



November 28, 2018

CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

RE: Waste Minimization Certification & Plan for 2018
Farmington Branch
Safety-Kleen Systems, Inc., EPA ID # NMD980698849
4210 A Hawkins Rd, Farmington, NM 87401

Dear Manager:

Enclosed is the Waste Minimization Certification and Plan for 2018 as required by Part 2, Condition 2.4.3 of the facility's RCRA Part B Permit.

If you have any questions, feel free to contact me at 714-429-4355.

Sincerely,

Nahid Toossi, C.H.M.M
Director Environmental Compliance
Nahid.toossi@safety-kleen.com

Enclosures : 2018 Waste Minimization Report

cc: File 2020

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Annual Waste Minimization Report

Safety-Kleen Systems, Inc.
Farmington, NM

EPA ID Number. EPA ID # NMD980698849

The Safety-Kleen Farmington Service Center implements and maintains a Waste Minimization Plan to minimize the amount and toxicity of hazardous wastes generated at this facility to a degree economically practicable, and that the method utilized for the treatment, storage, or disposal of hazardous waste is the practicable method currently available to this facility which minimizes the present and future threat to human health and the environment. The Plan includes:

1. Sections 3 and 4 of the Waste Minimization Plan address reducing the volume and toxicity of hazardous waste and the recycling of hazardous waste.
2. Section 5.3 of the Waste Minimization Plan addresses Employee training to identify and implement source reduction and recycling opportunities. In addition Attachment A of the Plan includes a Waste Minimization Suggestion Submittal Form to encourage employees to submit ideas to management.
3. Section 9.2 of the Waste Minimization Plan addresses minimization and recycling implemented over the last year and Section 9.3 addresses additional waste efforts that could be implemented at the facility next year.
4. Section 9.5 of the Waste Minimization Plan addresses costs associated to waste minimization and recycling of hazardous waste.

As described in the Plan, the wastes that appear on shipping documents as if they have been generated by Safety-Kleen, are actually generated by customers of Safety-Kleen. These wastes are stored in tanks and/or in containers and subsequently shipped off site to other facilities. Safety-Kleen relies mostly on source reduction for on-site processes that may generate waste, such as washing the parts washer drums returning from customers, the use of re-usable metal filters rather than disposable, and segregation of more toxic wastes from less toxic wastes to reduce the toxicity of larger quantity waste streams. Waste generated by Safety-Kleen year over year is directly related to the volume of customer generation. See matrix below.

Hazardous Waste Generation Matrix

Location	Description of Waste	Pounds Generated 2017 (January 1 to December 1, 2017)	Pounds Generated 2018 (January 1 to September 30, 2018)
Return and Fill Station	Hazardous Waste Debris	5,136	2,795
	Drum Washer Sediment		1,104
Warehouse	Used oil retain samples	1,450	995
Total		6,586	4,894