

SAFETY-KLEEN SYSTEMS, INC.
ALBUQUERQUE SERVICE CENTER

PERMIT
ATTACHMENTS

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ATTACHMENT A FACILITY DESCRIPTION

A.1 INTRODUCTION

This Permit Attachment contains general information pertaining to Safety-Kleen Systems, Inc. Albuquerque Service Center (SKAL; the Facility) and its the management of hazardous waste Container and Tank storage areas covered by this Permit. The Facility is owned and operated by Safety-Kleen Systems, Inc.

Safety-Kleen Systems, Inc. stores hazardous waste and is a large quantity generator and transporter of hazardous waste, including used oil. The Facility is also a large quantity handler and transporter of universal waste, as well as a hazardous waste and a used oil transfer facility.

A.2 DESCRIPTION OF THE FACILITY

The Albuquerque hazardous waste Container and Tank storage facility is located at 2720 Girard Boulevard northeast in the City of Albuquerque, Bernalillo County, New Mexico (Figure 1, Permit Attachment L). The Facility lies on latitude 35° 06' 44" N, and longitude 106° 36' 46" W (Figure 1, Permit Attachment L, (Figures)).

The facility comprises the following 5 structures (Figure 2, Facility Diagram, Permit Attachment L, (Figures)).

1. One 2,500 square foot warehouse with offices, bathrooms, a sales representative room, and two container storage areas (east and west) for drum storage (;
2. Two 12,000-gallon underground storage tanks for clean and used solvent;
3. A solvent return and fill station with a loading dock;
4. One enclosed building used for flammable storage; and
5. One building with administrative offices and general warehousing.

Figure 3 presents a topographic map of the Facility. The Container and Tank Storage facility serves as an accumulation point for various hazardous wastes generated by Safety-Kleen customers. There is no onsite hazardous waste processing or disposal.

A.3 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Systems, Inc. is an U.S. service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. Currently, the Facility offers several services that involve the accumulation, transfer and storage of hazardous waste.

These wastes are transported from the permitted Facility to one of the Safety-Kleen recycle centers or to an independent permitted disposal facility. The following sections contain a description of each of these services:

A.3.1 Parts Cleaner Service

The original service offered by the Facility in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a reservoir and a degreasing area. The reservoir contains a degreaser such as petroleum naphtha solvent, immersion cleaner solvent, or aqueous cleaner. On a regularly scheduled basis, a representative of the Facility cleans and inspects the parts cleaner unit and replaces the reservoir of spent material, with clean product. The material is then transported back to the service center.

At the end of each day, solvent is transferred from drums to a storage tank at the facility and containers of product are prepared for the next day's services. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the used solvent from the Facility.

The hazardous waste is then poured into the dumpster/drum washer in the return and fill station. It is then pumped into the used parts washer solvent storage tank. The sediment, which accumulates at the bottom of the dumpster/drum washer, is removed manually, drummed and stored in the return and fill station according to the satellite accumulation requirements of 40 CFR §262.34(b). The drummed sediment is manifested and transported off-site prior to the expiration of the 90-day time frame for accumulation of hazardous waste.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model. The used solvent is pumped from the customer owned machine by a Safety-Kleen sales representative to a standard Safety-Kleen container which meets DOT requirements (typically a 16- or 30-gallon container). The used solvent is stored in the same manner as the used solvent collected from the leased parts cleaner machines. The sales representative then refills the customer- owned machine with Safety-Kleen parts washer solvent.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a DOT-approved container (typically a 16-gallon drum). The immersion cleaner is non-halogenated hydrocarbon mixture. The used solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse.

A.3.2 Dry Cleaner

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are drummed on the customer's premises and are periodically collected by a Facility representative. The drummed waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center.

A.3.3 Paint Waste Service

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses and industrial painting applications. Wastes containing thinners and paints are collected in containers that meet DOT specifications on the customer's premises. The Facility collects these containers and stores them in an enclosed masonry block, flammable storage building which is separate from the office/warehouses. These wastes are periodically shipped to a permitted facility for treatment and disposal.

A.3.4 Imaging/Photochemical Service

Imaging hazardous waste typically consists of three waste streams. Photo fixer solution is used to etch photo film during processing. This waste is characteristic for silver (D011). The Facility (or other contract permitted facility) is able to recover the hazardous constituent from the photo fixer solution. Used photo developer is an aqueous solution used to neutralize the etching effects of the photo fixer. This material exhibits no hazardous characteristics but may not be discharged into public wastewater treatment system in some communities. Silver collection canisters are sent to a recycle center for silver reclamation. These canisters do not meet the definition of a solid waste per 40 CFR 260.30(c) and are managed as a non-regulated material.

The Imaging/Photochemical hazardous wastes are placed in containers at the customer's place of business. The service representative collects these containers and stores them in the container storage area of the warehouse. The imaging/photochemical wastes are then re-manifested and periodically sent to a Safety-Kleen recycle center, contract permitted facility or other permitted treatment facility.

A.4 REGIONAL DESCRIPTION OF THE FACILITY

The Albuquerque, New Mexico Service Center is located in Bernalillo County about one mile northwest of Carlisle Blvd., and interstate highway 40. This area is zoned for manufacturing and, to the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may be in conflict with operations at this site.

A.4.1 Climate at the Facility

The climate in this part of the City of Albuquerque where the Facility is located is an arid, continental climate. Rainfall varies, but in the vicinity of the service center, average annual precipitation is 7 to 10 inches. The average annual snowfall is about 10 inches. The average temperature in winter is approximately 38 degrees F and 74 degrees F in summer. Winds blow from the north in winter and from the south in summer. The average annual wind speed is 9 miles per hour. A wind rose showing the prevailing wind-speed and direction is presented in Figure 4, Permit Attachment L (Figures).

Albuquerque is located in the Rio Grande Valley, and is bordered on both sides by mesas rising about 5,000 feet above mean sea level. The elevation at the service center is approximately 5,100 feet. The Facility is not located a 100-year flood plain (See Figures 3 and 5, Permit Attachment L).

The soil in the vicinity of the service center is the Wink Series. These deep, well drained soils are formed in unconsolidated alluvium but have been modified by aeolian erosion. The slopes are generally 0 to 1 percent in the area of the service center. The surface layer is a brown, fine sandy loam.

The Facility receives its water from the City of Albuquerque which also maintains a sanitary sewer line on Girard Boulevard. Drainage in this area is by way of a series of diversion channels. The North Diversion Channel is directly east of the service center. No schools, parks or hospitals exist within one quarter mile of the facility.

A.4.2 Seismic Standard

There are no seismic faults within 3,000 feet of the facility. According to the 2014 USGS (United States Geologic Society) the East Paradise is the nearest fault zone at 5.05 miles (26,664 feet) from the facility.

The Facility is not located in a 100-year flood plain area, nor is the area subject to flooding. Therefore, there are no barriers or provisions for drainage or flood control. A FEMA 100-Year Flood Plain Map is included as Figure 5 (Permit Attachment L, Figures).

A.4.3 Traffic Pattern, Volume, and Load bearing Capacity

The non-building areas of the facility are paved with asphalt, gravel, or concrete. The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station and this area is paved with asphalt and concrete.

Primary access to Facility is from Interstate 25 to Candelaria Road or Menaul Boulevard, or Interstate 40 to Carlisle Boulevard or 2nd Street, to Girard Boulevard NE. The distance from

either interstate to the facility is approximately 1 mile. All vehicle traffic to the Facility enters from Girard Boulevard NE. The access road is constructed of blacktop underlain by compacted gravel and was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The trucks that travel the routes between the Facility and its customers use the two-lane approach driveway.

The Albuquerque Container and Tank Storage Facility currently has 3 box trucks and 4 bulk tank trucks based there. The number of route vehicles may vary due to business needs. Vehicles typically make one round trip to / from the facility each operating day. Traffic generated by the Facility's operations does not have a major impact on the traffic volume of adjacent and nearby roadways, or on the routes the trucks travel.

The facility's hazardous waste collection vehicles that deliver wastes daily to the Facility are completely enclosed cargo-box straight trucks with a gross vehicle weight (GVW) of 33,000 pounds. The bulk trucks are used to collect used oils and non-hazardous industrial and commercial wastes. The bulk hazardous wastes are not managed on-site.

Waste containers are transported from the Facility in completely enclosed box trailers. The Facility is serviced by 18-wheel, 5-axle tractor-trailers with a maximum load of 80,000 pounds, with 13,000 pounds per axle attributed to the steering axle (axle 1); approximately 34,000 pounds maximum gross weight between axles 2 and 3; and 34,000 pounds maximum gross weight between axles 4 and 5. The tractor/trailer is generally dispatched to the Facility once a week.

Tractor/tankers are dispatched from a recycle center approximately every 40 working days to deliver the hazardous materials/clean solvent and pick up the used hazardous bulk solvent. These transfer activities are conducted at the underground storage tank area. These trucks have a maximum GVW of 80,000 pounds.

The size of the vehicles used to transport waste to and from the Facility may vary from what is described above; however, the cargo-carrying portion of the vehicle will always be a completely enclosed box-type cargo truck or bulk tanker. The frequency of the solvent delivery and pickup varies depending on business needs.

Due to the low-volume of vehicles entering and leaving the Facility, there are no onsite traffic control signs or signals; nor are stacking lanes or signage necessary on Girard Boulevard.

A.4.4 Surrounding Land Use

The Facility is located in an industrial zone and is surrounded by a commercial "Karate Studio" on the north, "All Around Signs" on the south, Girard Boulevard on the west, and America North Diversion Channel on the east.

A.5 STORAGE OF HAZARDOUS WASTE IN CONTAINERS

A.5.1 Drum Storage

The slab, curbing and collection trenches for the drum storage areas in the Container Storage Areas and flammable storage building are made of steel-reinforced concrete and the concrete has been poured so that no cracks or gaps exist between them. A concrete curb, approximately four inches high and six inches wide, encompasses the storage area except where there is a trench. Steel grates cover the trench to facilitate the movement of drums across it. The concrete floor and curbing is coated with a material intended to be impermeable to contain leaks and spills. The wastes placed in the drum storage areas are compatible with the containers in which they are stored. All containers are managed as if they contain free liquids.

The storage areas and containment systems are inspected each operating day. All accumulated liquids are identified and removed within 24 hours of detection to prevent overflow. All containers are marked with a proper DOT shipping description, generator information, and manifest numbers. If there has been a release that has accumulated, it will be easily identified by locating the leaking container. The leaking container would be placed in a DOT-approved salvage container. Due to the size of containers stored in the container storage areas, absorbents such as socks or pads are used to clean up the spill. This waste shall be placed into the salvage drum (along with the original shipping container) and shipped off-site for disposal.

The immersion cleaner, dry cleaning wastes, aqueous solvent, and paint wastes are stored in containers meeting DOT specifications. The drums are placed on pallets to facilitate shipping and storage.

Ignitable wastes in containers are stored at least fifty (50) feet from the property line in the masonry flammable building. The Flammable Storage Building wall construction is of concrete masonry. Secondary containment is provided by a coated, reinforced concrete floor that slopes toward a blind sump and collection trenches. Exterior walls are painted with light colors (white and beige) to reflect sunlight and the room is provided with an exhaust fan to prevent extremely high temperatures and the accumulation of fumes. An overhead door secures the building during non-operating hours.

A.5.2 Waste Management Practices

The Facility was designed to facilitate the handling and storage of hazardous wastes resulting from the services offered by Safety-Kleen. The underground storage tanks, the drum storage areas, and return and fill station all have secondary containments and the Facility is equipped to allow employees to safely manage hazardous wastes onsite.

A.5.3 Bulk Solvent Management

Used solvent from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. Hazardous waste in containers meeting DOT specifications is poured into the dumpsters in the return and fill station and the material in the dumpster is pumped into the used solvent storage tank. The return and fill station has secondary containment in the form of a 20.0 feet x 14.8 feet (1,548 gallons) concrete slab with curbing and a sump. The total volume of waste and product must not exceed 10 times the secondary containment volume.

The sediment which accumulates in the bottom of the dumpster/drum washer is removed manually (as necessary), drummed and temporarily stored in the return and fill station according to the satellite accumulation requirements of 40 CFR 262.34(b). Sediment is placed in the drum to no more than 2 inches from the top of the drum.

A.6 CONTAINER (DRUM MANAGEMENT)

The Albuquerque hazardous waste Container and Tank storage facility was designed to facilitate the management and storage of the hazardous wastes resulting from the services offered by Safety-Kleen. Proper handling of hazardous waste is ensured through proper training. Employees shall be trained on hazardous waste procedures during their initial training and then annually. Proper handling of hazardous waste shall be ensured through proper training and use of proper equipment. When practicable, containers will be moved with a forklift, pallet jack, or drum dolly.

Containers of waste are off-loaded from route trucks into the enclosed storage areas. Entrance to the East and West hazardous waste storage areas is at grade level. Waste containers that will be placed into storage in these areas are moved from the route truck via a hydraulic platform lift gate that is on each route truck. The employee moves containers from the cargo carrying portion of the vehicle onto the lift gate that is extended flush with bed of the truck. The lifted gate is then lowered to grade level. The drums are moved from the lift gate into the appropriate storage area by forklift, pallet jack, or drum dolly. The area where the route trucks park while unloading is paved.

Drums of waste that will be placed into storage in the Flammable Storage Building are delivered to an overhead door of the building, which has an elevated dock. Waste containers that will be placed into storage into this area are removed from the route truck via a hydraulic platform lift gate that is on each route truck. The employee shall move the hazardous waste containers from the cargo carrying portion of the vehicle directly to the concrete loading dock. The drums are subsequently moved from the vehicle into the appropriate storage area by forklift, pallet jack, or drum dolly. The area where the route trucks park while unloading is paved.

Drums of waste that will be emptied into the used solvent tank are delivered to an overhead door of the Return-and-Fill building. The building has an elevated dock (grating). Waste containers that will be emptied shall be moved from the route truck via a hydraulic platform lift gate that is on each route truck. The employee shall move containers from the cargo carrying portion of the vehicle onto the lift gate that is extended flush with bed of the truck. The lift gate is then lowered to the level of the dock. Alternatively, the drums may be moved to the dock using mechanical material handling equipment. Due to the size of containers stored in this area (typically 5, 15, and 30 gallon) and the area of the dock, the drums will be manually moved from the lift gate into the appropriate storage area. The area where the route trucks park while unloading is a concrete pad.

A.6.1 East Container Storage Unit

The East Container Storage Unit is used for storage of spent immersion cleaners, aqueous parts washer solvents, and dry-cleaning waste. A summary description of the Unit storage capacities can be found in Permit Attachment J, Table J.1-1.

The East Container Storage Area is equipped with secondary containment sized to contain 10% of the total volume of containers, as required by 40 CFR § 264.175 (b)(3). The secondary containment is in the form of a six-inch wide by 4-inch high steel-reinforced concrete curbs which have been poured so that no cracks or gaps exist, and two collection trenches with a combined collection trench capacity of 268 gallons. The maximum quantity of hazardous waste stored in the East Container Storage Unit shall not exceed 2,680 gallons.

A.6.2 West Container Storage Unit

The West Container Storage Unit is used for the storage of spent immersion cleaners, aqueous parts solvents, photo imaging wastes, and dry cleaning waste. The West Container Storage Unit is also equipped with secondary containment sized to contain 10% of the total volume of containers, as required by 40 CFR § 264.175 (b)(3).

The East and West drum storage areas in the warehouse are used to store containers of waste, which may include (1) used immersion cleaner, (2) dry cleaning wastes, (3) used aqueous solvent, and (4) used photochemical wastes. Additional materials, such as non-hazardous wastes, transfer wastes, or product may be stored as needed. The wastes are not mixed while on site and different wastes are segregated according to their contents. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes. All containers are stored on pallets. A summary description of the East and West Container Storage Units can be found in Permit Attachment J, Table J.1-1.

The drum storage areas have secondary containment in the form of a six-inch-wide by four-inch-high steel reinforced concrete curbs with an approximately 1.75 feet x 3 feet x 11 feet x 7.5 feet (431 gallon capacity) in the West warehouse and two collection trenches with approximately 2

feet x 3 feet x 3 feet x 7.5 feet (132 gallon capacity) and 2 feet x 1.5 feet x 6 feet x 7.5 feet (136 gallon capacity) for a combined collection trench capacity of 268 gallons in the East container storage warehouse. No more than 4,310 gallons of waste shall be stored in the West warehouse and no more than 2,680 gallons of waste shall be stored in the East warehouse at any time.

A.6.3 Flammable Storage Unit

The Flammable Storage Building is used for the storage of: 1) dumpster sediment; 2) paint waste, 3) used solvent; and (4) other flammable wastes or products, as necessary.

Secondary containment in the Flammable Storage Building is provided by epoxy coated floors that slope towards three collection trenches. The three collection trenches have dimensions of approximately 1.8 feet x 8.9 feet x 2.3 feet (276-gallon capacity), 1.9 feet x 9.8 feet x 2.1 feet (295-gallon capacity) and 1.9 feet x 11.9 feet x 2.3 feet (390 gallon capacity) for a combined collection capacity of 965 gallons. The maximum quantity of waste that is allowed to be stored at the Flammable Building is 9,650 gallons. A summary description of the Unit capacities can be found in Permit Attachment J, Table J.1-1.

Adequate aisle spacing (minimum of three feet) shall be maintained in the warehouse container storage areas and Flammable Storage Building. The three-foot aisle space is necessary for the unobstructed movement of personnel, medical and fire protection equipment, spill control equipment, and decontamination equipment, in case of emergency. Drums in the storage areas shall be placed on pallets and moved with a forklift or pallet jack when feasible. If containers 15 gallons or larger are stacked, a pallet shall separate the layers. The maximum number of containers stored per pallet layer is: 12-5 gallon containers; 9-15 gallon containers, 5-30 gallon containers, and 4-55 gallon containers. Containers of hazardous waste shall be stacked no more than two pallets high to ensure stability and safe material handling. The storage height of a typical double-stacked configuration is approximately seven feet. Containers shall be stored on pallets to prevent contact with any standing liquids.

A.6.4 Description of Containers

Safety-Kleen uses containers made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. Safety-Kleen will store and transport any incompatible wastes in accordance with 49 CFR 177.848 (segregation of hazardous materials).

Containers stored in at the Facility range from 5-gallon capacity to 55-gallon capacity. Safety-Kleen provides the generators of hazardous waste with the storage containers. Safety-Kleen customers may also package hazardous waste in containers not provided by the Facility. These containers shall be inspected prior to pickup to ensure proper DOT rating and shall not exceed 55-gallons in capacity. The contents of each waste container shall be verified by the waste marker (label) that is affixed to each container.

The Facility has a Special Permit issued by the U.S. Department of Transportation-Pipeline and Hazardous Materials Safety Administration that allows re-use of specific drums for transportation without being subjected to the leak-proof testing of 49 CFR 173.28(b)(2). Each drum shall be inspected for leakage before filling/refilling and shipment.

With the exception of used parts washer solvent drums, hazardous waste drums managed at the facility are not opened except for sampling purposes. Containers are handled to prevent rupture or leaking. Proper handling of hazardous waste shall be ensured through proper training of facility personnel. Employees shall be trained on hazardous waste management procedures during their initial training and then annually thereafter (refresher training). When feasible, containers shall be moved using mechanical means such as drum carts, dollies, or fork trucks. Facility employees shall inspect each hazardous waste drum prior to transporting it from the customers' location. In the event a container is found to be damaged, leaking, or not in good condition while in storage at the facility, it shall be placed into an appropriate salvage container. The salvage container shall be properly labeled and the entire packaging shall be transported offsite as per normal waste management protocols.

A.6.5 Management of Incompatible Wastes in Containers

The only waste containers routinely opened at the facility are the solvent waste containers, the contents of which are co-mingled in the underground storage tank. The remaining containers of wastes shall not be opened at the facility and shall not be placed in the same container, so that there is no potential of incompatible wastes being placed into the same container.

The only containers reused at the facility are drums containing used parts washer solvents. These drums are emptied and washed with same solvent in a drum washer and are then refilled with clean solvent for delivery to customers. As this is the only material placed in these drums is new or spent solvent, contact with incompatible materials is avoided.

A.7 PREVENTING RUNOFF FROM HAZARDOUS WASTE HANDLING AREAS

Containers of hazardous waste are off-loaded from route trucks into enclosed storage areas. The containers are stored in enclosed warehouses, and not subject to run on or run off. Drums of used mineral spirits solvent are emptied in the Return and Fill tank which is contained so that any material splashed, dripped, or spilled will not runoff. The non-building areas of the facility are paved with asphalt, concrete or gravel.

A.8 PREVENTION OF CONTAMINATION OF WATER SUPPLIES

The hazardous waste Container and Tank storage facility shall be operated in a manner that is protective of water supplies. Containers of waste are stored in enclosed storage areas and the transfer of parts washer solvent to the bulk storage tank is conducted over secondary

containment. Bulk underground storage tanks are constructed of ¼-inch thick carbon steel and are double walled with a leak detection system installed in the interstitial space.

A.9 MITIGATING EFFECTS OF EQUIPMENT FAILURE AND POWER OUTAGES

A power failure does not result in a spill. All activities requiring electricity shall cease should a power failure occur. The transfer pump used to pump the used solvent into the storage tank is electric and fails during a power outage. Since the tank is not pressurized, the lines will be in a stable state until the power is restored and the pump is restarted. The high level alarm on the tank requires electricity to operate. However, the only way used solvent can be transferred into the storage tank is via the transfer pump, and the pump shall not be operable during a power outage. The transfer pumps used to pump clean solvent into the storage tanks, or remove used solvent from the tank are located on the transport vehicles so a power failure does not have any effect on removal of waste from the tank.

A.10 PREVENTING UNDUE EXPOSURE OF FACILITY PERSONNEL

All Safety-Kleen employees receive extensive training on recognizing hazards in the workplace and how to avoid or best manage them. The Facility's Health and Safety department completes hazard assessments for all branch activities and issues a Personal Protection Equipment Matrix that all employees are required to follow. There is an emergency eyewash/shower located in the warehouse. There is a standard shower located in the office area that can be used to decontaminate in the event of accidental contact with contaminants and end-of-day decontamination.

A.11 PLANT OPERATIONS – POTENTIAL SPILL AND FIRE SOURCES AND CONTROL PROCEDURES

Employees must perform their duties in the safest manner possible and the Facility has been equipped to facilitate these activities. Drums of product or waste shall be moved using a handcart. Palletized containers are moved using a forklift or pallet jack. Upon arrival at the Facility, containers of used solvent must immediately be added to the storage tank or placed in the drum storage areas. Open drums of solvent must not be left unattended. Below are descriptions of situations which could result in accidents and the precautions taken to prevent their occurrence.

A.11.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean-up contractor) pollution incident:

- a. **Pouring of drummed solvent into the dumpster**--Employee training emphasizes the importance of taking care in emptying the drums. However, as the contents of the

drums are poured into the dumpster, solvent can splash out. The return and fill station is underlain by concrete containment with a sump. This design should contain this type of spill.

- b. **Filling of drums with solvent product**--A low pressure hose with an automatic shut-off valve, like those used at automotive service stations, shall be used to fill the drums with solvent. Leaking fittings, a damaged hose or carelessness could lead to the discharge of solvent outside of the drum. Manual emergency shut-off valves are located on each hose, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.
- c. **Moving of containers**--When a container is moved, a potential exists for it to tip over. To minimize the potential for spillage of solvent, all containers must be maintained in an upright position and remain tightly covered while in storage or in transit. The drum storage areas are designed so that if the contents of a container are spilled, the spilled material will be contained within the concrete trenches. If material is spilled, other containers are situated on pallets, therefore will not be in contact with the spilled material.
- d. **Delivery truck transfers**--The cargo shall be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary.

If a spill does occur, the amount of solvent in the containers is normally a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results from a spill will be removed manually, drummed, and shipped to a permitted facility for proper disposal.

A.11.2 Potential Major Spill Source

The following activities have the potential for a major (one for which remedial action will require assistance) release incident:

- a. **Overfilling of storage tanks**--Both product and used solvent tanks can be overfilled with a resulting discharge of solvent. A high-level alarm and daily checks of tank volumes are conducted to prevent this type of incident.
- b. **Leaking pipelines**--The pipelines to the storage tanks present a potential for leaks. Regular inspection of this equipment and the solvent inventory are conducted to detect any leaks.

A.11.3 Precautions Taken to Prevent Accidental Ignition or Reaction of Ignitable,

Reactive, or Incompatible Wastes

Reactive wastes are not received at this facility. It is Safety-Kleen's standard operating procedure to use containers made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. Safety-Kleen stores and transports any incompatible wastes in accordance with 49 CFR 177.848, Segregation of Hazardous Materials. Any wastes that may be incompatible with other wastes shall be managed as 10-day transfer wastes and these wastes shall remain in the containers in which they were originally packaged until received at the Facility or other properly permitted facility.

The following is a list of Safety-Kleen's fire prevention and minimization measures:

- a. All wastes and products shall be kept away from ignitable sources. Smoking shall be permitted only in designated areas, which are separate from any waste management areas. The solvent handling areas and the underground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.
- b. Ignitable wastes in containers are stored in the Flammable Materials Building, which is constructed with special fire explosion-proof wiring and is equipped with a fire suppression system.
- c. Ignitable wastes shall be managed in such a way that they do not:
 - Become subject to extreme heat or pressure, fire or explosion, or a violent reaction. The solvent hazardous waste shall be stored in a tank or in drums, none of which shall be near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks shall be vented and the drums kept at room temperature to minimize the potential for pressure build up.
 - Produce uncontrolled toxic mists, fumes, dusts, or gases in quantities sufficient to threaten human health.
 - Damage the structural integrity of the Facility.
- d. Adequate aisle space (minimum of three feet) shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.
- e. "No Smoking" signs are posted in areas where solvents are handled or stored.

- f. Fire extinguishers are checked once a week by facility personnel and tested by the fire extinguisher company once per year. Fire extinguishers are placed at several locations throughout the facility.
- g. There is a potential for static electricity occurring during transfer activities to and from the bulk solvent storage tanks and the transport tanker. This shall be controlled through bonding and grounding. In bonding, two containers or fluid streams are electrically connected. This neutralizes the build-up of a difference in static charge or potential between the two containers. In grounding, the containers are electrically connected to the Earth, which also drains off the buildup of static charge or potential.
- h. The facility manager is responsible for implementation of the written site-specific hot-work permit system program. This responsibility includes identifying areas in the plant which will require a hot work permit, indicating which areas are considered safe for hot work, and ensuring that plant equipment and areas have been properly classified and maintained in a safe working condition. Open flames shall not be permitted in any areas where ignitable or flammable materials are stored.

A.12 STORAGE OF HAZARDOUS WASTE IN TANKS

A.12.1 Tank Storage

The 12,000-gallon underground storage tank (UST) is 8 feet in diameter and 32.5 feet long. It is constructed of ¼-inch thick carbon steel and is double-walled with a leak detection system installed in the interstitial space. The exterior of the outside tank is coated with a plastic-fiberglass mixture so that no metal is exposed and the tank is isolated from electrical currents. The tank is constructed in accordance with Underwriter's Laboratories Standard 58 and is located more than 5 feet from the building foundation, in accordance with NFPA requirements. A liquid sensing leak detector is located between the two walls of the tank, and is checked each operating day.

A manually controlled waste-feed cut-off valve located adjacent to the wet dumpsters at the return and fill (R & F) station can prevent the used solvent tank from being overfilled. The tank is equipped with an aural (siren) and visual (strobe light) high-level alarm system which will alert employees when the tank is approximately 600 gallons from being full (95% capacity) and the pump automatically shuts off.

There is a 12,000-gallon UST for product solvent storage. Product solvent is transferred by tanker truck into the tank. When transferring the product, the pump on the tanker truck can be turned off immediately if the alarm on the Veeder-Root monitoring system goes off. There is also a high-level alarm that sounds if the tank gets to 95% capacity when filling the product solvent tank. A manual button can be used to test the alarm to insure the system is operable.

The fill pipes are secondarily contained to prevent spills during loading and unloading operations.

Cathodic protection has been installed for the carbon steel/FRP-coated composite tank. The return and fill station is a concrete block structure with a metal roof and the secondary containment is monolithically poured concrete. Elevated grating is situated above the containment area, which allows workers to easily remove or return containers to the route trucks, and transfer used solvents to the waste storage tank via the drum washer units. The two dumpster/drum washers are tight-piped to the tank, piping is below ground and the joints are welded to minimize the potential for leaks.

A.12.2 Description of Feed Systems

Used parts washer solvent is returned to the facility in containers that can range in size from 5 to 55 gallons. Once at the branch, the transport vehicle will back up to the R & F building unloading dock. Containers of spent parts washer solvent are manually unloaded onto the R & F to be emptied into the used solvent tank. The R & F building has containment consisting of monolithically-poured steel reinforced concrete with an approximately 4-inch curb. The concrete is coated with a material so as to be impermeable to contain leaks and spills. The truck staging area in front of the R & F is concrete and is designed to contain any leaks that may occur in this area. The containment will prevent migration of spills, leaks, or precipitation into or out from this area.

Emptying a container requires the operator to open the lid of the drum washer unit and individually pour each drum of used parts washer solvent into it. The drum washers consist of a vat with a capacity of approximately 162 gallons each. The drum washers are used to remove any solids that may have accumulated on the interior of the container. The drum washers use solvent previously removed from the container by recirculating the solvent through a low-pressure spray to clean the interior of drums. Revolving brushes clean the exterior of drums. During container processing, the solvent level in the drum washer is closely monitored and once solvent accumulates to a certain level, it is pumped automatically via float switch activation to the used solvent tank. The pump can also be manually operated.

After a container has been emptied and washed, it is allowed to drain on a rack inside the drum washer. After draining, it is staged to be refilled with clean parts washer solvent, or it will be placed into storage for future use.

Following the emptying of all containers of used parts washer solvent in a shipment, the operator will pump any solvent remaining in the drum washer unit to the lowest possible level (about 2 inches) and close the lid until the next shipment arrives. This practice is repeated until all daily shipments are received. At the end of the operating day, the drum washer is pumped to the lowest possible level and cleaned to be ready for the next day's use. All solids collected from the reservoir of the drum washer are containerized and managed as site-generated hazardous waste.

Used parts washer solvent stored in the RCRA permitted tank is regularly transported to a Safety-Kleen Recycle Center where it is recycled into clean product for redistribution.

If the level in the tank is 95% of capacity, the high-level float activates a switch that activates both a visual strobe light located at the tank, and audible (siren) alarm. The Return and Fill dock is located adjacent to the tank and alarms so the employee emptying drums is alerted to the detected 95% capacity. Movement of used solvent into the tank can be halted simply by discontinuing the drum emptying process. Simultaneously, the transfer pump is disabled so the tank will not overflow. The pump cannot be restarted until the level of solvent in the tank is below 95% capacity. The high-level alarm is tested daily for proper functioning of electrical and mechanical components.

Product solvent is pumped from the product storage tank into drums by a pump. The solvent is dispensed through a hose/nozzle configuration typical of what is utilized at fuel/gas stations. The nozzles are calibrated to click off when the solvent reaches a predetermined level in the drums. This is a manned operation, so there is little risk of overfilling the product drum if the nozzle fails to click off automatically.

Another pump located within the R & F structure (beneath the grating; above the secondary containment) transfers the used solvent placed into the drum washer/wet dumpster to the used solvent tank. This pump can also be used to pump any solvent that has accumulated in the blind sump to the tank.

The control panel for all pumps associated with the tank farm and R & F is located inside the east warehouse (CSU). The warehouse is accessible only by Facility personnel. The pumps are energized only when the power is turned on at the panel. The pumps are not activated unless parts washer solvent is being added to the used solvent tank or being pumped from the product solvent tank.

Product solvent is delivered by bulk tanker with typically a 7,000-gallon capacity. The vehicle parks on a concrete loading pad adjacent to the loading area. Prior to transferring product into the tank, the driver verifies there is adequate tank capacity for the entire load scheduled for delivery. The driver places a bucket to capture any drips that may occur when connecting and disconnecting the delivery hoses on the tanker. Any drips that may occur when connecting and disconnecting the delivery hoses to the tank piping are captured in a containment box surrounding the inlets and outlets. The product tank is equipped with a high-level alarm system and Veeder-Root detection system; same as the used solvent tank. If the alarm sounds, the driver can immediately shut down transfer operations.

After the driver delivers the load of clean product, he/she determines available capacity in the tanker. The transfer hose is connected to the exit line on the used solvent tank and the used solvent is transferred into the tanker. The transfer operations are monitored at all times by the

driver. To eliminate the risk of a static charge during transfer operations, the tanker is grounded and bonded.

A.12.3 Secondary Containment of Storage Tank

The double-wall steel-FRP composite used solvent storage tank installed at this site was fabricated to satisfy the requirements of UL-58 and UL-142 and that it also satisfies the requirements of ACT-100®, NFPA 30 and 31, the Uniform Fire Code, and EPA 280.20. Further, cathodic protection was installed on the tank during its installation. Therefore, the tank satisfies the requirements of 40 CFR § 264.193(e)(3)(i) and (ii) in providing an integral double-wall structure which is protected against both internal and external corrosion.

A summary description of the Unit can be found in Permit Attachment J, Table J.1-1.

A.12.4 Secondary Containment of Underground Piping

The underground used solvent piping is provided with secondary containment in the form of a high-density polyethylene pipe jacket. The piping slopes downward to the sump riser for the tank fill nozzle, where an automatic leak detection sensor is installed to immediately detect pipe leakage collected by the pipe jacket.

A.12.5 Ignitable, Reactive, and Incompatible Wastes

The facility does not receive nor treat any reactive or incompatible waste in the tank system. Ignitable waste is not treated, rendered, or mixed before or immediately after placement into the tank system so that the resulting waste, mixture, or dissolved material no longer meets the definition of ignitable.

The ignitable waste is stored and managed such that it is protected from any material or conditions that may cause the waste to ignite. No smoking or hot work (i.e. welding) is allowed in the vicinity of the tank.

The only hazardous waste stored in the storage tank is used parts washer solvent. This material has been analyzed and found to be compatible with the steel tank in which it is stored. The tank used for storage of the spent parts washer solvent was new when installed, and is dedicated to the storage of this waste stream. Incompatible raw materials or wastes shall not be stored in this tank.

A.12.6 Description of procedures, structures, or equipment used to prevent releases

to the atmosphere.

The tank system is equipped with a high-level alarm that is activated by a float, which indicates when the tank is 95% full. If the level in the tank is 95% of capacity, the float activates a switch which activates both visual and audible alarms. Consequently, the transfer pump is also disabled so that the tank will not overflow. The high-level alarm is inspected each operating day for proper functioning of electrical and mechanical components. The volume of used solvent in the tank is monitored each operating day to ensure adequate capacity for the day's activities. .

The tank is equipped with a 2-inch atmospheric vent. The specific gravity of the hydrocarbon-based parts washer solvents is approximately 0.8 and the vapor pressure is less than 2 mm at 68 degrees F.

With the exception of the parts washer solvent drums that are emptied into bulk storage, containers of waste are not opened while onsite, unless required for sampling. The containers are inspected each operating day (when the facility is in operation) for signs of deterioration.

The wet dumpster/drum washer units and aboveground piping are inspected each operating day for signs of deterioration.

A.12.7 Tank Evaluation and Repair Plan

The product and waste solvent stored in the tanks at this facility are compatible with the carbon steel structure. If, during the inspections, corrosion is noted, or the leak detection system indicates a leak, the tank shall be immediately taken out of service and repaired and/or replaced. In the case of a tank which leaks outside of the secondary containment, the facility's Contingency Plan will be initiated to insure the removal of any contaminated soil. Any extensive repairs to, or replacement of, the tank system shall be assessed and certified by an independent engineer registered in the State of New Mexico before the system is returned to use.

A.13 SECURITY MEASURES

A.13.1 Artificial Barrier/Means to Control Entry

The facility is secured with a chain link fence with three strands of barbed wire inside a coil of barbed wire surrounding the hazardous waste management areas. All access gates are locked when the facility is unoccupied. Outdoor lights illuminate the area in low light.

The fence and gates are inspected at least weekly. Any needed repairs shall be initiated immediately upon detection.

A.13.2 24-Hour Surveillance System

The facility does not have a 24-hour surveillance system. Security is achieved by the fence and gate system. Locks are on all entrances to the warehouses and Flammable Storage Building. Remote controls for all tank operations are inside the warehouse.

A.13.3 Warning Signs

Warning signs stating “Danger-Unauthorized Personnel Keep Out” (or equivalent language) in both English and Spanish, which are legible from a distance of twenty-five feet from the fence is posted at all the entrances to the facility.

A.13.4 Building Access

The office/warehouse buildings are secured with locks on all doors and warning signs are posted at entrances to work and waste storage areas. The waste management storage units are accessible only to Safety-Kleen employees. Hazardous waste can only be added to the waste tank or removed from the storage tank by activating the pumps, and the control is located remotely inside the warehouse. The pumps are activated only when facility personnel are operating on the Return & Fill dock.

A.13.5 Internal and External Communications and Alarm Systems

Because the Facility is small, internal communication within the building and the solvent return/fill area is accomplished by voice. An alarm, located at the return and fill station alerts other employees in the warehouse that there may be a problem. Telephones shall be used to report a spill or fire and to summon assistance from local and state emergency response agencies (if necessary). Emergency phone numbers of local and state emergency response teams are posted by each phone. Included in these phone numbers is the 24-hour telephone number which can be used to contact Safety-Kleen's environmental response coordinators. Evacuation procedures are described in Permit Attachment D, Section D.5 (Facility Evacuation Plan).

A.13.6 Required Equipment: The emergency equipment requirement is met with the following:

- a. Internal communications will be by voice or telephone/paging system. Telephones are available in the warehouse and office areas that can be used to summon assistance if there is an emergency. These phones are accessible to all employees when waste is being handled.
- b. Fire extinguishers are available next to exits in the warehouse and the Flammable Storage Building.
- c. Water is supplied by the City of Albuquerque.

A.14 SUBPART CC COMPLIANCE PLAN

The 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, and the requirements of Permit Part 3, Section 3.8 (Air Emissions).

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.

A.14.1 Waste Determination Procedures

For purposes of waste determination, this facility utilizes knowledge developed in the Waste Characterization (Waste Analysis Plan) portion of the Operation Plan/Permit. For 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 ppm_w 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.

A.14.2 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 Facility.

A.14.3 Tanks

Hazardous waste is managed in a 12,000-gallon underground storage tank (UST). The UST is designed in accordance with UL Standard 58, constructed of carbon steel and is installed in accordance with NFPA standards. Certain features of these units, as they relate to the Subpart CC standards, are described below.

Used mineral spirits UST is a fixed roof, non-pressurized, quiescent tank. The used solvent tank at the facility is a Level 1 tank under Subpart CC. The tank design capacity is less than 75 cubic meters or about 19,813 gallons, and the waste in the tank 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. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 264.1083(c)(2). Documentation for the basis of this determination is found in the Safety-Kleen Solvents Vapor Pressure Summary table included at the end of this Subpart CC Plan.

The hazardous waste storage 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.

The 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 unit at this facility is ancillary equipment to the tank. This unit is kept closed except when adding or removing wastes, sampling, or performing routine maintenance that requires the lid to be open.

A.14.4 Containers

Containers managing hazardous wastes generally fall into three categories.

1. Those hazardous waste containers less than 26 gallons in capacity are 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 hazardous wastes 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 gallons and 122 gallons are all Level 1 containers and generally meet the Level 1 standards as covered containers designed with no gaps, holes, cracks, or other open spaces into the container. In addition, all Safety-Kleen containers used to manage hazardous waste meet applicable U.S. DOT regulations on packaging hazardous materials for transportation.
3. Containers of greater than 122 gallons that manage hazardous wastes at this facility are not in light 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 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.

A hazardous waste is a “light material” if it (1) contains at least one organic constituent with a vapor pressure above 0.3 (kPa) at 20°C, and (2) has a total concentration of such constituents of 20% or greater by weight. This definition will generally apply to all hazardous waste received at the facility in non-bulk containers.

A.14.4.1 Level 1 Containers

Provided below is a summary of the criteria applicable for a container to be identified and managed as a Level 1 container.

| LEVEL | VOLUME | USAGE | REQUIREMENTS |
|---------|--|--|---|
| Level 1 | > 26 gallons but ≤ 119 gallons OR >119 gallons | Any hazardous waste Not “in light material service” | <ul style="list-style-type: none"> - Meet DOT specs or is a lab pack - Keep closed except when adding or removing waste - Safety relief devices - Minimize exposure of waste when transferring, - Remediate defective containers within 5 days, initiate within 24 hours |

Level 1 containers typically received and managed by this facility include, but are not limited to, 5 gallons, 15 gallons, 30 gallons, 55 gallons, or 275-gallon containers. These containers meet applicable DOT specifications and/or authorizations. Therefore, these containers are acceptable for use in accordance with Level 1 controls. Containers greater than 26 gallons managing site generated hazardous waste will be visually inspected upon their initial filling and within one year, if the container is not completely emptied of its contents.

A.14.4.2 Inspection 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 presented in Permit Attachment E (Inspection Plan).

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. Henceforth visual tank inspections shall be conducted on an annual basis.

A.14.4.3 Recordkeeping

Documentation of waste determination: For purposes of waste determination, this facility utilizes knowledge of the wastes described in Permit Attachment C (Waste Analysis Plan). For those hazardous wastes which are managed on a transfer basis, the Subpart CC regulations do not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, publications, 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 ppm_w at the point of waste origination. Therefore, hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

Table A.2. Safety-Kleen Solvents Vapor Pressure Summary (Isoteniscope Method)

| Product Name | Product Number | 680 F (200 C) | | | | 1000F (380 C) | | | |
|----------------------------|----------------|---------------|-----------|-----------|------------|---------------|-------|-------|-------|
| | | mm-Hg | psia | K Pa | atm | mm-Hg | psia | K Pa | atm |
| S-K 150 (Premium) | 6605 | 0.7 | 0.012 | 0.080 | 0.001 | 1.7 | 0.033 | 0.227 | 0.002 |
| Immersion Cleaner | 699 | <0.41 | <0.0079 | <0.055 | – | – | – | – | – |
| Heavy Duty Lacquer Thinner | 6782 | 75-94.7 | 1.45-1.83 | 10-12.6 | 0.10-0.134 | – | – | – | – |
| Low V.P. Lacquer Thinner | 6664 | 24-35 | 0.46-0.68 | 3.20-4.67 | 0.03-0.05 | – | – | – | – |

PERMIT ATTACHMENT B AUTHORIZED WASTES

B.1 INTRODUCTION

This Permit Attachment authorizes the types and quantities of wastes that the Permittee is allowed to accept, manage, and store at the Facility.


B.2 AUTHORIZED WASTES FOR STORAGE IN CONTAINERS AND TANKS AT THE FACILITY

Table B-1 below lists the wastes that the permittee is authorized to manage and store in containers and tanks at the facility. Additional requirements are presented in Permit Part 3 (Storage of Hazardous Waste in Containers) and Permit Part 4 (Storage of Hazardous Waste in Tanks).

TABLE B.1 AUTHORIZED WASTES

The Part A Permit Application below contains the list and descriptions of the types of hazardous waste the Permittee may manage and store at the Container and Tank storage facility located in the City of Albuquerque.

OMB# 2050-0024; Expires 01/31/2017

| | | | |
|---|--|--|---|
| <p>SEND COMPLETED FORM TO: The Appropriate State or Regional Office.</p> | <p>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p> | |  |
| <p>1. Reason for Submittal</p> <p>MARK ALL BOX(ES) THAT APPLY</p> | <p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input type="checkbox"/> Site was a TSD facility and/or generator of > 1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)</p> | | |
| <p>2. Site EPA ID Number</p> | <p>EPA ID Number <input type="text" value="NM"/> <input type="text" value="D"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="9"/> <input type="text" value="8"/> <input type="text" value="0"/> <input type="text" value="4"/> <input type="text" value="2"/> <input type="text" value="9"/> <input type="text" value="4"/></p> | | |
| <p>3. Site Name</p> | <p>Name: SAFETY-KLEEN SYSTEMS, INC.</p> | | |
| <p>4. Site Location Information</p> | <p>Street Address: 2720 GIRARD AVENUE NE</p> <p>City, Town, or Village: ALBUQUERQUE County: BERNALILLO</p> <p>State: NM Country: USA Zip Code: 87107</p> | | |
| <p>5. Site Land Type</p> | <p><input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> | | |
| <p>6. NAICS Code(s) for the Site (at least 5-digit codes)</p> | <p>A. <input type="text" value="5"/> <input type="text" value="6"/> <input type="text" value="2"/> <input type="text" value="1"/> <input type="text" value="1"/> <input type="text" value="2"/></p> <p>B. <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/></p> <p>C. <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/></p> <p>D. <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/></p> | | |
| <p>7. Site Mailing Address</p> | <p>Street or P.O. Box: 2720 GIRARD AVENUE NE</p> <p>City, Town, or Village: ALBUQUERQUE</p> <p>State: NM Country: USA Zip Code: 87107</p> | | |
| <p>8. Site Contact Person</p> | <p>First Name: ANTONIO MI: Last: JARAMILLO</p> <p>Title: AREA GENERAL MANAGER</p> <p>Street or P.O. Box: 2720 GIRARD AVENUE NE</p> <p>City, Town or Village: ALBUQUERQUE</p> <p>State: NM Country: USA Zip Code: 87107</p> <p>Email: Tony.Jaramillo@safety-kleen.com</p> <p>Phone: 505-884-2277 Ext.: Fax:</p> | | |
| <p>9. Legal Owner and Operator of the Site</p> | <p>A. Name of Site's Legal Owner: SAFETY-KLEEN SYSTEMS, INC Date Became Owner: 3/01/1977</p> <p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>Street or P.O. Box: 2700 N. CENTRAL EXPRESSWAY</p> <p>City, Town, or Village: RICHARDSON Phone: 972-265-2000</p> <p>State: TX Country: USA Zip Code: 75080</p> <p>B. Name of Site's Operator: SAFETY-KLEEN SYSTEMS, INC Date Became Operator: 3/01/1977</p> <p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> | | |

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| 10. Type of Regulated Waste Activity (at your site) Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed. | |
| A. Hazardous Waste Activities; Complete all parts 1-10. | |
| Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 1. Generator of Hazardous Waste If "Yes," mark only one of the following – a, b, or c. <ul style="list-style-type: none"> <input checked="" type="checkbox"/> a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material. <input type="checkbox"/> b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste. <input type="checkbox"/> c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste. If "Yes" above, indicate other generator activities in 2-10. | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 5. Transporter of Hazardous Waste If "Yes," mark all that apply. <ul style="list-style-type: none"> <input checked="" type="checkbox"/> a. Transporter <input checked="" type="checkbox"/> b. Transfer Facility (at your site) |
| Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 2. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section. | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 6. Treater, Storer, or Disposer of Hazardous Waste Note: A hazardous waste Part B permit is required for these activities. |
| Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 3. United States Importer of Hazardous Waste | Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 7. Recycler of Hazardous Waste |
| Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 4. Mixed Waste (hazardous and radioactive) Generator | Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 8. Exempt Boiler and/or Industrial Furnace If "Yes," mark all that apply. <ul style="list-style-type: none"> <input type="checkbox"/> a. Small Quantity On-site Burner Exemption <input type="checkbox"/> b. Smelting, Melting, and Refining Furnace Exemption |
| | Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 9. Underground Injection Control |
| | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 10. Receives Hazardous Waste from Off-site |
| B. Universal Waste Activities; Complete all parts 1-2. | |
| Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply. | |
| <ul style="list-style-type: none"> a. Batteries <input type="checkbox"/> b. Pesticides <input type="checkbox"/> c. Mercury containing equipment <input type="checkbox"/> d. Lamps <input type="checkbox"/> e. Other (specify) _____ <input type="checkbox"/> f. Other (specify) _____ <input type="checkbox"/> g. Other (specify) _____ <input type="checkbox"/> | |
| Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity. | |
| C. Used Oil Activities; Complete all parts 1-4. | |
| Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 1. Used Oil Transporter If "Yes," mark all that apply. <ul style="list-style-type: none"> <input checked="" type="checkbox"/> a. Transporter <input type="checkbox"/> b. Transfer Facility (at your site) | |
| Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 2. Used Oil Processor and/or Re-refiner If "Yes," mark all that apply. <ul style="list-style-type: none"> <input type="checkbox"/> a. Processor <input type="checkbox"/> b. Re-refiner | |
| Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 3. Off-Specification Used Oil Burner | |
| Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 4. Used Oil Fuel Marketer If "Yes," mark all that apply. <ul style="list-style-type: none"> <input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner <input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications | |

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D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y N 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

a. College or University

b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university

c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y N 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.


| | | | | | | |
|------|------|------|------|------|------|------|
| D001 | D004 | D005 | D006 | D007 | D008 | D009 |
| D010 | D011 | D018 | D019 | D021 | D022 | D023 |
| D024 | D025 | D026 | D027 | D028 | D029 | D030 |
| D032 | D033 | D034 | D035 | D036 | D037 | D038 |
| D039 | D040 | D041 | D042 | D043 | F002 | F003 |
| F004 | F005 | | | | | |
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B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

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| 12. Notification of Hazardous Secondary Material (HSM) Activity | | |
| <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?</p> <p style="margin-left: 40px;">If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.</p> | | |
| 13. Comments | | |
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| 14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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 fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11). | | |
| Signature of legal owner, operator, or an authorized representative | Name and Official Title (type or print) | Date Signed (mm/dd/yyyy) |
|  | Mori Sorenson-Director EHS | 06/26/2015 |
| | | |
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| United States Environmental Protection Agency HAZARDOUS WASTE PERMIT INFORMATION FORM | | | |
|---|---|-------|---------------------------------------|
| 1. Facility Permit Contact | First Name: ANTONIO | MI: | Last Name: JARAMILLO |
| | Contact Title: BRANCH GENERAL MANAGER | | |
| | Phone: 505-884-2277 | Ext.: | Email: Tony.Jaramillo@safety-kleen.co |
| 2. Facility Permit Contact Mailing Address | Street or P.O. Box: 2720 GIRARD AVENUE NE | | |
| | City, Town, or Village: ALBUQUERQUE | | |
| | State: NM | | |
| | Country: USA | | Zip Code: 87107 |
| 3. Operator Mailing Address and Telephone Number | Street or P.O. Box: 2720 GIRARD AVENUE NE | | |
| | City, Town, or Village: ALBUQUERQUE | | |
| | State: NM | | Phone: 505-884-2277 |
| | Country: USA | | Zip Code: 87107 |
| 4. Facility Existence Date | Facility Existence Date (mm/dd/yyyy): 3/01/1977 | | |
| 5. Other Environmental Permits | | | |
| A. Facility Type <i>(Enter code)</i> | B. Permit Number | | C. Description |
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| 6. Nature of Business: | | | |
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7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

- AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
- UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

| Process Code | Process | Appropriate Unit of Measure for Process Design Capacity | Process Code | Process | Appropriate Unit of Measure for Process Design Capacity |
|------------------------|-------------------------------------|--|---|--|---|
| Disposal | | | Treatment (Continued) (for T81 – T94) | | |
| D79 | Underground Injection Well Disposal | Gallons; Liters; Gallons Per Day; or Liters Per Day | T81 | Cement Kiln | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour |
| D80 | Landfill | Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards | T82 | Lime Kiln | |
| D81 | Land Treatment | Acres or Hectares | T83 | Aggregate Kiln | |
| D82 | Ocean Disposal | Gallons Per Day or Liters Per Day | T84 | Phosphate Kiln | |
| D83 | Surface Impoundment Disposal | Gallons; Liters; Cubic Meters; or Cubic Yards | T85 | Coke Oven | |
| D99 | Other Disposal | Any Unit of Measure Listed Below | T86 | Blast Furnace | |
| Storage | | | T87 | Smelting, Melting, or Refining Furnace | |
| S01 | Container | Gallons; Liters; Cubic Meters; or Cubic Yards | T88 | Titanium Dioxide Chloride Oxidation Reactor | |
| S02 | Tank Storage | Gallons; Liters; Cubic Meters; or Cubic Yards | T89 | Methane Reforming Furnace | |
| S03 | Waste Pile | Cubic Yards or Cubic Meters | T90 | Pulping Liquor Recovery Furnace | |
| S04 | Surface Impoundment | Gallons; Liters; Cubic Meters; or Cubic Yards | T91 | Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid | |
| S05 | Drip Pad | Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards | T92 | Halogen Acid Furnaces | |
| S06 | Containment Building Storage | Cubic Yards or Cubic Meters | T93 | Other Industrial Furnaces Listed in 40 CFR 260.10 | |
| S99 | Other Storage | Any Unit of Measure Listed Below | T94 | Containment Building Treatment | Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour |
| Treatment | | | Miscellaneous (Subpart X) | | |
| T01 | Tank Treatment | Gallons Per Day; Liters Per Day | X01 | Open Burning/Open Detonation | Any Unit of Measure Listed Below |
| T02 | Surface Impoundment | Gallons Per Day; Liters Per Day | X02 | Mechanical Processing | Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; or Gallons Per Day |
| T03 | Incinerator | Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour | X03 | Thermal Unit | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour |
| T04 | Other Treatment | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour | X04 | Geologic Repository | Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters |
| T80 | Boiler | Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour | X99 | Other Subpart X | Any Unit of Measure Listed Below |
| Unit of Measure | Unit of Measure Code | Unit of Measure | Unit of Measure Code | Unit of Measure | Unit of Measure Code |
| Gallons | G | Short Tons Per Hour | D | Cubic Yards | Y |
| Gallons Per Hour | E | Short Tons Per Day | N | Cubic Meters | C |
| Gallons Per Day | U | Metric Tons Per Hour | W | Acres | B |
| Liters | L | Metric Tons Per Day | S | Acre-feet | A |
| Liters Per Hour | H | Pounds Per Hour | J | Hectares | Q |
| Liters Per Day | V | Kilograms Per Hour | X | Hectare-meter | F |
| | | Million BTU Per Hour | X | BTU Per Hour | I |

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7. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

| Line Number | A. Process Code (From list above) | | | B. PROCESS DESIGN CAPACITY | | C. Process Total Number of Units | For Official Use Only | | | |
|-------------|--------------------------------------|---------------------|---|----------------------------|---|----------------------------------|-----------------------|--|--|--|
| | (1) Amount (Specify) | (2) Unit of Measure | | | | | | | | |
| X 1 | S | 0 | 2 | 533.788 | G | 001 | | | | |
| 1 | S | 0 | 1 | 16,640 | G | 003 | | | | |
| 2 | S | 0 | 2 | 12,000 | G | 001 | | | | |
| 3 | | | | | | | | | | |
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Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)

| Line Number (Enter #s in sequence with Item 7) | A. Process Code (From list above) | | | B. PROCESS DESIGN CAPACITY | | C. Process Total Number of Units | For Official Use Only | | | |
|---|--------------------------------------|---------------------|---|----------------------------|---|----------------------------------|-----------------------|--|--|--|
| | (1) Amount (Specify) | (2) Unit of Measure | | | | | | | | |
| X 2 | T | 0 | 4 | 100.00 | U | 001 | | | | |
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9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

- A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. **ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. **UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | CODE | METRIC UNIT OF MEASURE | CODE |
|-------------------------|------|------------------------|------|
| POUNDS | P | KILOGRAMS | K |
| TONS | T | METRIC TONS | M |

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
 2. Enter "000" in the extreme right box of Item 9.D(1).
 3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.
- 2. PROCESS DESCRIPTION:** If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| Line Number | A. EPA Hazardous Waste No. (Enter code) | | | | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | D. PROCESSES | | | | | | | | | | | | | | | | |
|-------------|---|---|---|---|----------------------------------|---------------------------------|--------------|---|---|---|--|---|---|--|--|--|--|--|--|--|--|--|---------------------|
| | (1) PROCESS CODES (Enter Code) | | | | | | | | | | (2) PROCESS DESCRIPTION (If code is not entered in 9.D(1)) | | | | | | | | | | | | |
| X | 1 | K | 0 | 5 | 4 | 900 | P | T | 0 | 3 | D | 8 | 0 | | | | | | | | | | |
| X | 2 | D | 0 | 0 | 2 | 400 | P | T | 0 | 3 | D | 8 | 0 | | | | | | | | | | |
| X | 3 | D | 0 | 0 | 1 | 100 | P | T | 0 | 3 | D | 8 | 0 | | | | | | | | | | |
| X | 4 | D | 0 | 0 | 2 | | | | | | | | | | | | | | | | | | Included With Above |

EPA ID Number | N | M | D | 0 | 0 | 0 | 8 | 0 | 4 | 2 | 9 | 4 |

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| 9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.) | | | | | | | | | | | | | |
|--|---|---|---|---|----------------------------------|---------------------------------|--------------|---|---|---|---|---|--|
| Line Number | A. EPA Hazardous Waste No. (Enter code) | | | | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | D. PROCESSES | | | | | | (2) PROCESS DESCRIPTION (If code is not entered in 9.D(1)) |
| | (1) PROCESS CODES (Enter Code) | | | | | | | | | | | | |
| 1 | D | 0 | 0 | 1 | 20 | T | S | 0 | 1 | S | 0 | 2 | Included in 9.1, 9.35, 9.36 |
| 2 | D | 0 | 0 | 2 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 3 | D | 0 | 0 | 4 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 4 | D | 0 | 0 | 5 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 5 | D | 0 | 0 | 6 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 6 | D | 0 | 0 | 7 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 7 | D | 0 | 0 | 8 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 8 | D | 0 | 0 | 9 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 9 | D | 0 | 1 | 0 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 10 | D | 0 | 1 | 1 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 11 | D | 0 | 1 | 8 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 12 | D | 0 | 1 | 9 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 13 | D | 0 | 2 | 1 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 14 | D | 0 | 2 | 2 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 15 | D | 0 | 2 | 3 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 16 | D | 0 | 2 | 4 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 17 | D | 0 | 2 | 5 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 18 | D | 0 | 2 | 6 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 19 | D | 0 | 2 | 7 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 20 | D | 0 | 2 | 8 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 21 | D | 0 | 2 | 9 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 22 | D | 0 | 3 | 0 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 23 | D | 0 | 3 | 2 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 24 | D | 0 | 3 | 3 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 25 | D | 0 | 3 | 4 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 26 | D | 0 | 3 | 5 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 27 | D | 0 | 3 | 6 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 28 | D | 0 | 3 | 7 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 29 | D | 0 | 3 | 8 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 30 | D | 0 | 3 | 9 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 31 | D | 0 | 4 | 0 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 32 | D | 0 | 4 | 1 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 33 | D | 0 | 4 | 2 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 34 | D | 0 | 4 | 3 | | | | | | | | | Included in 9.1, 9.35, 9.36 |
| 35 | F | 0 | 0 | 2 | 2 | T | S | 0 | 1 | | | | |
| 36 | F | 0 | 0 | 3 | 4 | T | S | 0 | 1 | | | | |

PERMIT ATTACHMENT C WASTE ANALYSIS PLAN

C.1 INTRODUCTION

This waste analysis plan (WAP) contains requirements and procedures for the characterization of the chemical and physical nature of hazardous wastes generated, stored or otherwise managed at the Facility.

The following sections contain general descriptions of the waste types summarized in Table C-1, the major waste generating processes and/or activities, and the general waste forms associated with each type. For the purposes of this WAP, a waste type is a general category used to describe one or more wastes that share key features (e.g., type of waste generating processes, waste form, and the basis for general characterization).

**TABLE C-1
Summary of Waste Types managed at the Albuquerque Storage Facility**

| Waste Description | EPA Waste Code | Facility Capacity ¹ (gallons) | Estimated Annual Amount ² |
|-----------------------------------|-------------------------------|---|--------------------------------------|
| Used Solvents (Petroleum Naphtha) | D001 ³ | 12,000 | 5,000 |
| Tank/Dumpster Bottom Sediment | D001 ³ | N/A | 3 |
| Used Immersion Cleaner | D006 ³ | 6,990 | 250 |
| Dry Cleaning Waste | F002 ³ | Included with Used Immersion Cleaner | 650 |
| Used Solvent (aqueous) | See Below ³ | Included with Used Immersion Cleaner | 3 |
| Paint Waste | D001, F003, F005 ³ | 9,650 | 900 |
| Photo Chemical Wastes | D011 | Included with Used Immersion Cleaner | 3 |

¹ The facility capacity is in gallons.

² The annual amount is in gallons.

³ and may include D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043.

C.2 DESCRIPTION OF WASTES

The solvents managed at the facility are incompatible with strong oxidizers and reactive metals, none of which are present in the containers, tanks, container storage areas, or the concrete sealant. The solvents must be compatible with one another.

C.2.1 Wastes Resulting from the Parts Washer Service

Used solvents from parts washers are accumulated in a 12,000 gallon underground, double-walled storage tank via the return and fill station. Containers of used material are poured into a dumpster at the return and fill station which in turn empties into the tank. This waste handling method results in the following five types of solvent waste (1-5), in addition to the waste codes F002, F003, F004 and/or F005:

1. **Used solvent** - The used solvent is removed from the tank by a tanker truck on a scheduled basis. About 5,000 gallons are removed every month. This waste is ignitable (D001) and may exhibit the toxicity characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.
2. **Bottom Sediment in the Tank** - Periodically, it is necessary to remove sediment and other heavy hazardous waste from the bottom of the tank. A Safety-Kleen vacuum truck is generally used for this purpose. The sediment is ignitable (D001) and may exhibit the toxicity characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.
3. **Dumpster Sediment** - Sediment may also accumulate in the drum washers in the Return/Fill station. The sediment is manually removed and placed in containers. The dumpster sediment is representative of the waste codes described above in items a. and b.
4. **Used Aqueous Parts Cleaning Solvent** - may be bulked at the service center into larger containers that meet DOT specifications or may be co-mingled with the other compatible solvents into the used solvent tank. The aqueous parts cleaning solvent may exhibit the toxicity characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.
5. **Immersion Cleaners** - is a different type of solvent that is not placed in the underground storage tank. Immersion cleaners normally remain in the containers in which they were originally placed until they are received at the recycle center. Drums are placed in the

drum storage area of the warehouse and are stacked no more than two-high in the drum storage area of the warehouse.

Immersion cleaners are non-halogenated hydrocarbon mixtures, and may exhibit the toxic characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

C.2.2 Wastes Resulting from the Dry-Cleaning Services

Dry cleaning wastes consist of used filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in containers meeting DOT specifications. The containers are then palletized, stacked no more than two-high and placed in the container storage area of the warehouse. Approximately 95% of the dry-cleaning solvents used is perchloroethylene (F002 and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The remaining 5% of the solvents is trichloro-trifluoroethane (F002), which is toxic. The hazardous nature of the waste is determined using the toxicity characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

C.2.3 Wastes Resulting from the Paint Service

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and may be toxic as determined by the toxicity characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The wastes are collected in containers which meet DOT requirements at the customer's place of business and containers are then accepted, brought to the Facility, palletized and stored in an enclosed concrete masonry building (the H-3 Flammable Storage Building).

C.2.4 Photographic/Imaging Wastes

Some photographic imaging wastes managed by the Facility are solid wastes per 40 CFR 261.2(c) although their hazardous constituent is reclaimed. Others are managed under the provisions of Subpart F of 40 CFR 266 – Recyclable Materials Utilized for Precious Metals Recovery. Imaging waste consists of three waste streams. These include 1) Photo fixer solution is an aqueous solution used to etch photo film during processing. This material is characteristic for silver (D011). Safety-Kleen recovers the silver from the solution. 2) The second type of waste - used photo developer is an aqueous solution that exhibits no hazardous waste characteristics but shall not be allowed to discharge into public wastewater treatment systems in some communities. The third type of waste comprises silver collection canisters, which shall be sent to a recycling center for reclamation.

C.3 QUALITY CONTROL PROCEDURES

Solvent products are the primary feed stocks for the generation of Safety-Kleen solvent wastes. As a result, quality control of the used solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects used solvents from customers, and an estimated 14,000 drums containing recoverable solvents are returned to the service center each year for shipment to a permitted disposal facility.

The facility performs prescreening for all parts washer and immersion cleaner service customers. The dry-cleaning wastes and paint wastes are generated from facilities where there is one process generating hazardous waste and the possibility of cross-contamination from other chemicals or wastes is minimal. These wastes remain in the container they were originally packaged in until it is received at the facility or other properly permitted recycling or disposal facility. These waste containers shall remain closed from customer to its final disposition.

Prior to leasing a parts cleaning machine or placing a customer owned machine service, the customer's business shall be reviewed. Where the possibility exists for contamination of the parts cleaning solvent (e.g. pesticide, herbicide, or pharmaceutical operations), operations shall be reviewed to ensure that the solvent is protected from the sources of contamination. In reviewing a customer's business, the Facility provides customers with written and verbal information on use of the equipment. This information will contain at a minimum, the following information:

- Proper usage and management of the unit;
- Information on the reasons to not add materials to the unit; and
- Examples of what not to add to the unit

C.3.1 Waste Analysis

The facility shall conduct qualitative/visual analysis of the hazardous waste as a part of all parts washer and immersion cleaner services. Qualitative/visual analysis is not conducted on the dry cleaning and paint waste streams as these containers are not opened by the Safety-Kleen service representative and the likelihood of contamination is remote.

C.3.1.1 Qualitative/Visual Analysis

Safety-Kleen representatives are instructed to visually examine the spent solvent (parts washer and immersion cleaner) when the machines are serviced, noting the quantity, odor, and appearance of the material recovered as follows:

- a. **The Quantity of Spent Solvent in the Drum** – When the amount of parts cleaner solvent or immersion cleaner fluid is more than 25% greater than originally supplied, the container will not be accepted. Contingent upon the customer's responses to Safety-Kleen's inquiry regarding the customer's operation and handling practices, the solvent is

either accepted or left with the customer until an analysis is completed to determine its acceptability.

- b. **The Odor of the Liquid in the Container** – Personnel must never make an effort to “sniff” the solvent. However, if in the normal course of servicing the customer, the odor of the fluid in the container is noticed to be different from that of parts cleaner solvent or immersion cleaner, the container shall not be accepted. Contingent on the customer’s responses to Safety-Kleen’s inquiry of the customer’s operation and handling practices, the solvent may be accepted or left with the customer until an analysis is completed to determine its acceptability.
- c. **The Appearance of the Liquid in the Drum** – The spent parts cleaner solvents normally have a brown or black appearance. Certain contaminants containing dyes and color pigments (such as transmission fluid, printers’ ink, and water-based paints) may change the color of the spent parts cleaner solvent to other colors. The spent immersion cleaner has a dark brown to almost black appearance. The immersion cleaner is a single-phase liquid. Liquids in the containers which deviate from the above description or which contain substantial amounts of water, high density solvent and/or oil at the bottom will be set aside for an analysis to determine their acceptability.

Safety-Kleen trains personnel to verify the physical characteristics of the wastes at several points in the management of the solvents. These procedures are described briefly below.

Safety-Kleen controls the use and management of its solvents by:

1. Limiting the solvents stored to those compatible with one another and their containers;
2. Limiting the uses of each type of solvent for (example, dry cleaning waste is only collected from dry cleaner shops);
3. Determining the customer's type of business (i.e., the Standard Industrial Classification (SIC) code is recorded) and the purpose for which the customer will use the machine;
4. Training customers to use the machines properly;
5. Training personnel to inspect the physical characteristics of used solvents and determine whether it they are acceptable;
6. Indicating on the service document whether the used solvent collected from a customer meets Safety-Kleen's acceptance criteria;
7. Marking each container with the customer's name, address, and EPA I.D. number (if available). This information shall remain on containerized waste until it is accepted at the reclamation facility; and
8. Keeping a record of each incoming and outgoing shipment in the operating log.

Safety-Kleen's customers must sign a service document containing the following information:

- a. The name, address and EPA I.D. number of the facility to which the waste is being shipped;
- b. The customer's name, address and EPA I.D. number (if available); and
- c. The description and amount of facility solvent waste generated.

At the Facility, the personnel managing the hazardous waste observe the quantity, odor, and appearance prior to emptying the parts washer solvent into the wet dumpster. Drums with questionable contents shall be managed as described in Section C.3.1.4. of this Waste Analysis Plan (i.e., Procedures for Unacceptable Shipments).

In addition, receipt analysis is performed by the facility's Recycle Centers on all inbound bulk solvent deliveries. Receipt analysis includes a screen for atypical flash point, PCBs, and halogenated organics.

C.3.1.2 Quantitative Analysis (Lab Analysis)

All new waste streams generated on- or off-site shall be characterized by laboratory analysis. Initial characterization of waste streams from each customer shall be conducted for a minimum of the first three shipments and shall include chemical analyses conducted by a qualified contract chemical analytical laboratory using the appropriate EPA SW 846 analytical methods. Chemical analyses shall, at a minimum include testing for volatile organic compounds (EPA Method 8260D, as updated), semi-volatile organic compounds (EPA method 8270C, as updated), RCRA metals (EPA Method 6010/6020, as updated), flashpoint (EPA Method 1010 or 1020) and pH (EPA Method 9045D, as updated) and any other constituent listed on the product MSDS or that could be present as a result of the use of the product. Sampling of waste streams shall be conducted in accordance with EPA SW 846 sampling methods and EPA's RCRA Waste Sampling Guidance (EPA530-D-02-002, August 2002) appropriate for the container(s) being sampled and the analyses being performed.

After 50 years of servicing over 250,000 parts washer customers each year, Safety-Kleen has determined that the wastes generated by its customers are relatively homogeneous. The homogeneity of these wastes is evaluated annually through the Safety-Kleen Recharacterization Process (Quantitative Analysis).

Recharacterization of waste streams from each customer shall be conducted a minimum of once per year and shall include chemical analyses conducted by a qualified contract chemical analytical laboratory using the appropriate EPA SW 846 analytical methods. Sampling of waste streams shall be conducted in accordance with EPA SW 846 sampling methods and EPA's RCRA Waste Sampling Guidance (EPA530-D-02-002, August 2002) appropriate for the container(s) being sampled and the analyses being performed. Chemical analyses shall, at a minimum include testing for volatile organic compounds (EPA Method 8260D, as updated), semi- volatile organic compounds (EPA method 8270C, as updated) , RCRA metals (EPA Method 6010/6020, as updated), flashpoint (EPA Method 1010 or 1020) and pH (EPA Method

9045D, as updated) and any other constituent listed on the product MSDS or that could be present as a result of the use of the product. Acceptable knowledge (AK) may be used in lieu of chemical analyses; however, AK must be verified with chemical analyses a minimum of once every three years. The generator shall provide the data to the Facility and the data provided by each customer shall be kept on file in the Facility Operating Record.

Hazardous wastes currently included in the re-characterization process are shown below in Table C-3.

**TABLE C-3
WASTE TYPES GENERATED BY THE FACILITY AND ITS CUSTOMERS**

| CUSTOMER GENERATED | SAFETY-KLEEN GENERATED |
|---|------------------------|
| Immersion Cleaner | Branch Debris |
| Petroleum-Based Parts Washer Solvent | Bulk Solvent |
| Paint Gun Cleaner/Paint Wastes/Clear Choice | Dumpster Sludge |
| Dry Cleaning Related Wastes (Perc and Naphtha, filters, bottoms, and separator water) | Tank Bottoms |

The purpose of the re-characterization is to determine the waste codes applicable to waste types managed and generated by Safety-Kleen facilities. As such, a waste stream may be excluded from re-characterization once it has been designated as non-hazardous. Hazardous waste categories that are expected to be phased out of the re-characterization program in coming years include the Dry Cleaning related wastes and Paint Gun Cleaner/Paint Wastes/Clear Choice wastes. Lastly, a set of analytes shall not be omitted if they are not expected; or demonstrated to not be present in a waste stream. Pesticides and herbicides have never been included in the re-characterization process as these constituents are not allowed in wastes picked up by the Facility.

C.3.1.3 Off-Site Waste is analyzed Upon Receipt to verify that the Waste Matches the Description on the Manifest

A Safety-Kleen representative inspects each load of hazardous waste at the generator’s facility for conformance with the Qualitative/Visual Analysis described in Section C.3.1.2. If the waste does not conform to these criteria, a paper profile may be completed, or a sample collected for additional analysis to determine if the waste can be accepted. The waste will be retained at the customer location until the analysis is complete.

In accordance with 40 CFR 264.13(b), Safety-Kleen shall perform physical and chemical analysis of a waste category if notified or has reason to believe that the process or operation generating the waste has changed, or when the result of the Qualitative/Visual Analysis indicates that the waste collected does not match that designated. All of Safety-Kleen’s customers have agreed to notify the Facility if the process generating the waste or nature of his business has changed. If a container with questionable contents is returned to the facility, a sample shall be taken and an analysis will be performed. The container will be held at the facility until analysis is complete. If analysis indicates the waste to be different from what was manifested to the Facility, the waste will be returned to the customer or managed at the Facility in accordance with the customer’s direction. Records of all sampled and/or rejected wastes will be kept on file at the Facility’s main office.

C.3.1.4 Procedures for Managing Unacceptable Shipments

In accordance with 40 CFR 264.13(b), Safety-Kleen shall perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste collected does not match that designated. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been conducted. If a container with questionable contents is returned to the service center, a sample will be taken and analysis will be performed at a qualified chemical analytical laboratory.

C.4 METHODS TO BE USED FOR ENSURING COMPATIBILITY OF WASTES WITH CONTAINERS

C.4.1 Waste Compatibility with Containers

Safety-Kleen manages a limited number of waste streams, most of which originate from new products that are supplied to its customers. The Permittee shall ensure that the chemical composition of these products and wastes are compatible with the containers in which they are stored prior to storage of any new product or waste stream in a container.

C.4.1.1 Procedures for analyzing liquids that are collected in a storage area

All wastes kept at the facility shall be properly segregated. Any container holding waste shall be identified by the container labeling and manifest information. Containers holding product shall be distinguishable from waste containers.

C.4.1.2 Procedures for analyzing ignitable or reactive containerized wastes

Containerized waste received at the facility is analyzed according to the procedures described in the Waste Analysis Plan (WAP) Section C.3.1.2. All ignitable wastes stored at the facility shall be compatible with each other and the containers in which they are stored.

C.4.1.3 Procedures for determining compatibility of waste to be placed in the same container

The only waste containers opened at the facility for transfer of content are the containers holding the solvent waste, which is discharged and subsequently co-mingled in the underground storage tank. Compatibility of the waste with tanks is discussed below. The remaining containers of wastes are not opened at the facility, except for the purpose of sampling and shall not be mixed with waste in other containers.

C.4.1.4 Procedures for determining compatibility of wastes previously held in reused containers that were not decontaminated

The only containers reused at the facility are drums containing spent parts washer solvent. These drums are emptied and washed with same solvent in a drum washer and are then refilled with clean solvent for delivery to customers. As the only material placed in these drums is new or spent solvent, there is no potential for contact with incompatible materials.

C.4.1.5 Procedures for determining compatibility to other wastes stored nearby

Safety-Kleen shall verify that all wastes stored at the facility are compatible with each other based on the procedures described in Section C.3.1.2 of this WAP. Incompatible wastes shall be segregated from other waste, if stored at the Facility.

C.4.2 Waste Compatibility with Storage Tanks

C.4.2.1 Procedures for analyzing liquids collected in the collection area

Waste received at the facility shall be analyzed according to the procedures described in the Waste Analysis Plan (WAP) Section C.3.1.2 and shall be compatible with each other and the tanks in which they are stored.

C.4.2.2 Procedures for determining compatibility of a waste to a tank

The only waste stored in the aboveground storage tank is spent parts washer solvent. This material has been analyzed and is compatible with the steel tank in which it is stored.

C.5 ORGANIC AIR EMISSION REQUIREMENTS

The Permittee manages wastes that are subject to organic air emissions requirements of 40 CFR Part 264, Subpart CC. For wastes that are not eligible for exemption, the Permittee shall address the applicable requirements for control of air pollutant emissions as follows:

1. In lieu of determining the concentration of VOCs in a waste at the point of generation, the Permittee may declare that a container holding the waste is subject to the requirements of 40 CFR Part 264, Subpart CC.
2. To determine the VOC concentration, the Permittees shall follow the waste determination procedures specified in 40 CFR 264.1083(a). If sampling and analysis is necessary, it shall be performed in accordance with the methods specified in this Permit Attachment.
3. Whenever changes to the source generating the waste are reasonably likely to or may potentially cause the average VOC concentration of the hazardous waste to increase to a level that is equal to or greater than the applicable VOC concentration limits specified in 40 CFR § 264.1082, a new waste evaluation shall be performed by the Permittee, as specified in 40 C.F.R. § 264.1083(a)(1)(ii).
4. The Permittee shall review the characterization documentation for VOCs as part of the characterization process discussed in Section C.3 of this Permit Attachment.

5. Characterization of routinely generated hazardous wastes that are subject to 40 CFR Part 264, Subpart CC shall be reviewed and updated at least once every 12 months to determine whether Subpart CC requirements continue to apply.

C.6 RESERVED

C.7 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is a permit modification and shall be implemented in accordance with the applicable procedures included in 40 CFR 270.42.

PERMIT ATTACHMENT D CONTINGENCY PLAN

D.1 PURPOSE

The Contingency Plan describes the actions to be taken in the event of a spill, fire, explosion, or other emergency.

The Contingency Plan shall be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment. The Contingency Plan shall be kept at the Facility Office. The Branch Manager shall ensure that the Contingency Plan is updated whenever a change is made. Modifications to this Contingency Plan shall be conducted in accordance with 40 CFR 270.42.

D.2 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to the Albuquerque Fire and Police Departments and the Presbyterian Hospital. They may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan shall be reviewed and updated, if necessary, whenever:

- a. The facility is modified to allow new wastes to be stored or treated, or applicable regulations are revised;
- b. The list or location of emergency equipment changes;
- c. The facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
 - (1) increases the potential for fires, explosions, or releases of hazardous constituents,
or
 - (2) changes the response necessary in an emergency;
- d. The names, addresses, or phone numbers of Emergency Coordinators change;
- e. The employee assigned to each emergency task changes jobs; or
- f. The plan fails when implemented in an emergency.
- g. Other changes if a deficiency is identified.

D.3 EMERGENCY RESPONSE PERSONNEL

D.3.1 Emergency Coordinator Responsibilities

The Branch Manager is the Emergency Coordinator; and the Alternate Emergency Coordinator is a trained employee designated to this position by the Branch Manager. However, all employees

must be familiar with the procedures in this plan and are responsible for proper implementation of the plan.

The Emergency Coordinator and Alternate must be familiar with all aspects of this Contingency Plan, the operations and activities at the facility, the location and characteristics of hazardous waste managed and stored at the Facility, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the Contingency Plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Table D.1. At least one employee shall be at the facility or on call to respond to an emergency situation. A list of emergency equipment available at the facility is included as Table D.3. In addition, facility personnel shall be aware of the location of emergency equipment.

TABLE D.1
Emergency Coordinator List for the Facility

Facility Emergency Coordinators

Primary

Scott Dolk
Market sales specialist
2720 Girard Blvd. NE
Albuquerque, NM 87108
Main (office) Phone (505) 884-2277
Cell Phone (505) 506-6360

Alternate

Angel Chavez
Lead Material Handler
2720 Girard Blvd. NE
Albuquerque, NM 87107
Main (office) Phone (505) 884-2277
Cell Phone (505) 415-2010

Additional Emergency Notification Phone Numbers

Internal (24-Hour) (800) 468-1760
Safety-Kleen (800) 468-1760

External

National Response Center (800) 424-8802
New Mexico Environment Department (505) 476-6000; (505) 827-9329 (24 Hour)

Designated Emergency Response Authorities

Albuquerque Fire Department (emergency) 911; Station #19 [Non-emergency (505)888-8100]
Albuquerque Police Department (emergency) 911; [Non-emergency (505) 242-2677]
Presbyterian Hospital (emergency) (505) 222-2995; [Non-emergency (505) 841-1234]
Clean-up contractor; 24-hour (800) 468-1760
Poison Control Center (505) 843-2551

Internal Branch Paging System

Intercoms are located on all telephones and can page all offices and warehouse areas to notify employees of an emergency.

D.3.1.1 Assess the Situation

Whenever there is a release, fire, or explosion, the Emergency Coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. In the event of a fire, or explosion or release of toxic gas, the Emergency Coordinator must immediately contact emergency responders (e.g., Albuquerque Fire Department).

D.3.1.2 Protection of Personnel

Concurrently, the Emergency Coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

D.3.1.3 Contain or Mitigate Hazards

During an emergency, the Emergency Coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

D.3.1.4 Post-Emergency Actions

After an emergency has been mitigated and otherwise addressed, the Emergency Coordinator must ensure that all facility equipment and response equipment is properly cleaned and decontaminated (if reusable), and that all waste, spill recovery material and disposable equipment is properly managed and disposed.

D.3.2 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is shown in Table D.1., and explained as follows:

- a. The person who discovers/causes the spill reports to the Emergency Coordinator.
- b. Based on the information gathered, the Emergency Coordinator will determine if the emergency warrants implementation of the Contingency Plan.
- c. The Emergency Coordinator contacts the Safety-Kleen Emergency Response Coordinator and NMED.

- d. The Emergency Coordinator will act as an Incident Commander until an outside resource (i.e. Fire Department or Spill Cleanup Contractor) arrives onsite; then they will assume Incident Commander duties.

D.3.3 Government Agencies and Local Authorities to be notified during an Emergency

The following government agencies and local authorities listed in Table D.2 shall be notified during an emergency since the Facility has a memorandum of Agreement with them:

TABLE D.2.

| Agency or Authority | Rationale / Service Provided |
|--|---|
| Albuquerque Police Department | Notify if there is imminent danger to human health. May assist with traffic control and evacuation (if required) if there is imminent danger to human health. |
| Albuquerque Fire Department | Notify is there is a fire, explosion, uncontrolled spill, or other imminent danger. |
| Presbyterian Hospital | Assist in providing emergency care of any injuries. |
| New Mexico Department of Public Safety | Notify if human health or the environment outside the Facility is threatened. |
| National Response Center | Notify if human health or the environment outside the Facility is threatened. |
| NMED | Report releases, fires, and explosions. |
| SK Emergency Response Contractor | Call to obtain assistance with remedial action after a release |

The Permittee shall familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility and possible evacuation routes. Arrangements shall also be made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

Notifications, including a copy of the Contingency Plan, shall be provided to local emergency response agencies via mail or email, and a signed acknowledgement form is requested from each

entity. If an agency refuses to enter into an agreement, this shall be kept on file. Notification of any significant modifications to the Contingency Plan shall also be provided to these agencies.

D.4 RESPONSIBILITIES THE EMERGENCY COORDINATOR DURING AN EMERGENCY

Whenever there is an imminent or actual emergency situation that requires implementation of the Contingency Plan, the Emergency Coordinator (or alternate when the Emergency Coordinator is not available) must immediately:

- a. Activate the internal facility communication system to notify all facility personnel; Initiate facility evacuation, if necessary
- b. Notify appropriate state or local agencies with designated response roles, as necessary. Reference Table D.2 above; and
- c. Notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number – (800) 468-1760.

D.4.1 Emergency Response Procedures

Response actions to be taken in specific emergency situations are described in the following sections.

D.4.1.1 Fire Control Procedures

If a small fire occurs, personnel may respond quickly with an appropriately rated fire extinguisher to put out the fire before it spreads. If it cannot be extinguished immediately the facility shall be evacuated and the fire and police departments shall be contacted.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those which can immediately be extinguished using a fire extinguisher. Any fire which cannot be brought under control immediately or which has the potential to become uncontrollable shall warrant implementation of the evacuation plan. Ignitable waste at the Albuquerque facility is stored in specially designed tanks or containers and placed in the Flammable Storage Building.

Safety-Kleen personnel and local authorities must be made aware of appropriate response procedures, should a fire occur at the facility. This may include isolating the hazardous area and donning appropriate positive pressure breathing apparatus.

D.4.1.2 Container Storage Unit-Flammable Warehouse-Fire Control Procedure

A small fire in this area can be assessed by Facility personnel, and if deemed safe to handle, may be extinguished using an ABC-rated fire extinguisher present in this area. Should the automated

suppression system activate, personnel shall leave the area and allow the system to extinguish the fire.

The Flammable Storage Warehouse and adjacent Return and Fill is protected by a fire suppression system. The extinguishing medium is water supplied through the City of Albuquerque. The system is maintained under pressure (approximately 87 pounds per square inch-psi) and consists of 16 sprinkler heads with a discharge capacity of 350 gallons per minute (GPM). If the suppression system activates, the Albuquerque Fire Department shall be notified by Facility personnel, who shall evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel will provide details on inventory and site information to assist the Fire Department.

D.4.1.3 Container Storage Units East and West

A small fire in this area will be assessed by Facility personnel, and if deemed safe to handle, may be extinguished using an ABC-rated fire extinguisher present in this area. If necessary, the Albuquerque Fire Department will be notified by Facility personnel, who shall evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel shall provide details on inventory and site information to assist the Fire Department.

D.4.1.4 Tank Storage Area

There are two 12,000-gallon storage tanks at this facility. One is used for storage of product petroleum naphtha solvent (with a nominal 150°F flash point); and one tank is used for storage of used/spent petroleum naphtha solvent. The tanks are underground storage tanks.

Examples of potential fire response procedures that may be required are described below.

1. Isolate the hazard area and deny entry to unauthorized personnel.
2. Stay upwind, keep out of low areas.
3. Ventilate closed space before entering (if this can be done safely)
4. Wear personal protective clothing.
5. Evacuate an adequately protective radius (if required).

Wastes that may be involved with the fire can be identified by the following methods:

- a. Location of the container in the storage unit
- b. Label on the container (if safe to observe).
- c. Records of wastes stored onsite in the administrative office area

If possible, emergency response personnel shall take measures necessary to collect and contain potentially hazardous run-off of fire suppression material (i.e. water, foam) and the contents of container/s involved. This may require construction of temporary berms or use of absorbent materials to prevent migration to storm drains or sewers.

D.4.1.5 Explosion

Response actions to be taken in the event of an explosion or imminent threat of an explosion are:

- All facility personnel must immediately evacuate the area.
- The Emergency Coordinator must be notified. Due to the small size of the Facility, this notification will most often be by verbal notification if the Emergency Coordinator is onsite; or by telephone if offsite.
- The Emergency Coordinator will immediately make the necessary notifications to the appropriate contacts/agencies listed in Table D.2.

- If required, the Albuquerque Fire Department will be notified by Facility personnel, who will evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel will provide details on inventory and site information to assist the Fire Department.

The procedures detailed in Sections D.4.1 through D.4.3 may be required in the event of an explosion or imminent explosion.

D.4.1.6 Unintended Releases

Response actions to be taken in the event of a release of a hazardous waste or hazardous substance are described in the sections that follow. Employees must assess the possible hazards to human health or the environment (air, water, or soil) that may result from an unintended release. Identification of the material released may consist of review and a Safety Data Sheet (if the material is a Safety-Kleen product), the container label, or the hazardous waste manifest.

D.4.1.7 Minor Spills

A minor spill (as referenced in this Contingency Plan) is a spill that occurs within secondary containment and does not involve a release of material to the environment. This type of spill involves spills and leaks from containers (typically 5-gallon through 250 gallon containers). A minor spill does not necessarily require implementation of the Contingency Plan.

D.4.1.8 Parts Washer Solvent (Petroleum Naphtha)

Transfer of Safety-Kleen's petroleum naphtha solvent is the primary activity where containers are opened and clean and used solvent pumped or emptied. If a spill should occur while pouring used solvent into a dumpster or filling drums with solvent product at the Return and Fill station, it shall be contained in the secondary containment at the base of the Return and Fill station, remedial action shall be conducted as necessary. Any material released into the secondary containment shall be recovered by absorbent materials that will be properly managed as site-generated waste. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

- a. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents shall be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.
- b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a permitted facility for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse or Return and Fill Tank, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse are prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows shall be opened to improve the ventilation in the confined area. If solvent is spilled or is flowing in a non-explosion rated area, all sources of ignition (e.g., thermostats or light switches) shall be left in the same position (either on or off) as at the time of the spill. The worker shall enter the area wearing appropriate personal protective equipment (PPE). The (MSDSs) will be consulted to ensure appropriate PPE and spill procedures are utilized. Generally, spilled liquids are collected, placed in a container, and returned to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department (if the spill is of a reportable quantity). In the event a container is leaking, the contents shall be transferred to a new container with a portable pump or a wet/dry vacuum

D.4.1.9 Major Spills

Any spill which cannot be completely remediated is considered to be a major spill. Examples of a major spill are: a failure of secondary containment, vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material which escapes containment can contaminate soil, surface water, groundwater, and/or sanitary sewer systems. Safety-Kleen's Emergency response protocol for this type of spill must be as follows:

- a. Assist any injured people, and call for medical assistance as necessary.
- b. Stop the flow of material, if possible.
- c. Retain, contain or slow the flow of the material if it cannot be stopped.
- d. If solvent escapes containment efforts, immediately call the local Fire Department, and report to the Emergency Coordinator and the Safety-Kleen Emergency Response Coordinator.
- e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The Emergency Coordinator shall report any incident as soon as possible to the Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number: 800/468-1760. The Emergency Coordinator shall call an emergency cleanup response contractor, if it is deemed necessary. The incident shall be reported to the National Response Center (telephone: 800/424-8802) and NMED (telephone: 505/827-9329 24-hour number), and the New Mexico Department of Public Safety (telephone (505) 827-9282).

The person reporting a spill must be prepared to give:

1. Their name, position;
2. The Company name, address, and telephone number;
3. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, the containment status and specify any equipment needed; and
4. The extent of injuries (if any).

Equipment used to respond to spills must be cleaned and decontaminated with a detergent/water solution. All incidents will be documented and kept on file as part of the operating record and reviewed with branch personnel to prevent similar spills from occurring in the future.

All rinsates, waste residues, and decontamination fluids from the cleanup of spills or releases (whether major or minor), shall be containerized and managed as hazardous waste unless analytical results verify the wastes are not hazardous. Wastes resulting from spill cleanups shall be disposed in accordance with applicable regulations.

D.4.1.10 Response to Release from Tanks

The tanks at this Facility are underground storage tanks. Any release will be detected by the interstitial monitoring system (Veeder-Root) or by noting unexplained inventory deviations. The following actions will be taken:

- All transfers into the tank will be stopped immediately.
- As soon as practicable, remove as much of the material in the tank as practicable to prevent further releases of the material to the environment. This will typically be accomplished by transferring material into containers or pumping into a tanker.
- Containment of released material shall begin as soon as practicable.
- Report the release to the NMED Hazardous Waste Bureau in accordance with the applicable parts of Permit Section 1.9.9.
- Implement Emergency Interim Measures, if necessary, in accordance with Permit Section 7.8.3.
- Initiate corrective action as necessary in accordance with Permit Part 7.
- If investigation indicates a major repair is needed to the tank system, implement the repairs and obtain certification by a qualified Professional Engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. Records of the repairs and the certification shall be placed in the Operating Record and maintained until closure of the facility.

D.4.1.11 List of Emergency Equipment

The following is a list of Emergency Equipment available at the Facility.

TABLE D.3

| Description | Location | Quantity | Capabilities |
|--|--|-----------------|---|
| Dry Chemical Fire Extinguishers-Hand held (type ABC) | Office area, warehouse, storage shed, return and fill shed | 12 | Able to extinguish type A, B, and C fires |
| Fire Suppression System | Flammable Storage Warehouse and Return and Fill | 1 | Able to contain and/or extinguish fire when activated |
| First Aid Kits | Office/warehouse area | 2 | Provides items used to give basic medical attention |
| Eye wash station | Warehouse area, at return and fill | 3 | Provide a means of rinsing possibly harmful substances from the eyes and skin |
| Shower | Office area, warehouse area | 2 | Decontaminate plant personnel in the event of a spill or release of harmful material |
| Telephones/paging system | Office/warehouse area, return and fill | 8 | Alert personnel of an on-site emergency or spill incident, evacuation orders and general in-plant communications |
| Alert horn/strobe light | Tank farm | 1 | Sounds and flashes when tanks are at 95% capacity |
| Spill Kits / Absorbents | Tank farm, warehouse, return and fill areas | 3 | Able to contain and absorb spilled liquids There is also a supply of absorbents for sale that can be accessed in the event of an emergency |

D.5. FACILITY EVACUATION PLAN

When an uncontrolled fire or release has occurred, all personnel shall be evacuated from the area and assembled across Girard Boulevard to ensure that all personnel are accounted for and out of

the area. The order for evacuation may be given by verbal announcement via the facility paging system or by verbal cry/shout. The City of Albuquerque Fire Department must be notified at the time of evacuation either from a safe on-site building, from a neighboring facility, or using a cellular phone.

Exits shall be clearly marked in the warehouses and office areas. Employees shall be trained to be aware of all potential escape routes. The Facility evacuation plan is presented in Figure 6, Permit Attachment L (Figures).

D.6 POST EMERGENCY ACTIONS

Immediately after an emergency, the Emergency Coordinator must ensure that the following activities are not conducted in the affected area(s) of the Facility:

- a. Monitoring for possible leaks, pressure buildup, and ruptures in pipes or valves does not occur until normal operations are resumed;
- b. No substance that may be incompatible with the released material shall be brought on site until cleanup procedures are completed; and
- c. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use (if reusable), or is replaced before operations are resumed.

D.7 REPORTING

The Permittee shall notify all appropriate state and local authorities that the Facility is in compliance before operations are resumed in the affected area(s) of the Facility.

The Emergency Coordinator must document the time, date, and details of any incident that requires the implementation of the Contingency Plan. Within 5 days of the incident, the Permittee shall submit a written report on the incident to the New Mexico Environment Department in accordance with Permit Section 1.9.9. At a minimum, the report shall contain the following:

- a. Name, address, and telephone number of the owner or operator;
- b. Name, address, and telephone number of the facility;
- c. Date, time, and type of incident (e.g., fire, explosion);
- d. Name and quantity of material(s) involved;
- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. Estimated quantity and disposition of recovered material that results from the incident.

PERMIT ATTACHMENT E INSPECTION PLAN

E.1 INTRODUCTION

The following Table E-1 is a summary of the inspection schedules detailed in Tables E-2 through E-6. Those Tables are presented at the end of this Permit Attachment.

TABLE E-1: FACILITY INSPECTION SCHEDULES

| Area / Item to be Inspected | Criteria | Frequency |
|--------------------------------------|--|--------------------|
| SAFETY AND SECURITY EQUIPMENT | | |
| Fence / Gate / Signage | Gate is functioning, fence is intact and in good condition, warning signs present and not faded | Weekly |
| Emergency Eyewash / Shower | Present and functioning; access not blocked | Weekly |
| Fire Extinguishers / Suppression | Extinguishers-present, adequately charged, tagged. Suppression system-adequate pressure | Weekly |
| Spill Clean Up Equipment | Stocked and accessible | Weekly |
| TANK SYSTEM | | |
| Tank Volume | Sudden deviations in the solvent volume will be investigated and their causes determined | Each operating day |
| High Level Alarm | Test for aural and visual alarming | Each operating day |
| Interstitial Monitoring System | Evidence of liquid in containment space indicating leak | Each operating day |
| CONTAINER STORAGE UNITS | | |
| Volume in storage area | Volume cannot exceed permitted storage capacity | Each operating day |
| Containers in storage area | Evidence of leaks, bulging or corrosion of containers, proper closure, required labeling, adequate aisle space | Each operating day |
| Secondary containment | Inspect for evidence of spills, cracks or gaps, deterioration | Each operating day |

E.2 INSPECTION SCHEDULE

The Branch General Manager or designate is responsible for ensuring that Facility inspection and documentation are carried out. The inspections are performed each operating day (typically Monday through Friday). During the inspection, the inspecting personnel must note any repairs that are needed and ensure that they are completed. If the repairs cannot be implemented by onsite personnel, the Engineering Department must be notified for assistance. Completion of repairs must also be documented on the Facility Operation Record.

E.2.1 Tank Inspections

The tank system holding the used 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 solvent volume shall be investigated and their causes determined. If necessary, repairs shall be initiated immediately. The solvent shall not exceed 95% of the tank volume at any time.

A liquid sensing leak detector is located between the two walls (secondary containment) of the tanks and the recorder chart must be checked each operating day. Any leaks detected which may indicate a leak or damage to the secondary containment must be noted and repairs initiated.

E.2.2 Container Storage Units

The container storage units or areas shall be inspected each operating day, typically Monday through Friday for leaks or damage to the containers. The total volume of the material held in the drum storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect drums must immediately be placed in a drum of adequate integrity. The drums must be properly labeled and marked in accordance with U.S. DOT, EPA and New Mexico hazardous waste regulations. The secondary containment systems must be inspected for deterioration or failure. If cracks or leaks are detected, repairs shall be initiated immediately.

E.2.3 Dumpster/Drum Washers

The two wet dumpsters/drum washers in the Return and Fill Station must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster.

E.2.4 Recording of Inspections

The results of Daily and Weekly inspections shall be documented in the Facility Operating Record. The documentation may be recorded and maintained electronically. The electronic inspection records shall be producible in paper or electronic copy at the time of a request for records by NMED.

The following Tables E-2 through E-7, contain the detailed items the Facility personnel shall inspect for, during the daily and weekly inspections:

TABLE E-2

Inspection Log Sheet for Weekly Safety and Security Inspection Form:

Inspector's Name / Initials / Title:

Date (M/D/Y): _____ Time: _____

SAFETY AND EMERGENCY EQUIPMENT: [A = Acceptable N = Not Acceptable]

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 gloves, glasses, 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 – faded or missing, barbed wire – missing or damaged, 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)

TABLE E-3

Weekly Safety-Security Inspection (Electronic Producible Form, Code 29)

Inspector's Name

Inspection Date

Area of Inspection

Safety Security Inspection Instructions

Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.

Safety Security Inspection Items

Perimeter Fences - Check for evidence of failure (e.g., broken ties, corrosion, holes, distortion, other).

Gates - Check for evidence of failure (e.g., locking mechanism, broken ties, corrosion, holes, distortion, other).

Warning Signs - Check for evidence of failure

(e.g., missing, faded, other).

Exit Signs - Check for evidence of failure (e.g., missing sign, illumination, lamp bulbs, and battery backup, other).

Exits/ Fire lanes/ Evacuation Routes - Check that all routes are clear or unobstructed.

Lighting System - Check for evidence of failure (e.g. expired lamps, effectiveness, location, other).

Emergency Lighting System - Check for evidence of failure (e.g., expired lamps, battery backup, effectiveness, other).

Accessibility of Safety Equipment/ Protective Gear - Check for evidence of availability (e.g., hardhats, face shields, goggles, safety glasses, boots, gloves, clothing, duct tape, absorbents, other).

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

**INSPECTION LOG SHEET FOR:
DAILY INSPECTION OF EAST CONTAINER STORAGE UNIT (Table E-4 Continued)**

PERMITTED STORAGE VOLUME: **2,680 gallons**

| | | | | | |
|---|-------|-------|-------|--------|-------|
| INSPECTOR'S NAME / INITIALS / TITLE | _____ | _____ | _____ | _____ | _____ |
| INSPECTOR'S INITIALS: | _____ | _____ | _____ | _____ | _____ |
| DATE (D/M/Y): | _____ | _____ | _____ | _____ | _____ |
| TIME: | _____ | _____ | _____ | _____ | _____ |
| CONTAINERS | MON. | TUES. | WED. | THURS. | FRI. |
| Total Volume of Dry Cleaning Waste: | _____ | _____ | _____ | _____ | _____ |
| Total Volume of IC Waste: | _____ | _____ | _____ | _____ | _____ |
| Total Volume of Waste: | _____ | _____ | _____ | _____ | _____ |
| Total Volume of 10- Day Transfer Waste: | _____ | _____ | _____ | _____ | _____ |
| Total Volume of Liquid Product : | _____ | _____ | _____ | _____ | _____ |
| TOTAL VOLUME (IN GALLONS) | _____ | _____ | _____ | _____ | _____ |
| A*** N | 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: | | | | | |
| _____ | | | | | |
| CONTAINMENT: 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: _____ | | | | | |

[A = Acceptable N = Not Acceptable].

**TABLE E-5
INSPECTION LOG SHEET FOR:**

Daily Inspection of HAZARDOUS WASTE STORAGE TANK SYSTEM

INSPECTOR'S _____
NAME /INITIALS _____
/ TITLE _____
INSPECTOR'S _____
INITIALS _____
DATE: (M/D/Y) _____
TIME: _____

STORAGE TANKS: 95% Level 11,400 gallons

| (WASTE MON. TUES. WED. THURS. FRI. |
|--|
| SOLVENT TANK |
| ≤ 95% FULL) |
| Waste Solvent ____ * Tank (in./gal) |
| Product Solvent Tank (in./gal) |
| Tank Volume A** N A N A N A N A N |
| 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: _____

CONTAINMENT

UST LEAK DETECTION SYSTEM CHECK A N A N A N A N A N

RETURN AND FILL STATION:

Motors: A N A N A N A N A N

If 'N', circle appropriate problem: overheating, other:

Hose Body: A N A N A N A N A N

If 'N', circle appropriate problem: crushed, loose, leaks, other:

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,

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":

TABLE E-6

DAILY TANK STORAGE SYSTEM INSPECTION (Electronic Producible Form)

Inspector's Name

Inspection Date

Area of Inspection

Tank Systems Inspection Instructions

Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.

Tank Systems Inspection Items

Tanks - Check for evidence of failure (e.g., rusty or loose anchoring, distortion, paint failure, other).

Pipes - Check for evidence of failure (e.g., distortion, corrosion, paint failure, other).

Valves - Check for evidence of failure (e.g., disconnected, corrosion, other).

Fittings - Check for evidence of failure (e.g., loose, disconnected, corrosion, other).

Liquid Level - Check for acceptable level. (e.g., high level max, permitted volume, other).

Monitoring Equipment - Check for evidence of failure (e.g., pressure and temperature gauges, level indicators, other).

Loading/ Unloading Areas - Check condition of area (e.g., available equipment, spill response, containment, pad condition, other).

Compliance Footer

Inspector Signature

Attach Photo

On Demand Work Ticket

PERMIT ATTACHMENT F

PERSONNEL TRAINING PLAN

F.1 INTRODUCTION

The purpose of training is to familiarize employees with environmental regulations, records, and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program shall be designed to ensure that facility personnel can respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. All employees shall receive basic training on Hazard Awareness and the facility Contingency Plan (Permit Attachment D). The level of training an employee receives is dependent upon the employee's level of involvement in hazardous waste management.

Each employee shall be trained to operate and maintain the facility safely, and to understand hazards unique to hazardous waste management. This section contains information on Facility personnel and trainers, job descriptions, training outlines and training record forms. All employees at the facility shall have training that satisfies the requirements of 40 CFR § 264.16. An employee shall not work in an unsupervised position until he or she has received proper training as outlined in Table F-1 (Outline of RCRA Training at the Facility).

F.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

The Facility office provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for facility personnel that is in accordance with 40 CFR § 264.16(a). Job descriptions may change as business needs dictate. A list of employees, their job titles, training, and job functions shall be maintained in the Facility Operating Record.

F.2.1 Branch General Manager

The Branch General Manager (or designate) is ultimately responsible for the operations at the Facility. The sales representatives, administrator, and Material Handler report to the Branch Manager and he in turn, must provide the training and materials necessary for the facility employees to execute their duties. With respect to environmental compliance, the Branch Manager must:

- keep the service center clean and orderly;
- execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;
- know the potential hazards of the material and waste handled on site;
- identify potential spill and fire sources and be able to execute the contingency plan;
- inform all employees of their environmental responsibilities;

- act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office; and
- maintain all environmental records (such as manifests, training records and spill reports) on file.

F.2.2 Corporate Compliance Department

Safety-Kleen’s Compliance Department shall have personnel on staff who shall provide guidance to divisional and regional personnel for training, permitting, and other compliance issues for service centers in any given geographic area of the country.

F.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training is accomplished using classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The Training Department prepares a training program for employees and the Service Center personnel provide documentation that the program has been executed. The following Table F-1 is a summary of the training Facility personnel must take and the frequency of refresher training courses:

TABLE F-1: FACILITY PERSONNEL THAT MUST TAKE RCRA TRAINING

| Job Title | Prior to Starting Work | On The Job | Annually | When Regulations or Procedures Change |
|-------------------------------|------------------------|------------|----------|---------------------------------------|
| Branch General Manager | X | X | X | X |
| Branch Administrator | | X | X | X |
| Sales/Service Representatives | X | X | X | X |
| Warehouse Employees | X | X | X | X |

F.4 OUTLINE OF TRAINING PROGRAM

An employee shall be trained prior to starting work or as soon as he or she begins working (depending on his or her position) and shall take a refresher course annually thereafter. The environmental health and safety Department ensures that the Branch General Manager or his/her designate has received adequate training to be able to train all branch personnel. Table F-2 contains an example outline of the training program, which demonstrates that facility personnel are trained in hazardous waste management procedures.

F.4.1 Training of New Branch Managers

New Branch General Managers shall be fully trained before they begin their new positions. This training occurs on site, on-the-job, in off-site classroom training, electronic (i.e. video, e-Learning), written, and on-the-job methods. While being trained, a new Branch General Manager shall review all environmental records and learns the recordkeeping requirements. These records include manifests, personnel records, training records, facility inspection records, and spill reports.

The training consists of an introduction to environmental law and a review of the operating Permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan. Additional time is spent reviewing past environmental compliance at the Branch General Manager's facility. Environmental protection regulations unique to the state shall be discussed as well.

F.4.2 Training of New Branch Administrators

Branch administrators shall be trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. Additional training is overseen by the Branch Manager and is done within six months of starting if needed. It may include the items listed in the RCRA Training Plan Outline presented in Table F-2, and include emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues.

F.4.3 Training of New Sales Representatives

New sales representatives shall be introduced to the operating Permit, which includes: Waste Analysis Plan, Preparedness and Prevention Plan and the Contingency Plan. A representative also shall be trained as a designate for performing the facility inspection. Additional training shall be conducted in the form of classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The representative shall become familiar with the Contingency Plan before the representative formally begins the new position. All items listed in Table F-2 shall be completed within six months of starting work at the Facility.

F.4.4 Training of New Hazardous Waste Management Personnel

All hazardous waste management personnel shall be trained to maintain the Facility and assist the other branch employees in their tasks. A material handler may also be trained as the designate for performing the daily inspection. Additional training may be in the form of videotape presentations, classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The Contingency Plan shall be reviewed with the Branch Manager before the new hazardous waste management personnel formally begins his/her new position, and annually

thereafter. The Material Handler must review the items listed in Table F-2 within six months of hire.

TABLE F-2: OUTLINE OF RCRA TRAINING AT THE FACILITY

I. Introduction: Major plans to be discussed include the following items A through C:

- A. RCRA Contingency Plan and Preparedness and Prevention Plan
- B. Spill Plan Control and Countermeasures Plan
- C. Storm Water Pollution Prevention Plan

II. Measures that the Facility shall take to avoid sounding the emergency alarm

a. Storage and release prevention measures

i. Best Management Practices

- 1. Housekeeping
- 2. Keep the drum storage drum areas clean and clear
- 3. Pick up debris
- 4. Maintain adequate Aisle space
- 5. Ensure container security – lids kept on and secured
- 6. Waste shall not be stacked over 2 tiers high

ii. Preventative maintenance

- 1. Daily/weekly inspections
- 2. Keeping containers closed. Check container integrity at all times
- 3. Have Spill Equipment available at all times
- 4. Fire extinguishers shall be maintained and inspected as per schedule
- 5. PPE shall be worn by Facility personnel as required
- 6. First aid kits
- 7. Eye wash

iii. Security

- 1. Keep unauthorized / untrained people out of the area
- 2. Use the facility sign-in log
- 3. Keep doors closed and locked
- 4. Enforce the above measures listed in items 1 through 3 under Section iii.

III. Measures that the Facility shall take if the above practices fail and a spill occurs

A. Activation of the site Contingency Plan

- i. Contact the Groups on Emergency response list
- ii. Implement Emergency Plan/Coordinators role
- iii. Activate Response preparation
- iv. Conduct the following response actions
 - 1. Emergency shut-off switches
 - 2. Major/minor spills
 - 3. Fires
 - 4. Earthquakes
 - 5. Evacuation procedures
- v. Notification requirements

B. Transportation Contingency Plan

- i. Emergency response list

- ii. Response preparation
- iii. Response actions
- iv. Notification requirements

F.4.5 Annual Training

On an annual basis, employees shall be trained using a program prepared and updated annually by Facility regional and/or corporate compliance offices and health and safety department. The annual training shall include updates on environmental regulations, an in-depth review of the Contingency Plan and a review of RCRA inspection criteria.

Facility employees shall annually review the actions listed in Table F-2. This review may be in the form of slide/tape, videotapes and/or classroom presentation, and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental regulations shall be provided by the Facility's regional/corporate offices. The regulations shall be read and discussed by branch personnel.

F.5 TRAINING RECORDS

All employee regulatory training must be documented in the Facility Operating Record. Records of current employees shall be kept at the facility until closure. Some training documentation may be maintained electronically. Training records for employees shall be kept for 3 years after termination of their employment.

PERMIT ATTACHMENT G CLOSURE PLAN

G.1 INTRODUCTION

The Facility operates as a storage facility for hazardous wastes. The hazardous waste management units (HWMUs) and ancillary waste management facilities must be closed in accordance with the closure requirements of 20.4.1.900 NMAC incorporating 40 CFR §264.111 through §264.115. Closure of the facility shall be carried out in accordance with the steps outlined in this plan. Implementation of this plan is intended to minimize the need for further maintenance and control, minimize, or eliminate the post-closure escape of hazardous wastes, hazardous constituents, contaminated runoff, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere. Procedures to achieve these objectives, which shall meet the closure performance standard in 20.4.1.500 NMAC and 40 CFR §264.111, are described below.

The Hazardous Waste Management Units (HWMUs) subject to closure include an underground storage tank system, a return and fill station with drum washers, two container storage areas, a flammable storage building and associated loading dock areas. This closure plan identifies steps necessary to conduct facility closure, or closure of a unit (partial closure). Amendments to the closure plan shall be conducted in accordance with 20.4.1.500 NMAC incorporating 40 CFR 264.112(c)(2). Closure shall be implemented in accordance with the schedule included in Permit Section 5.

The Facility comprises the following 5 structures.

1. One 2,500 square foot warehouse with offices, bathrooms, a sales representative room, and two containerized areas (east and west) for drum storage;
2. Two 12,000-gallon underground storage tanks for clean and used solvent;
3. A solvent return and fill station with a loading dock;
4. One enclosed building used for flammable storage; and
5. One Building with administrative offices and general warehousing.

This facility is an accumulation point for various hazardous wastes generated by Safety-Kleen customers. Wastes are ultimately transported to a Safety-Kleen recycling facility, an authorized disposal site, or a permitted facility for processing. There is no onsite hazardous waste processing or disposal.

A complete physical and operational description of the Facility is in Permit Attachment A. The various Facility components are shown generally on Figure 2, Permit Attachment L (Figures).

The Facility is permitted to manage and store hazardous wastes with the EPA waste codes listed in Permit Attachment B, Section B.2, in containers and tanks. The operating capacities of the four storage units are specified in Permit Attachment J, Table J-1.1.

It is anticipated that the Facility will be clean closed. The Permittee shall attain clean closure of the Facility by meeting the closure performance standards specified in Permit Section 5 and Section G.8 of this Closure Plan.

G.1.1 Records Review

Prior to implementing closure, a review of the Operating Record shall be performed to identify all wastes managed at the Facility and to identify any spills or releases that occurred at the Facility during its operational history. In addition, a structural assessment shall be performed at all areas where chemicals were managed, including all areas outside of the buildings where wastes were managed, to identify any areas where a release may have occurred and any structural damage or potential lapses of integrity to the waste management unit structures or containment. The structural assessment also shall be used to determine potential sampling locations to evaluate for the presence of hazardous waste or hazardous constituents.

The Permittee shall summarize the results of the records review in the closure report. The Permittee shall update the list of constituents of concern as necessary based on the records review. The Permittee shall amend this Closure Plan to add a Sampling and Analysis Plan (SAP) that includes the proposed locations for sampling, describes the methods and procedures for sample collection and the chemical analytical methods proposed to test for the presence of all constituents of concern managed at the Facility during the operating life of Facility. The SAP shall be prepared in general accordance with Permit Section 7.12.2 (Investigation Work Plan) and be submitted in accordance with the schedule included in Permit Section 5.3.3.

G.2 UNDERGROUND TANKS AND ASSOCIATED PIPING

Closure of the tanks system shall include removal of all waste and waste residue, equipment, structures, and contaminated soils. The following activities shall be performed as part of closure:

- a. Remove all remaining materials from the tanks.
- b. Provide access to the tanks.
- c. Rinse, scrape, and squeegee the tank interiors as practicable to completely remove all residual waste material and rinsate.
- d. Disconnect and decontaminate all ancillary piping and pumping equipment.
- e. Excavate and remove the tanks and remove all affected soils for off-site disposal.
- f. Visually inspect the tanks for evidence of leakage.

- g. Remove all ancillary equipment for disposal.
- i. Collect soil samples from beneath the tanks and underground ancillary equipment for chemical analyses based on the wastes managed in the tank as identified in the records review described in Section G.1.1 above.
- h. Backfill tank excavation with clean fill material after the results of soil sampling demonstrate that all residual contamination at concentrations exceeding residential soil screening levels has been removed.

G.2.1 Removal of Waste Material and Opening of the Tank

The contents of the tank shall be removed using a pump, vacuum or similar equipment and then shipped off site for disposal. The tanks shall be ventilated until the atmosphere in the tanks can be maintained at less than 1% of the lower explosive limit. The underground tanks may be accessed by the manway which shall be opened using nonsparking tools.

Entering the tanks shall be considered confined space entry and shall follow all applicable safety regulations for confined space entry and personal protection related to hazardous waste exposure. The tanks shall then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

G.2.2 Removal of Residual Waste and Cleaning of Tank

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur). Confined space entry requires special procedures. The contractor entering the confined space shall adhere to the applicable regulations for confined space entry and egress (29 CFR 1910.146). Ventilation shall be maintained in the tanks to prevent the possibility of an explosive atmosphere and supplied air shall be provided to all workers. Prior to any person entering the tanks, an effort shall be made to remove as much liquid and sediment as possible. During closure, all piping and ancillary equipment shall be flushed with a detergent solution and triple rinsed. The flushing shall begin at or near the piping origination, from the return and fill station toward the tanks.

The tanks shall be decontaminated using a high-pressure wash with a detergent solution and a triple rinse to wash residual material from the walls, roof, and floor of the tanks. The wash water shall be removed and containerized. The residual waste and wash water shall be managed as hazardous waste, sampled and analyzed for the constituents identified as having been managed in the tanks in the records review, and shipped to a recycling center or permitted disposal facility. Decontamination procedures shall be monitored prior to removing the tanks to verify appropriate tank atmospheric conditions exist allowing the tanks to be safely removed and demolished in accordance with applicable regulations.

G.2.3 Removal of the Tanks

Following removal of residual wastes and decontamination activities, the tanks system will be excavated and removed. To safely remove the tank, the following procedures will be used:

- a. Disconnect ancillary piping and equipment.
- b. Disconnect connected pumping equipment.
- c. Remove the pavement, soils and fill overlying the tanks and piping. Excavated overburden may be stockpiled on-site and tested for reuse as backfill, if the materials meet residential cleanup levels for the constituents of concern. Alternatively, excavated soil may also be tested for the presence of hazardous constituents of concern and subsequently shipped off-site for disposal at an appropriate permitted disposal facility. Characterization for disposal shall include a hazardous waste determination and also shall meet the acceptance criteria of the receiving disposal facility. The tanks and piping shall be cleaned, removed, cut up and transported to an appropriate facility for disposal or recycling. Verification of destruction shall be provided by the contractor or scrap metal facility.
- d. Evaluation for the presence of contamination shall be conducted in accordance with the methods and procedures for soil sampling and analysis included in Permit Section 7.10. Four soil samples shall be collected from the base of the tank excavation and two samples shall be obtained from each excavation side wall approximately four feet above the base of the tank excavation. Soil samples also shall be collected from beneath all ancillary equipment, including at ten-foot intervals beneath the piping and at any location within the excavation where field screening evidence indicates the presence of contamination. The samples shall be obtained from the native soils after the tank and pipeline backfill has been removed. The soil samples shall be submitted to an off-site chemical analytical laboratory for analysis for the waste constituents identified in the records review conducted in accordance with Section G.1.1 above. If constituents are present in soils at the limits of the tank excavation at concentrations greater than residential risk-based standards or screening levels, a workplan must be developed, and submitted to NMED for review and approval, to determine the extent of contamination and the appropriate corrective actions.
- e. Once all residual contamination present at concentrations greater than residential cleanup levels has been removed from the excavations, backfill the excavations with clean fill materials and compact and grade the backfill to ground level.

G.3 STRUCTURAL ASSESSMENT

The structural assessment is a visual inspection and evaluation of the facility's physical condition, with the intent of identifying areas of contamination or potential contamination and areas where conditions may create a pathway for contaminant migration. The Permittee shall conduct a structural assessment by evaluating all structures at the Facility where chemicals were managed at any time for evidence of a release (*e.g.*, stains) or damage (*e.g.*, cracks, gaps) to the flooring, containment structures, building materials, fixtures, outdoor storage pads, loading docks and driving surfaces. If the structural assessment reveals any evidence of a release or damage, the Permittee shall amend the SAP to add these locations for sampling.

The Permittee shall notify the NMED at least 30 days prior to conducting the assessment to provide the NMED the opportunity to observe the assessment. The structural assessment shall be conducted after all wastes and equipment have been removed from the Facility, such that structural surfaces are visible, and before beginning any closure decontamination procedures. The Permittee shall summarize the results of the records review in the closure report. The Permittee shall amend this Closure Plan as necessary to revise the SAP to include additional sampling locations and the appropriate procedures for sampling and chemical analysis of samples collected at the locations identified in the structural assessment.

G.4 DRUM STORAGE AREAS AND WAREHOUSE

All drums and other waste containers shall be removed and shipped off site to an appropriate permitted facility at closure. The closure procedures shall be conducted in accordance with Permit Section 5, this Permit Attachment (G) and 40 CFR 264 subpart G.

The concrete floors, curbing, spill containment trenches, walls to a height of eight feet and any other exposed surfaces in all areas where chemicals were managed shall be cleaned with a high-pressure spray and detergent solution and triple rinsed to remove hazardous waste and waste residue from the containment system. Large pieces of equipment shall also be decontaminated using the same methods. Small hand tools shall be decontaminated utilizing the decontamination procedures for sampling and measuring equipment included in Permit Section 7.10.2.11. Decontamination and verification sampling is not required for the internal components of equipment or structures, if there is no evidence that a release has affected such internal components. Wash water from the decontamination shall be recovered and containerized in a vacuum truck and/or drums and managed as hazardous waste for off-site disposal.

Wipe samples shall be collected following decontamination to verify removal of waste residues and residual contamination from the buildings where chemicals were managed during the operating life of the Facility. Based on the Records Review and Structural Assessment, wipe samples shall be collected from areas where spills were documented and where staining or other evidence of a release is observed prior to cleaning. If no areas where potential residual contamination due to releases are identified by the records review and structural assessment, a

minimum of one wipe sample for every 400 square feet shall be collected from the loading areas, aisles where containers were routinely transported, and at the return/fill station. The wipe sample locations shall be proposed in the amended SAP.

All wipe samples shall be collected in accordance with USACHPPM Technical Guide 312 June 2009, NIOSH Method 7702 (XRF analysis for lead only), NIOSH 9100 (Swipe sampling for lead only) and the Brookhaven National Laboratory SOP IH 75190 Swipe Sampling Procedures, as applicable, using laboratory-supplied wipe sampling kits that contain the solvent(s) appropriate for the constituents of concern. Wipe samples shall be analyzed for VOCs, SVOCs, metals and any other identified constituent of concern (e.g., PCBs, pesticides). The wipe sampling methods and procedures shall be proposed in the amended SAP.

Following decontamination, the concrete floor, curbing, and containment trenches shall be inspected by an independent New Mexico registered Professional Engineer. If any lapses of integrity are found (e.g., through-going or unsealed cracks), soil samples must be collected from beneath the cracks. The sampling shall be conducted in accordance with the methods and procedures included in Permit Section 7.10. If constituents are present above residential risk-based levels, a workplan must be developed, and submitted to NMED for review approval, to determine the extent of contamination and the appropriate remedial action. The concrete floor, curbing, and trenches will remain following decontamination unless the remedial action requires removal of all or portions of the structures.

G.5 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used solvents to the waste storage tank. At closure, the sediment in the dumpsters/drum washer shall be removed, containerized, and subsequently shipped to an appropriate permitted facility for disposal. The wastes removed from the dumpsters/drum washer shall be managed as hazardous waste.

Prior to cleaning and removal of the underground storage tanks, the dumpster/drum washers and the dock area shall be thoroughly washed with a detergent solution and high-pressure spray, then triple rinsed to remove hazardous waste and waste residues. The rinsate may either be collected in a vac truck and placed in containers or be discharged through the appurtenant piping system into the storage tank, prior to closure. The rinsate shall be managed as hazardous waste.

A sample of the final rinsate shall be collected from each of the units. The rinsate samples shall be submitted to a chemical analytical laboratory for analysis for volatile organic compounds, target analyte list metals and any other constituents identified in the records review. If constituents are detected at levels above NMED tap water screening levels as listed in Table A-1 of the NMED Risk Assessment Guidance for Site Investigation and Remediation (2017, as updated), the respective units shall be re-cleaned and the final rinsate retested. Should the components of the return/fill station be managed as scrap metal, a certificate of destruction must be provided by the contractor or scrap metal facility.

Following decontamination and removal of the return/fill station, the underlying concrete slab shall be inspected by a New Mexico registered professional engineer for potential lapses of integrity. If lapses of integrity are found during the inspection (e.g., through-going or unsealed cracks) that may have allowed potential migration of wastes outside the containment area, soil samples shall be collected from immediately beneath the cracked areas as described in Section G.4 above. If constituents are present above residential risk-based levels, a workplan must be developed, and submitted to NMED for review approval, to determine the extent of contamination and the appropriate remedial action. The concrete floor and ancillary building structures will remain following decontamination unless the remedial action requires removal of all or portions of the structures.

G.6 FLAMMABLE STORAGE BUILDING

The flammable storage building is used to temporarily store containers of paint waste, dumpster sediment, used solvent, and other flammable materials and/or products. At closure, all residual waste shall be managed as hazardous waste and shall be removed from the building and shipped to an appropriate permitted facility for treatment and/or disposal. The entire building, including the concrete floor, walls to a height of 8 feet, curbing, and containment trenches shall be thoroughly cleaned with a detergent solution and high pressure spray, then triple rinsed to remove hazardous waste and residues from the containment structure. The rinsate shall be collected and managed as a hazardous waste. Wipe samples shall be collected following decontamination to verify removal of waste residues and residual contamination from the building where chemicals were managed during the operating life of the Facility. Based on the Records Review and Structural Assessment, wipe samples shall be collected from areas where spills were documented and where staining or other evidence of a release is observed prior to cleaning. If no areas potential residual contamination due to releases are identified by the records review and structural assessment, one wipe sample per every 400 square feet shall be collected from the areas where waste was routinely transferred, and all loading areas and aisles where containers were routinely transported. The wipe sample locations and chemical analytical methods shall be proposed in the amended SAP.

G.7 LOADING DOCK SOIL SAMPLING

Soil samples shall be collected at closure in the vicinity of the loading docks to evaluate for the presence of contamination. The SAP shall be updated based on the records review and structural assessment to target areas where there is damage to the pavement or concrete or evidence (e.g., staining) or a record of a release. At a minimum, three samples shall be collected in front of each loading dock from the native soils directly underlying the subgrade beneath the concrete or pavement. The soil sampling shall be conducted in accordance with the methods and procedures included in Permit Section 7.10. The soil samples shall be submitted to a chemical analytical laboratory for analysis for all constituents historically managed at the Facility. If constituents are present above residential risk-based levels, a workplan must be developed, and submitted to

NMED for review approval, to determine the extent of contamination and the appropriate remedial action.

G.8 CLOSURE REPORT

The closure activities and results of sampling and analysis and any corrective actions shall be summarized in a Closure Report submitted to NMED for review and approval within 60 days of the completion of closure. The report shall be prepared in general accordance with the reporting requirements included in Permit Section 7.12.3 (Investigation Report). Residual hazardous constituent concentrations detected in soil samples must meet residential risk levels in accordance with Permit Section 7.4. A certification of closure signed by the owner and a qualified independent professional engineer, registered in the State of New Mexico, shall be submitted within 60 days of the completion of closure in accordance with 40 CFR § 264.115.

PERMIT ATTACHMENT H POST-CLOSURE CARE PLAN

(Reserved)

PERMIT ATTACHMENT I COMPLIANCE SCHEDULE
(Reserved)

PERMIT ATTACHMENT J HAZARDOUS WASTE MANAGEMENT UNITS

J.1 ACTIVE PORTION OF THE CONTAINER AND TANK STORAGE FACILITY

The active portion of the facility comprises those units permitted for storage of hazardous waste. These units are listed below in Table J-1.1.

The following Table provides information on storage capacities of the units that compose the Facility, process codes of the waste types, and associated descriptions:

- S01-Storage in Containers (Table J-1.1)
- SO2-Storage in Tanks (Table J-1.1)

| TABLE J-1.1. | | | |
|--|-------------------------|---|---------------------|
| Hazardous Waste Storage in Containers (S0₁) and Tanks (SO₂) | | | |
| Unit Identifier | Storage Capacity | General Information | Type of Unit |
| <i>1. Hazardous Waste Storage in Containers (Process Code S0₁)</i> | | | |
| East Container Storage Unit | 2,680 gallons | Accepts waste from off-site generators. Manages and stores hazardous waste in drums. <u>Total square footage: 548</u> | Indoor |
| West Container Storage Unit | 4,310 gallons | Accepts waste from off-site generators. Conducts hazardous waste management and storage in drums. <u>Total square footage: 914</u> | Indoor |
| Flammable Storage Building | 9,650 gallons | Accepts flammable hazardous waste from off-site generators. Manages and stores hazardous waste in drums. <u>Total square footage: 1464</u> | Indoor |
| <i>2. Hazardous Waste Storage in Tanks (Process Code SO₂)</i> | | | |
| Underground Storage Tank Unit | 12,000 gallons | Accepts waste from off-site generators. Manages and stores hazardous waste in one Underground Storage Tank. <u>Total square footage: 141</u> | Indoor |

PERMIT ATTACHMENT K

**SOLID WASTE MANAGEMENT UNITS AND AREAS
OF CONCERN**

RESERVED

PERMIT ATTACHMENT L FIGURES

L.1 FIGURES

- Figure 1:** Regional Map of Albuquerque showing the Facility's location in Bernalillo County, New Mexico

- Figure 2:** Facility Plan showing Hazardous Waste Management Units/Areas

- Figure 3:** Topographic Map of the Container and Tank Storage Facility

- Figure 4:** Wind Rose Map for Albuquerque

- Figure 5:** FEMA 100-Year Flood Map showing location of the Facility

- Figure 6:** Facility Emergency Evacuation Plan

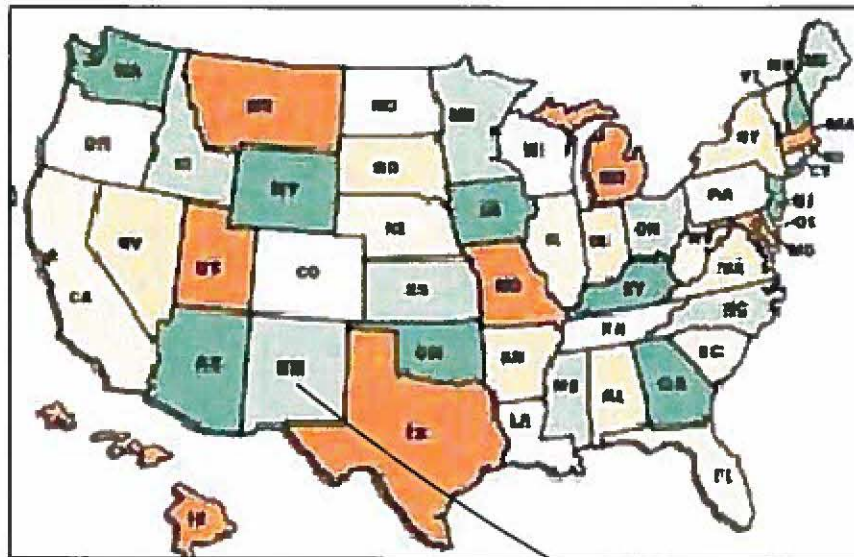


Figure 1: Regional Map of Albuquerque showing the Facility's location in Bernalillo County, New Mexico

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2500 N. CENT. EXPRESSWAY STE 400 RICHARDSON, TX. 75080
PHONE 800-689-5740

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| SCALE | NONE | BY | CHKD | APPR | OP | APPR | DATE |
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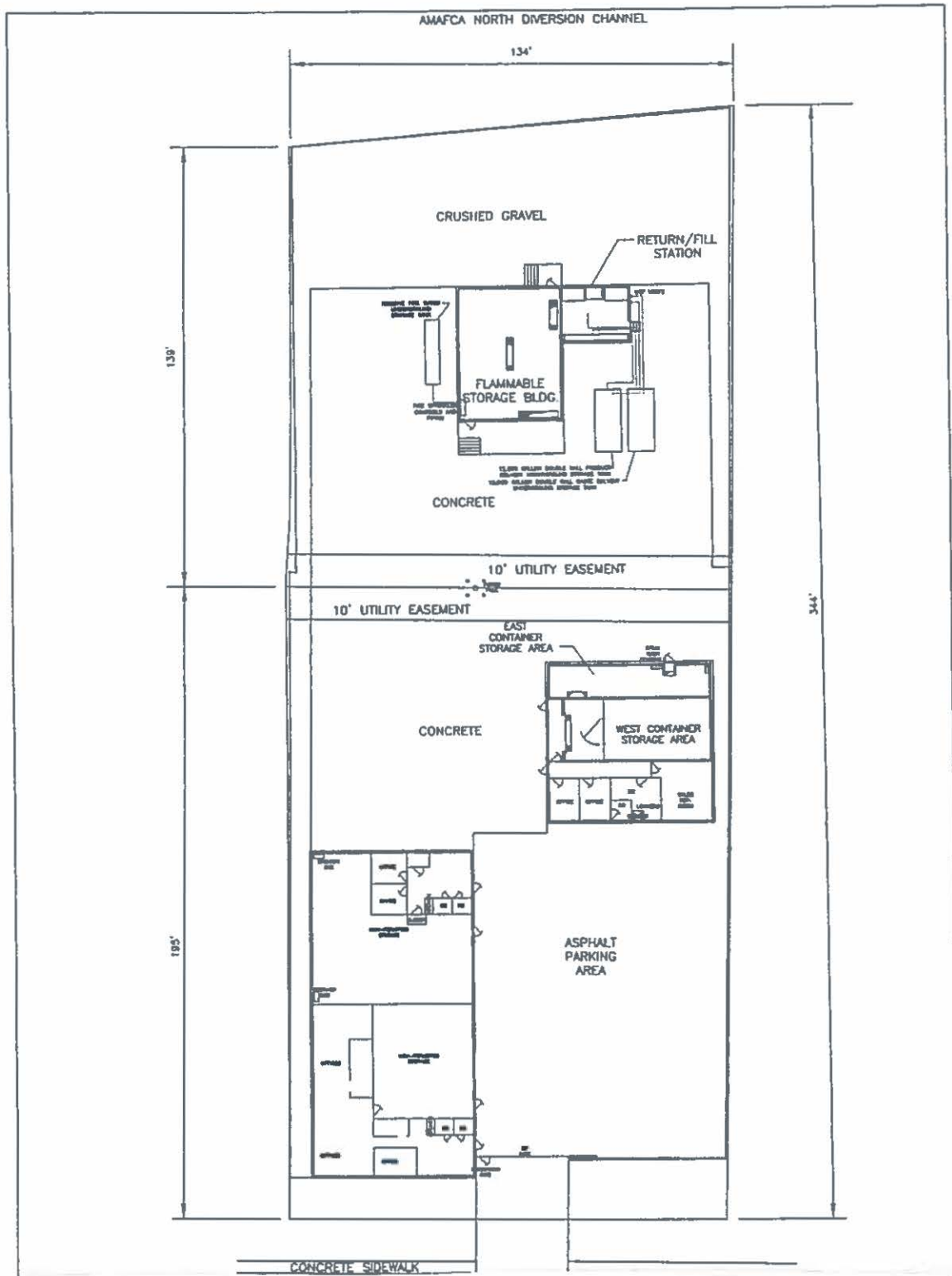


Figure 2: Facility Plan showing Hazardous Waste Management Units/Areas

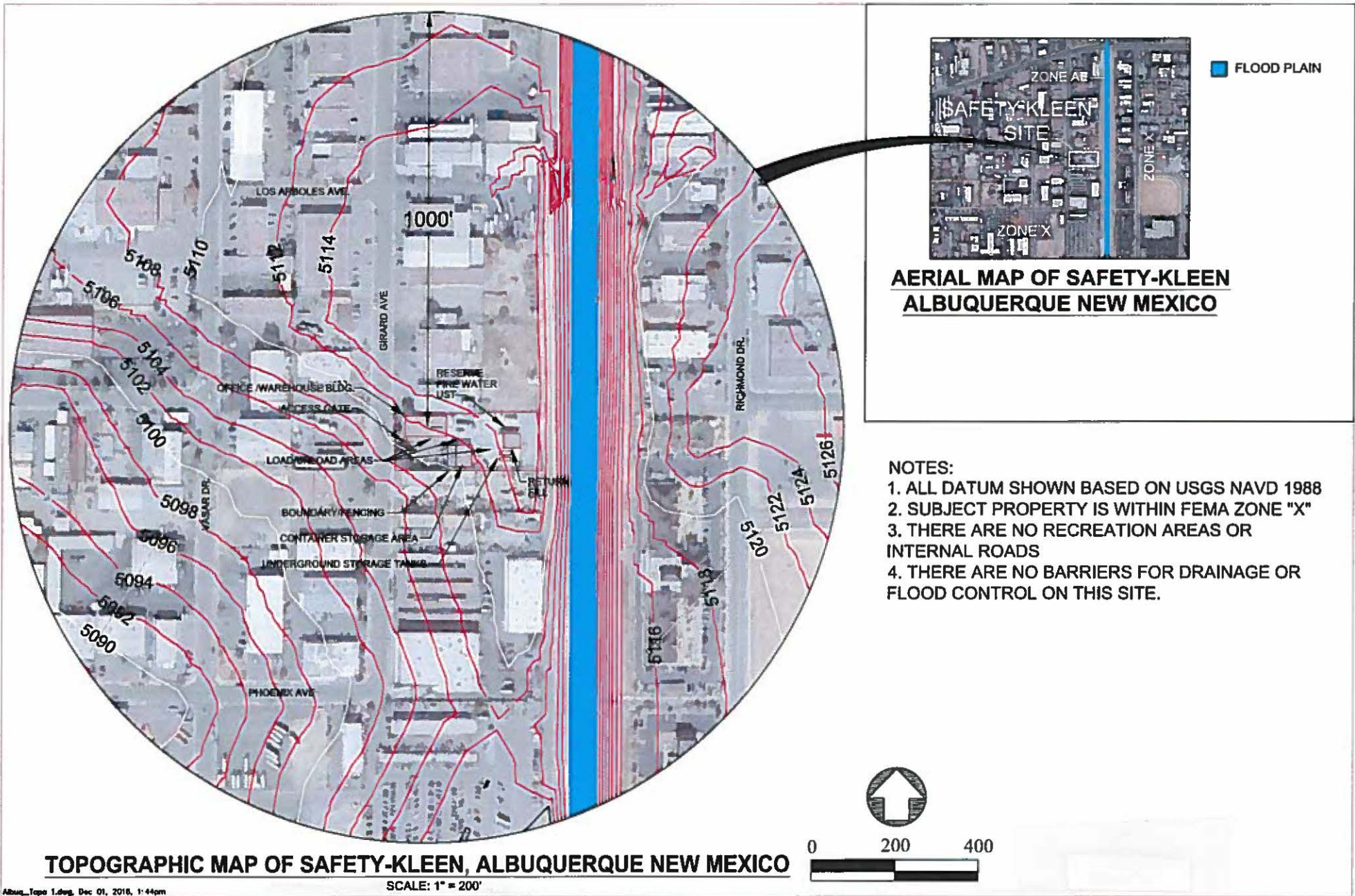


Figure 3: Topographic Map of the Container and Tank Storage Facility

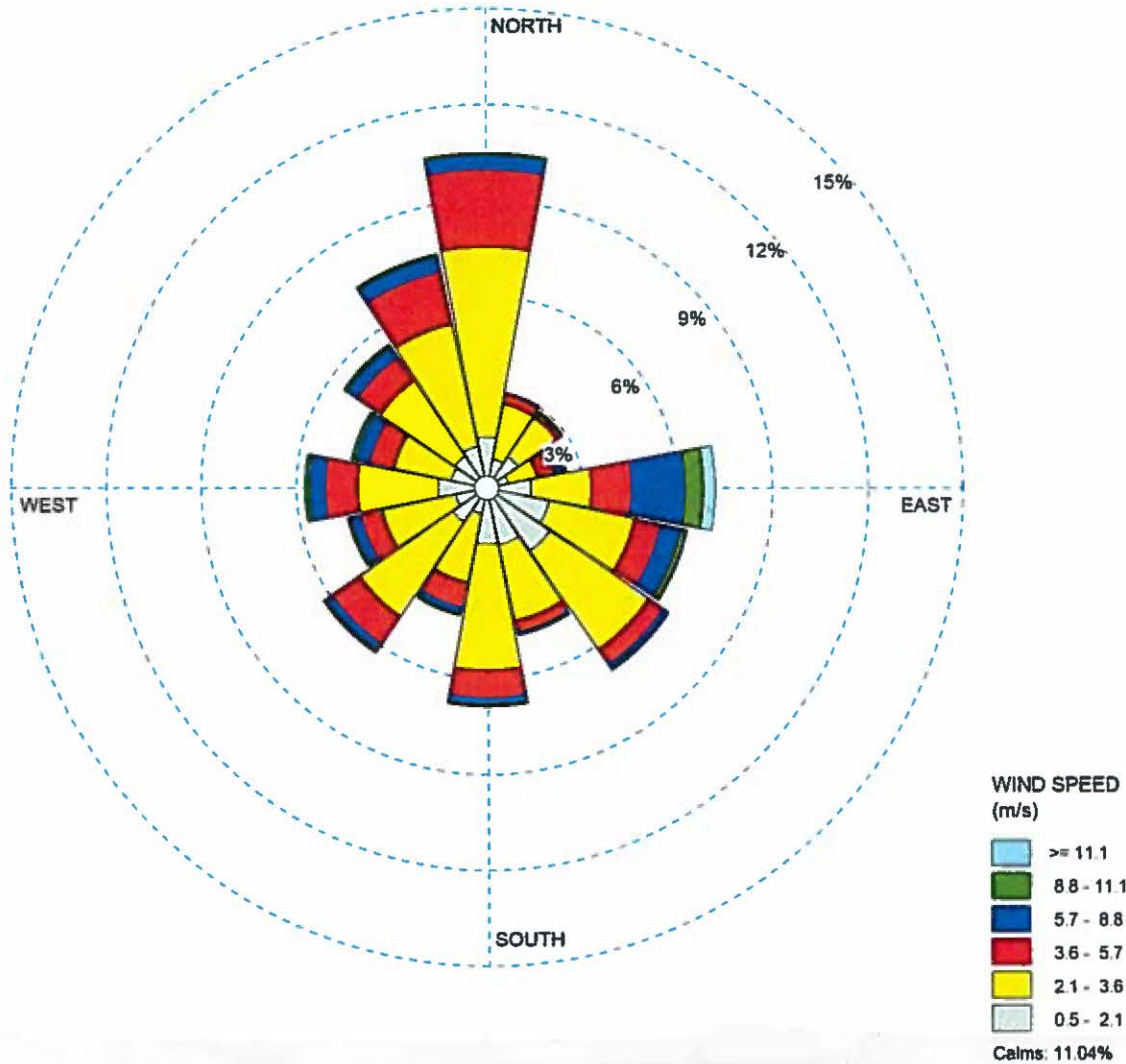
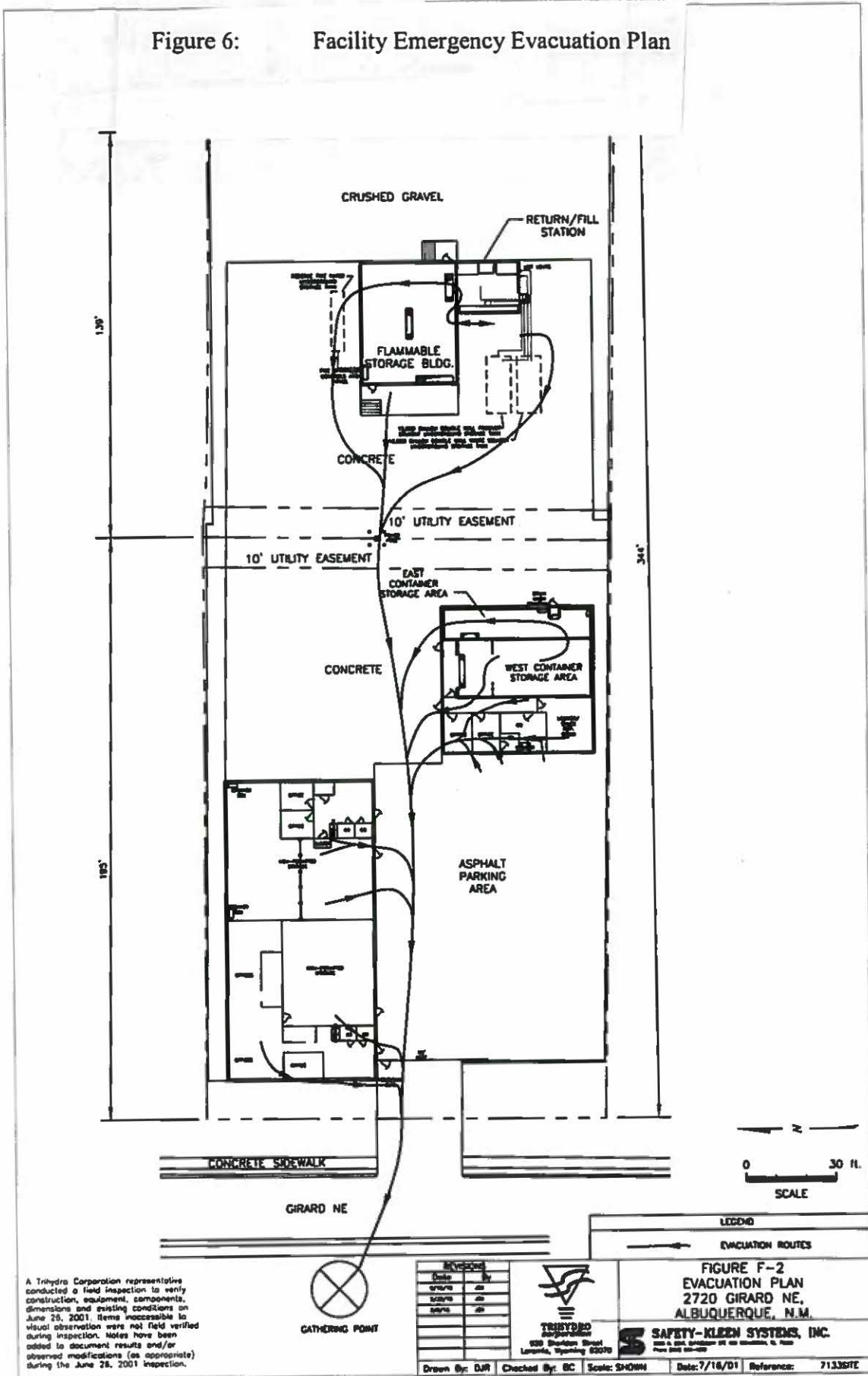


Figure 4: Wind Rose Map for Albuquerque

| | | | |
|-----------------------|--|----------------------------|-----------------------|
| JEK DRAFTING & DESIGN | DATA PERIOD: | COMPANY NAME: | |
| | Start Date: 1/1/1992 - 00:00 End Date: 12/31/1992 - 23:00 | SAFETY-KLEEN SYSTEMS, INC. | |
| | CALM WINDS: | MODELER: | |
| | 11.04% | TOTAL COUNT: | |
| | | 8784 hrs. | |
| | AVG WIND SPEED: | DATE 5/26/15 | DWG NO. 7133-SP00-049 |
| | 2.67 m/s | 5/27/2015 | |

Figure 6: Facility Emergency Evacuation Plan



A Trihydro Corporation representative conducted a field inspection to verify construction, equipment, dimensions, dimensions and existing conditions on June 26, 2001. Items inaccessible to visual observation were not field verified during inspection. Notes have been added to document results and/or observed modifications (as appropriate) during the June 26, 2001 inspection.

| EVIDENCE | |
|----------|----|
| DATE | BY |
| | |
| | |
| | |
| | |
| | |



LECDID

EVACUATION ROUTES

**FIGURE F-2
EVACUATION PLAN
2720 GIRARD NE,
ALBUQUERQUE, N.M.**

SAFETY-KLEEN SYSTEMS, INC.
200 N. 2ND, SUITE 200 ALBUQUERQUE, N.M.
Phone 505 261-4000

Drawn By: DJR Checked By: BC Scale: SHOWN Date: 7/16/01 Reference: 7133BTE