

SKAL2003



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUN 18 2003



Mr. John Kieling, Manager
Permits Management Program
New Mexico Environment Department
2905 Rodeo Park Drive East
Santa Fe, NM 87505

Re: Comments on the Draft RCRA Permits for Safety-Kleen in Farmington and Albuquerque

Dear Mr. Kieling:

The Environmental Protection Agency (EPA) has completed a review of the Draft RCRA Permits for Safety-Kleen Farmington (EPA ID No. NMD980698849) and Albuquerque (NMD000804294) and offer the enclosed comments. If you have any questions regarding the comments, please contact Rich Mayer at (214) 665-7442.

Sincerely,

A handwritten signature in black ink, appearing to be "Laurie King".

Laurie King, Chief
New Mexico and Federal
Facilities Section

Enclosure

Comments on the Draft RCRA Permits for Safety-Kleen Albuquerque and Farmington

Section 5.28.1 of Part 5 of the Permit; Action levels: Both permits mention that for human health levels carcinogens should not exceed a lifetime cancer risk of one in a million. Previous draft permits (Navajo Refining) or orders (LANL) issued by NMED have referred to a total lifetime risk of carcinogens of one in a hundred thousand. Has the NMED cleanup policy changed?

Section 5.27.3 of Part 5 of Permit; Identification, Screening and Development of Corrective Measures Technologies: It might be helpful if a sentence/small paragraph was included in both permits indicating that presumptive remedies may take the place of evaluating alternative remedies if it can be demonstrated that the presumptive remedy selected by the permittee has been successful on similar wastes/sites in New Mexico or the United States.