

SKFA 2002



Fax Cover Sheet

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SEND TO	DATE: 6-26-02
ATTENTION: Robert Warder	FROM: David Ashley
OFFICE LOCATION	OFFICE LOCATION SALIDA, CA BRANCH 7-185-01
FAX NUMBER 505-884-9254	PHONE NUMBER

URGENT REPLY ASAP PLEASE COMMENT PLEASE REVIEW FOR YOUR INFORMATION

TOTAL PAGES INCLUDING COVER SHEET _____

COMMENTS: Hard copy is in Airborne Express
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Overnight Via Airborne Express

June 26, 2002

Mr. Robert Warder
Project Leader, SKAL/SKFA
Permits Management Program
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Re: Supplemental Information for the RCRA Permit Application Renewal, Safety-Kleen Systems, Inc. Service Center, Farmington, New Mexico (NMD980698849)

Dear Mr. Warder:

Safety-Kleen Systems, Inc. (S-K) operates a service center in Farmington, New Mexico (4210A Hawkins Road) for temporary accumulation and storage of hazardous wastes, prior to transporting offsite for reclamation, treatment or disposal. A RCRA Permit Renewal Application was submitted to the New Mexico Environment Department/Hazardous Waste Bureau (NMED/HWB) on October 4, 2000. Supplemental information and revised drawings for the permit application were submitted with correspondence dated May 21, 2001.

In a letter dated February 20, 2002, NMED/HWB requested additional supplemental information. A response to the NMED/HWB requests and the requested information is provided with this correspondence. Each of the NMED/HWB requests is retyped below for convenience. A response providing the supplemental information follows each of the NMED requests.

NMED/HWB Request No. 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.

S-K Response No. 1.

The amendment number 10/4/99 is correct. The date of submission has been used to uniquely identify each revision to Part A of the Application for Hazardous Waste Permit. The ordinal number of this submission is unknown. If the date is not acceptable, the amendment number will have to be left blank as provided in "RCRA Part A Permit Application Forms and Instructions" (10/99), page 24.

NMED/HWB Request No. 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.

S-K Response No. 2.

This section is not applicable to the S-K Farmington site. Therefore, "NA" was inserted into this section of the revised Part A application as requested.

NMED/HWB Request No. 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.

S-K Response No. 3.

A revised signature page that reflects the current property owner and operator information is included with the revised Part A application (Attachment A). Mr. Crawford is the Branch Manager for Safety-Kleen.

NMED/HWB Request No. 4.

Part A, Photographs – Please include the dates when Photographs 1 through 6 were taken.

S-K Response No. 4.

Photographs 1 through 6 were taken on September 30, 2000 during a site visit as part of the permit renewal application process.

NMED/HWB Request No. 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.

S-K Response No. 5.

A revised Waste Analysis Plan Abstract Page is provided in Attachment B for insertion into the permit application. The annual amount of waste (i.e., 50,000 gallons of spent solvent) is correct).

NMED/HWB Request No. 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.

S-K Response No. 6.

Footnote 3 contains additional waste codes that may be associated with the waste types contained in the permit. The revised abstract page (Attachment B) includes Footnote 4, which reflects that the total amount of waste placed in the container storage area will not exceed the permitted capacity.

NMED/HWB Request No. 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)).

S-K Response No. 7.

The description of the training program includes reference to training that is conducted on an annual basis. The facility manager implements and provides the annual training program to the facility employees. (Please see attachment to this letter, "Training Summary".)

NMED/HWB Request No. 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 264.16 (b) (3)).

S-K Response No. 8.

At closure, the closure plan and associated cost estimate assume that the maximum inventory of wastes will be onsite at closure. At the S-K Farmington service center, the maximum capacity is the permitted capacity of each unit. The capacity of the waste tank, container storage area and drum washers within the return and fill station are currently listed on the Closure Plan Abstract.

NMED/HWB Request No. 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) (3)).

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)).

S-K Response No. 9.

The procedures to remove waste residues and decontaminate the tank, container storage area and drum washers are described in the closure plan. The closure plan may also be

revised to include methods for collecting soil samples at closure, and for determining the potential extent of impacts. As described in Section G.5 of the closure plan, if no lapses of integrity are found during the engineer's inspection at closure, soil samples do not appear to be necessary. However, if lapses of integrity that may have allowed wastes to migrate outside of containment are found, soil samples will be collected from beneath or immediately adjacent to potential lapses of integrity.

If soil sampling is determined to be necessary following the inspection, a coring tool (or similar) will be used to core through the concrete containment. The core and the underlying gravel base will be removed to expose the underlying soil. A soil sample will then be collected using a split-spoon or similar hollow tube sampler, lined with stainless steel or brass sleeves. The sampler will be driven through the uppermost soil sampling interval and retrieved. One 6-inch long soil-filled sleeve will be removed from the sampling device and prepared for analysis. Alternatively, a 6-inch stainless steel or brass sleeve may be directly pushed through the uppermost soil interval to fill, without using the split-spoon sampler.

The soil filled sleeves will immediately be covered with Teflon sheeting and plastic endcaps, labeled and placed on ice in a sample cooler. The soil samples will then be submitted under chain-of-custody to an offsite laboratory for analysis. At a minimum, the soil samples will be analyzed for volatile organic compounds, semi-volatile organic compounds and metals, using appropriate EPA analytical methods (i.e. SW-846, Test Methods for Evaluating Solid Waste).

The results of the initial soil samples will be evaluated to determine appropriate future activities. If the results are below appropriate closure or risk-based standards, then closure will be considered complete. However, if the results indicate impacts above closure or risk-based standards, a workplan will be prepared that will propose additional sampling locations to determine the potential extent of impacts to soil and if necessary, groundwater. The workplan will be submitted as a closure plan amendment. If applicable, the closure plan amendment will describe the types and number of samples required, sampling procedures and locations of proposed sampling areas.

S-K will revise the Closure Plan to incorporate the above referenced procedures, once NMED/HWB approves the proposed sampling procedures. The revised Closure Plan will then be submitted for insertion into the facility permit application.

NMED/HWB Request No. 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).

S-K Response No. 10.

A detailed cost estimate to implement closure of the facility will be prepared once the Closure Plan (including the proposed revisions described above) is approved. The closure cost estimate will detail activities and associated costs necessary to close the facility in accordance with the approved closure plan. The revised estimate will be prepared in accordance with the requirements of 40 CFR 264.142.

NMED/HWB Request No. 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.

S-K Response No. 11.

Safety-Kleen has chosen to provide funding for the closure plan with closure insurance. Please find attached, a letter dated January 25, 2002 addressed to Mr. Stuart Dinwiddie, Updated Financial Assurance for Closure and/or Post-Closure Safety-Kleen Systems, Inc. Albuquerque, NM NMD000804294 Farmington, NM NMD980698849.

NMED/HWB Request No. 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.

S-K Response No. 12.

Please see **S-K Response No. 11.**, above. Safety-Kleen will use closure insurance to fund the closure plan.

NMED/HWB Request No. 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 (l) or 40 CFR 64.151 (j)).

S-K Response No. 13.

Attached.

NMED/HWB Request No. 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)).

S-K Response No. 14.

A wind rose for the Farmington area is Attached. If acceptable, the wind rose may be inserted into the permit application at the end of Section 1.0, as Figure 10.

NMED/HWB Request No. 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.

S-K Response No. 15.

It appears that no injection or groundwater withdrawal wells are located in the vicinity of the site. A statement reflecting this has been inserted into permit application text. A copy of revised page 1-6 is included with this letter for insertion into the permit application.

NMED/HWB Request No. 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)).

S-K Response No. 16.

Run-on into the container storage area containment is prevented because the container storage area and containment are located inside the warehouse building. Run-on from a precipitation event is directed away from the building (and containment) to the facility's storm water management system. An updated page E-2 is included for inclusion in the permit application.

NMED/HWB Request No. 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.

S-K Response No. 17.

A hand drawing is attached indicating the position of the flammable waste relative to the property lines. The flammable waste is approximately 142 feet from the east edge of the property, 96 feet from the west edge of the property, 156 feet from the north property line, and 181 feet from the south property line. A mechanical drawing will be available within the next few days and will be forwarded immediately to you.

NMED/HWB Request No. 18.

Safety-Kleen should include the applicable sections of 20.4.1.500 NMAC (incorporating 40 CFR 264.1089) in the facility operating record.

S-K Response No. 18.

Applicable State and Federal record keeping requirements as referenced in 40 CFR264.1089 are incorporated into the facility operating record.

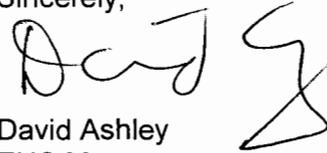
Summary of Part A changes:

1. Land Owner (Comet Corporation to sign)
2. Use ordinal number or leave revision number blank if "date" revision number is unacceptable.
3. "N/A" to be entered into Part A Section XIII (Page 4 of 7).

Part A of the Application For Hazardous Waste Permit is currently being circulated for signature and will be forwarded to you immediately upon completion.

Following NMED/HWB approval of the S-K responses, S-K will incorporate necessary revisions into the permit application (i.e. Closure Plan, closure cost estimate and financial assurance documentation). The revisions will be submitted as replacement pages for insertion into the application. S-K appreciates your assistance with the facility's permit renewal application. If you have any questions, please contact me at (602) 956-3068.

Sincerely,



David Ashley
EHS Manager
Safety-Kleen Corporation

Enclosures

cc: TriHydro Corporation
Steve LuQuire, Safety-Kleen

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.

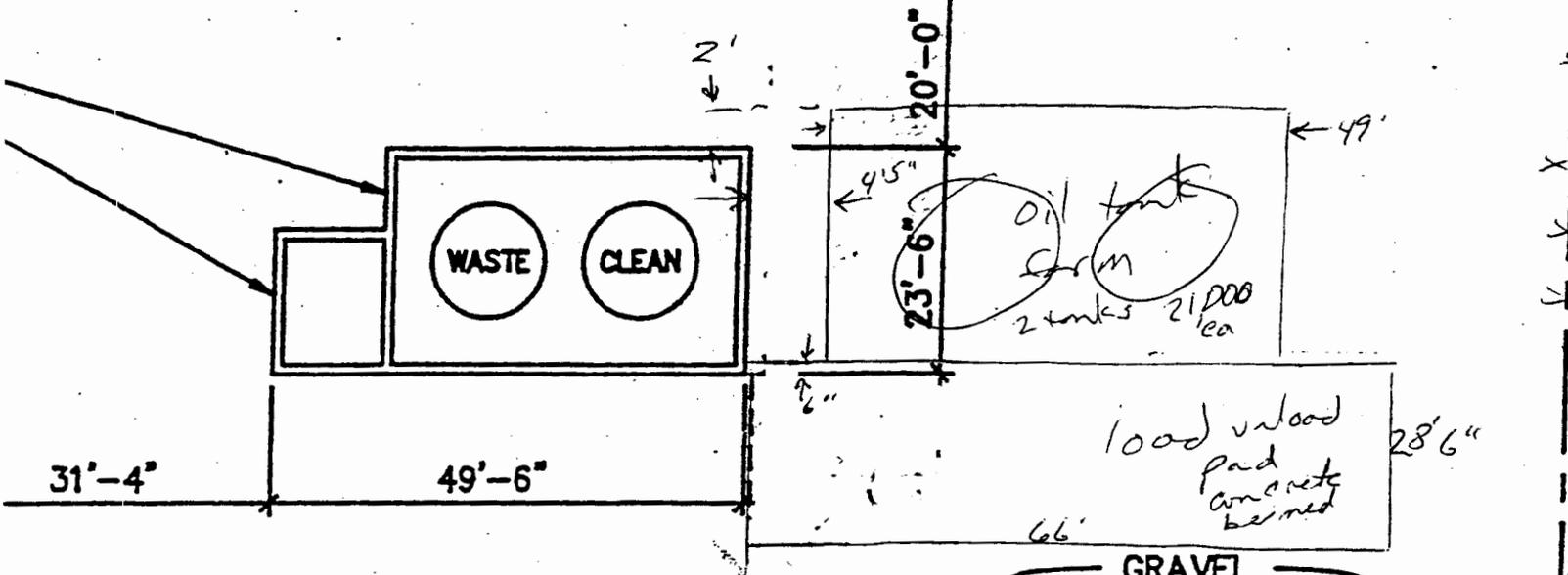
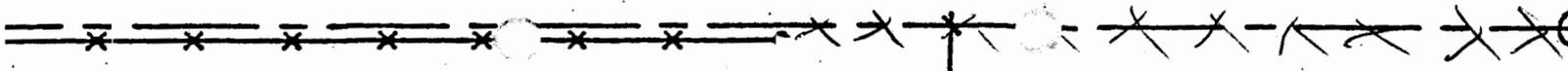
The city of Farmington obtains its water primarily from the Animas River through two pump stations. Pump station 1 is located about two miles east of Farmington and pump station 2 and the Bee Line reservoir are several miles northeast of Farmington. Standby water is obtained from a pump station several 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.

It appears that no injection or groundwater withdrawal wells are located in the vicinity of the site. 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 in 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.

This permit application has been organized similar to the previous permit application to maintain consistency. The remaining sections of this permit application (Waste Analysis Plan, Preparedness, and Prevention Plan, etc.) are included in attachments A through H. Relevant information associated with each attachment is presented at the end of each respective attachment.

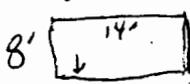
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GRAVEL

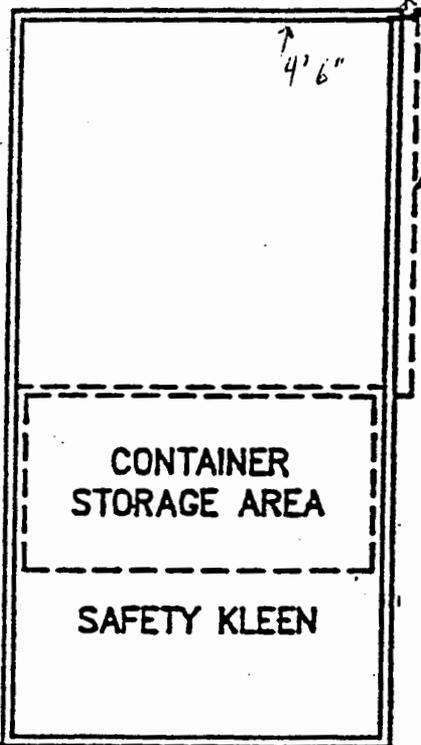
60'-0"

FLAM SHELTER



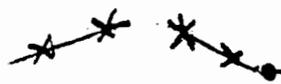
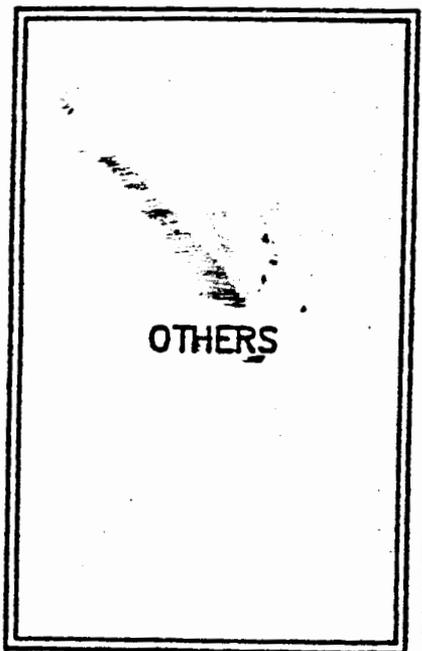
ASPHALT

8'



UNDERGROUND ELECTRICAL LINE TO SOLVENT SHELTER

ASPHALT



GATE

ROCK GARDEN

ROCK GARDEN

Training Summary

Customer Service Rep.;

- 8-Hour HAZWOPER Refresher (Annual)
- Bloodborne Pathogens (can be part of Hazwoper refresher) (Annual)
- Hazardous Materials Transportation Skills (Once every three years)
- RCRA Update (Annual)
- Driver Safety Training (including vehicle inspections and exempt log training) (Once every three years)
- Drum Closure (Once every three years)

Customer Service Rep. Oil and Vac;

- 8-Hour HAZWOPER Refresher (Annual)
- Bloodborne Pathogens (can be part of Hazwoper refresher) (Annual)
- Hazardous Materials Transportation Skills (Once every three years)
- RCRA Update (Annual)
- Driver Safety Training (including vehicle inspections and exempt log training) (Once every three years)
- Drum Closure (Once every three years)
- Cargo Tank Operations (Once every three years)
- Rail Tank Car Procedures (Once every three years)

Material Handlers;

- 8-Hour HAZWOPER Refresher (Annual)
- Bloodborne Pathogens (can be part of Hazwoper refresher) (Annual)
- Hazardous Materials Transportation Skills (Once every three years)
- RCRA Update (Annual)
- Drum Closure (Once every three years)

Secretaries;

- Health And Safety for Administration (Annual)
- Bloodborne Pathogens (can be part of Hazwoper refresher) (Annual)
- Hazardous Materials Transportation Skills (Once every three years)
- RCRA Update (Annual)
- Shipping Hazardous Material Samples (Annual)

Branch General Manager;

- 8-Hour HAZWOPER Refresher (Annual)
- Bloodborne Pathogens (can be part of Hazwoper refresher) (Annual)
- Hazardous Materials Transportation Skills (Once every three years)
- RCRA Update (Annual)
- Drum Closure (Once every three years)
- Cargo Tank Operations (Once every three years)
- Rail Tank Car Procedures (Once every three years)

WASTE ANALYSIS PLAN

ABSTRACT

Waste EPA Waste Description	EPA Hazardous Waste Numbers	Capacity ¹	Annual Amount ²
Spent Solvents	D001 ³	12,000	50
Bottom Sediment From the Tank and Ancillary Equipment	D001 ³	N/A	2
Spent Immersion Cleaner	D001 ³	4,464	3
Dry Cleaning Waste	D001, F002 ³		6
Paint Waste	F003, F005, D001 ³	4,464	
Photo Chemical Wastes	D011	4,464	

NOTES:

¹ The facility capacity is in gallons.

² The annual amount is in thousands of gallons.

³ and may also include 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 3,820 gallons.

Table A-3

Methods To Sample Hazardous Wastes

<u>Hazardous Waste</u>	<u>Reference for Sampling</u>	<u>Description of Sampling Method</u>	<u>Sampler</u>
1. Spent Solvents	Sampling a tank "Samples & Sampling Procedures for Hazardous Waste Streams" EPA – 600/2- 80-018	Test Methods for the Evaluation of Solid Waste Physical/ Chemical Methods, SW846, U.S. EPA Section 1.2.1.1	Coliwasa Tube
2. Solvent Tank Bottoms	Same as number 1	Same as number 1	Same as number 1
3. Spent Immersion Cleaner	Same as number 1	Same as number 1	Same as number 1
4. Dry Cleaning Wastes	Same as number 1	Same as number 1	Same as number 1

MARSH USA INC.

CERTIFICATE OF INSURANCE

CERTIFICATE NUMBER
ATL-000144537-00

PRODUCER
Marsh USA Inc.
Two Liberty Square
75 Beattie Place
Suite 300
Greenville, SC 29601-2130
Attn: Amy Browning

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER OTHER THAN THOSE PROVIDED IN THE POLICY. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES DESCRIBED HEREIN.

COMPANIES AFFORDING COVERAGE

- COMPANY
A AMERICAN HOME ASSURANCE CO
- COMPANY
B NATIONAL UNION FIRE INSURANCE COMPANY
- COMPANY
C INSURANCE CO STATE OF PA
- COMPANY
D VARIOUS INSURERS

INSURED
SAFETY-KLEEN SYSTEMS, INC.
AND ITS SUBSIDIARY AND AFFILIATED COMPANIES
P.O. BOX 11393
COLUMBIA, SC 29211

COVERAGES

This certificate supersedes and replaces any previously issued certificate.

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE DESCRIBED HEREIN HAVE BEEN ISSUED TO THE INSURED NAMED HEREIN FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THE CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, CONDITIONS AND EXCLUSIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR OWNER'S & CONTRACTOR'S PROT <input checked="" type="checkbox"/> \$500,000 SIR	GL1737655	09/01/00	09/01/01	GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 PERSONAL & ADV INJURY \$ 500,000 EACH OCCURRENCE \$ 500,000 FIRE DAMAGE (Any one fire) \$ 500,000 MED EXP (Any one person) \$ 50,000
A	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input checked="" type="checkbox"/> MCS-90	AL5273342	09/01/00	09/01/01	COMBINED SINGLE LIMIT \$ 2,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN AUTO ONLY: EACH ACCIDENT \$ AGGREGATE \$
B	EXCESS LIABILITY <input checked="" type="checkbox"/> UMBRELLA FORM OTHER THAN UMBRELLA FORM	BE7401064	09/01/00	09/01/01	EACH OCCURRENCE \$ 10,000,000 AGGREGATE \$ 10,000,000 *N/A TO INSURER "D" \$
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY THE PROPRIETOR/PARTNERS/EXECUTIVE OFFICERS ARE: <input type="checkbox"/> INCL <input type="checkbox"/> EXCL	WC4066579	09/01/00	09/01/01	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER EL EACH ACCIDENT \$ 1,000,000 EL DISEASE-POLICY LIMIT \$ 1,000,000 EL DISEASE-EACH EMPLOYEE \$ 1,000,000
D	OTHER CONSULTANTS ENVIR LIAB	STEADFAST INSURANCE CO PEC3783117-00 RELIANCE INSURANCE CO	09/01/00	09/01/01	EACH LOSS 5,000,000 AGGREGATE 10,000,000 EACH LOSS 5,000,000
D	POLLUTION LEGAL	NTL163264701	03/01/99	09/01/02	AGGREGATE 10,000,000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS (LIMITS MAY BE SUBJECT TO DEDUCTIBLES OR RETENTIONS)

SAMPLE COPY CERTIFICATE ONLY

CERTIFICATE HOLDER

*SAMPLE COPY CERTIFICATE

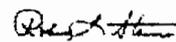
CANCELLATION

SHOULD ANY OF THE POLICIES DESCRIBED HEREIN BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE INSURER AFFORDING COVERAGE WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED HEREIN, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER AFFORDING COVERAGE, ITS AGENTS OR REPRESENTATIVES.

MARSH USA INC.

BY:

MM1(9/99)



VALID AS OF: 08/28/00