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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 30, 2010

Randy Shaner
Environment, Health and Safety Manager
Safety-Kleen Systems, Inc.
4210 Hawkins Rd.
Farmington, NM 87401

**RE: APPROVAL WITH MODIFICATIONS
CLASS 1 (WITH PRIOR APPROVAL) PERMIT MODIFICATION
SAFETY-KLEEN, FARMINGTON, NM, EPA ID# NMD980698849
HWB-SKFA-10-002**

Dear Mr. Shaner:

The New Mexico Environment Department (NMED) hereby approves, with modifications, Safety-Kleen System's December 29, 2009 request for a Class 1 (with prior approval) permit modification to Safety-Kleen's Farmington Storage Facility's RCRA Permit Number NMD980698849. The modifications approved apply to Permit Attachment 5, *Inspection Plan and Schedule*.

This modification request was submitted to satisfy a Notice of Violation (NOV) issued to Safety-Kleen by the NMED on October 19, 2009. Items number 1 and 2 of the NOV were addressed in this Permit modification request. Item number 1 specified that Safety-Kleen failed to submit a permit modification to NMED with an accurate Master List of all locations at the facility subject to the air emission control requirements at 40 CFR Part 264, Subparts BB and CC. The Master List and other equipment lists in Attachment 5-3 of Permit Attachment 5 have never been updated. The Master List did not match the current configuration of equipment subject to Subpart BB at the facility or the other lists and drawings in Attachment 5-3. Furthermore, in Permit Attachment 5, the daily, weekly, and annual inspection forms in Attachment 5-1 and the Subpart CC Visual Inspection Checklist for End of Week Container Inspections and Annual Visual Tank Inspections forms in Attachment 5-2 did not match up with the item numbers from

the lists and drawings in Attachment 5-3 and the as-built conditions.

Item number 2 of the NOV specified that Safety-Kleen failed to mark each piece of equipment to which 40 CFR Part 264 Subpart BB applies. Equipment, such as tanks, drum washer, flanges, pumps, valves, and other ancillary equipment for the hazardous waste tank system, must be marked in such a manner that it can be readily distinguished from other pieces of equipment.

This Permit modification request and an inspection of the facility on June 2, 2010 confirm that these two NOV items have been satisfactorily resolved.

Regarding the permit modification request as a whole, the NMED hereby approves the requested modifications, with the exception of the following, as presented in the permit modification request letter:

Attachment 5, Section 5.1, New 7th Paragraph

Safety-Kleen proposed that this paragraph be added to define the term 'operating day'. The definition proposed by Safety-Kleen reads as follows: "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." The NMED has modified the definition of an 'operating day' to read as follows: "Operating day is defined as any business day when branch employees are handling or managing waste at the facility, including Saturdays, Sundays and holidays."

Attachment 5, Section 5.2, Inspection Schedule and Checklist, Item #1

Safety-Kleen proposed making some grammatical changes in Sections 5.2 and 5.2.1. These changes included replacing the term "shall be" with "are" and "is". The NMED declines to make this modification as the term "shall be" is consistent with the terms of the Permit.

Inspection Log Sheet (Safety and Emergency Equipment, Security Devices and Miscellaneous Equipment)

NMED has modified the proposed log sheet format. Under "Safety and Emergency Equipment", the second iteration of "Eyewash and Shower" has been replaced with "Personal Protection Equipment" as presented in the original log sheet.

Leak Detection and Repair Record

NMED has deleted this form as it is not required. Leak detection and repair activities are recorded on the individual inspection log sheets.

Subpart CC Visual Inspection Checklist

Safety-Kleen proposed that the title be changed from "Checklists" to "Checklist" since it is just one checklist. It is, in fact, two checklists on one sheet. Therefore, NMED declined to make the requested modification.

The Numbering of Subpart BB Fittings

Based on 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. Therefore, Safety-Kleen proposed that all 'numbered' fittings that are not flanges be removed from the Master List and from the Subpart BB drawing. NMED declines to make the requested modification. As EPA stated, all fittings (flanges or not) must still be inspected for leaks. All Subpart BB fittings must therefore be tagged and included on the Master List.

A clean copy of the modified pages, forms and the drawing for Permit Attachment 5 are attached. These pages must be incorporated into the facility Permit and the Operating Record.

If you have any questions regarding this letter, please contact David Strasser of my staff at (505) 222-9526.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
A. Vollmer, NMED HWB
W. Moats, NMED HWB
D. Strasser, NMED HWB
L. King, EPA Region 6 (6PD-N)
File: SKFA 2010 and Reading
HWB-SKFA-10-002

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)), which shall be located on-site.

The Service Center Branch Manager or designate is responsible for conducting and documenting Facility inspections every operating day but not less frequently than weekly in accordance with this Permit. The Branch Manager 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 inspections 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 checklist entries to make the emergency coordinator aware of spills or other emergencies, but shall provide immediate verbal notification.

Operating day is defined as any business day when branch employees are handling or managing waste at the facility, including Saturdays, Sundays and holidays.

5.2 Inspection Schedule and Checklist

Permit Attachment 5-1 contains applicable inspection forms that shall be used at the Facility. Changes in the format of these inspection forms 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 shall be placed on the schedule that is appropriate for the frequency of inspection to be performed. There is a section on each form for recording the name of the inspector, the date of the inspection, the nature of repairs performed and/or remedial action taken, with comments. The schedules shall be 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 shall 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 storage tank shall be checked for cracks or other deterioration and for evidence of precipitation accumulation or spills each operating day. Any damage to the spent solvent 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.

5.2.2 Reserved

5.2.3 Container Storage Unit

The Container Storage Unit (CSU) area shall be inspected each operating day 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 5-3
EQUIPMENT INVENTORY FOR INSPECTIONS**

**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.

ATTACHMENT 5-2
VAPOR PRESSURE SUMMARY AND SUBPART CC COMPLIANCE

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

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
2 FLANGE	A	N	A	N	A	N
3 BALL VALVE	A	N	A	N	A	N
4 FLANGE	A	N	A	N	A	N
5 CHECK VALVE	A	N	A	N	A	N
6 FLANGE	A	N	A	N	A	N
7 FLANGE	A	N	A	N	A	N
8 BALL VALVE	A	N	A	N	A	N
9 FLANGE	A	N	A	N	A	N
10 EMERGENCY FIRE VALVE	A	N	A	N	A	N
11 FLANGE	A	N	A	N	A	N
12 PIPE NIPPLE	A	N	A	N	A	N
13 PIPE BELL REDUCER	A	N	A	N	A	N
14 THREADED PLUG IN TANK WALL	A	N	A	N	A	N
15 MANWAY ON SIDE OF TANK	A	N	A	N	A	N
16 THREADED PLUG IN TANK WALL	A	N	A	N	A	N
17 IN LINE STRAINER	A	N	A	N	A	N
18 DIRTY SOLVENT DISCHARGE PUMP	A	N	A	N	A	N
19 CAMLOCK FITTING SUCTION DISCHARGE PUMP	A	N	A	N	A	N
20 CAMLOCK FITTING	A	N	A	N	A	N
21 BALL VALVE - DRUM WASHER TO DISCHARGE PUMP	A	N	A	N	A	N
22	A	N	A	N	A	N
23	A	N	A	N	A	N
24 BALL VALVE - DRUM WASHER TO RECIRCULATION PUMP	A	N	A	N	A	N
25 FLANGE	A	N	A	N	A	N
26 AUTOMATIC VALVE - DRUM WASHER TO RECIRCULATING PUMP	A	N	A	N	A	N
27 FLANGE	A	N	A	N	A	N
28 RECIRCULATION PUMP	A	N	A	N	A	N
29 FLANGE - EXIT AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N
30 AUTOMATIC VALVE FROM REUSE VAT	A	N	A	N	A	N
31 FLANGE - INLET TO REUSE VAT AUTOMATIC VALVE	A	N	A	N	A	N
32 BALL VALVE - REUSE VAT DRAIN	A	N	A	N	A	N
33 BALL VALVE - RECIRC PUMP DISCHARGE	A	N	A	N	A	N
34 BALL VALVE - RECIRC PUMP DISCHARGE TO DRUM WASHER	A	N	A	N	A	N
35 BALL VALVE - SUMP SUCTION LINE	A	N	A	N	A	N
36 BALL VALVE - SUMP SUCTION LINE	A	N	A	N	A	N
37	A	N	A	N	A	N
38	A	N	A	N	A	N
39	A	N	A	N	A	N
40	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: _____

Personal Protection Equipment: A N
 If 'N', circle appropriate problem: inadequate supply of or malfunctioning or inadequate aprons, gloves, glasses, respirators or emergency respirators, emergency respirators missing components, items requiring security or clean equipment are exposed to the environment, 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)

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 CONTAINER STORAGE AREA**

DESCRIPTION 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)

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)

**SUBPART BB
VALVE, FLANGE, PUMP
ID & LOCATION DRAWING**

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, 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, and 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.

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	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.

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: _____

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 wastes 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 m³ (about 26 gallons) and in containers less than 0.46 m³ 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 m³ = 121.5 gal; 0.1 m³ = 26.4 gal; 75 m³ = 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

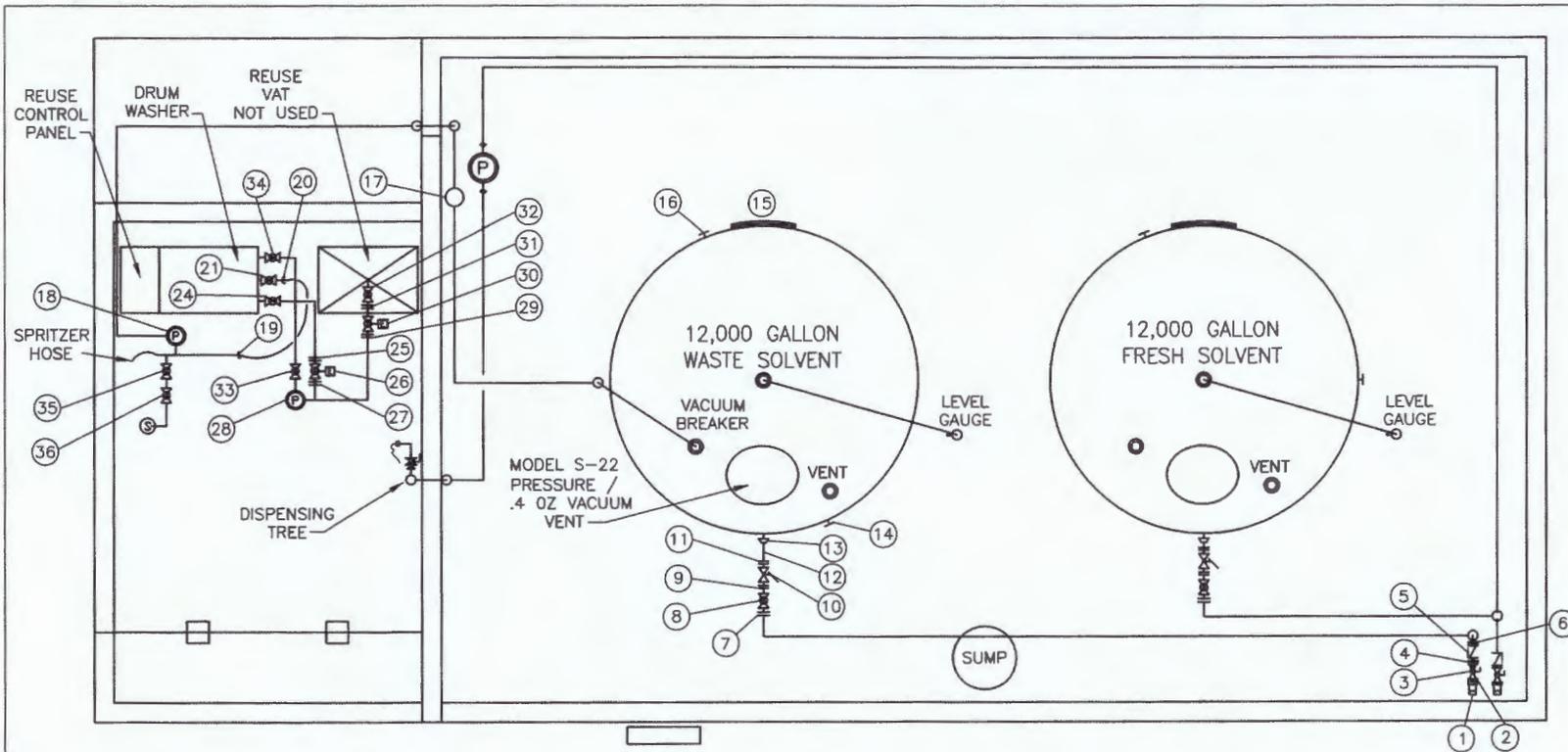
Documentation of tank and tank cover design: See Permit.

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.



SYMBOL LIST	
C	CARLOCK COUPLING
⊘	BALL VALVE
⊘	INTERNAL EMERGENCY VALVE
⊘	CHECK VALVE
⊘	STRAINER
P	PUMP
⊘	REDUCER
+	FLANGE
⊘	AUTOMATIC (ELECTRONIC) BALL VALVE

GENERAL NOTES

L PIPING AND TAGGING FIELD VERIFIED ON 12-16-99 BY S-W

PROPRIETARY STATEMENT

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Project Solutions

3055 West Broadway • Suite 210 • Columbia • MO 65203
 • Phone (314) 443-7100 • Fax (314) 443-7181 •



FITTING SCHEDULE			
1	CARLOCK CAP	19	CARLOCK FITTING BENCH PUMP SUCTION
2	FLANGE	20	CARLOCK 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 HANWAY	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/T SUMP SUCTION LINE
18	DIRTY SOLVENT DISCHARGE PUMP	36	BALL VALVE R/T SUMP SUCTION LINE

REVISIONS										
NO.	DESCRIPTION	BY	CHK	APPR	DATE	SCALE	BY	CHK	APPR	DATE
A	REVISED FOR COMMENTS	JDK	RS	RS	12/29/99	SCALE	BY	CHK	APPR	DATE
B	ISSUED FOR REVIEW	JDK	RS	RS	12/17/99	SCALE	BY	CHK	APPR	DATE

SAFETY-KLEEN SYSTEMS, INC.
 3055 West Broadway • Suite 210 • Columbia • MO 65203
 Phone: (314) 443-7100 • Fax: (314) 443-7181

TITLE TANK FARM - R/F PART BB
 TAGGING PLAN

FARMINGTON, N.M. 7133-4100-350

1ATTACHMENT 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)), which shall be located on-site ~~in the office of the Branch Manager.~~

The Service Center Branch Manager or designate is responsible for conducting and documenting Facility inspections ~~on a daily~~ basisevery operating day but not less frequently than weekly in accordance with this Permit. The Branch Manager 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 ~~Technical Services Department at Safety-Kleen's corporate headquarters shall be notified for assistance~~ Service Center Branch Manager will obtain assistance from outside the branch. Completion of repairs shall also be noted ~~in on the inspection record or elsewhere in~~ the Facility Operating Record.

Safety-Kleen employees shall make ~~daily rounds inspections~~ of the facility each operating day to detect any unauthorized entry to the Facility or any other abnormalities. The employees shall not ~~use rely upon inspection checklist entries to make the emergency coordinator aware of spills or other emergencies, inspection checklists, but they shall notify the emergency coordinator and/or emergency response personnel of any spills or other emergencies~~ but shall provide immediate verbal notification.

Operating day is defined as any business day when branch employees are handling or managing waste at the facility, including Saturdays, Sundays and holidays.

5.2 Inspection Schedule and Checklist

Permit Attachment 5-1 contains applicable inspection forms that shall be used at the Facility. Changes in the format of these inspection forms 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 shall be placed on the schedule that is appropriate for the frequency of inspection to be performed. There is a section on each form for recording the name of the inspector, the date of the inspection, the nature of repairs performed and/or remedial action taken, with comments. The schedules shall be maintained and kept at the Facility.

5.2.1 Tank Inspections

The 12,000-gallon above ground storage tanks holding the ~~solvent product and~~ spent solvent shall be inspected ~~daily~~ each operating day. The inspections shall include checks of the high level alarm and the volume held in the tanks. Sudden deviations in the tank volumes will be investigated and their causes determined. If necessary, repairs shall be initiated immediately. ~~When the spent solvent storage tank is approximately 85% full, a pickup~~

~~shall be scheduled with Safety-Kleen's corporate dispatch department.~~ 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 tanks ~~are~~is also inspected for 40 CFR 264 Subpart CC compliance.

The secondary containment for the spent solvent storage tanks shall ~~also~~ be checked for cracks or other deterioration and for evidence of precipitation accumulation or spills each operating day. Any damage to the ~~above ground~~spent solvent storage tanks 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.

5.2.2 ~~Solvent Dispensing Equipment~~Reserved

~~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.~~

5.2.3 Container Storage Unit

The Container Storage Unit (CSU) area shall be inspected ~~on a daily basis~~each operating day 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 ~~Route Vehicles~~Reserved

~~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 daily 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.

ATTACHMENT 5-2
VAPOR PRESSURE SUMMARY AND SUBPART CC COMPLIANCE

**ATTACHMENT 5-3
EQUIPMENT INVENTORY FOR INSPECTIONS**

**** 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**

DESCRIPTION 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)				
_____ 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": _____

* 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)

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

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S SIGNATURE INITIALS:

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

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

TIME

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

(WASTE SOLVENT TANKS MUST NEVER BE NOT MORE THAN 95% FULL!)

Waste Solvent _____ *

Tank (ft & in./gal.)

_____ Premium Solvent Product

_____ Tank (ft & in./gal.)

MON. TUES. WED. THURS. FRI.

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)

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

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S SIGNATURE/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

* 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

~~EXAMPLE~~ INSPECTION LOG SHEET FOR:
 Weekly Inspection of **SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES
 AND MISCELLANEOUS EQUIPMENT**

INSPECTOR'S NAME / INITIALS / TITLE _____

INSPECTOR'S SIGNATURE/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, ~~wet/dry vacuum~~, other: _____

Personal Protection Equipment: A N
 If 'N', circle appropriate problem: inadequate supply of or malfunctioning or inadequate aprons, gloves, glasses, respirators or emergency respirators, emergency respirators missing components, items requiring security or clean equipment are exposed to the environment, 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: _____

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": _____

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

LEAK DETECTION AND REPAIR RECORD

EQUIPMENT I.D. # _____

BRANCH # _____

DESCRIPTION

HOW WAS THE POTENTIAL OR ACTUAL
LEAK DETECTED?

DATE

INSPECTOR'S SIGNATURE

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)

INSTRUMENT # / OPERATOR
CALIBRATION
BACKGROUND READING
READING AT EQUIPMENT
LEAK DETECTED?

(1)	(2)	(3)	(4)	(5)	(6)
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

ATTACH ANY DOCUMENTATION PREPARED BY THE CONSULTANT

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: _____

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	psia	K Pa	atm	mm-Hg	psia	K Pa	Atm
S-K 105 <u>Recycled</u>	6614 (CA) 6617 (Non-CA)	<u>20.4</u>	<u>0.039</u>	<u>0.267</u> <u>0.053</u>	<u>.003</u>	<u>61.0</u>	<u>0.116</u>	<u>0.800</u> <u>0.133</u>	<u>0.008</u>
<u>S-K 140</u>	<u>6616</u>	<u><1</u>	<u><0.19</u>	<u><0.133</u>	<u><0.001</u>	<u>1.5</u>	<u>0.029</u>	<u>0.200</u>	<u>0.002</u>
<u>SK 105</u> <u>Virgin</u>	<u>6610</u>	<u>0.81</u>		<u>0.108</u>		<u>1.0</u>		<u>0.133</u>	
S-K 150 Premium	6605 <u>6616</u>	<u>.60.2</u>	<u>0.012</u>	<u>0.080</u> <u>0.0267</u>	<u>0.001</u>	<u>1.70.6</u>	<u>0.033</u>	<u>0.227</u> <u>0.08</u>	<u>0.002</u>
Immersion Cleaner	699	<u><0.41</u>	<u><0.0079</u>	<u><0.0545</u>	-	-	-	-	-
<u>Aetrel-PC-</u> <u>95</u>	<u>6608</u>	<u>.02</u>	<u>0.0004</u>	<u>0.003</u>	<u>0.001</u>	-	-	-	-
Heavy Duty Lacquer Thinner	6782 <u>MSDS</u>	<u>75-94.7</u> <u>86</u>	<u>1.45-1.83</u>	<u>10-12.6</u> <u>11.5</u>	<u>0.10-0.134</u>	-	-	-	-
Low V.P. Lacquer Thinner	<u>66646874</u>	<u>24-35</u>	<u>0.46-0.68</u>	<u>3.20-4.67</u>	<u>0.03-0.05</u>	-	-	-	-
<u>Bulked</u> <u>Waste</u> <u>Solvent</u>	<u>NA</u>	<u>0.57 Ave</u> <u>0.96 Max</u>		<u>0.076</u> <u>0.128</u>		=		=	

(US) Light liquid service > 0.3 KPa @ 20° C
~~waste-solvent~~

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 ~~Operation Plan/Permit~~. For those hazardous wastes which are managed on a transfer basis, and which are not described in the ~~Operation Plan/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 ~~Operation Plan/Permit~~. Certain features of these units, as they relate to the Subpart CC standards, are described below.

Waste mineral spirits ~~USTs and~~ 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 20,000 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 ~~≈ 0.2 psia. 264.1084(b)(1)(i)(4)~~ 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 ~~Operations Plan/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. ~~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.~~

The drum washing units at this facility ~~are is a~~ fixed roof, Level 1 tanks. ~~These This unit tanks are 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 ~~Operation Plan/~~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 m³ (about 26 gallons) and in containers less than 0.46 m³ or about 122 gallons. ~~In addition, containers~~ 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. ~~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.~~ (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. ~~In addition, all Safety-Kleen containers used to manage wastes and~~ comply with applicable U.S. DOT regulations on packaging hazardous materials for transportation.

(122 gal = 0.46 m³ = 121.5 gal; 0.1 m³ = 26.4 gal; 75 m³ = 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 ~~Tanks No. _____~~ the waste solvent tank which could result in air pollutant emissions.

Visual tanks inspections shall be conducted on an annual basis.

Recordkeeping

Documentation of tank and tank cover design: See ~~Operation Plan/~~Permit.

Documentation of waste determination: See ~~Waste Characteristics portion of the Operation Plan/Permit~~ Attachment 5-2 Table 1.

Records of all visual inspection: See daily facility inspection records, ~~and enclosed record of initial tank inspection.~~

Listing of all tanks, by unique identifying number, which are difficult or unsafe to inspect: ~~See enclosed~~ 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 ~~Operation Plan/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 **in January and once in July 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

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

Listed on the attached ~~pump list and valve~~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 ~~site plan~~Subpart BB drawing.

The hazardous waste influent to and effluent from the hazardous waste ~~management unit(s)~~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 0.27 kPa (equivalent to 2 mm Hg—see MSDS and the attached EPA guidance document page) provided in Attachment 5-2, Table 1, and is less than 0.3 kPa at 20° C and is thus. ~~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 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 detection monitoring and~~ repair. The facility inspection record has been updated to include a detailed daily equipment inspection. Records of equipment ~~monitoring and~~ repair are maintained on a separate form in the operating 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 bbBB leak. Safety-Kleen takes the conservative approach and fixes all potential subpart bbBB 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.

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. Leak Detection and Repair Record

After detection of a potential ~~or actual~~ leak, a 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 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 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.~~

~~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).~~

1 1/2"	45	UNION	DISCHARGE SIDE OF RECIRCULATING PUMP INSIDE BARREL, WASHER RIGHT SIDE
1 1/2"	43	UNION	DISCHARGE SIDE OF RECIRCULATING PUMP MID-RIGHT SIDE OF BARREL WASHER
1 1/2"	42	UNION	DISCHARGE SIDE OF RECIRCULATING PUMP LOWER RIGHT SIDE OF BARREL WASHER
2"	46	UNION	SUCTION SIDE RECIRCULATING PUMP LOWER RIGHT SIDE OF BARREL WASHER
2"	14	FLANGE/UNION	DISCHARGE SIDE OF TRASH PUMP LOWER LEFT SIDE OF BARREL WASHER
3"	20	FLANGE	OPTIONAL/UNION WASTE TANK PICK-UP BOTTOM/CENTER/FRONT
3"	21	FLANGE	OPTIONAL/UNION WASTE TANK PICK-UP AT TANK CONNECTION SE CORNER OF CONTAINMENT
1"	3	SWING VALVE	SWING VALVE CUT-OFF FOR DRIP CAN CONTAINMENT

9/12-16-2009

DATE 03-07

MASTER LIST

BRANCH # 7-

008-21

PREPARER'S

HAZARDOUS WASTE - HEAVY LIQUID

SIGNATURE

SIZE	INDIVIDUAL NUMBER	TYPE	HAZARDOUS WASTE MANAGEMENT UNIT	GENERAL LOCATION *
1 1/2"	145	CAMLOCK CAP UNION	TANK FARM DISCHARGE SIDE OF RECIRCULATING PUMP INSIDE BARREL, WASHER RIGHT SIDE	Refer to site plan TANKER ACCESS BOX
1 1/2"	244	FLANGE BALL VALVE	TANK FARM ON/OFF DISCHARGE SIDE OF RECIRCULATING PUMP MID-RIGHT SIDE BARREL	TANKER ACCESS BOX

			WASHER	
1 1/2 2	343	BALL VALVE UNION	TANK FARM DISCHARGE SIDE OF RECIRCULATING PUMP MID-RIGHT SIDE OF BARREL WASHER	TANKER ACCESS BOX
1 1/2 2	442	FLANGE UNION	TANK FARM DISCHARGE SIDE OF RECIRCULATING PUMP LOWER-RIGHT SIDE OF BARREL WASHER	TANKER ACCESS BOX
-	54	CHECK VALVE PUMP	TANK FARM RECIRCULATING PUMP LOWER-RIGHT SIDE OF BARREL WASHER	TANKER ACCESS BOX
2 2	646	FLANGE UNION	TANK FARM SUCTION SIDE RECIRCULATING PUMP LOWER-RIGHT SIDE OF BARREL WASHER	TANKER ACCESS BOX
2 2	726	FLANGE BALL VALVE	TANK FARM ON/OFF SUCTION SIDE TRASH PUMP CENTER UNDER BARREL WASHER	BOTTOM OUTLET TANK
-	85	BALL VALVE PUMP	TANK FARM TRASH PUMP LOWER-LEFT FRONT OF BARREL WASHER	BOTTOM OUTLET TANK
2 2	914	FLANGE FLANGE UNION	TANK FARM DISCHARGE SIDE OF TRASH PUMP LOWER-LEFT FRONT OF BARREL WASHER	BOTTOM OUTLET TANK
2 2	1047	EMERGENCY FIRE VALVE BALL VALVE	TANK FARM ON/OFF SUCTION SIDE OF TRASH PUMP FOR SUMP LOWER-LEFT SIDE OF PUMP	BOTTOM OUTLET TANK
3 2	1118	FLANGE INTERNAL VALVE	TANK FARM INTERNAL EMERGENCY VALVE (UPPER POSITION) WASTE TANK PICK-UP BOTTOM CENTER	BOTTOM OUTLET TANK
3 2	1219	PIPE NIPPLE GATE VALVE	TANK FARM GATE VALVE (LOWER POSITION) (NON-LOCKING) WASTE TANK PICK-UP BOTTOM/CENTER/FRO NT	BOTTOM OUTLET TANK
3 2	1320	PIPE BELL REDUCER FLANGE	TANK FARM OPTIONAL UNION WASTE TANK PICK-UP BOTTOM/CENTER/FRO NT	BOTTOM OUTLET TANK
3	1421	THREADED PLUG FLANGE	TANK	TANK SIDE BY OUTLET PIPING

22			FARMOPTIONAL/UNION WASTE TANK PICK-UP AT TANKER CONNECTION SE CORNER OF CONTAINMENT	
3	1522	SIDE MANWAYS WING GATE VALVE	TANK FARM SWING CHECK VALVE WASTE TANK PICK-UP AT TANKER CONNECTION SE CORNER OF CONTAINMENT	TANK SIDE AT BOTTOM
3	1623	THREADED PLUG LOCKING GATE VALVE	TANK FARM LOCKING GATE VALVE WASTE TANK PICK-UP AT TANKER CONNECTION SE CORNER OF CONTAINMENT	TANK SIDE BY BOTTOM MANWAY
2	1745	IN LINE STRAINER FLANGE	TANK FARM FLANGE/UNION	TANK FARM SECONDARY CONTAINMENT
3	1847	DIRTY SOLVENT DISCHARGE PUMP FLANGE	TANK FARM LOCKING GATE VALVE	UNDER RETURN & FILL GRATE
3	1924	CAM LOCK FITTING FLANGE	TANK FARM LOCKING GATE VALVE	UNDER RETURN & FILL GRATE
	20	CAM LOCK 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.

DRAWING

**PRELIMINARY VALVE, FLANGE, PUMP
AND
EQUIPMENT DESIGNATION SYSTEM ID & LOCATION DRAWING**

~~(THIS IS A PROPOSED ISOMETRIC DRAWING OF THE TANK FARM & RETURN AND FILL WITH PIPES AND VALVES THAT IS TO SHOW THE PLACEMENT OF SUBPART BB TAGS)~~

~~A HAND DRAWN SCHEMATIC OF SOMETHING ON GRAPH PAPER~~

-

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

**SUBPART BB INSPECTION
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~~