFA) or at any newly discovered area of concern (AOC) or SWMU, all plans and schedules developed to address the necessary corrective action will require modification of this permit according to the procedures outlined in 40 CFR 270.42.
3. Pursuant to 40 CFR 270.43, failure to submit the information required in Module V or falsification of any submitted information, is grounds for termination of this Permit. The Permittee shall ensure that all notifications and other submissions to the Administrative Authority required in Module V are signed and certified in accordance with 40 CFR 270.11. Two copies and one compatible disk copy each of the notifications and submissions shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

U.S. EPA, Region 6
Hazardous Waste Management
Division
1445 Ross Avenue
Dallas, Texas 75202-2733

New Mexico Environment
Department
Hazardous & Radioactive
Waste Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87503

F. NOTIFICATION REQUIREMENTS FOR EVIDENCE OF NEW AREAS OF CONCERN (AOCs)

1. The Permittee shall notify the Administrative Authority, in writing, of evidence of new AOCs (i.e., discovered during the course of ground water monitoring, field investigations, environmental audits, or other means no later than fifteen (15) calendar days after discovery.
2. The notification shall include, at a minimum, the following information for each new AOC:
 - a. the location of the new AOC in relation to other units;

- b. the type and function of the area;
 - c. the period during which the area may have received waste;
 - d. the specifics on all wastes that the area may have received or is receiving, to the extent available;
 - e. a description of the activity that resulted in the detection of the release(s) of hazardous waste, including hazardous constituents, which resulted in the identification of the new AOC; and
 - f. the results of any sampling and analysis which resulted in the identification of the new AOC.
2. Based on the results of this Notification, the Administrative may require investigation of the area as if it were a SWMU. If shown to be a SWMU during the investigation, the AOC must be reported by the Permittee as a newly-identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that not further action is necessary and notify the Permittee in writing.

G. NOTIFICATION REQUIREMENTS FOR AN ASSESSMENT OF NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S) (SWMUs)

1. The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMU(s) (i.e, a unit not specifically identified during the course of ground water monitoring, field investigations, environmental audits, or other means, no later than fifteen (15) calendar days after discovery.
2. The Permittee shall submit a SWMU Assessment Report to the Administrative Authority no later than ninety (90) calendar days from notification. The SWMU Assessment Report shall describe all results obtained from the SWMU investigation. At a minimum, the Report shall provide the following information for each newly identified SWMU:
 - a. the location of the newly-identified SWMU in relation to other SWMUs;
 - b. the type and function of the unit;
 - c. the general dimensions, capacities, and structural description of the unit (supply and available drawings);
 - d. the period during which the units was operated;

- e. the specified on all wastes that have been or are being managed at the SWMU, to the extent available;
 - f. a description of the activity that resulted in the detection of the release(s) of hazardous waste, including hazardous constituents, which resulted in the identification of the new SWMU; and
 - g. the results of any sampling and analysis required for the purpose of determining whether releases of hazardous wastes including hazardous constituents have occurred, are occurring, or are likely to occur from the unit.
3. Based on the results of this Notification, the Administrative Authority may determine the need for further investigations or corrective measures at specific unit(s) covered in the Notification. If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such investigations. The Administrative Authority will provide requirements for the investigative plan, including the intended objectives and schedule for submittal. The requirements for the investigative plan, including the intended objectives and schedule for submittal. The requirements of this plan shall be implemented through a modification of this module.

H. NOTIFICATION REQUIREMENTS FOR NEW-DISCOVERED RELEASES AT SWMU(S)

The Permittee shall notify the Administrative Authority, verbally, within 24 hours of discovery (for any release that has the potential to migrate off-site), and in writing, of any release(s) of hazardous waste including hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other activities undertaken by the facility, no later than fifteen (15) calendar days after discovery. Such newly-discovered releases may be from newly-identified units, from units for which, based on the findings of the RFA, the Administrative Authority has previously determined that no further investigation was necessary, or from units investigated as part of the RCRA Facility Investigation (RFI). The Administrative Authority may require further investigation and/or Interim Measures for the newly-identified release(s).

I. MODIFICATION OF MODULE V

1. If at any time the Administrative Authority determines that modification of this Module is necessary, he or she may initiate a modification to this Module according to the procedures of 40 CFR 270.41 and 42.

2. Modifications to Module V of this permit do not constitute a reissuance of the permit.

ATTACHMENT A

WASTE ANALYSIS PLAN

WASTE ANALYSIS PLAN

ABSTRACT

Waste Description	EPA Waste Code No.	Facility Capacity ¹	Annual Amount ²
Spent Mineral Spirits Solvents	D001 ²	12,000	50
Bottom Sediment From the Tank	D001 ³	N/A	2
Spent Immersion Cleaner	F002, F004 ³	4,464 3,820	3
Dry Cleaning Waste	F002 ³		6
Spent Solvent (aqueous)	³ Below		3

¹ The facility capacity is in gallons.

² The annual amount is in thousands of gallons.

³ 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.

⁴ The total amount of drummed waste stored in the warehouse will not exceed ~~4,464~~ 3,380 gallons.

WASTE ANALYSIS PLAN

A.1 DESCRIPTION OF WASTES

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 only 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 Attachment A.1 qualitative descriptions follow.

A.1.1 Wastes Resulting From the Parts Washer Service

Spent ~~mineral spirits~~ solvents from parts washers is accumulated in a 12,000 gallon aboveground storage tank via the return and fill station. Containers of spent material ~~typically 16- and 30-gallon containers with five and 19 gallons of waste respectively,~~ 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 solvent~~ waste:

- a. Spent mineral spirits solvent--The spent 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. Bottom sediment in the tank--Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A 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)
- c. Spent Aqueous Parts Cleaning Solvent--may be bulked at the service center into containers that meet DOT specifications or may be co-mingled with the other solvent into the spent solvent tank. It may be toxic using the toxic 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, D043)

- d. Immersion Cleaner--Remains in the drum in which it was originally used until it is received at the recycle center. Drums containing spent solvents (~~typically six gallons of waste~~) are stacked two-high in the drum storage area of the warehouse.

Immersion cleaner remains in the drum in which it was originally used until it is received at the recycle center. Drums containing spent solvents (~~typically six gallons of waste~~) are stacked two-high in the drum storage area of the warehouse. The immersion cleaner may contain chlorinated solvents (F002) and cresylic acid (F004). The ~~new 699~~ formula immersion cleaner is toxic using toxic 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 ~~a the Denton, Texas~~ recycle center for reclamation.

A.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 containers ~~which meet DOT requirements meeting DOT specifications (typically black 46, 30, or split 30-gallon containers)~~. The containers are then palletized, stacked two-high and placed in the container storage area of the warehouse. ~~While a~~ 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 gallons of dry cleaning wastes will be shipped to the Safety-Kleen recycle center in Denton, Texas.~~

A.2 QUALITY CONTROL PROCEDURES

The used solvents are the primary feed stocks for the generation of Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects spent solvents from about 400 customers, most of whom are small quantity generators, and about 5,000 drums containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

Furthermore, as discussed earlier in the Facility Description, all the materials collected at the service center are managed at all times in the closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are

instructed to inspect all materials before returning them to the service centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

In accordance with HWMR 206.B.3, however, Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste collected does not match that designated. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been done or the material must be rejected. If a container with questionable contents is returned to the service center, a sample will be taken and analysis will be performed at the recycle center according to the procedures outlined in section A.3 of this attachment. Pending the results of the analyses the resource recovery branch manager will be notified of any contamination that may have occurred. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

Safety-Kleen controls the use and management of its solvents by:

1. limiting the solvents stored to those compatible with one another and their containers.
2. limiting the uses of each type of solvent (for example, dry cleaning waste is only collected from dry cleaner shops);
3. determining the customer's type of business (i.e., his SIC code is recorded) and the purpose for which he will use the machine.
4. training customers to use the machines properly;
5. training employees to inspect spent solvent and determine whether it is acceptable;
6. indicating on the service document, every time waste is collected, whether the spent solvent meets Safety-Kleen's acceptance criteria.
7. marking each container with the customer's name, address and EPA I.D. number (if required). This information remains on containerized waste until it is accepted at the reclamation facility; and
8. keeping a record of each incoming and outgoing shipment in the operating log at each facility.
9. waste shipments to the ~~Denton Safety-Kleen~~ Recycle Facilities from the Farmington branch are mixed with compatible waste from other service centers.

Safety-Kleen's customers sign a service document containing the following information:

- a. the name, address and EPA I.D. number of the facility to which the waste is being shipped;
- b. the customer's name, address and EPA I.D. number (if required); and
- c. the description and amount of Safety-Kleen solvent waste generated.

In addition, each incoming and outgoing shipment is recorded in the facility's operating log.

If a waste is rejected at the time of service, the customer will be given a choice as to whether he will dispose of the waste himself or require Safety-Kleen's assistance. If he requests Safety-Kleen's assistance, a sample will be drawn using a Coliwas tube and it will be analyzed for flash point and volatile organic compounds. If this analysis does not adequately define the constituents, additional analyses will be performed as necessary (e.g., for semi-volatile organic compounds, base-neutral compounds, PCBs, etc.). If the waste is acceptable at the branch, it will be relabeled and manifested appropriately and then managed with the other wastes. If it is not acceptable, it will either be: (a) managed on a 10 day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and shipped directly to a properly permitted reclamation or disposal facility.

The recycle center ~~located in Denton, Texas~~ sends waste analyses to the service centers. If any sample of the waste solvent does not meet standard acceptance criteria, the recycle center will phone the resource recovery branch manager and alert him to the situation before any processing is done. The resource recovery branch manager has the right to refuse any further service to a business which has returned waste unable to meet acceptable criteria. If the particular acceptance criteria is not met, a determination will be made as to what processing technology is required. The material is processed accordingly which may include transportation to another facility. Each truckload of spent ~~mineral spirits solvent~~ comes from one identifiable Safety-Kleen facility. The recycle center and the branch facility have accurate up-to-date information on the waste constituents which are available in the event of a release.

A.2.1 Qualitative Waste Analysis

- a. **General Inspection Procedures:**
Safety-Kleen visually inspects each drum of waste when it is collected at the customer's location. Safety-Kleen examines the waste for volume, appearance, consistency and odor and is intimately familiar with the characteristics of the waste it receives. Based on the known waste characteristics, Safety-Kleen has established the specific acceptance criteria set forth below, to be used by Safety-Kleen personnel in their visual inspections. These acceptance criteria allow Safety-Kleen to ensure that the waste being picked up is not contaminated.

If a particular drum of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) sample the waste for testing at a Safety-Kleen laboratory, as described below, to determine whether the waste has been contaminated; or (2) reject the drum of waste. In the event the waste is not sampled, Safety-Kleen will notify 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).

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 or they may contract with Safety-Kleen to handle the waste as ten-day transfer. ~~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

The following is a description of the specific acceptance criteria for each waste stream.

1. Spent 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. Spent ~~mineral spirits~~ solvent is collected typically, in 5, 16, and 30 gallon containers which if ~~no additional material has been added to the waste should not contain more than 5, 10 and 10 gallon respectively in containers meeting DOT specifications.~~ 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 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 solvent is also visually inspected for its color. Unused solvent has a clear or 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. ~~In the case of a print shop, the solvent may be clear, green, brown, black, or many colors.~~ Therefore, if the spent solvent does not appear to be ~~green, brown, or black, the expected color,~~ the service representative will sample the waste for possible contamination as described above, or will reject the waste.

2. Immersion Cleaner

~~Safety-Kleen is currently in the process of reformulating its immersion cleaner. Safety-Kleen believes that the new 609 formula immersion cleaner will not be a hazardous waste under the current hazardous waste regulations.~~

a. ~~Old 609~~ Formula 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. ~~In the case of a print shop, the solvent may be clear, green, brown, black, or many colors.~~ Therefore, if the spent immersion cleaner does not appear to be ~~amber, brown or black, the expected color,~~ 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 699~~ Formula Immersion Cleaner

The ~~new 699~~ formula immersion cleaner has been determined to be a hazardous waste, according to TCLP the acceptance criteria and respective descriptions will be the same as those for the ~~existing 609~~ formula immersion cleaner, with the exception of the physical state

criterion. The ~~new 699~~ formula immersion cleaner waste is a single phase, therefore, this criterion is not applicable.

3. Dry Cleaner Wastes

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

a. Spent Filter Cartridges

Spent Filter cartridges are placed in ~~either a 15-gallon ("split 30") drum, that meets DOT requirements typically in a 16 or split 30-gallon container containers meeting DOT specifications.~~ 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 tint. 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.

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 waste type stored at the branch, at least the following analyses must be performed annually. Copies of the results for the annual analyses must be maintained at the branch office for the life of the permit:

A.3.1 Mineral Spirits Solvents

- Flash point (must be greater than 90 F.)
If either of these tests give unacceptable results, the Farmington resource recovery 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
- 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) must be performed on a representative sample of mineral spirits solvent from the Farmington branch at least once each calendar year.

A.3.2 Mineral Spirit Solvent Tank Bottom Sludge and Free Water

- Flash point (Must be greater than 90 F.)
- Analysis for content of lead, cadmium, and chromium.
- pH

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) 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 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
- 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) 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

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) 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

Safety-Kleen maintains an operating log record 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 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;
9. A certification by the permittee no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste;
10. The land ban notices and requirements. These records are kept on file in the resource recovery branch manager's office.

ATTACHMENT A - 1

ANALYTICAL DATA OF WASTE STREAMS



FINAL

1993

ANNUAL

WASTE STREAM

RECHARACTERIZATION

ANALYSES

Allan A. Manteuffel Technical Center

P.O. Box 92050
Elk Grove Village, IL
60009-2050

12555 W. Old Higgins Rd.
Elk Grove Village, IL 60007
Telephone: 312/694-2700
Fax: 312/694-2733

Parts Washer Solvent Sludge

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	benzene 0.5	CCl4 0.5	Cibenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
E-91	CL		< 5000	< 5000	< 5000	< 5000	< 1000	< 5000	< 5000	< 10000	< 5000	< 5000	< 10000
S-92	CL		< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	2.6	0.48	< 0.100	< 0.140
S-92	DE		< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.5	2.6	< 0.1	< 0.14
S-92	HE		< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 2.5	0.6	< 0.5	< 0.7
G-93	FA		< 60	< 60	< 60	< 60	< 120	< 60	< 60	< 250	710	< 60	< 120
G-93	BI		< 60	< 60	< 60	< 60	< 120	< 60	< 60	< 250	100	< 60	< 120
E-93	NM		< 38	< 38.6	< 38	< 38	< 18	< 38	< 38	< 77.1	< 38.7	< 38	< 77
SW-93	NJ-V		< 0.250	< 0.250	< 0.250	< 0.250	< 0.50	< 0.250	< 0.250	< 0.500	0.65	< 0.250	< 0.500
SW-93	TN-D		< 0.1	< 0.1	< 0.1	< 0.1	< 2.0	< 0.1	< 0.1	< 0.2	0.15	< 0.1	< 0.2
SW-93	GA-m		< 0.025	< 0.025	< 0.025	< 0.025	< 0.10	< 0.025	< 0.025	< 0.050	0.054	< 0.025	< 0.050
SW-93	GA-N		< 0.025	< 0.025	< 0.025	< 0.025	< 0.020	< 0.025	< 0.025	< 0.050	0.13	< 0.025	< 0.050
SW-93	WV-N		< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	15	< 50.0	< 1.0	< 1.0	< 50.0
SW-93	WV-N		< 0.250	< 0.250	< 0.250	< 0.250	< 10	< 0.250	< 0.250	1	2	< 0.250	< 0.250
SW-93	WV-N		< 0.025	< 0.025	< 0.025	< 0.025	< 0.100	< 0.025	< 0.025	< 0.500	0.39	< 0.025	< 0.500
SW-93	WV-N		< 0.025	< 0.025	< 0.025	0.23	1.9	< 0.025	< 0.025	< 0.500	0.66	< 0.025	< 0.500
SW-93	KS-E		0.068	< 0.050	< 0.050	< 0.050	10	< 0.050	< 0.050	1.4	0.55	0.12	< 0.100
SW-93	GA-C		0.068	< 0.025	< 0.025	< 0.025	< 10	< 0.025	< 0.025	0.41	0.28	< 0.025	< 0.050
SW-93	GA-M		0.043	< 0.025	< 0.025	< 0.025	< 10	< 0.025	< 0.025	< 0.050	0.23	< 0.025	< 0.050
SW-93	WV-W		0.094	< 0.025	< 0.025	< 0.025	< 40	< 0.025	< 0.025	< 0.050	0.77	0.046	< 0.050
SW-93	GA-G		0.08	< 0.025	< 0.025	< 0.025	< 2.0	< 0.025	< 0.025	< 0.050	0.15	< 0.025	< 0.050
SW-93	TN-N		0.1	< 0.05	< 0.05	< 0.05	< 2.0	< 0.05	< 0.05	0.51	0.26	< 0.05	< 0.10
SW-93	TN-K		< 10	< 10	< 10	< 10	< 0.100	< 10	< 10	49.1	< 10	< 10	< 20
SW-93	NJ-N		< 5.0	< 5.0	< 5.0	< 5.0	< 1.0	< 5.0	< 5.0	23	< 5.0	< 5.0	< 10
SW-93	CL		< 0.25	< 0.25	< 0.25	< 0.25	< 2.0	< 0.25	< 0.25	1.5	0.6	< 0.25	< 0.50
SW-93	CL		< 5.0	< 5.0	< 5.0	< 5.0	< 10	< 5.0	< 5.0	< 10	7.1	< 5.0	< 10
SK-93	NY-N		< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.5	1.3	< 0.1	< 0.14
SW-93	TN-N		< 0.05	< 0.05	< 0.05	< 0.05	< 2	< 0.05	< 0.05	< 0.10	0.1	0.074	< 0.10
SW-93	TN-N		< 12.5	< 12.5	< 12.5	< 12.5	< 200	< 12.5	< 12.5	< 25	< 12.5	20	< 25
SK-93	RE-C		< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.500	< 0.100	< 0.100	< 0.140
		MAX	0.1	0	0	0.23	10	0	15	49.1	710	20	0
		MIN	0.043	0	0	0.23	1.9	0	15	0.41	0.054	0.046	0

Parts Washer Solvent Sludge

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
E-91	CL		9.2	1.019	115	< 5.0	4.5	2.1	1.8	25.1	0.018	< 0.25	< 0.5
S-92	CL				101	< 0.830	2.04	1.74	< 0.310	2.89	0.01	< 0.420	< 0.440
S-92	DE			1.47	> 200	< 0.50	0.53	0.66	0.26	11.08	< 0.002	< 0.30	< 0.45
S-92	HE			1.09	> 200	< 0.45	1.34	1.3	0.08	3.43	< 0.0008	< 0.55	< 0.10
G-93	FA				105	< 2.0	< 4.0	0.35	< 0.20	0.8	< 0.004	< 0.4	< 0.20
G-93	BI				100	< 2.0	< 4.0	0.8	< 0.20	0.9	< 0.004	< 0.4	< 0.20
E-93	NM					< 1.1	1.2	1	< 0.110	29.1	< 0.0040	< 0.053	< 0.11
SW-93	NJ-V		5.41	0.9	113	< 0.050	0.833	0.902	0.012	1.1	< 0.002	< 0.100	< 0.010
SW-93	TN-D		5.7	0.93	122	< 0.050	0.12	0.14	0.028	0.7	< 0.002	< 0.100	< 0.010
SW-93	GA-m		4.4	0.81	125	< 0.050	0.23	0.159	0.006	4.3	< 0.002	< 0.100	< 0.010
SW-93	GA-N		7.32	0.81	130	< 0.050	0.521	0.19	0.018	2.4	< 0.002	< 0.100	< 0.010
SW-93	WV-N		7.19	0.8	120	< 0.050	0.064	0.058	< 0.005	0.089	< 0.002	< 0.100	< 0.010
SW-93	WV-N		7.54	0.8	122	< 0.050	0.038	0.022	< 0.005	< 0.05	< 0.002	< 0.100	< 0.010
SW-93	WV-N		8.77	0.84	129	< 0.050	3	1.2	0.018	0.445	< 0.002	< 0.100	< 0.010
SW-93	WV-N		8.21	0.81	120	< 0.050	0.075	0.037	< 0.005	0.307	< 0.002	< 0.100	< 0.010
SW-93	KS-E		8.37	0.98	120	< 0.050	0.227	1.4	0.012	45	< 0.002	< 0.100	< 0.010
SW-93	GA-C		7.32	1.08	114	< 0.050	1.848	0.497	0.033	0.919	< 0.002	< 0.100	< 0.010
SW-93	GA-M		8.8	1.12	118	0.194	0.885	0.439	0.061	0.464	< 0.002	< 0.100	< 0.010
SW-93	WV-W		9.4	0.78	115	< 0.050	0.1	0.024	0.007	0.238	< 0.002	< 0.100	< 0.010
SW-93	GA-G		7.28	0.83	83	< 0.050	0.747	0.761	0.062	0.317	< 0.002	< 0.100	< 0.010
SW-93	TN-N		6.68	1.4	120	< 0.050	0.245	0.307	0.037	0.447	< 0.002	< 0.100	< 0.010
SW-93	TN-K		6.48	0.9	122	< 0.050	1.2	0.573	0.123	3.5	0.055	< 0.100	< 0.010
SW-93	NJ-N		8.91	1.343	118	< 0.050	0.435	0.618	0.307	2.9	< 0.002	< 0.100	< 0.010
SW-93	CL		9.27	1.1	114	< 0.050	0.11	0.054	0.009	0.29	< 0.002	< 0.100	< 0.010
SW-93	CL		8.26	0.92	119	< 0.050	0.054	0.07	0.018	0.079	< 0.002	< 0.100	< 0.010
SK-93	NY-N		7.84	0.93	114	< 0.45	1.468	3.853	0.741	14.88	0.0015	< 0.550	< 0.10
SW-93	TN-N		6.4	0.73	118	0.050	1.2	1.1	0.159	1.9	< 0.002	< 0.100	< 0.010
SW-93	TN-N		8.69	1.2	168	< 0.05	0.95	0.48	0.46	8.18	0.006	< 0.100	0.012
SK-93	RE-C		7.41	0.88	> 200	< 0.45	0.331	0.7755	< 0.050	1.379	< 0.0008	< 0.550	< 0.10
		MAX	9.4	1.47	168	0.194	4.5	3.653	1.8	45	0.055	0	0.012
		MIN	4.4	0.73	93	0.194	0.038	0.022	0.006	0.079	0.0015	0	0.012

Parts Washer Distillation Bottoms Wastes

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Lmt	benzene 0.5	CCl4 0.5	Clbenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
M-90	CL		< 0.10	< 0.10	< 0.10	< 0.10	< 0.20	< 0.10	< 0.10	< 2.0	< 0.10	< 0.10	< 0.20
W-90	DE		< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 2.0	< 0.10	0.17	< 0.20
W-90	EL		< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 2.0	< 0.10	< 0.10	< 0.20
W-90	HE		< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 2.0	< 0.10	< 0.10	< 0.20
M-90	LE		< 0.10	< 0.10	< 0.10	< 0.10	0.93	< 0.10	< 0.10	< 2.0	0.61	0.12	< 0.20
M-90	MA		< 0.10	< 0.10	< 0.10	0.15	< 0.20	< 0.10	< 0.10	< 2.0	< 0.10	< 0.10	< 0.20
C-90	RE		< 0.05	< 0.05	< 0.05	< 0.05	< 0.1	< 0.05	< 0.05	< 1	< 0.05	< 0.05	< 0.1
E-91	CL		< 0.025	< 0.025	< 0.025	< 0.025	< 200	< 0.025	< 0.025	< 0.05	< 0.025	< 0.025	< 0.05
E-91	EL												
S-92	CL		< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.500	< 0.100	< 0.100	< 0.140
S-92	DE		< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	38	< 0.1	< 0.1	< 0.2
S-92	HE		< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.5	3.3	12.6	< 0.14
N-92	CA73		< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 10	8.4	< 5.0	< 5.0
		MAX	0	0	0	0.15	0.93	0	0	38	8.4	12.6	0
		MIN	0	0	0	0.15	0.93	0	0	38	0.61	0.12	0

Parts Washer Distillation Bottoms Wastes

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
		Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5
M-90	CL		8	na	> 160	< 0.5	0.31	0.49	< 0.01	1.8	< 0.001	< 0.2	< 0.01
W-90	DE		7.5	0.79	80	< 0.05	0.9	0.57	< 0.05	11	< 0.01	< 0.05	< 0.05
W-90	EL		7.5	na	> 200	< 0.05	< 0.3	0.44	< 0.05	0.8	< 0.01	< 0.05	< 0.05
W-90	HE		5.5	na	135	< 0.05	0.7	0.19	< 0.05	1.9	< 0.01	< 0.05	< 0.05
M-90	LE		8	na	> 160	< 0.5	0.8	1.2	0.42	0.3	< 0.001	< 0.2	< 0.01
M-90	MA		8.5	na	125	< 0.5	< 1.0	0.062	0.012	0.84	< 0.001	< 0.2	< 0.01
C-90	RE		7.5	0.86	> 160	< 50	1	< 1	< 1	13	< 0.05	< 50	< 30
E-91	CL		9.4	na	> 160	< 5.0	32.9	7.7	8.3	122	< 0.002	< 0.5	< 0.5
E-91	EL		7.2	na	> 160	< 5.0	28.8	8.8	8.8	132	< 0.002	< 1.0	< 0.5
S-92	CL				168	< 0.500	0.83	0.58	< 0.250	1.38	< 0.00200	< 0.300	< 0.450
S-92	DE			0.8978	169	< 0.50	0.51	0.85	< 0.25	7.8	< 0.002	< 0.30	< 0.45
S-92	HE			0.88	180	< 0.45	0.48	0.31	< 0.05	8.12	0.005	< 0.55	< 0.10
N-92	CA73		7.8	0.88	195	< 0.30	48.8	14.4	8.82	189	0.07	< 1.0	< 0.40
		MAX	9.4	0.8978	195	0	48.8	14.4	8.92	189	0.07	0	0
		MIN	5.5	0.79	80	0	0.31	0.082	0.012	0.8	0.005	0	0

Paint Gun Cleaner Wastes

TCLP Semi Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	cresol 200	2,4-DNT 0.13	Cl6-benz 0.13	Cl6-13-but 0.5	Cl6-eth 3	nitrobenz 2	Cl5-phenol 100	pyridine 5	2,4,6-TCP 400	2,4,6-TCP 2
W-90	DE		< 0.033	< 0.033	< 0.033	< 0.033	< 0.033	< 0.033	< 0.17	< 0.17	< 0.033	< 0.033
W-90	DO		9.7	< 2.6	< 2.6	< 2.6	< 2.6	< 2.6	< 13	< 13	< 2.6	< 2.6
E-91	LE		< 10.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 25.0	< 10.0	< 25.0	< 5.0
E-91	DO		< 10.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 25.0	< 10.0	< 25.0	< 5.0
S-92	DE		0.12	< 0.036	< 0.070	< 0.095	< 0.080	< 0.031	< 0.450	< 0.045	< 0.022	0.19
S-92	LE		0.421	< 0.036	< 0.070	< 0.095	< 0.080	< 0.031	< 0.450	< 0.045	< 0.022	< 0.030
E-91	LE		< 10.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 25.0	< 10.0	< 25.0	< 5.0
E-91	DO		< 360	< 180	< 180	< 180	< 180	< 180	< 900	< 360	< 900	< 180
S-92	NY06		0.198	< 0.036	< 0.070	< 0.095	< 0.080	< 0.031	< 0.450	0.045	< 0.022	< 0.030
E-93	CO		< 2000	< 2000	< 2000	< 2000	< 2000	< 2000	< 10000	< 4000	< 10000	< 2000
		MAX	9.7	0	0	0	0	0	0	0.045	0	0.19
		MIN	0.12	0	0	0	0	0	0	0.045	0	0.19

Paint Gun Cleaner 5 Wastes

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Lmt	benzene 0.5	CCl4 0.5	Cibenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
E-91	LE		< 2200	< 2200	< 2200	< 2200	< 5.0	< 2200	< 2200	6500	< 2200	< 2200	< 4400
E-91	DO		< 500	< 500	< 500	< 500	< 180	< 500	< 500	< 1000	< 500	< 500	< 1000
S-92	NY08		0.12	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	220	< 0.1	< 0.1	< 0.14
SW-93	KS-V		< 2500	< 2500	< 2500	< 2500	< 0.75	< 2500	< 2500	62000	< 2500	< 2500	< 5000
SW-93	GA-m		< 62.5	< 62.5	< 62.5	< 62.5	< 1.0	< 62.5	< 62.5	2700	< 62.5	< 62.5	< 125
SW-93	GA-N		< 2.5	< 2.5	< 2.5	< 2.5	< 0.020	< 2.5	< 2.5	< 5.0	< 2.5	< 2.5	< 5.0
SW-93	GA-C		< 250	< 250	< 250	< 250	< 1.0	< 250	< 250	11000	< 250	< 250	< 500
SW-93	KS-E		< 250	< 250	< 250	< 250	< 10	< 250	< 250	6200	< 250	< 250	< 500
SW-93	KS-W		< 250	< 250	< 250	< 250	< 1.0	< 250	< 250	11000	< 250	< 250	< 500
SW-93	TN-N		< 2500	< 2500	< 2500	< 2500	< 200	< 2500	< 2500	80000	< 2500	< 2500	< 5000
SW-93	TN-K		< 2500	< 2500	< 2500	< 2500	< 100	< 2500	< 2500	190000	< 2500	< 2500	< 5000
SW-93	NJ-N		< 2500	< 2500	< 2500	< 2500	< 1000	< 2500	< 2500	21000	< 2500	< 2500	< 5000
SK-93	NY-C		89	< 50	< 50	< 50	< 50	< 50	< 50	100000	< 50	140	< 100
SK-93	NY-C		88	< 50	< 50	< 50	< 50	< 50	< 50	80000	< 50	120	< 100
SK-93	NY-W		< 50	< 50	< 50	< 50	< 50	< 50	< 50	30000	690	150	< 100
SK-93	NY-W		< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 250	< 50	< 50	< 100
SK-93	NY-W		< 50	< 50	< 50	< 50	< 50	< 50	< 50	30000	< 50	< 50	< 100
SK-93	NY-N		70	< 50	< 50	< 50	< 50	< 50	< 50	60000	88	230	< 100
SK-93	NY-N		67	< 50	< 50	< 50	< 50	< 50	< 50	65000	64	110	< 100
SK-93	NY-D		120	< 50	< 50	< 50	< 50	< 50	< 50	60000	190	600	< 100
SK-93	NY-D		< 50	< 50	< 50	< 50	< 50	< 50	< 50	40000	< 50	< 50	< 100
SK-93	NY-D		90	< 50	< 50	< 50	< 50	< 50	< 50	80000	270	440	< 100
SK-93	NY-D		< 50	< 50	< 50	< 50	< 50	< 50	< 50	20000	< 50	64	< 100
SK-93	NY-N		74	< 50	< 50	< 50	< 50	< 50	< 50	45000	210	< 50	< 100
SW-93	IN		< 2500	< 2500	< 2500	< 2500	< 100	< 2500	< 2500	82000	< 2500	< 2500	< 5000
SW-93	IN		< 12	< 12	< 12	< 12	< 100	< 12	< 12	46	< 12	< 12	< 25
SW-93	IN		< 2500	< 2500	< 2500	< 2500	< 100	< 2500	< 2500	70000	< 2500	< 2500	< 5000
SW-93	IN		< 2500	< 2500	< 2500	< 2500	< 100	< 2500	< 2500	71000	< 2500	< 2500	< 5000
		MAX	120	0	0	0	0	0	0	100000	690	600	0
		MIN	0.12	0	0	0	0	0	0	46	54	64	0

Paint Gun Cleaner 5 Wastes

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
E-91	LE		6.2	0.864	73	< 1.0	1.4	0.41	0.66	< 0.5	< 0.002	< 0.1	< 0.1
E-91	DO		6.6	0.731	84	< 1.6	8.2	0.73	1.8	1.9	< 0.016	< 0.16	< 0.16
S-92	NY06			0.86	< 73	< 0.45	0.25	< 0.05	0.06	0.38	< 0.0006	< 0.55	< 0.10
SW-93	NJ-V		5.99	0.72	> 36	0.07	0.64	0.005	0.16	0.14	< 0.002	< 0.100	< 0.010
SW-93	GA-m		6.61	0.98	38	< 0.050	0.916	0.011	0.013	0.095	< 0.002	< 0.100	< 0.010
SW-93	GA-N		7.47	0.78	39	< 0.050	0.969	0.003	< 0.005	< 0.050	< 0.002	< 0.100	< 0.010
SW-93	GA-C		7.55	0.79	< 45	< 0.500	< 0.050	< 0.030	< 0.050	< 0.500	< 0.002	< 1.0	< 0.100
SW-93	KS-E		7.6	0.83	< 45	< 0.050	0.079	< 0.003	< 0.005	< 0.050	< 0.002	< 0.100	< 0.010
SW-93	KS-W		6.01	0.82	37	< 0.050	0.31	0.006	0.085	< 0.050	< 0.002	< 0.100	< 0.010
SW-93	TN-N		8.12	0.7	< 44	< 0.050	0.104	0.054	0.625	3.1	0.008	< 0.100	< 0.010
SW-93	TN-K		7.01	0.86	< 45	< 1.0	< 0.100	< 0.060	0.18	< 1.0	0.055	< 2.0	< 0.200
SW-93	NJ-N		6.42	0.885	< 44	< 0.500	100	0.53	47	162	< 0.0002	2.7	< 0.100
SK-93	NY-C		4.6	0.83	< 62	< 4.5	1.72	< 0.50	1.25	< 3.5	< 0.04	< 0.359	< 1.0
SK-93	NY-C		4.1	0.83	< 68	< 4.5	2.34	< 0.50	1.13	< 3.5	< 0.04	< 0.359	< 1.0
SK-93	NY-W		4.7	0.87	< 73	< 4.5	1	< 0.50	1.25	3.52	< 0.04	< 0.359	< 1.0
SK-93	NY-W		6.16	0.89	< 65	< 0.45	0.5075	< 0.050	3.9	< 0.35	< 0.002	< 0.550	< 0.10
SK-93	NY-W		5.06	0.9	< 66	< 4.5	13.34	< 0.50	16.16	76.25	< 0.04	< 0.359	< 1.0
SK-93	NY-N		4.9	0.85	< 68	< 4.5	< 0.50	< 0.50	1.96	6.16	< 0.04	< 0.359	< 1.0
SK-93	NY-N		4.68	0.84	< 64	< 4.5	0.97	< 0.50	1.03	< 3.5	< 0.04	< 0.359	< 1.0
SK-93	NY-D		4.4	0.84	< 75	< 4.5	7.765	< 0.50	< 0.50	63.36	< 0.04	< 0.359	< 1.0
SK-93	NY-D		4.77	0.86	< 70	< 4.5	0.705	< 0.50	< 0.50	< 3.5	< 0.04	< 0.359	< 1.0
SK-93	NY-D		4.02	0.84	< 60	< 4.5	< 0.50	< 0.50	< 0.50	< 3.5	< 0.04	< 0.359	< 1.0
SK-93	NY-D		4.43	0.84	< 63	< 4.5	< 0.50	< 0.50	< 0.50	< 3.5	< 0.04	< 0.359	< 1.0
SK-93	NY-N		4.25	0.84	< 67	< 4.5	< 0.50	< 0.50	< 0.50	< 3.5	< 0.04	< 0.359	< 1.0
SW-93	IN		5.92	0.71	< 38	< 0.090	1.95	0.326	0.0654	0.387	< 0.002	< 0.425	< 0.015
SW-93	IN		5.9	0.76	< 38	0.124	4.34	0.436	0.103	0.559	< 0.020	< 0.525	0.0349
SW-93	IN		6.89	0.8	< 50	< 0.900	< 0.400	0.109	< 0.200	< 1.750	< 0.002	< 4.250	< 0.150
SW-93	IN		5.56	0.77	< 50	< 0.900	< 0.400	< 0.100	< 0.200	< 1.750	< 0.002	< 4.250	< 0.150
		MAX	8.12	0.98	84	0.124	100	0.73	47	162	0	2.7	0.0349
		MIN	4.02	0.7	37	0.07	0.079	0.003	0.013	0.095	0	2.7	0.0349

Nonchlorinated Water Wastes

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
W-90	BU		8.5	na	na	< 0.05	1	< 0.05	< 0.05	0.1	< 0.01	< 0.05	< 0.05
M-90	CL		9	na	na	< 0.5	0.63	0.35	0.034	0.84	< 0.001	< 0.2	< 0.01
W-90	DE		8.5	na	na	< 0.05	1.7	0.43	0.19	0.8	< 0.01	< 0.5	0.06
W-90	DO		7.5	na	na	< 0.05	0.9	0.17	0.16	2.6	< 0.01	< 0.05	< 0.05
W-90	EL		7	na	na	< 0.05	3.1	0.62	0.22	1.8	0.011	< 0.05	< 0.05
M-90	LE		6.5	na	na	< 0.5	0.82	0.16	0.036	0.86	0.001	< 0.2	< 0.01
M-90	LI		7	na	na	< 0.5	0.26	< 0.01	0.012	< 0.1	0.031	< 0.2	< 0.02
M-90	PE		6	na	na	0.95	3.5	0.046	0.047	< 0.1	< 0.001	< 0.2	< 0.01
C-90	RE		10	na	na	< 1	0.11	< 0.02	0.02	0.5	< 0.002	< 1	< 0.5
E-91	CL		8.3			< 1.0	0.35	0.96	0.53	3.2	< 0.002	< 0.5	< 0.1
S-92	CL				> 202	< 5.00	< 5.00	0.5	< 2.50	6.97	< 0.0800	< 0.330	< 4.50
N-92	CA76		7	1.01	> 200	< 0.30	0.3	< 0.20	< 0.20	< 0.80	< 0.05	< 1.0	< 0.40
SK-93	RE-C		7.55	1.02	> 200	< 0.45	0.26	< 0.050	< 0.050	< 0.35	0.061	< 0.550	< 0.10
		MAX	10	1.02	0	0.95	3.5	0.96	0.53	6.97	0.061	0	0.06
		MIN	6	1.01	0	0.95	0.11	0.046	0.012	0.1	0.001	0	0.06

Nonchlorinated Water Wastes PWS

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
E-91	EL		6.5	na		< 1.0	0.24	0.55	0.11	0.83	0.003	< 1	< 0.1
S-92	CL			na	116	< 4.55	< 5.65	0.44	2.25	1.69	< 0.0800	< 0.370	< 0.120
		MAX	6.5	0	116	0	0.24	0.55	2.25	1.69	0.003	0	0
		MIN	6.5	0	116	0	0.24	0.44	0.11	0.83	0.003	0	0

Nonchlorinated Water Wastes IC

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
E-91	EL		9.5			1.1	11.4	1.8	5.6	36.7	0.022	< 1.0	< 0.1
		MAX	9.5	0	0	1.1	11.4	1.8	5.6	36.7	0.022	0	0
		MIN	9.5	0	0	1.1	11.4	1.8	5.6	36.7	0.022	0	0

Used Immersion Cleaner 699

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	benzene 0.5	CCl4 0.5	Clbenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
E-91	CL		< 2500	< 5000	< 2500	< 2500	< 10.0	< 2500	< 2500	< 5000	< 2500	< 2500	< 5000
E-91	LE		< 3300	< 3300	< 3300	< 3300	< 5.0	< 3300	< 3300	< 6600	< 3300	< 3300	< 6600
E-91	EL		< 2500	< 2500	< 2500	< 2500	< 100	< 2500	< 2500	< 5000	< 2500	< 2500	< 5000
S-92	CL		4.8	< 0.500	113	< 0.500	38.2	1.8	< 0.500	43.8	353	24.8	< 0.700
SW-93	TN-D		< 10	< 10	41	< 10	< 30.0	< 10	< 10	< 20	350	40	< 20
SW-93	KS-D		< 1.0	< 1.0	< 1.0	< 1.0	29	< 1.0	< 1.0	< 50	18	< 1.0	< 50
SW-93	WV-N		< 1.0	< 1.0	< 1.0	4.8	< 10	< 1.0	< 1.0	< 50	< 1.0	< 1.0	< 50
SW-93	KS-E		< 5	< 5	< 5	< 5	< 10	< 5	< 5	< 10	< 5	< 5	< 10
SW-93	KS-W		< 1.0	< 1.0	< 1.0	< 1.0	< 10	< 1.0	< 1.0	< 2.0	< 1.0	< 1.0	< 2.0
SW-93	WV-W		< 2.5	< 2.5	< 2.5	< 2.5	< 80	< 2.5	< 2.5	< 5.0	8.7	< 2.5	< 5.0
SW-93	TN-N		< 250	< 250	< 250	< 250	< 1000	< 250	< 250	< 500	< 250	< 250	< 500
SW-93	TN-K		< 250	< 250	< 250	< 250	< 1000	< 250	< 250	< 500	880	< 250	< 500
SW-93	CL		< 2500	< 2500	< 2500	< 2500	< 10	< 2500	< 2500	14000	< 2500	< 2500	< 5000
SW-93	CL		< 250	< 250	< 250	< 250	8600	< 250	< 250	< 500	280	< 250	< 500
SK-93	NY-W		< 50	< 50	88	< 50	640	< 50	< 50	< 250	460	< 50	< 100
SK-93	NY-W		< 50	< 50	58	< 50	480	< 50	< 50	< 250	180	< 50	< 100
SK-93	NY-N		< 50	< 50	180	< 50	1400	< 50	< 50	< 250	440	< 50	< 100
SK-93	NY-N		< 50	< 50	82	< 50	410	< 50	< 50	< 250	340	< 50	< 100
SK-93	NY-W		< 50	< 50	85	< 50	890	< 50	< 50	< 250	370	< 50	< 100
SK-93	RE-W		< 50	< 50	< 50	< 50	240	< 50	< 50	< 250	170	< 50	< 100
SK-93	RE-C		< 50	< 50	< 50	< 50	180	< 50	< 50	< 250	82	< 50	< 100
SW-93	IN		< 250	< 250	< 250	< 250	< 1000	< 250	< 250	< 500	170	< 250	< 500
SW-93	IN		< 250	< 250	< 250	< 250	< 1000	< 250	< 250	< 500	190	< 250	< 500
SW-93	IN		< 620	< 620	< 620	< 620	< 1000	< 620	< 620	350	270	< 620	< 1200
SW-93	IN		< 620	< 620	< 620	< 620	< 1000	< 620	< 620	770	190	< 620	< 1200
SK-93	NY-N		< 50	< 50	68	< 50	810	< 50	< 50	< 250	300	< 50	< 100
		MAX	4.8	0	180	4.8	6600	1.8	0	14000	550	40	0
		MIN	4.8	0	41	4.8	29	1.8	0	43.8	8.7	24.8	0

Used Immersion Cleaner 699

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
E-91	CL		9.6	0.945	> 160	2.1	1.4	11.6	50.6	65.1	< 0.002	< 0.1	0.1
E-91	LE		9.6	0.938	> 160	< 5.0	0.54	12.9	4.7	43.4	< 0.002	< 0.5	< 0.5
E-91	EL		9.8	0.958	> 160	1.8	0.58	9.2	1.5	86.8	< 0.002	< 2.0	< 0.1
S-92	CL				> 200	< 5.00	< 5.00	10.6	< 2.50	63.8	< 0.0800	< 0.330	< 0.110
SW-93	TN-D		10.79	0.85	141	0.14	0.007	0.004	0.027	0.38	0.011	< 0.100	< 0.010
SW-93	KS-D		11.38	0.91	145	< 0.050	0.018	0.978	< 0.005	0.641	< 0.002	< 0.100	< 0.010
SW-93	WV-N		10.64	0.98	147	< 0.050	0.026	0.167	< 0.005	< 0.050	< 0.002	< 0.100	< 0.010
SW-93	KS-E		10.93	0.98	145	< 0.050	0.049	6.2	0.011	0.082	< 0.002	< 0.100	< 0.010
SW-93	KS-W		10.1	0.92	143	< 0.050	0.049	0.216	0.012	0.716	< 0.002	< 0.100	< 0.010
SW-93	WV-W		10.5	0.92	148	< 0.050	0.049	0.004	0.009	0.129	< 0.002	< 0.100	< 0.10
SW-93	TN-N		10.77	0.83	147	< 1.0	0.133	0.898	0.213	8	< 0.002	< 2.0	< 0.200
SW-93	TN-K		9.93	0.81	141	< 1.0	2.9	80	1.1	818	0.003	< 2.0	< 0.200
SW-93	CL		9.68	1	> 200	< 0.050	0.72	0.045	0.032	0.374	0.003	< 0.100	< 0.010
SW-93	CL		10.93	0.68	145	0.12	0.17	1.38	0.086	4.73	0.04	< 0.100	< 0.010
SK-93	NY-W		9.82	0.94	> 200	< 4.5	1.18	5.778	1.58	24.42	< 0.04	< 0.359	< 1.0
SK-93	NY-W		9.97	0.93	143	< 4.5	0.77	25.18	3.75	137.7	0.072	< 0.359	< 1.0
SK-93	NY-N		9.68	0.93	> 200	< 4.5	1.18	3187	3.75	470.1	< 0.04	< 0.359	< 1.0
SK-93	NY-N		9.77	0.94	> 200	< 4.5	0.88	87.35	1.66	28.18	< 0.04	< 0.359	< 1.0
SK-93	NY-W		9.8	0.9	> 200	< 4.5	< 0.50	3.43	< 0.50	3.77	0.05	< 0.359	< 1.0
SK-93	RE-W		9.87	0.98	< 200	< 4.5	1.88	8.05	0.99	44.88	0.068	< 0.359	< 1.0
SK-93	RE-C		9.91	0.95	> 200	< 4.5	0.9	20.38	10.2	44.43	0.08	< 0.359	< 1.0
SW-93	IN		10.62	0.98	141	2.03	0.229	4.58	0.453	20.2	< 0.002	< 0.220	< 0.020
SW-93	IN		10.58	0.75	143	1.83	0.298	8.32	1.49	8.93	0.0057	< 0.220	< 0.020
SW-93	IN		11.14	0.82	142	1.41	0.589	0.821	0.608	0.794	< 0.002	< 0.220	0.035
SW-93	IN		11.11	0.84	147	1.13	0.599	0.918	0.584	0.94	< 0.002	< 0.220	0.026
SK-93	NY-N		9.67	0.93	> 200	< 0.45	0.8	5.73	< 0.50	11.01	< 0.04	< 0.359	< 1.0
		MAX	11.38	1	147	2.1	2.9	3187	50.5	618	0.08	0	0.1
		MIN	9.6	0.68	141	0.12	0.007	0.004	0.009	0.082	0.003	0	0.026

Dry Cleaning Filter Powder

Physical Properties and TCLP Metals Analysis, ppm

Parameter		pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
Reg. Limit		<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5
LAB	SITE											
S-92	NY		1.32	> 200	< 0.45	0.32	< 0.05	0.11	< 0.35	< 0.0008	< 0.55	< 0.10
SW-93	KS-E	6.91	1.54	> 200	< 0.050	0.096	0.015	0.018	< 0.050	< 0.002	< 0.100	< 0.010
SW-93	KS-W	5.94	0.92	> 200	< 0.050	0.136	0.022	0.0189	0.06	< 0.002	< 0.100	< 0.010
SW-93	IN	6.47	0.8	> 200	< 0.250	0.137	0.0918	0.298	0.129	< 0.002	< 0.220	< 0.020
SW-93	IN	6.2	0.75	> 200	< 0.250	0.16	0.108	0.288	< 0.100	< 0.002	< 0.220	< 0.020
SW-93	IN	6.68	0.76	> 200	< 0.250	0.102	0.0554	0.237	< 0.100	< 0.002	< 0.220	< 0.020
SW-93	IN	6.66	0.73	> 200	< 0.250	0.0849	0.0635	0.238	0.161	< 0.002	< 0.220	< 0.020
		MAX	6.91	1.54	0	0	0.32	0.108	0.298	0.181	0	0
		MIN	5.94	0.73	0	0	0.0849	0.015	0.018	0.06	0	0

Dry Cleaning Filter Powder

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	benzene 0.5	CCl4 0.5	Clbenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
S-92	NY		< 25.0	< 25.0	< 25.0	< 25.0	< 25.0	< 25.0	< 25.0	< 125.0	1315	< 25.0	< 35.0
SW-93	KS-E		< 5	< 5	< 5	< 5	< 0.100	< 5	< 5	< 10	< 5	< 5	< 10
SW-93	KS-W		< 5	< 5	< 5	< 5	< 0.040	< 5	< 5	< 10	200	< 5	< 10
SW-93	IN		< 5.0	< 5.0	< 5.0	< 5.0	< 1.0	< 5.0	< 5.0	< 10	230	< 5.0	< 10
SW-93	IN		< 5.0	< 5.0	< 5.0	< 5.0	< 1.0	< 5.0	6.2	7.6	< 5.0	< 5.0	< 10
SW-93	IN		< 5.0	< 5.0	< 5.0	< 5.0	< 1.0	< 5.0	< 5.0	15	200	< 5.0	< 10
SW-93	IN		< 5.0	< 5.0	< 5.0	< 5.0	< 1.0	< 5.0	< 5.0	150	150	< 5.0	< 10
		MAX	0	0	0	0	0	0	6.2	150	1315	0	0
		MIN	0	0	0	0	0	0	6.2	7.6	150	0	0

Dumpster Mud Wastes

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Llimit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
M-90	CL		10	na	115	< 0.5	0.85	0.8	0.08	2.2	0.002	< 0.2	< 0.01
W-90	DE		7	na	80	< 0.05	1	0.84	< 0.05	570	< 0.01	< 0.05	< 0.05
W-90	EL		8	na	115	< 0.05	0.9	1	< 0.05	1.3	< 0.01	< 0.05	< 0.05
M-90	LE		6.5	na	85	< 0.5	0.47	2	0.01	1.3	< 0.001	< 0.2	< 0.01
C-90	RE		7.9	1.2	85	< 1	0.41	2.8	0.02	4.6	< 0.002	< 1	< 0.5
M-90	CL		7.5	na	> 160	< 0.5	0.28	1.3	0.18	0.8	< 0.001	< 0.2	< 0.01
E-91	HE		8	1.503	113	< 1.0	1.2	0.71	< 0.1	2.4	< 0.002	< 0.1	< 0.1
S-92	CL				92	< 1.90	< 2.80	2	< 0.930	18	< 0.0250	0.350	< 0.350
S-92	HE			1.4	130	< 0.45	1.52	2.93	0.08	0.87	< 0.0008	< 0.55	< 0.10
S-92	NJ			0.85	118	< 0.94	2.3	1.27	0.31	7.75	< 0.008	< 0.53	< 0.1
S-92	NY			0.97	125	< 0.57	1.24	1.08	0.18	0.46	0.004	< 0.54	0.1
N-92	CA72		7.5		130	< 0.30	0.94	1.15	< 0.20	4.01	< 0.05	< 1.0	< 0.40
		MAX	10	1.503	130	0	2.3	2.93	0.31	570	0.004	0	0.1
		MIN	6.5	0.85	80	0	0.28	0.71	0.01	0.87	0.002	0	0.1

IC Dumpster Mud 699

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Llimit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
E-91	CL		10.1	1.108	124	< 1.0	1.5	2	2.2	14.9	< 0.002	< 0.1	< 0.1
SW-93	CL		9.83	0.87	144	< 0.50	0.026	0.019	0.008	0.22	< 0.002	< 0.100	< 0.010
		MAX	10.1	1.108	144	0	1.5	2	2.2	14.9	0	0	0
		MIN	9.83	0.87	124	0	0.026	0.019	0.008	0.22	0	0	0

IC Dumpster Mud 609

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Llimit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
E-91	CL		8.8	1.313	77	< 1.0	0.33	0.87	< 0.1	0.87	< 0.002	< 0.1	< 0.1
		MAX	8.8	1.313	77	0	0.33	0.87	0	0.87	0	0	0
		MIN	8.8	1.313	77	0	0.33	0.87	0	0.87	0	0	0

Chlorinated Water Wastes

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter Reg. Limit	pH <2; >12.5	SG na	FP < 140	As 5	Ba 100	Cd 1	Cr 5	Pb 5	Hg 0.2	Se 1	Ag 5
M-90	CH		7	na	na	< 0.5	0.37	< 0.01	0.018	< 0.1	< 0.001	< 0.2	< 0.01
M-90	CL		10	na	95	< 0.5	0.74	0.18	10	12	0.048	< 0.2	< 0.01
W-90	DE		10	na	na	0.17	1.2	0.14	4.9	9.7	0.012	< 0.05	< 0.05
M-90	LE		9.5	na	na	< 0.5	< 0.2	0.18	0.45	2.9	0.81	< 0.2	< 0.01
M-90	MA		7	na	na	< 0.5	< 1.0	< 0.01	0.18	< 0.1	< 0.001	< 0.2	< 0.01
M-90	PE		7	na	na	< 0.5	< 0.2	< 0.01	< 0.01	0.12	< 0.001	< 0.2	< 0.01
E-91	CL		8.3	na	na	< 1.0	0.19	0.21	0.3	0.2	< 0.002	< 0.2	< 0.1
		MAX	10	0	95	0.17	1.2	0.21	10	12	0.81	0	0
		MIN	7	0	95	0.17	0.19	0.14	0.018	0.12	0.012	0	0

Chlorinated Water Wastes

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	benzene 0.5	CCl4 0.5	Clbenz 100	CHCl3 8	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
M-90	CH		< 0.10	< 0.10	< 0.10	< 0.10	> 4.4	< 0.10	< 0.10	< 2.0	1.3	2.1	< 0.20
M-90	CL		< 5.0	< 5.0	10	< 5.0	33	< 5.0	< 5.0	< 100	< 5.0	< 5.0	< 10
W-90	DE		coc	coc	coc	coc	coc	coc	coc	coc	coc	coc	coc
M-90	LE		< 0.10	< 0.10	2.8	< 0.10	> 4.4	< 0.10	< 0.10	> 4.4	3.4	0.85	< 0.20
M-90	MA		< 0.25	< 0.25	< 0.25	4.5	< 0.50	1.8	< 0.25	< 5.0	< 0.25	< 0.25	< 0.50
M-90	PE		< 0.10	< 0.10	< 0.10	< 0.10	0.28	< 0.10	< 0.10	3	< 0.10	< 0.10	< 0.20
E-91	CL		< 100	< 100	< 100	< 100	< 250	< 100	< 100	< 200	< 100	< 100	< 200
		MAX	0	0	10	4.5	33	1.8	0	3	3.4	2.1	0
		MIN	0	0	2.8	4.5	0.28	1.8	0	3	1.3	0.85	0

Used Dry Cleaner Bottoms

Physical Properties and TCLP Metals Analysis, ppm

LAB	SITE	Parameter	pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
		Reg. Lmtl	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5
E-91	HE		6.3	1.05		< 1.4	1.6	0.19	17.4	4.9	< 0.011	< 0.28	< 0.14
S-92	HE				185	< 0.45	0.48	0.41	0.07	2.19	< 0.0008	< 0.55	< 0.10
S-92	NJ			1.1	> 200	< 0.45	0.08	< 0.05	0.09	< 0.35	< 0.0008	< 0.55	< 0.10
S-92	NY			1.19	> 200	< 1.80	1.12	0.03	8.72	< 1.40	< 0.04	< 0.14	< 0.03
E-93	NM					< 1.0	1.8	0.14	19.7	1.5	0.0038	< 0.20	< 0.10
SW-93	NJ-V		4.58	1	> 200	< 0.050	0.104	0.028	0.153	0.115	< 0.002	< 0.100	< 0.010
SW-93	GA-m		5.41	0.97	148	< 0.050	0.147	0.043	0.32	1.7	< 0.002	< 0.100	< 0.010
SW-93	GA-N		4.5	1.24	> 200	< 0.050	0.046	< 0.003	0.036	< 0.050	0.0035	< 0.100	< 0.010
SW-93	WV-N		5.83	1.08	> 200	< 0.050	0.042	0.011	0.061	0.065	< 0.002	< 0.100	< 0.010
SW-93	KS-E		8.58	1.28	> 200	< 0.050	0.068	0.013	0.062	0.255	< 0.002	< 0.100	< 0.010
SW-93	KS-W		6.79	0.8	118	< 0.050	0.097	0.009	0.058	0.079	< 0.002	< 0.100	< 0.010
SW-93	KS-W		4.19	1.05	> 200	< 0.050	0.092	0.01	0.91	0.268	< 0.002	< 0.100	< 0.010
SW-93	GA-C		5.14	1.02	150	< 0.050	0.28	0.058	0.589	0.411	< 0.002	< 0.100	< 0.010
SW-93	GA-G		6.24	1		< 0.050	0.066	0.009	0.119	< 0.050	< 0.002	< 0.100	< 0.010
SW-93	TN-N		6.24	1.21	> 200	< 0.050	0.195	0.055	0.115	0.077	< 0.002	< 0.100	< 0.010
SW-93	TN-K		5.2	1.1	> 200	< 0.050	0.083	0.007	< 0.005	< 0.050	< 0.002	< 0.100	< 0.010
SW-93	NJ-N		5.18	0.963	> 200	< 0.050	0.257	0.329	0.17	1.4	< 0.002	< 0.100	< 0.010
SK-93	NY-W		6.9	0.82	119	< 4.5	< 0.50	< 0.50	1.7	< 3.5	< 0.04	< 0.359	< 1.0
SK-93	NY-W		7.18	0.97	119	< 0.45	0.204	0.221	0.138	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-W		7.14	0.98	119	< 0.45	0.185	0.227	0.0855	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-D		6.18	0.81	108	< 4.5	2.06	< 0.50	3.43	< 3.5	< 0.04	< 0.36	< 1.0
SK-93	NY-D		6.04	0.83	108	< 4.5	2.45	< 0.50	3.85	< 3.5	< 0.04	< 0.36	< 1.0
SK-93	NY-D		6	0.82	107	< 4.5	2.21	< 0.50	3.84	3.71	< 0.04	< 0.36	< 1.0
SK-93	NY-D		6	0.82	109	< 4.5	2.21	< 0.50	3.77	3.6	< 0.04	< 0.36	< 1.0
SK-93	NY-W		5.11	1.13	> 200	< 0.45	0.18	< 0.50	0.262	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-W		4.78	1.19	> 200	< 0.45	0.379	< 0.050	0.58	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-W		4.86	1.14	> 200	< 0.45	1.603	< 0.050	1.479	0.512	< 0.0008	< 0.550	< 0.10
SK-93	NY-N		6.46	1.19	> 200	< 0.45	0.318	< 0.050	0.268	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-N		4.12	1.14	> 200	< 0.45	0.15	< 0.050	0.641	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-C		6.18	0.93	> 200	< 0.45	0.424	< 0.050	14.8	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-C		6.08	1.007	> 200	< 0.45	1.26	< 0.050	6.8	0.479	< 0.0008	< 0.550	< 0.10
SK-93	NY-D		5.06	1.07	> 200	< 0.45	0.608	< 0.050	29.68	< 0.35	< 0.002	< 0.550	< 0.10
SK-93	NY-D		5.88	1.07	> 200	< 0.45	0.86	0.058	0.431	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-D		5.78	1.08	> 200	< 0.45	2.767	< 0.050	0.255	< 0.35	< 0.0008	< 0.550	< 0.10
SK-93	NY-D		6.75	1.54	> 200	< 4.5	0.525	< 0.50	4.25	< 3.5	< 0.04	< 0.36	< 1.0
SW-93	IN		6.69	1.04	> 200	< 0.110	2.36	0.494	0.649	7.42	0.0039	< 0.200	< 0.015
SW-93	IN		3.61	1.13	> 200	< 0.220	< 0.080	0.0655	0.539	0.709	0.0144	< 0.400	< 0.030
SW-93	IN		6.89	1.13	> 200	< 0.110	< 0.040	0.0216	0.304	0.273	< 0.002	0.262	< 0.015
SW-93	IN		7.09	1.1	> 200	< 0.110	0.578	0.128	6.58	2.42	< 0.002	< 0.200	< 0.015
SK-93	NY-N		5.58	1.18	> 200	< 0.45	0.125	< 0.050	0.43	< 0.35	< 0.00080	< 0.550	< 0.10
SW-93	IN		6.23	0.79	112	< 0.050	0.134	0.11	0.052	7.03	0.004	< 0.100	< 0.003
SW-93	IN		6.23	0.85	112	< 0.050	0.0996	0.115	0.039	6.07	0.006	< 0.100	< 0.003
SW-93	IN		6.35	0.81	113	< 0.050	0.168	0.124	0.0692	8.7	0.002	< 0.100	< 0.003
		MAX	8.58	1.54	185	0	2.767	0.494	20.58	8.7	0.0144	0.262	0
		MIN	3.61	0.79	106		0.042	0.007	0.038	0.065	0.002	0.262	

Used Dry Cleaner Bottoms

TCLP Volatiles Analysis, ppm

LAB	SITE	Parameter Reg. Limit	benzene 0.5	CCI4 0.5	Cibenz 100	CHCl3 6	1,4-DCIB 7.5	1,2-DCA 0.5	1,1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChloride 0.2
E-91	HE		< 1000	< 84	< 1000	< 1000	< 1.0	< 2000	< 1000	< 1000	4800	< 1000	< 2000
S-92	HE		< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 500	290	< 10	< 14
S-92	NJ		< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.5	19.5	< 0.1	< 0.14
S-92	NY		< 0.1	< 0.1	< 0.1	0.18	< 0.1	< 0.1	< 0.1	< 0.5	18	3.2	< 0.14
E-93	NM		< 25000	< 25000	< 25000	< 25000	150	< 25000	< 25000	< 50000	880000	< 25000	< 50000
SW-93	NJ-V		< 5	< 5	< 5	< 5	< 0.500	< 5	< 5	< 10	160	< 5	< 10
SW-93	GA-m		< 2.5	< 2.5	< 2.5	< 2.5	< 18.5	< 2.5	< 2.5	< 5.0	68	< 2.5	< 5.0
SW-93	GA-N		< 25	< 25	< 25	< 25	< 1.0	< 25	< 25	< 50	4600	< 25	< 50
SW-93	WV-N		< 100	< 100	< 100	< 100	< 1.0	< 100	< 100	< 500	11000	< 100	< 500
SW-93	KS-E		< 5	< 5	< 5	< 5	< 1.0	< 5	< 5	< 10	160	< 5	< 10
SW-93	KS-W		< 0.025	< 0.025	< 0.025	< 0.025	< 10	< 0.025	< 0.025	0.1	< 0.025	< 0.025	< 0.050
SW-93	KS-W		< 125	< 125	< 125	< 125	< 20	< 125	< 125	< 500	4000	< 125	< 500
SW-93	GAC		< 5	< 5	< 5	< 5	< 39.6	< 5	< 5	< 10	190	8.2	< 10
SW-93	GAG		< 6.3	< 6.3	< 6.3	< 6.3	< 2.0	< 6.3	< 6.3	< 13	140	< 6.3	< 13
SW-93	TN-N		< 5	< 5	< 5	< 5	< 1.0	< 5	< 5	62	160	< 5	< 10
SW-93	TN-K		< 5	< 5	< 5	< 5	< 1.0	< 5	< 5	< 10	130	< 5	< 10
SW-93	NJ-N		< 5	< 5	< 5	< 5	< 1.0	< 5	< 5	< 10	44	< 5	< 10
SK-93	NY-W		< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 250	180	< 50	< 100
SK-93	NY-W		< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	1.5	0.91	< 0.100	< 0.140
SK-93	NY-W		< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	1.8	0.13	< 0.100	< 0.140
SK-93	NY-D		< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 250	1900	< 50	< 100
SK-93	NY-D		< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 250	2000	< 50	< 100
SK-93	NY-D		< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 250	1400	< 50	< 100
SK-93	NY-D		< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 250	1900	< 50	< 100
SK-93	NY-W		< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 500	2730	< 100	< 140
SK-93	NY-W		< 25	< 25	< 25	< 25	< 25	< 25	< 25	< 125	380	< 25	< 35
SK-93	NY-W		< 25	< 25	< 25	< 25	< 25	< 25	< 25	< 125	380	< 25	< 35
SK-93	NY-N		< 25	< 25	< 25	< 25	< 25	< 25	< 25	< 125	1240	< 25	< 35
SK-93	NY-N		< 125	< 125	< 125	< 125	< 125	< 125	< 125	< 626	880	< 125	< 175
SK-93	NY-C		< 25	< 25	< 25	< 25	< 25	< 25	< 25	< 125	711	< 25	< 35
SK-93	NY-C		< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 12.5	184	< 2.5	< 3.5
SK-93	NY-D		< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 50	74.3	< 10	< 14
SK-93	NY-D		< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 12.5	56.9	< 2.5	< 3.5
SK-93	NY-D		< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 12.5	81.2	< 2.5	< 3.5
SK-93	NY-D		< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 500	40000	1700	< 140
SW-93	IN		< 1200	< 1200	< 1200	330	< 500	< 1200	< 1200	3200	8000	< 1200	< 2500
SW-93	IN		< 5.0	< 5.0	< 5.0	< 5.0	< 500	< 5.0	< 5.0	< 10	170	< 5.0	< 10
SW-93	IN		< 25	< 25	< 25	< 25	< 0.400	< 25	< 25	< 50	480	< 25	< 50
SW-93	IN		< 25	< 25	< 25	7.5	< 0.400	< 25	< 25	< 50	760	< 25	< 50
SK-93	NY-N		< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 50	270	< 10	< 14
SW-93	IN		< 120	< 120	< 120	< 120	< 200	< 120	< 120	< 120	1600	< 120	< 120
SW-93	IN		< 120	< 120	< 120	< 120	< 200	< 120	< 120	< 120	1800	< 120	< 120
SW-93	IN		< 120	< 120	< 120	< 120	< 200	< 120	< 120	< 120	1700	< 120	< 120

MAX
MIN

0
0

0
0

0
0

330
0.18

150
150

0
0

0
0

3200
0.1

680000
0.13

1700
1.2

0
-

SITE CODES/ANNUAL RECHARACTERIZATION

CL - Clayton RC, NJ
BI - Bismark, ND Branch
BU - Buffalo, NY
CA# - California Analyses - 1992
CH - Chicago RC, IL
CO - Colorado Branches
DE - Denton RC, TX
DO - Dolton RC, IL
EL - Elgin RC, IL
FA - Fargo, ND Branch
GA-C - Columbus, Georgia Branch
GA-G - Garden City, Georgia Branch
GA-M - Macon, Georgia Branch
GA-m - Morrow, Georgia Branch
GA-N - Norcross, Georgia Branch
HE - Hebron RC, OH
IN - Indiana Branches
KS-D - Dodge City, KS Branch
KS-E - Edwardsville, KS Branch
KS-W - Wichita, KS Branch
LE - Lexington RC, SC
MA - Manati, PR
NJ - New Jersey Branches
NJ-N - Newark, NJ Branch
NJ-V - Vincentown, NJ Branch
NM - Farmington, NM
NY - New York Branches
NY-C - Colonie, NY Branch
NY-D - Dewitt, NY Branch
NY-N - N. Amityville, NY Branch
NY-W - Woodside, NY Branch
PE - Petrocon, Modena, PA
RE - Reedley RC, CA
RE-C - Reedley (CA Sources)
RE-W - Reedley (WA Sources)
TN-D - Dyersburg, TN Branch
TN-K - Knoxville, TN Branch
TN-N - Nashville, TN Branch
WL - Wolf Lake, IN
WV-N - Nitro, WV Branch
WV-W - Wheeling, WV Branch

ATTACHMENT B

SECURITY MEASURES

SECURITY MEASURES

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. Warning signs in English and Spanish are placed on all sides of the fence stating "Danger - Unauthorized Personnel Keep Out" which are visible from twenty-five feet. Similar signs in Navajo will be in place no later than December 31, 1991. In addition, outdoor lights are on sensing devices that activate at low light conditions.

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 outside the return and fill station. The pumps are not activated unless mineral spirits solvent 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.

ATTACHMENT C

INSPECTION PROCEDURES

INSPECTION PROCEDURES

The resource recovery branch (i.e., service center) manager or his designate is responsible for carrying out and documenting the facility inspection (Examples of these forms are in Attachment 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 ~~Environment, Health & Safety Manager (EHS Manager)~~~~regional environmental engineer~~ or ~~Regional Sales 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. Tank inspections--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. Drum storage areas--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 hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, they must be repaired immediately.

- d. Route vehicles--Each route vehicle must be inspected daily to insure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment must be on board: sorbants, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses. Any missing equipment must be replaced.
- e. Dumpsters--The wet dumpster (in the return and fill station) must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster. The dry (trash) dumpster must be inspected to insure that no liquids are being placed in it.
- f. Safety equipment--The fire extinguishers must be checked weekly to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed weekly and the first aid kit and sorbents must be inspected weekly for adequate content and accessibility. ~~A list of required emergency equipment is in Attachment E.~~
- g. Security--The operation of each outside light, gate and lock must be checked daily. In addition, the fence must be inspected for deterioration on a weekly basis.

ATTACHMENT D

PERSONNEL TRAINING

PERSONNEL TRAINING
 ABSTRACT

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems.

TIME OF TRAINING

Job Title	Prior to Starting Work	On The Job	Annually or when Regulations or Procedures Change
Resource Recovery Branch Manager	X	X	X
Branch Secretary	X	X	X
Branch Sales Manager	X	X	X
Sales Representative	X	X	X
Material Handler Warehouse Person	X	X	X

PERSONNEL TRAINING

D.1 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to his job assignment. All facility employees except for Branch Secretaries and Sales Managers must complete an introductory training program before starting their jobs, with annual review and update thereafter. Attachment D.1 contains information on service center personnel and trainers, job descriptions, training outlines and training record forms. ~~Attachment D.2 are personnel working for Safety-Kleen Environment, Health, and Safety Department.~~ All employees at the facility have had training that satisfies the requirements of Pt. V, § 264.16. All of these people provide input to Safety-Kleen training program and any of them may participate in the actual training. The ~~EHS Manager regional environmental engineer,~~ directly assists with the training new resource recovery branch managers. The resource recovery branch manager, in turn, trains his employees. An employee may not work in an unsupervised position until he or she has received proper training as outlined in Attachment D.2.

D.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

The Corporate Training and Environmental, Health and Safety Department are responsible for developing, implementing and presenting the training program to the resource recovery branch manager. Environmental compliance and training of facility employees is the responsibility of the resource recovery branch manager. The Corporate Training and Environmental Health and Safety Departments ensure that the Resource Recovery Branch ~~Manager~~ is trained and that he in turn trains facility personnel including annual and introductory training of sales managers, sales representatives, branch secretaries and ~~Material Handlers, warehouse personnel. Resumes describing education, training, and hazardous waste experience for Environmental Health and Safety personnel responsible for developing and presenting training programs to the branch manager are presented in Attachment D.2.~~ Job descriptions are contained in Attachment D.1.

D.2.1 Resource Recovery Branch Manager

The resource recovery branch manager is ultimately responsible for the operations at the service center. The sales representatives, secretary and ~~Material Handler warehouseman~~ report to the resource recovery branch manager and he, in turn, must provide the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the ~~Rresource Rrecovery Branch Mmanager~~ must:

- a. keep the service center clean and orderly;
- b. execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;
- c. know the potential hazards of the material and wastes handled on site;
- d. identify potential spill and fire sources and be able to execute the contingency plan;

- e. inform all employees of their environmental responsibilities;
- f. act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office; and
- g. maintain all environmental records (such as manifests, training records and spill reports) on file.

The Resource Recovery Branch Manager is trained (see section D.3.1) sufficiently that he is able to perform as a trainer himself, for his employees.

D.2.2 Environment, Health and Safety Department

Safety-Kleen's Environment, Health and Safety (EHS) Department operates out of the corporate office in Elgin, Illinois, with EHS Managers located in key locations across the country. ~~Each regional environmental engineer who works in this department is responsible for compliance of the service centers in a given geographic area of the country.~~ The EHS Department must:

- a. provide a training program which addresses the requirements of environmental regulations and corporate policy;
- b. notify the proper authorities, oversee remedial actions and submit a written report to the state after an emergency situation has occurred;
- c. assure that environmental permits are submitted and updated as required; and
- d. manage any environmental compliance issues which exceed the resources available at the service center level.
- e. participate in training new resource recovery branch managers. ~~Resumes for these employees responsible for training new branch managers are in Attachment D.2.~~

D.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training is accomplished using both classroom and on-the-job methods. Environmental training for branch managers comes from both the EHS Department and ~~EHS Managers regional environmental engineers.~~ This training is sufficient enough to allow the resource recovery branch manager to in turn train his facility employees.

All facility employees are trained prior to starting or as soon as he or she begins working (depending on his or her position) and annually thereafter. An example of Introductory and annual training program outlines for all facility personnel are provided in Attachment D.2. In addition, new Resource Recovery Branch Managers receive more intense training as

designated by the Corporate Training and EHS Department. ~~These training program outlines are located in Attachment D.2.~~

D.3.1 Training of New Resource Recovery Branch Managers

New managers are trained for several weeks before they begin their new positions. This training is both in situ and classroom modes. While being trained at a designated "training facility", a new manager reviews all environmental records and learns the record keeping requirements. These records include: Waste Analysis Profiles manifests, personnel records, training records, facility inspection records, and spill reports. An employee may not work in an unsupervised position until he or she has received the training ~~as per the example~~ outlined in Attachment D.2.

The training culminates in about four weeks of training at his new facility, at least one day of which is devoted to environmental training with his ~~EHS Manager regional environmental engineer~~. This training consists of an introduction to environmental law and a review of the Part A and Part B, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. ~~This An Example of the training~~ is outlined in Attachment D.2.

Additional time is spent reviewing past environmental compliance at the branch manager's facility and regulations unique to his state are discussed as well.

D.3.2 Training of New Branch Secretaries

Branch secretaries are trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the branch manager and is done within six months of starting. It includes the items listed in the ~~Example~~ Introductory and Annual Training Topics for Branch Employees (Attachment D.2) which are explained in company-produced videotape presentations on emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues. In addition, the contingency plan must be reviewed with the branch manager within the first two weeks of the secretary starting work.

D.3.3 Training of Sales Manager

A branch sales manager is a middle management position created to supervise the sales force within a specific line of services. The sales manager position will be particular to a specific line of Safety-Kleen business and will be filled according to the needs of the facility. The primary goal of this position is to direct and assist the resource recovery branch manager in attaining sales goals in a specific line of business which Safety-Kleen offers. The sales manager supervises the sales aspect of the sales representative position. Though most training for this position is within the area of sales the sales manager also receives the training in the ~~Example~~ Introductory and Annual Training Topics for Facility Employees located in Attachment D.2. A sales manager may also be trained as the designate for performing facility inspection. Additional training in the form of slide/tape and /or video presentations and a review of the Contingency

Plan with the Resource Recovery Branch Manager is required. A job description for this position can be found in Attachment D.1.

D.3.4 Training of New Sales Representatives

New sales representatives are trained in situ for two weeks during which they are introduced to manifests, facility inspection records and training records. A sales representative may also be trained as the designate for performing the facility inspection. Additional training is in the form of videotape presentations and a review of the contingency plan. The contingency plan must be reviewed with the branch manager before the sales representative formally begins his new position and annually thereafter. All items listed in the Example Introductory and Annual Topics Training for Branch Employees (Attachment D.2) must be explained within six months of starting.

D.3.5 Training of New Material Handlers/Warehousemen

A warehouseman-Material Handler is trained to maintain the service center and assist the other branch employees in their tasks. He may be a designate for the facility inspection and must be trained by the branch manager as such. Within two weeks of the Material Handler's warehouseman's starting, the branch manager must review the contingency plan with him, and within six months he must review the items listed in the Example Introductory and Annual Training Topics for Branch Employees (Attachment D.2).

D.3.6 Annual Training

On an annual basis, employees are trained using a program prepared and updated annually by the EHS Department. The EHS Manager-regional environmental engineer must insure that the program has been executed. The annual training includes updates on environmental regulations, an in-depth review of the contingency plan and a review of RCRA inspection criteria.

All service center employees must annually review the items listed in the Introductory and Annual Topics for Branch Employees. This review is in the form of slide/tape and/or videotapes and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental regulations are issued by the EHS Department and must be read and discussed by all branch personnel.

D.4 TRAINING RECORDS

All training must be documented using the record forms in Attachment D.2. All training is documented. The records must be kept on file at the facility until closure. Employees may not work in unsupervised positions until the contingency plan has been reviewed and they understand emergency response procedures.

Attachment D.1

Example Employee Job Descriptions

REGIONAL MANAGER

JOB DESCRIPTION

The Regional Manager has overall responsibility for the branch operations within a certain geographic area defined by the Corporate Marketing Department. He is responsible for the proper operations and profitability of several (six to eight) service centers in his region.

REPORTS TO:

Divisional Vice President of Sales

QUALIFICATION:

Minimum high school graduate with Safety-Kleen management experience.

PRINCIPAL RESPONSIBILITIES:

1. Plan, direct, and monitor activities of resource recovery branch managers.
2. Training of resource recovery branch managers and branch secretaries.
3. Assist resource recovery branch managers with their administrative and sales activities, when necessary.
4. Monitor sales and inventory figures and report them to the corporate offices.
5. Insure that the facility and equipment are inspected regularly, and necessary repairs or remedial actions are implemented.
6. Represent Safety-Kleen Corp. in local community affairs and public relation activities.
7. Coordinate with corporate Technical Services and Environmental Engineering Departments and implement necessary actions or plans for regulatory compliance.

RESOURCE RECOVERY BRANCH MANAGER

JOB DESCRIPTION

The Resource Recovery Branch Manager has overall responsibility for the facility operations and maintenance, and directs sales activities within a certain geographic area defined by the Corporate Marketing Department. He is responsible for the proper operations and profitability of the service center.

REPORTS TO:

Regional Manager of Sales

QUALIFICATION:

Minimum high school graduate with Safety-Kleen sales experience.

PRINCIPAL RESPONSIBILITIES:

1. Plan, direct, and monitor activities of Sales Representatives.
2. Training of sales representatives and other branch personnel.
3. Assist or accompany sales representatives during their sales activities, when necessary.
4. Tabulate daily sales and inventory figures and report them to the corporate offices.
5. Maintain adequate inventory of solvents, allied products, and equipment.
6. Carry out corporate policies and standards regarding facilities, equipment operation and maintenance.
7. Inspect facility and equipment regularly, and implement necessary repairs or initiate remedial actions.
8. Represent Safety-Kleen Corp. in local community affairs and public relation activities.
9. Coordinate with corporate Technical Services and Environmental Engineering Departments and implement necessary actions or plans for regulatory compliance.

Primary

- Files Preprints, Manifests and other sales or hazardous waste documents.
- Accurately transfers waste information form documents to Facility Operations Log.
- Sorts mail.
- Maintains customer files.
- Prepares correspondences with customer and corporate office.
- Processes previous day's work for automotive line of business.
- Makes 20 week entries from sales documents.

Secondary

- Selects supplies to be purchased and submits for approval (if designated).
- Keeps assigned work area neat and tidy.
- Tabulates and delivers bank deposit.
- Completes special projects for BFM and/or RRBM.
- Answers phone.
- Makes collection calls according to procedures or requests.
- Runs bank and post office errands.
- Assists other secretaries.

Policy Date Draft
Prepared by J. Pelletier
C. Sprague
Approved by _____

Safety-Kleen Corp.®

Branch Secretary Position Description

Position Title:

BRANCH SECRETARY, LEVEL 1

Division:

FACILITY MANAGEMENT

Organizational Relationship:

Branches With BFM: Reports directly to the BFM.

Branches Without BFM: Reports directly to the RRBM.

Qualifications:

Minimum of a High School diploma or equivalent.

Some Computer Training preferred

Position Overview:

This position involves limited independent judgement. May be a part time or temporary position. This position is entry level. This position follows the guidance of a Junior or Senior Branch Secretary and follows a procedural manual developed by the Junior or Senior Branch Secretary.

This position requires good matching ability, good typing, and filing skills. Possible data entry or computer skills are necessary in some branches. This position entails document editing and correcting sales and hazardous waste documents according to set standards.

- ⇒ Helping maintain service center cleanliness and operating efficiency when called upon to do so.
- ⇒ Preventing unnecessary damage or waste of supplies or equipment.
- ⇒ Performing special duties as assigned by supervisors within the limits of corporate policy.

Typical Daily Duties:

1. Perform safety check each day on assigned route truck and replenish products on the truck before beginning daily activity.
2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
3. Exchange used solvents with fresh solvent and replenish the inventory of Safety-Kleen's products for existing customers.
4. Make minor repairs on Safety-Kleen's parts washer equipment at customer locations (fusible link, light assy, lid, pump, etc.) or replace with new equipment.
5. Accurately prepare the necessary paper work for each service (including all government related documents, labels, or vehicle placards), and bill or credit the customer, as necessary.
6. At the end of each day, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the supervisor or clerical staff can tabulate the daily figures and forward them to the Corporate office. Offloading of solvents and machines, although in some cases this is performed by a warehouseman, is the responsibility of the sales rep. This offloading includes the proper placement in specified areas of the warehouse or drum storage areas.

service include ensuring only approved waste is removed, and that all applicable labels and documentation are accurate, while maintaining the highest possible service standards.

The rep has other Safety-Kleen or customer owned parts cleaning equipment to service meeting similar requirements. A line of cleaning products is also available and should be demonstrated and sold at each customer location. The Sales Rep is expected to be knowledgeable, and in compliance at all times with, Corporate and governmental regulations regarding the proper shipment, handling, and emergency response procedures for hazardous materials and wastes.

Responsibilities:

The Sales Rep will operate within the limits of a signed employment agreement and other established Corporate policies and procedures. Responsibilities include maintaining a working knowledge of these policies and procedures. The responsibilities are as follows:

- ☞ Maintaining Safety-Kleen's high quality of sales and service to all customers by complying with the ethical and environmental policies of the Corporation.
- ☞ Monitoring assigned customer account balances and actively engaging in the collection of past due monies.
- ☞ Daily, preparing and submitting, of accurate and proper service forms, daily control sheets and corresponding monies.
- ☞ Maintaining the cleanliness of and safeguarding all equipment in, vehicles, parts washers, and other assigned property.
- ☞ Responding in a timely manner to customer complaints to the satisfaction of the customer within applicable constraints of Corporate policy.
- ☞ Developing and maintaining good customer relations with each assigned account.
- ☞ Accurately preparing and on-time submitting of regular and special reports.
- ☞ Representing a professional image by wearing the appropriate uniform and safety equipment while performing Company duties. Every attempt should be made to maintain a clean uniform throughout the day.
- ☞ Introducing new Safety-Kleen products and replenishing same to Safety-Kleen customers.

Policy Date Draft

Prepared by J. Pelletier

Approved by _____

Safety-Kleen Corp.®

Field Sales and Service Position Description

Position Title:

INDUSTRIAL SALES AND SERVICE REPRESENTATIVE

Division:

INDUSTRIAL SERVICES

Organizational Relationship:

Reports directly to the Branch Industrial Manager and indirectly to the Resource Recovery Branch Manager or other management levels as indicated by attached Corporate organizational chart.

Qualifications:

High school graduate (minimum).

: Able to pass D.O.T. Certification and meet other hiring requirements.

Possess, or be able to possess, a valid commercial driver's license.

Position Overview:

The Safety-Kleen Sales and Service Representative is responsible for specific sales and service activities within an assigned geographic area. This includes servicing established accounts and generating new accounts or leads for the BIM. Duties include travel by truck to customer locations, demonstrating and servicing parts cleaning equipment or engaging in drum removal services which may involve drums weighing up to 800 lbs. Servicing equipment includes transferring barrels weighing 75 to 140 pounds to and from the truck to the customer's location, cleaning and lifting a 50-72 pound sink from the drum at this location and placing it on the clean barrel, and checking to ensure proper working order of the sink (replacing parts if necessary). Some equipment requires slightly different cleaning procedures. The drum of used solvent is then returned to the truck and branch accompanied by the properly completed paperwork. Both the above machine service and drum removal

Policy Date Draft
Prepared by J. Pelletier
C. Sprague
Approved by

Safety-Kleen Corp.®

Field Material Handler Position Description

Position Title:

MATERIAL HANDLER

Division:

FACILITY MANAGEMENT

Organizational Relationship:

Branches With BFM's: Reports directly to the BFM.

Branches Without BFM's: Reports directly to the RRBM.

Qualifications:

Minimum of a High School diploma or equivalent.

Able to pass D.O.T. certification and meet other hiring requirements.

Possess or be able to possess a valid Commercial Driver's Licence (CDL).

Position Overview:

The Material Handler receives inventory and used solvent into facility. The Material Handler empties drums into a hazardous waste storage tank, washes drums and fills the drums with clean solvent. The Material Handler unloads drums that are flammable and or corrosive and stores those wastes for pick-up. The Material Handler palletizes wastes and readies them for shipment. The Material Handler double checks Sales Representatives truck to ensure they are properly strapped.

The Material Handler also keeps the warehouse clean and free of debris. The Material Handler accounts for and cleans any stains within the facility.

Essential Job Functions and Responsibilities

- o Markets and sells the total Automotive Fluid Recovery Service/WE CARE service.
- o Signs automotive accounts to the Safety-Kleen Service Contract and Oil agreements where applicable.
- o Ensures that customers have the right kind of equipment which is properly labeled on the appropriate service interval, and priced properly. Ensures the retention and satisfaction of existing customers.
- o Understands and adheres to all environmental laws and regulations, the Corporate Ethics Policy, and all other Corporate policies and procedures.
- o Reviews weekly and period sales production summaries.
- o Manage all personnel within the assigned territories by daily/weekly communication in regards to branch standards, goals and objectives.
- o Assures training of new personnel by following the New Rep Action Plan.
- o Conducts performance reviews with assigned personnel.

BRANCH MIDDLE MANAGEMENT POSITION DESCRIPTION

Position Title:

BRANCH AUTOMOTIVE MANAGER

Organizational Relationship:

Reports directly to the Resource Recovery Branch Manager. All Automotive and Oil Sales Representatives within assigned territories report directly to the BAM.

Qualifications:

High School graduate (minimum) who has demonstrated above average Safety-Kleen sales ability and performance. Applicant should exhibit leadership abilities and be self-motivated, and pass Company testing. Excellent communication and presentation skills are mandatory.

Primary Focus:

- o Assures customer satisfaction and achieves assigned sales goals as related to automotive services in assigned territory. This task is accomplished in part by significant personal direct sales effort.

Secondary Focus:

- o Assists with the final selection of automotive sales representatives and ensures their proper training. Trains, motivates and manages the automotive sales staff within the assigned territory preparing them for future career opportunities.

Attachment D.2

Example Training Plan Outline

EXAMPLE TRAINING PLAN OUTLINE

ANNUAL ENVIRONMENTAL COMPLIANCE COURSE FOR REGIONAL MANAGERS,
RESOURCE RECOVERY BRANCH MANAGERS AND SECRETARIES

- I. Opening Remarks
- II. Environmental Laws - National
 - A. Introduction
 - B. The National Environmental Policy Act (NEPA)
 - 1. Purpose
 - 2. Procedure: The Environmental Impact Statement
 - C. The Clean Air Act (CAA)
 - 1. Purpose
 - 2. How the Act Works
 - D. The Clean Water Act (CWA)
 - 1. Purpose
 - 2. Effluent Limitations for Direct Discharges
 - 3. Pretreatment Standards for Indirect Discharges to Publicly Owned Treatment Works (POTW)
 - 4. Permit Program
 - E. The Resource, Conservation and Recovery Act (RCRA)
 - 1. Purpose

- F. The Toxic Substances Control Act (TSCA)
 - 1. Purpose
 - 2. How TSCA Works
 - G. The Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA" or "Superfund")
 - 1. Purpose
 - 2. Superfund clean-up
- III. Resource, Conservation and Recovery Act (RCRA)
- A. Overview and Scope
 - B. Hazardous Waste Management
 - 1. Implementation
 - 2. Identification and Listing of Hazardous Waste
 - a. Listed Wastes
 - b. Characteristic Wastes
 - c. Waste Mixtures
 - 3. Generator Regulation
 - a. General requirements
 - b. Generator categories: 100-1000 kg./mo. generators
 - 4. Transporter Regulation
 - a. General requirements
 - b. Discharges of hazardous waste during transportation

5. Treatment, Storage or Disposal Facility Regulation

- a. General requirements
- b. Interim status facilities
- c. Permitted facilities

6. Enforcement

- a. Inspections
- b. Compliance Orders
- c. Criminal Violations
- d. Knowing Endangerment
- e. Enforcement activity

C. New RCRA Programs

1. Leaking Underground Storage Tanks

- a. The requirements
- b. New Tank Ban
- c. Notifications

IV. Facility Operation: Interim Status

- A. Part A Application
- B. Waste Analysis Plan
- C. Preparedness and Prevention Plan
- D. Contingency Plan and Emergency Procedure
- E. Training
- F. Closure

- G. Inspections
- H. Transportation Licensing
- V. Manifesting
 - A. Overview
 - B. Manifesting: Branch-Specific Instruction
- VI. Certification Examination
- VII. Sales Application of Environmental Compliance
- VIII. Adjourn

EXAMPLE TRAINING PLAN OUTLINE

FOR

BRANCH EMPLOYEES

- I. Purpose of Training and a Review of the Training Plan Outline
- II. Environmental Regulations and Customer Responsibilities
 - A. Small Quantity Generator vs. Generator
 - B. Manifesting - How to Complete and Distribute a Manifest
 - C. EPA Identification Numbers
- III. Transportation Regulations
 - A. Permits
 - B. Vehicle Inspections and Records
- IV. Waste Analysis Plan - Analyzing Incoming Shipments
- V. Preparedness and Prevention Plan
 - A. Performing and Recording a Facility Inspection
 - B. Proper Maintenance of Storage Facilities and Associated Equipment
 - C. Emergency Equipment - Availability and Use
- VI. Contingency Plan
 - A. Implementation of the Contingency Plan - Personnel and Emergency Functions
 - 1. Spills and Fires and Proper Response Actions
 - a. On Site Accidents
 - b. Transportation Accidents
 - 2. Reporting Requirements
 - a. Safety-Kleen Corp.
 - b. State Emergency Response System
 - c. National Response Center

- B. Emergency Information
- C. Corporate Policies 600-608, 609 and 610
 - 1. Review of Material Safety Data Sheets
- D. Recordkeeping - Spill Report Telephone Log

PERMIT ATTACHMENT E

FACILITY DESCRIPTION, WASTE HANDLING,
PREPAREDNESS AND PREVENTION PROCEDURES

PREPAREDNESS AND PREVENTION PLAN
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 sensing devices and automatically comes on at low light hours of the day

INSPECTION PROCEDURES: See Attachment C for a sample 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.

E.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 several services, 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.

E.1.a. 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 ~~sink affixed to a drum which meets Department of Transportation (DOT) requirements (typically a 16 or 30 gallon drum) container meeting DOT specifications and contains Safety-Kleen 105 sSolvent (Parts Washer Solvent).~~ 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 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.

Spent material is poured into the dumpster/drum washer in the return and fill station. It is then pumped into the storage tank for spent solvent. The sediment which accumulates in the bottom of the dumpster/drum washer is removed manually, drummed and stored in the return and fill station according to the satellite accumulation requirements of 40 CFR 262.34(b). ~~Drums will be filled with sediment to no more than 2 inches from the top of the drum.~~ The drummed sediment is manifested off-site prior to the expiration of the 90-day time frame for accumulation of hazardous waste.

~~Spent aqueous parts cleaning solvents are either bulked at the service center or are poured into the dumpster/drum washer in the return and fill station.~~

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 ~~which meets DOT~~

~~requirements (typically a 16 or thirty gallon container) meeting DOT specifications~~ 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 hand a pump~~. The same analyses are performed on waste solvent from customer-owned 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 ~~meeting DOT specifications, which meets DOT requirements (typically a 16 gallon drum) 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.~~

E.1.b. Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are drummed on the customer's premises and are periodically collected by a sales representative. The drummed waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. About 35% of this waste is returned to dry cleaners as usable product.

E.2 DESCRIPTION OF THE FACILITY

The Farmington service center has been operating as a storage facility since January 1, 1981. The facility consists of the following structures:

- a. ~~3,060~~ 1,530 square foot warehouse with offices and a contained area for drum storage;
- b. two 12,000 gallon above-ground storage tanks, with diking, for clean and spent solvent; and
- c. a solvent return and fill station with a loading dock.

Descriptions of the surrounding area and of waste management practices at the service center follow. Applicable maps and facility drawings are ~~at the end of~~ Attachment E.

E.2.1 Regional Description

The Farmington Service Center is located 600 feet northeast of the intersection of Troy King Road and West Main Street (U.S. Hwy ~~64550~~) in San Juan County. This area is zoned industrial and to the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may conflict with operations at this site.

The western part of San Juan County is the Navajo Indian reservation. Eastern San Juan County, the location of Farmington, has a total area of 2,182,520 acres or 3,410 square miles. The total population of the area is approximately 50,000 with about 34,000 in Farmington. The major industries in Farmington are involved in the development of gas, oil and coal resources. Abundant rangeland contributed to the growth of the area through cattle raising and farming, however, this industry has largely declined.

Farmington has a continental climate with an average annual precipitation of 6 inches and total annual snowfall of 9 inches. The average temperature in winter is 44° F and the average summer temperature is 71° F. The average daily temperature range is 33 degrees. An average of 40 thunderstorms occur each year and prevailing winds are east-west.

San Juan County is in the San Juan Basin part of the Navajo section of the Colorado Plateau physiographic province. This area is a structural depression containing deep Tertiary till on rocks of late Cretaceous age. Farmington is located in the alluvial fan in the entrenched San Juan and Animas Rivers. The service center is not in the flood plain of either river. The elevation at the site is 5,470 feet above sea level. The San Juan River provides the principal drainage route for the area and the Animas River is its main tributary.

The soil in the area of the service center is the Avalon sandy loam. This is a deep well-drained soil on mesas and plateaus which formed in alluvial and eolian material derived from sandstone and shale. This soil is moderately permeable with slopes ranging from 5 to 8 percent.

The city of Farmington obtains its water primarily from the Animas River through two pump stations. Pump station 1 is located about two miles east of Farmington and pump station 2 and the Bee Line reservoir are several miles northeast of Farmington. Standby water is obtained from a pump station several miles south of Farmington on the San Juan River. The service center obtains water from the city of Farmington via a 6" water line on Hawkins Road. A drop inlet to the city storm sewer system is located approximately 500 feet west of the service center. Sewage is collected in a septic tank.

There are no known oil or gas wells within a mile of the service center. No parks, schools, wetlands or critical habitats exist within one mile of the service center.

The non-building areas of the facility are paved with asphalt, concrete or gravel, as noted on the Site Plan at the end of Attachment E. The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station and this area is paved with asphalt and concrete. The entrance to the facility is on Hawkins Road which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The route van that daily travels the routes between the service center and its customers uses the two-lane approach driveway. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area.

E.3 FACILITY DESIGN

The Farmington service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents which may occur. Specifications for the storage facilities, secondary containment and other equipment are ~~at the end of~~ Attachment E and descriptions follow.

E.3.1 Tank Storage

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 with steel reinforced cement. The secondary containment measures ~~approximately~~ 37 feet by 22 feet by 3 feet and holds 18,266 gallons. The slab is six and the wall is eight inches thick. Two 12,000 gallon tanks are located within the containment; one for spent solvent and one for new solvent.

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 with a metal roof and the secondary containment is monolithically poured concrete. The ~~dumpster/drum washer is~~ are tight-piped to the tank, and all piping is aboveground and the joints are welded.

E.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, or equivalent, 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 solvent~~ is sometimes used as a rust-preventive coating for steel. Dry cleaning wastes are stored in polyethylene and steel drums, ~~both of which meet DOT requirements~~ both containers meeting DOT specifications. 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.

Compatibility of Containers with their contents and each other: The ~~mineral spirits solvent~~ immersion cleaner, dry cleaning waste and paint wastes are compatible with the drums in which they are stored; in fact, ~~mineral spirits solvent~~ is sometimes used as a rust-preventative coating for steel. Immersion cleaner, ~~solvent~~ ~~mineral spirits~~, and paint waste are stored in steel drums.

Dry cleaning wastes are stored in containers ~~which meet DMT requirements~~ meeting DOT specifications. The typically used polyethylene drums have been treated with fluorine gas to be resistant to dry cleaning solvents. Immersion cleaner and dry cleaner waste are never opened at the branch facility. Containers in the warehouse will be palletized to facilitate storage shipping. Since none of the wastes handled by Safety-Kleen react with steel or polyethylene, compatibility is assured.

E.4 In accordance with 40 CFR 264.73, Safety-Kleen maintains a manifest system, an operating record, biennial reports and all other records required under these sections.

E.4.1 Waste Management Practices

The Farmington service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The aboveground storage tanks, drum storage areas and return and fill station all have secondary containment and the service center has the equipment necessary for employees to safely manage wastes on-site. ~~At the end of Attachment E there are contains~~ drawings of the waste management facilities.

~~Spent mineral spirits solvent~~ from parts washers is accumulated in a 12,000 gallon aboveground storage tank via the return and fill station. ~~Spent material (typically in 5, 16, and 30 gal. containers which meet DOT requirements~~ in containers meeting DOT specifications is poured into the dumpsters in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The sediment which accumulates in the bottom of the ~~dumpster/drum~~ ~~dumpster~~ washer is removed manually, drummed and stored in the return and fill station according to the satellite accumulation requirements of 40 CFR § 262.34(b). ~~Drums will be filled with sediment to no more than 2 inches from the top of the drum.~~ The drummed sediment is manifested off-site prior to the expiration of the 90 day time frame for accumulation of hazardous waste. The return and fill station has secondary containment in the form of a ~~17'6" x 11'2" x 0.5'~~ ~~16.5' x 10.5' x 0.5'~~ (730648 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 approximately 37' x 22' x 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 solvent~~. 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. The wastes are not mixed while on site and different wastes are segregated according their contents. 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 an approximately ~~11.7' x 1.7' x 2.5'~~ ~~12' x 2' x 2.5'~~ (448.8 (382 gallons) collection trench. No more than ~~4,464~~ ~~3,820~~ gallons of spent solvents will be stored in the drum storage area at any time.

All containers used for storage of hazardous waste will meet DOT specifications requirements and will have a maximum capacity of 55 gallons (except for 85 gallon overpack drums). Example specifications for containers used at the service center are provided in Appendix E.

An example of the configuration for storage of containers is shown on the Floor Plan in Attachment E (Figure D13146). Two feet of aisle space Proper aisle spacing 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.

E.4.2 Safety-Kleen must implement the manifesting system required under 40 CFR 264.71. If the facility receives hazardous waste accompanied by a manifest, the resource recovery branch manager or his designate shall do all of the following:

- (a) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.
- (b) Note any significant discrepancies in the manifest on each copy of the manifest.
- (c) Within 30 days after the delivery, send a copy of the manifest to the generator.
- (d) Retain, at the facility, a copy of each manifest for not less than 3 years from the date of delivery. (Safety-Kleen is the TSDF as well as the transporter so only one copy is kept on file).
- (e) Return a copy of the manifest to the director or his or her designee within a period of 10 days after the end of the month in which the waste was received.

The requirements described above do not apply to hazardous waste produced by generators of more than 100 kilograms but less than 1,000 kilograms in a calendar month if both of the following requirements are met:

- (a) The waste is reclaimed under a contractual agreement pursuant to which the type and frequency of shipments are specified in the agreement and the vehicle used to transport the waste to the recycling facility and to deliver the regenerated material back to the generator is owned and operated by the reclaimer of the waste.
- (b) The generator maintains a copy of the reclamation agreement in his or her files for a period of not less than 3 years after termination or expiration of the agreement.

The facility will not receive bulk shipments of hazardous waste from a rail or water transporter.

When a shipment of hazardous waste is initiated from this facility, the Resource Recovery Branch Manager or his designate must:

- (a) Prepare a manifest before transporting the waste off-site.
- (b) Designate on the manifest one facility which is licensed to handle the waste described on the manifest. The resource recovery branch manager may also designate on the manifest one alternate facility which is licensed to handle his or her waste if an emergency prevents delivery of the waste to the primary designated facility.
- (c) Use a transporter who is properly licensed under the act or a generator- owned vehicle licensed under the act to transport the waste.
- (d) If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

Except as described in the next paragraph, the Resource Recovery Branch Manager shall use a manifest form approved by the director which contains all of the following information:

- (a) A manifest document number.
- (b) The generator's name, mailing address, telephone number, and EPA identification number.
- (c) The name and EPA identification number of each transporter.
- (d) The name, address, and EPA identification number of the designated facility and an alternate facility, if any.
- (e) The description of the waste required by regulations of the DOT in the provisions of 49 CFR 172.101, 172.202, and 172.203.
- (f) The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.
- (g) The hazardous waste number describing the waste.
- (h) The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations."

- (i) Other certification statements required by the director based on requirements under the Solid Waste Disposal Act.

If the Resource Recovery Branch Manager manifests a shipment of hazardous waste out of state, and if the state to which the shipment is manifested requires the use of another manifest, then the generator shall use that manifest.

The Resource Recovery Branch Manager shall do all of the following when initiating a shipment:

- (a) Sign the manifest certification by hand.
- (b) Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest.
- (c) Retain one copy for his files.
- (d) Submit one copy to the director or his or her designee, which shall be postmarked not later than 10 days after the month in which shipment was made.
- (e) Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the resource recovery branch manager or his designate must review the manifest and check the information on the manifest for correctness. It should be noted that Safety-Kleen computer-prints most of the required information on the majority of its manifests. The employee checking the manifest must review the names, addresses, EPA and New Mexico I.D. and transporter numbers, the manifest document number and the telephone numbers listed. In addition, the hazardous material (HM) box should be checked, the waste description, DOT classification, DOT I.D. number and EPA Waste Code must be verified. The number of drums and pounds, as well as the symbols for these units must be correct and an "H" must be entered in the last column. The generator, transporter(s) and TSD operator must all print and sign their names and enter the date the waste was shipped or received, as appropriate.

Upon discovering a significant manifest discrepancy, the Resource Recovery Branch Manager shall attempt to reconcile the discrepancy with the waste generator or transporter through telephone conversations or otherwise. If the discrepancy is not resolved within 15 days after receiving the waste, the Resource Recovery Branch Manager shall immediately submit, to the director and regional administrator, a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. Significant manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives, as follows:

- (a) For bulk waste, significant discrepancies are variations of more than 10% in weight
- (b) For batch waste, a significant discrepancy is any variation in piece count, such as a discrepancy of one drum in a truckload.
- (c) Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

E.4.3 The operating record must include:

- a. a record of hazardous waste shipments rejected by the facility including the following:
 - (1) the name of the generator and transporter,
 - (2) the manifest number,
 - (3) the date the shipment was rejected, and
 - (4) the reason for rejection;
- b. personal training records for all current personnel; and
- c. The contents of the waste storage tank, the quantity of each waste received, and the date each period of accumulation begins (i.e., the date each waste solvent pickup occurs) must also be included in the operating record.

E.4.4 A biennial report must be submitted by March 1 of each even numbered year. The biennial report shall be submitted on form 8700-13B. The report shall cover facility activities during the previous calendar year and shall include all of the following information:

- a. The EPA identification number, name, and address of the facility.
- b. The calendar year covered by the report.
- c. For off-site facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year, and, for imported shipments, the name and address of the foreign generator.
- d. A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities, this information shall be listed by EPA identification number of each generator.
- e. The method of treatment, storage, or disposal for each hazardous waste.
- f. The most recent closure cost estimate under 40 CFR 264.142.
- g. The certification signed by the owner or operator of the facility or the owner or operator's authorized representative.

E.5 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 of product or waste will be moved using a handcart and pallets using a forklift or pallet jack. 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.

E.5.1 Potential Minor Spill Sources

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. Pouring of drummed solvent into the dumpster--As the contents of the drums are poured into the dumpster, ~~typically 5, 16, and 30-gallon containers~~ 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 shut-off 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. Moving of containers--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 maintained in an upright position and remain tightly covered while in storage or in transit.
- d. Delivery truck transfers--The cargo should be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary.

If a spill does occur, the amount of solvent in the containers is a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results will be removed manually, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

E.5.2 Potential Major Spill Source

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

- a. Overfilling of storage tanks--Both product and spent solvent tanks can be overfilled with a resulting discharge of solvent. A high level alarm and daily checks of tank volumes will prevent this type of incident.
- b. Leaking pipelines--The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

E.5.3 Potential Fire Sources

The following is a list of fire prevention and minimization measures:

- a. All wastes and products are kept away from ignitable sources--
Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., the office or locker room). The ~~mineral spirits solvent~~ handling area and the aboveground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.
- b. Ignitable wastes are handled so that they do not:
 1. become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The ~~mineral spirits solvent~~ waste is stored in a tank or in drums, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the drums kept at room temperature to minimize the potential for pressure build up.
 2. produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health--The vapor pressure of ~~mineral spirits solvent~~ is low (2 mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization will be minimal under normal working conditions.
 3. produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See 'a' above and 'c' below.
 4. damage the structural integrity of the Safety-Kleen facility--The ~~mineral spirits solvents~~ will not cause deterioration of the tank, drums or other structural components of the facility.

- c. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.
- d. "No Smoking" signs are posted in areas where solvents are handled or stored.
- e. Fire extinguishers must be checked once per ~~week~~ month and tested by the fire extinguisher company once per year.

E.6 Tank Evaluation and Repair Plan

The product and waste stored in the tanks at this facility are pure and spent ~~mineral spirits solvent~~ both of which is compatible with the carbon steel structure; in fact, ~~mineral spirits solvent~~ is often used as a light hydrocarbon coating to prevent rusting of metal parts.

If, during the daily inspection, corrosion is noted, it will be removed and the tank repaired. If corrosion is significant and localized, the tank will be immediately taken out of service and repaired, (e.g., a patch welded over the corroded area). Should the corrosion of the vessel be extensive or if the tank is found to be leaking, the vessel will be immediately taken out of service and replaced. In the case of a tank which leaks outside of the dike, the facility's contingency plan will be initiated to insure the removal of any contaminated soil. Any extensive repairs to the tank system will be assessed and certified by an independent engineer before the system is returned to use.

E.7 External Factors

The design of the installation is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside. Also, the drum storage areas are in buildings which are inaccessible to unauthorized personnel.

- a. Vandalism - Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.
- b. Strikes - A strike would not result in a solvent spill or fire.
- c. Power failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.
- d. Flooding - The site elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.
- e. Storms or Cold Weather - The solvent return and fill station is roofed to eliminate the possibility of rain or snow entering the dumpsters. No opportunity is foreseen to affect the facility with snow, cold weather or storm water.

E.8 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS

Because the facility is small, internal communication within the building and the solvent return/fill area is accomplished by voice. An alarm is located on the loading dock which alerts another employee in the warehouse that there may be a problem. Telephones will be used to report a spill or a fire and to summon assistance from local and state emergency response agencies. Resource recovery branch managers have emergency phone numbers of local and state emergency response teams posted by each phone located in the sales office. Included in these phone numbers is the 24-hour telephone number which can be used to contact the Environment, Health and Safety Department. Releases to the environment will be reported telephonically within 24 hours. As required by permit condition Module I, Section E.13 and Permit Attachment F, The Contingency Plan.

E.9 SECURITY MEASURES

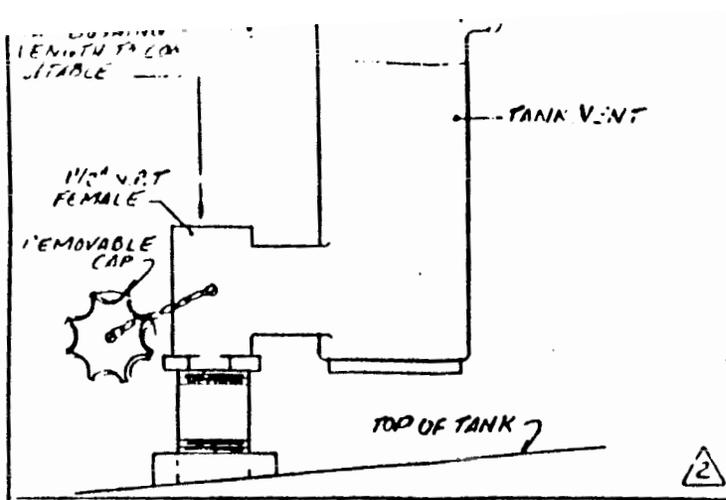
The facility is secured with a six-foot high chain link fence topped by three strands of barbed wire. All access gates are locked when the facility is unoccupied and warning signs in both English and Spanish and Navajo are placed fifty feet on all sides of the fence stating "Danger - Unauthorized Personnel Keep Out" which are visible from twenty-five feet are posted at the entrances. In addition, outdoor lights are on sensing devices that activate at low light.

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.

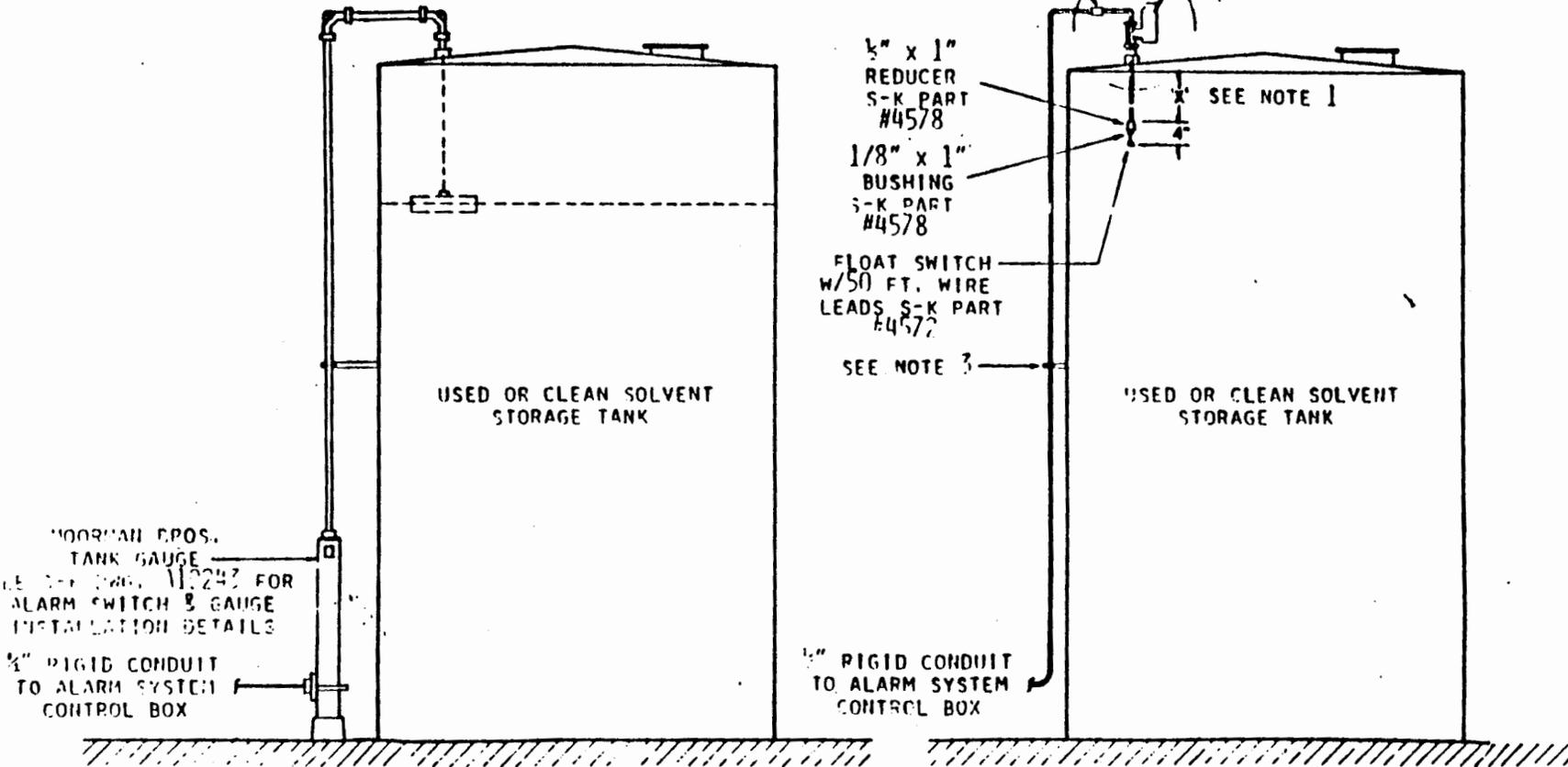
The tanks are inaccessible in that material can not be added to or removed from them without activating the pumps, the controls for which are outside of the return and fill dock. The pumps are not activated unless mineral spirits solvent product or waste is being added to or removed from the tanks by 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.

ABOVEGROUND TANK INSTALLATIONS

(HORIZONTAL OR VERTICAL)



5" RAIN-TIGHT COMPRESSION COUPLING



- OPTION 1 -

- OPTION 2 -

EXAMPLE — all laws.

INSPECTION LOG SHEET FOR:
 Daily Inspection of CONTAINER STORAGE AREA
 (A separate log must be completed for each storage area.)

DESCRIPTION OF AREA (e.g., metal shelter, northeast corner of warehouse, etc) _____

PERMITTED STORAGE VOLUME _____

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE (M/D/Y): _____

TIME _____

CONTAINERS

	MON.	TUES.	WED.	THURS.	FRI.
Total Volume of _____ ** waste:					
Total Volume of _____ ** waste:					
Total Volume of _____ ** waste:					
Total Volume of _____ ** waste:					
Total Volume of _____					
TOTAL VOLUME (IN GALLONS):					

A N A N A N A N A N

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted.

other: _____

Condition of Containers:

A N A N A N A N A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion.

other: _____

Stacking/Placement/Aisle Space:

A N A N A N A N A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets, other:

CONTAINMENT

Curbing, Floor and Sump(s):

A N A N A N A N A N

(Any material which spills, leaks or otherwise accumulates in the secondary containment must be completely removed within 24 hours of it being discovered.)

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant.

other: _____

Loading/Unloading Area:

A N A N A N A N A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* When calculating total volumes, assume the containers are full.

** Enter a short description of the waste (e.g., M.S., I.C., paint, etc.)

*** S = Acceptable N = Not Acceptable

INSPECTION LOG SHEET FOR:
Daily Inspection of STORAGE TANK SYSTEM

SPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

MON. TUES. WED. THURS. FRI.

TRANSFER PUMPS AND HOSES

Pump Seals: A N A N A N A N A N

If 'N', circle appropriate problem: leaks, other: _____

Motors: A N A N A N A N A N

If 'N', circle appropriate problem: overheating, other: _____

Fittings: A N A N A N A N A N

If 'N', circle appropriate problem: leaks, other: _____

Valves: A N A N A N A N A N

If 'N', circle appropriate problem: leaks, sticking, other: _____

Hose Connections and Fittings: A N A N A N A N A N

If 'N', circle appropriate problem: cracked, loose, leaks, other: _____

Body: A N A N A N A N A N

If 'N', circle appropriate problem: crushed, thin spots, leaks, other: _____

RETURN AND FILL STATION

Wet Dumpster: A N A N A N A N A N

If 'N', circle appropriate problem: sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, other: _____

Secondary Containment: A N A N A N A N A N

If 'N', circle appropriate problem: sediment/liquid, leaks, deterioration, distortion, excess debris, other: _____

Loading/Unloading Area: A N A N A N A N A N

If 'N', circle appropriate problem: cracks, ponding/wet spots, deterioration, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

A = Acceptable N = Not Acceptable

INSPECTION LOG SHEET FOR:
Daily Inspection of TANK EQUIPMENT

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE: (M/D/Y) _____

TIME _____

Pump, Flange, or Valve Number	MON.	TUES.	WED.	THURS.	FRI.
1 _____	A N	A N	A N	A N	A N
2 _____	A N	A N	A N	A N	A N
3 _____	A N	A N	A N	A N	A N
4 _____	A N	A N	A N	A N	A N
5 _____	A N	A N	A N	A N	A N
6 _____	A N	A N	A N	A N	A N
7 _____	A N	A N	A N	A N	A N
8 _____	A N	A N	A N	A N	A N
9 _____	A N	A N	A N	A N	A N
10 _____	A N	A N	A N	A N	A N
11 _____	A N	A N	A N	A N	A N
12 _____	A N	A N	A N	A N	A N
13 _____	A N	A N	A N	A N	A N
14 _____	A N	A N	A N	A N	A N
15 _____	A N	A N	A N	A N	A N
16 _____	A N	A N	A N	A N	A N
17 _____	A N	A N	A N	A N	A N
18 _____	A N	A N	A N	A N	A N
19 _____	A N	A N	A N	A N	A N
20 _____	A N	A N	A N	A N	A N
21 _____	A N	A N	A N	A N	A N
22 _____	A N	A N	A N	A N	A N
23 _____	A N	A N	A N	A N	A N
24 _____	A N	A N	A N	A N	A N
25 _____	A N	A N	A N	A N	A N
26 _____	A N	A N	A N	A N	A N
27 _____	A N	A N	A N	A N	A N
28 _____	A N	A N	A N	A N	A N
29 _____	A N	A N	A N	A N	A N
30 _____	A N	A N	A N	A N	A N
31 _____	A N	A N	A N	A N	A N
32 _____	A N	A N	A N	A N	A N
33 _____	A N	A N	A N	A N	A N
34 _____	A N	A N	A N	A N	A N
35 _____	A N	A N	A N	A N	A N
36 _____	A N	A N	A N	A N	A N
37 _____	A N	A N	A N	A N	A N
38 _____	A N	A N	A N	A N	A N
39 _____	A N	A N	A N	A N	A N
40 _____	A N	A N	A N	A N	A N

N enter pump or valve # _____ and circle appropriate problem: potential leak, active leak, sticking, wear, does not operate properly, other: _____

For all leaks and potential leaks, the Leak Detection and Repair Record must be completed.

*Add short descriptions of unit being inspected (e.g. gate valve, dumpster flange, dumpster pump, etc.)

**A = Acceptable N = Not Acceptable

INSPECTION LOG SHEET FOR:
Weekly Inspection of SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES
AND MISCELLANEOUS EQUIPMENT

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE: (SIGN ON THE DAY INSPECTION IS PERFORMED; PERFORM INSPECTION ON THE SAME DAY EVERY WEEK.)				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

_____/_____/_____ DATE (M/D/Y)				
_____ TIME	_____ TIME	_____ TIME	_____ TIME	_____ TIME

SAFETY AND EMERGENCY EQUIPMENT

Fire Extinguishers: A N
If 'N', circle appropriate problem: overdue inspection, inadequately charged, inaccessible, other: _____

Eyewash and Shower: A N
If 'N', circle appropriate problem: disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, other: _____

First Aid Kit: A N
If 'N', circle appropriate problem: inadequate inventory, other: _____

Spill Cleanup Equipment: A N
If 'N', circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other: _____

Personal Protection Equipment: A N
If 'N', circle appropriate problem: inadequate supply of malfunctioning or inadequate aprons, gloves, glasses, respirators, emergency respirators, emergency respirator is missing components, items requiring security or clean environment are exposed to the environment, other: _____

Communication Devices: A N
If 'N', circle appropriate problem: inadequate supply of telephones, malfunctioning telephone(s), malfunctioning intercom, emergency alarm does not work, telephones are not located where needed, other: _____

SECURITY DEVICES

Gates and Locks: A N
If 'N', circle appropriate problem: sticking, corrosion, lack of warning signs, fit, other: _____

Fence: A N
If 'N', circle appropriate problem: broken ties, corrosion, holes, distortion, other: _____

MISCELLANEOUS EQUIPMENT

Dry Dumpster: A N
If 'N', circle appropriate problem: rust, corrosion, split seams, distortion, deterioration, excess debris, liquids in unit, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

**INSERT FACILITY
DRAWINGS HERE**



TERA, inc.

3100 South Gessner Road • Suite 650 • Houston, Texas 77063
P.O. Box 770039 • Houston, Texas 77215-0039
Tel. (713) 783-6292 • Fax (713) 783-3698

April 23, 1996
96-400-018

Mr. Peter Olsen
SAFETY-KLEEN CORP.
2720 Girard NE
Albuquerque, New Mexico 87107

Subject: Certification of Drum Storage Area, Farmington Branch, New Mexico

Dear Mr. Olsen:

On February 15, 1996, TERA conducted an inspection of the subject drum storage facility which is shown on attached Safety-Kleen Drawing No. 700821-7001-04. This inspection was to compare this facility to the requirements of 40 CFR 264 "Subpart I, Use and Management of Containers". This inspection was conducted by visual examination, measurements and calculations of available sump capacity.

SYSTEM DESCRIPTION

The drum storage area is an integral part of the warehouse portion of the main building at Farmington (please refer to Safety-Kleen Drawing No. 700821-0001-00). The area is completely surrounded by a curb which is 4 3/4 high by 6.5 inches wide except at the truck door entrance. This area contains a grate covered trench open to the drum area. This trench collects any leakage that might occur in the drum storage area. The floor and driveway slope away from the trench on the outside edge. This prevents any run-on of precipitation.

RESULTS OF INSPECTION

The following paragraphs compare this drum storage area to the requirements of 40 CFR 264.175:

- a. "Cracks, Gaps and Sufficiently Impervious" [40 CFR 264.175(b)(1)]

The area is free of any cracks or gaps and is coated such that it will contain leaks and spills. The entire unit is indoors under roof and thereby protected from any precipitation.

b. "Sloped to Drain" [40 CFR 264.175(b)(2)]

The floor area is sloped to drain to trench.

c. "Sufficient Capacity" [40 CFR 264.175(b)(3)]

The containment trench sizes are shown on the attached Safety-Kleen Drawing No. 700821-7001-04, Attachment B.

Calculations of trench capacity are shown on the drawing. This area has a trench capacity of 382 gallons, therefore it will support a storage capacity of 3,820 gallons.

d. "Run-on Prevented" [40 CFR 175(b)(4)]

The entire area is protected by its integral curb and appropriate sloping of the outside driveway at the doorway.

e. "Ignitable or Reactive Wastes" [40 CFR 264.176]

This area does not store flammables or reactive wastes.

f. "Incompatible Wastes" [40 CFR 264.177]

Wastes which are incompatible with one another are not stored in this area.

CERTIFICATION

Based on the results of the inspection and calculations, we conclude that this drum storage area meets the requirements of 40 CFR 264.175-177, Subpart I and New Mexico Environmental Improvement Board HWMR-6, Part 5.

* * *

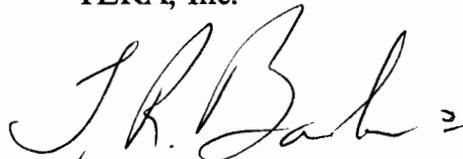
SAFETY-KLEEN CORP.
Mr. Peter Olsen
Page 3

TERA, Inc.
April 23, 1996
96-400-018

Should you have any questions on the above or if we can supply additional information, please contact me at 713/783-6292. Thank you for this opportunity to work with you and Safety-Kleen Corp.

Very truly yours,

TERA, Inc.



T. R. Barker, II, P.E.
Principal



Thomas H. Wimbrow, P.E.
President & Chief Engineer

TRB/da

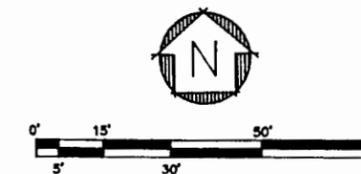
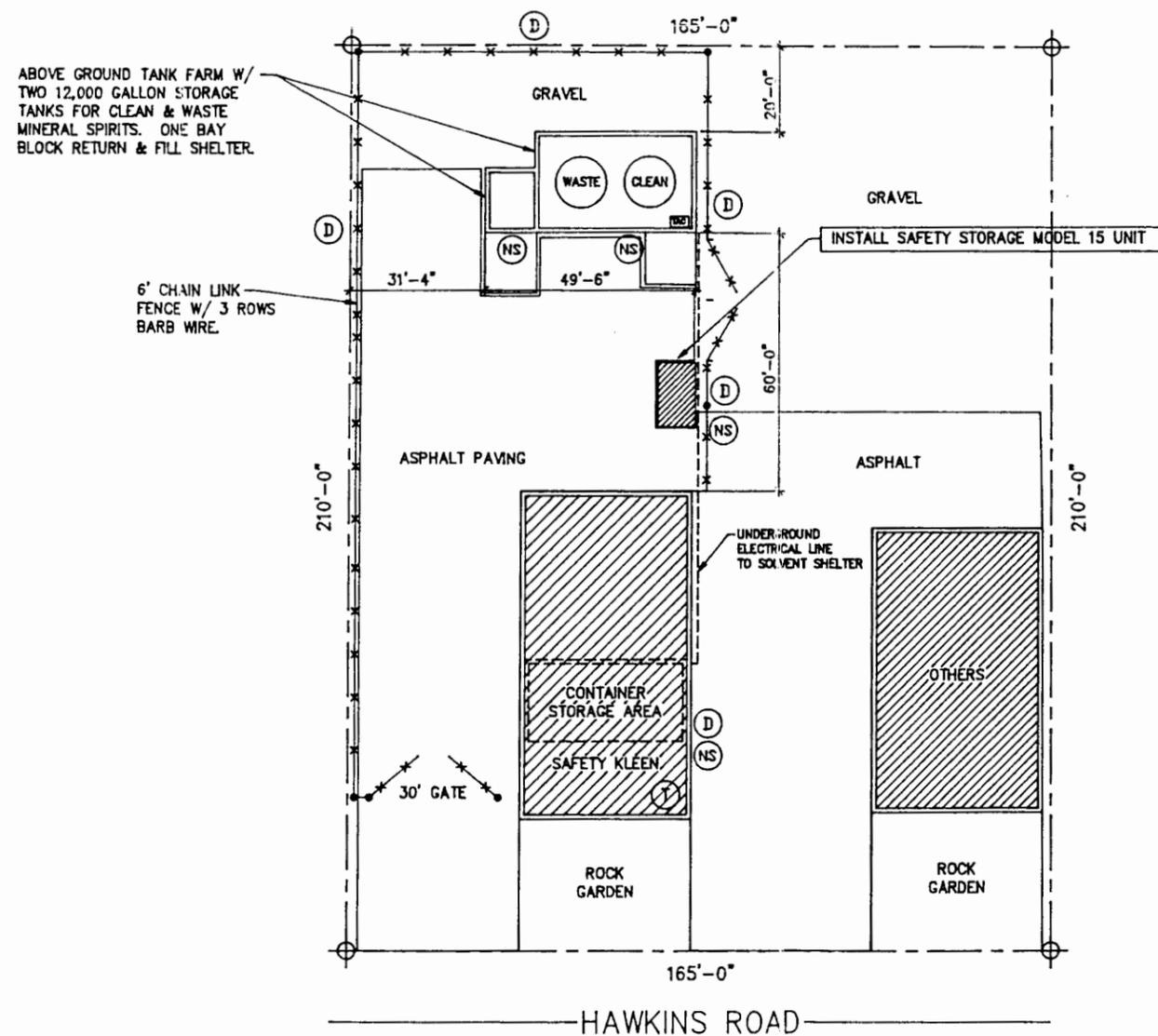
Attachment



APRIL 23, 1996

GENERAL NOTES

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- (T) (T) - TELEPHONE
- (FE) (FE) - FIRE EXTINGUISHER (TYPICAL 10# ABC)
- (FA) (FA) - FIRST AID STATION
- (D) (D) - 'DANGER' SIGN
- (NS) (NS) - 'NO SMOKING' SIGN
- (COR) (COR) - 'CORROSIVE' SIGN
- NEW ——— EXISTING

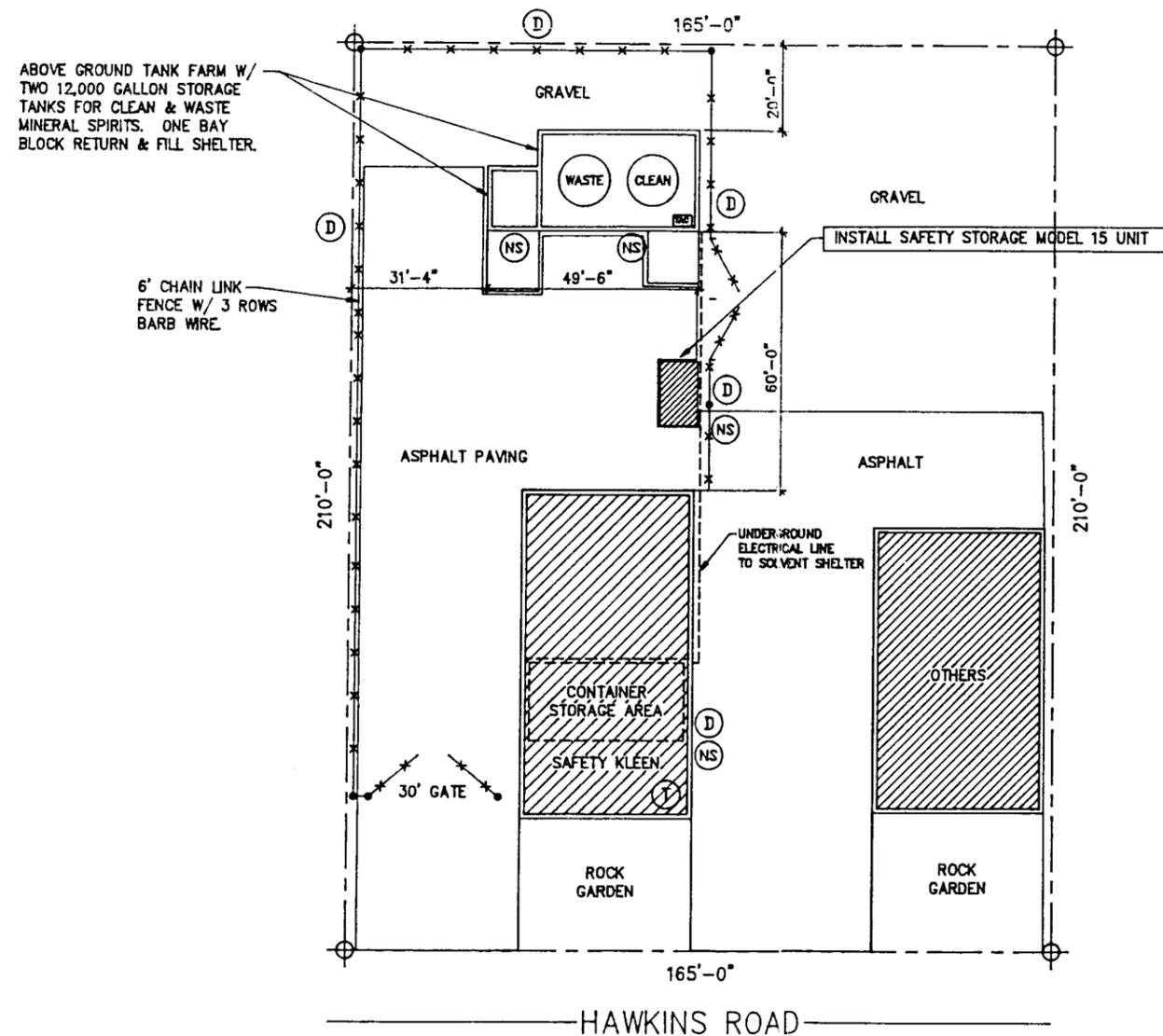
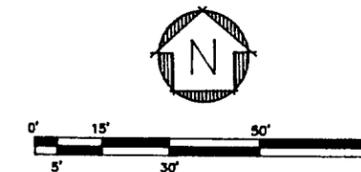
PLOT DATE: 1-14-97

REVISIONS				TITLE			
01	REVISE FENCE AND GATES. SHOW EXPANSION OF A/C AND INSTALLATION OF MODEL 15 SS UNIT	WEY		1-14-97	SITE PLAN 4200 HAWKINS ROAD		
00	REVISED SAFETY KLEEN DRAWING TO CADD AS DATED. REPLACES SAFETY KLEEN DRAWING D13712	AJ		1-25-97	SCALE 1" = 20'-0"	BY WEY	CHKD VEY
DESCRIPTION				DATE	SERVICE CENTER BRANCH AT FARMINGTON, N.M.		DATE 12/30/99
					STD-DWG-REV NO. 700821-0001-01		

S SAFETY-KLEEN CORP.
777 3RD TIMBER ROAD ELLEN, ILLINOIS 60123 PHONE 708-697-6400

GENERAL NOTES

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ABOVE GROUND TANK FARM W/ TWO 12,000 GALLON STORAGE TANKS FOR CLEAN & WASTE MINERAL SPIRITS. ONE BAY BLOCK RETURN & FILL SHELTER.

6' CHAIN LINK FENCE W/ 3 ROWS BARB WIRE.

INSTALL SAFETY STORAGE MODEL 15 UNIT

UNDERGROUND ELECTRICAL LINE TO SOLVENT SHELTER

- (T) (T) - TELEPHONE
 - (FE) (FE) - FIRE EXTINGUISHER (TYPICAL 10# ABC)
 - (FA) (FA) - FIRST AID STATION
 - (D) (D) - 'DANGER' SIGN
 - (NS) (NS) - 'NO SMOKING' SIGN
 - (COR) (COR) - 'CORROSIVE' SIGN
- NEW ——— EXISTING

PLOT DATE: 1-14-97

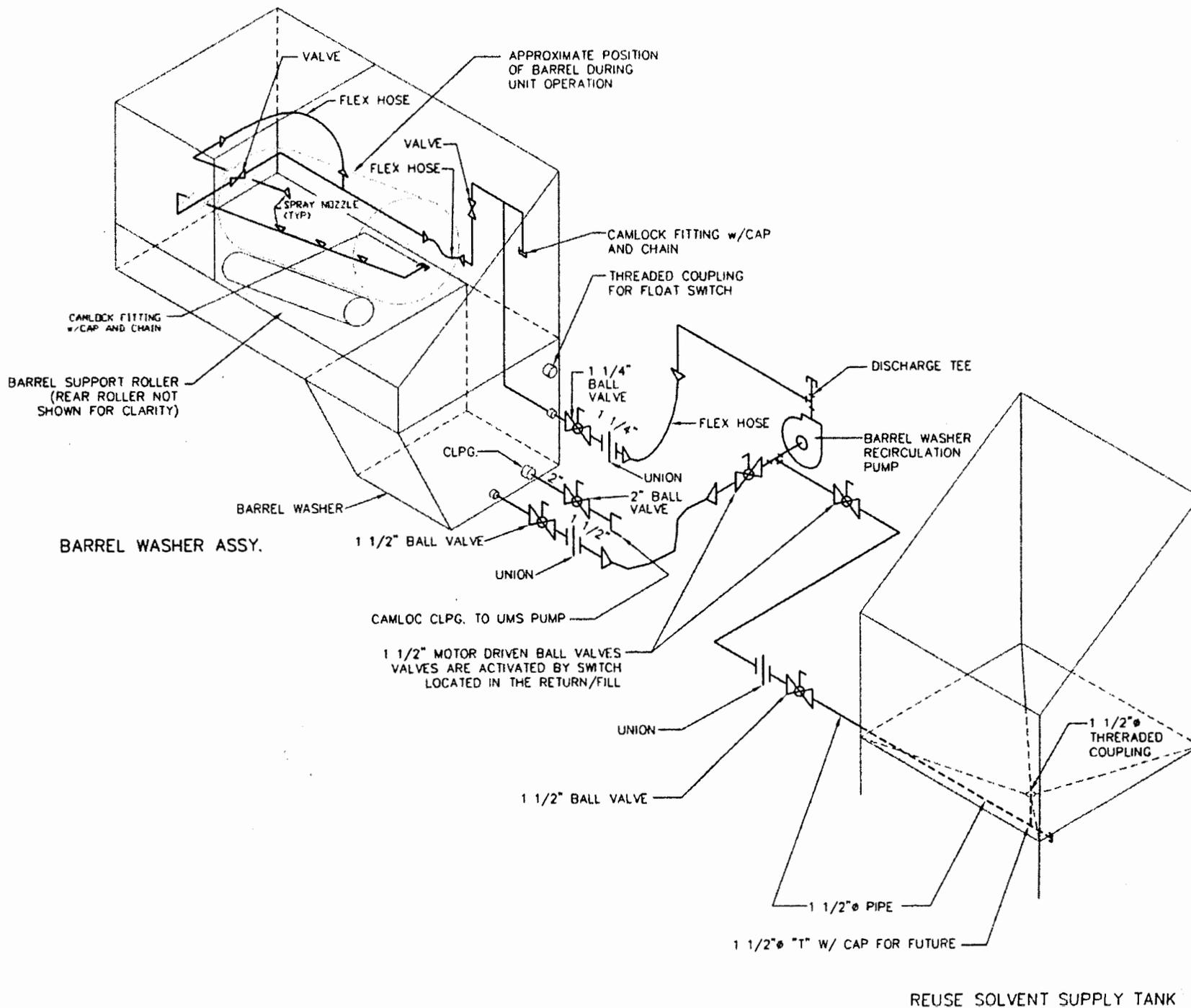
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00	REVISED SAFETY KLEEN DRAWING TO CAD AS DATED. REPLACES SAFETY KLEEN DRAWING D13712	AJ	1-25-97
NO.	DESCRIPTION	BY	CHK
		APPR	DATE
		SERVICE CENTER BRANCH AT FARMINGTON, N.M.	
		STD-DWG-REV NO. 700921-0001-01	

SITE PLAN
4200 HAWKINS ROAD

S SAFETY-KLEEN CORP.
777 SW TOWER ROAD ELBA, ALABAMA 36025 PHONE 706-697-0400

SCALE 1" = 20'-0" BY VEY CHKD P.E. APPR DP. APPR DATE 12/20/89

BARREL WASHER/ REUSE SOLVENT SUPPLY TANK PIPING ISOMETRIC



Attachment F

Contingency Plan

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 Resource Recovery Branch Manager is the emergency coordinator. The alternate emergency coordinator is a trained employee designated to this position by the emergency coordinator.

EMERGENCY NOTIFICATIONS: (See on next page)

**EMERGENCY INFORMATION
FARMINGTON NM 7-008-21**

A) FACILITY EMERGENCY COORDINATOR

NAME: JOE BIRKBY
TITLE: BRANCH AUTOMOTIVE MANAGER
HOME ADDRESS: CR 2960 # 24B
AZTEC NM 87410

TELEPHONE: 505-334-3357
CELL PHONE: 1-505-870-0583

ALTERNATE EMERGENCY COORDINATOR

NAME: KIM HOLDEN
TITLE: BRANCH ADMINISTRATIVE ASST
HOME ADDRESS: 1012 SYCAMORE ST
FARMINGTON NM 87401

TELEPHONE: 505-327-2881

B) EMERGENCY NOTIFICATION TELEPHONE NUMBERS

INTERNAL (24 HOUR) SAFETY KLEEN 1-800-468-1760

EXTERNAL: A: NATIONAL RESPONSE CENTER 1-800-424-8802

B: NMED HAZARDOUS AND RADIOACTIVE
MATERIALS BUREAU 1-505-827-9329

C) DESIGNATED EMERGENCY RESPONSE AUTHORITIES

A: FARMINGTON FIRE DEPARTMENT	EMERGENCY	911
	NON EMERGENCY	505-334-1951
B: FARMINGTON POLICE DEPARTMENT	EMERGENCY	911
	NON EMERGENCY	505-334-6622
C: SAN JUAN REGIONAL MEDICAL CENTER	EMERGENCY	505-325-5011
D: RINCHEM (CLEANUP CONTRACTOR)	EMERGENCY	505-345-3655
	24 HOUR	505-883-4242
E: POISON CONTROL CENTER	24 HOUR	800-432-6866

**EMERGENCY INFORMATION
FARMINGTON NM 7-008-21**

A) FACILITY EMERGENCY COORDINATOR

NAME: JOE BIRKBY
TITLE: BRANCH AUTOMOTIVE MANAGER
HOME ADDRESS: CR 2960 # 24B
AZTEC NM 87410

TELEPHONE: 505-334-3357

CELL PHONE: 1-505-870-0583

ALTERNATE EMERGENCY COORDINATOR

NAME: KIM HOLDEN
TITLE: BRANCH ADMINISTRATIVE ASST
HOME ADDRESS: 1012 SYCAMORE ST
FARMINGTON NM 87401

TELEPHONE: 505-327-2881

B) EMERGENCY NOTIFICATION TELEPHONE NUMBERS

INTERNAL (24 HOUR) SAFETY KLEEN 1-800-468-1760

EXTERNAL: A: NATIONAL RESPONSE CENTER 1-800-424-8802

B: NMED HAZARDOUS AND RADIOACTIVE
MATERIALS BUREAU 1-505-827-9329

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	NON EMERGENCY	505-334-1951
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	NON EMERGENCY	505-334-6622
C: SAN JUAN REGIONAL MEDICAL CENTER	EMERGENCY	505-325-5011
D: RINCHEM (CLEANUP CONTRACTOR)	EMERGENCY	505-345-3655
	24 HOUR	505-883-4242
E: POISON CONTROL CENTER	24 HOUR	800-432-6866

07/12/01 08:08 FAX 505 428 2567
Endo... duplicate... acquired.
For an additional fee, addresser's authorized agent, Restricted Delivery, in endorsement. If a postmark on the Certified Mail receipt is not needed, detach and affix label in this receipt and present it when...

HWB &/or DOE/OB

005



Certified Mail - Return receipt requested

May 30, 2001

Emergency Responsc Manager
Rinchem Inc
6133 Edith NE
Albuquerque N.M. 87109

RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849

Dear Sir or Madam:

Under 40 CFR 264.53, all revisions to a hazardous waste management facility's Contingency Plan must be provided to your office. The attached are updated pages for Safety Kleen's Contingency Plan. Please replace the appropriate pages in your copy with this updated information. If you do not have a copy of Safety Kleen's Contingency plan in your files, please contact our facility at 505-327-9070.

If you have any questions or desire to visit our facility, please contact us at the number above.

Sincerely,

Kim Holden
Branch Administrative Assist.
4210 A Hawkins Rd
Farmington, N.M. 87401



Certified Mail - Return receipt requested

May 30, 2001

Police Chief
Farmington Police Dept
800 Municipal Drive
Farmington NM 87401

RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849

Dear Sir or Madam:

Under 40 CFR 264.53, all revisions to a hazardous waste management facility's Contingency Plan must be provided to your office. The attached are updated pages for Safety Kleen's Contingency Plan. Please replace the appropriate pages in your copy with this updated information. If you do not have a copy of Safety Kleen's Contingency plan in your files, please contact our facility at 505-327-9070.

If you have any questions or desire to visit our facility, please contact us at the number above.

Sincerely,

Kim Holden
Branch Administrative Assist.
4210 A Hawkins Rd
Farmington, N.M. 87401

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May 30, 2001

Hospital Administrator
San Juan Regional Hospital
801 W Maple
Farmington, NM 87401

RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849

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May 30, 2001

**Battalion Chief
Farmington Fire Dept.
301 N Auburn
Farmington NM 87401**

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4210 A Hawkins Rd
Farmington, N.M. 87401
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Certified Mail - Return receipt requested

May 30, 2001

New Mexico Environmental Department
Hazardous and Radioactive Materials Bureau
P O Box 26110
Santa Fe NM 87502

RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849

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Kim Holden
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4210 A Hawkins Rd
Farmington, N.M. 87401

F.1 PURPOSE

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.

F.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 resource recovery branch manager is the emergency coordinator and the alternate emergency coordinator is trained employee designated to this position by the resource recovery branch manager.

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 Attachment F. Also listed in Attachment F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation.

F.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his alternate when the emergency coordinator is not available) must immediately:

- a. activate the internal facility communication system to notify all facility personnel;
- b. notify Safety-Kleen's Environment, Health and Safety Department using the 24-hour telephone number after working hours - ~~708-888-4660~~ ~~800/468-1760~~; and
- c. notify appropriate state or local agencies with designated response roles, if necessary.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do

this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

During an emergency, the emergency coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

F.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Environment, Health and Safety Department to report the incident. All releases, fires, and explosions necessitate the implementation of this contingency plan. Any situation that has the potential for releasing solvent or solvent vapors or causing a fire or explosion must be addressed in accordance with this plan. Should there be any questions as to whether this plan should be implemented (i.e. a problem is suspected but cannot be confirmed) the EHS and/or Technical Services Department must be contacted and assistance requested. The treatment, storage and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and
- b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

F.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

- a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.

- b. The coordinator must immediately notify the Environment, Health and Safety Department. The department will notify the New Mexico Environment Department (NMED) of any spill or release of hazardous waste within 24 hours (except for spills of one pound or less that are immediately cleaned up). The department will report to the New Mexico Environment Department (NMED) the following:
- (1) name and telephone number of notifier;
 - (2) name and address of facility;
 - (3) time and type of incident (e.g., release, fire);
 - (4) name and quantity of material(s) involved, to the extent known;
 - (5) the extent of injuries, if any; and
 - (6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with section 4.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 30 days of the incident, Safety-Kleen will submit a written report on the incident to the New Mexico Environment Department. The report will contain the information set out in Pt. V, 264.196(d)(3) and must include:

- a. name, address, and telephone number of the owner or operator;
- b. name, address, and telephone number of the facility;
- c. date, time, and type of incident (e.g., fire, explosion);
- d. name and quantity of material(s) involved;
- e. the extent of injuries, if any;
- f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. estimated quantity and disposition of recovered material that results from the incident.

F.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

- a. The person who discovers/causes the spill reports to the emergency coordinator.
- b. The emergency coordinator contacts the Environment, Health and Safety Dept.
- c. The Environment, Health and Safety Department reports to the New Mexico Environment Department.

F.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

<u>Agency or Authority</u>	<u>Rationale</u>
Police Department Fire Department	Notify if there is imminent danger to human health. Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
New Mexico HED	Report releases, fires, and explosions.
Rinchem	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. ~~Copies of example letters to the local police department, fire department and hospital are in Appendix F.~~

F.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections which follow.

F.3.1 Minor Spills

If a spill should occur while pouring spent solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill occur outside the

containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

- a. If the solvent spills on a paved area, it must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to the Safety-Kleen recycle center for proper disposal.
- b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. ~~Then, following the instructions of the appropriate Material Safety Data Sheet (Examples are in Appendix F),~~ the worker will enter the area wearing rubber gloves, aprons, safety glasses, and/or a respirator, collect the liquid, drum it and return it to storage. An explosion proof area is one in which special wiring has been used. Only the return and fill station contains this type of wiring.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Environment, Health and Safety Department and the department will contact the New Mexico Environment Department (if the spill is of a reportable quantity).

In the event a container needs emptying, a pump located on the facility will be used to remove the liquid and pump it to a new container. In the event liquid from a tank needs to be removed, tanker trucks will be used to remove the liquid and haul it to the recycle center. A wet/dry vacuum is present at the site to be used in the event of a minor spill. Sorbent pads can also be used to wipe up any minor spills.

F.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material which escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

- a. Assist any injured people.
- b. Stop the flow of solvent, if possible.

- c. Retain, contain or slow the flow of the solvent if it can not be stopped.
- d. If solvent escapes your containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Environment, Health and Safety Department.
- e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator shall report any incident as soon as possible to the Environment, Health and Safety Department using the 24-hour telephone number: ~~800/468-1760 708/888-4660~~. If the Environment, Health and Safety Department does not respond within thirty minutes, the emergency coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and New Mexico HED (telephone: 505/827-9329 - 24 hour number). Otherwise, the Environment, Health and Safety Department will contact the proper authorities.

The person reporting a spill should be prepared to give his name, position, company name, address and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed.

Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Contaminated equipment resulting from remedial actions for spills must be cleaned and decontaminated. If it is a paved or metal surface, this can be done using a detergent solution. ~~Every spill must be recorded on the Field Spill Report Form (Example of form used in Attachment F) and All incidents will be documented and kept on file as part of the operating record. They will be reviewed with branch personnel to prevent similar spills from occurring in the future. A copy of this report is sent to the Environment, Health and Safety Department.~~

All rinsates and other residues from the cleanup of spills or releases whether major or minor, will be containerized and treated as hazardous waste unless they have been analyzed and determined not to be hazardous. They may not be disposed of on the land unless they meet the relevant treatment standards specified in HWMR-5, Part VIII.

F.3.3 Fire Control Procedures

If a fire occurs, personnel must act quickly with the fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately and/or an explosion occurs, evacuate the facility and call the fire and police departments.

Vapors of ~~mineral spirits solvent~~ exposed to a spark or open flame can flash at temperatures over 105° F. A solvent fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

~~Old 609~~ formula immersion Cleaner (which is a mixture of chlorinated solvents, cresylic acid and an alkaline solution), and dry cleaning wastes are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (about 1200° F). ~~New 699~~ formula immersion cleaner also is not flammable. However, incomplete combustion can generate carbon monoxide and other toxic vapors. The potential for the materials reaching a decomposition state is minimal; however, branch personnel and local authorities must be aware of the proper response, should a fire affect the drum storage areas:

- a. Isolate the hazard area and deny entry to unauthorized personnel.
- b. Stay upwind; keep out of low areas.
- c. Ventilate closed spaces before entering them.
- d. Wear positive pressure breathing apparatus and protective clothing.
- e. Evacuate a 600 foot radius area endangered by the gas.
- f. Cool the area and containers with water until well after the fire has been extinguished.

A fire in the drum storage area can best be extinguished by foam, water fog, or water spray.

Explosions may result in the spread of fire, unstable structures, and other hazardous conditions at the facility. Therefore, the site must not be re-entered until the fire department and Safety-Kleen's insurance company have determined it is safe to do so. Action must be taken to ensure that fires, explosions, or releases do not occur or reoccur. These include removing the source of the problem, repairing or remediating the source of the problem, coding areas subject to fires and explosions and replacing faulty equipment.

F.4 EVACUATION PLAN

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Hawkins Road to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

F.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

The emergency coordinator and his alternates have been trained using this contingency plan as well as in a classroom setting. They have references such as various state members at the corporate office and the Material Safety Data Sheets to help them make decisions during an emergency.

An emergency response contractor is identified on the Emergency Information Sheet (Page F-2)(Appendix F). This contractor will provide emergency assistance during a release and/or cleanup.

F.6 POLLUTION INCIDENT HISTORY

There are no records of a pollution incident having occurred at this facility.

F.7 IMPLEMENTATION SCHEDULE

Any discrepancies or deficiencies found during the routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The branch manager has the overall responsibility for remediating any discrepancies found during the routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

F.8 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information sheet (Appendix F) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

- a. the facility permittee is modified to allow new wastes to be stored or treated, or applicable regulations are revised;
- b. the list or location of emergency equipment changes;
- c. the facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
 - (1) increases the potential for fires, explosions, or releases of hazardous constituents, or
 - (2) changes the response necessary in an emergency;
- d. the names, addresses, or phone numbers of emergency coordinators change;

- e. the employee assigned to each emergency task changes; or
- f. the plan fails when implemented in an emergency.

Attachment G

Closure Plan

CLOSURE PLAN
ABSTRACT

LOCATION ADDRESS: Safety-Kleen Corp. (7-008-21)
4210 A Hawkins Road
Farmington, New Mexico 87401

U.S. EPA I.D. NO: NMD 980698849

WASTE UNITS TO UNDERGO CLOSURE:

- a. Tank Storage - one 12,000 gallon aboveground storage tank
- b. Drum Storage - an area of about 187 square feet with a storage capacity of 4,464 3,820 gallons.
- c. Return and Fill Station - The location of this waste management unit is shown in the Site Plan. It can hold 3,175 gallons of waste, but typically operates at approximately 15 gallons.

The volumes shown above are the maximum amounts which will be stored at this facility.

CLOSURE PLAN

G.1 PURPOSE

The Farmington service center operates as a storage facility for hazardous wastes, and Safety-Kleen believes it is required that it be closed in accordance with the closure requirements of New Mexico HWMR 206.C. Closure of the facility will be carried out in accordance with the steps outlined in this plan and ~~Appendix Attachment~~ H contains an estimated ~~schedule and cost~~ for the completion of closure. Safety-Kleen will remove all hazardous wastes and residuals from the facility and will therefore eliminate the need for further maintenance and care. The expected year of closure for this facility is 2020. An outside contractor will be performing the closure clean up and sampling activities. The contractor will have worked with Safety-Kleen prior to clean up so we can be aware of their capabilities. A state licensed professional engineer will be on site periodically to certify the adequacy of the clean up activity.

G.2 ABOVEGROUND TANK AND ASSOCIATED PIPING

To safely clean and decommission the aboveground storage tank:

- a. Remove the remaining material from the tank and return the material to the Recycle Center for reclamation.
- b. Provide access to the tank.
- c. Rinse, scrape and squeegee the tank interior, removing all residual waste material and rinsate.
- d. Disconnect and decontaminate all appurtenant piping and pumping equipment.
- e. Remove tank and appurtenant equipment and reuse or sell as scrap.
- f. Clean and raze the diking and slab.
- g. Backfill all excavations with clean fill materials.
- h. Transport and dispose of all waste material generated during the project.

G.2.1 Removal of Waste Material and Opening of the Tank

The contents of the tank must be removed using a pump, vacuum or similar equipment and then be shipped by tanker truck to a reclaimer.

To gain access to aboveground tanks, use the manway at the ~~top-bottom~~ of the tank. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Prior to entering the tank, personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they must be provided with positive

ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

G.2.2 Removal of Residual Waste and Cleaning of Tank

Before removing any residual waste from the tank, all piping and appurtenant equipment will be flushed with clean ~~mineral spirits solvent~~ followed by a detergent solution.

The method used to remove the residual waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see section G.2.1).

Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high pressure wash system using clean solvent and a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be shipped to a reclaimer. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures:

- a. Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.
- b. Supply valves must be closed and tagged and bleeder valves left open; or supply piping should be disconnected.
- c. Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "Off".
- d. On tanks where flammable vapors may be present, all sources of ignition must be removed.
- e. Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test". In all tank entering situations, an oxygen deficiency test shall also be performed prior to tank entry. Both flash test and oxygen deficiency test will be performed by the supervisor of the area in which the work is being done.
- f. Under conditions where there exists a possibility (no matter how remote) of toxic vapors being present in the tank to be entered, the supervisor will arrange to have the air tested. The results of all tests will be displayed on site.\

- g. There must be a set of wristlets or a rescue harness and sufficient rope at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.
- h. Workers should wear rescue harnesses if entering a tank with a large enough opening to easily affect a rescue. In tanks with small openings, only wristlets may be used. In cases where there are agitator shafts, drums or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the lifeline may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- i. A constant source of fresh air must be provided to insure a complete change of air every few minutes. In cases of short term entry for inspection or removal of objects, an air mask is recommended. In cases of long term entry the use of an air mover should be considered.
- j. When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.
- k. Adequate illumination must be provided and a flashlight or other battery operated light must also be on hand to provide illumination for a safe exit in the event of an electrical power failure.
- l. All electrical equipment to be used inside the tank must be in good repair and grounded.
- m. Other people working in the immediate area will be informed of the work being done, and they must inform the watcher or supervisor immediately of any unusual occurrence which makes it necessary to evacuate the tank.
- n. The Watcher or Standby Observer System must be implemented. It consists of the following:
 - (1) Workers inside a confined space must be under the constant observation of a fully instructed watcher.
 - (2) Before anyone enters the tank, the watcher will be instructed by the person in charge of the entry that an entry authorization must be obtained from the person in charge and a rescue harness or wristlets must be used on the job.
 - (3) The watcher must also know the location of the nearest telephone (with emergency numbers posted), eyewash and/or shower, fire extinguisher and oxygen inhalator. For all "hot work" inside a tank, the watcher must be instructed how to shut down the welding/burning equipment.

- (4) As long as anyone is inside the vessel, the watcher must remain in continuous contact with the worker. HE IS NOT TO LEAVE THE JOB SITE EXCEPT TO REPORT AN EMERGENCY. He does not enter the tank until help is available.
- (5) After being instructed in his responsibilities, the watcher will sign a form indicating his understanding.
- o. All welding and burning equipment must be provided with a shutoff under the control of the watcher; and the watcher must be shown how to shut off the equipment if it becomes necessary. Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
- p. For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site and standard welding and burning safety precautions will always be followed.

G.2.3 Removal of the Tank

To safely remove the tank:

- a. Disconnect all appurtenant piping.
- b. Disconnect all appurtenant pumping equipment.
- c. The tanks and piping shall be removed and disposed of at a properly permitted landfill. The final rinsate must be sampled and analyzed for volatile organic compounds to determine the cleanliness of the tank and its piping. If any volatile organic compounds are present above detection limits, the washing and rinsing must be repeated until they are no longer detectable.
- d. The dike will be cleaned and razed. It will be disposed of at a properly permitted landfill.
- e. Sample and analyze for ~~mineral spirits solvent~~ and TCLP contaminants (except pesticides) beneath the tank farm. If contamination is indicated, it will be confirmed with an extent of contamination soil study. The soil will be over-excavated or otherwise treated to eliminate the contamination. Soil samples must be collected and analyzed after cleanup to insure decontamination has been achieved.
- f. Backfill the excavation with clean fill materials and grade to ground level.

G.3 DRUM STORAGE AREA IN WAREHOUSE

The drum storage area is used for the storage of drums of used immersion cleaner and dry cleaning waste. At closure, all the drums will be removed and transported to a reclaimer after proper

packaging, labeling and manifesting. The contents of the drums will be reclaimed and the drums will be cleaned for reuse.

The concrete floor and spill containment sumps will be cleaned with a detergent solution and the final rinsate will be analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If any volatile organic compounds are present, the washing and rinsing must be repeated until they are no longer detectable or to levels agreed upon with the EID. If any cracks are present soil samples must be collected from beneath the cracks and analyzed for volatile organic compounds. If contamination is present, a workplan must be developed to determine the extent of contamination and proper remedial action. Any other wastes generated in the closure process will be reclaimed or properly disposed of.

G.4 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used ~~mineral spirits~~ solvents to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, the sediment in the dumpsters will be removed and drummed, labeled, and manifested and then shipped to a reclaimer.

The dumpster and the dock area will be thoroughly rinsed with a detergent solution. The rinsate is discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described earlier. The final rinsate must be analyzed for volatile organic compounds. If any are present above detection levels, the washing and rinsing must be repeated until they are no longer detectable. The clean dumpster and dock structure will be reused by Safety-Kleen or scrapped.

G.5 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Safety-Kleen will notify the Environmental Improvement Division (EID) at least 45 days in advance of known closure. Closure activities will begin within 30 days of receipt of the known last volume of hazardous waste. Within 90 days of receiving the known last volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Mexico Health and Environment Dept. may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

- a. the facility has the capacity to receive additional wastes;
- b. there is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or
- c. closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

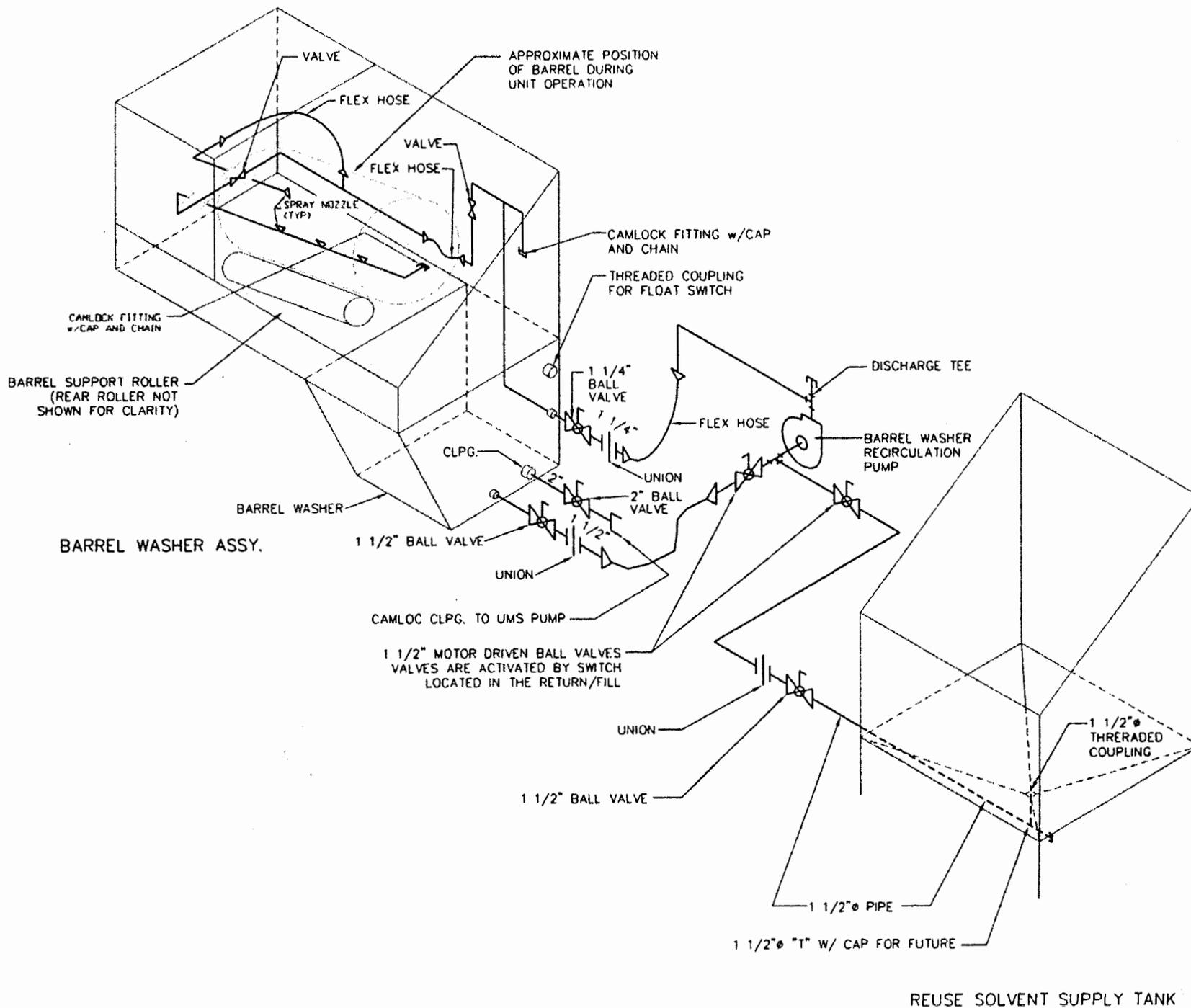
When closure is completed, Safety-Kleen shall submit to the New Mexico Health and Environment Dept. certification, both by the operator and by an independent registered professional engineer, that the facility has been closed in accordance with the approved closure plan.

ATTACHMENT G - 1

ESTIMATED CLOSURE COSTS

BARREL WASHER/ REUSE SOLVENT SUPPLY TANK PIPING ISOMETRIC

Safety-Kleen Farmington, NM Facility
 Hazardous Waste Permit
 Page Modified June 27, 2000



Attachment F

Contingency Plan

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 Resource Recovery Branch Manager is the emergency coordinator. The alternate emergency coordinator is a trained employee designated to this position by the emergency coordinator.

EMERGENCY NOTIFICATIONS: (See on next page)

**EMERGENCY INFORMATION
FARMINGTON NM 7-008-21**

A) FACILITY EMERGENCY COORDINATOR

NAME: JOE BIRKBY
TITLE: BRANCH AUTOMOTIVE MANAGER
HOME ADDRESS: CR 2960 # 24B
AZTEC NM 87410

TELEPHONE: 505-334-3357
CELL PHONE: 1-505-870-0583

ALTERNATE EMERGENCY COORDINATOR

NAME: KIM HOLDEN
TITLE: BRANCH ADMINISTRATIVE ASST
HOME ADDRESS: 1012 SYCAMORE ST
FARMINGTON NM 87401

TELEPHONE: 505-327-2881

B) EMERGENCY NOTIFICATION TELEPHONE NUMBERS

INTERNAL (24 HOUR) SAFETY KLEEN 1-800-468-1760

EXTERNAL: A: NATIONAL RESPONSE CENTER 1-800-424-8802

B: NMED HAZARDOUS AND RADIOACTIVE
MATERIALS BUREAU 1-505-827-9329

C) DESIGNATED EMERGENCY RESPONSE AUTHORITIES

A: FARMINGTON FIRE DEPARTMENT	EMERGENCY	911
	NON EMERGENCY	505-334-1951
B: FARMINGTON POLICE DEPARTMENT	EMERGENCY	911
	NON EMERGENCY	505-334-6622
C: SAN JUAN REGIONAL MEDICAL CENTER	EMERGENCY	505-325-5011
D: RINCHEM (CLEANUP CONTRACTOR)	EMERGENCY	505-345-3655
	24 HOUR	505-883-4242
E: POISON CONTROL CENTER	24 HOUR	800-432-6866

**EMERGENCY INFORMATION
FARMINGTON NM 7-008-21**

A) FACILITY EMERGENCY COORDINATOR

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TITLE: BRANCH AUTOMOTIVE MANAGER
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May 30, 2001

Emergency Responsc Manager
Rinchem Inc
6133 Edith NE
Albuquerque N.M. 87109

RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849

Dear Sir or Madam:

Under 40 CFR 264.53, all revisions to a hazardous waste management facility's Contingency Plan must be provided to your office. The attached are updated pages for Safety Kleen's Contingency Plan. Please replace the appropriate pages in your copy with this updated information. If you do not have a copy of Safety Kleen's Contingency plan in your files, please contact our facility at 505-327-9070.

If you have any questions or desire to visit our facility, please contact us at the number above.

Sincerely,

Kim Holden
Branch Administrative Assist.
4210 A Hawkins Rd
Farmington, N.M. 87401



Certified Mail - Return receipt requested

May 30, 2001

Police Chief
Farmington Police Dept
800 Municipal Drive
Farmington NM 87401

RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849

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Sincerely,

Kim Holden
Branch Administrative Assist.
4210 A Hawkins Rd
Farmington, N.M. 87401

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May 30, 2001

Hospital Administrator
San Juan Regional Hospital
801 W Maple
Farmington, NM 87401

RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849

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Sincerely,

Kim Holden
Branch Administrative Assist.
4210 A Hawkins Rd
Farmington, N.M. 87401

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- Condition must meet USPS



Certified Mail - Return receipt requested

May 30, 2001

**Battalion Chief
Farmington Fire Dept.
301 N Auburn
Farmington NM 87401**

**RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849**

Dear Sir or Madam:

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If you have any questions or desire to visit our facility, please contact us at the number above.

Sincerely,

**Kim Holden
Branch Administrative Assist.
4210 A Hawkins Rd
Farmington, N.M. 87401**

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Certified Mail - Return receipt requested

May 30, 2001

New Mexico Environmental Department
Hazardous and Radioactive Materials Bureau
P O Box 26110
Santa Fe NM 87502

RE: Safety Kleen Systems Inc 7-008-21
4210 A Hawkins Rd
Farmington, N.M. 87401
EPA ID no. NMD980698849

Dear Sir or Madam:

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If you have any questions or desire to visit our facility, please contact us at the number above.

Sincerely,

Kim Holden
Branch Administrative Assist.
4210 A Hawkins Rd
Farmington, N.M. 87401

F.1 PURPOSE

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.

F.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 resource recovery branch manager is the emergency coordinator and the alternate emergency coordinator is trained employee designated to this position by the resource recovery branch manager.

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 Attachment F. Also listed in Attachment F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation.

F.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his alternate when the emergency coordinator is not available) must immediately:

- a. activate the internal facility communication system to notify all facility personnel;
- b. notify Safety-Kleen's Environment, Health and Safety Department using the 24-hour telephone number after working hours - ~~708-888-4660~~ 800/468-1760; and
- c. notify appropriate state or local agencies with designated response roles, if necessary.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do

this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

During an emergency, the emergency coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

F.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Environment, Health and Safety Department to report the incident. All releases, fires, and explosions necessitate the implementation of this contingency plan. Any situation that has the potential for releasing solvent or solvent vapors or causing a fire or explosion must be addressed in accordance with this plan. Should there be any questions as to whether this plan should be implemented (i.e. a problem is suspected but cannot be confirmed) the EHS and/or Technical Services Department must be contacted and assistance requested. The treatment, storage and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and
- b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

F.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

- a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.

- b. The coordinator must immediately notify the Environment, Health and Safety Department. The department will notify the New Mexico Environment Department (NMED) of any spill or release of hazardous waste within 24 hours (except for spills of one pound or less that are immediately cleaned up). The department will report to the New Mexico Environment Department (NMED) the following:
- (1) name and telephone number of notifier;
 - (2) name and address of facility;
 - (3) time and type of incident (e.g., release, fire);
 - (4) name and quantity of material(s) involved, to the extent known;
 - (5) the extent of injuries, if any; and
 - (6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with section 4.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 30 days of the incident, Safety-Kleen will submit a written report on the incident to the New Mexico Environment Department. The report will contain the information set out in Pt. V, 264.196(d)(3) and must include:

- a. name, address, and telephone number of the owner or operator;
- b. name, address, and telephone number of the facility;
- c. date, time, and type of incident (e.g., fire, explosion);
- d. name and quantity of material(s) involved;
- e. the extent of injuries, if any;
- f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. estimated quantity and disposition of recovered material that results from the incident.

F.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

- a. The person who discovers/causes the spill reports to the emergency coordinator.
- b. The emergency coordinator contacts the Environment, Health and Safety Dept.
- c. The Environment, Health and Safety Department reports to the New Mexico Environment Department.

F.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

<u>Agency or Authority</u>	<u>Rationale</u>
Police Department Fire Department	Notify if there is imminent danger to human health. Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
New Mexico HED	Report releases, fires, and explosions.
Rinchem	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. ~~Copies of example letters to the local police department, fire department and hospital are in Appendix F.~~

F.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections which follow.

F.3.1 Minor Spills

If a spill should occur while pouring spent solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill occur outside the

containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

- a. If the solvent spills on a paved area, it must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to the Safety-Kleen recycle center for proper disposal.
- b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. ~~Then, following the instructions of the appropriate Material Safety Data Sheet (Examples are in Appendix F),~~ the worker will enter the area wearing rubber gloves, aprons, safety glasses, and/or a respirator, collect the liquid, drum it and return it to storage. An explosion proof area is one in which special wiring has been used. Only the return and fill station contains this type of wiring.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Environment, Health and Safety Department and the department will contact the New Mexico Environment Department (if the spill is of a reportable quantity).

In the event a container needs emptying, a pump located on the facility will be used to remove the liquid and pump it to a new container. In the event liquid from a tank needs to be removed, tanker trucks will be used to remove the liquid and haul it to the recycle center. A wet/dry vacuum is present at the site to be used in the event of a minor spill. Sorbent pads can also be used to wipe up any minor spills.

F.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material which escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

- a. Assist any injured people.
- b. Stop the flow of solvent, if possible.

- c. Retain, contain or slow the flow of the solvent if it can not be stopped.
- d. If solvent escapes your containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Environment, Health and Safety Department.
- e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator shall report any incident as soon as possible to the Environment, Health and Safety Department using the 24-hour telephone number: ~~800/468-1760 708/888-4660~~. If the Environment, Health and Safety Department does not respond within thirty minutes, the emergency coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and New Mexico HED (telephone: 505/827-9329 - 24 hour number). Otherwise, the Environment, Health and Safety Department will contact the proper authorities.

The person reporting a spill should be prepared to give his name, position, company name, address and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed.

Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Contaminated equipment resulting from remedial actions for spills must be cleaned and decontaminated. If it is a paved or metal surface, this can be done using a detergent solution. ~~Every spill must be recorded on the Field Spill Report Form (Example of form used in Attachment F) and All incidents will be documented and kept on file as part of the operating record. They will be reviewed with branch personnel to prevent similar spills from occurring in the future. A copy of this report is sent to the Environment, Health and Safety Department.~~

All rinsates and other residues from the cleanup of spills or releases whether major or minor, will be containerized and treated as hazardous waste unless they have been analyzed and determined not to be hazardous. They may not be disposed of on the land unless they meet the relevant treatment standards specified in HWMR-5, Part VIII.

F.3.3 Fire Control Procedures

If a fire occurs, personnel must act quickly with the fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately and/or an explosion occurs, evacuate the facility and call the fire and police departments.

Vapors of ~~mineral spirits solvent~~ exposed to a spark or open flame can flash at temperatures over 105° F. A solvent fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

~~Old 609~~ formula immersion Cleaner (which is a mixture of chlorinated solvents, cresylic acid and an alkaline solution), and dry cleaning wastes are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (about 1200° F). ~~New 699~~ formula immersion cleaner also is not flammable. However, incomplete combustion can generate carbon monoxide and other toxic vapors. The potential for the materials reaching a decomposition state is minimal; however, branch personnel and local authorities must be aware of the proper response, should a fire affect the drum storage areas:

- a. Isolate the hazard area and deny entry to unauthorized personnel.
- b. Stay upwind; keep out of low areas.
- c. Ventilate closed spaces before entering them.
- d. Wear positive pressure breathing apparatus and protective clothing.
- e. Evacuate a 600 foot radius area endangered by the gas.
- f. Cool the area and containers with water until well after the fire has been extinguished.

A fire in the drum storage area can best be extinguished by foam, water fog, or water spray.

Explosions may result in the spread of fire, unstable structures, and other hazardous conditions at the facility. Therefore, the site must not be re-entered until the fire department and Safety-Kleen's insurance company have determined it is safe to do so. Action must be taken to ensure that fires, explosions, or releases do not occur or reoccur. These include removing the source of the problem, repairing or remediating the source of the problem, coding areas subject to fires and explosions and replacing faulty equipment.

F.4 EVACUATION PLAN

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Hawkins Road to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

F.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

The emergency coordinator and his alternates have been trained using this contingency plan as well as in a classroom setting. They have references such as various state members at the corporate office and the Material Safety Data Sheets to help them make decisions during an emergency.

An emergency response contractor is identified on the Emergency Information Sheet (Page F-2)(Appendix F). This contractor will provide emergency assistance during a release and/or cleanup.

F.6 POLLUTION INCIDENT HISTORY

There are no records of a pollution incident having occurred at this facility.

F.7 IMPLEMENTATION SCHEDULE

Any discrepancies or deficiencies found during the routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The branch manager has the overall responsibility for remediating any discrepancies found during the routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

F.8 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information sheet (Appendix F) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

- a. the facility permittee is modified to allow new wastes to be stored or treated, or applicable regulations are revised;
- b. the list or location of emergency equipment changes;
- c. the facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
 - (1) increases the potential for fires, explosions, or releases of hazardous constituents, or
 - (2) changes the response necessary in an emergency;
- d. the names, addresses, or phone numbers of emergency coordinators change;

- e. the employee assigned to each emergency task changes; or
- f. the plan fails when implemented in an emergency.

Attachment G

Closure Plan

CLOSURE PLAN
ABSTRACT

LOCATION ADDRESS: Safety-Kleen Corp. (7-008-21)
4210 A Hawkins Road
Farmington, New Mexico 87401

U.S. EPA I.D. NO: NMD 980698849

WASTE UNITS TO UNDERGO CLOSURE:

- a. Tank Storage - one 12,000 gallon aboveground storage tank
- b. Drum Storage - an area of about 187 square feet with a storage capacity of 4,464
3,820 gallons.
- c. Return and Fill Station - The location of this waste management unit is shown in the
Site Plan. It can hold 3,175 gallons of waste, but typically operates at approximately
15 gallons.

The volumes shown above are the maximum amounts which will be stored at this facility.

CLOSURE PLAN

G.1 PURPOSE

The Farmington service center operates as a storage facility for hazardous wastes, and Safety-Kleen believes it is required that it be closed in accordance with the closure requirements of New Mexico HWMR 206.C. Closure of the facility will be carried out in accordance with the steps outlined in this plan and ~~Appendix Attachment~~ H contains an estimated ~~schedule and cost~~ for the completion of closure. Safety-Kleen will remove all hazardous wastes and residuals from the facility and will therefore eliminate the need for further maintenance and care. The expected year of closure for this facility is 2020. An outside contractor will be performing the closure clean up and sampling activities. The contractor will have worked with Safety-Kleen prior to clean up so we can be aware of their capabilities. A state licensed professional engineer will be on site periodically to certify the adequacy of the clean up activity.

G.2 ABOVEGROUND TANK AND ASSOCIATED PIPING

To safely clean and decommission the aboveground storage tank:

- a. Remove the remaining material from the tank and return the material to the Recycle Center for reclamation.
- b. Provide access to the tank.
- c. Rinse, scrape and squeegee the tank interior, removing all residual waste material and rinsate.
- d. Disconnect and decontaminate all appurtenant piping and pumping equipment.
- e. Remove tank and appurtenant equipment and reuse or sell as scrap.
- f. Clean and raze the diking and slab.
- g. Backfill all excavations with clean fill materials.
- h. Transport and dispose of all waste material generated during the project.

G.2.1 Removal of Waste Material and Opening of the Tank

The contents of the tank must be removed using a pump, vacuum or similar equipment and then be shipped by tanker truck to a reclaimer.

To gain access to aboveground tanks, use the manway at the ~~top-bottom~~ of the tank. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Prior to entering the tank, personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they must be provided with positive

ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

G.2.2 Removal of Residual Waste and Cleaning of Tank

Before removing any residual waste from the tank, all piping and appurtenant equipment will be flushed with clean ~~mineral spirits solvent~~ followed by a detergent solution.

The method used to remove the residual waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see section G.2.1).

Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high pressure wash system using clean solvent and a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be shipped to a reclaimer. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures:

- a. Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.
- b. Supply valves must be closed and tagged and bleeder valves left open; or supply piping should be disconnected.
- c. Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "Off".
- d. On tanks where flammable vapors may be present, all sources of ignition must be removed.
- e. Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test". In all tank entering situations, an oxygen deficiency test shall also be performed prior to tank entry. Both flash test and oxygen deficiency test will be performed by the supervisor of the area in which the work is being done.
- f. Under conditions where there exists a possibility (no matter how remote) of toxic vapors being present in the tank to be entered, the supervisor will arrange to have the air tested. The results of all tests will be displayed on site.\

- g. There must be a set of wristlets or a rescue harness and sufficient rope at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.
- h. Workers should wear rescue harnesses if entering a tank with a large enough opening to easily affect a rescue. In tanks with small openings, only wristlets may be used. In cases where there are agitator shafts, drums or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the lifeline may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- i. A constant source of fresh air must be provided to insure a complete change of air every few minutes. In cases of short term entry for inspection or removal of objects, an air mask is recommended. In cases of long term entry the use of an air mover should be considered.
- j. When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.
- k. Adequate illumination must be provided and a flashlight or other battery operated light must also be on hand to provide illumination for a safe exit in the event of an electrical power failure.
- l. All electrical equipment to be used inside the tank must be in good repair and grounded.
- m. Other people working in the immediate area will be informed of the work being done, and they must inform the watcher or supervisor immediately of any unusual occurrence which makes it necessary to evacuate the tank.
- n. The Watcher or Standby Observer System must be implemented. It consists of the following:
 - (1) Workers inside a confined space must be under the constant observation of a fully instructed watcher.
 - (2) Before anyone enters the tank, the watcher will be instructed by the person in charge of the entry that an entry authorization must be obtained from the person in charge and a rescue harness or wristlets must be used on the job.
 - (3) The watcher must also know the location of the nearest telephone (with emergency numbers posted), eyewash and/or shower, fire extinguisher and oxygen inhalator. For all "hot work" inside a tank, the watcher must be instructed how to shut down the welding/burning equipment.

- (4) As long as anyone is inside the vessel, the watcher must remain in continuous contact with the worker. HE IS NOT TO LEAVE THE JOB SITE EXCEPT TO REPORT AN EMERGENCY. He does not enter the tank until help is available.
- (5) After being instructed in his responsibilities, the watcher will sign a form indicating his understanding.
- o. All welding and burning equipment must be provided with a shutoff under the control of the watcher; and the watcher must be shown how to shut off the equipment if it becomes necessary. Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
- p. For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site and standard welding and burning safety precautions will always be followed.

G.2.3 Removal of the Tank

To safely remove the tank:

- a. Disconnect all appurtenant piping.
- b. Disconnect all appurtenant pumping equipment.
- c. The tanks and piping shall be removed and disposed of at a properly permitted landfill. The final rinsate must be sampled and analyzed for volatile organic compounds to determine the cleanliness of the tank and its piping. If any volatile organic compounds are present above detection limits, the washing and rinsing must be repeated until they are no longer detectable.
- d. The dike will be cleaned and razed. It will be disposed of at a properly permitted landfill.
- e. Sample and analyze for ~~mineral spirits solvent~~ and TCLP contaminants (except pesticides) beneath the tank farm. If contamination is indicated, it will be confirmed with an extent of contamination soil study. The soil will be over-excavated or otherwise treated to eliminate the contamination. Soil samples must be collected and analyzed after cleanup to insure decontamination has been achieved.
- f. Backfill the excavation with clean fill materials and grade to ground level.

G.3 DRUM STORAGE AREA IN WAREHOUSE

The drum storage area is used for the storage of drums of used immersion cleaner and dry cleaning waste. At closure, all the drums will be removed and transported to a reclaimer after proper

packaging, labeling and manifesting. The contents of the drums will be reclaimed and the drums will be cleaned for reuse.

The concrete floor and spill containment sumps will be cleaned with a detergent solution and the final rinsate will be analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If any volatile organic compounds are present, the washing and rinsing must be repeated until they are no longer detectable or to levels agreed upon with the EID. If any cracks are present soil samples must be collected from beneath the cracks and analyzed for volatile organic compounds. If contamination is present, a workplan must be developed to determine the extent of contamination and proper remedial action. Any other wastes generated in the closure process will be reclaimed or properly disposed of.

G.4 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used ~~mineral spirits~~ solvents to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, the sediment in the dumpsters will be removed and drummed, labeled, and manifested and then shipped to a reclaimer.

The dumpster and the dock area will be thoroughly rinsed with a detergent solution. The rinsate is discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described earlier. The final rinsate must be analyzed for volatile organic compounds. If any are present above detection levels, the washing and rinsing must be repeated until they are no longer detectable. The clean dumpster and dock structure will be reused by Safety-Kleen or scrapped.

G.5 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Safety-Kleen will notify the Environmental Improvement Division (EID) at least 45 days in advance of known closure. Closure activities will begin within 30 days of receipt of the known last volume of hazardous waste. Within 90 days of receiving the known last volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Mexico Health and Environment Dept. may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

- a. the facility has the capacity to receive additional wastes;
- b. there is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or
- c. closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

When closure is completed, Safety-Kleen shall submit to the New Mexico Health and Environment Dept. certification, both by the operator and by an independent registered professional engineer, that the facility has been closed in accordance with the approved closure plan.

ATTACHMENT G - 1

ESTIMATED CLOSURE COSTS

FARMINGTON, NEW MEXICO FACILITY
CLOSURE COST ESTIMATE

1. TANK CLOSURE - Open, remove contents of, clean, remove, and dispose of a 12,000-gallon aboveground storage tank.

Phase I - Remove Contents and Clean

1. Ship contents to a reclaimer.

Crew:

2 Truck Dr. \$17.56/hr. x 8 hrs. = \$ 281.28

2 Trucks \$500 lump sum 500.00

Tank size = 12,000 gal. - 7,500 gal/truck = 2 trucks

2 trucks x 300 miles x 1.75/mile = 1,050.00

Reclamation costs (\$0.30/gal.) 3,600.00

2. Squeegee Clean Tank

Crew:

1 Foreman \$18.30/hr. x 24 hrs. = 439.20

1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay)
x 24 hrs. = 480.00

3. Use of high pressure water for two days 800.00

4. Disposal and transportation of Wash Water
(1,200 gallons @ \$0.70/gallon) = 840.00

5. Transportation of wastewater
300 miles x \$1.75/mile = 525.00

6. Test final rinsate (2 samples) 2,000.00

Total Phase I = \$10,515.48

Phase II - Remove and Dispose of Tank

1. Disconnect and Remove Appurtenant Equipment

Crew:

1 Foreman \$18.30/hr. x 8 hrs. = \$ 146.40

2 Laborers \$17.00/hr. x 8 hrs. = 272.00

2. CLOSURE OF DRUM STORAGE AREA - Remove and return drums to a reclaimer, clean the drum storage areas, and dispose of wash water generated.

a.	2 Truck Dr. \$17.56/hr. x 8 hrs.	\$ 280.96
	2 Trucks - \$ 500 lump sum	500.00
	Hauling: 2 loads x 300 miles x \$1.75/mile =	1,050.00
b.	Clean drum storage areas	
	Crew:	
	1 Foreman \$18.30/hr. x 10 hrs. =	183.00
	1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay) x 20 hrs. =	200.00
c.	Dispose of wash water	
	700 gallons x \$0.70/gallon =	490.00
d.	Dispose of used solvents -	
	180 16-gallon drums x \$30/drum =	5,400.00
e.	Testing rinsate for contamination	
	2 samples x \$1,000.00 each	<u>2,000.00</u>
	Total Drum Storage Area Closure Cost	= \$ 13,074.00

3. CLOSURE OF RETURN AND FILL STATION - Remove, package and dispose of sediment, clean the dumpster and dock area, remove dumpster and dock structure for reuse or scrap.

a.	1 Truck @ \$250 lump sum each	\$ 250.00
	Hauling Cost = 300 miles x \$1.75/mile	525.00
	1 Truck Dr. \$17.56/hr. x 8 hrs.	140.48
	Crew:	
	1 Foreman \$18.30/hr. x 8 hrs	146.40
	1 Laborer (17.00/hr. & \$3.00/hr. hazard pay) x 8 hrs. =	160.00
b.	Clean Dumpster and Dock Areas	
	Crew:	
	1 Foreman \$18.30/hr. x 8 hrs. =	146.40
	1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay) x 8 hrs. =	160.00
	Use of high pressure water for one day =	400.00

ATTACHMENT H

FINANCIAL LIABILITY DOCUMENTS



Letter From Chief Financial Officer

Mr. Edward Horst
New Mexico Environmental Improvement Division
Hazardous Waste Bureau
1190 St. Francis Drive
Santa Fe, NM 87503

Dear Mr. Morgan:

I am the chief financial officer of Safety-Kleen Corp., 1000 North Randall Road, Elgin, Illinois, 60123. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and post-closure care is demonstrated through the financial test specified in New Mexico Hazardous Waste Management Regulations, Part 206.C.3 and 206.D.3. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: total per attached listing - closure \$115,500; post-closure \$0.
2. This firm guarantees, through the corporate guarantee specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3, the closure and post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure or post-closure care so guaranteed are shown for each facility: None.
3. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care is not demonstrated either to the New Mexico Environmental Improvement Division through the financial test or any other financial assurance mechanism specified in New Mexico Hazardous Waste Management Regulations, Part II 206.C.3 and 206.D.3. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: total per attached listing - closure \$26,925,886; post-closure \$15,405,628.

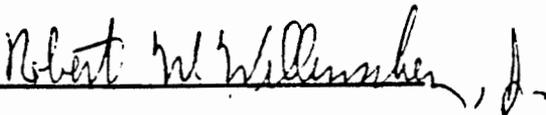
This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the Saturday closest to December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended January 1, 1994.

Alternative II

- | | | | | |
|-----|--|---------------------------|------------|-----------|
| 1. | Sum of current closure and post-closure cost estimates | \$ 42,447,014 | | |
| 2. | Current bond rating of most recent issuance of this firm and name of rating service | BBB +, Standard and Poors | | |
| 3. | Date of issuance of bond | September 15, 1989 | | |
| 4. | Date of maturity of bond | September 15, 1999 | | |
| *5. | Tangible net worth | \$ 255,950,000 | | |
| *6. | Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) | \$ 770,389,000 | | |
| | | | <u>YES</u> | <u>NO</u> |
| 7. | Is line 5 at least \$10 million? | | X | |
| 8. | Is line 5 at least 6 times line 1? | | X | |
| *9. | Are at least 90% of firm's assets located in the U.S.? If not, complete line 10. | | | X |
| 10. | Is line 6 at least 6 times line 1? | | X | |

I hereby certify that the wording of this letter is identical to the wording specified in New Mexico hazardous Waste Management Regulations, Part II 206.D.3.J.(6) as such regulations were constituted on the date shown immediately below.



Robert W. Willmschen, Jr.
Senior Vice President Finance and Secretary

March 15, 1994

cc: Stella Matoya

STATE OF NEW MEXICO

Albuquerque 2720 Girard NE NMD 000804294 (\$ 68,200) (0)
7-008-01 Albuquerque, NM 87107

Farmington 4200A Hawkins Road NMD 980698849 (\$ 47,300) (0)
7-008-21 Farmington, NM 87401

NEW MEXICO TOTALS: closure: post-closure:
(\$ 115,500) (0)

	<u>closure</u>	<u>post-closure</u>
PARAGRAPH #1 TOTALS	\$115,500	\$0

STATE OF ALABAMA

Dolomite 3-019-01	1002 Hoke Avenue Dolomite, AL 35061	ALD 077640001	(\$ 54,000)	(0)
Gurley 3-019-02	201 Section Line St Gurley, AL 35748	ALD 000776807	(\$ 28,200)	(\$ 41,700)
Huntsville 3-019-02	2221 Highway 72 East Huntsville, AL 35811	ALD 981028798	(\$244,500)	(0)
Montgomery 3-019-21	4815 N. Birmingham Montgomery, AL 36308	ALD 000653303	(\$144,700)	(\$295,100)
Whistler 6-133-01	3023 Dials Street Whistler, AL 36612	ALD 071951628	(\$171,300)	(\$373,500)

ALABAMA TOTALS:

closure:	post-closure:
(\$642,700)	(\$710,300)

STATE OF ARIZONA

Phoenix 7-142-01	4401 E. University Phoenix, AZ 85034	AZD 089308803	\$ 29,800	\$180,100
Chandler 7-142-01	Lot 42, Beck Avenue Williams Field Rd. Ind. Park Chandler, AZ 05224	AZD 981969504	\$ 54,000	0
Tucson 7-142-02	4161 E. Tennessee Tucson, AZ 85714	AZD 980892897	\$ 64,700	0

ARIZONA TOTALS:

closure:	post-closure:
(\$148,500)	(\$180,100)

STATE OF ARKANSAS

Little Rock 6-086-01	11727 Arch Street Pike Little Rock, AR 72206	ARD 054575238	(\$ 84,600)	(0)
Fort Smith 6-063-01	2511 Johnson Street Fort Smith, AR 72904	ARD 000709733	(\$ 65,800)	(0)
West Memphis 6-094-01	309 Mound City Road West Memphis, AZ 72301	ARD 056855232	(\$ 52,000)	(0)

ARKANSAS TOTALS:

closure: post-closure:
(\$ 202,400) (0)

STATE OF COLORADO

Commerce City 6-052-01	4980 Locust Street Commerce City, CO 80022	COD 000716613	(\$ 53,300)	(0)
Denver	1345 Bayoud Avenue Denver, CO 80223	COD 980954101	(\$350,000)	(0)
Englewood 6-052-02	2801 S. Tejon Englewood, CO 80110	COD 000716621	(\$ 59,000)	(0)
Grand Junction 6-052-01	368 Bonny Grand Junction, CO 81501	COD 090010851	(\$ 49,800)	(0)
Pueblo 6-052-04	2841 East Fourth Street Pueblo, CO 81001	COD 000716639	(\$ 50,600)	(0)

COLORADO TOTALS:

closure:

**post-
closure**

(\$562,700)

(0)

STATE OF CONNECTICUT

Branford 2-112-01	11 Tipping Drive Branford, CT 06405	CTD 980667927	(\$115,600)	(0)
West Hartford 2-070-01	24 Brixton Street West Hartford, CT 06110	CTD 000845982	(\$ 61,800)	(\$ 42,100)
Plainfield	39 Community Ave. Extension Plainfield, CT 06374	CTD 001156009	(\$ 82,600)	(0)
CONNECTICUT TOTALS:			closure:	post-closure:
			(\$260,000)	(\$ 42,100)

STATE OF FLORIDA

Casselberry 3-130-01	505 Plumosa Drive Altamonte Springs, FL 32701	FLD 097837983	(\$166,100)	(\$502,600)
Sanford 3-130-01	600 Central Park Drive Sanford, FL 32771	FLD 984171165	(\$ 49,300)	(0)
Delray Beach 3-097-01	1855 SW 4th Ave., Bldg. B, Bay 30 Delray Beach, FL 33444	FLD 000776757	(\$316,400)	(\$1,007,000)
Boynton Beach 3-097-01	5610 Alpha Drive Boynton, Beach, FL 33426	FLD 984167791	(\$ 41,700)	(0)
Orange Park 3-079-01	161 Industrial Loop South Orange Park, FL 32073	FLD 980847214	(\$ 52,400)	(0)
Miami 3-097-02	7875 NW 54th Street Miami, FL 33166	FLD 980840086	(\$ 61,800)	(\$1,507,000)
Medley 3-097-02	8755 95th Street Medley, FL 33178	FLD 984171694	(\$ 60,600)	(0)
Port Charlotte 3-163-02	19200 Peachland Blvd. Port Charlotte, FL 33949	FLD 000776716	(\$ 26,100)	(0)
Tallahassee 3-079-02	3082 West Tharpe Street Tallahassee, FL 32303	FLD 000776773	(\$ 81,300)	(\$546,700)
Tallahassee 3-079-02	4426 Entrepot Blvd. Tallahassee, FL 32310	FLD 982133159	(\$ 51,500)	(0)
Tampa 3-163-01	4701 North Manhattan Tampa, FL 33614	FLD 049557408	(\$257,800)	(\$815,500)
Tampa 3-163-01	5309 24th Avenue South Tampa, FL 33619	FLD 980847271	(\$143,500)	(0)

FLORIDA TOTALS:

closure:	post-closure:
(\$1,308,500)	(\$4,378,800)

STATE OF GEORGIA
Corrective Action Cost Estimate

Norcross 3-013-02	4800 S. Old Peachtree Road Norcross, Georgia 30071	GAD980842777	(\$339,200)
Columbus 3-106-01	5920 Coca Cola Blvd. Columbus, Georgia 31909	GAD000823096	(\$ 25,200)

CORRECTIVE ACTION TOTALS: (\$364,400)

STATE OF GEORGIA

Columbus 3-106-01	5920 Coca Cola Blvd. Columbus, GA 31909	GAD000823096	(\$ 31,300)	(0)
Garden City 3-179-01	5217 Augusta Road P. O. Box 7036 Garden City, GA 31408	GAD000776781	(\$ 33,000)	(0)
Hapeville 3-013-01	3440 Lang Avenue Hapeville, GA 30354	GAD000823070	(\$112,000)	(\$546,800)
Morrow 3-013-01	7027 Commercial Drive Morrow, GA 30260	GAD981265424	(\$ 50,100)	(0)
Macon 3-106-21	6850 Hawkinsville Road Macon, GA 31207	GAD980709257	(\$ 29,400)	(0)
Norcross 3-013-02	4800 S. Old Peachtree Rd Norcross, GA 30071	GAD980842777	(\$ 63,300)	(0)
Ringgold 3-019-22	RR #5, Dietz Road Ringgold, GA 30736	GAD980842835	(\$ 15,300)	(0)

GEORGIA TOTALS:

	closure:	post- closure:
	(\$334,400)	(\$546,800)

STATE OF ILLINOIS

Caseyville 5-160-02	20 Tucker Drive Caseyville, IL 62232	ILD 981097819	(\$ 285,500)	(0)	(\$ 285,500)
Chicago Recycle Center	1445 W. 42nd Street Chicago, IL 60609	ILD 005450697	(\$2,978,500)	(\$ 145,700)	(\$3,124,200)
Franklin Park 5-034-04	450 Domenic Court Franklin Park, IL 60131	ILD 000665869	(\$ 54,700)	(\$ 24,400)	(\$ 79,100)
Mokena 5-034-05	9631 West 194th Place Mokena, IL 60448	ILD 000665851	(\$ 92,800)	(\$ 24,400)	(\$ 117,200)
Pekin 5-136-01	RR #3 Pekin, IL 61554	ILD 093862811	(\$ 151,600)	(\$ 346,500)	(\$ 498,100)
Schaumburg 5-034-01	728 Morse Avenue Schaumburg, IL 60193	ILD 079749073	(\$ 314,800)	(273,300)	(\$ 588,100)
Urbana 5-033-01	500 Anthony Drive Urbana, IL 61801	ILD 981088388	(\$ 111,500)	(\$ 24,400)	(\$ 135,900)
Doton Recycle Center	633 E. 138th Street P. O. Box 100 Doton, IL 60419	ILD 980613913	(\$4,117,000)	(0)	(\$4,117,000)

ILLINOIS TOTALS:

**closure: post-closure: closure and
post-closure:**

(\$10,831,400) (\$3,710,000)(\$14,541,400)

STATE OF INDIANA

Evansville 5-060-01	4417 St. Joe Street Evansville, IN 47712	IND 000815894	(\$ 57,400)	(0)
Fort Wayne 5-068-01	2112 Production Rd. Fort Wayne, IN 46808	IND 000715466	(\$ 63,100)	(0)
Indianapolis 4-076-02	8418-26 Brookville Rd. Indianapolis, IN 46239	IND 000815886	(\$ 283,400)	(0)
Greenwood 4-076-02	800 Park Drive Greenwood, IN 46142	IND 984874776	(\$ 55,000)	(0)
Portage 5-034-06	6050 Eagle Drive Portage, IN 46368	IND 000714428	(\$ 17,500)	(0)
South Bend 5-082-01	2217 Western Avenue South Bend, IN 46628	IND 000715474	(\$ 176,100)	(0)

INDIANA TOTALS:

closure:

post-closure:

(\$ 652,500)

(0)

STATE OF INDIANA

Safety-Kleen Oil
Recovery Company
(SKORC)

601 Riley Road
E. Chicago, IN 46312

IND 077042034 (\$ 901,100) (0)

INDIANA TOTALS:

closure: post-closure:

(\$ 901,100) (0)

STATE OF KANSAS

Dodge City 6-195-21	600 East Trail Dodge City, KS 67801	KSD 980686844	(\$ 75,000)	(0)
Wichita 6-195-01	1311 South Anna Wichita, KS 67209	KSD 000809723	(\$ 155,000)	(0)
Edwardsville 5-085-01	9317 Woodend Road Edwardsville, KS 66022	KSD 980973515	(\$ 60,000)	(0)
Bonner Springs 5-085-01	11565 K 32 Highway Bonner Springs, KS	KSD 000687681	(0)	(\$1,097,000)
KANSAS TOTALS:			closure:	post-closure:
			(\$ 290,000)	(\$1,097,000)

STATE OF KENTUCKY

Ashland 4-075-01	1592 Wolohan Drive Ashland, KY 41101	KYD 000776724	(\$ 153,800)	(\$1,281,300)
Ashland 4-075-01	12092 Virginia Ave. Ashland, KY 41101	KYD 981027451	(\$ 153,800)	(0)
Lexington 4-090-01	550 Blue Sky Pkwy Lexington, KY 40509	KYD 981027469	(\$ 56,500)	(0)
Louisville 4-091-01	751 Grade Lane Louisville, KY 40213	KYD 091514653	(\$ 153,800)	(\$ 266,500)
New Castle (RC)	State Highway 146 New Castle, KY 40050	KYD 053348108	(\$ 423,500)	(\$ 100,600)

KENTUCKY TOTALS:	closure:	post-closure:
	(\$ 941,400)	(\$1,648,400)

STATE OF LOUISIANA

Pineville 6-073-04	4200 Shreveport Highway Pineville, LA 71360	LAD 000757708	(\$ 150,000)	(0)
Pineville 6-073-04	518 Ryder Drive Pineville, LA 71360	LAD 981057441	(\$ 92,200)	(0)
Kenner 6-115-01	14 26th Street Kenner, LA 70062	LAD 089841902	(\$ 66,800)	(0)
Kenner 6-115-01	Tyler Avenue Kenner, LA 70062	LAD 985171024	(\$ 111,100)	(0)

LOUISIANA TOTALS: closure: post-closure:
(\$ 420,100) (0)

STATE OF MAINE

Leeds	Route 202, RFD 3, Box 1990	MED 980667810	(\$ 52,300)	(0)
2-011-01	Leeds, Maine 04263			

TOTALS FOR MAINE:	closure:	post-closure:
	(\$ 52,300)	(0)

STATE OF MINNESOTA

Cloquet 5-050-01	1302 18th Street Cloquet, MN 55720	MND 000686170	(\$ 25,400)	(0)
St. Paul 5-103-01	180 Ryan Drive St. Paul, MN 55117	MND 000823823	(\$ 1,000)	(0)
Blaine 5-103-01	Lot 1 & Hokanson Industrial Park 9261 Isanti Street NE Blaine, MN 55449	MND 981953045	(\$ 50,800)	(0)
Eagan 5-103-02	3227 Terminal Drive Eagan, MN 55121	MND 981097884	(\$ 65,100)	(0)
Burnsville 5-103-02	1401 Cliff Road Burnsville, MN 55337	MND 000686188	(\$ 42,700)	(0)

MINNESOTA TOTALS:	closure:	post-closure:
	(\$ 185,000)	(0)

STATE OF MISSISSIPPI

Jackson 6-078-01	120 Richardson Drive Jackson, MS 39209	MSD 000776765	(\$ 51,600)	(0)
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Southaven 6-094-01	7217 Airways Avenue Southaven, MS 38671	MSD 981030894	(\$ 85,500)	(0)
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MISSISSIPPI TOTALS:	closure:	post-closure:
	(\$ 137,100)	(0)

STATE OF NEBRASKA

Gering 6-052-03	RR 1, Box 15E Gering, NE 69341	NED 000687178	(\$ 35,300)	(0)
Grand Island 5-065-01	Highway 281 South Grand Island, NE 68801	NED 000687186	(\$ 108,400)	(\$ 745,000)
Grand Island 5-065-01	2700 West 2nd Avenue Grand Island, NE 68801	NED 053316535	(\$ 54,000)	(0)
Omaha 5-127-01	14564 Grover Street Omaha, NE 68144	NED 020185138	(\$ 41,300)	(0)
Omaha 5-127-01	Lamont & 139th Street Omaha, NE 68144	NED 981495724	(\$ 297,700)	(0)

NEBRASKA TOTALS:

closure:	post-closure:
(\$ 536,700)	(\$ 745,000)

STATE OF NEVADA

North Las Vegas 1655 Stocker Street NVD 007096761 (\$ 54,000) (0)
7-087-01 North Las Vegas, NV 89030

TOTALS FOR NEVADA closure: post-closure:
(\$ 54,000) (0)

STATE OF NORTH CAROLINA

Charlotte 3-031-01	2320 Yadkin Avenue Charlotte, NC 28205	NCD 079060059	(\$ 87,500)	(0)
Raleigh 3-171-01	Sommerville Industrial Bldg. Route 3, 6225 Old State Road Raleigh, NC 27603	NCD 000776740	(\$ 81,500)	(0)
High Point 3-064-01	High Point Building 6182 Old Mendenhall Road Archdale, NC 27263	NCD 077840148	(\$ 114,700)	(0)
St. Pauls 3-031-02	Highway 301 North St. Pauls, NC 28384	NCD 980846935	(\$ 78,300)	(0)

NORTH CAROLINA TOTALS:

closure:	Post- closure:
(\$ 362,000)	(0)

STATE OF NORTH DAKOTA

Fargo 1537-1/2 First Avenue South NDD 000716738 (\$ 29,700) (0)
1-183-03 Fargo, ND 58103

Bismarck 3704 Saratoga NDD 980957070 (\$ 29,300) (0)
1-183-23 Bismarck, ND 58501

NORTH DAKOTA TOTALS: closure: post-closure:
(\$ 59,000) (0)

STATE OF OKLAHOMA

Wheatland 7825 State Highway 152 OKD 980878474 (\$ 48,200) (0)
6-124-01 Wheatland, OK 73097-0128

Tulsa 16319 East Marshall Street OKD 000763821 (\$ 94,300) (0)
6-193-01 Tulsa, OK 74116

OKLAHOMA TOTALS: closure: post-closure:
(\$ 142,500) (0)

STATE OF OREGON

Springfield 7-054-01	550 Shelley Street Space C and D Springfield, OR 97477	ORD 000712067	(\$ 15,400)	(0)
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Clackamas 7-148-01	11843 SE Highway 212 Clackamas, OR 97015	ORD 092895481	(\$ 140,600)	(0)
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Clackamas 7-148-01) 0-007-89	16540 SE 130th Street Clackamas, OR 97015	ORD 981766124	(\$ 143,000)	(0)
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OREGON TOTALS:	closure:	post-closure:
	(\$ 299,000)	(0)

COMMONWEALTH OF PUERTO RICO

Safety-Keen Envirosystems Company of Puerto Rico Inc.	KM 51 Hwy. 2 P.O. Box 1098 Manati, PR 00701	PRD 090399718	(\$ 355,300)	(0)
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Safety-Keen Envirosystems of Puerto Rico, Inc.	KM 267, Hwy. 2 Dorado, PR 00646	PRD 981182421	(\$ 94,200)	(0)
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PUERTO RICO TOTALS:

closure:

post-closure:

(\$ 449,500)

(0)

STATE OF SOUTH CAROLINA

Greer 3-066-01	2818 Old Woodruff Rd Greer, SC 29651	SCD 981031040	(\$ 74,500)	(0)
Lexington RC/3-043-01	Route 5, Box 319A Lexington, SC 29072	SCD 077995488	(\$ 439,600)	(\$ 45,000)
Florence 3-043-21	Highway 301 South Florence, SC 29501	SCD 980842785	(\$ 54,400)	(0)
Summerville 3-179-21	2500 Highway 17A South Summerville, SC 29483	SCD 980709299	(\$ 49,000)	(\$ 430,000)
Holly Hill (RC)	Rt. 2, Box 418 Hwy. 453 South Holly Hill, SC 29059	SCD 003368891	(\$ 390,500)	(0)

SOUTH CAROLINA TOTALS: closure: post-closure:
(\$1,008,000) (\$ 475,000)

STATE OF SOUTH DAKOTA

Sioux Falls 1-183-05	2000 North Westport Avenue Sioux Falls, SD 57107	SDD 000716696	(\$ 40,100)	(0)
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SOUTH DAKOTA TOTALS:	closure:	post-closure:
	(\$ 40,100)	(0)

STATE OF TENNESSEE

Dyersburg 6-051-01	2010 Brewer Road Dyersburg, TN 38024	TND 981 027 410	(\$ 75,800)	(0)
Knoxville 3-080-01	826 Stewart Knoxville, TN 37917	TND 079 025 698	(\$ 72,300)	(0)
Knoxville 3-080-01	6617 Pleasant Ridge Rd. Knoxville, TN 37921	TND 987 777 695	(\$ 78,600)	(0)
Nashville 3-109-01	215 Whitsett Road Nashville, TN 37210	TND 981 474 125	(\$ 80,800)	(\$ 46,500)

TENNESSEE TOTALS:

closure:

post closure:

(\$ 307,500)

(\$ 46,500)

STATE OF TEXAS

Ablene 6-002-01	4234 Oil Belt Lane Ablene, TX 79605	TXD 062287883	(\$ 74,700)	(\$ 23,600)
Amarillo 6-009-02	3811 Interstate 40 East Amarillo, TX 79104	TXD 000747410	(\$ 77,000)	(\$ 23,600)
Corpus Christi 6-048-01	3820 Bratton Road Corpus Christi, TX 78415	TXD 000747402	(\$ 49,000)	(0)
Denton R/C 0-006-18	1722 Cooper Creek Road Denton, TX 76201	TXD 077603371	(\$ 987,500)	(\$ 102,000)
El Paso 6-056-01	900A Hawkins Blvd. El Paso, TX 79905	TXD 000747394	(\$ 69,800)	(0)
Ft. Worth 6-049-02	6529 Midway Road Haltom City, TX 76117	TXD 981053416	(\$ 57,000)	(0)
Irving 6-049-01	2130A East Grauwylar Irving, TX 75061	TXD 981052061	(\$ 121,700)	(0)
Longview 6-194-01	202 Michael Place Longview, TX 75602	TXD 000747378	(\$ 47,700)	(0)
Lubbock 6-009-01	1 Mile East of Loop 289 On Highway 62 & 82 Lubbock, TX 79408	TXD 000747436	(\$ 40,100)	(0)
McAllen 6-048-02	1/4 Mile North Jackson Road 1/8 Mile West International McAllen, TX 78501	TXD 083145656	(\$ 53,000)	(0)
Midland 6-002-02	10043-B County Rd. 125-W Midland, TX 79711	TXD 981054617	(\$ 77,800)	(0)
Missouri City 6-073-02	1580 Industrial Road Missouri City, TX 77459	TXD 010803203	(\$ 211,800)	(\$ 723,000)
Orange 6-073-03	3304 Womack Road Orange, TX 77630	TXD 061290276	(\$ 48,800)	(0)
Pasadena 6-073-01	3333 Federal Road Pasadena, TX 77504	TXD 000747386	(\$ 82,800)	(\$ 41,600)
San Antonio 6-169-01	5243 Sinclair Road San Antonio, TX 78222	TXD 000729400	(\$ 172,800)	(0)

Waco 6-049-03	22006 Woodway Dr. Highway 84 West Waco, TX 76712	TXD 980876015	(\$ 43,200)	(0)
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Wichita Falls 6-049-04	1606 Missile Road Wichita Falls, TX 76306	TXD 000747428	(\$ 56,300)	(0)
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TEXAS TOTALS:	closure:	post-closure:
	(\$2,271,000)	(\$ 913,800)

STATE OF UTAH

Salt Lake City 394 Ironwood Drive UTD 052430741 (\$ 53,500) (0)
7-166-01 Salt Lake City, UT 84115

Salt Lake City 1066 Pioneer Road UTD 980957088 (\$ 54,500) (0)
7-166-01 Salt Lake City, UT 84104

UTAH TOTALS: closure; post-closure:
(\$ 108,000) (0)

STATE OF VERMONT

Barre	23 West Second Street	VTD 000791699	(\$ 198,500)	(0)
2-105-01	Barre, Vermont 05641			

VERMONT TOTALS:	closure:	post closure:
	(\$ 198,500)	(0)

STATE OF VIRGINIA

Bristol 3-026-01	2146 King Mill Road Bristol, VA 24201	VAD 000 737 338	(\$ 434,100)	(0)
Chesapeake 3-121-01	4545 Bainbridge Blvd. Chesapeake, VA 23320	VAD 000 737 346	(\$ 125,500)	(0)
Chester 3-154-01	1200 West 100 Road Chester, VA 23831	VAD 981 043 011	(\$ 79,800)	(0)
Vinton 3-155-01	Route 24 East of Vinton at O'Neal Drive Vinton, VA 24179	VAD 000 737 361	(\$ 124,700)	(0)

VIRGINIA TOTALS:	closure:	post-closure:
	(\$ 764,100)	(0)

STATE OF WASHINGTON

Auburn 1-181-01	3210 C Street NE Unit G Auburn, WA 98002	WAD 000712059	(\$ 42,000)	(0)
Lynnwood 7-092-01	6303 212th Street SW Suite C Lynnwood, WA 98036	WAD 000712042	(\$ 42,500)	(0)
Pasco 1-183-02	814 E. Ainsworth Pasco, WA 99301	WAD 980978746	(\$ 36,500)	(0)
Spokane 1-183-01	9516 East Montgomery Unit 16 Spokane, WA 99206	WAD 000712034	(\$ 30,500)	(0)

WASHINGTON TOTALS:	closure;	post-closure:
	(\$ 151,500)	(0)

	<u>closure</u>	<u>post-closure</u>
PARAGRAPH #3 TOTALS	\$26,925,886	\$15,405,628

ARTHUR ANDERSEN & CO.

REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS

To the Board of Directors and
Management of Safety-Kleen Corp.:

We have audited, in accordance with generally accepted auditing standards, the consolidated financial statements of Safety-Kleen Corp. (a Wisconsin corporation) and Subsidiaries (the "Company") for the fiscal years ended January 1, 1994 and January 2, 1993, and have issued our report thereon dated February 10, 1994 that included an explanatory paragraph with respect to the changes in the methods of accounting for postretirement benefits other than pensions and accounting for income taxes, effective December 29, 1991, as discussed in Notes 7 and 8 to those consolidated financial statements. We have not performed any auditing procedures since that date.

At your request, we have read the letter dated March 15, 1994, from your chief financial officer to the Environmental Protection Agency ("EPA") and compared the data therein that is specified as having been derived from the audited consolidated financial statements for the year ended January 1, 1994, referred to above, with the corresponding amounts in those financial statements. In connection with this procedure, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report is furnished solely for the use of the Company and the EPA and should not be used for any other purpose.

Chicago, Illinois,
March 15, 1994

Arthur Andersen & Co.

ARTHUR ANDERSEN & CO.

REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS

To the Board of Directors and
Shareholders of Safety-Kleen Corp.:

We have audited the accompanying consolidated balance sheets of Safety-Kleen Corp. (a Wisconsin corporation) and Subsidiaries as of January 1, 1994, and January 2, 1993, and the related consolidated statements of operations, shareholders' equity and cash flows for each of the three fiscal years in the period ended January 1, 1994. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Safety-Kleen Corp. and Subsidiaries as of January 1, 1994, and January 2, 1993, and the results of their operations and their cash flows for each of the three fiscal years in the period ended January 1, 1994, in conformity with generally accepted accounting principles.

As discussed in Notes 7 and 8 to the consolidated financial statements, effective December 29, 1991, the Company changed its methods of accounting for postretirement benefits other than pensions and income taxes.

Arthur Andersen & Co.

Chicago, Illinois,
February 10, 1994

ATTACHMENT I

PART A PERMIT APPLICATION

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

For EPA Regional Use Only		EPA									
		United States Environmental Protection Agency Washington, DC 20460									
		Hazardous Waste Permit Application									
		Part A									
Date Received		<i>(Read the instructions before starting)</i>									
Month	Day	Year									
I. Installation's EPA ID Number <i>(Mark 'X' in the appropriate box)</i>											
<input type="checkbox"/> A. First Part A Submission			<input checked="" type="checkbox"/> B. Part A Amendment #			4/30/1996					
C. EPA ID Number						D. Secondary ID Number <i>(if applicable)</i>					
NMD980698849											
II. Name of Facility											
SAFETY-KLEEN CORP.											
III. Facility Location <i>(Physical address not P.O. Box or Route Number)</i>											
A. Street											
4210A HAWKINS ROAD											
Street <i>(continued)</i>											
City or Town						State	Zip Code				
FARMINGTON						NM	87401 -				
County Code <i>(if known)</i>		County Name									
		SAN JUAN									
B. Land Type		C. Geographic Location					D. Facility Existence Date				
<i>(Enter Code)</i>		LATITUDE <i>(degrees, minutes & seconds)</i>		LONGITUDE <i>(degrees, minutes & seconds)</i>			Month	Day	Year		
		36	44	20N	108	14	11W	01	01	1981	
IV. Facility Mailing Address											
Street or P.O. Box											
4210A HAWKINS ROAD											
City or Town						State	Zip Code				
FARMINGTON						NM	87401 -				
V. Facility Contact <i>(Person to be contacted regarding waste activities at facility)</i>											
Name <i>(last)</i>					Name <i>(first)</i>						
LEUTNER					DIANA						
Job Title					Phone Number <i>(area code and number)</i>						
REGIONAL EHS MANAGER					303 - 377 - 8424						
VI. Facility Contact Address <i>(See instructions)</i>											
A. Contact Address				B. Street or P.O. Box							
Location	Mailing	Other									
X			3333 QUEBEC ST., PENTHOUSE A								
City or Town						State	Zip Code				
DENVER						CO	80207 -				

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1) Secondary ID Number (enter from page 1)

NMD980698849

XI. Nature of Business (provide a brief description)

This location is primarily a local sales/service office and warehouse for Safety-Kleen products consisting of small parts cleaning equipment, solvent and allied products such as hand cleaner, parts washing brushes, etc. Safety-Kleen collects used solvents from the customer for temporary storage at this facility. Once a sufficient quantity of materials is collected, the materials are moved off-site in a semi trailer to a Safety-Kleen recycling center.

XII. Process - Codes and Design Capacities

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04, and X99), describe the process (including its design capacity) in the space provided in item XIII.

B. PROCESS DESIGN CAPACITY - For each code entered in Column A, enter the capacity of the process.

1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Disposal Injection Well	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
D80	Landfill	Acre-feet of Hectare-meter	T88	Titanium Dioxide Chloride Process	
D81	Land Application	Acres of Hectares	T89	Oxidation Reactor	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T90	Methane Reforming Furnace	
D83	Surface Impoundment	Gallons or Liters	T91	Pulping Liquor Recovery Furnace	
D99	Other Disposal	Any unit of measure listed below	T92	Combustion Device Used in the Recovery of Sulfur Values From Spent Sulfuric Acid	
S01	Storage Container (barrel, drum, etc.)	Gallons or Liters	T93	Halogen Acid Furnaces	
S02	Tank	Gallons or Liters	T94	Other Industrial Furnaces Listed in 40 CFR §260.10	
S03	Waste Pile	Gallons or Liters	X01	Containment	
S04	Surface Impoundment	Gallons or Liters	X02	Building-Treatment	
S05	Containment	Cubic Yards or Cubic Meters	X03	Miscellaneous (Subpart X): Open Burning/Open Incineration	
S06	Building-Storage	Cubic Yards or Cubic Meters	X04	Mechanical Processing	
S99	Other Storage	Any Unit of Measure Listed Below	X99	Thermal Unit	
T01	Treatment Tank	Gallons Per Day or Liters Per Day		Geologic Repository	
T02	Surface Impoundment	Gallons Per Day or Liters Per Day		Other Subpart X	
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or BTU's Per Hour			
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T80	Boiler	Gallons or Liters			
T81	Cement Kiln	Gallons Per Day; Liters Per Day			
T82	Lime Kiln	Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T83	Aggregate Kiln	Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T84	Phosphate Kiln	Pounds Per Hour; Short Tons Per Day; or Btu's Per Hour			
T85	Coke Oven	Pounds Per Hour; Short Tons Per Day; or Btu's Per Hour			
T86	Blast Furnace	Btu's Per Hour			

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liter Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
BTU'S PER HOUR	K

Please print or type with ELLI E type (12 characters per inch) in the unshaded areas only

A.I.D. Number (enter from page 1) NMD980698849	Secondary ID Number (enter from page 1)
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XII. Process - Codes and Design Capacities (continued)										
EXAMPLES FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank which can hold 533,788 gallons.										
Line Number	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY			C. Process Total Number Of Units	For Official Use Only	
					1. Amount (Specify)	2. Unit Of Measure <small>(Enter Code)</small>				
X 1	S	0	2		533 . 788	G	001			
1	S	0	1		3,820 .	G	001			
2	S	0	2		12,000 .	G	001			
3										
4										
5										
6										
7										
8										
9										
1 0										
1 1										
1 2										
3										

NOTE: If you need to list more than 1 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XII.

XIII. Other Processes (Follow instructions from Item XII for D99, S99, T04 and X99 process codes)										
Line Number <small>(Enter its in seq w/ XII)</small>	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY			C. Process Total Number Of Units	D. Description of Process	
					1. Amount (Specify)	2. Unit of Measure <small>(Enter Code)</small>				
X 1	T	0	4					In-situ Vitrification		
1										
2										
3										
4										

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Form Approved. OMB No. 2050-0034 Expires 9-30-96
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
NMD980698849	
Process - Codes and Design Capacities (continued)	

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EPA ID Number (enter from page 1) Secondary ID Number (enter from page 1)

NMD980698849

Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic constituents of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic constituent entered in column A estimate the total annual quantity of all the non-listed wastes that will be handled which possess that characteristic or constituent.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XIV A on page 2 to indicate how the waste will be stored, treated, either disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic constituent entered in column A, select the code(s) from the list of process codes contained in Item XIV A on page 2 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic constituent.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "00" in the extreme right box of Item XIV-A(1).
- Enter in the space provided on page 2, Item XIV-A, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (X-1).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be in the form as follows:

- Select one of the EPA hazardous waste numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA hazardous waste number that can be used to describe the waste in column A(1) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA hazardous waste number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are combustible only and there will be an estimated 400 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS							
				(1) PROCESS CODES (Enter Code)			(2) PROCESS DESCRIPTION (If a code is not entered in D(1))				
X-1	K 0 5 4	900	P	T	0	3	D	8	0		
X-2	D 0 0 2	400	P	T	0	3	D	8	0		
X-3	D 0 0 1	100	P	T	0	3	D	8	0		
X-4	D 0 0 2										Included with above

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EPA I.D. Number (enter from page 1)				Secondary ID Number (enter from page 1)											
NMD980698849															
XIV. Description of Hazardous Wastes (continued)															
Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES											
				(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION (if a code is not entered in D(1))					
1	F002	25	T	S	0	1									
2	F004													Included with above	
3	D004													Included with above	
4	D005													Included with above	
5	D006													Included with above	
6	D007													Included with above	
7	D008													Included with above	
8	D009													Included with above	
9	D010													Included with above	
10	D011													Included with above	
11	D018													Included with above	
12	D019													Included with above	
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29	D038													Included with above	
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31	D040													Included with above	
32	D041													Included with above	
33	D042													Included with above	

Form 8700-23 (Rev. 11-30-93) Previous edition is obsolete.

Please print or type with ELIIE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1) NMD980698849	Secondary ID Number (enter from page 1)
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Line Number		A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES											
					(1) PROCESS CODES (Enter code)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))						
3	4	D043														Included with above
3	5	D001	125	T	S	0	2	S	0	1						
3	6	D004														Included with above
3	7	D005														Included with above
3	8	D006														Included with above
4	9	D007														Included with above
4	0	D008														Included with above
4	1	D009														Included with above
4	2	D010														Included with above
4	3	D011														Included with above
4	4	D018														Included with above
4	5	D019														Included with above
4	6	D021														Included with above
4	7	D022														Included with above
4	8	D023														Included with above
5	9	D024														Included with above
5	0	D025														Included with above
5	1	D026														Included with above
5	2	D027														Included with above
5	3	D028														Included with above
5	4	D029														Included with above
5	5	D030														Included with above
5	6	D032														Included with above
5	7	D033														Included with above
5	8	D034														Included with above
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6	0	D036														Included with above
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6	3	D039														Included with above
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6	5	D041														Included with above
6	6	D042														Included with above

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Please print or type with ELI E type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
NMD980698849	

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

NO CHANGE - SUBMITTED PREVIOUSLY

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

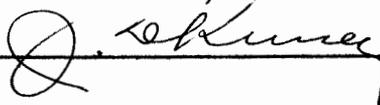
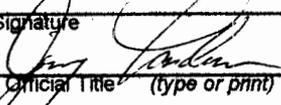
XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures, existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas (see instructions for more detail).

NO CHANGE - SUBMITTED PREVIOUSLY

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature 	Date Signed 5/17/96
Name and Official Title (type or print) J.D. KINSEY J.D. KINSEY	
Owner Signature 	Date Signed
Name and Official Title (type or print)	
Operator Signature 	Date Signed 5-15-96
Name and Official Title (type or print) JIMMY LANDERS, REGIONAL SALES MANAGER	
Operator Signature	Date Signed
Name and Official Title (type or print)	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

ATTACHMENT J

POLLUTION PREVENTION (WASTE MINIMIZATION) PLAN

(Attachment Added January 1996)

Safety-Kleen Corp.

Waste Minimization Program

March, 1996

FARMINGTON, NEW MEXICO SERVICE CENTER

EPA ID # N.M.D. 980698849

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Section 1.0

Introduction

Safety-Kleen's business is to facilitate the wise use and reuse of resources by providing quality recycling services. As part of Safety-Kleen's commitment to its customers and the environment, Safety-Kleen has established a Waste Minimization Program.

The goals of the program are:

- * To educate Safety-Kleen personnel about waste minimization opportunities.
- * To facilitate education of Safety-Kleen facility management about ways they can minimize waste generation.

Safety-Kleen has developed this program with U.S. Environmental Protection Agency guidance. It is designed to:

- * Help Safety-Kleen personnel identify mechanisms to minimize waste.
- * Provide Safety-Kleen management with information regarding the Company's responsibility to minimize waste.

1.1 A Phased Approach to a Waste Minimization Program

The following summarizes Safety-Kleen's phased approach to a Waste Minimization Program.

1. Educate employees about waste minimization (what it is and how to achieve it).
2. Train personnel to identify opportunities for waste minimization as it relates to Safety-Kleen facility operations.
3. Train personnel by communicating waste minimization alternatives as it relates to daily facility operations.
4. Provide written waste minimization information to management.

This document addresses the four phases of the Safety-Kleen program.

Section 2.0

What is Waste Minimization?

Waste minimization is specifically required by the U.S. Congress in the 1984 Hazardous and Solid Waste Amendments to the Resource and Conservation and Recovery Act (RCRA). Waste minimization consists of source reduction and recycling. More specifically, waste minimization is the reduction of the generation and disposal of hazardous waste. It includes source reduction and recycling that results in either:

- * The reduction of the total volume or quantity of hazardous waste, or
- * The reduction of the toxicity of hazardous waste.

Waste minimization results in the minimization of threats to human health and the environment. Figure 2-1 on page 2-4 depicts waste minimization techniques.

2.1 Volume (Source) Reduction

Volume or source reduction is any activity that reduces or eliminates the generation of hazardous waste at the source. Controlling the sources of waste generation reduces the volume of hazardous waste that is produced.

Safety-Kleen personnel consider using the following volume reduction activities:

Substituting Materials - Using materials which do not create a waste, or which can be beneficially reused, recycled, or reclaimed.

Examples of Safety-Kleen's source reduction techniques are:

- * Using dirty mineral spirits instead of clean for drum washing.
- * Using corn cob absorbent instead of clay, since it can be fuel blended.
- * Using metal filters on machines, instead of the disposable cloth filters.

Technology - Changing processes, equipment, and operations to reduce the amount of waste generated.

An example of a technology change at Safety-Kleen is to reduce the amount of waste generated by no longer using liner bags to keep the inside of parts washer drums clean. This eliminates the additional liner bag waste material.

Operating Practices - Segregating waste streams, changing material handling procedures, and changing management practices.

Examples of Safety-Kleen's operating practices that result in waste reduction are:

- * Reducing the amount of spills that occur by more careful material handling.
- * Reducing the amount of waste generated from the cleanup of a spill by paving areas where releases are more likely to occur.
- * Segregating recyclable materials from trash.
- * Segregating contaminated burnable materials (labels, gloves, etc) and non-burnable materials (metal pieces, glass, rocks, etc.) to reduce the amount of landfilled waste.
- * Keeping containment areas clean so that any accumulated rainwater does not become contaminated.

See Section 3.0., Achieving Waste Minimization, for more information about volume reduction techniques.

2.2 Toxicity Reduction

Toxicity reduction results in reduced volume and types of waste generated. In some instances, Safety-Kleen has changed a process to limit or exclude contamination of waste with toxic components. More often, wastes are treated, either on or off-site, to remove toxic contaminants.

Safety-Kleen provides many services which remove hazardous and toxic components from a waste to return the cleaned material to beneficial use. For example, Safety-Kleen removes oil and water, in addition to hazardous waste constituents of lead and perchloroethylene, from used ethylene glycol. The reclaimed ethylene glycol is then marketed to ethylene glycol buyers.

2.3 Recycling

Recycling includes using, reusing, or reclaiming a material. Recycling occurs either on the site of generation or at a separate, off-site facility. Additional details on recycling are provided in Section 3.0, Achieving Waste Minimization.

2.4 Elements of a Waste Minimization Program

As discussed earlier, RCRA requires generators to establish waste minimization at their facilities. To do this cost-effectively, Safety-Kleen's waste minimization program has the following elements:

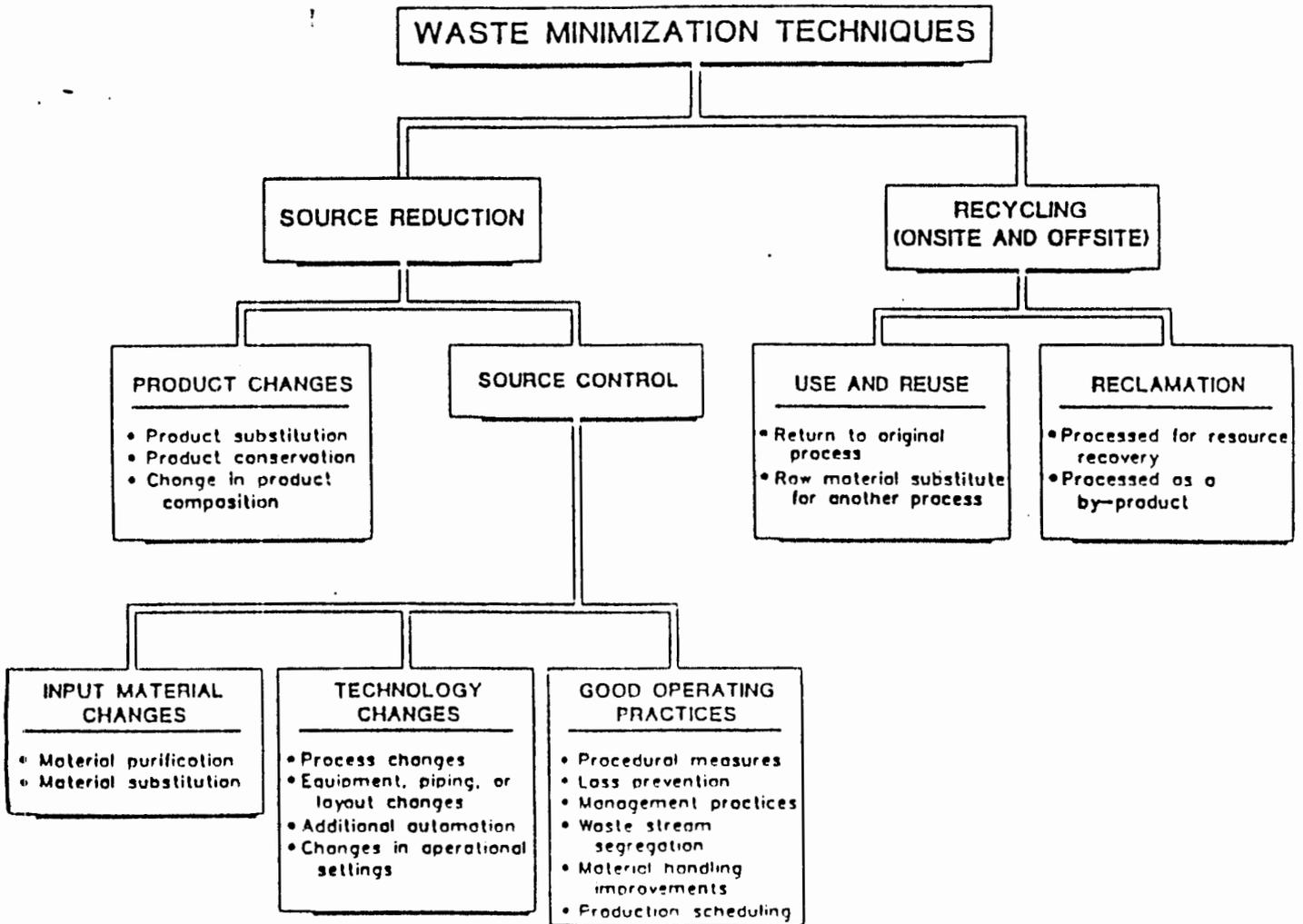
- * Management Commitment - The facility personnel understand why waste minimization is important. Management supports and rewards employees for developing and implementing waste minimization.
- * Waste minimization assessment - The facility personnel evaluate ways to reduce and eliminate waste. This assessment analyzes what materials are used, what materials can be substituted, how mixing of waste can be avoided, and whether alternate technologies are available for reducing waste.

For example, Safety-Kleen encourages mixing only when it facilitates the beneficial reclamation and reuse of BOTH waste streams. An example is the mixing of hazardous and non-hazardous waste solvent. Since it is not economically feasible to ship these streams to the reclamation facility without mixing, Safety-Kleen has decided that mixing these streams facilitates increased reclamation of these wastes.

However, mixing of solvents and other wastes with waste oil decreases the feasibility of reclaiming the used oil for any purpose other than fuels blending (this can occur when both are shipped by the same carrier). Therefore, mixing with waste oil is strongly discouraged.

Figure 2-1
Waste Minimization Techniques

**FIGURE 2-1
WASTE MINIMIZATION TECHNIQUES**



NOTE: Figure prepared by ERM South for Safety-Kleen

Section 3.0

Achieving Waste Minimization

Safety-Kleen achieves waste minimization in several ways. The following briefly discusses options that Safety-Kleen practices at its facilities.

3.1 Source Reduction through Good Operating Practices

Safety-Kleen operating practices facilitate reduction of waste at the source as follows:

Waste Segregation - Encouraging employees to use specific waste receptacles.

Examples of waste segregation techniques practiced at Safety-Kleen are:

- * Paper waste is divided into recyclable waste and non-recyclable waste.
- * Used petroleum products are not mixed with other solvent waste.
- * Water-based waste, such as antifreeze, is segregated from other solvents.

This minimizes the quantities of wastes that require special handling when generated.

Material Handling and Inventory Practices - Safety-Kleen management ensures that hazardous materials are properly stored to avoid spillage or damage and the resulting cleanup of waste material. Proper inventory management ensures that materials are not discarded due to age. Similarly, hazardous materials are ordered in quantities sufficient for operation. Larger quantities are not stored that could result in improper storage, exceeding of shelf-life, and spills or accidents involving crowded storage areas.

Loss Prevention - Materials can become wastes when equipment leaks or spills occur. In addition, using too much of a material results in waste generation (for example, using too much solvent creates more waste). Safety-Kleen management reminds employees to properly maintain equipment and to avoid mishaps such as spills of solvents.

Cost Accounting Procedures - For Safety-Kleen facilities, cost-accounting of waste disposal costs encourages significant waste minimization. When specific departments are held accountable for their own waste disposal cost, they are more waste conscientious. Management periodically reviews each facility's performance in waste generation and management.

Production Schedules - The product Distribution Centers schedule their trips to service centers to reduce the need for frequent equipment cleaning, which could result in waste generation.

3.2 Source Reduction through Process Modifications

Safety-Kleen management considers the following options to reduce waste using process modifications:

- * Changes in production methods
- * Changes in equipment
- * Changes in operating conditions, such as flow rates, temperature, pressure, residence time

3.3 Source Reduction through Product Changes

Safety-Kleen considers opportunities to minimize waste by changing products. Changes include:

- * Substituting products - Safety-Kleen now supplies a less toxic non-halogenated Immersion Cleaner (699) in place of much of its old formula to its customers.
- * Conserving products
- * Changing the composition of the product

3.4 Waste Minimization through Material Recycling and Recovery

Recycling: Use or Reuse

Recycling may be achieved through use or reuse of a waste material. Essentially the waste material is returned to a process to replace a certain amount of new material. The process may be the same process from which the waste came, or an entirely new process.

Examples of Safety-Kleen's recycling practices include:

- * Reusing paint wastes in a painting process that does not require a specific color
- * Using sludges as fuel

Recovery: Reclamation

Reclamation involves recovering a valuable material from hazardous wastes and nonhazardous wastes. Generally, a reclaimed material is not used at the same facility where it was generated.

Examples of Safety-Kleen's reclamation practices are:

- * Reclaiming fuel oil from waste oil
- * Recovering silver from film processing wastewater equipment

Safety-Kleen Recycling and Recovery Services

Safety-Kleen provides many services to its customers that can help them meet waste minimization responsibilities through recycling and recovery.

Examples of Safety-Kleen's services are:

- * Safety-Kleen collects spent antifreeze, waste oil, and organic solvents and distills these to remove solids and contaminants. The waste material then becomes reusable for Safety-Kleen customers.
- * Safety-Kleen also fuel blends cleanup materials from hazardous waste spills and organic-based absorbent material and sludges from storage tank maintenance. Fuel blenders who operate permitted facilities mix these wastes with fuel for energy generation.

Section 4.0

Identifying Waste Minimization Opportunities

Safety-Kleen management is encouraged to evaluate the following opportunities to establish a successful waste minimization program.

4.1 Understanding the Facility Processes

Safety-Kleen management assesses where hazardous waste is generated at a facility, what kinds of wastes are generated, and analyzes the processes associated with products or services. Management then determines which kinds of waste minimization techniques are feasible.

4.2 Knowing the Materials Used

Knowing what is used in a facility process is important in determining waste minimization options. Management considers whether:

- * A substitute to the material can be used.
- * The material quantity can be reduced.
- * Wastes can be introduced back into the process to reduce the amount of new materials used.

4.3 Training Employees and Education

Once management establishes a plan for waste minimization, employees must be trained in implementing it.

Training includes:

- * Explaining that waste minimization is important because it:
 - Protects the health of workers
 - Protects the environment
 - Meets regulatory requirements
 - Saves the Company money

-
- * Explaining the requirements of the work plan:
 - Who is responsible for the different parts of the plan
 - How facility processes will change
 - How the program will be monitored
- * Emphasizing management commitment to waste minimization
 - Checking with staff on the progress of the waste minimization program
 - Rewarding employees for waste minimization

Section 5.0

Understanding the Costs/ Benefits of Waste Minimization

Safety-Kleen managers understand that waste minimization is required and that there are costs associated with waste minimization. However, there are also very significant benefits.

5.1 Cost to Facilities

The facility personnel who implement waste minimization evaluate their business and the alternatives available to them. The time spent performing this evaluation has a cost. In addition, if the facility substitutes materials or uses additional recycling services, there may be some cost associated with this.

5.2 Benefits of Waste Minimization

Waste minimization has many benefits. Safety-Kleen management emphasizes these benefits, as discussed below.

Economic Benefits

- * Disposal Cost Reduction - The costs of landfilling and incinerating hazardous waste is increasing. Disposal options will become more costly and limited over time.
- * Costly Alternative Treatments - Certain waste streams will become more and more difficult to treat as disposal options become limited. Alternate technology to treat waste is expensive.
- * Savings in Materials Cost - When a facility practices waste minimization, it uses fewer materials. This reduces the cost of operating the business.

Regulatory Benefits

- * Specific Requirements - All generators of hazardous waste are required to minimize the waste they generate. Generators must demonstrate waste minimization when they sign a waste manifest, when they submit a biennial report under RCRA, or when applying for facility permits.

- * Land Ban - Since some waste is banned from land disposal, waste minimization avoids this regulatory limitation.

Liability Benefits

- * Generator Liability - RCRA established cradle-to-grave liability. Therefore, Safety-Kleen is responsible for managing wastes stored on-site at facilities, in transit, and when disposed of. Waste needs to be disposed of properly to avoid becoming a potentially responsible party for the cleanup of the contamination. Safety-Kleen must encourage employees to avoid liability by minimizing waste generation.
- * Potential Worker Safety - The U.S. Environmental Protection Agency and the Occupational Safety and Health Administration evaluate whether facilities are properly protecting their employees from hazardous materials and wastes found in the workplace. Safety-Kleen management minimizes potential employee exposure to hazardous waste by encouraging waste minimization.
- * Public Image Benefits - Safety-Kleen's ability to operate responsibly helps the Company obtain its customers' confidence. This is especially important when Safety-Kleen demonstrates to community members that its business is a safe and productive addition to the community.

Section 6.0

Characterization of Waste Generation

Safety-Kleen is including a Characterization of Waste Generation in the Waste Minimization Program.

6.1 Waste Generation Sources

This characterization is intended to identify the types, amounts, and hazardous constituents of waste streams, with the source and date of generation.

- The majority of the waste that is manifested from the service center (for which Safety-Kleen is indicated as the generator) is not actually generated by the Safety-Kleen service center. The majority of waste is generated by Safety-Kleen customers and is remanifested by Safety-Kleen to a processing facility. Also, much of the waste that is actually generated at the branch, such as residual sludge from the solvent bulking operations and spill residue, is mostly waste that was originally generated by Safety-Kleen customers.
- Waste reduction is an important part of Safety-Kleen's business. The heart of Safety-Kleen's business is waste reduction through recycling and reuse of wastes. The majority of the waste that Safety-Kleen handles is the primary feedstock for Safety-Kleen products. Waste that cannot be recycled but has a high BTU value is used as a supplemental energy source at one of three fuel blending facilities for cement kilns.

For these reasons, the requirements and intent of the Characterization of Waste Generation Report is not directly applicable to a Safety-Kleen Service Center. However, the following information is provided by Safety-Kleen to meet the requirements and the intent of the Characterization of Waste Generation Report.

6.2 Description of Waste Generating Activity

The Safety-Kleen Farmington, New Mexico Service Center is a permitted hazardous waste storage facility, and is also a large quantity generator. However, the Farmington, New Mexico Service Center does not actually generate the majority of the hazardous waste it manifests. The following is a brief description of Safety-Kleen operations:

- * **Parts Washer Service**--This service involves leasing, to automotive and industrial customers, a small parts cleaner machine. A parts cleaner machine consists of a 5-16- or 30-gallon container of solvent, a sink and a circulating pump. The solvent is circulated every time the parts cleaner unit is used. Periodically, the container of spent solvent is replaced with a container of clean, recycled solvent. The spent solvent is returned to the service center and transferred into a bulk tank for storage. On a regular basis, the spent solvent is transported via tanker truck to a Safety-Kleen recycle center. The spent solvent is processed into clean recycled solvent and returned to the service center in bulk tankers for return to our parts washer service customer.
- * **Immersion Cleaner Service**--A second line of business is the Immersion Cleaner (IC) machine. Similar to the parts cleaner machine, it consists of a container with IC and an agitating basket for difficult to clean parts. Periodically, the container of spent IC is replaced with clean IC. The spent IC is taken to the service center where it is stored with compatible wastes and transported in its original container to a recycle center.
- * **Dry Cleaning Service**--A third line of business is the dry cleaner service. Through this service, sales representatives pick up dry cleaning wastes,(filters, still bottoms, separator water) contaminated with dry cleaning solvents (usually perchloroethylene) in 15- and 30-gallon containers. The waste is taken back to the service center where it is stored with compatible wastes and transported in its original container to a processing facility.
- * **Paint Waste Service**--A fourth line of business is the paint waste collection service. Through this service, Safety-Kleen provides its customers with a paint gun cleaner for auto body shops, etc. This machine features a reservoir of lacquer thinner for cleaning paint guns. Periodically, the spent solvent is replaced with clean product. The containers are brought back to the service center where they are stored with compatible wastes and transported in their original containers to a recycle facility for processing. Residual paint waste is also brought back to the service center to be sent for recycling.
- * **Waste Oil and Waste Antifreeze Service**--Another line of business is Safety-Kleen Oil Services. This service picks up used oil and spent antifreeze from oil change shops, repair garages or industrial customers. These wastes are picked up in a tanker truck or in containers, and returned to the service center. At the service center, they are transferred into storage tanks or placed in a storage area. The antifreeze is transported to an appropriate processing facility where it is recycled or reused. The used oil is transported to the Safety-Kleen re-refinery.

In each of these services, the waste is manifested from the customer to the service center. It is stored at the service center until sufficient quantities are accumulated. It is then manifested from the service center, with Safety-Kleen as the generator, to an appropriate processing facility.

- * **Waste Oil and Waste Antifreeze Service**--Another line of business is Safety-Kleen Oil Services. This service picks up used oil and spent antifreeze from oil change shops, repair garages or industrial customers. These wastes are picked up in a tanker truck or in containers, and returned to the service center. At the service center, they are transferred into storage tanks or placed in a storage area. The antifreeze is transported to an appropriate processing facility where it is recycled or reused. The used oil is transported to the Safety-Kleen re-refinery.

In each of these services, the waste is manifested from the customer to the service center. It is stored at the service center until sufficient quantities are accumulated. It is then manifested from the service center, with Safety-Kleen as the generator, to an appropriate processing facility.

6.3 Amount of Generated Wastes

A Safety-Kleen Service Center does generate some waste during its daily operations. The wastes generated at the facility include dumpster sludge, contaminated gloves, rags, etc from daily operations and spill residue. The following lists the total quantity of waste manifested from the service center in 1994.

1993

Annual Amount and Types of Wastes Generated

Total "Generated":

* Parts Washer Solvent	249,950 pounds
* Solvent(Dry Cleaning)	(not terminated at this facility)
* New Immersion Cleaner(699)	8,422 pounds
* Old Immersion Cleaner(609)	(Not terminated at this facility)
* Lacquer Thinner/Paint Waste	(not terminated at this facility)
Dry Cleaning	
- Perchloroethylene	4,916 pounds
* - Freon	(Not terminated at this facility)
Used Oil	(Not terminated at this facility)

Wastes Generated at the Service Center:

* Solvent Sludge	39,565 pounds
------------------	---------------

waste is placed into containers and transported as a hazardous waste to an appropriate processing facility.

- * **Contaminated Rags, Gloves, etc.** are generated through the daily handling of various wastes mainly during the return-and-fill operations. Any objects contaminated by waste mineral spirits are containerized and handled as a hazardous waste.
- * **Spill residue** is generated when a spill occurs on a truck, at a customer's place of business or at the service center. The waste is cleaned using sorbent material. It is containerized and transported as a hazardous waste to an appropriate processing facility.

**6.4 Analysis of Technically and Economically Feasible
Hazardous Waste Reduction Techniques for the Facility:**

- * Monitor return-and-fill operational procedures to ensure that spills and drips are minimized; thereby reducing the volume of spill cleanup wastes.
- * Reduce any excessive use of rags and gloves by the facility employees.
- * Encourage safe material handling and reduced incidents of spills.

Section 7.0

Programs to Assist Generators in Waste Minimization

Safety-Kleen strives to be the leader in providing services which are user safe and environmentally friendly in the workplace. Safety-Kleen continues to work on new technologies designed to assist generators in meeting the waste minimization goals of U.S. EPA and the State of New Mexico.

7.1 150 Premium Solvent Parts Washing Service(1993)

The purpose of the new 150 Premium Solvent program, which utilizes a high flash point (148 degree F) parts washer solvent, is to provide a Waste Minimization Program alternative to parts cleaning customers who currently utilize hazardous materials to accomplish this task.

The following procedure describes how Safety-Kleen dispenses the Premium Solvent to its customers, manages the waste within the Safety-Kleen operation and ultimately recycles this new material via company-owned and operated recycling facilities.

- * The Premium Solvent is dispensed at the Service Center into clean 5-, 16-, or 30-gallon containers and delivered to customers who have been previously screened and carefully selected to participate in the Premium Solvent Program.
- * Customers are trained by Safety-Kleen representatives in proper use of the material to insure the resulting waste remains non-hazardous. All Premium Solvent service customers also view a Safety-Kleen video tape which illustrates how the customers must properly use the material and segregate the Premium Solvent from potential sources of contamination which could cause the waste to become hazardous.
- * Each Premium Solvent customer is required to sign a certification attesting to the fact that their solvent waste remains non-hazardous upon their use of the material.
- * The resulting non-hazardous waste is picked up by Safety-Kleen sales and service representatives and transported to a Safety-Kleen Service Center in the same container.

- * Premium Solvent waste drums are processed in the same manner as the 105 degree F hazardous parts washer solvent waste via a bulk waste tank. The bulk storage tank remains permitted as a hazardous waste management unit with bulk hazardous waste shipments of parts washer solvent manifested to Safety-Kleen Recycle Centers for redistillation. The solvent is returned to branches as recycled 105 degree F parts washer solvent.

As a precaution, Safety-Kleen conducts laboratory analysis on several representative samples of customer waste in order to document compliance with each facility's waste analysis plan.

7.2 Cyclonic Parts Washer Service(1993)

The Safety-Kleen Cyclonic Parts Washer Service provides a high flash point solvent in a Cyclonic filtration parts washing machine. The intent of the program is to provide generators with an option for reducing the amount of waste parts washer solvent removed from their premises.

The Cyclonic filter represents a leading-edge technology which is designed to remove contaminants from parts washer solvent (through patented technology) as the parts washer unit is being used. The contaminants are captured in a small interior detention basin which is periodically serviced by a Safety-Kleen service representative. The residue from the basin is placed in a container inside the parts washing unit until a sufficient quantity is accumulated to justify removal from the generation site. The residue is brought back to the service center with the solvent and then transported to a Safety-Kleen recycle center for processing.

The Cyclonic Parts Washer removes the solids from the solvent which lessens the servicing cycle for up to one year.

Section 8.0

Identifying Other Informational Sources

Safety-Kleen management informs employees about other sources of waste management information.

8.1 Federal Government

The U.S. EPA provides businesses with assistance in waste minimization. Safety-Kleen and its customers can call the U.S. EPA RCRA/Superfund Hotline at (800) 424-9346.

In addition, the U.S. EPA publishes a number of guidance documents for pollution prevention and waste minimization. Safety-Kleen and its customers can obtain these guides through the U.S. EPA or the U.S. Government Printing Office (202) 783-3238.

8.2 State and Local Assistance

New Mexico Environment Department provides guidance for the Safety-Kleen Farmington facility. The phone number is (505)827-4308.

In addition to the state, local agencies may have information. In general, Safety-Kleen and its customers can contact environmental agencies or health departments for reference to local agencies that deal with hazardous waste issues.

Section 9.0

Employee Involvement in Waste Minimization

The form in Example 9-1 is used for employee suggestions for waste minimization at Safety-Kleen facilities. This form is signed by the employee and reviewed by his manager before being submitted to the Regional Environmental Engineer. A copy of the form is filed in EHS file 2010 - Waste Minimization.

Wherever possible, the employee includes cost justification savings that would result from implementation of the idea.

Regional Environmental personnel review ideas and refer them to upper management for possible implementation.

Figure 9-1

Waste Minimization Suggestion Submission Form

Description of the procedure or process change suggested (attach additional pages and diagrams if needed):

Estimated capital cost of the change: \$ _____

Estimated annual expenses from the change: \$ _____

Estimated annual savings from the change: \$ _____

Employee Name

Manager Name

Signature

Signature

Title

Title

____/____/____
Date

____/____/____
Date

Branch Number