

RCR SKFA/02



GARY E. JOHNSON
GOVERNOR



State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
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PETER MAGGIORE
SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

February 20, 2002

Mr. Dan Czecholinski
Safety-Kleen Corp.
6625 W. Frye Road
Chandler, Arizona 85226

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION
SAFETY-KLEEN SYSTEMS, INC. STORAGE FACILITY RCRA PERMIT
APPLICATION, FARMINGTON FACILITY
EPA ID NMD980698849
TASK # HWB-SKFA-00-001**

Dear Mr. Czecholinski:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) has reviewed the Safety-Kleen Systems, Inc. (Safety-Kleen) RCRA Permit Application submitted to the HWB on October 4, 2000. HWB has made a determination that additional information is required prior to granting technical and administrative adequacy pursuant to 20.4.2.200 (A) (3) (a) and (b) NMAC. Please respond to this Request for Supplemental Information within thirty (30) days of receipt of this letter.

Please supply the following information.

1. Part A, Section 1.B, Page 1 of 7 – Please verify if the amendment number is 10/4/99. If that is the date of the amendment submittal, please provide the actual amendment number.
2. Part A, Section XIII, Page 4 of 7 – If this section is not applicable to the permit application then “NA” must be inserted into this section.
3. Part A, Section XVIII, Page 7 of 7 – The Facility’s legal owner is listed as Comet Corporation of Farmington, NM in Section VIII. In Section XVIII, Mr. Mike Crawford signed as Branch Manager in the owner signature section. The HWB is unclear as to whether Mr. Crawford is the Branch Manager of Safety-Kleen Systems, Inc. or of Comet

Corporation. Mr. Crawford's name is also listed in Section XVIII in the operator signature section. In order to validate the owner signature in this section, please provide verification that Mr. Crawford is an employee with duties and responsibilities commensurate with the level of vice president of Comet Corporation. If this is not the case, please submit an updated Part A permit application to include the valid owner and operator signatures in Section XVIII.

4. Part A, Photographs – Please include the dates when Photographs 1 through 6 were taken.
5. Attachment A, Waste Analysis Plan, Page A-1 – The annual capacity of spent solvents is listed as 12,000 gallons whereas the annual amount of spent solvent accepted is 50,000 gallons. Please correct this discrepancy. Additionally, the second column is labeled “Facility Code Nos.” which should be changed to EPA Hazardous Waste Number.
6. Attachment A, Waste Analysis Plan, Page A-11 – In Table A-3, numbers 3 and 4, Spent Immersion Cleaner and Dry Cleaning Wastes, appear to have incorrect reference numbers. Please verify if these are correct and if not, please submit a corrected table.
7. Attachment C, Personnel Training – Please submit a written description of the type and amount of continuing training given to each employee pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.16 (d) (3)).
8. Attachment G, Closure Plan – An estimate of the maximum inventory of hazardous wastes ever on site over the active life of the facility must be provided as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.112 (b) (3)).
9. Attachment G, Closure Plan – Safety-Kleen should provide detailed descriptions of the steps to be used to remove or decontaminate all hazardous waste residues, system components, structures, methods for sampling, surrounding soil testing, and for determining the extent of decontamination during partial and final closure in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.112 (b) (4)).

The descriptions should include a map of the facility detailing proposed sampling points, types of samples, and the number of samples, up to date sampling methods for the determination of contamination for the wastes currently being handled in each portion of the facility, applicable groundwater monitoring, current soil testing methodology, and other detailed descriptions necessary as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.112 (b) (5)).

10. Attachment G.1, Closure Costs – Safety-Kleen shall prepare and provide a detailed written estimate of the cost of closing the facility in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.142).

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11. Attachment H, Financial Liability Documents – Attachment H contains two separate options for demonstrating financial assurance. These are “Closure Insurance” pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.143 (e)) and the “Financial Test and Corporate Guarantee for Closure” pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.143 (f)). Please verify which method Safety-Kleen plans to use for demonstrating financial assurance.
12. Attachment H, Financial Liability Documents – Safety-Kleen shall submit the items required by 20.4.1.500 NMAC (40 CFR 264.143 (f) (3)) for the latest completed fiscal year to demonstrate compliance with the financial test and corporate guarantee for closure and post-closure if this is the correct method to be used for demonstrating financial assurance.
13. Attachment H, Financial Liability Documents – Safety-Kleen shall submit either the “Hazardous Waste Facility Liability Endorsement” or a “Certificate of Liability Insurance” as an amendment to the insurance policy contained in the permit application pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.151 (i) or 40 CFR 264.151 (j)).
14. Section 1.0 – Safety-Kleen shall provide a wind rose for the area surrounding the facility in accordance with 20.4.1.900 NMAC (incorporating 40 CFR 270.14 (b) (19) (v)).
15. Section 1.0 – Safety-Kleen shall provide information on injection and withdrawal wells on and off-site if applicable as required by 20.4.1.900 NMAC (incorporating 40 CFR 270.14 (b) (19) (ix)). If none exist, state so in the text of the permit application.
16. Attachment E, Preparedness and Prevention – Safety-Kleen shall address the prevention of run-on into the container storage area containment system as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.175 (4)).
17. Attachment E, Preparedness and Prevention – Safety-Kleen shall verify that containers holding ignitable or reactive wastes are located at least 50 feet from the Facility’s property line pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.176). The Safety-Kleen Site Plan, Figure E-1, indicates that the west boundary of the container storage area is within the 50-foot requirement. Please indicate on any applicable drawings the location of these containers.
18. Safety-Kleen should include the applicable sections of 20.4.1.500 NMAC (incorporating 40 CFR 264.1089) in the facility operating record.

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If you have any questions, please contact me by e-mail at robert_warder@nmenv.state.nm.us,
at the address above, or by phone at (505) 841-9040.

Sincerely,



Robert Warder, EI
Project Leader, SKAL/SKFA
Permits Management Program

cc: James P. Bearzi, NMED HWB
John Kieling, NMED HWB
Will Moats, NMED HWB
David Neleigh, Chief, EPA Region VI (6PD-N)

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