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December 29, 2009

CERTIFIED MAIL RETURN RECEIPT REQUESTED 7005 1160 0003 5021 7976

Mr. John E. Kieling, Manager
Permits Management Program, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

RE: Safety-Kleen Systems, Inc. (hereafter referred to as Safety-Kleen)
4210 A Hawkins Road
Farmington, NM 87401
EPA ID # NMD980698849
Class 1 With Prior Approval RCRA Part B Permit Modification Request

Dear Mr. Kieling:

In accordance with New Mexico Hazardous Waste Regulations NMAC 20.44.1.900 (40 CFR 270 incorporated by reference), this letter is a request to modify the subject facility's Part B Permit as part of the settlement of the October 9, 2009 notice of violation (NOV) issued to Safety-Kleen by the New Mexico Environment Department (hereafter referred to as NMED). Per discussions with your staff, this modification is classified as Class 1 with prior approval. A more detailed explanation of the changes is given below.

As part of the resolution to the NOV, MED requested both an update to the subpart BB equipment list and drawing in the facilities permit and an update to the inspection forms. Safety-Kleen transcribed Attachment 5, Inspection Plan and Schedule and then made changes to it in MS Word's tracking changes format. The version in tracking changes format is attached to this request. The first Subpart BB master list attached to this letter as part of Attachment 5 is how the pumps, valves and fittings are currently tagged. Subsequent to this list is a second list as described later in this letter that Safety-Kleen is requesting be the approved list for 'tagged' equipment and a third list if removal of the solvent reuse vat and associated valves and piping is approved. The details of the changes are as follows:

Attachment 5
Section 5.1
Paragraph #4: Removed the requirement to store the inspection records in the office of the Branch Manager. Specifying where the operating record is to be stored at a facility is not a regulatory requirement and thus is not necessary.

Paragraph #5:

1. Clarifies that the inspection frequency at the branch is each 'operating' day.
2. Removes the requirement for the service center manager to obtain help from Safety-Kleen Corporate if repairs can't be implemented by on-site personnel. The service center manager is responsible for obtaining the help he needs and it may be obtained from other than Safety-Kleen corporate personnel and thus this statement is unnecessarily restrictive and is removed and replaced with a more general statement.
3. Clarification is made that the record of repairs to items identified on the inspection record may

be recorded on the inspection record or elsewhere in the operating record.

Paragraph #6:

1. Clarifies that the inspection frequency at the branch is each 'operating' day.
2. Clarifies that the reporting of spills or other emergencies are to be reported immediately to the emergency coordinator and not just recorded on the inspection record for the emergency coordinator to find later when he reviewed the inspection form.

Paragraph #7: This paragraph is added to define the term 'Operating Day'. It is a day where employees load/unload bulk and/or containerized waste. Usually it is Monday through Friday but may be on holidays and/or weekends if needed due to operational needs.

Section 5.2 Inspection Schedule & Checklist

Paragraph #1

1. Some grammatical changes are made.
2. The language is changed to show that the forms in the permit are the forms to use during the inspections;
3. A statement is added that allows the facility to change the format of the inspection forms and to add non-permit required inspection items without a permit modification, but that they will be sent to NMED within 7 days after the change. This allows the facility to make improvements to the format of the forms and add items that the facility wants to track that are not required by the permit while making sure that NMED has up-to-date copies of the forms.

Section 5.2.1 Tank Inspections Paragraph #1

1. A change is made to clarify that the tank is inspected each operating day.
2. Reference to inspecting the product solvent tank is removed. The product solvent tank is not regulated by RCRA and thus does not need to be included in the RCRA permit. In addition, the product solvent in the tank is Safety-Kleen's Premium Solvent which has no hazardous characteristics.
3. The requirement to schedule a pickup of waste solvent when the spent solvent tank is 85% full is removed. Specifying this in the permit is not necessary as there is no regulation requiring it.

Section 5.2.1 Tank Inspections Paragraph #2

1. A change is made to clarify that the secondary containment is inspected each operating day for cracks or other deterioration.
2. Clarification is added that:
    a. The secondary is inspected daily for accumulated liquids unless the leak detection system in the secondary containment high level alarm provides notification of a leak or precipitation buildup within 24 hours.
    b. The branch will remove accumulated liquid within 24 hours of detection or within 24 hours of the end of a storm event.
    c. Only the tank farm inspection form, page 1 of 3 is required to conduct non-operating day inspections of the hazardous waste tank secondary containment system and that the days of the week preprinted on the form may be manually changed to show the correct day of the week that the inspection was performed.

Section 5.2.2 Solvent Dispensing Equipment

This entire section is deleted as the solvent dispensing equipment is not regulated by RCRA.

Section 5.2.4 Route Vehicles

This entire section is deleted as the route trucks are not regulated by RCRA.

Section 5.2.7 Security

Clarification is made that the frequency of the inspection is each operating day versus daily.

Attachment 5.1 Inspection Forms (cover page)

1. 'EXAMPLE' is removed from the title of each inspection form.
2. A note is added on this page stating that the types of wastes and/or products noted on the container storage area inspection forms can be changed as needed by the branch – either hand written or typed without a permit modification or notifying NMED. The types of wastes and products stored may change from time to time and this flexibility is necessary to allow Safety-Kleen to match the items actually being stored.
3. All inspection forms are changed to show the Printed Name / Initials / Title of the person doing the inspection and then only requiring the initials of the inspector for each day that person performed the inspections rather than requiring a signature on each day.

Inspection Log Sheet for the Container Storage Area

This form has been changed so that it more lines to write in waste and/or product being stored in the container storage area. This makes this form 2 pages long. As the branch uses this form, lines for waste/product may be added or deleted as needed based on the experience of the branch.

Inspection Log Sheet for the Tank System

1. Page numbers are added to the three forms for the tank farm inspections;
2. 'Farmington Hazardous Waste' is added to the title of the inspection records;
3. Page 1 of 3
    a. The '95%' level in feet and inches and gallons is added to the form;
    b. Clarifies that the 'Waste Solvent Tank' cannot be over 95% full;
    c. Added a place to record the level measurement of the tank in feet and inches and gallons.
    d. Added a line of 'A' & 'N' to record that the tank level is acceptable or not.
    e. A place to record the level of the product solvent tank is maintained for the convenience of the branch.
4. Page 3 of 3 – The valves, pumps and fittings currently tagged with numbers at the branch are typed in for subpart bb inspections.

Inspection Log Sheet for the weekly inspection (Safety & Emergency Equipment ...)

Under Security Devices for the Fence, 'Warning Signs' are added as a potential issue.

Leak Detection and Repair Record

Subpart BB is added to the title and 'Example' and other hand written notations are removed from the form.

VISUAL INSPECTON RECORDS – This form is deleted. It is not a RCRA required inspection.

SUBPART CC Visual Inspection Record - This form is incomplete in the current permit and is duplicated later in the Inspection Record section of the permit. It is removed.

VISUAL INSPECTON RECORDS – This form is deleted. It is not a RCRA required inspection.

Attachment 5-2 Vapor Pressure Summary and Subpart CC Compliance
Attachment 5-2, Table 1

1. A review of this table indicates that it is out of date both for the types of materials for which vapor pressures are shown and the vapor pressures. The table is updated to reflect

the latest vapor pressure information that Safety-Kleen's MSDSs has for these products and for commingled spent solvents.

2. The words 'waste solvent' that is hand written at the bottom of the table are removed.

Subpart CC Compliance Plan

This plan is updated to make it more specific to the Farmington facility and to make clarifying comments.

Subpart CC Visual Inspection Checklist

1. The title is changed from 'Checklists' to 'Checklist' since it is just one checklist.
2. The frequency is changed from conducting the inspection two times per year to meet the annual inspection requirement to conducting it once per year to meet the annual inspection requirement.

Equipment Inventory

1. The title is changed to read 'Subpart BB Equipment Inventory'.
2. The statement about completing it and where to file it are removed. Since it is part of the RCRA permit, it is part of the operating record.
3. The procedure is changed to make clarifications to the procedure and not duplicate information found elsewhere in this attachment.

PUMP LIST – This list is deleted as it is part of the Master List

MASTER LIST – This list is updated to include all currently numbered subpart BB equipment at the facility. In addition it lists other non-numbered equipment subject to the subpart BB requirements and tells how they may be distinguished from other equipment that is not subject to subpart BB as follows:

- All non-flanged fittings under the return and fill grate except the drip pan drain.
- All non-flanged fittings in the waste tank farm secondary containment area are marked with the color brown or are connected to piping that is marked with the color brown.

Proposed Isometric Equipment Drawing

The proposed drawing currently in this permit attachment is replaced with a new drawing showing the location of the current numbered equipment, 'VALVE, FLANGE, PUMP ID & LOCATION DRAWING'

Hand Drawn Schematic on Graph Paper – This is removed as it has little or no meaning.

Subpart BB Inspection Drawing – This drawing is out of date and is replaced by the previously mentioned Subpart BB drawing. It is removed from the permit.

In addition to the changes referenced above, Safety-Kleen requests that additional changes be made to the Subpart BB inspection requirements as follows:

1. Monitoring potential and actual leaks: To be an 'actual' leak the initial monitoring of a piece of subpart BB equipment with a potential leak must show that there are VOCs at concentration of 10,000 ppm or more at the potential leak point. To reach the 10,000 ppm, a solvent would have to have a vapor pressure of 1.013 kPa. Even at 100° F, Safety-Kleen's most volatile solvent only has a vapor pressure of 0.133 kPa and thus would not register as a subpart BB leak. Because of this, Safety-Kleen requests that instead of having to monitor a potential leak with a photo-ionization detector along with follow-up monitoring, Safety-Kleen be allowed to take a more conservative and protective approach in that Safety-Kleen will repair all visible leaks and record the finding and repair on the Subpart BB inspection record.

2. The numbering of subpart BB fittings: In an EPA response to an inquiry about what 'fittings' have to be tagged, EPA said that only 'flanges' need be tagged, but that all other fittings must still be inspected for leaks. A copy of the EPA Letter to Mr. King is attached. Safety-Kleen proposes that all 'numbered' fittings that are not flanges be removed from the Master List and from the subpart BB drawing.

   Copies of the 'SUBPART BB EQUIPMENT INVENTORY' instructions, master list and subpart bb location drawing that show the changes this request will make are included in the MS Word Tracking Changes format (not the drawing). These changes assume the previous changes requested for these items is approved. A clean version of these items is also included. The Tracking Changes and clean versions of the drawing are labeled RDLN 2. The Tracking Changes Version of the inspection form is labeled clean RDLN 2 and the clean version CLN 2.

Safety-Kleen also requests authorization to remove the vat, piping and valves associated with Safety-Kleen's Continued Use Program since NMED has disallowed the use of this program. The vat and valves would be returned to the Denton DC for use elsewhere in Safety-Kleen's system. A third set of the 'SUBPART BB EQUIPMENT INVENTORY' section of the permit, page 3 of 3 inspection form and Subpart BB Tag location drawing are attached showing these requested changes. The valve and piping configuration after removing the vat and its associated valves and piping may exactly match the attached drawing and master list. Once authorized, an as-built drawing and master list will be provided after the changes have been completed. The tracking changes versions of the inspection form and the Subpart BB location drawing are both labeled RDLN 3. The clean version of the inspection form is labeled CLN 3.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.

In accordance with Class 1 permit modification procedures all parties on the facility mailing list will be notified of the modifications.

If you have any questions or require any additional information please contact me at (402) 630-4261.

Sincerely,

Randy Shaner

Randy Shaner
Environment, Health and Safety Manager
Safety-Kleen Systems Inc.

Attachments

Cc: Branch Files 1020

ATTACHMENT 5
WITH REQUESTED MODIFICATIONS
MS WORD TRACKING CHANGES VERSION

ATTACHMENT 5
INSPECTION PLAN AND SCHEDULE

ATTACHMENT 5

INSPECTION PLAN AND SCHEDULE

5.1 INTRODUCTION

The RCRA inspection program is designed to assure protection of human health and the environment. This is accomplished by the routine examination of permitted units, equipment, and containment structures which, in the event of malfunction or deterioration which is not corrected within a timely manner, could jeopardize the health of persons or affect the environment at the Facility. Inspections are based upon a schedule, which identifies potential or actual non-compliance status of a unit, equipment, or containment structure in a manner that allows the owner/operator adequate time to repair or correct the deficiency found by the inspection.

This attachment provides information on Safety-Kleen Systems Inc., (Safety-Kleen) Farmington, New Mexico Service Center (Facility), as required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(5)) requiring 20.4.1.500 NMAC (incorporating 40 CFR 264.15), and Permit Condition 2.8.

Safety-Kleen personnel shall conduct regular inspections of all equipment and structures to prevent, detect, or respond to environmental or human health hazards. Inspection records shall be kept at the Safety-Kleen Systems Inc., Farmington, New Mexico Service Center administration building for 3 years from the date of the inspection as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.15(d)). The inspections shall cover malfunctions, deteriorations, operator errors, and discharges that may cause or lead to a release of hazardous waste constituents to the environment or may pose a threat to human health.

Facility personnel shall receive general training concerning hazardous waste inspections as part of Safety-Kleen's hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the facility shall receive on-the-job training in inspection procedures. Inspection procedures shall be kept in an operations manual and records of inspections shall be kept in the operating record pursuant to 20.4.1.500 NMAC (Incorporating 40 CFR 264.73(b)(5)).

The Service Center Branch Manager or Designate is responsible for conducting and documenting Facility inspections every operating day in accordance with this Permit. The Branch Manger or designate shall note any repairs that are needed and assure they are completed. If the repairs cannot be implemented by on-site personnel, the Service Center Branch Manager will obtain assistance from outside the branch. Completion of repairs shall also be noted on the inspection record or elsewhere in the Facility Operating Record.

Safety-Kleen employees shall make rounds of the facility each operating day to detect any unauthorized entry to the facility or any other abnormalities. The employees shall

Deleted: , which shall be located on-site in the office of the Branch Manager

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not rely upon inspection checklists entries to make the emergency coordinator aware of spills or other emergencies, but shall immediate verbal notification.

'Operating day' is defined as a day where branch employees load and unload bulk and/or containerized wastes. Operating days are usually Monday through Friday may also include one or more weekend days and/or holidays depending upon operational needs.

5.2 INSPECTION SCHEDULE AND CHECKLIST

Permit Attachment 5-1 contains applicable inspection forms that are used at the Facility. Changes in the format of these inspection records along with additions not required by the permit may be made without a permit modification but the revised forms will be submitted to NMED within 7 days after the form revision. These inspection sheets include records for the daily and weekly 12,000-gallon spent solvent tank inspection, daily Container Storage Unit (CSU) inspection, Facility inspection sheets, and the leak detection and repair record, ensuring that inspections occur at appropriate frequencies. The items to be inspected are placed on the schedule that is appropriate for the frequency of inspection to be performed and/or remedial action taken, with comments. The schedules are maintained and kept at the Facility.

5.2.1 Tank Inspections

The 12,000-gallon above ground storage tank holding the spent solvent shall be inspected each operating day. The inspections include checks of the high level alarm and the volume held in the tank. Sudden deviations in the tank volume will be investigated and the cause determined. If necessary, repairs shall be initiated immediately. The volume of spent solvent shall not exceed 95% of the tank volume at any time. The 12,000-gallon above ground spent solvent storage tank is also inspected for 40 CFR 264 Subpart CC compliance.

The secondary containment for the spent solvent tank is checked for cracks or other deterioration each operating day and for evidence of precipitation or spills every day. Any damage to the spent solvent above ground storage tank or secondary containment shall be noted and repairs initiated. Accumulated liquid discovered in the secondary containment will be removed within 24 hours of discovery or within 24 hours of the end of a precipitation event. Inspection of the secondary containment for the spent solvent tank does not have to be performed on non-operating days when the leak detection system for the secondary containment provides notification of a leak or precipitation buildup within 24 hours. Only the Tank Farm Inspection form page 1 of 3 is required for the weekend inspection of the tank secondary containment, if required. When used, the days of the week may be lined through to write the correct day of the inspection.

5.2.2 Reserved

5.2.3 Container Storage Unit

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Deleted: The solvent dispensing hose, connections, and valves shall be inspected for damage (such as cracks or leaks) and proper functioning on a daily basis. The pumps, pipes, and fittings shall also be checked daily for damage and proper functioning. Any damage to the solvent dispensing equipment shall be noted and repaired. The parts washer solvent dispensing equipment shall also be inspected for 40 CFR 264 Subpart BB compliance.¶

The Container Storage Unit (CSU) area shall be inspected on a daily basis and the number and material condition of the containers shall be noted. The total volume of waste in the CSU shall not exceed ten times the amount that can be collected in the CSU secondary containment system. The contents of any leaking or suspect containers shall be placed in a container of adequate integrity. All containers shall be properly labeled and marked in accordance with U.S. DOT and the New Mexico Hazardous Waste Regulations. The CSU secondary containment system shall be inspected for deterioration or failure. If cracks or leaks are detected during the inspection they shall be repaired immediately. Containers in the CSU shall also be inspected for 40 CFR 264 Subpart CC compliance.

5.2.4 Reserved

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Route Vehicles

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Deleted: Route vehicles shall be inspected daily. The necessary safety equipment shall be on board all route vehicles and shall include radios or cell phones, sorbents, a fire extinguisher, eyewash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses. Any missing equipment shall be replaced immediately.¶

5.2.5 Drum Washer/Dumpsters

The drum washer/dumpster, located in the fill and return station, shall be inspected weekly for leaks and sediment buildup. Any leaks shall be noted and repaired immediately. Excess sediment shall be removed immediately.

5.2.6 Safety Equipment

Fire extinguishers shall be checked weekly to ensure that the units are charged and accessible. The operation of the eye wash station shall be tested weekly. The first aid kits and sorbents (spill kits) shall be inspected weekly for adequate content and accessibility. The list of emergency equipment is located in Attachment 6, *Preparedness and Prevention.*

5.2.7 Security

The operation of each gate and lock shall be checked each operating day. The Facility perimeter fence shall be checked weekly for deterioration.

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ATTACHMENT 5-1
INSPECTION FORMS

Note: The types of waste/product stored in the Container Storage Area may be hand written or typed on the inspection form and these may be changed without requiring a permit modification from or notification to NMED.

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IN[illegible]TION LOG SHEET FOR:
Daily Inspection of **CONTAINER STORAGE AREA**

DESSCRIPTION OF AREA FRONT WAREHOUSE, MAIN BUILDING SOUTH END

PERMITTED STORAGE VOLUME 3820 GALLONS

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

____/____/____	____/____/____	____/____/____	____/____/____	____/____/____
DATE (M/D/Y)	DATE (M/D/Y)	DATE (M/D/Y)	DATE (M/D/Y)	DATE (M/D/Y)
TIME	TIME	TIME	TIME	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 _____ **waste:					
Total Volume of _____ **waste:					
Total Volume of _____ **waste:					
Total Volume of _____ **waste:					
Total Volume of _____ ** :					
Total Volume of _____ ** :					
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Total Volume of _____ ** :					
Total Volume of _____ ** :					
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: _____

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.)

*** A = Acceptable, N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

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(A separate log must be completed for each storage area.)¶

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IN[illegible]TION LOG SHEET FOR:
Daily Inspection of **CONTAINER STORAGE AREA**

DESSCRIPTION OF AREA: FRONT WAREHOUSE, MAIN BUILDING SOUTH END

PERMITTED STORAGE VOLUME 3820 GALLONS

INSPECTOR'S NAME / INITIALS / TITLE

INSPECTOR'S INITIALS				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

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

CONTAINMENT:	MON.	TUES.	WED.	THURS.	FRI.
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": _____

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

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Deleted: * When calculating total volumes, assume the containers are full.¶
** Enter a short description of the waste (e.g., M.S., I.C., paint, etc.) ¶

Daily Inspection of FARMINGTON HAZARDOUS WASTE STORAGE TANK SYSTEM

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS:				
MONDAY	**TUESDAY**	**WEDNESDAY**	**THURSDAY**	**FRIDAY**

____/____/____ ____/____/____ ____/____/____ ____/____/____ ____/____/____

DATE (M / D / Y)

_____ _____ _____ _____ _____

TIME

STORAGE TANKS: 95% Level 13' 5" / 11,400 gallons

(WASTE SOLVENT TANK NOT MORE THAN 95% FULL!)

		MON.		TUES.		WED.		THURS.		FRI.	
Waste Solvent	* Tank (ft & in./gal.)										
Premium Solvent Product	Tank (ft & in./gal.)										
Tank Volume:		A**	N	A	N	A	N	A	N	A	N
Tank Exterior:		A	N	A	N	A	N	A	N	A	N

If 'N', circle appropriate problem: rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other: _____

High Level Alarms:	A	N	A	N	A	N	A	N	A	N

If 'N', circle appropriate problem: malfunctioning "Power On" light, malfunctioning siren/strobe light, other: _____

Volume Gauges:	A	N	A	N	A	N	A	N	A	N

If 'N', circle appropriate problem: disconnected, sticking, condensation, other: _____

CONTAINMENT AREA (Tank Dike)

Any material which spills, leaks or otherwise accumulates in the dike, including rainwater, must be completely removed within 24 hours

Bottoms and Walls:	A	N	A	N	A	N	A	N	A	N

If 'N', circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots, stains, sealant is pitted, cracked, chipped, deterioration, displacement, leaks, other: _____

Rigid Piping and Supports:	A	N	A	N	A	N	A	N	A	N

If 'N', circle appropriate problem: distortion, corrosion, paint failure, leaks, other: _____

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

_____

_____

_____

_____

*** Fill in the Waste Type (e.g. Mineral Spirits)** ****A = Acceptable N = Not Acceptable**

(IF AN ITEM IS NOT APPLICABLE ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/ NOT ACCEPTABLE' ROW)

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Daily Inspection of **FARMINGTON HAZARDOUS WASTE STORAGE TANK SYSTEM**

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INSPECTOR'S NAME / INITIALS / TITLE _____

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INSPECTOR'S INITIALS:				
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: _____										
Hose Body:	A	N	A	N	A	N	A	N	A	N
If 'N', circle appropriate problem: crushed, loose, 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 ANY REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE":

_____

_____

_____

_____

_____

* A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

Daily Inspection of FARMINGTON HAZARDOUS WASTE STORAGE TANK SYSTEM

INSPECTOR'S NAME/ INITIALS / TITLE _____

INSPECTOR'S INITIALS:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE: (M / D / Y) ___/___/___ ___/___/___ ___/___/___ ___/___/___ ___/___/___

TIME Pump, Flange, or Valve number	MON.		TUES.		WED.		THURS.		FRI.	
1 CAMLOCK CAP *	A**	N	A	N	A	N	A	N	A	N
2 FLANGE	A	N	A	N	A	N	A	N	A	N
3 BALL VALVE	A	N	A	N	A	N	A	N	A	N
4 FLANGE	A	N	A	N	A	N	A	N	A	N
5 CHECK VALVE	A	N	A	N	A	N	A	N	A	N
6 FLANGE	A	N	A	N	A	N	A	N	A	N
7 FLANGE	A	N	A	N	A	N	A	N	A	N
8 BALL VALVE	A	N	A	N	A	N	A	N	A	N
9 FLANGE	A	N	A	N	A	N	A	N	A	N
10 EMERGENCY FIRE VALVE	A	N	A	N	A	N	A	N	A	N
11 FLANGE	A	N	A	N	A	N	A	N	A	N
12 PIPE NIPPLE	A	N	A	N	A	N	A	N	A	N
13 PIPE BELL REDUCER	A	N	A	N	A	N	A	N	A	N
14 THREADED PLUG IN TANK WALL	A	N	A	N	A	N	A	N	A	N
15 MANWAY ON SIDE OF TANK	A	N	A	N	A	N	A	N	A	N
16 THREADED PLUG IN TANK WALL	A	N	A	N	A	N	A	N	A	N
17 IN LINE STRAINER	A	N	A	N	A	N	A	N	A	N
18 DIRTY SOLVENT DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
19 CAMLOCK FITTING SUCTION DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
20 CAMLOCK FITTING	A	N	A	N	A	N	A	N	A	N
21 BALL VALVE – DRUM WASHER TO DISCHARGE PUMP	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 BALL VALVE – DRUM WASHER TO RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
25 FLANGE	A	N	A	N	A	N	A	N	A	N
26 AUTOMATIC VALVE – DRUM WASHER TO RECIRCULATING PUMP	A	N	A	N	A	N	A	N	A	N
27 FLANGE	A	N	A	N	A	N	A	N	A	N
28 RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
29 FLANGE – EXIT AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N	A	N	A	N
30 AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N	A	N	A	N
31 FLANGE – INLET TO REUSE VAT AUTOMATIC VALVE	A	N	A	N	A	N	A	N	A	N
32 BALL VALVE – REUSE VAT DRAIN	A	N	A	N	A	N	A	N	A	N
33 BALL VALVE – RECIRC PUMP DISCHARGE	A	N	A	N	A	N	A	N	A	N
34 BALL VALVE – RECIRIC PUMP DISCHARGE TO DRUM WASHER	A	N	A	N	A	N	A	N	A	N
35 BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N
36 BALL VALVE – SUMP SUCTION LINE	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~~

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, does not operate smoothly, 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**

Draw a line through pump and valve I.D. numbers that do not apply

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Deleted: 21

Deleted: 22

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Deleted: 24

Deleted: 26

Deleted: 26

Deleted: 47

Deleted: Auxiliary Pipe

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IN[illegible]TION LOG SHEET FOR:

Weekly Inspection of **SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES AND MISCELLANEOUS EQUIPMENT**

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INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS:

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(SIGN ON THE DAY THE INSPECTION IS PERFORMED; PERFORM INSPECTION ON THE SAME DAY EVERY WEEK.)

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
____/____/____	____/____/____	____/____/____	____/____/____	____/____/____
DATE (M / D / Y)				
_____	_____	_____	_____	_____
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, other: _____

Deleted: wet/dry vacuum,

Eyewash and Shower: A N

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

Communication Devices: A N

If 'N', circle appropriate problem: inadequate supply of telephones, malfunctioning telephones, 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, warning signs, other: _____

Deleted: _____

Deleted: MISCELLANEOUS EQUIPMENT¶
Dry Dumpster: ... [2]

*** Fill in the Waste Type (e.g. Mineral Spirits)** ****A = Acceptable N = Not Acceptable**

(IF AN ITEM IS NOT APPLICABLE ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/ NOT ACCEPTABLE' ROW)

Deleted: EXAMPLE FRONT
EHS #10¶
LEAK DETECTION AND REPAIR RECORD¶
EQUIPMENT I.D. #
... [3]

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~~FIGURE 4~~¶
¶
VISUAL INSPECTION RECORDS¶
¶
Facility: Safety-Kleen Corp. (City): _____¶
¶
A. Visual Inspection Record¶
¶
. (Frequency of Inspections Required by Permit: _____)¶
¶
. Date of storm event observed: _____¶
¶
. Duration of storm event observed: _____¶
¶
. Potential Sources of Storm-Water Contamination Inspected¶
. (List From Worksheet #2)¶
¶
. . . Potential Source . . . . . Inspected (Check if yes)¶
. _____ . . _____¶
. _____ . . _____¶
. _____ . . _____¶
. _____ . . _____¶
. _____ . . _____¶
¶
Storm-Water outfalls (pipes, ditches, channels) inspected¶
¶
. . . Outfall . . . . . Inspected (Check if yes)¶
. _____ . . _____¶
. _____ . . _____¶
. _____ . . _____¶
. _____ . . _____¶
. _____ . . _____¶
¶
Presence of floating and/or suspended material? . . . YES . NO¶
Presence of oil and grease? . . . . . YES . NO¶
Presence of stains or discolorations? . . . . . YES . NO¶
Presence of turbidity or odor? . . . . . YES . NO¶
Any other potential pollutants? . . . . . YES . NO¶
If yes above, describe and explain if possible. Identify each source and ... [4]

Deleted: EXAMPLE **Subpart CC Visual Inspection Checklists**¶
¶
End of Week Container Inspection¶
¶
End of Week Container Inspection – complete this checklist the last day of the ¶ service week when the facility inspection will not be conducted within 24 hours. ¶ This inspection on containers will supplement container inspections completed ¶
during facility inspections during the workweek.¶
¶
Inspector Name: _____Signature: _____¶
¶
Date of Inspection: _____¶
¶
Condition of containers (Circle "A" if the condition of all containers is acceptable; ¶ circle "N" if the condition of one or more containers is not acceptable.)¶
¶
. . . . **A N¶**
¶
If "N", circle appropriate problem: missing or loose lids, missing or incorrect ' or incomplete labels, rust, leaks, distortion, other: _____.¶
¶
Action taken to correct unacceptable condition: ¶
_____¶
¶
¶
. . . **Annual Visual Tank Inspection¶**
¶
Visual Tank Inspection: Complete this inspection once in January and once in July¶
to satisfy the annual inspection required under Subpart CC.¶
¶
Inspector Name: _____ Signature: _____

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~~FIGURE 4~~¶
¶
VISUAL INSPECTION RECORDS¶
¶
Facility: Safety-Kleen Corp. (City):
_____¶
¶
A. Visual Inspection Record¶
¶
. (Frequency of Inspections Required by Permit:
_____)¶
¶
. Date of storm event observed:
_____¶
¶
. Duration of storm event observed:
_____¶
¶
. Potential Sources of Storm-Water Contamination Inspected¶
. (List From Worksheet #2)¶
¶
. . . Potential Source . . . . . Inspected (Check if yes)¶
. _____ . . _____ ___¶
. _____ . . _____ ___¶
. _____ . . _____ ___¶
. _____ . . _____ ___¶
. _____ . . _____ ___¶
¶
Storm-Water outfalls (pipes, ditches, channels) inspected¶
¶
. . . Outfall . . . . . Inspected (Check if yes)¶
. _____ . . _____ ___¶
. _____ . . _____ ___¶
. _____ . . _____ ___¶
. _____ . . _____ ___¶
. _____ . . _____ ___¶
¶
Presence of floating and/or suspended material? . . . YES . NO¶
Presence of oil and grease? . . . . . YES . NO¶
Presence of stains or discolorations? . . . . . YES . NO¶
Presence of turbidity or odor? . . . . . YES . NO¶
Any other potential pollutants? . . . . . YES . NO¶
If yes above, describe and explain if possible. Identify each source and ... [5]

ATTACHMENT 5-2
VAPOR PRESSURE SUMMARY AND SUBPART CC COMPLIANCE

Attachment 5-2, Table 1
Safety-Kleen Solvents
Vapor Pressure Summary
(Isoteniscope Method)

Product Name	Product Number	68° F (20° C)				100° F (38° C)			
		mm-Hg		K Pa		mm-Hg		K Pa	
SK 105 Recycled	6614 (CA) 6617 (Non-CA)	0.4		0.053		1.0		0.133	
SK 105 Virgin	6610	0.81		0.108		1.0		0.133	
SK 150 Premium	6605 6616	0.2		0.0267		0.6		0.08	
Immersion Cleaner	699	<0.4		<0.054		-		-	
Heavy Duty Lacquer Thinner	6782 MSDS	75-94.7 86		10-12.6 11.5		-		-	
Low V.P. Lacquer Thinner	6874	<35		<4.67		-		-	
Bulked Waste Solvent	NA	0.57 Ave 0.96 Max		0.076 0.128		-		-	

(US) Light liquid service > 0.3 KPa @ 20° C

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Deleted: Actrel PC-95 ... [9]

Deleted: 1.45-1.83 ... [10]

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SUBPART CC COMPLIANCE PLAN

Safety-Kleen Systems, Inc.
4210A Hawkins Road
Farmington, New Mexico
NMD980698849

The Safety-Kleen Farmington, New Mexico facility shall control air pollutant emissions from waste management units at this facility pursuant to the requirements of RCRA Subpart CC, through implementation of this compliance plan.

The following plan describes this facility's waste determination procedures, tank and container design/management practices, organic emission controls, inspection and monitoring, and recordkeeping and reporting, pursuant to requirements/standards promulgated under RCRA Subpart CC.

Waste Determination Procedures

For purposes of waste determination, this facility utilizes knowledge developed in the Waste Characterization portion of the Permit. For those hazardous waste which are managed on a transfer basis, and which are not described in the Permit, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

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Based upon this knowledge, it has been determined that all wastes managed in tanks or containers at this facility may display an average volatile organic concentration of greater than 500 ppmw at the point of waste origination. Therefore, all hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

Point of Waste Origination

The point of waste origination for all wastes generated offsite and transported to the site in closed containers, which are subsequently managed in tanks or containers at this facility, is effectively the site boundary at the entrance gate.

For those hazardous wastes generated onsite, the point of waste origination is the point of waste generation, as previously defined in RCRA.

Tanks

Tanks which manage organic wastes at this facility are described in detail in the Permit. Certain features of these units, as they relate to the Subpart CC standards, are described below.

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Waste mineral spirits ASTs are fixed roof, non-pressurized, quiescent tanks. All waste tanks at the facility are Level 1 tanks under Subpart CC. The tank design capacity is less than 75 cubic meters or about 19,813 gallons, and the waste in these tanks exhibits a vapor pressure of less than 76.6 kPa (11.1 psi). The actual vapor pressure of the waste managed in tanks is shown in Attachment 5-2 Table 1. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 265.1084(c)(4). Documentation for the basis of this determination is found in the Waste Characteristics portion of the Permit.

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Deleted: ≈ 0.2 psia. *264.1084(b)(1)(i)(i)*

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These tanks are designed so that all cover openings can be closed with no visible gaps, holes, cracks, or other open spaces into the interior of the tank. The cover and all cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position at all times except when waste is being added to or removed from the tank, or when necessary sampling or repair/maintenance is performed on the tanks.

These tanks are vented to the atmosphere through a safety device (conservation vent) which has been designed to operate with no detectable organic emissions when the device is in the closed position.

The drum washing unit at this facility is a fixed roof, Level 1 tank. This unit is kept closed except when adding or removing wastes, washing drums, sampling, or performing routine maintenance that requires the lid to be open.]

Deleted: In addition, these tanks are designed with a long-bolted manway pressure relief device, which remains in the closed position when not in use to relieve pressure.

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Containers

Containers which manage organic wastes at this facility are described in detail in the Permit. Certain features of these units, as they relate to the Subpart CC regulations, are described below.

Containers managing hazardous wastes at this facility generally fall into three categories. (1) Those hazardous waste containers that are less than 26 gallons in capacity are wholly exempt from consideration under Subpart CC. Safety-Kleen manages waste with vapor pressures greater than 0.3 kPa at 20° C (e.g. lacquer thinner / paint wastes) both in containers less than 0.1 m^3 about 26 gallons and in containers less than 0.46 m^3 or about 122 gallons. Containers of waste that are transferred through the facility are still "in the course of transportation," and therefore are exempt from Subpart CC. (2) Containers with capacities between 26 and 122 gallons are all Level 1 containers, and generally meet the Level 1 standards as covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the containers. In addition, all Safety-Kleen containers used to manage waste meet applicable U.S. DOT regulations on packaging hazardous materials for transportation. (3) Containers with capacities greater than 122 gallons that manage hazardous wastes at this facility are not in light material service (i.e. containers greater than 122 gallons are not used to manage wastes with vapor pressures greater than 0.3 kPa at 20° C). Containers greater than 122 gallons are however, Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container and comply with applicable U.S. DOT regulations on packaging hazardous materials for transportation.

(0.46 m^3 = 121.5 gal; 0.1 m^3 = 26.4 gal; 75 m^3 = 19,812.9 gal)

Inspections and Monitoring

Hazardous wastes accepted from off-site generators are already containerized when the facility accepts the waste. Such containers are visually inspected either at the time they are unloaded for storage or staged for transfer at the facility, or during the daily facility inspection. The inspection occurs within 24 hours of the waste's arrival at the facility. This written plan and schedule to perform the inspections is incorporated in the facility inspection plan by this reference.

An initial visual tank inspection was conducted on August 24, 1992. No defects were noted on the waste solvent tank which could result in air pollutant emissions.

Visual tank inspections shall be conducted on an annual basis.

Recordkeeping

Documentation of tank and tank cover design: See Permit.

Documentation of waste determination: See Attachment 5-2 Table 1.

Records of all visual inspection: See daily facility inspection records.

Listing of all tanks, by unique identifying number, which are difficult or unsafe to inspect: Not applicable at this site.

Results of the determination of the maximum vapor pressure of waste in tanks and record of the tank dimensions and design capacity: See Permit Attachment 5-2 Table 1 and Attachment 1-1.

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Deleted: In addition, containers

Deleted: S-K does not typically manage wastes with vapor pressures greater than 0.3 kPa at 20° C in containers with capacities between 26 and 122 gallons. Non-typical wastes that may be received in containers between 26 and 122 gallons and have vapor pressures that are greater than 0.3 kPa at 20° C, are managed "in the course of transportation" and are exempt from Subpart CC, as described in 1) above.

Deleted:

Deleted: . In addition, all Safety-Kleen containers used to manage wastes

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Deleted: Tanks No. _____

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Deleted: Waste Characteristics portion of the Operation Plan/Permit

Deleted: , and enclosed record of initial tank inspection

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Subpart CC Visual Inspection Checklists

End of Week Container Inspection

End of Week Container Inspection – complete this checklist the last day of the service week when the facility inspection will not be conducted within 24 hours. This inspection on containers will supplement container inspections completed during facility inspections during the workweek.

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Condition of containers (Circle "A" if the condition of all containers is acceptable; circle "N" if the condition of one or more containers is not acceptable.)

A N

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

Action taken to correct unacceptable condition: _____

Annual Visual Tank Inspection

Visual Tank Inspection - Complete this inspection once each year to satisfy the annual inspection required under Subpart CC.

Deleted: in January and once in July

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Defects Noted: _____

Action taken to correct unacceptable condition: _____

Tank Inspection difficult or unsafe: _____

ATTACHMENT 5-3
EQUIPMENT INVENTORY FOR INSPECTIONS

SUBPART BB EQUIPMENT INVENTORY

Listed on the attached master list is all equipment at the facility which is subject to the requirements of 40 CFR 264 and 265, Subpart BB. The numbered equipment is also identified on the attached Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste tank system is spent mineral spirits containing one or more of the following waste codes: D001, D004-D011, D018, D019, D021-D030 and D032-Do43. Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic but may contain water. The vapor pressure of the bulked spent mineral spirits at 60° F is provided in Attachment 5-2, Table 1, is less than 0.3 kPa at 20° C and is thus defined as heavy liquid under the cited regulations.

NA – ~~Equipment associated with the waste antifreeze tanks(s) is also in heavy liquid service. Ethylene glycol has a vapor pressure at 68° F of .08 mm Hg or 0.01 kPa and is usually 100% organic.~~

Compliance with the standard (264.1058) will be achieved through daily facility inspections, and if required, leak repair. The facility inspection record has been updated to include a detailed daily equipment inspection. Records of equipment repair are maintained on the subpart BB tank inspection record. No monitoring is required as Safety-Kleen solvents have such a low vapor pressure that at no time will the vapor around a visible leak be at or above 10,000 ppm VOC as measured via test methods specified in the regulations. A vapor pressure of 1.015 kPa or 7.6 mm Hg is necessary to produce a reading of 10,000 ppm and to define a leak as a subpart bb leak. Safety-Kleen takes the conservative approach and fixes all potential subpart bb leaks found in the waste solvent tank system and is not required to conduct monitoring of potential leaks. This is more protective of human health and the environment than the regulations.

Leak Detection and Repair Record

After detection of a potential leak, a pump or valve must be repaired to repair the leaking item. Identification of the leak and its repair are noted on the facility inspection record for the Waste Solvent Tank System, page 3 of 3.

Deleted: TO BE FILLED OUT AT THE BRANCH AND KEPT IN THE OPERATING RECORD (FILE 1070) WITH THE SITE PLAN AND PUMP AND VALVE LIST¶

Deleted: pump list and valve

Deleted:

Deleted: site plan

Deleted: management unit(s)

Deleted: ((

Deleted:)

Deleted: 0.27 kPa (equivalent to 2 mm Hg – see MSDS and the attached EPA guidance document page)

Deleted: . The waste stream has a vapor pressure equal or lower than that of the clean mineral spirits due to contamination during use with oil, grease and sediment and it is in a liquid state at the equipment, so all equipment is in contact with materials

Deleted: detection monitoring and

Deleted: monitoring and

Deleted: a separate form in the operating

Deleted: 2. Revised Facility Inspection Record¶
¶
An additional page has been added to the facility inspection record (file 1210) for the daily inspection of equipment. You should begin using it on December 21, 1990. If a potential leak is discovered (by visual evidence or excessive odor) note it as "N" on the form and follow procedures in #3 below.¶
¶
3.

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Deleted: monitored with a photoionizer-type instrument within five days. If the instrument reading is 10,000 ppm or greater, a leak is confirmed and a repair must be made within 15 days. Contact your Regional Environmental Engineer immediately to arrange for the equipment to be monitored by a local environmental consultant

Deleted: The third form must only be completed for each potential or actual leak detected. The piece of equipment must be tagged with the I.D. number, date of potential or actual leak detection and date of leak confirmation. Tags may be obtained from Tech. Services. After a valve has been repaired, it must be monitored monthly by a consultant using a photoionization detector. After two successive months with no leak detection, the identification may be removed and monitoring discontinued. For other equipment, such as pumps, the tag may be removed after a successful repair. This form must be kept in a new file (1220.2 – Leak Detection and Repair Record).¶

Deleted: DATE 03-07-91 ¶
. . . . . PUMP
LIST . . . BRANCH # 7-008-21 ¶
. . . . . PREPARER
'S¶
. . . **HAZARDOUS WASTE – HEAVY**
LIQUID . . . . . SIGNATURE
. . . . . ¶
PUMP NUMBER ... [12]

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DATE 12-16-2009

MASTER LIST

BRANCH # 7-008-21

PREPARER'S SIGNATURE

HAZARDOUS WASTE – HEAVY LIQUID

INDIVIDUAL NUMBER	TYPE	HAZARDOUS WASTE MANAGEMENT UNIT	GENERAL LOCATION *
1	CAMLOCK CAP	TANK FARM	TANKER ACCESS BOX
2	FLANGE	TANK FARM	TANKER ACCESS BOX
3	BALL VALVE	TANK FARM	TANKER ACCESS BOX
4	FLANGE	TANK FARM	TANKER ACCESS BOX
5	CHECK VALVE	TANK FARM	TANKER ACCESS BOX
6	FLANGE	TANK FARM	TANKER ACCESS BOX
7	FLANGE	TANK FARM	BOTTOM OUTLET TANK
8	BALL VALVE	TANK FARM	BOTTOM OUTLET TANK
9	FLANGE	TANK FARM	BOTTOM OUTLET TANK
10	EMERGENCY FIRE VALVE	TANK FARM	BOTTOM OUTLET TANK
11	FLANGE	TANK FARM	BOTTOM OUTLET TANK
12	PIPE NIPPLE	TANK FARM	BOTTOM OUTLET TANK
13	PIPE BELL REDUCER	TANK FARM	BOTTOM OUTLET TANK
14	THREADED PLUG	TANK FARM	TANK SIDE BY OUTLET PIPING
15	SIDE MANWAY	TANK FARM	TANK SIDE AT BOTTOM
16	THREADED PLUG	TANK FARM	TANK SIDE BY BOTTOM MANWAY
17	IN LINE STRAINER	TANK FARM	TANK FARM SECONDARY CONTAINMENT
18	DIRTY SOLVENT DISCHARGE PUMP	TANK FARM	UNDER RETURN & FILL GRATE
19	CAMLOCK FITTING	TANK FARM	UNDER RETURN & FILL GRATE
20	CAMLOCK FITTING	TANK FARM	UNDER RETURN & FILL GRATE
21	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
22	NOT USED	NA	NA
23	NOT USED	NA	NA
24	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
25	FLANGE	TANK FARM	UNDER RETURN & FILL GRATE
26	AUTOMATIC VALVE	TANK FARM	UNDER RETURN & FILL GRATE
27	FLANGE	TANK FARM	UNDER RETURN & FILL GRATE
28	RECIRCULATION PUMP	TANK FARM	UNDER RETURN & FILL GRATE
29	FLANGE	TANK FARM	UNDER RETURN & FILL GRATE
30	AUTOMATIC VALVE	TANK FARM	UNDER RETURN & FILL GRATE
31	FLANGE	TANK FARM	UNDER RETURN & FILL GRATE
32	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
33	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
34	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
35	BALL VALVE, SUMP SUCTION	TANK FARM	UNDER RETURN & FILL GRATE
36	BALL VALVE, SUMP SUCTION	TANK FARM	UNDER RETURN & FILL GRATE
RETURN & FILL**	NON-FLANGE FITTINGS	TANK FARM	UNDER RETURN & FILL GRATE
TANK FARM ***	NON-FLANGE FITTINGS	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT AREA

* See Subpart BB drawing for more specific locations.

** All non-flanged fittings under the Return & Fill grating except the drip pan drain

*** All non-flanged fittings in the waste solvent tank farm secondary containment area are marked with brown color or are connected to piping that marked with brown color.

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VALVE, FLANGE, PUMP ID & LOCATION DRAWING

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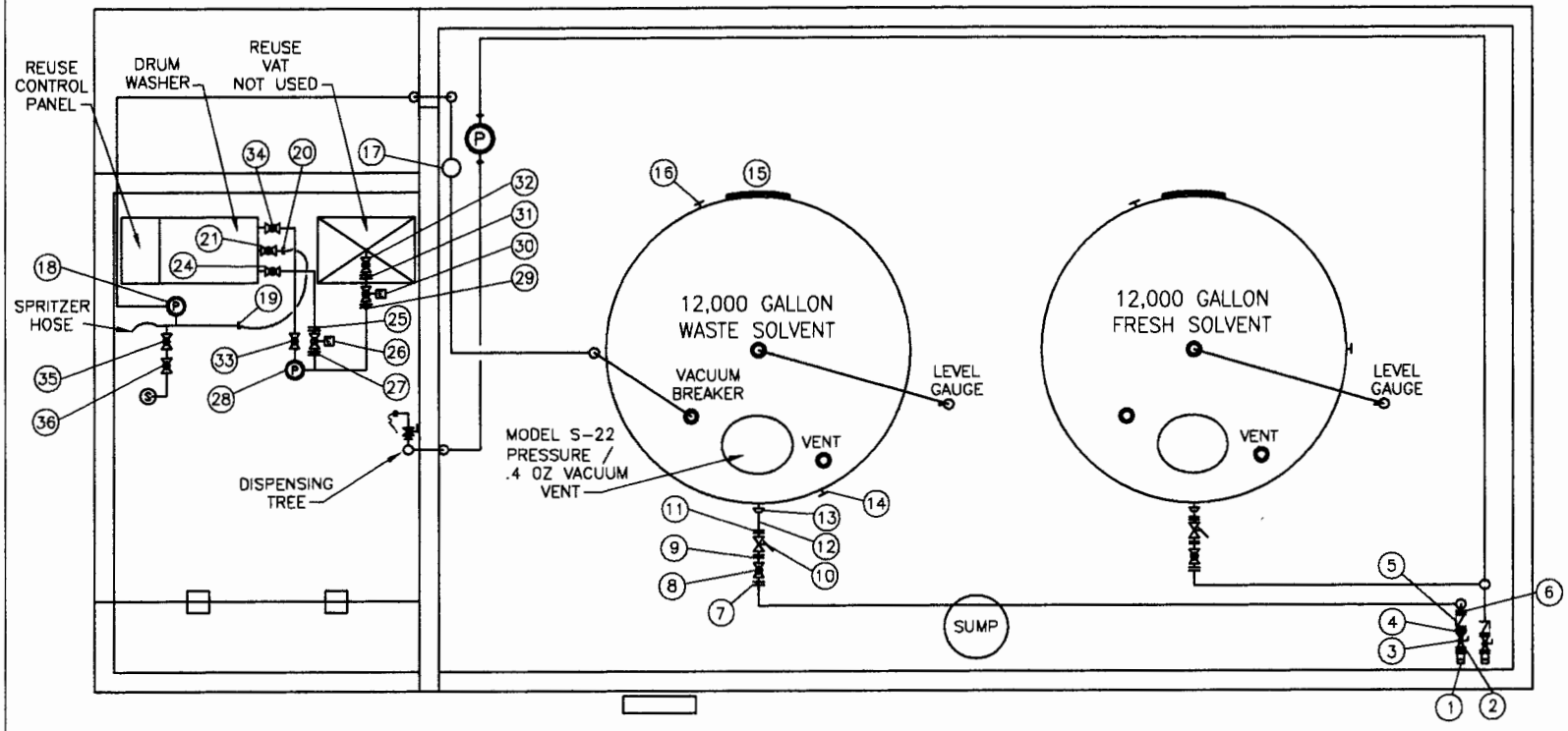

SYMBOL LIST

	CAMLOC COUPLING
	BALL VALVE
	INTERNAL EMERGENCY VALVE
	CHECK VALVE
	STRAINER
	PUMP
	REDUCER
	FLANGE
	AUTOMATIC (ELECTRONIC) BALL VALVE

GENERAL NOTES

1. PIPING AND TAGGING FIELD VERIFIED ON 12-16-99 BY S-K.

PROPRIETARY STATEMENT

THIS DRAWING IS THE EXCLUSIVE PROPERTY OF SAFETY-KLEEN SYSTEMS, INC. AND IS PROPRIETARY AND CONFIDENTIAL INFORMATION. THIS DRAWING AND THE INFORMATION CONTAINED THEREIN MUST NOT BE DUPLICATED, USED, DIVULGED, REPRODUCED, COPIED, DISCLOSED OR APPROPRIATED IN WHOLE OR IN PART FOR ANY PURPOSE OTHER THAT AS EXPRESSLY AUTHORIZED BY SAFETY-KLEEN SYSTEMS, INC. THIS DRAWING MUST BE RETURNED PROMPTLY UPON REQUEST.

FITTING SCHEDULE

1	CAMLOCK CAP	19	CAMLOCK FITTING DISCH. PUMP SUCTION
2	FLANGE	20	CAMLOCK FITTING
3	BALL VALVE	21	BALL VALVE D.V. TO DISCHARGE PUMP
4	FLANGE	22	NOT USED
5	CHECK VALVE	23	NOT USED
6	FLANGE	24	BALL VALVE D.V. TO RECIRC. PUMP
7	FLANGE	25	FLANGE
8	BALL VALVE	26	AUTOMATIC VALVE D.V. TO RECIRC. PUMP
9	FLANGE	27	FLANGE
10	EMERGENCY FIRE VALVE	28	RECIRCULATION PUMP
11	FLANGE	29	FLANGE- EXIT AUTO VALVE FROM REUSE VAT
12	PIPE NIPPLE	30	AUTOMATIC VALVE FROM REUSE VAT
13	PIPE BELL REDUCER	31	FLANGE INLET AUTO VALVE TO REUSE VAT
14	THREADED PLUG IN TANK WALL	32	BALL VALVE REUSE VAT DRAIN
15	SIDE MANWAY	33	BALL VALVE RECIRC. PUMP DISCHARGE
16	THREADED PLUG IN TANK WALL	34	BALL VALVE RECIRC. PUMP TO DRUM WASHER
17	IN LINE STRAINER	35	BALL VALVE R/F SUMP SUCTION LINE
18	DIRTY SOLVENT DISCHARGE PUMP	36	BALL VALVE R/F SUMP SUCTION LINE

N

0' 3' 10' 25'
1' 5' 15'

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	REVISED PER COMMENTS	JEK	RS	RS	12/20/99
0	ISSUED FOR REVIEW	JEK	RS	RS	12/17/99

REVISIONS

TITLE: TANK FARM – R/F PART BB TAGGING PLAN

SAFETY-KLEEN SYSTEMS, INC.
2400 LUCKY DR. CLUSTER H, BLDG.3 PLANO, TX 75024
PHONE: 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1/2"=1'	JEK	RS	RS	RS	12/17/99

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
FARMINGTON, N.M.	7133-4100-350	A

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- ¶
IT LOOKS LIKE IT COULD BE A HAND DRAWN MAP OF WHERE SUBPART BB TAGS ARE LOCATED¶

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4210A HAWKINGS RD.¶
FARMINGTON, UT¶
¶
This is a site drawing of both the hazardous waste tank system and the used oil tank system with a general location of tanks, pipes, valves and pumps but with no subpart

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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 ANY REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

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EXAMPLE FRONT EHS #10

LEAK DETECTION AND REPAIR RECORD

EQUIPMENT I.D. # _____ **BRANCH #** _____

DESCRIPTION _____

	DATE	**INSPECTOR'S SIGNATURE**
HOW WAS THE POTENTIAL OR ACTUAL LEAK DETECTED? _____	_____	_____
DESCRIBE THE POTENTIAL OR ACTUAL LEAK: _____		
INSTRUMENT MONITORING WITHIN FIVE DAYS (1.) RESULTS _____	_____	_____
REPAIR ATTEMPT METHOD _____ (2.) RESULTS _____	_____	_____
REPAIR ATTEMPT METHOD _____ (3.) RESULTS _____	_____	_____
DATE OF SUCCESSFUL REPAIR (must be completed within 15 days) METHOD _____ (4.) RESULTS _____	_____	_____

FOLLOWUP MONTHLY MONITORING FOR VALVES
(5.) RESULTS

_____ _____ _____

(6.) RESULTS

_____ _____ _____

MONITORING SUMMARY

(REFERENCE NUMBER – SEE ABOVE)

	(1)	(2)	(3)	(4)	(5)	(
INSTRUMENT # / OPERATOR	____	____	____	____	____	__
CALIBRATION	____	____	____	____	____	__
BACKGROUND READING	____	____	____	____	____	__
READING AT EQUIPMENT	____	____	____	____	____	__
LEAK DETECTED?	____	____	____	____	____	__

ATTACH ANY DOCUMENTATION PREPARED BY THE CONSULTANT

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EXAMPLE
~~FIGURE 4~~

VISUAL INSPECTION RECORDS

Facility: Safety-Kleen Corp. (City):

_____

A. Visual Inspection Record

(Frequency of Inspections Required by Permit:
_____)

Date of storm event observed:

_____

Duration of storm event observed:

_____

Potential Sources of Storm-Water Contamination Inspected
(List From Worksheet #2)

Potential Source Inspected (Check if yes)

_____

_____

Storm-Water outfalls (pipes, ditches, channels) inspected

Outfall	Inspected (Check if yes)

Presence of floating and/or suspended material?	YES	NO
Presence of oil and grease?	YES	NO
Presence of stains or discolorations?	YES	NO
Presence of turbidity or odor?	YES	NO
Any other potential pollutants?	YES	NO

If yes above, describe and explain if possible. Identify each source and/or outfall where pollutants were observed:

Inspector's Name:

Date:

EXAMPLE

~~FIGURE~~ 4

VISUAL INSPECTION RECORDS

Facility: Safety-Kleen Corp. (City):

_____

A. Visual Inspection Record

(Frequency of Inspections Required by Permit:
_____)

Date of storm event observed:

_____

Duration of storm event observed:

_____

Potential Sources of Storm-Water Contamination Inspected
(List From Worksheet #2)

Potential Source	Inspected (Check if yes)
_____	
_____	
_____	
_____	
_____	
_____	
_____	
_____	
_____	
_____	

Storm-Water outfalls (pipes, ditches, channels) inspected

Outfall	Inspected (Check if yes)
_____	
_____	
_____	
_____	
_____	
_____	
_____	
_____	

_____

_____

Presence of floating and/or suspended material?	YES	NO
Presence of oil and grease?	YES	NO
Presence of stains or discolorations?	YES	NO
Presence of turbidity or odor?	YES	NO
Any other potential pollutants?	YES	NO

If yes above, describe and explain if possible. Identify each source and/or outfall where pollutants were observed:

_____

_____

_____

Inspector's Name:

_____

Date:

_____

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DATE 03-07-91

PUMP LIST

BRANCH # 7-008-21

PREPARER'S

HAZARDOUS WASTE – HEAVY LIQUID

SIGNATURE _____

PUMP NUMBER	PUMP DESCRIPTION	HAZARDOUS WAS MANAGEMENT U
4	RECIRCULATING PUMP	SPENT SOLVENT STORAGE TANK
5	TRASH RETURN PUMP	SPENT SOLVENT STORAGE TANK

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VALVE LIST

BRANCH # 7-008-21

PREPARER'S

HAZARDOUS WASTE – HEAVY LIQUID

SIGNATURE _____

VALVE SIZE	INDIVIDUAL VALVE NUMBER	VALVE TYPE	HAZARDOUS WASTE MANAGEM
1 ½"	44	BALL VALVE	ON/OFF DISCHARGE SIDE OF RECIRCULAT. SIDE BARREL WASHER
2"	26	BALL VALVE	ON/OFF SUCTION SIDE TRASH PUMP CENTI WASHER
3"	18	INTERNAL VALVE	INTERNAL EMERGENCY VALVE (UPPER PC TANK PICK-UP BOTTOM CENTER
3"	19	GATE VALVE	GATE VALVE (LOWER POSITION) (NONLOC PICK-UP BOTTOM/CENTER/FRONT
3"	22	SWING GATE VALVE	SWING CHECK VALVE WASTE TANK PICK- CONNECTION SE CORNER OF CONTAINME
3"	23	LOCKING GATE VALVE	LOCKING GATE VALVE WASTE TANK PICK CONNECTION SE CORNER OF CONTAINME

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DATE 03-07-91

FLANGE LIST

BRANCH # 7-008-21

PREPAER'S

HAZARDOUS WASTE – HEAVY LIQUID

SIGNATURE _____

FLANGE SIZE	INDIVIDUAL FLANGE NUMBER	FLANGE TYPE	HAZARDOUS WASTE MANAGEME
1 ½"	45	UNION	DISCHARGE SIDE OF RECIRCULATING PU BARREL, WASHER RIGHT SIDE
1 ½"	43	UNION	DISCHARGE SIDE OF RECIRCILATING PU SIDE OF BARREL WASHER
1 ½"	42	UNION	DISCHARGE SIDE OF RECIRCULATIN PUM RIGHT SIDE OF BARREL WASHER
2"	46	UNION	SUCTION SIDE RECIRCULATING PUMP LO SIDE OF BARREL WASHER
2"	14	FLANGE/UNION	DISCHARGE SIDE OF TRASH PUMP LOWE OF BARREL WASHER
3"	20	FLANGE	OPTIONAL/UNION WASTE TANK PICK-UP BOTTOM/CENTER/FRONT
3"	21	FLANGE	OPTIONAL/UNION WASTE TANK PICK-UP CONNECTION SE CORNER OF CONTAINM
1"	3	SWING VALVE	SWING VALVE CUT-OFF FOR DRIP CAN C

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UNION

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DISCHARGE SIDE OF RECIRCULATING PUMP INSIDE BARREL, WASHER RIGHT SIDE

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Refer to site plan

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BALL VALVE

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ON/OFF DISCHARGE SIDE OF RECIRCULATING PUMP MID RIGHT SIDE BARREL WASHER

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1 ½"

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UNION

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DISCHARGE SIDE OF RECIRCILATING PUMP MID RIGHT SIDE OF BARREL WASHER

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	UNION	
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DISCHARGE SIDE OF RECIRCULATIN PUMP LOWER RIGHT SIDE OF BARREL WASHER		
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	PUMP	
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RECIRCULATING PUMP LOWER RIGHT SIDE OF BARREL WASHER		
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	2"	
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	46	
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	UNION	
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SUCTION SIDE RECIRCULATING PUMP LOWER RIGHT SIDE OF BARREL WASHER		
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	BALL VALVE	
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ON/OFF SUCTION SIDE TRASH PUMP CENTER UNDER BARREL WASHER		
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	PUMP	
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TRASH PUMP LOWER LEFT FRONT OF BARREL WASHER		
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FLANGE/UNION

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DISCHARGE SIDE OF TRASH PUMP LOWER LEFT FRONT OF BARREL WASHER

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2"

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BALL VALVE

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ON/OFF SUCTION SIDE OF TRASH PUMP FOR SUMP LOWER LEFT SIDE OF PUMP

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INTERNAL VALVE

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INTERNAL EMERGENCY VALVE (UPPER POSITION) WASTE TANK PICK-UP BOTTOM CENTER

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GATE VALVE

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GATE VALVE (LOWER POSITION) (NONLOCKING) WASTE TANK PICK-UP BOTTOM/CENTER/FRONT

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FLANGE

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OPTIONAL/UNION WASTE TANK PICK-UP BOTTOM/CENTER/FRONT

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3"

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FLANGE

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OPTIONAL/UNION WASTE TANK PICK-UP AT TANKER CONNECTION SE CORNER OF CONTAINMENT

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3"

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SWING GATE VALVE

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LOCKING GATE VALVE

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LOCKING GATE VALVE WASTE TANK PICK-UP AT TANER CONNECTION SE CORNER OF CONTAINMENT

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ATTACHMENT 5
WITH REQUESTED MODIFICATIONS
CLEAN VERSION

ATTACHMENT 5

INSPECTION PLAN AND SCHEDULE

ATTACHMENT 5

INSPECTION PLAN AND SCHEDULE

5.1 INTRODUCTION

The RCRA inspection program is designed to assure protection of human health and the environment. This is accomplished by the routine examination of permitted units, equipment, and containment structures which, in the event of malfunction or deterioration which is not corrected within a timely manner, could jeopardize the health of persons or affect the environment at the Facility. Inspections are based upon a schedule, which identifies potential or actual non-compliance status of a unit, equipment, or containment structure in a manner that allows the owner/operator adequate time to repair or correct the deficiency found by the inspection.

This attachment provides information on Safety-Kleen Systems Inc., (Safety-Kleen) Farmington, New Mexico Service Center (Facility), as required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(5)) requiring 20.4.1.500 NMAC (incorporating 40 CFR 264.15), and Permit Condition 2.8.

Safety-Kleen personnel shall conduct regular inspections of all equipment and structures to prevent, detect, or respond to environmental or human health hazards. Inspection records shall be kept at the Safety-Kleen Systems Inc., Farmington, New Mexico Service Center administration building for 3 years from the date of the inspection as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.15(d)). The inspections shall cover malfunctions, deteriorations, operator errors, and discharges that may cause or lead to a release of hazardous waste constituents to the environment or may pose a threat to human health.

Facility personnel shall receive general training concerning hazardous waste inspections as part of Safety-Kleen's hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the facility shall receive on-the-job training in inspection procedures. Inspection procedures shall be kept in an operations manual and records of inspections shall be kept in the operating record pursuant to 20.4.1.500 NMAC (Incorporating 40 CFR 264.73(b)(5)).

The Service Center Branch Manager or Designate is responsible for conducting and documenting Facility inspections every operating day in accordance with this Permit. The Branch Manger or designate shall note any repairs that are needed and assure they are completed. If the repairs cannot be implemented by on-site personnel, the Service Center Branch Manager will obtain assistance from outside the branch. Completion of repairs shall also be noted on the inspection record or elsewhere in the Facility Operating Record.

Safety-Kleen employees shall make rounds of the facility each operating day to detect any unauthorized entry to the facility or any other abnormalities. The employees shall

not rely upon inspection checklists entries to make the emergency coordinator aware of spills or other emergencies, but shall immediate verbal notification.

'Operating day' is defined as a day where branch employees load and unload bulk and/or containerized wastes. Operating days are usually Monday through Friday may also include one or more weekend days and/or holidays depending upon operational needs.

5.2 INSPECTION SCHEDULE AND CHECKLIST

Permit Attachment 5-1 contains applicable inspection forms that are used at the Facility. Changes in the format of these inspection records along with additions not required by the permit may be made without a permit modification but the revised forms will be submitted to NMED within 7 days after the form revision. These inspection sheets include records for the daily and weekly 12,000-gallon spent solvent tank inspection, daily Container Storage Unit (CSU) inspection, Facility inspection sheets, and the leak detection and repair record, ensuring that inspections occur at appropriate frequencies. The items to be inspected are placed on the schedule that is appropriate for the frequency of inspection to be performed and/or remedial action taken, with comments. The schedules are maintained and kept at the Facility.

5.2.1 Tank Inspections

The 12,000-gallon above ground storage tank holding the spent solvent shall be inspected each operating day. The inspections include checks of the high level alarm and the volume held in the tank. Sudden deviations in the tank volume will be investigated and the cause determined. If necessary, repairs shall be initiated immediately. The volume of spent solvent shall not exceed 95% of the tank volume at any time. The 12,000-gallon above ground spent solvent storage tank is also inspected for 40 CFR 264 Subpart CC compliance.

The secondary containment for the spent solvent tank is checked for cracks or other deterioration each operating day and for evidence of precipitation or spills every day. Any damage to the spent solvent above ground storage tank or secondary containment shall be noted and repairs initiated. Accumulated liquid discovered in the secondary containment will be removed within 24 hours of discovery or within 24 hours of the end of a precipitation event. Inspection of the secondary containment for the spent solvent tank does not have to be performed on non-operating days when the leak detection system for the secondary containment provides notification of a leak or precipitation buildup within 24 hours. Only the Tank Farm Inspection form page 1 of 3 is required for the weekend inspection of the tank secondary containment, if required. When used, the days of the week may be lined through to write the correct day of the inspection.

5.2.2 Reserved

5.2.3 Container Storage Unit

The Container Storage Unit (CSU) area shall be inspected on a daily basis and the number and material condition of the containers shall be noted. The total volume of waste in the CSU shall not exceed ten times the amount that can be collected in the CSU secondary containment system. The contents of any leaking or suspect containers shall be placed in a container of adequate integrity. All containers shall be properly labeled and marked in accordance with U.S. DOT and the New Mexico Hazardous Waste Regulations. The CSU secondary containment system shall be inspected for deterioration or failure. If cracks or leaks are detected during the inspection they shall be repaired immediately. Containers in the CSU shall also be inspected for 40 CFR 264 Subpart CC compliance.

5.2.4 Reserved

5.2.5 Drum Washer/Dumpsters

The drum washer/dumpster, located in the fill and return station, shall be inspected weekly for leaks and sediment buildup. Any leaks shall be noted and repaired immediately. Excess sediment shall be removed immediately.

5.2.6 Safety Equipment

Fire extinguishers shall be checked weekly to ensure that the units are charged and accessible. The operation of the eye wash station shall be tested weekly. The first aid kits and sorbents (spill kits) shall be inspected weekly for adequate content and accessibility. The list of emergency equipment is located in Attachment 6, *Preparedness and Prevention.*

5.2.7 Security

The operation of each gate and lock shall be checked each operating day. The Facility perimeter fence shall be checked weekly for deterioration.

ATTACHMENT 5-1
INSPECTION FORMS

Note: The types of waste/product stored in the Container Storage Area may be hand written or typed on the inspection form and these may be changed without requiring a permit modification from or notification to NMED.

INSPECTION LOG SHEET FOR:
Daily Inspection of **CONTAINER STORAGE AREA**

DESSCRIPTION OF AREA : FRONT WAREHOUSE, MAIN BUILDING SOUTH END

PERMITTED STORAGE VOLUME 3820 GALLONS

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

____/____/____	____/____/____	____/____/____	____/____/____	____/____/____
DATE (M/D/Y)	DATE (M/D/Y)	DATE (M/D/Y)	DATE (M/D/Y)	DATE (M/D/Y)
_____	_____	_____	_____	_____
TIME	TIME	TIME	TIME	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 _____ **waste:					
Total Volume of _____ **waste:					
Total Volume of _____ **waste:					
Total Volume of _____ **waste:					
Total Volume of _____ ** :					
Total Volume of _____ ** :					
Total Volume of _____ ** :					
Total Volume of _____ ** :					
Total Volume of _____ ** :					
Total Volume of _____ ** :					
Total Volume of _____ ** :					
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: _____

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.)

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

INSPECTION LOG SHEET FOR:
Daily Inspection of **CONTAINER STORAGE AREA**

DESSCRIPTION OF AREA: FRONT WAREHOUSE, MAIN BUILDING SOUTH END

PERMITTED STORAGE VOLUME 3820 GALLONS

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

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

CONTAINMENT:	MON.	TUES.	WED.	THURS.	FRI.
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": _____

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

INSPECTION LOG SHEET FOR:

Daily Inspection of **FARMINGTON HAZARDOUS WASTE STORAGE TANK SYSTEM**

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS:				
MONDAY	**TUESDAY**	**WEDNESDAY**	**THURSDAY**	**FRIDAY**

_____/_____/_____ _____/_____/_____ _____/_____/_____ _____/_____/_____ _____/_____/_____

DATE: (M / D / Y)

_____ _____ _____ _____ _____

TIME

STORAGE TANKS: 95% Level 13' 5" / 11,400 gallons

(WASTE SOLVENT TANK NOT MORE THAN 95% FULL!)

	MON.		TUES.		WED.		THURS.		FRI.	
_Waste Solvent_____ * Tank (ft & in./gal.)										
_Premium Solvent Product___ Tank (ft & in./gal.)										
Tank Volume:	A**	N	A	N	A	N	A	N	A	N
Tank Exterior:	A	N	A	N	A	N	A	N	A	N
High Level Alarms:	A	N	A	N	A	N	A	N	A	N
Volume Gauges:	A	N	A	N	A	N	A	N	A	N

If 'N', circle appropriate problem: rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other: _____

If 'N', circle appropriate problem: malfunctioning "Power On" light, malfunctioning siren/strobe light, other: _____

If 'N', circle appropriate problem: disconnected, sticking, condensation, other: _____

CONTAINMENT AREA (Tank Dike)

Any material which spills, leaks or otherwise accumulates in the dike, including rainwater, must be completely removed within 24 hours

Bottoms and Walls:	A	N	A	N	A	N	A	N	A	N
Rigid Piping and Supports:	A	N	A	N	A	N	A	N	A	N

If 'N', circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots, stains, sealant is pitted, cracked, chipped, deterioration, displacement, leaks, other: _____

If 'N', circle appropriate problem: distortion, corrosion, paint failure, leaks, other: _____

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

*** Fill in the Waste Type (e.g. Mineral Spirits)** ****A = Acceptable N = Not Acceptable**

(IF AN ITEM IS NOT APPLICABLE ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/ NOT ACCEPTABLE' ROW)

INSPECTION LOG SHEET FOR:
Daily Inspection of **FARMINGTON HAZARDOUS WASTE STORAGE TANK SYSTEM**

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S INITIALS:				
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: _____										
Hose Body:	A	N	A	N	A	N	A	N	A	N
If 'N', circle appropriate problem: crushed, loose, 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 ANY REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE":

_____

_____

_____

_____

_____

* A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE ENTER 'NA' AFTER IT AND DRAW A LINE THROUGH THE ACCEPTABLE NOT ACCEPTABLE ROW)

INSPECTION LOG SHEET FOR:

Daily Inspection of **FARMINGTON HAZARDOUS WASTE STORAGE TANK SYSTEM**

INSPECTOR'S NAME/ INITIALS / TITLE _____

INSPECTOR'S INITIALS:				
MONDAY	**TUESDAY**	**WEDNESDAY**	**THURSDAY**	**FRIDAY**
___/___/___	___/___/___	___/___/___	___/___/___	___/___/___

DATE: (M / D / Y)

TIME Pump, Flange, or Valve number		MON.		TUES.		WED.		THURS.		FRI.	
1	CAMLOCK CAP *	A**	N	A	N	A	N	A	N	A	N
2	FLANGE	A	N	A	N	A	N	A	N	A	N
3	BALL VALVE	A	N	A	N	A	N	A	N	A	N
4	FLANGE	A	N	A	N	A	N	A	N	A	N
5	CHECK VALVE	A	N	A	N	A	N	A	N	A	N
6	FLANGE	A	N	A	N	A	N	A	N	A	N
7	FLANGE	A	N	A	N	A	N	A	N	A	N
8	BALL VALVE	A	N	A	N	A	N	A	N	A	N
9	FLANGE	A	N	A	N	A	N	A	N	A	N
10	EMERGENCY FIRE VALVE	A	N	A	N	A	N	A	N	A	N
11	FLANGE	A	N	A	N	A	N	A	N	A	N
12	PIPE NIPPLE	A	N	A	N	A	N	A	N	A	N
13	PIPE BELL REDUCER	A	N	A	N	A	N	A	N	A	N
14	THREADED PLUG IN TANK WALL	A	N	A	N	A	N	A	N	A	N
15	MANWAY ON SIDE OF TANK	A	N	A	N	A	N	A	N	A	N
16	THREADED PLUG IN TANK WALL	A	N	A	N	A	N	A	N	A	N
17	IN LINE STRAINER	A	N	A	N	A	N	A	N	A	N
18	DIRTY SOLVENT DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
19	CAMLOCK FITTING SUCTION DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
20	CAMLOCK FITTING	A	N	A	N	A	N	A	N	A	N
21	BALL VALVE – DRUM WASHER TO DISCHARGE PUMP	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	BALL VALVE – DRUM WASHER TO RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
25	FLANGE	A	N	A	N	A	N	A	N	A	N
26	AUTOMATIC VALVE – DRUM WASHER TO RECIRCULATING PUMP	A	N	A	N	A	N	A	N	A	N
27	FLANGE	A	N	A	N	A	N	A	N	A	N
28	RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
29	FLANGE – EXIT AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N	A	N	A	N
30	AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N	A	N	A	N
31	FLANGE – INLET TO REUSE VAT AUTOMATIC VALVE	A	N	A	N	A	N	A	N	A	N
32	BALL VALVE – REUSE VAT DRAIN	A	N	A	N	A	N	A	N	A	N
33	BALL VALVE – RECIRC PUMP DISCHARGE	A	N	A	N	A	N	A	N	A	N
34	BALL VALVE – RECIRIC PUMP DISCHARGE TO DRUM WASHER	A	N	A	N	A	N	A	N	A	N
35	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N
36	BALL VALVE – SUMP SUCTION LINE	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~~

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, does not operate smoothly, 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**

Draw a line through pump and valve I.D. numbers that do not apply

INSPECTION LOG SHEET FOR:

Weekly Inspection of **SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES AND MISCELLANEOUS EQUIPMENT**

INSPECTOR'S NAME / INITIALS / TITLE _____

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

____/____/____ ____/____/____ ____/____/____ ____/____/____ ____/____/____

DATE: (M / D / Y)

_____ _____ _____ _____ _____

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, other: _____

Eyewash and Shower: A N

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

Communication Devices: A N

If 'N', circle appropriate problem: inadequate supply of telephones, malfunctioning telephones, 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, warning signs, other: _____

*** Fill in the Waste Type (e.g. Mineral Spirits)** ****A = Acceptable N = Not Acceptable**

(IF AN ITEM IS NOT APPLICABLE ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/ NOT ACCEPTABLE' ROW)

ATTACHMENT 5-2
VAPOR PRESSURE SUMMARY AND SUBPART CC COMPLIANCE

Attachment 5-2, Table 1
Safety-Kleen Solvents
Vapor Pressure Summary
(Isoteniscope Method)

Product Name	Product Number	68^0 F (20^0 C)				100^0 F (38^0 C)			
		mm-Hg		K Pa		mm-Hg		K Pa	
SK 105 Recycled	6614 (CA) 6617 (Non-CA)	0.4		0.053		1.0		0.133	
SK 105 Virgin	6610	0.81		0.108		1.0		0.133	
SK 150 Premium	6605 6616	0.2		0.0267		0.6		0.08	
Immersion Cleaner	699	<0.4		<0.054		-		-	
Heavy Duty Lacquer Thinner	6782 MSDS	75-94.7 86		10-12.6 11.5		-		-	
Low V.P. Lacquer Thinner	6874	<35		<4.67		-		-	
Bulked Waste Solvent	NA	0.57 Ave 0.96 Max		0.076 0.128		-		-	

(US) Light liquid service > 0.3 KPa @ 20^0 C

SUBPART CC COMPLIANCE PLAN

Safety-Kleen Systems, Inc.
4210A Hawkins Road
Farmington, New Mexico
NMD980698849

The Safety-Kleen Farmington, New Mexico facility shall control air pollutant emissions from waste management units at this facility pursuant to the requirements of RCRA Subpart CC, through implementation of this compliance plan.

The following plan describes this facility's waste determination procedures, tank and container design/management practices, organic emission controls, inspection and monitoring, and recordkeeping and reporting, pursuant to requirements/standards promulgated under RCRA Subpart CC.

Waste Determination Procedures

For purposes of waste determination, this facility utilizes knowledge developed in the Waste Characterization portion of the Permit. For those hazardous waste which are managed on a transfer basis, and which are not described in the Permit, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all wastes managed in tanks or containers at this facility may display an average volatile organic concentration of greater than 500 ppmw at the point of waste origination. Therefore, all hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

Point of Waste Origination

The point of waste origination for all wastes generated offsite and transported to the site in closed containers, which are subsequently managed in tanks or containers at this facility, is effectively the site boundary at the entrance gate.

For those hazardous wastes generated onsite, the point of waste origination is the point of waste generation, as previously defined in RCRA.

Tanks

Tanks which manage organic wastes at this facility are described in detail in the Permit. Certain features of these units, as they relate to the Subpart CC standards, are described below.

Waste mineral spirits ASTs are fixed roof, non-pressurized, quiescent tanks. All waste tanks at the facility are Level 1 tanks under Subpart CC. The tank design capacity is less than 75 cubic meters or about 19,813 gallons, and the waste in these tanks exhibits a vapor pressure of less than 76.6 kPa (11.1 psi). The actual vapor pressure of the waste managed in tanks is shown in Attachment 5-2 Table 1. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 265.1084(c)(4). Documentation for the basis of this determination is found in the Waste Characteristics portion of the Permit.

These tanks are designed so that all cover openings can be closed with no visible gaps, holes, cracks, or other open spaces into the interior of the tank. The cover and all cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position at all times except when waste is being added to or removed from the tank, or when necessary sampling or repair/maintenance is performed on the tanks.

These tanks are vented to the atmosphere through a safety device (conservation vent) which has been designed to operate with no detectable organic emissions when the device is in the closed position.

The drum washing unit at this facility is a fixed roof, Level 1 tank. This unit is kept closed except when adding or removing wastes, washing drums, sampling, or performing routine maintenance that requires the lid to be open.]

Containers

Containers which manage organic wastes at this facility are described in detail in the Permit. Certain features of these units, as they relate to the Subpart CC regulations, are described below.

Containers managing hazardous wastes at this facility generally fall into three categories. (1) Those hazardous waste containers that are less than 26 gallons in capacity are wholly exempt from consideration under Subpart CC. Safety-Kleen manages waste with vapor pressures greater than 0.3 kPa at 20° C (e.g. lacquer thinner / paint wastes) both in containers less than 0.1 m^3 about 26 gallons and in containers less than 0.46 m^3 or about 122 gallons. Containers of waste that are transferred through the facility are still "in the course of transportation," and therefore are exempt from Subpart CC. (2) Containers with capacities between 26 and 122 gallons are all Level 1 containers, and generally meet the Level 1 standards as covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the containers. In addition, all Safety-Kleen containers used to manage waste meet applicable U.S. DOT regulations on packaging hazardous materials for transportation. (3) Containers with capacities greater than 122 gallons that manage hazardous wastes at this facility are not in light material service (i.e. containers greater than 122 gallons are not used to manage wastes with vapor pressures greater than 0.3 kPa at 20° C). Containers greater than 122 gallons are however, Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container and comply with applicable U.S. DOT regulations on packaging hazardous materials for transportation.

(0.46 m^3= 121.5 gal; 0.1 m^3 = 26.4 gal; 75 m^3 = 19,812.9 gal)

Inspections and Monitoring

Hazardous wastes accepted from off-site generators are already containerized when the facility accepts the waste. Such containers are visually inspected either at the time they are unloaded for storage or staged for transfer at the facility, or during the daily facility inspection. The inspection occurs within 24 hours of the waste's arrival at the facility. This written plan and schedule to perform the inspections is incorporated in the facility inspection plan by this reference.

An initial visual tank inspection was conducted on August 24, 1992. No defects were noted on the waste solvent tank which could result in air pollutant emissions.

Visual tank inspections shall be conducted on an annual basis.

Recordkeeping

Documentation of tank and tank cover design: See Permit.

Documentation of waste determination: See Attachment 5-2 Table 1.

Records of all visual inspection: See daily facility inspection records.

Listing of all tanks, by unique identifying number, which are difficult or unsafe to inspect: Not applicable at this site.

Results of the determination of the maximum vapor pressure of waste in tanks and record of the tank dimensions and design capacity: See Permit Attachment 5-2 Table 1 and Attachment 1-1.

Subpart CC Visual Inspection Checklists

End of Week Container Inspection

End of Week Container Inspection – complete this checklist the last day of the service week when the facility inspection will not be conducted within 24 hours. This inspection on containers will supplement container inspections completed during facility inspections during the workweek.

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Condition of containers (Circle "A" if the condition of all containers is acceptable; circle "N" if the condition of one or more containers is not acceptable.)

A N

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

Action taken to correct unacceptable condition: _____

Annual Visual Tank Inspection

Visual Tank Inspection - Complete this inspection once each year to satisfy the annual inspection required under Subpart CC.

Inspector Name: _____ Signature: _____

Date of Inspection: _____

Defects Noted: _____

Action taken to correct unacceptable condition: _____

Tank Inspection difficult or unsafe: _____

ATTACHMENT 5-3
EQUIPMENT INVENTORY FOR INSPECTIONS

SUBPART BB EQUIPMENT INVENTORY

Listed on the attached master list is all equipment at the facility which is subject to the requirements of 40 CFR 264 and 265, Subpart BB. The numbered equipment is also identified on the attached Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste tank system is spent mineral spirits containing one or more of the following waste codes: D001, D004-D011, D018, D019, D021-D030 and D032-Do43. Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic but may contain water. The vapor pressure of the bulked spent mineral spirits at 60° F is provided in Attachment 5-2, Table 1, is less than 0.3 kPa at 20° C and is thus defined as heavy liquid under the cited regulations.

Compliance with the standard (264.1058) will be achieved through daily facility inspections, and if required, leak repair. The facility inspection record has been updated to include a detailed daily equipment inspection. Records of equipment repair are maintained on the subpart BB tank inspection record. No monitoring is required as Safety-Kleen solvents have such a low vapor pressure that at no time will the vapor around a visible leak be at or above 10,000 ppm VOC as measured via test methods specified in the regulations. A vapor pressure of 1.015 kPa or 7.6 mm Hg is necessary to produce a reading of 10,000 ppm and to define a leak as a subpart bb leak. Safety-Kleen takes the conservative approach and fixes all potential subpart bb leaks found in the waste solvent tank system and is not required to conduct monitoring of potential leaks. This is more protective of human health and the environment than the regulations.

Leak Detection and Repair Record

After detection of a potential leak, a pump or valve must be repaired to repair the leaking item. Identification of the leak and its repair are noted on the facility inspection record for the Waste Solvent Tank System, page 3 of 3.

DATE 12-16-2009

MASTER LIST

BRANCH # 7-008-21

PREPARER'S SIGNATURE _____

HAZARDOUS WASTE – HEAVY LIQUID

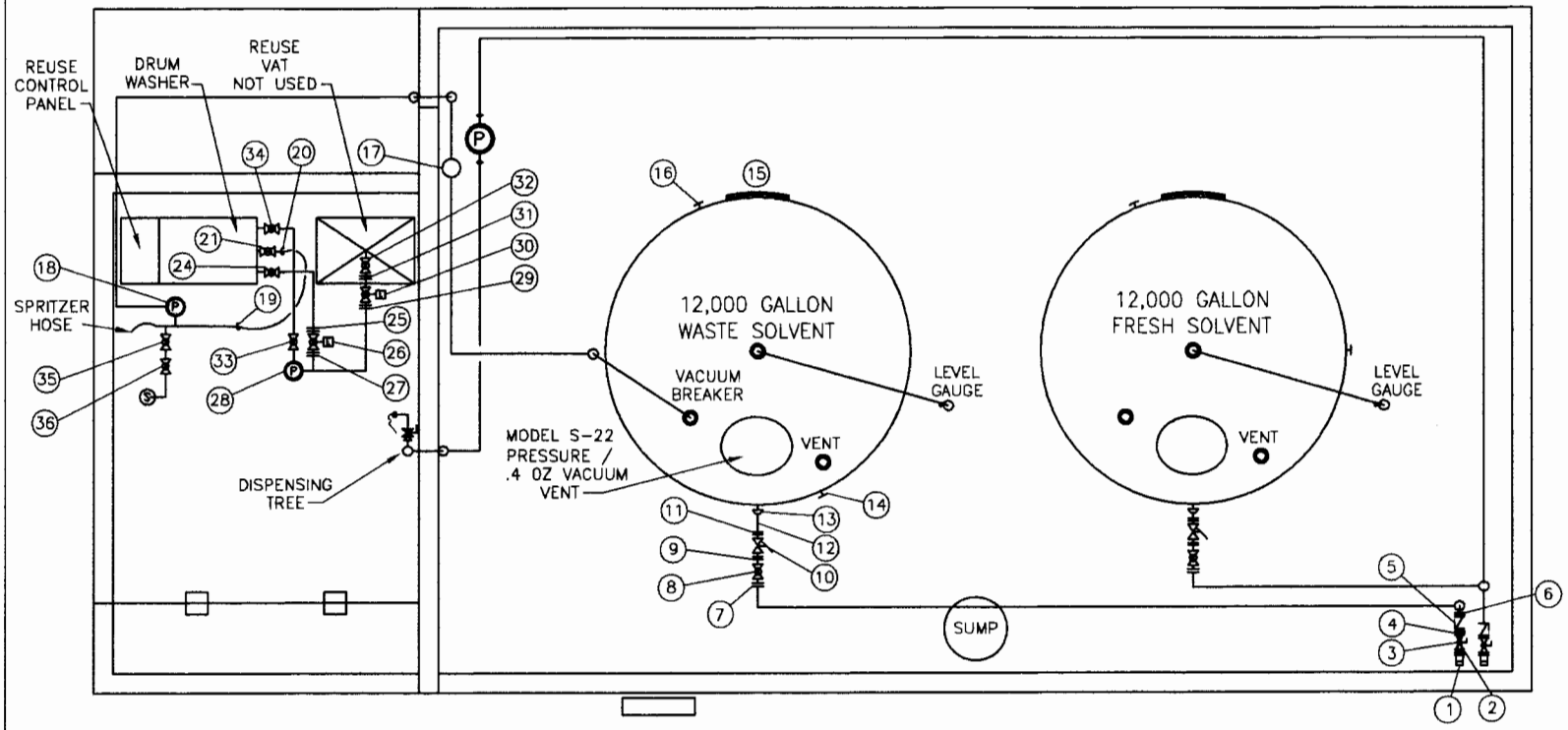
	INDIVIDUAL NUMBER	TYPE	HAZARDOUS WASTE MANAGEMENT UNIT	GENERAL LOCATION *
	1	CAMLOCK CAP	TANK FARM	TANKER ACCESS BOX
	2	FLANGE	TANK FARM	TANKER ACCESS BOX
	3	BALL VALVE	TANK FARM	TANKER ACCESS BOX
	4	FLANGE	TANK FARM	TANKER ACCESS BOX
	5	CHECK VALVE	TANK FARM	TANKER ACCESS BOX
	6	FLANGE	TANK FARM	TANKER ACCESS BOX
	7	FLANGE	TANK FARM	BOTTOM OUTLET TANK
	8	BALL VALVE	TANK FARM	BOTTOM OUTLET TANK
	9	FLANGE	TANK FARM	BOTTOM OUTLET TANK
	10	EMERGENCY FIRE VALVE	TANK FARM	BOTTOM OUTLET TANK
	11	FLANGE	TANK FARM	BOTTOM OUTLET TANK
	12	PIPE NIPPLE	TANK FARM	BOTTOM OUTLET TANK
	13	PIPE BELL REDUCER	TANK FARM	BOTTOM OUTLET TANK
	14	THREADED PLUG	TANK FARM	TANK SIDE BY OUTLET PIPING
	15	SIDE MANWAY	TANK FARM	TANK SIDE AT BOTTOM
	16	THREADED PLUG	TANK FARM	TANK SIDE BY BOTTOM MANWAY
	17	IN LINE STRAINER	TANK FARM	TANK FARM SECONDARY CONTAINMENT
	18	DIRTY SOLVENT DISCHARGE PUMP	TANK FARM	UNDER RETURN & FILL GRATE
	19	CAMLOCK FITTING	TANK FARM	UNDER RETURN & FILL GRATE
	20	CAMLOCK FITTING	TANK FARM	UNDER RETURN & FILL GRATE
	21	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
	22	NOT USED	NA	NA
	23	NOT USED	NA	NA
	24	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
	25	FLANGE	TANK FARM	UNDER RETURN & FILL GRATE
	26	AUTOMATIC VALVE	TANK FARM	UNDER RETURN & FILL GRATE
	27	FLANGE	TANK FARM	UNDER RETURN & FILL GRATE
	28	RECIRCULATION PUMP	TANK FARM	UNDER RETURN & FILL GRATE
	29	FLANGE	TANK FARM	UNDER RETURN & FILL GRATE
	30	AUTOMATIC VALVE	TANK FARM	UNDER RETURN & FILL GRATE
	31	FLANGE	TANK FARM	UNDER RETURN & FILL GRATE
	32	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
	33	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
	34	BALL VALVE	TANK FARM	UNDER RETURN & FILL GRATE
	35	BALL VALVE, SUMP SUCTION	TANK FARM	UNDER RETURN & FILL GRATE
	36	BALL VALVE, SUMP SUCTION	TANK FARM	UNDER RETURN & FILL GRATE
	RETURN & FILL**	NON-FLANGE FITTINGS	TANK FARM	UNDER RETURN & FILL GRATE
	TANK FARM ***	NON-FLANGE FITTINGS	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT AREA

* See Subpart BB drawing for more specific locations.

** All non-flanged fittings under the Return & Fill grating except the drip pan drain

*** All non-flanged fittings in the waste solvent tank farm secondary containment area are marked with brown color or are connected to piping that marked with brown color.

VALVE, FLANGE, PUMP
ID & LOCATION DRAWING



FITTING SCHEDULE

1	CAMLOCK CAP	19	CAMLOCK FITTING DISCH. PUMP SUCTION
2	FLANGE	20	CAMLOCK FITTING
3	BALL VALVE	21	BALL VALVE D.W. TO DISCHARGE PUMP
4	FLANGE	22	NOT USED
5	CHECK VALVE	23	NOT USED
6	FLANGE	24	BALL VALVE D.W. TO RECIRC. PUMP
7	FLANGE	25	FLANGE
8	BALL VALVE	26	AUTOMATIC VALVE D.W. TO RECIRC. PUMP
9	FLANGE	27	FLANGE
10	EMERGENCY FIRE VALVE	28	RECIRCULATION PUMP
11	FLANGE	29	FLANGE- EXIT AUTO VALVE FROM REUSE VAT
12	PIPE NIPPLE	30	AUTOMATIC VALVE FROM REUSE VAT
13	PIPE BELL REDUCER	31	FLANGE INLET AUTO VALVE TO REUSE VAT
14	THREADED PLUG IN TANK WALL	32	BALL VALVE REUSE VAT DRAIN
15	SIDE MANWAY	33	BALL VALVE RECIRC. PUMP DISCHARGE
16	THREADED PLUG IN TANK WALL	34	BALL VALVE RECIRC. PUMP TO DRUM WASHER
17	IN LINE STRAINER	35	BALL VALVE R/F SUMP SUCTION LINE
18	DIRTY SOLVENT DISCHARGE PUMP	36	BALL VALVE R/F SUMP SUCTION LINE

SYMBOL LIST

	CAMLOC COUPLING
	BALL VALVE
	INTERNAL EMERGENCY VALVE
	CHECK VALVE
	STRAINER
	PUMP
	REDUCER
	FLANGE
	AUTOMATIC (ELECTRONIC) BALL VALVE

GENERAL NOTES

1. PIPING AND TAGGING FIELD VERIFIED ON 12-16-09 BY S-K.

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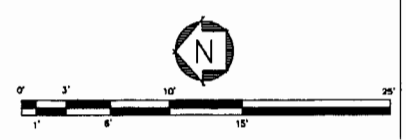


Project Solutions
2000 West Broadway • Suite 210 • Columbia • MO 65203
• Phone: (573) 443-7100 • Fax: (573) 443-7101 •

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	REVISED PER COMMENTS	JEK	RS	RS	12/2/09
0	ISSUED FOR REVIEW	JEK	RS	RS	12/17/09

REVISIONS

TITLE
TANK FARM – R/F PART BB TAGGING PLAN

SAFETY-KLEEN SYSTEMS, INC.
5400 LEGACY DR CLUSTER III, BLDG.3 PLANO, TX 75024
PHONE: 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1/2"=1'	JEK	RS	RS	RS	12/17/09

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
FARMINGTON, N.M.	7133-4100-350	A

ADDITIONAL REQUESTED MODIFICATOINS

#2 <u>The numbering of subpart BB fittings</u>

Included are:

- **EPA LETTER TO MR. KING**
- **Subpart BB Equipment Inventory & Master List in MS Word Tracking Changes format**
- **Subpart BB tag location drawing labeled RDLN 2**
- **Tank Farm Inspection Form page 3 of 3 labeled RDLN 2**

- **Subpart BB Equipment Inventory & Master List in a clean version**
- **Subpart BB tag location drawing labeled RDLN 2**
- **Tank Farm Inspection Form page 3 of 3 labeled CLN 2**

Faxback 11802
9531.1993(01)

United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

February 23, 1993

Mr. Gary S. King, P.E.
Environmental Audit Manager
Safety-Kleen
777 Big Timber Road
Elgin, Illinois 60123

Dear Mr. King:

This is in response to your letter of January 5, 1993 in which you requested an interpretation of whether several particular connections would be considered flanges and thus subject to reporting and recordkeeping requirements of the Subpart BB regulations at 40 CFR 264/265.

"Connector" is defined at 40 CFR 264.1031 as "flanged, screwed, welded, or other joined fittings used to connect two pipelines or a pipeline and a piece of equipment." For the purposes of reporting and recordkeeping, "connector" is further defined as "flanged fittings that are not covered by insulation; or other materials that prevent location of the fittings." EPA interprets these regulations to mean that although the general definition of "connector" includes flanged fittings as a subset. For reporting and recordkeeping purposes the definition of "connector" includes only flanged fittings (e.g., those screwed, welded, or otherwise joined are not flanges). The following items are those you identified and requested an interpretation as to whether they are "flanges:"

1. Screwed unions

2. Quick disconnect hose fittings

3. Quick disconnect hose fittings at the end of a pipe preceded by a closed valve, that has been plugged capped (i.e., to meet the requirements of 265.1056)

4. Strainer housing that has a flange-type top

While all of the above listed items meet the general definition of "connector," EPA does not believe they meet the more specific definition of "flanged fittings" for reporting recordkeeping purposes under Subpart BB of 40 CFR 264.1064 and 264.1065 and 265.1064. Please be advised, however, that these "other-than-flange type connectors" remain subject to the Subpart BB requirements for inspection and leak monitoring and repair.

If you have any further questions concerning these matters, you may contact Jim Michael, Acting Chief, Assistance Branch, at 703-308-8610.

Sincerely,
Sylvia K. Lowrance, Director
Office of Solid Waste

bcc: Permit Section Chiefs, Regions I-X
Jim Michael, PSPD, OSW
Robert Lucas, OAQPS

SUBPART BB EQUIPMENT INVENTORY

Listed on the attached master list is all equipment at the facility which is subject to the requirements of 40 CFR 264 and 265, Subpart BB. The numbered equipment is also identified on the attached Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste tank system is spent mineral spirits containing one or more of the following waste codes: D001, D004-D011, D018, D019, D021-D030 and D032-D043. Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic but may contain water. The vapor pressure of the bulked spent mineral spirits at 60° F as provided in Attachment 5-2, Table 1, is less than 0.3 kPa at 20°C and is thus defined as heavy liquid under the cited regulations.

Compliance with the standard (264.1058) will be achieved through facility inspections conducted each operating day, and if required, leak repair. Records of equipment leaks and repair are maintained on the Tank Farm Inspection Record page 3 of 3, Subpart BB Inspections conducted each operating day.

If a leak is discovered (by visual evidence or excessive odor) note it as "N" on the form and write the number or description of the leaking item on the inspection record.

Leak Detection and Repair Record

After detection of a leak, a repair must be made within 15 days. Note the repair on the Subpart BB inspection record, page 3 of 3 of the Tank Farm inspections.

Deleted: detection monitoring and

Deleted: The facility inspection record has been updated to include a detailed inspection of Subpart BB equipment.

Deleted: monitoring

Deleted: a separate form in the operating record

Deleted: potential

Deleted: follow the procedure below for the Leak Detection and Repair Record.

Deleted: potential or actual

Deleted: pump or valve must be monitored with a photoionizer-type instrument within five days. If the instrument reading is 10,000 ppm or greater, a leak is confirmed and a

Deleted: Contact your Regional Environmental Engineer immediately to arrange for the equipment to be monitored by a local environmental consultant.

Deleted: The third form must only be completed for each potential or actual leak detected. The piece of equipment must be tagged with the I.D. number, date of potential or actual leak detection and date of leak confirmation. Tags may be obtained from Tech. Services. After a valve has been repaired, it must be monitored monthly by a consultant using a photoionization detector. After two successive months with no leak detection, the identification may be removed and monitoring discontinued. For other equipment, such as pumps, the tag may be removed after a successful repair. This form must be kept in a new file (1220.2 – Leak Detection and Repair Record).¶

MASTER LIST

DATE 12-16-2009

BRANCH # 7-008-21

PREPARER'S SIGNATURE _____

HAZARDOUS WASTE – HEAVY LIQUID

INDIVIDUAL NUMBER	TYPE	HAZARDOUS WASTE MANAGEMENT UNIT	GENERAL LOCATION *
1	NOT USED		
2	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
3	BALL VALVE	TANK SYSTEM	TANKER ACCESS BOX
4	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
5	CHECK VALVE	TANK SYSTEM	TANKER ACCESS BOX
6	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
7	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
8	BALL VALVE	TANK SYSTEM	BOTTOM OUTLET TANK
9	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
10	EMERGENCY FIRE VALVE	TANK SYSTEM	BOTTOM OUTLET TANK
11	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
12	NOT USED		
13	NOT USED		
14	NOT USED		
15	SIDE MANWAY	TANK SYSTEM	TANK SIDE AT BOTTOM
16	NOT USED		
17	IN LINE STRAINER	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT
18	DIRTY SOLVENT DISCHARGE PUMP	TANK SYSTEM	UNDER RETURN & FILL GRATE
19	NOT USED		
20	NOT USED		
21	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
22	NOT USED	NA	NA
23	NOT USED	NA	NA
24	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
25	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
26	AUTOMATIC VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
27	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
28	RECIRCULATION PUMP	TANK SYSTEM	UNDER RETURN & FILL GRATE
29	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
30	AUTOMATIC VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
31	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
32	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
33	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
34	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
35	BALL VALVE, SUMP SUCTION	TANK SYSTEM	UNDER RETURN & FILL GRATE
36	BALL VALVE, SUMP SUCTION	TANK SYSTEM	UNDER RETURN & FILL GRATE
RETURN & FILL**	NON-FLANGE FITTINGS	TANK SYSTEM	UNDER RETURN & FILL GRATE
TANK FARM ***	NON-FLANGE FITTINGS	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT AREA

Deleted: CAMLOCK CAP
Deleted: TANK SYSTEM
Deleted: TANKER ACCESS BOX
Deleted: PIPE NIPPLE
Deleted: TANK SYSTEM
Deleted: BOTTOM OUTLET TANK
Deleted: PIPE BELL REDUCER
Deleted: TANK SYSTEM
Deleted: BOTTOM OUTLET TANK
Deleted: THREADED PLUG
Deleted: TANK SYSTEM
Deleted: TANK SIDE BY OUTLET PIPING
Deleted: THREADED PLUG
Deleted: TANK SYSTEM
Deleted: TANK SIDE BY BOTTOM MANWAY
Deleted: CAMLOCK FITTING
Deleted: TANK SYSTEM
Deleted: UNDER RETURN & FILL GRATE
Deleted: CAMLOCK FITTING
Deleted: TANK SYSTEM
Deleted: UNDER RETURN & FILL GRATE

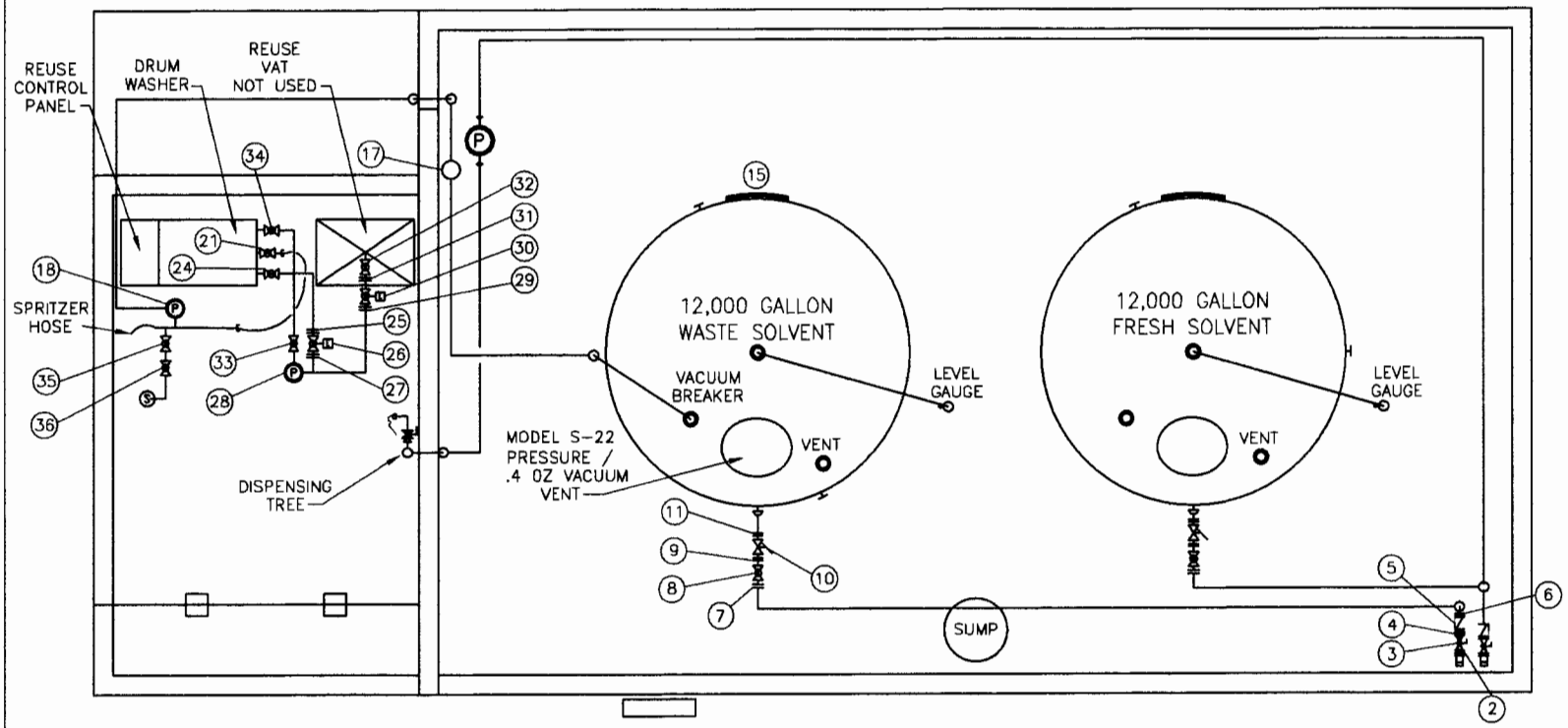
* See Subpart BB drawing for more specific locations.

** All non-flanged fittings under the Return & Fill grating except the drip pan drain

*** All non-flanged fittings in the waste solvent tank farm secondary containment area are marked with brown color or are connected to piping that is marked with brown color.

VALVE, FLANGE, PUMP
ID & LOCATION DRAWING

RDLN 2



SYMBOL LIST

E	CAMLOC COUPLING
	BALL VALVE
	INTERNAL EMERGENCY VALVE
	CHECK VALVE
	STRAINER
P	PUMP
	REDUCER
	FLANGE
	AUTOMATIC (ELECTRONIC) BALL VALVE

GENERAL NOTES

1. PIPING AND TAGGING FIELD VERIFIED ON 12-16-09 BY S-K.

PROPRIETARY STATEMENT

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FITTING SCHEDULE

1	NOT USED	19	NOT USED
2	FLANGE	20	NOT USED
3	BALL VALVE	21	BALL VALVE D.W. TO DISCHARGE PUMP
4	FLANGE	22	NOT USED
5	CHECK VALVE	23	NOT USED
6	FLANGE	24	BALL VALVE D.W. TO RECIRC. PUMP
7	FLANGE	25	FLANGE
8	BALL VALVE	26	AUTOMATIC VALVE D.W. TO RECIRC. PUMP
9	FLANGE	27	FLANGE
10	EMERGENCY FIRE VALVE	28	RECIRCULATION PUMP
11	FLANGE	29	FLANGE- EXIT AUTO VALVE FROM REUSE VAT
12	NOT USED	30	AUTOMATIC VALVE FROM REUSE VAT
13	NOT USED	31	FLANGE INLET AUTO VALVE TO REUSE VAT
14	NOT USED	32	BALL VALVE REUSE VAT DRAIN
15	SIDE MANWAY	33	BALL VALVE RECIRC. PUMP DISCHARGE
16	NOT USED	34	BALL VALVE RECIRC. PUMP TO DRUM WASHER
17	IN LINE STRAINER	35	BALL VALVE R/F SUMP SUCTION LINE
18	DIRTY SOLVENT DISCHARGE PUMP	36	BALL VALVE R/F SUMP SUCTION LINE

NO.	DESCRIPTION	BY	CHK	APPR	DATE
B	RDLN 2	JEK	RS	RS	122609
A	REVISED PER COMMENTS	JEK	RS	RS	122309
0	ISSUED FOR REVIEW	JEK	RS	RS	121709

REVISIONS

TITLE: TANK FARM – R/F PART BB TAGGING PLAN

SAFETY-KLEEN SYSTEMS, INC.
5400 LEGACY DR CLUSTER H, BLDG.3 PLANO, TX 75024
PHONE: 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1/2"=1'	JEK	RS	RS	RS	12/17/09

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
FARMINGTON, N.M.	7133-4100-350	B

INSPECTION LOG SHEET FOR:
Daily Inspection of TANK EQUIPMENT

Comment [RGS1]: RDLN 2

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	NOT USED *	A**	N	A	N	A	N	A	N	A	N
2	FLANGE	A	N	A	N	A	N	A	N	A	N
3	BALL VALVE	A	N	A	N	A	N	A	N	A	N
4	FLANGE	A	N	A	N	A	N	A	N	A	N
5	CHECK VALVE	A	N	A	N	A	N	A	N	A	N
6	FLANGE	A	N	A	N	A	N	A	N	A	N
7	FLANGE	A	N	A	N	A	N	A	N	A	N
8	BALL VALVE	A	N	A	N	A	N	A	N	A	N
9	FLANGE	A	N	A	N	A	N	A	N	A	N
10	EMERGENCY FIRE VALVE	A	N	A	N	A	N	A	N	A	N
11	FLANGE	A	N	A	N	A	N	A	N	A	N
12	NOT USED	A	N	A	N	A	N	A	N	A	N
13	NOT USED	A	N	A	N	A	N	A	N	A	N
14	NOT USED	A	N	A	N	A	N	A	N	A	N
15	MANWAY ON SIDE OF TANK	A	N	A	N	A	N	A	N	A	N
16	NOT USED	A	N	A	N	A	N	A	N	A	N
17	IN LINE STRAINER	A	N	A	N	A	N	A	N	A	N
18	DIRTY SOLVENT DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
19	NOT USED	A	N	A	N	A	N	A	N	A	N
20	NOT USED	A	N	A	N	A	N	A	N	A	N
21	BALL VALVE – DRUM WASHER TO DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
22	NOT USED	A	N	A	N	A	N	A	N	A	N
23	NOT USED	A	N	A	N	A	N	A	N	A	N
24	BALL VALVE – DRUM WASHER TO RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
25	FLANGE	A	N	A	N	A	N	A	N	A	N
26	AUTOMATIC VALVE – DRUM WASHER TO RECIRCULATING PUMP	A	N	A	N	A	N	A	N	A	N
27	FLANGE	A	N	A	N	A	N	A	N	A	N
28	RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
29	FLANGE – EXIT AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N	A	N	A	N
30	AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N	A	N	A	N
31	FLANGE – INLET TO REUSE VAT AUTOMATIC VALVE	A	N	A	N	A	N	A	N	A	N
32	BALL VALVE – REUSE VAT DRAIN	A	N	A	N	A	N	A	N	A	N
33	BALL VALVE – RECIRC PUMP DISCHARGE	A	N	A	N	A	N	A	N	A	N
34	BALL VALVE – RECIRIC PUMP DISCHARGE TO DRUM WASHER	A	N	A	N	A	N	A	N	A	N
35	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N
36	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N

Deleted: CAMLOCK CAP

Deleted: PIPE NIPPLE

Deleted: PIPE BELL REDUCER

Deleted: THREADED PLUG IN TANK WALL

Deleted: THREADED PLUG IN TANK WALL

Deleted: CAMLOCK FITTING SUCTION DISCHARGE PUMP

Deleted: CAMLOCK FITTING

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, does not operate smoothly, 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**

Draw a line through pump and valve I.D. numbers that do not apply

SUBPART BB EQUIPMENT INVENTORY

Listed on the attached master list is all equipment at the facility which is subject to the requirements of 40 CFR 264 and 265, Subpart BB. The numbered equipment is also identified on the attached Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste tank system is spent mineral spirits containing one or more of the following waste codes: D001, D004-D011, D018, D019, D021-D030 and D032-D043. Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic but may contain water. The vapor pressure of the bulked spent mineral spirits at 60° F as provided in Attachment 5-2, Table 1, is less than 0.3 kPa at 20° C and is thus defined as heavy liquid under the cited regulations.

Compliance with the standard (264.1058) will be achieved through facility inspections conducted each operating day, and if required, leak repair. Records of equipment leaks and repair are maintained on the Tank Farm Inspection Record page 3 of 3, Subpart BB Inspections conducted each operating day.

<u>If a leak is discovered (by visual evidence or excessive odor) note it as "N" on the form and write the number or description of the leaking item on the inspection record.</u>

<u>Leak Detection and Repair Record</u>

After detection of a leak, a repair must be made within 15 days. Note the repair on the Subpart BB inspection record, page 3 of 3 of the Tank Farm inspections

DATE 12-16-2009

MASTER LIST

BRANCH # 7-008-21

PREPARER'S SIGNATURE _____

HAZARDOUS WASTE – HEAVY LIQUID

INDIVIDUAL NUMBER	TYPE	HAZARDOUS WASTE MANAGEMENT UNIT	GENERAL LOCATION *
1	NOT USED		
2	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
3	BALL VALVE	TANK SYSTEM	TANKER ACCESS BOX
4	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
5	CHECK VALVE	TANK SYSTEM	TANKER ACCESS BOX
6	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
7	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
8	BALL VALVE	TANK SYSTEM	BOTTOM OUTLET TANK
9	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
10	EMERGENCY FIRE VALVE	TANK SYSTEM	BOTTOM OUTLET TANK
11	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
12	NOT USED		
13	NOT USED		
14	NOT USED		
15	SIDE MANWAY	TANK SYSTEM	TANK SIDE AT BOTTOM
16	NOT USED		
17	IN LINE STRAINER	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT
18	DIRTY SOLVENT DISCHARGE PUMP	TANK SYSTEM	UNDER RETURN & FILL GRATE
19	NOT USED		
20	NOT USED		
21	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
22	NOT USED	NA	NA
23	NOT USED	NA	NA
24	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
25	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
26	AUTOMATIC VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
27	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
28	RECIRCULATION PUMP	TANK SYSTEM	UNDER RETURN & FILL GRATE
29	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
30	AUTOMATIC VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
31	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
32	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
33	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
34	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
35	BALL VALVE, SUMP SUCTION	TANK SYSTEM	UNDER RETURN & FILL GRATE
36	BALL VALVE, SUMP SUCTION	TANK SYSTEM	UNDER RETURN & FILL GRATE
RETURN & FILL**	NON-FLANGE FITTINGS	TANK SYSTEM	UNDER RETURN & FILL GRATE
TANK FARM ***	NON-FLANGE FITTINGS	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT AREA

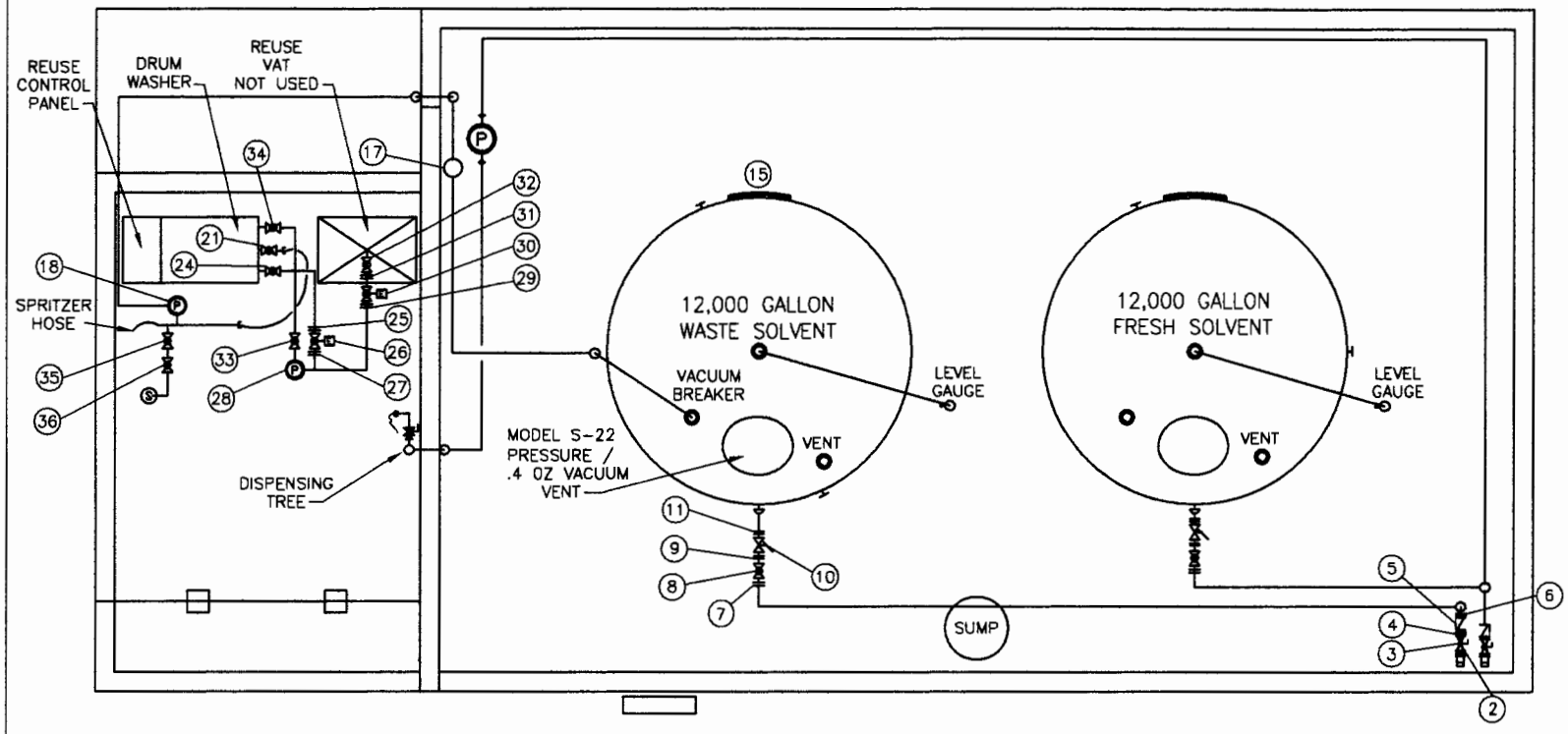
* See Subpart BB drawing for more specific locations.

** All non-flanged fittings under the Return & Fill grating except the drip pan drain

*** All non-flanged fittings in the waste solvent tank farm secondary containment area are marked with brown color or are connected to piping that is marked with brown color.

VALVE, FLANGE, PUMP
ID & LOCATION DRAWING

RDLN 2



SYMBOL LIST

	CAMLOC COUPLING
	BALL VALVE
	INTERNAL EMERGENCY VALVE
	CHECK VALVE
	STRAINER
	PUMP
	REDUCER
	FLANGE
	AUTOMATIC (ELECTRONIC) BALL VALVE

GENERAL NOTES

1. PIPING AND TAGGING FIELD VERIFIED ON 12-16-09 BY S-K

PROPRIETARY STATEMENT

THIS DRAWING IS THE EXCLUSIVE PROPERTY OF SAFETY-KLEEN SYSTEMS, INC. AND IS PROPRIETARY AND CONFIDENTIAL INFORMATION. THIS DRAWING AND THE INFORMATION CONTAINED THEREIN MUST NOT BE DUPLICATED, USED, DIVULGED, REPRODUCED, COPIED, DISCLOSED OR APPROPRIATED IN WHOLE OR IN PART FOR ANY PURPOSE OTHER THAN AS EXPRESSLY AUTHORIZED BY SAFETY-KLEEN SYSTEMS, INC. THIS DRAWING MUST BE RETURNED PROMPTLY UPON REQUEST.

FITTING SCHEDULE

1	NOT USED	19	NOT USED
2	FLANGE	20	NOT USED
3	BALL VALVE	21	BALL VALVE D.W. TO DISCHARGE PUMP
4	FLANGE	22	NOT USED
5	CHECK VALVE	23	NOT USED
6	FLANGE	24	BALL VALVE D.W. TO RECIRC. PUMP
7	FLANGE	25	FLANGE
8	BALL VALVE	26	AUTOMATIC VALVE D.W. TO RECIRC. PUMP
9	FLANGE	27	FLANGE
10	EMERGENCY FIRE VALVE	28	RECIRCULATION PUMP
11	FLANGE	29	FLANGE- EXIT AUTO VALVE FROM REUSE VAT
12	NOT USED	30	AUTOMATIC VALVE FROM REUSE VAT
13	NOT USED	31	FLANGE INLET AUTO VALVE TO REUSE VAT
14	NOT USED	32	BALL VALVE REUSE VAT DRAIN
15	SIDE RAMWAY	33	BALL VALVE RECIRC. PUMP DISCHARGE
16	NOT USED	34	BALL VALVE RECIRC. PUMP TO DRUM WASHER
17	IN LINE STRAINER	35	BALL VALVE R/F SUMP SUCTION LINE
18	DIRTY SOLVENT DISCHARGE PUMP	36	BALL VALVE R/F SUMP SUCTION LINE

N

0' 3' 10' 20'
1' 5' 15'

NO.	DESCRIPTION	BY	CHK	APPR	DATE
B	RDLN 2	JDK	RS	RS	122909
A	REVISED PER COMMENTS	JDK	RS	RS	122309
0	ISSUED FOR REVIEW	JDK	RS	RS	121709

REVISIONS

TITLE TANK FARM – R/F PART BB TAGGING PLAN

SAFETY-KLEEN SYSTEMS, INC.
3400 LEGACY DR. CLUSTER H, BLDG.3 PLANO, TX 75024
PHONE: 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1/2"=1'	JDK	RS	RS	RS	12/17/09

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
FARMINGTON, N.M.	7133-4100-350	B

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	NOT USED *	A**	N	A	N	A	N	A	N	A	N
2	FLANGE	A	N	A	N	A	N	A	N	A	N
3	BALL VALVE	A	N	A	N	A	N	A	N	A	N
4	FLANGE	A	N	A	N	A	N	A	N	A	N
5	CHECK VALVE	A	N	A	N	A	N	A	N	A	N
6	FLANGE	A	N	A	N	A	N	A	N	A	N
7	FLANGE	A	N	A	N	A	N	A	N	A	N
8	BALL VALVE	A	N	A	N	A	N	A	N	A	N
9	FLANGE	A	N	A	N	A	N	A	N	A	N
10	EMERGENCY FIRE VALVE	A	N	A	N	A	N	A	N	A	N
11	FLANGE	A	N	A	N	A	N	A	N	A	N
12	NOT USED	A	N	A	N	A	N	A	N	A	N
13	NOT USED	A	N	A	N	A	N	A	N	A	N
14	NOT USED	A	N	A	N	A	N	A	N	A	N
15	MANWAY ON SIDE OF TANK	A	N	A	N	A	N	A	N	A	N
16	NOT USED	A	N	A	N	A	N	A	N	A	N
17	IN LINE STRAINER	A	N	A	N	A	N	A	N	A	N
18	DIRTY SOLVENT DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
19	NOT USED	A	N	A	N	A	N	A	N	A	N
20	NOT USED	A	N	A	N	A	N	A	N	A	N
21	BALL VALVE – DRUM WASHER TO DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
22	NOT USED	A	N	A	N	A	N	A	N	A	N
23	NOT USED	A	N	A	N	A	N	A	N	A	N
24	BALL VALVE – DRUM WASHER TO RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
25	FLANGE	A	N	A	N	A	N	A	N	A	N
26	AUTOMATIC VALVE – DRUM WASHER TO RECIRCULATING PUMP	A	N	A	N	A	N	A	N	A	N
27	FLANGE	A	N	A	N	A	N	A	N	A	N
28	RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
29	FLANGE – EXIT AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N	A	N	A	N
30	AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N	A	N	A	N
31	FLANGE – INLET TO REUSE VAT AUTOMATIC VALVE	A	N	A	N	A	N	A	N	A	N
32	BALL VALVE – REUSE VAT DRAIN	A	N	A	N	A	N	A	N	A	N
33	BALL VALVE – RECIRC PUMP DISCHARGE	A	N	A	N	A	N	A	N	A	N
34	BALL VALVE – RECIRIC PUMP DISCHARGE TO DRUM WASHER	A	N	A	N	A	N	A	N	A	N
35	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N
36	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, does not operate smoothly, 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**
Draw a line through pump and valve I.D. numbers that do not apply

ADDITIONAL REQUESTED MODIFICATOINS

Removing the Reuse Vat and Associated Valves & Piping

Included are:

- **Subpart BB Equipment Inventory & Master List in MS Word Tracking Changes format showing the proposed changes**
- **Subpart BB tag location drawing labeled RDLN 3 assuming RDLN 2 is approved.**
- **Tank Farm Inspection Form page 3 of 3 labeled RDLN 3 assuming RDLN 2 is approved.**
- **Subpart BB Equipment Inventory & Master List in a clean version**
- **Subpart BB tag location drawing labeled RDLN 3**
- **Tank Farm Inspection Form page 3 of 3 labeled CLN 3**

SUBPART BB EQUIPMENT INVENTORY

Listed on the attached master list is all equipment at the facility which is subject to the requirements of 40 CFR 264 and 265, Subpart BB. The numbered equipment is also identified on the attached Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste tank system is spent mineral spirits containing one or more of the following waste codes: D001, D004-D011, D018, D019, D021-D030 and D032-D043. Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic but may contain water. The vapor pressure of the bulked spent mineral spirits at 60° F as provided in Attachment 5-2, Table 1, is less than 0.3 kPa at 20° C and is thus defined as heavy liquid under the cited regulations.

Compliance with the standard (264.1058) will be achieved through facility inspections conducted each operating day, and if required, leak repair. Records of equipment leaks and repair are maintained on the Tank Farm Inspection Record page 3 of 3, Subpart BB Inspections conducted each operating day.

<u>If a leak is discovered (by visual evidence or excessive odor) note it as "N" on the form and write the number or description of the leaking item on the inspection record.</u>

<u>Leak Detection and Repair Record</u>

After detection of a leak, a repair must be made within 15 days. Note the repair on the Subpart BB inspection record, page 3 of 3 of the Tank Farm inspections.

DATE 12-16-2009

MASTER LIST

BRANCH # 7-008-21

PREPARER'S SIGNATURE _____

HAZARDOUS WASTE – HEAVY LIQUID

INDIVIDUAL NUMBER	TYPE	HAZARDOUS WASTE MANAGEMENT UNIT	GENERAL LOCATION *
1	NOT USED	NA	NA
2	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
3	BALL VALVE	TANK SYSTEM	TANKER ACCESS BOX
4	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
5	CHECK VALVE	TANK SYSTEM	TANKER ACCESS BOX
6	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
7	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
8	BALL VALVE	TANK SYSTEM	BOTTOM OUTLET TANK
9	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
10	EMERGENCY FIRE VALVE	TANK SYSTEM	BOTTOM OUTLET TANK
11	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
12	NOT USED	NA	NA
13	NOT USED	NA	NA
14	NOT USED	NA	NA
15	SIDE MANWAY	TANK SYSTEM	TANK SIDE AT BOTTOM
16	NOT USED	NA	NA
17	IN LINE STRAINER	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT
18	DIRTY SOLVENT DISCHARGE PUMP	TANK SYSTEM	UNDER RETURN & FILL GRATE
19	NOT USED	NA	NA
20	NOT USED	NA	NA
21	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
22	NOT USED	NA	NA
23	NOT USED	NA	NA
24	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
25	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
26	NOT USED	NA	NA
27	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
28	RECIRCULATION PUMP	TANK SYSTEM	UNDER RETURN & FILL GRATE
29	NOT USED	NA	NA
30	NOT USED	NA	NA
31	NOT USED	NA	NA
32	NOT USED	NA	NA
33	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
34	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
35	BALL VALVE, SUMP SUCTION	TANK SYSTEM	UNDER RETURN & FILL GRATE
36	BALL VALVE, SUMP SUCTION	TANK SYSTEM	UNDER RETURN & FILL GRATE
RETURN & FILL**	NON-FLANGE FITTINGS	TANK SYSTEM	UNDER RETURN & FILL GRATE
TANK FARM ***	NON-FLANGE FITTINGS	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT AREA

* See Subpart BB drawing for more specific locations.

** All non-flanged fittings under the Return & Fill grating except the drip pan drain

*** All non-flanged fittings in the waste solvent tank farm secondary containment area are marked with brown color or are connected to piping that marked with brown color.

Deleted: AUTOMATIC VALVE

Deleted: TANK SYSTEM

Deleted: UNDER RETURN & FILL GRATE

Deleted: FLANGE

Deleted: TANK SYSTEM

Deleted: UNDER RETURN & FILL GRATE

Deleted: AUTOMATIC VALVE

Deleted: TANK SYSTEM

Deleted: UNDER RETURN & FILL GRATE

Deleted: FLANGE

Deleted: TANK SYSTEM

Deleted: UNDER RETURN & FILL GRATE

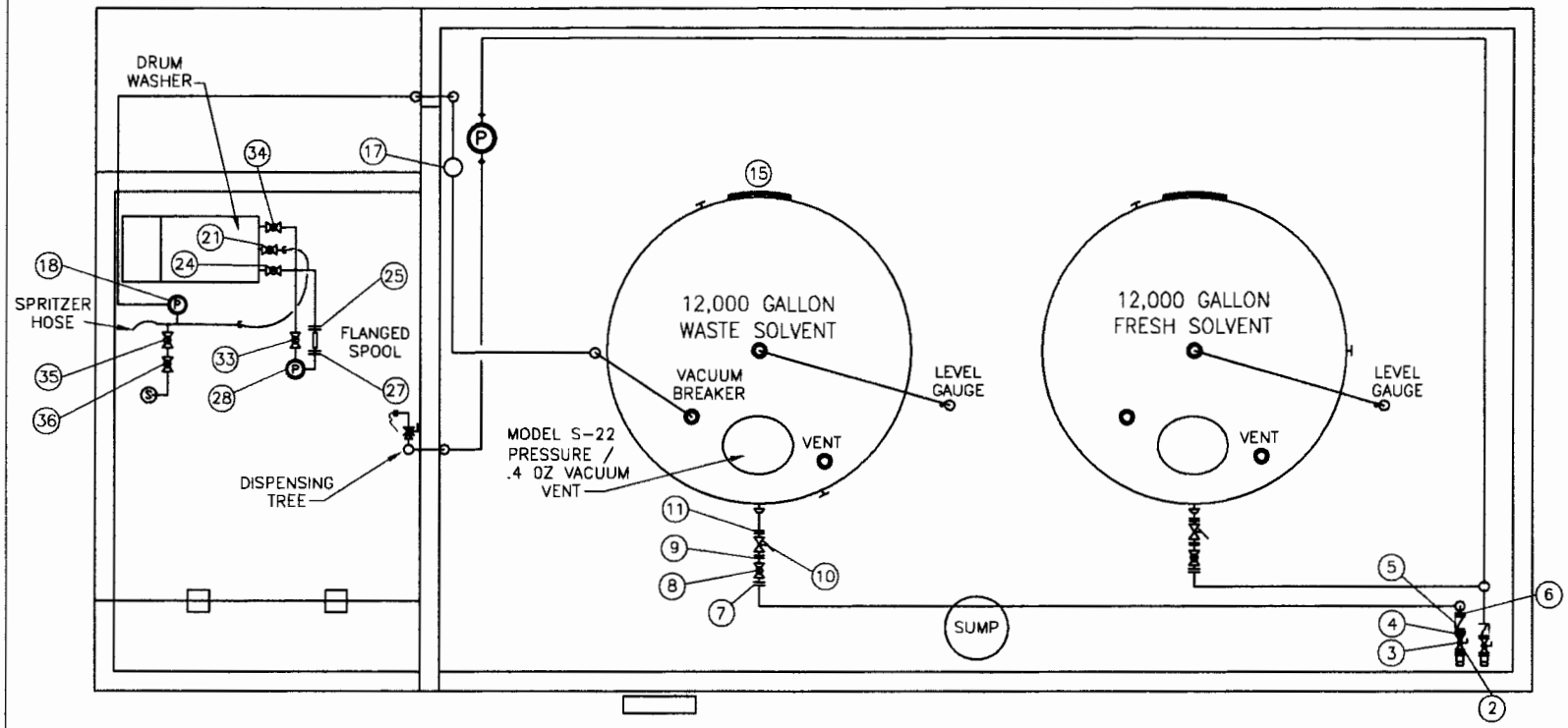
Deleted: BALL VALVE

Deleted: TANK SYSTEM

Deleted: UNDER RETURN & FILL GRATE

VALVE, FLANGE, PUMP
ID & LOCATION DRAWING

RDLN 3



SYMBOL LIST

E	CAMLOC COUPLING
	BALL VALVE
	INTERNAL EMERGENCY VALVE
	CHECK VALVE
	STRAINER
P	PUMP
	REDUCER
	FLANGE
	AUTOMATIC (ELECTRONIC) BALL VALVE

GENERAL NOTES

1. PIPING AND TAGGING FIELD VERIFIED ON 12-16-09 BY S-K.

PROPRIETARY STATEMENT

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FITTING SCHEDULE

1	NOT USED	19	NOT USED
2	FLANGE	20	NOT USED
3	BALL VALVE	21	BALL VALVE D.W. TO DISCHARGE PUMP
4	FLANGE	22	NOT USED
5	CHECK VALVE	23	NOT USED
6	FLANGE	24	BALL VALVE D.W. TO RECIRC. PUMP
7	FLANGE	25	FLANGE
8	NOT USED	26	NOT USED
9	FLANGE	27	FLANGE
10	EMERGENCY FIRE VALVE	28	RECIRCULATION PUMP
11	FLANGE	29	NOT USED
12	NOT USED	30	NOT USED
13	NOT USED	31	NOT USED
14	NOT USED	32	NOT USED
15	SIDE MANWAY	33	BALL VALVE RECIRC. PUMP DISCHARGE
16	NOT USED	34	BALL VALVE RECIRC. PUMP TO DRUM WASHER
17	IN LINE STRAINER	35	BALL VALVE R/F SUMP SUCTION LINE
18	DIRTY SOLVENT DISCHARGE PUMP	36	BALL VALVE R/F SUMP SUCTION LINE

N

0' 3' 10' 25'
1' 6' 15'

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	REVISED PER COMMENTS	JEK	RS	RS	102209
0	ISSUED FOR REVIEW	JEK	RS	RS	101709

REVISIONS

TITLE: TANK FARM – R/F PART BB TAGGING PLAN

SAFETY-KLEEN SYSTEMS, INC.
5400 LEGACY DR CLUSTER H, BLDG.3 PLANO, TX 75024
PHONE: 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1/2"=1'	JEK	RS	RS	RS	12/17/09

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
FARMINGTON, N.M.	7133-4100-350	A

INSPECTION LOG SHEET FOR:
Daily Inspection of **TANK EQUIPMENT**

Comment [RGS1]: RDLN 3

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	NOT USED *	A**	N	A	N	A	N	A	N	A	N
2	FLANGE	A	N	A	N	A	N	A	N	A	N
3	BALL VALVE	A	N	A	N	A	N	A	N	A	N
4	FLANGE	A	N	A	N	A	N	A	N	A	N
5	CHECK VALVE	A	N	A	N	A	N	A	N	A	N
6	FLANGE	A	N	A	N	A	N	A	N	A	N
7	FLANGE	A	N	A	N	A	N	A	N	A	N
8	BALL VALVE	A	N	A	N	A	N	A	N	A	N
9	FLANGE	A	N	A	N	A	N	A	N	A	N
10	EMERGENCY FIRE VALVE	A	N	A	N	A	N	A	N	A	N
11	FLANGE	A	N	A	N	A	N	A	N	A	N
12	NOT USED	A	N	A	N	A	N	A	N	A	N
13	NOT USED	A	N	A	N	A	N	A	N	A	N
14	NOT USED	A	N	A	N	A	N	A	N	A	N
15	MANWAY ON SIDE OF TANK	A	N	A	N	A	N	A	N	A	N
16	NOT USED	A	N	A	N	A	N	A	N	A	N
17	IN LINE STRAINER	A	N	A	N	A	N	A	N	A	N
18	DIRTY SOLVENT DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
19	NOT USED	A	N	A	N	A	N	A	N	A	N
20	NOT USED	A	N	A	N	A	N	A	N	A	N
21	BALL VALVE – DRUM WASHER TO DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
22	NOT USED	A	N	A	N	A	N	A	N	A	N
23	NOT USED	A	N	A	N	A	N	A	N	A	N
24	BALL VALVE – DRUM WASHER TO RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
25	FLANGE	A	N	A	N	A	N	A	N	A	N
26	~~NOT USED~~	A	N	A	N	A	N	A	N	A	N
27	FLANGE	A	N	A	N	A	N	A	N	A	N
28	RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
29	~~NOT USED~~	A	N	A	N	A	N	A	N	A	N
30	~~NOT USED~~	A	N	A	N	A	N	A	N	A	N
31	~~NOT USED~~	A	N	A	N	A	N	A	N	A	N
32	~~NOT USED~~	A	N	A	N	A	N	A	N	A	N
33	BALL VALVE – RECIRC PUMP DISCHARGE	A	N	A	N	A	N	A	N	A	N
34	BALL VALVE – RECIRIC PUMP DISCHARGE TO DRUM WASHER	A	N	A	N	A	N	A	N	A	N
35	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N
36	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N

Deleted: AUTOMATIC VALVE – DRUM WASHER TO RECIRCULATING PUMP

Deleted: FLANGE – EXIT AUTOMATIC VALVE FROM REUSE VAT

Deleted: AUTOMATIC VALVE FROM REUSE VAT

Deleted: FLANGE – INLET TO REUSE VAT AUTOMATIC VALVE

Deleted: BALL VALVE – REUSE VAT DRAIN

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, does not operate smoothly, 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**
Draw a line through pump and valve I.D. numbers that do not apply

SUBPART BB EQUIPMENT INVENTORY

Listed on the attached master list is all equipment at the facility which is subject to the requirements of 40 CFR 264 and 265, Subpart BB. The numbered equipment is also identified on the attached Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste tank system is spent mineral spirits containing one or more of the following waste codes: D001, D004-D011, D018, D019, D021-D030 and D032-D043. Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic but may contain water. The vapor pressure of the bulked spent mineral spirits at 60° F as provided in Attachment 5-2, Table 1, is less than 0.3 kPa at 20° C and is thus defined as heavy liquid under the cited regulations.

Compliance with the standard (264.1058) will be achieved through facility inspections conducted each operating day, and if required, leak repair. Records of equipment leaks and repair are maintained on the Tank Farm Inspection Record page 3 of 3, Subpart BB Inspections conducted each operating day.

<u>If a leak is discovered (by visual evidence or excessive odor) note it as "N" on the form and write the number or description of the leaking item on the inspection record.</u>

<u>Leak Detection and Repair Record</u>

After detection of a leak, a repair must be made within 15 days. Note the repair on the Subpart BB inspection record, page 3 of 3 of the Tank Farm inspections.

DATE 12-16-2009

MASTER LIST

BRANCH # 7-008-21

PREPARER'S SIGNATURE _____

HAZARDOUS WASTE – HEAVY LIQUID

INDIVIDUAL NUMBER	TYPE	HAZARDOUS WASTE MANAGEMENT UNIT	GENERAL LOCATION *
1	NOT USED	NA	NA
2	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
3	BALL VALVE	TANK SYSTEM	TANKER ACCESS BOX
4	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
5	CHECK VALVE	TANK SYSTEM	TANKER ACCESS BOX
6	FLANGE	TANK SYSTEM	TANKER ACCESS BOX
7	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
8	BALL VALVE	TANK SYSTEM	BOTTOM OUTLET TANK
9	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
10	EMERGENCY FIRE VALVE	TANK SYSTEM	BOTTOM OUTLET TANK
11	FLANGE	TANK SYSTEM	BOTTOM OUTLET TANK
12	NOT USED	NA	NA
13	NOT USED	NA	NA
14	NOT USED	NA	NA
15	SIDE MANWAY	TANK SYSTEM	TANK SIDE AT BOTTOM
16	NOT USED	NA	NA
17	IN LINE STRAINER	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT
18	DIRTY SOLVENT DISCHARGE PUMP	TANK SYSTEM	UNDER RETURN & FILL GRATE
19	NOT USED	NA	NA
20	NOT USED	NA	NA
21	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
22	NOT USED	NA	NA
23	NOT USED	NA	NA
24	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
25	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
26	NOT USED	NA	NA
27	FLANGE	TANK SYSTEM	UNDER RETURN & FILL GRATE
28	RECIRCULATION PUMP	TANK SYSTEM	UNDER RETURN & FILL GRATE
29	NOT USED	NA	NA
30	NOT USED	NA	NA
31	NOT USED	NA	NA
32	NOT USED	NA	NA
33	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
34	BALL VALVE	TANK SYSTEM	UNDER RETURN & FILL GRATE
35	BALL VALVE, SUMP SUCTION	TANK SYSTEM	UNDER RETURN & FILL GRATE
36	BALL VALVE, SUMP SUCTION	TANK SYSTEM	UNDER RETURN & FILL GRATE
RETURN & FILL**	NON-FLANGE FITTINGS	TANK SYSTEM	UNDER RETURN & FILL GRATE
TANK FARM ***	NON-FLANGE FITTINGS	TANK SYSTEM	TANK FARM SECONDARY CONTAINMENT AREA

* See Subpart BB drawing for more specific locations.

** All non-flanged fittings under the Return & Fill grating except the drip pan drain

*** All non-flanged fittings in the waste solvent tank farm secondary containment area are marked with brown color or are connected to piping that marked with brown color.

VALVE, FLANGE, PUMP
ID & LOCATION DRAWING

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	NOT USED *	A**	N	A	N	A	N	A	N	A	N
2	FLANGE	A	N	A	N	A	N	A	N	A	N
3	BALL VALVE	A	N	A	N	A	N	A	N	A	N
4	FLANGE	A	N	A	N	A	N	A	N	A	N
5	CHECK VALVE	A	N	A	N	A	N	A	N	A	N
6	FLANGE	A	N	A	N	A	N	A	N	A	N
7	FLANGE	A	N	A	N	A	N	A	N	A	N
8	BALL VALVE	A	N	A	N	A	N	A	N	A	N
9	FLANGE	A	N	A	N	A	N	A	N	A	N
10	EMERGENCY FIRE VALVE	A	N	A	N	A	N	A	N	A	N
11	FLANGE	A	N	A	N	A	N	A	N	A	N
12	NOT USED	A	N	A	N	A	N	A	N	A	N
13	NOT USED	A	N	A	N	A	N	A	N	A	N
14	NOT USED	A	N	A	N	A	N	A	N	A	N
15	MANWAY ON SIDE OF TANK	A	N	A	N	A	N	A	N	A	N
16	NOT USED	A	N	A	N	A	N	A	N	A	N
17	IN LINE STRAINER	A	N	A	N	A	N	A	N	A	N
18	DIRTY SOLVENT DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
19	NOT USED	A	N	A	N	A	N	A	N	A	N
20	NOT USED	A	N	A	N	A	N	A	N	A	N
21	BALL VALVE – DRUM WASHER TO DISCHARGE PUMP	A	N	A	N	A	N	A	N	A	N
22	NOT USED	A	N	A	N	A	N	A	N	A	N
23	NOT USED	A	N	A	N	A	N	A	N	A	N
24	BALL VALVE – DRUM WASHER TO RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
25	FLANGE	A	N	A	N	A	N	A	N	A	N
26	NOT USED	A	N	A	N	A	N	A	N	A	N
27	FLANGE	A	N	A	N	A	N	A	N	A	N
28	RECIRCULATION PUMP	A	N	A	N	A	N	A	N	A	N
29	NOT USED	A	N	A	N	A	N	A	N	A	N
30	NOT USED	A	N	A	N	A	N	A	N	A	N
31	NOT USED	A	N	A	N	A	N	A	N	A	N
32	NOT USED	A	N	A	N	A	N	A	N	A	N
33	BALL VALVE – RECIRC PUMP DISCHARGE	A	N	A	N	A	N	A	N	A	N
34	BALL VALVE – RECIRIC PUMP DISCHARGE TO DRUM WASHER	A	N	A	N	A	N	A	N	A	N
35	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N
36	BALL VALVE – SUMP SUCTION LINE	A	N	A	N	A	N	A	N	A	N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, does not operate smoothly, 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**
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