

SKFA 01



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State of New Mexico  
**ENVIRONMENT DEPARTMENT**

*Hazardous Waste Bureau*  
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PETER MAGGIORE  
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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

January 9, 2001

Mr. Daniel Czecholinski  
Safety-Kleen Systems, Inc.  
4210 A. Hawkins Road  
Farmington, NM 87401

**RE: ADMINISTRATIVE COMPLETENESS AND  
REQUEST FOR SUPPLEMENTAL INFORMATION  
RCRA PERMIT APPLICATION RENEWAL (OCTOBER 04, 2000)  
SAFETY-KLEEN SYSTEMS, INC.,  
EPA ID # NMD980698849  
HWB-SKFA-00-001**

Dear Mr. Czecholinski:

The Permits Management Program of the New Mexico Environment Department's Hazardous Waste Bureau (HWB) has reviewed the document referenced above, and has found the permit application to be administratively incomplete. The HWB requests supplemental information (RSI) as detailed below. Please respond to this RSI within 30 days of receipt of this letter.

Supplemental Information Needed:

- 1) Safety-Kleen should verify the Resource Conservation and Recovery Act (RCRA) Permit revision date listed on the cover page is correct. The revision date indicated on the submitted cover page is December 2, 2000.
- 2) Two different facility addresses are listed in the RCRA Permit Application. Part A of the RCRA Permit Application has a facility address of 4210A Hawkins Road. Most of the submitted facility drawings indicate the facility address is 4200 Hawkins Lane. Safety-

Kleen should indicate which facility address is correct and make corrections in the RCRA Permit Application where necessary.

- 3) Two different owners are listed within the RCRA Permit Application. The Hazardous Waste Permit Application, Part A, Section VIII lists the facility's legal owner as Safety-Kleen Systems Inc. However Section 1.0 Facility Description, page 1-1, lists the facility owner as COMET Corporation. Safety-Kleen should correct the owner name within the RCRA Permit Application where necessary.
- 4) Safety-Kleen should complete filling out all applicable sections of the Hazardous Waste Permit Application-Part A. Page 2 of 7, Section VIII, Subsection B owner type is blank.
- 5) Safety-Kleen should complete filling out all applicable sections of the Hazardous Waste Permit Application-Part A. Columns B (Estimated Annual Quantity of Waste) and C (Unit of Measure) were left blank for most of the listed waste entries on pages 6a to 6c.
- 6) Safety-Kleen should provide a topographic map or maps representing an area extending to at least one mile beyond the property boundaries of the facility as required by 20.4.1.900 NMAC, incorporating 40CFR § 270.13(l).
- 7) Safety-Kleen should provide a description of the traffic pattern around the facility as required by 20.4.1.900 NMAC, incorporating 40CFR § 270.14 (b)(10).
- 8) Safety-Kleen should provide a map delineating the extent of the 100-year floodplain in the vicinity of the facility as required by § 20.4.1.900 NMAC, incorporating 40CFR § 270.14 (b)(11)(iii).
- 9) Safety-Kleen should provide a topographic map showing a distance of 1000 feet around the facility at a scale of 1 inch equal to not more than 200 feet, as required by 20.4.1.900 NMAC, incorporating 40CFR § 270.14 (b)(19).
- 10) Safety-Kleen should provide information on the containment system for the container storage area as required by 20.4.1.900 NMAC, incorporating 40CFR § 270.15 (a)(5). Safety-Kleen should specifically address how accumulated liquids can be analyzed and removed from containers to prevent overflow.
- 11) Safety-Kleen should provide information on air emission control equipment as required by 20.4.1.900 NMAC, incorporating 40CFR § 270.16 (k).

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- 12) Safety-Kleen should provide the maximum organic vapor pressure limit for the hazardous waste storage tank as required by 20.4.1.500 NMAC, incorporating 40CFR 264.1084 (b)(1)(i).
- 13) Safety-Kleen should provide page 5 of the tank-system certification for Attachment E.2, Tank-System Certification.
- 14) Floor plan drawings in Attachment E.3, show two different values for trench capacity. Safety-Kleen should verify the trench capacity and correct the values in the RCRA Permit Application where appropriate.
- 15) Safety-Kleen should address Air-Emission standards within the contingency plan as required by 20.4.1.900 NMAC, incorporating 40CFR § 270.14(b)(7).

Should you have any questions regarding this letter or if you would like to discuss the comments prior to your response, please contact Robert Warder at (505) 827-1557 x 1052 or myself at (505) 846-0053.

Sincerely,



Roland Rocha  
Project Leader, SKAL/SKFA  
Hazardous Waste Bureau

RR:rw

cc: J. Bearzi, NMED HWB  
J. Kieling, NMED HWB  
R. Dinwiddie, NMED HWB  
W. Moats, NMED HWB  
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