

VIA FEDERAL EXPRESS TRK #774316197004

January 25, 2019

Mr. John Kieling, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

**RE: Request to change due date for Annual Inflation Increase
Closure Policy PEC000659417**
Safety-Kleen Systems, Inc.
Albuquerque – EPA ID No. NMD000804294
Farmington – EPA ID No. NMD980698849

Dear Mr. Kieling:

Historically the Annual Inflation Increases for the Safety-Kleen facilities referenced above has been submitted by January 25th. At this time, I would like to request that the due date of the annual inflation increase be moved to November 17th, so that it falls on the same date as the policy renewal. Please provide a response in writing so that our insurance carrier will have record of your approval to change the inflation due date.

If you have any questions regarding this submittal, please feel free to contact me at Harvey.Pamela@cleanharbors.com or 219-746-5050.

Sincerely,

A handwritten signature in black ink that reads "Pamela K. Harvey".

Pamela K. Harvey, CHMM
Environmental Compliance Manager



PROTECTION CHOICES PEOPLE
MAKE GREEN WORK

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Mr. John Kieling, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

RE: Annual Inflation Increase for Closure Policy PEC000659417
Safety-Kleen Systems, Inc.
Albuquerque – EPA ID No. NMD000804294
Farmington – EPA ID No. NMD980698849

Dear Mr. Kieling:

Enclosed please find two (2) Certificates of Insurance for Closure or Post-Closure Care, issued by Indian Harbor Insurance Company, for the Safety-Kleen facilities referenced above. The first certificate has been revised effective November 17, 2018, to reflect the correct 2018 closure cost estimate for Albuquerque. The estimate that was approved during the permit renewal process was in 2013 dollars and thus I increased for inflation each year based on the numbers in the attached spreadsheet.

The second certificate has been amended, effective January 25, 2018, to reflect the annual inflation increases of the financial assurance for both Albuquerque and Farmington. The increases were calculated by multiplying the existing 2018 financial assurance value by the annual inflation factor 1.0188. This inflation factor was calculated by dividing the annual Implicit Price Deflator (IPD) for Gross National Product (GNP) for 2017 (107.903) by the annual IPD for GNP for 2016 (105.903). These IPDs were obtained on December 21, 2018 from the U.S. Department of Commerce, Bureau of Economic Analysis, Table 1.1.9 Implicit Price Deflators for Gross Domestic Product.

| | |
|------------------------|---------------------------------------|
| Albuquerque (Closure): | $\$122,156 \times 1.0188 = \$124,453$ |
| Farmington (Closure): | $\$105,384 \times 1.0188 = \$107,365$ |

Please note that the original signed certificates were mistakenly submitted to Mr. Cornelius Amindyas NMEVN at the Albuquerque office. If you have any questions, please feel free to contact me at Harvey.Pamela@cleanharbors.com or 219-746-5050.

Sincerely,


Pamela K. Harvey, CHMM
Environmental Compliance Manager

Enclosures

Safety-Kleen Systems, Inc. a Clean Harbors Company
610 131st Place Hammond, IN 46327

CERTIFICATE OF INSURANCE FOR CLOSURE OR POST-CLOSURE CARE

Name and Address of Insurer (herein called the "Insurer"):

Indian Harbor Insurance Company
Seaview House, 70 Seaview Avenue
Stamford, CT 06902-6040

Name and Address of Insured (herein called the "Insured"):

Safety-Kleen Systems, Inc.
2600 North Central Expressway
Suite 400
Richardson, TX 75080

Facilities covered:

| | | | |
|-------------------------|--|--------------|-----------------------|
| Albuquerque 7-008-01 | 2720 Girard NE Albuquerque, NM 87107 | NMD000804294 | Closure: \$122,156 |
| Farmington 7-008-21 | 4210A Hawkins Road Farmington, NM 87401 | NMD980698849 | \$105,384 |
| TOTAL: | | | <u>\$227,540</u> |

Face Amount: \$227,540
Policy Number: PEC000659417
Effective Date: November 17, 2018

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d) and 265.145(d), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Secretary of the New Mexico Environmental Department, the Insurer agrees to furnish to the New Mexico Environmental Department a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e) as such regulations were constituted on the date shown immediately below.

Anthony Gentile
(Authorized signature for Insurer)

Anthony Gentile
(Name of person signing)

Executive Underwriter
(Title of person signing)

Lynda A. Sargeant
(Signature of witness or notary)

Jan. 22, 2019
(Date)

SEAL

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Lynda A. Sargeant, Notary Public
Uwchlan Twp., Chester County
My Commission Expires June 19, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Safety-Kleen Albuquerque New Mexico inflation increases 2013 - 2019

| inflation date | GNP IDP years | Closure | IF | Annual Inflation |
|----------------|--------------------|-----------|---------|------------------|
| March 2013 CCE | for permit renewal | \$113,933 | | |
| Jan-14 | 2012/2011 | \$113,933 | 1.018 | \$115,984 |
| Jan-15 | 2013/2012 | \$115,984 | 1.015 | \$117,724 |
| Jan-16 | 2014/2013 | \$117,724 | 1.014 | \$119,372 |
| Jan-17 | 2015/2014 | \$119,372 | 1.01049 | \$120,624 |
| Jan-18 | 2016/2015 | \$120,624 | 1.0127 | \$122,156 |
| Jan-19 | 2017/2016 | \$122,156 | 1.0188 | \$124,453 |

CERTIFICATE OF INSURANCE FOR CLOSURE OR POST-CLOSURE CARE

Name and Address of Insurer (herein called the "Insurer"):

Indian Harbor Insurance Company
Seaview House, 70 Seaview Avenue
Stamford, CT 06902-6040

Name and Address of Insured (herein called the "Insured"):

Safety-Kleen Systems, Inc.
2600 North Central Expressway
Suite 400
Richardson, TX 75080

Facilities covered:

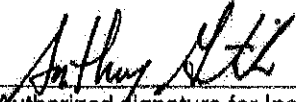
| | | | |
|-------------------------|--|--------------|-----------------------|
| Albuquerque 7-008-01 | 2720 Girard NE Albuquerque, NM 87107 | NMD000804294 | Closure: \$124,453 |
| Farmington 7-008-21 | 4210A Hawkins Road Farmington, NM 87401 | NMD980698849 | \$107,365 |
| TOTAL: | | | <hr/> \$231,818 |

Face Amount: \$231,818
Policy Number: PEC000659417
Effective Date: January 25, 2019

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d) and 265.145(d), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

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I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e) as such regulations were constituted on the date shown immediately below.



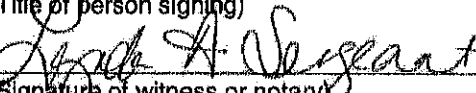
(Authorized signature for Insurer)

Anthony Gentile

(Name of person signing)

Executive Underwriter

(Title of person signing)



(Signature of witness or notary)

Jan. 22, 2019

(Date)

SEAL

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Lynda A. Sergeant, Notary Public
Liwchian Twp., Chester County
My Commission Expires June 19, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Table 1.1.9. Implicit Price Deflators for Gross Domestic Product

[Index numbers, 2012=100]

Last Revised on: December 21, 2018 - Next Release Date January 30, 2019

| Line | | 2016 | 2017 |
|------|---|----------------|----------------|
| 1 | Gross domestic product | 105.935 | 107.948 |
| 2 | Personal consumption expenditures | 104.235 | 106.073 |
| 3 | Goods | 94.340 | 94.632 |
| 4 | Durable goods | 91.183 | 89.136 |
| 5 | Nondurable goods | 95.867 | 97.437 |
| 6 | Services | 109.325 | 111.984 |
| 7 | Gross private domestic investment | 103.914 | 105.360 |
| 8 | Fixed investment | 104.357 | 105.939 |
| 9 | Nonresidential | 101.282 | 101.962 |
| 10 | Structures | 110.296 | 113.120 |
| 11 | Equipment | 97.738 | 97.183 |
| 12 | Intellectual property products | 100.208 | 101.294 |
| 13 | Residential | 118.185 | 123.495 |
| 14 | Change in private inventories | --- | --- |
| 15 | Net exports of goods and services | --- | --- |
| 16 | Exports | 93.248 | 95.923 |
| 17 | Goods | 87.822 | 90.490 |
| 18 | Services | 105.395 | 108.084 |
| 19 | Imports | 86.530 | 88.511 |
| 20 | Goods | 83.768 | 85.761 |
| 21 | Services | 100.918 | 102.835 |
| 22 | Government consumption expenditures and gross investment | 105.059 | 107.797 |
| 23 | Federal | 103.737 | 105.753 |
| 24 | National defense | 102.557 | 104.209 |
| 25 | Nondefense | 105.631 | 108.188 |
| 26 | State and local | 105.970 | 109.155 |
| | Addendum: | | |
| 27 | Gross national product | 105.903 | 107.903 |