

ATTACHMENTS

PERMIT ATTACHMENT A FACILITY DESCRIPTION

A.1 INTRODUCTION

This Permit Attachment contains general information pertaining to Safety-Kleen Systems, Inc. Farmington Center (SKAL; the Facility) and the management of hazardous waste Container and Tank storage areas covered by this Permit. The Facility is owned by J.D. Kinsey and Joy M. Kinsey, and is operated by Safety-Kleen Systems, Inc. Henceforth, the Owner and Operator will collectively be addressed as the Permittees.

Safety-Kleen Systems, Inc. is a permitted hazardous waste storage Facility, a large quantity generator, handler, and transporter of hazardous waste, universal waste, and used oil.

A.2 DESCRIPTION OF THE FACILITY

The Farmington hazardous waste Container and Tank storage facility is located at 4210 A Hawkins Road in the City of Farmington, San Juan County, New Mexico. The Facility has been operating as a storage facility since January 1981. The location of the Facility is shown on Figure 1 and Figure 2 in Permit Attachment L a.

The hazardous waste management units are shown on the Site Plan on Figure 3, Permit Attachment L. The Facility consists of the following four structures:

- a. A 1,530-square foot warehouse with offices and a container storage area;
- b. Two 12,600-gallon aboveground storage tanks, with diking, used for storage of product and used solvents;
- c. One solvent Return and Fill station with a loading dock, wet dumpster, drum washer, a secondary containment; and
- d. Two 24,500-gallon, and 21,000-gallon aboveground storage tanks, with diking used for storage of used oil and antifreeze.

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, or to a permitted facility for disposal. There is no onsite hazardous waste treatment or disposal.

A.3 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Systems, Inc. is a industrial solvent supply and waste recycling company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. The company has been offering solvent collection and reclamation services for its customers since 1968.

These wastes are transported from the permitted Facility to one of the Safety-Kleen recycling centers or to an independent permitted disposal facility. All other waste streams are handled on a 10-day transfer basis. 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 used material, with clean (most often recycled) product. The spent material is then transported back to the service center.

At the end of each day, the solvent is transferred from the 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 for transport 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 Facility where it is stored in a contained area of the warehouse.

A.4 REGIONAL DESCRIPTION OF THE FACILITY

The Farmington New Mexico Service Center is located in San Juan County about 600 feet northeast of the intersection of Troy King Road and West Main Street (U.S. Hwy 550). This area is zoned industrial, and to the best of Safety-Kleen's knowledge, no easements, title, deed, or usage restrictions exist which may conflict with operations at this site.

A.4.1 Climate at the Facility

The City of Farmington is located in an arid, continental climate zone. Rainfall varies but in the vicinity of the service center, the average annual precipitation is 6 inches. The average annual snowfall is 9 inches. The average temperature in winter is 44°F and the average summer temperature is 71°F. Prevailing winds are east-west. Figure 4 depicts the Farmington wind rose, which indicates the prevailing wind-speed and direction.

There are no known oil or gas wells within a mile of the Container and Tank Storage Facility. No parks, schools, wetlands, or critical habitats exist within one mile of the Facility.

A.4.2 Floodplain Considerations

The Facility is not located in a 100-year flood plain area and is not subject to other flooding factors. Therefore, there are no barriers or provisions for drainage or flood control. A FEMA 100-Year Flood Plain Map is included as Figure 5 in Permit Attachment.

A.4.3 Traffic Patterns

The non-building areas of the facility are paved with asphalt, concrete or gravel, as noted on the Site Plan in Figure 3, Permit Attachment L (*Figures*). Most of the vehicular traffic and loading/unloading operations occur at and near the Return and Fill station, which is paved with asphalt and concrete. Primary access to the facility is from Hwy 64 (West Main) to Troy King Road to Hawkins Road, or Pinon Hills Boulevard to Troy King Road. The entrance to the facility is on Hawkins Road which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The route truck that daily travels the routes between the Facility and its customers uses the two-lane approach driveway. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area.

The facility's hazardous waste collection and delivery vehicles 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.

Waste containers shall be 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. Bulk tractor/tankers are dispatched from a Recycle Center approximately every 60-90 working days to deliver the clean solvent and pick up used bulk solvent. These transfer activities are conducted at the aboveground tank storage area. 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 Hawkins Road.

A.4.4 Surrounding Land Use

The Facility is situated in an industrial zone of the City of Farmington and is surrounded by “4 Rivers Equipment” on the north, US Hwy-64 on the south, Wagner Caterpillar Equipment” on the west, and “MBA Training” on the east.

A.5 STORAGE OF HAZARDOUS WASTE IN CONTAINERS

A.5.1 Drum Storage

The slab, curbing and collection trenches for the Container Storage Area in the warehouse are made of steel-reinforced concrete and the concrete has been poured so that no cracks or gaps exist. The curbing is four inches high and six inches wide and encompasses the storage area except where there is a trench. The container storage area has secondary containment in the form of a six-inch wide by four-inch high steel reinforced concrete curb with a 12' x 1.7' x 2.5' (382 gallons) collection trench. No more than 3,820 gallons of waste materials shall be stored in the drum storage area at any time. Steel grates cover the trench to facilitate the movement of containers across it. The trench is designed only to capture any released material; there is no discharge outlet or pump.

The concrete on the floor and curbing is coated with a chemical-resistant epoxy and urethane, or equivalent, to be impermeable to contain leaks and spills. The materials 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. Ignitable wastes are stored in the container storage area that is at least 50 feet from the Facility property line.

The storage areas and containment systems are inspected each operating day. All accumulated liquids shall be identified and removed within 24 hours of detection to prevent overflow. The wastes stored in the Container Storage Area are compatible with the containers in which they are stored. The containers used to store hazardous waste shall meet DOT requirements. All containers shall be 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 shall be placed in a DOT-approved salvage container. Due to the size of containers stored in the Container Storage Area, absorbents such as socks or pads shall be used to clean up the spill. This waste shall be placed into the salvage drum (along with the original shipping container) and shipped to a permitted facility off-site for disposal.

A.5.2 Waste Management Practices

The Farmington Service Center was designed to facilitate the management and storage of the hazardous wastes resulting from the services offered by Safety-Kleen. The aboveground storage tanks, drum storage area, and Return and Fill station have secondary containment and the Facility has the equipment necessary for employees to safely manage wastes on-site.

A.5.3 Bulk Solvent Management

Used solvent from parts washers is accumulated in a 12,600-gallon aboveground storage tank via the Return and Fill station. Used material in containers meeting DOT specifications shall be poured into the dumpsters in the Return and Fill station and the material in the dumpster pumped into the used solvent storage tank. The Return and Fill station has secondary containment in the form of a 17'6" x 11'2" (730 gallons) concrete slab with curbing. The total volume of waste and product shall not exceed ten times the secondary containment volume.

The sediment which accumulates in the bottom of the drum washer/dumpster shall be removed manually, drummed and stored in the Return and Fill station in accordance with the satellite accumulation requirements of 40 CFR 262.34(b). The drummed sediment shall be manifested for transport off-site prior to the expiration of the 90-day time frame for accumulation of hazardous waste.

A.6 CONTAINER (DRUM MANAGEMENT)

Proper handling of hazardous waste shall be ensured through proper training of personnel. 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 of waste will be moved with a forklift, pallet jack, or drum dolly.

Drums of waste that will be emptied into the used solvent tank shall be delivered to an overhead door of the Return and Fill building. The building has an elevated dock (grating). Waste containers that will be placed into storage into this area shall be removed from the route truck via a hydraulic platform lift gate that is on each route truck. The employees 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 grade level. The drums shall be 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.

The Container Storage Area in the warehouse is used for the storage of, 1) spent immersion cleaner, 2) dry cleaning wastes, 3) paint waste, 4) photo imaging waste, and 5) aqueous parts washer solvent. Non-hazardous products and Facility products may also be stored in this area. The wastes in the container storage area shall not be opened (except for sampling purposes) or mixed/comingled while on site and shall be segregated in properly labeled containers to indicate their contents. Incompatible wastes or materials shall not be stored in the Container Storage

portion of the warehouse. All containers shall be stored on pallets. Ignitable or flammable waste containers shall be stored at least 50 feet from the facility property line.

The container storage area has secondary containment in the form of a six-inch wide by four-inch high steel reinforced concrete curb with a 12 feet x 1.7 feet x 2.5 feet (382 gallons) collection trench. No more than 3,820 gallons of waste may be stored in the drum storage area at any time. An aerial photograph of the Facility is included as Appendix A-1.

Adequate aisle space (a minimum of two and a half feet wide) is maintained in the Container Storage Area. The two and a half-foot aisle space is wide enough for the unobstructed movement of personnel, medical and fire protection equipment, spill control equipment, and decontamination equipment, in case of emergency.” Containers in the drum storage areas are placed on pallets and moved with a forklift or pallet jack when feasible. If containers of 15 gallons or larger are stacked, a pallet shall separate the layers. The maximum number of containers stored per pallet layer is: twelve-5-gallon containers; nine 15-gallon containers, five 30-gallon containers, and four 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 7 feet.

A.6.1 Description of Containers

Safety-Kleen shall 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 shall store and transport any incompatible wastes in accordance with 49 CFR 177.848 (segregation of hazardous materials).

Containers stored at the Facility range from 5-gallon capacity to 55-gallon capacity. The Facility provides DOT approved hazardous waste containers to the waste generators, although the generators may package wastes in containers not provided by Safety-Kleen. These containers shall be inspected prior to pickup to ensure proper DOT rating. The contents of each hazardous waste container shall be verified by the 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 is inspected for leakage before filling/refilling and shipment.

Except for used parts washer solvent drums, hazardous waste drums managed at the facility shall not be opened unless for sampling purposes. Containers shall be handled to prevent rupture or leaking. Proper handling of hazardous waste is ensured through proper training of facility personnel. Employees shall be trained on hazardous waste 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 inspect each waste drum prior to transporting 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 will be placed into an appropriate overpack salvage container. The overpack container

shall be properly labeled, and the entire packaging will be transported offsite as per normal waste management protocols.

A.6.2 Management of Incompatible Wastes in Containers

The only waste containers routinely opened at the facility are the petroleum-based solvent waste containers. The spent solvent waste from these containers is bulked into an aboveground storage tank and the containers are cleaned for reuse. The waste codes and volumes for this solvent are referenced in Permit Attachment C (Waste Analysis Plan). The remaining containers of wastes shall not be opened at the facility except for the purpose of sample collection.

The only containers that may be reused at the facility are drums containing used parts washer solvent. These drums shall be emptied and washed with same solvent in a drum washer and prior to being refilled with clean solvent for delivery to customers. All materials used in the this shall be compatible.

A.7 PREVENTING RUNOFF FROM HAZARDOUS WASTE HANDLING AREAS

Containers of waste are off-loaded from route trucks into the enclosed storage area. The containers are stored in an enclosed warehouse, and not subject to run on or run off. Drums of used mineral spirits solvent are emptied into the Return and Fill Station, which shall be 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 an enclosed storage area and the transfer of parts washer solvent to the bulk storage tank is conducted over secondary containment. Bulk aboveground 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

Should a power failure occur, all activities requiring electricity shall cease. 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 will not be operable during a power outage. The transfer pumps used to pump clean solvent into the storage tank 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 hazardous waste or product/material from the tank.

A.10 PREVENTING UNDUE EXPOSURE OF FACILITY PERSONNEL

All Safety-Kleen employees shall receive 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 near the office area that can be used to decontaminate in the event of accidental contact with contaminants.

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

Employees must perform their duties in the safest manner. Drums of product or waste shall be moved using a handcart or placed on pallets and moved using a forklift or pallet jack. Upon arrival at the Facility, containers of used solvent shall be added to the storage tank or placed in the drum storage area with 24 hours of arrival. Open containers of solvent must not be left unattended. Below are descriptions of situations which can 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 pollution incident (i.e., one that can be remediated without assistance from a clean-up contractor):

- 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 containers are poured into the drum washer dumpster, waste could splash out. The Return and Fill station is underlain by concrete secondary containment with a sump. This design will contain this type of spill.
- b. **Filling of Drums with Solvent Product:** A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with parts washer solvent. Leaking fittings, a damaged hose or carelessness could lead to spilling the solvent. Manual emergency shut-off valves are on each hose, should the equipment not function properly. In addition, the personnel training program emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.
- c. **Moving Containers:** When a container of hazardous waste is being moved, a potential exists for it to tip over. To minimize the potential for spillage of waste, 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 secondary containment. If material is spilled, other containers will not be in contact with the spilled material or waste because they are situated on pallets.

- 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 shall be made using a handcart and a lift gate, if necessary.

If a spill does occur, the waste shall be immediately removed with absorbents (i.e. sorbent clay or pads) or other appropriate equipment. Any contaminated soil that results from a spill shall be removed manually, drummed, and shipped to a permitted facility for proper disposal facility. If soils are contaminated, cleanup shall be verified by confirmation sampling collected in accordance with the procedures described in Permit Section 7.

A.11.2 Potential Major Spill Source

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

- a. **Overfilling of Storage Tanks:** Both product and used solvent tanks can be overfilled resulting in a discharge of the solvent. A high-level alarm and daily checks of tank volumes monitor for this potential occurrence.
- b. **Leaking Pipelines:** The pipelines to the storage tanks present a potential for leaks. Regular inspection of this equipment and the solvent inventory will 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. The facility shall store and transport any incompatible wastes in accordance with the requirements specified at 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 container in which they were originally packaged until received at a properly permitted facility.

The following is a list of fire prevention and minimization measures:

- a. All wastes and products shall be kept away from ignitable sources. Personnel must confine smoking and open flames to remote areas, at least 50 feet distant from any solvent. The solvent handling area and the aboveground storage tanks shall be separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.
- b. 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 hazardous waste and other wastes shall be stored in a tank or in containers, which shall not 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. The vapor pressure of the Facility solvents is low (2 mm) and it is only reactive with strong oxidizers. Strong oxidizers are not stored at this facility and the solvent vaporization will be minimal under normal working conditions.
 - Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion.
 - Damage the structural integrity of storage containers, tanks, 5or the Facility.
- c. Adequate aisle space 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.
- d. “No Smoking” signs shall be posted in areas where solvents are handled or stored.
- e. Fire extinguishers shall be checked once a week by Facility personnel and shall be tested by the fire extinguisher company once per year. Fire extinguishers shall be placed at several locations throughout the facility.
- f. 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.

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 ABOVEGROUND TANKS

A.12.1 Tank Storage

The nominal 12,600-gallon aboveground hazardous waste storage tank is 10 feet 6 inches in diameter and 19 feet high. It is constructed of 3/16-inch thick (1/4-inch thick in the lower third of the tank) carbon steel painted white to reflect sunlight. The tanks are constructed in accordance

with Underwriter's Laboratories Standard 142 and they are located more than 15 feet from property line, in accordance with National Fire Protection buffer zone requirements.

The used and product parts washer solvent tanks are equipped with an audio (siren) and visual (strobe light) high-level alarm system which will alert employees when the tank is approximately 600 gallons (or is at 95% capacity) from being full. The two 20,000-gallon used oil and used antifreeze tanks are of similar construction.

The drum washer is tight-piped to the tank with welded joints and all piping is above ground. 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 unit. The tank system and all components are compatible with the petroleum naphtha solvent (product and used) managed in the system.

Integrity Assessments of the spent solvent tank are required as determined by the Steel Tank Institute STI SP001 Standard (Standard for the Inspection of Aboveground Storage Tanks). Since this is a Category 1 shop fabricated tank, the standard requirement is for the facility to conduct formal external inspections at 20-year intervals. The integrity assessment of the spent solvent above ground storage tank was last conducted on February 2, 2006. The next assessment is due in 2026.

A.12.2 Tank Evaluation and Repair Plan

The product and used solvents, used oil, and used antifreeze stored in the tanks at this facility are compatible with the carbon steel structure. If, during the daily inspection, corrosion is noted on any part of the tank systems, it shall be removed from service and be repaired. If the corrosion is significant and localized, the tank will immediately be taken out of service and repaired, (e.g., a patch welded over the corroded area). Should the corrosion of the vessel be extensive or if the tank is found to be leaking, the vessel shall be taken out of service and replaced immediately. In the case of a tank which leaks outside of the dike, the facility's Contingency Plan will be implemented as necessary. Any extensive repairs to the tank system shall be assessed and certified by an independent mechanical engineer before the system is returned to use.

A.12.2.1 External Factors

The storage tanks are accessible only to Facility personnel and the main power switches are located inside the secured fenced area. The Container Storage Area is also in a building, which is accessible only to Safety-Kleen personnel. The following are the external factors that could cause a hazardous waste spill at the Facility:

- a. Vandalism: Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan in Permit Attachment D.
- b. Lightning Strikes: A strike would not result in a solvent spill or fire.

- c. **Power Failure:** A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity shall cease (i.e., pumps will be turned off).
- d. **Flooding:** The site elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility. A flood plain map is shown in Figure 5, Permit Attachment L (Figures).
- e. **Storms or Cold Weather:** The Facility is constructed to withstand storm, snow, or other precipitation events.

A.12.3 Description of Feed Systems

Used parts washer solvent is returned to the facility in containers that can range in size from five to 55 gallons. Once at the branch, the transport vehicle will back up to the Return and Fill building unloading dock. The Return and Fill station is a concrete block structure with a metal roof and has secondary containment in the form of a 17 feet 6 inches x 11 feet 2 inches concrete slab with a 6-inch high curb (730 gallons capacity). The secondary containment is monolithically poured concrete. The concrete is coated with an epoxy so as to be impermeable to contain leaks and spills. The truck staging area in front of the Return and Fill station is concrete and will contain any leaks that may occur in this area. The secondary containment will prevent migration of spills, leaks, or precipitation into or out from the Return and Fill 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 the drum. The drum washer consists of a vat with a capacity of approximately 162 gallons. The drum washers are used to remove any solids that may have accumulated on the interior of the container. The drum washer uses 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 the drums. During container processing, the solvent level in the drum washer shall be 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 remove 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 shall be containerized and managed as onsite-generated hazardous waste. Used parts washer solvent stored in the RCRA permitted tank is regularly transported to a Safety-Kleen Center where it shall be 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 an audible (siren) alarm. The Return and Fill

dock is located adjacent to the tank and alarms so the employee emptying drums will be 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 shall be 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 shut off when the solvent reaches a predetermined level in the drums.

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. 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 a 7,000-gallon capacity. The same vehicle transports a load of used solvent. The driver of the transport vehicle conducts product and waste transfer. 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 shall place 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 inlet and outlet. The product tank is equipped with a high-level alarm system; same as the used solvent tank. If the alarm sounds, the driver can immediately shut down transfer operations.

After the driver of the transport vehicle 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 shall be grounded and bonded.

A.12.4 Secondary Containment of Storage Tank

The secondary containment for the aboveground hazardous waste storage tanks consists of a monolithically poured slab and concrete block dike wall with steel reinforced cement. The secondary containment measures 37 feet x 22 feet x 3 feet and has a holding capacity of 18,266 gallons. The slab is 6 inches thick and the walls are 8 inches thick. Two 12,600-gallon tanks are located within the secondary containment; one for spent used parts washer solvents and one for new (product) parts washer solvents.

The secondary containment for the spent used solvent tank has a leak detection system that is designed and operated to detect the failure of the primary containment structure and the presence of any release of hazardous waste or accumulated liquids within 24-hours.

A.12.5 Ignitable, Reactive, and Incompatible Wastes

The facility shall not receive or 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 shall be stored and managed in a manner that it is protected from any material or conditions that may cause the waste to ignite. No smoking or hot work (e.g. welding) shall be done near the tank containing ignitable waste.

The only 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 materials or wastes shall not be stored in this tank.

A.12.6 Procedures, Structures, or Equipment used to Prevent Releases to the Atmosphere.

The tank system is equipped with a high-level alarm, which indicates when the tank is 95% full. 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. In order to prevent releases from the hazardous waste storage tank, the tank is equipped with a high-level alarm that is activated by a float. If the level in the tank is 95% of capacity, the float activates a switch that activates both visual and audible alarms. The transfer pump is also disabled when the level of the waste in the tank is 95% of capacity so that the tank will not overflow.

The storage 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.

Except for 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 for signs of deterioration.

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

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 conditions. 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.

A.13.3 Warning Signs

Warning signs stating “Danger-Unauthorized Personnel Keep Out” (or equivalent language) in English, Navajo, and Spanish, which are legible from a distance of 25 feet from the fence are 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 on the loading dock 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 located in the office. Included in these phone numbers is the 24-hour telephone number which can be used to contact Safety-Kleen's environmental response coordinators. The evacuation plan is described in Section D.5, Permit Attachment D (Contingency Plan). The Evacuation plan and a map showing evacuation routes are provided in Figure 6, Permit Attachment L (Figures).

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 Farmington.

A.14. SUBPART CC COMPLIANCE PLAN

The Safety-Kleen Farmington Facility shall control air pollutant emissions from waste management units at this facility pursuant to the requirements of RCRA Subpart CC specified at Permit Part 2, Sections 2.4.9, 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 the 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 10-day 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 containers or tanks at this facility may display an average volatile organic concentration of greater than 500 ppmv 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 generation is the Facility.

A.14.3 Tanks

Hazardous waste is managed in a 12,600-gallon aboveground storage tank (AST). The AST is designed in accordance with UL Standard 142, 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.

The aboveground storage tanks in which used mineral spirits are stored are fixed roof, non-pressurized, quiescent tanks. The used solvent or hazardous waste tanks at the Facility are Level 1 tanks under Subpart CC. The tank design capacity is less than 75 cubic meters or about 19,813 gallons, and the waste in these tanks exhibits a vapor pressure of less than 76.6 kpa (11.1 psi). The actual vapor pressure of the waste managed in tanks is approximately 0.2 psi. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 264.1084(c). Documentation for the basis of this determination is found in the Safety-Kleen Solvents Vapor Pressure Summary, in Table A.2, which is 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 tank 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 must 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-gallon capacity 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 (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.

**TABLE A.1
LEVEL 1 CONTAINERS**

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 include 5-gallon, 15-gallon, 30-gallon, 55-gallon, and 275-gallon containers. These containers must 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 onsite generated hazardous waste shall be visually inspected upon their initial filling and on the schedule specified by Permit Section 2.8, 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. This written plan and schedule to perform the inspections is incorporated in the facility inspection plan by this reference.

An initial visual tank inspection was conducted on August 24, 1992. No defects were noted on the waste solvent tank, which could result in air pollutant emissions. Visual tank inspections shall be conducted on an annual basis.

A.14.4.3 Recordkeeping

The Facility may use knowledge of process 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 ppmv 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 is a summary of the maximum organic vapor pressure of the waste, as determined using knowledge of the waste pursuant to 264.1084(c).

Safety-Kleen Solvents Vapor Pressure Summary (Isoteniscope Method)

TABLE A.2.

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	–	–	–	–

Psia* or Pounds per square inch absolute (psia) is used to make it clear that the pressure is relative to a vacuum rather than the ambient atmospheric pressure.

PERMIT ATTACHMENT B

AUTHORIZED WASTES


B.1 INTRODUCTION

The Permittees are allowed to accept, manage, and store specific D-listed and F-listed liquid hazardous wastes at the Farmington Facility that contain used solvent and parts cleaning residues. The wastes may be managed stored for periods of up to one year.

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

The Part A Permit Application included below lists the wastes that the Permittees are 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).

PART A PERMIT APPLICATION

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
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1. Reason for Submittal (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<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 reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input checked="" type="checkbox"/>	Submitting a new or revised Part A Form

2. Site EPA ID Number

N	M	D	9	8	0	6	9	8	8	4	9
---	---	---	---	---	---	---	---	---	---	---	---

3. Site Name

SAFETY-KLEEN SYSTEMS, INC.

4. Site Location Address

Street Address	4210a HAWKINS ROAD		
City, Town, or Village	FARMINGTON	County	SAN JUAN
State	NM	Country	USA
		Zip Code	87401

5. Site Mailing Address

Same as Location Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

6. Site Land 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
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7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary) 562112	C.
B.	D.

8. Site Contact Information

Same as Location Address

First Name BRIAN		MI	Last Name COCHRAN	
Title Branch Manager				
Street Address				
City, Town, or Village				
State		Country		Zip Code
Email BRIAN.COCHRAN@SAFETY-KLEEN.COM				
Phone 505-386-9666		Ext		Fax 505-327-3023

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

Same as Location Address

Full Name J.D. KINSEY & JOY M. KINSEY REVOCABLE TRUST		Date Became Owner (mm/dd/yyyy) 3/25/1994
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		
Street Address 100 Olde Oak		
City, Town, or Village Georgetown		
State TX		Country USA Zip Code 78633
Email Davekinsey151@gmail.com		
Phone 505-320-0121		Ext Fax
Comments		

B. Name of Site's Legal Operator

Same as Location Address

Full Name SAFETY-KLEEN SYSTEMS, INC.		Date Became Operator (mm/dd/yyyy) 1/1/1981
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		
Street Address 2700 N. CENTRAL EXPRESSWAY, Suite 200		
City, Town, or Village RICHARDSON		
State TX		Country USA Zip Code 75080
Email nick.culian@safety-kleen.com		
Phone 972-265-2000		Ext Fax 505-884-3353
Comments Contact Nick Culian at 530-363-2632 for Compliance Issues		

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

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
<input checked="" type="checkbox"/>	a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
<input type="checkbox"/>	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
<input type="checkbox"/>	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
If "Yes" above, indicate other generator activities in 2 and 3, as applicable.		
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Mixed Waste (hazardous and radioactive) Generator	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	4. Treater, Storer or Disposer of Hazardous Waste—Note: A hazardous waste Part B permit is required for these activities.	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	5. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. Recycler of Hazardous Waste	
	<input type="checkbox"/>	a. Recycler who stores prior to recycling
	<input type="checkbox"/>	b. Recycler who does not store prior to recycling
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	7. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
	<input type="checkbox"/>	b. Smelting, Melting, and Refining Furnace Exemption

B. 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	D002	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	DO40	D041	D042	D043	F002

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes. Please list the waste codes of the State 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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F003	F005					

11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)

A. Other Waste Activities

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input checked="" type="checkbox"/>	a. Transporter
<input checked="" type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

B. Universal Waste Activities

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input type="checkbox"/>	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 checked="" type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input checked="" type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<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

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

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories—If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or univer-
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Withdrawing from 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator.
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14. LQG Consolidation of VSQG Hazardous Waste

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.
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15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. <input type="checkbox"/> Central Accumulation Area (CAA) <input type="checkbox"/> Entire Facility	
B. Expected closure date: _____ mm/dd/yyyy	
C. Requesting new closure date: _____ mm/dd/yyyy	
D. Date closed : _____ mm/dd/yyyy	
<input type="checkbox"/> 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)	
<input type="checkbox"/> 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)	

16. Notification of Hazardous Secondary Material (HSM) Activity

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. 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 260.30, 40 CFR 261.4(a)(23), (24), or (27)? If “Yes”, you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Are you notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate? If “Yes”, you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

17. Electronic Manifest Broker


<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
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18. Comments (include item number for each comment)

19. 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. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative <i>Mori Sorenson</i>	Date (mm/dd/yyyy) 02/07/2019
Printed Name (First, Middle Initial Last) Mori Sorenson	Title Vice President Environmental Compliance
Email mori.sorenson@safety-kleen.com	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	

United States Environmental Protection Agency HAZARDOUS WASTE PERMIT PART A FORM	
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1. Facility Permit Contact

First Name	Nicholas	MI	T	Last Name	Culian Jr.
Title	Senior Environmental Compliance Manager				
Email	nick.culian@safety-kleen.com				
Phone	530-363-2632	Ext	Fax		

2. Facility Permit Contact Mailing Address

Street Address	4210A Hawkins Road		
City, Town, or Village	Farmington		
State	NM	Country	U.S.A
Zip Code	87401		

3. Facility Existence Date (mm/dd/yyyy)

1/1/1981

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
R	N M D 9 8 0 6 9 8 8 4 9	RCRA Part B Permit
N	N M R 0 5 3 0 8 0	NPDS MSGP for Storm Water Discharges

5. Nature of Business

Safety-Kleen is an international, service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance, and dry cleaning.

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0	1	S	0	1	3,820	G	3	Container Storage Areas A
0	2	S	0	2	12,600	G	1	Aboveground Storage Tan

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.		A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes													
									(1) Process Codes					(2) Process Description (if code is not entered in 7.D1))								
0	1	D	0	0	1	20	T	S	0	1	S	0	2									
0	2	D	0	0	2																	Included above
0	3	D	0	0	4																	Included above
0	4	D	0	0	5																	Included above
0	5	D	0	0	6																	Included above
0	6	D	0	0	7																	Included above
0	7	D	0	0	8																	Included above
0	8	D	0	0	9																	Included above
0	9	D	0	1	0																	Included above
1	0	D	0	1	1																	Included above
1	1	D	0	1	8																	Included above

8. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

10. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

11. Comments

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D (1))

Line No.		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									
								(1) Process Codes					(2) Process Description (if code is not entered in 7.D1)				
1	2	D	0	1	9												Included above
1	3	D	0	2	1												Included above
1	4	D	0	2	2												Included above
1	5	D	0	2	3												Included above
1	6	D	0	2	4												Included above
1	7	D	0	2	5												Included above
1	8	D	0	2	6												Included above
1	9	D	0	2	7												Included above
2	0	D	0	2	8												Included above
2	1	D	0	2	9												Included above
2	2	D	0	3	0												Included above
2	3	D	0	3	2												Included above
2	4	D	0	3	3												Included above
2	5	D	0	3	4												Included above
2	6	D	0	3	5												Included above
2	7	D	0	3	6												Included above
2	8	D	0	3	7												Included above
2	9	D	0	3	8												Included above
3	0	D	0	3	9												Included above
3	1	D	0	4	0												Included above
3	2	D	0	4	1												Included above
3	3	D	0	4	2												Included above
3	4	D	0	4	3												Included above
3	5	F	0	0	2	2	T	S	0	1							
3	6	F	0	0	3	4	T	S	0	1							
3	7	F	0	0	5												Included above

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 Farmington Storage Facility

Waste Description	EPA Waste Code	Facility Capacity ¹ (gallons)	Estimated Annual Amount ²
Used Solvents (Petroleum Naphtha)	D001 ³	12,600	5,000
Bottom Sediment from Tank and Ancillary	D001 ³	N/A	3,000
Used Immersion Cleaner	D027 ³ D001	3,820	250

¹ The facility capacity is in gallons.

² The annual amount is in thousands of 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. The total amount of drummed waste stored in the warehouse will not exceed 3,820 gallons

C.2 DESCRIPTION OF WASTES

The solvents managed at this facility are incompatible with strong oxidizers and reactive metals, which are prohibited in the container storage areas. The solvents are compatible with one another.

C.2.1 Wastes Resulting from the Parts Washer Service

Used solvents from parts washers is accumulated in a nominal 12,600-gallon aboveground storage tank via the Return and Fill station. Containers of used material (typically 16- and 30-gallon containers) are poured into a dumpster at the Return and Fill station which in turn empties into the tank. This waste handling method results in several types of solvent waste, which include the following under items 1 through 5:

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, D043, F001, F002 and F003.
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, D043, F001, F002 and F003.
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 1. and 2.
4. **Used Aqueous Parts Cleaning Solvent:** This waste may be bulked at the service center into larger containers that meet DOT specifications or remain in the container in which it was originally used. 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, D043, F001, F002 and F003.
5. **Immersion Cleaners** -
The 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, D043, F001, F002 and F003.

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 spent used solvents from approximately 400 customers, most of who are small quantity generators, and containers of recoverable solvents are returned to the Facility for shipment to a permitted disposal facility.

Safety-Kleen performs a customer prescreening for all parts washer and immersion cleaner service customers. All other waste streams (i.e., dry cleaning wastes and paint wastes), are handled on a 10-day transfer basis. These waste containers remain closed from point of generation (customer) to final disposition.

Prior to leasing a parts-cleaning machine or placing a customer owned machine in service, the customer's business shall be reviewed. Where there is the possibility for contamination of the

parts cleaner solvent (e.g. by pesticide, herbicide, or pharmaceutical operations), the process shall be reviewed to ensure that the solvent is protected from the sources of potential contamination. In reviewing a customer's business, the Facility provides customers with written and verbal information on use of the equipment. This information shall contain at a minimum, the following:

- 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 at the time of service as a part of all parts washer and immersion cleaner services.

C.3.1.1 Qualitative/Visual Analysis

Safety-Kleen sales 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 described below:

- 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 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 try 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 the parts cleaner solvent or immersion cleaner, the container will not be accepted. Contingent on the customer's responses to Safety-Kleen's inquiry of the customer's operation and handling practices, the solvent shall be left with the customer until an analysis is completed to determine its acceptability.
- c. The Appearance of the Liquid in the Drum** – The used mineral spirits have a normally brown or black appearance and float on water. 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 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 further 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 solvent. 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 on proper use of the machines;
5. Training personnel to inspect the physical characteristics of used solvents and determine whether they are acceptable;
6. Indicating on the service document whether the used solvent meets Safety-Kleen's acceptance criteria when waste is collected from a customer;
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;
8. Keeping a record of each incoming and outgoing shipment in the operating log.

Facility customers shall 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 Safety-Kleen 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 chemical analysis, acceptable knowledge in accordance with Permit Section 2.4.3, or a combination of the two methods. Chemical analyses shall be 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 SDS 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.

The homogeneity of waste streams shall be evaluated annually through the Safety-Kleen Recharacterization Process (Quantitative Analysis) and through site evaluation of waste characteristics (e.g., volume differences, color, odor) observed during pickup of wastes from customers. Should the site evaluation identify significant differences in the waste stream from the anticipated waste condition, the Permittees shall require additional testing and information from the generator. Such information shall be placed in the Facility Operating Record, if the waste is accepted for pickup by Safety-Kleen.

In addition to the waste characterization procedures included in this Permit, the Permittees shall submit a random sample received during each month to a chemical analytical laboratory for the analyses listed above. The random samples shall be collected from customers who are infrequent generators (e.g., customers that are serviced less frequently than monthly, new customers, or will call customers). One sample each quarter shall be from a solvent-based waste stream. Samples of aqueous cleaner must be collected during each of the other two months of each quarter. The samples shall be analyzed for Total Metals (using EPA SW846 6010), Total Volatile Organic Compounds (using SW846 8260D, as updated), flashpoint and pH. If the sample analytical results indicate the characteristic of ignitability or corrosivity or the D-listed constituents in the samples are detected at concentrations greater than the concentrations listed in 40 CFR 261.24, then the waste stream shall be deemed a hazardous waste and the customer/generator will be converted to a profiled hazardous waste and assigned the appropriate RCRA characteristic codes. The results of the analysis shall be maintained in the Facility Operating Record.

Recharacterization of Safety-Kleen core waste streams shall be conducted a minimum of once per year or in accordance with the Safety-Kleen Annual Recharacterization process 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 SDS or that could be present as a result of the use of the product.

Hazardous wastes currently included in the re-characterization process are shown below in Table C-2.

**TABLE C.2
WASTE STREAMS CURRENTLY INCLUDED IN FACILITY
RECHARACTERIZATION PROCESS**

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

C.3.1.3 Off-site Waste is analyzed upon Receipt to verify that the waste matches the Description on the manifest

The facility personnel shall inspect each load of waste at the generator’s facility for conformance with the Qualitative/Visual Analysis described in Section C.3.1.1. If the waste does not conform to these criteria, a paper profile shall be completed, or a sample collected for additional analysis to determine if the waste can be accepted. The waste shall 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 stream 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 the Safety-Kleen’s customers have agreed to notify the Permittees when the process or nature of his business has changed. If a container with questionable contents is returned to the Facility, a sample shall be taken and analyzed. The container shall be held at the facility until the analysis is complete. If the analytical results indicate that the waste is different from what was manifested to the Facility, the waste shall 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 Unacceptable Shipments

Safety-Kleen shall perform physical and chemical analysis of a waste stream when 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 on the manifest or shipping documents. The facility shall use the test methods contained in EPA Publications SW-846. The Permittees shall not accept non-conforming waste until a full analysis has been conducted. Procedures to verify waste characteristics occur at several checkpoints in the management of the solvent. If a container with questionable waste is returned to the Facility, a sample shall be collected, and analysis shall be performed at a qualified chemical analytical laboratory.

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

Safety-Kleen manages a limited number of waste streams, most of which originate from new products that are supplied to its customers. The Permittees have evaluated the chemical composition of these products and wastes and have determined that the 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 Waste Compatibility with Containers

Safety-Kleen has evaluated the chemical composition of these products and wastes and has determined that the wastes are compatible with the containers in which they are stored.

C.4.1.1 Procedures for Analyzing Liquids that are collected in a Storage Area

All wastes stored 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 aboveground 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 of wastes to other wastes

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. 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.4.21 Procedures for analyzing liquids collected in the collection area

Waste received at the facility shall 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 Permittees manage 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 Permittees 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 Permittees, as specified in 40 C.F.R. § 264.1083(a)(1)(ii).
4. The Permittees 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 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. INTRODUCTION

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

The Contingency Plan is to be implemented immediately whenever there is a release of hazardous material which could threaten human health or the environment. This 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 Farmington Fire and Police Departments and the San Juan Regional Medical Center Hospital, which 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;
- 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. 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

<u>Primary</u>	<u>Alternate</u>
Kim Holden	Travis Flores
Senior Branch Administrative Assistant	Oil Sales and Service Representative
4210 A Hawkins Road	4210 A Hawkins Road
Farmington, NM 87401	Farmington, NM 87401
Main (office) Phone (505) 327-9070	Main (office) Phone (505) 327-9070
Cell Phone (505) 860-6580	Cell Phone (505) 860-6585

Additional Emergency Notification Phone Numbers

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

External Notification Phone Numbers

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

Designated Emergency Response Authorities

Farmington Fire Department (emergency)	911
Station #19 * (non-emergency)	(505) 599-1430
Farmington Police Department (emergency)*	911
(non-emergency)	(505) 334-6622
San Juan Regional Medical Center * (emergency)	911
Hospital (non-emergency)	(505) 325-5011
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., Farmington 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 areas of 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, shuts off electricity, coordinates evacuation, and contacts the Farmington Fire Department, if necessary, 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 the duties of Incident Commander.

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
List of Government Agencies and Local Authorities to be Notified in an Emergency

Agency or Authority	Telephone Number	Rationale / Service Provided
Farmington Police Department	911 or (505) 334-6622	Notify if there is imminent danger to human health. May assist with traffic control, evacuation (if required) if there is imminent danger to human health.
Farmington Fire Department	911 or (505) 599-1430	Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger.
San Juan Regional Medical Center	911 or (505) 609-2000	Notify if there are any injuries. Assist in providing emergency care of any injuries.
New Mexico Department of Public Safety	(505) 841-8053	Notify if human health or the environment at, and/or outside the Facility is threatened.
National Response Center	(800) 424-8802	Notify if human health or the environment outside the Facility is threatened.
The New Mexico Environment Department	(505) 827-9329	Report releases, fires, and explosions.
Safety-Kleen 24-hour Emergency Response	(800) 468-1760	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 OF THE EMERGENCY COORDINATOR DURING AN EMERGENCY

Whenever there is an imminent or actual emergency 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 and 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 Area-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.

If the fire cannot be extinguished the Farmington 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.

D.4.1.3 Tank Storage Area

There are two 12,600-gallon aboveground 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 aboveground 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.4.1.4 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.4.1.5 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 a 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.4.1.6 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.4.1.7 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 with all deliberate speed, 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 a paved 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 containers outside of the Container Storage Area, the response actions described in 'a' and 'b' above must be followed. Spills inside the Container Storage Area will be prevented from contaminating the environment by the concrete floor and the secondary containment trench. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill.

Cleanups are completed only when the workers have decontaminated 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.4.1.8 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.4.1.9 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.4.1.10 List of Emergency Equipment

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

TABLE D.3
List of Facility Emergency Equipment

Description	Location	Quantity	Capabilities
Dry Chemical Fire Extinguishers-Hand held (type ABC)	Office area, warehouse, storage shed, return and fill shed/station	3	Able to extinguish type A, B, and C fires
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	1	Decontaminate storage unit personnel in the event of a spill or release of harmful material
Telephones/paging system	Office/warehouse area return and fill	7	Alert personnel of an on-site emergency or spill incident, evacuation orders and general in-plant communications
Spill Kits / Absorbents	Tank farm, warehouse, return and fill areas	2	Able to contain and absorb spilled liquids/wastes 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 Hawkins Road to assure that all personnel are accounted for and out of the hazardous area. The order for evacuation may be given by verbal announcement via the facility paging system or by verbal cry/shout. The City of Farmington 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 must 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 of Permit Attachment L (Figures).

D.6. POST EMERGENCY ACTIONS

Immediately after an emergency, the Emergency Coordinator shall ensure that, in the potentially 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 waste/material is 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 five 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.

Safety-Kleen shall notify the 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 shall document the time, date, and details of any incident that requires the implementation of the Contingency Plan. Within 30 days of the incident, the Facility shall submit a written report on the incident to the New Mexico Environment Department. The report shall contain the information set out in Permit Part V, §264.196(d)(3) and shall include:

- 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 and potential hazards to human health or the environment, where this is applicable; and
- g. Estimated quantity and disposition of recovered waste that results from the incident.

D.8. REMEDIAL ACTION RESPONSIBILITIES

If the environment has been contaminated or there is a potential for contamination because of a fire, an explosion, or spill, the emergency coordinator shall contact the Facility's Emergency Response Coordinators to report the incident. The treatment, storage and/or disposal of any recovered waste, contaminated soil or surface water that results from an emergency shall be arranged by the Permittees and carried out as expeditiously as possible.

The emergency coordinator shall ensure that, in the affected area(s) of the facility:

- a. No substance that may be incompatible with the released material is brought onsite until cleanup procedures are completed; and
- b. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

D.9. IMPLEMENTATION SCHEDULE

Where a hazard is imminent, or an accident has already occurred, remedial action shall be taken immediately. The branch manager has the overall responsibility for correcting any discrepancies found during a routine inspection and will consult with the corporate environmental and engineering staffs to design an implementation schedule.

PERMIT ATTACHMENT E

INSPECTION PLAN

E.1. INTRODUCTION

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 are 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
Secondary Containment 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 systems shall be inspected each operating day. The inspections shall include checks of the high-level alarm and the volume held in the solvent tanks. 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. Inspection of the Container Storage Units

The container storage units 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. Inspection of the Dumpster/Drum Washers

The wet dumpster/drum washer (in the Return and Fill station) must be inspected each operating day 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 their daily and weekly inspections:

TABLE E-2
Log Sheet for Weekly Safety and Security Inspection

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":

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

(If an item is not applicable enter 'N/A' after it and draw a line through the 'Acceptable/ Not Acceptable' Row)

TABLE E-3
Weekly Safety-Security Inspection (Electronic Producible Form: Code 29)

Inspector's Name:	
Inspection Date:	
AREA OF INSPECTION	COMMENTS
<i>Safety Security Inspection Instructions:</i> 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:	
<i>Perimeter Fences:</i> Check for evidence of failure (e.g., broken ties, corrosion, holes, distortion, other).	
<i>Gates:</i> - Check for evidence of failure (e.g., locking mechanism, broken ties, corrosion, holes, distortion, other).	
<i>Warning Signs</i> - Check for evidence of failure (e.g., missing, faded, other).	
<i>Exit Signs</i> - Check for evidence of failure (e.g., missing sign, illumination, lamp bulbs, battery backup, other).	
<i>Exits/ Fire lanes/ Evacuation Routes</i> - Check that all routes are clear or unobstructed	
<i>Lighting System</i> - Check for evidence of failure (e.g. expired lamps, effectiveness, location, other).	
<i>Emergency Lighting System</i> - Check for evidence of failure (e.g., expired lamps, battery backup, effectiveness, other).	
<i>Accessibility of Safety Equipment/ Protective Gear</i> - Check for evidence of availability (e.g., hardhats, Face shields, goggles, safety glasses, boots, gloves, clothing, duct tape, absorbents, other).	
<i>First Aid Kits</i> - Check for evidence of availability (e.g., adequate inventory, other).	
<i>Emergency Eyewashes</i> - Check for evidence of failure (e.g., disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, other).	
<i>Emergency Showers</i> - Check for evidence of failure (e.g., disconnected or malfunctioning valves, inadequate pressure, inaccessible, leaking, other).	
<i>Internal/ External Communication</i> - Check for evidence of failure (e.g., inadequate supply of phones or radios, malfunctioning intercom, emergency alarm does not work, phone moved from proper location, other).	
<i>Fire Extinguishers</i> - Check for evidence of failure (e.g., overdue inspection, not charged, inaccessible, other).	
<i>Absorbent Supply</i> - Check for evidence of availability (e.g., adequate inventory, other).	
<i>Fire Suppression System Accessibility</i> - Check for evidence of failure (e.g., monitors, pull stations, alarms, other).	
<i>Fire Suppression System Operable</i> - Check for evidence of failure (e.g., test, other).	
<i>Hearing Protection Available</i> - Check for evidence of availability (e.g., type appropriate per location, other).	
<i>Housekeeping</i> - Check for evidence of failure (e.g., blocked egress, proper storage, procedure followed, other).	
<i>Dumpster/ Outside Containers</i> - Check for evidence of failure (e.g., housekeeping, condition, appropriate use and storage, other).	
Compliance Footer	
Inspector Signature	
Attach Photo	
On Demand Work Ticket	

TABLE E-4 Inspection Log Sheet, Container Storage Area

Inspector's Name/Title: _____
(Print Inspector's Name and Job Title Above)

	Monday	Tuesday	Wednesday	Thursday	Friday
Inspector's Signature Box					

Date _____
mm/dd/yy mm/dd/yy mm/dd/yy mm/dd/yy mm/dd/yy

Time _____ am / pm _____ am / pm _____ am / pm _____ am / pm _____ am / pm

CONTAINERS – When calculating volume use outer capacity of container. *If other waste, list name

Type of Waste	Monday	Tuesday	Wednesday	Thursday	Friday
Total Volume of					
Total Volume of					
Total Volume of					
Total Volume of					
Total Volume of					
Total Volume of					
Total Volume of					
Total Volume of					
Total Volume of					
Total Gallons					

Total Volume A N A N A N A N A N

If 'N' circle appropriate problem: total volume exceeds permitted amount, other: _____

Container Condition A N A N A N A N A N

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

Stack/Placement, Aisle Space A N A N A N A N A N

If 'N' circle appropriate problem: different from Part B Floor Plan, unstable stacks, broken or damaged pallets, containers not on pallets, other: _____

Containment, Curbing, Floors, Sumps A N A N A N A N A N

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: _____

(Any material which spills, leaks or accumulates in the secondary containment must be completely removed immediately upon detection)

Observations, comments, date and nature of repairs of any items indicated as Not Acceptable _____

A = Acceptable N = Not Acceptable
IF AN ITEM IS NOT APPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW

TABLE E-5
Daily Container Storage Electronic Inspection Log (Code 28)

Compliance Header	
Inspector Name	
Inspection Date	
Area of Inspection	COMMENTS
CO CSA 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.	
CO CSA Inspection Items	
<u>Sealing of Containers</u> - Check for evidence of failure (e.g., containers not closed or sealed, open).	
<u>Labeling of Containers</u> - Check for evidence of failure (e.g., no label, improper label, content, other).	
<u>Container Integrity</u> - Check for evidence of failure (e.g., condition, bulging, leaks, other).	
<u>Pallets</u> - Check for evidence of failure (e.g., broken, loose, condition).	
<u>Doors</u> - Check for evidence of failure (e.g., indoor area, broken or not working as intended).	
<u>Base/ Foundation/ Roof</u> - Check for evidence of failure (e.g., cracked, gaps, other).	
<u>Berms/ Racks</u> - Check for evidence of failure (e.g., cracks, gaps, broken, other).	
<u>Aisle Space</u> - Check for evidence of failure (e.g., minimum 2.5 feet required, other).	
<u>Containment Area</u> - Check for evidence of failure (e.g., secondary containment, curbing, floor, cracks, deterioration, other).	
<u>Sumps</u> - Check for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, other).	
Loading/ Unloading Areas - Check condition of area (e.g., available equipment, spill response, containment, pad condition, other).	
Storage Capacity - Check for acceptable limit (e.g., area or permit restrictions, type restriction, volume limit, other).	
Inventory Age - Check for acceptable limit (e.g., within area limits, permit restrictions, other).	
Compliance Footer	
Inspector Signature	
Attach Photo	
On Demand Work Ticket	

TABLE E-6 Daily Tank Storage System Inspection Log (Paper Form)

Inspector's Name/Title: _____
(Print Inspector's Name and Job Title Above)

	Monday	Tuesday	Wednesday	Thursday	Friday
Inspector's Signature Box					

Date _____ mm/dd/yy mm/dd/yy
 mm/dd/yy mm/dd/yy mm/dd/yy
 Time _____ am / pm _____ am / pm _____ am / pm _____ am / pm _____ am / pm

Volume in Tank/Spent Solvent (in/gal)	/	/	/	/	/
Volume in Tank 150 Product (in/gal)	/	/	/	/	/

Tank Volume A N A N A N A N A N

Tank Exterior A N A N A N A N A N

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

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

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

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

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

Containment Area (Tank Farm)

Any material spilled, leaked, or otherwise accumulated in the dike, including rainwater, must be completely removed within 24 hours of detection.

Bottom & Walls A N A N A N A N A N

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

Rigid Piping /

Supports A N A N A N A N A N

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

Observations, comments, date and nature of repairs of any items indicated as Not Acceptable _____

A = Acceptable N = Not Acceptable
 IF AN ITEM IS NOT APPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW

TABLE E-7
Daily Tank Storage System Inspection (Electronic Producible Form: Code 27).

Compliance Header
Inspector Name
Inspection Date
Area of Inspection
CO 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.
CO Tank Systems Inspection Items
<u>Tanks</u> - Check for evidence of failure (e.g., rusty or loose anchoring, distortion, paint failure, other).
<u>Pipes</u> - Check for evidence of failure (e.g., distortion, corrosion, paint failure, other).
<u>Valves</u> - Check for evidence of failure (e.g., disconnected, corrosion, other).
<u>Fittings</u> - Check for evidence of failure (e.g., loose, disconnected, corrosion, other).
<u>Liquid Level</u> - Check for acceptable level. (e.g., high level max, permitted volume, other).
<u>Monitoring Equipment</u> - Check for evidence of failure (e.g., pressure and temperature gauges, level indicators, other).
<u>Loading/ Unloading Areas</u> - Check condition of area (e.g., available equipment, spill response, containment, pad condition, other).
Compliance Footer
Inspector Signature
Attach Photo
On Demand Work Ticket

**TABLE E-8
DAILY INSPECTION LOG SHEET FOR THE RETURN AND FILL STATION**

Inspector's Name/Title:
(Print Inspector's Name and Job Title Above)

	Monday	Tuesday	Wednesday	Thursday	Friday
Inspector's Signature Box					

Date

mm/dd/yy

mm/dd/yy

mm/dd/yy

mm/dd/yy

mm/dd/yy

Time

_____ am / pm

_____ am / pm

_____ am / pm

_____ am / pm

_____ am / pm

Pump Seals

A N

A N

A N

A N

A N

If 'N' circle appropriate problem:

leaks other:

Motors

A N

A N

A N

A N

A N

If 'N' circle appropriate problem:

overheating, other:

Fittings

A N

A N

A N

A N

A N

If 'N' circle appropriate problem:

leaks, other:

Valves

A N

A N

A N

A N

A N

If 'N' circle appropriate problem:

leaks, sticking, other:

Hose Fittings and Connections

A N

A N

A N

A N

A N

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

Hose Body

A N

A N

A N

A N

A N

If 'N' circle appropriate problem: crushed, cracked, thin spots, leaks, other:

Fusible Link

A N

A N

A N

A N

A N

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

Wet Dumpster

A N

A N

A N

A N

If 'N' circle appropriate problem: excess sediment buildup, leaks, rust, spilt seams, distortion, deterioration, debris, other:

Secondary Containment

A N

A N

A N

A N

A N

If 'N' circle appropriate problem: excess sediment/liquids, 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:

(Any material which spills, leaks or accumulates in the secondary containment must be completely removed immediately upon detection)

Observations, comments, date and nature of repairs of any items indicated as Not Acceptable

A = Acceptable N = Not Acceptable

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 their 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, 8-hour HAZWOPER refresher, 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 three years after termination of their employment.

PERMIT ATTACHMENT G

CLOSURE PLAN

G.1 INTRODUCTION

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 aboveground 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 Part 5, Section 5.4.3.

The Facility comprises the following 4 structures.

1. One 1,530 square foot warehouse with offices, bathrooms, a sales representative room, a warehouse and a container storage units used for drum storage;
2. Two 12,600-gallon aboveground storage tanks for clean and used solvent;
3. A new barrel storage area
4. One solvent Return and Fill station with a loading dock, wet dumpster, drum washer, and secondary containment; and
5. One 24,000-gallon, and one 21,000-gallon aboveground storage tanks, with diking used for storage of used oil and antifreeze.

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 treatment. There is no onsite hazardous waste treatment or disposal.

A complete physical and operational description of the Facility can be found in Permit Attachment A. The various Facility components are shown on the Site Plan in Figure 2, Permit Attachment L (Figures).

The Facility is permitted to manage and store hazardous wastes in containers and tanks. The EPA waste codes of the authorized wastes are listed in Permit Attachment B, Section B.2. 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 Part 5, Section 5.3 and Sections G.2 through G.7 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 all 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, hazardous constituents or other contaminants.

The Permittee shall summarize the results of the records review in the closure report. The Permittee shall update the list of contaminants 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 chemicals 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 5.4.3.

G.2 Aboveground 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. Pressure wash with detergent solution, rinse, scrape, and squeegee the tank interiors as practicable to completely remove all residual waste material and rinsate.
- d. Disconnect, remove and decontaminate all ancillary piping and pumping equipment and associated secondary containment.
- e. Remove the tanks, secondary containment structures and remove all affected soils for off-site disposal.
- f. Visually inspect the tanks for evidence of leakage.
- h. Collect soil samples from beneath the tanks and aboveground ancillary equipment for chemical analyses based on the wastes managed in the tanks as identified in the records review described in Section G.1.1 above.

- i. Backfill any 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 tanks may be accessed after ventilation using non-sparking 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 cleaned to remove 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 to 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. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material. The tanks shall be removed at closure and properly disposed. Decontamination procedures shall be monitored prior to removing the tanks to verify that 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 and containment system shall be removed.

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. Soil samples shall be collected from beneath the tank locations and at all locations where field screening

indicates evidence of contamination. Soil samples also shall be collected from beneath the Return/Fill location after removal of the drum and all ancillary equipment and the containment system. The samples shall be obtained from the native soils directly beneath the fill underlying the structures. 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 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.

Once all residual contamination present at concentrations greater than residential cleanup levels has been removed 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 Part 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 Sampling and Analysis Plan.

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 underlying base and containment system also shall be removed. 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 vacuum 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 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. The debris and components of the return/fill station be managed appropriately for disposal or recycling.

G.6 LOADING DOCKS SOIL SAMPLING

Soil samples shall be collected at closure near 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.7 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>			
Container Storage Area	<i>3820 gallons</i>	Accepts waste from off-site generators. Manages and stores hazardous waste in drums in an area 17' x 38'. <i>Total square footage: 646</i>	Indoors
<i>2. Hazardous Waste Storage in Tanks (Process Code SO₂)</i>			
Two Aboveground Storage Tanks, each with a capacity of 12,600 gallons (one tank contains hazardous waste and one tank contains product)	25,200 gallons	Accepts waste from off-site generators. Manages and stores hazardous waste in two Aboveground Storage Tanks, with diking used for storage of used solvent and products in an area 38.5' x 23.5'. <i>Total square footage: 905</i>	Outdoors
Two Aboveground Storage Tanks, one with a capacity of 24,500 gallons, and the other 21,000 gallons, respectively (nonhazardous waste)	45,500 gallons	Accepts waste from off-site generators. Manages and stores hazardous waste in two Aboveground Storage Tanks, with diking used for storage of used oil and antifreeze in an area 25' x 52'. <i>Total square footage: 1,300</i>	Outdoors

PERMIT ATTACHMENT K

SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN

(RESERVED)

PERMIT ATTACHMENT L FIGURES

L.1 FIGURES

- Figure 1:** Regional Map of Farmington showing the Facility's location in San Juan County, New Mexico

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

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

- Figure 4:** Wind Rose Map for the City of Farmington

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

- Figure 6:** Facility Emergency Evacuation Diagram

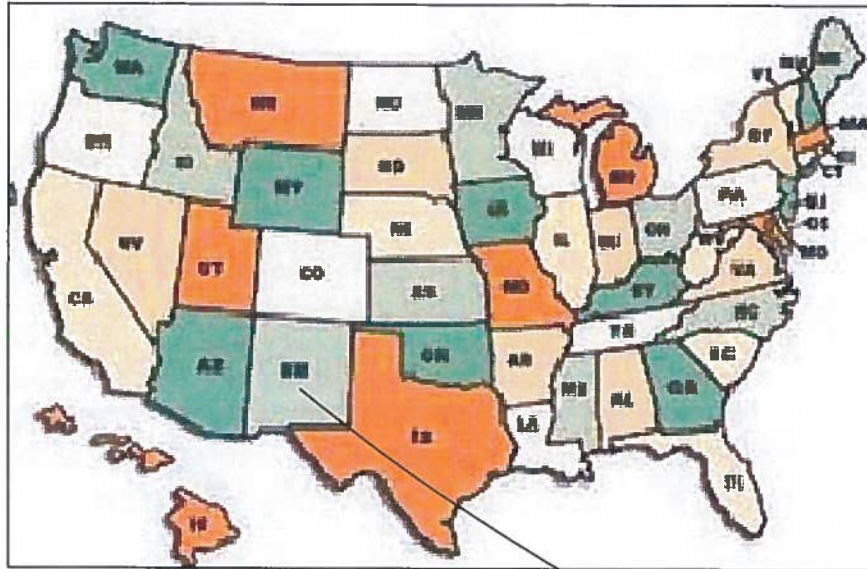


Figure 1: Regional Map showing the Facility's Location

SITE LOCATION MAP

4210A HAWKINS RD.
FARMINGTON, N.M. 87401

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SAFETY-KLEEN SYSTEMS, INC.
2600 N. CENT. EXPRESSWAY STE 400 RICHARDSON, TX. 75080
PHONE 800-689-5740

SCALE NONE	BY JEK	CHKD NT	APPR NT	OP. APPR NT	DATE 9/14/16
STANDARD BRANCH FARMINGTON, N.M.			SC-DWG NUMBER 7133-SPO0-035		REV. NO. 0

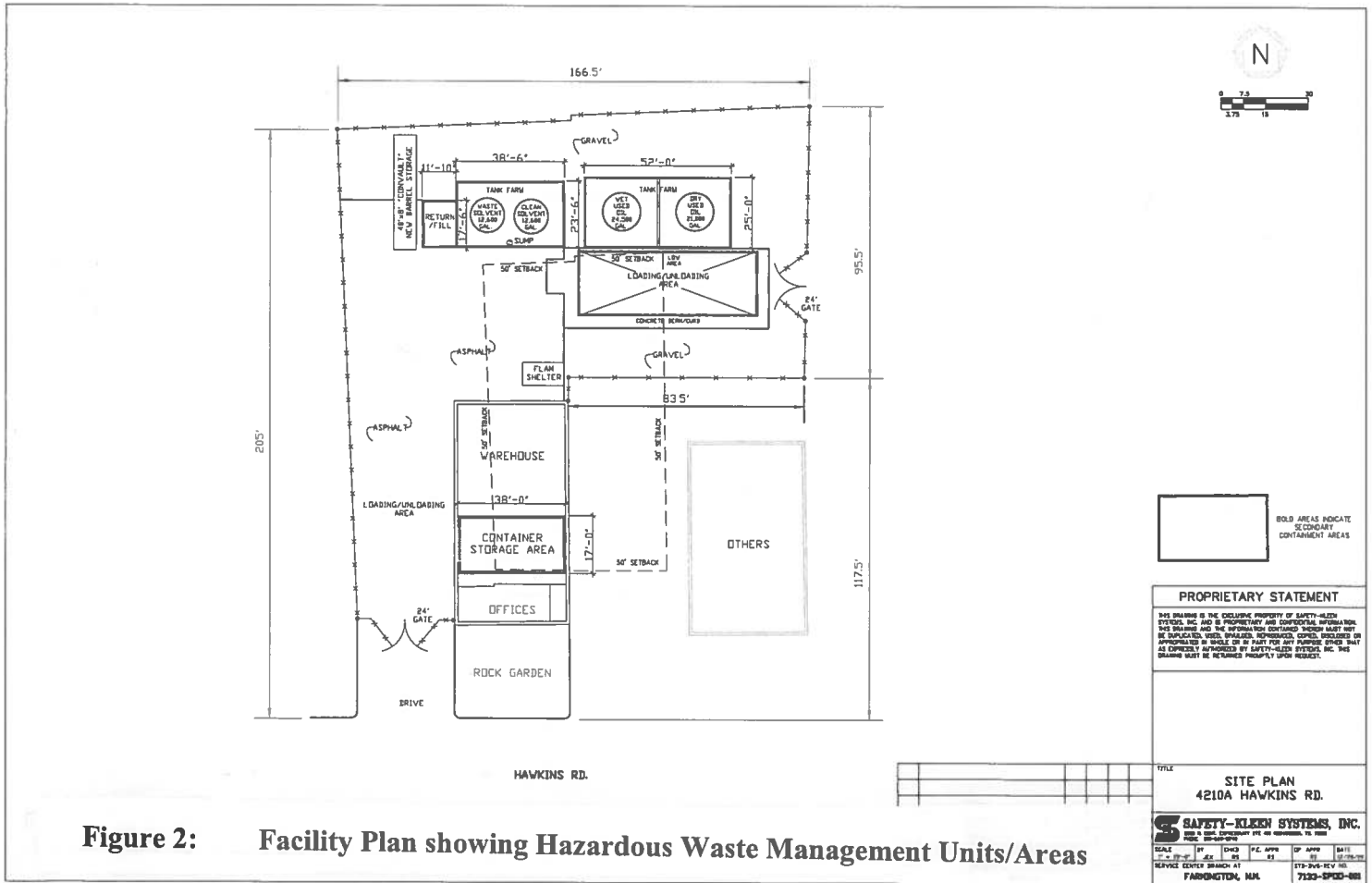
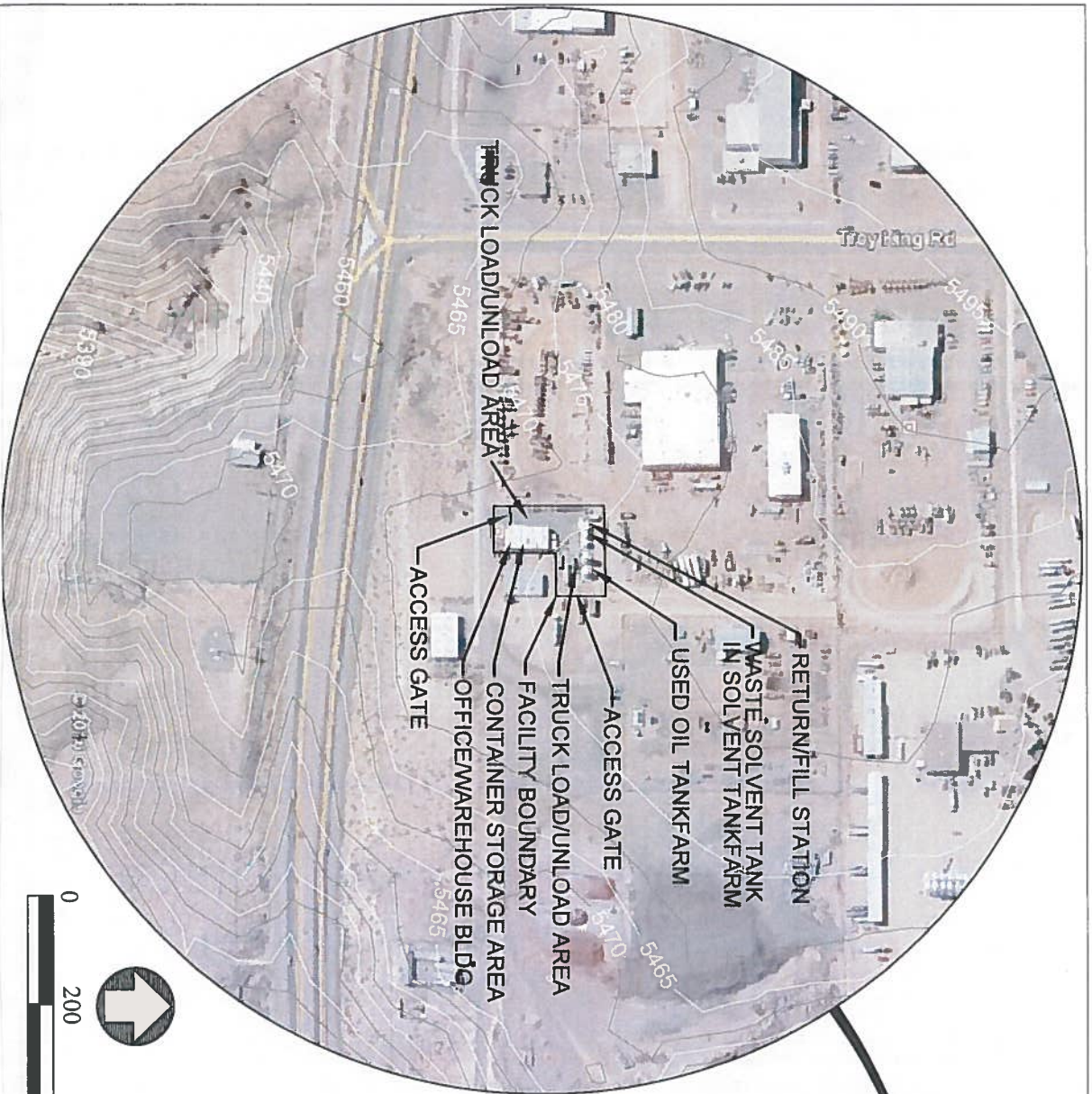


Figure 2: Facility Plan showing Hazardous Waste Management Units/Areas

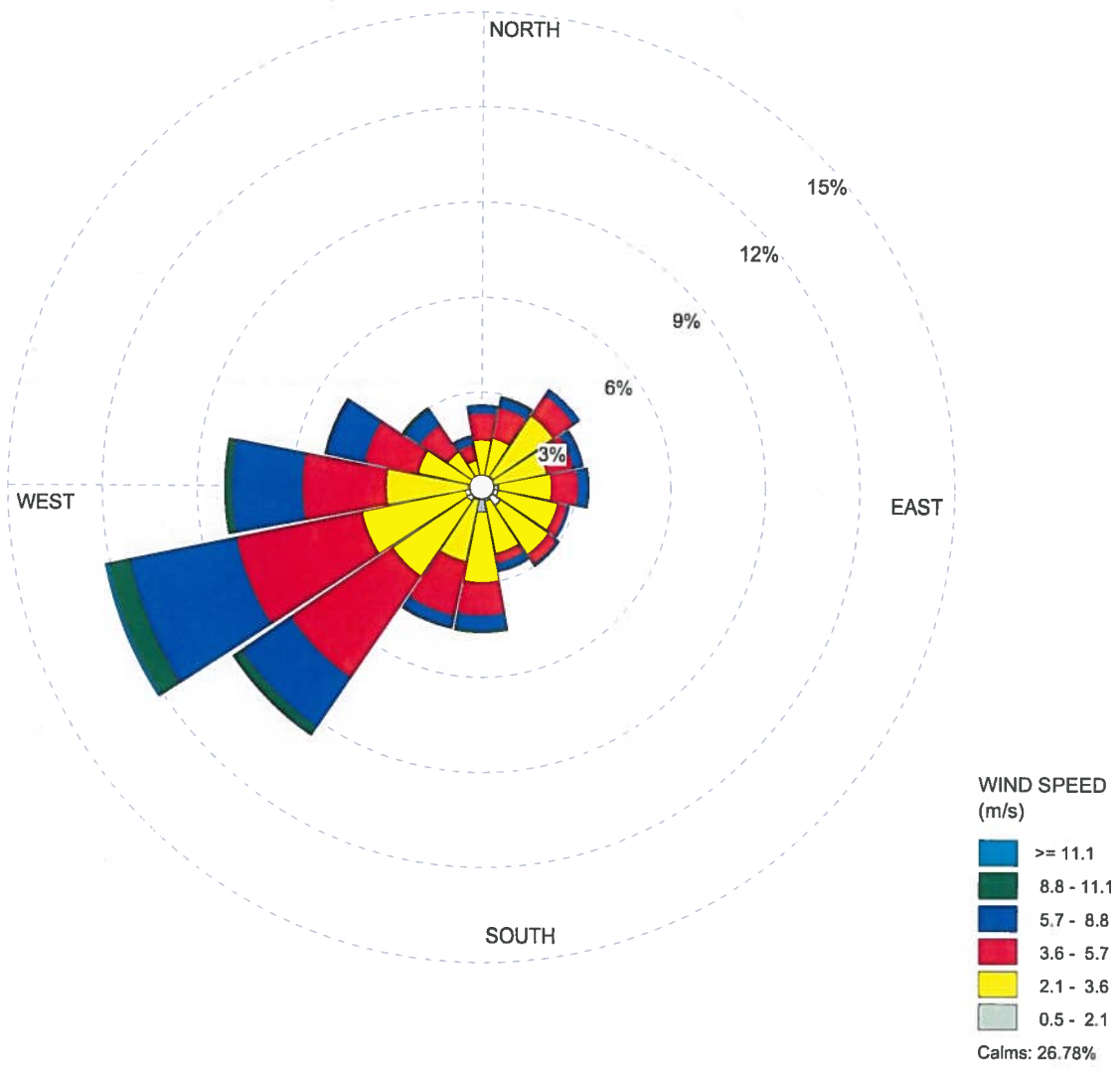


AERIAL PHOTOGRAPH SHOWING THE LOCATION OF THE FACILITY

- NOTES:**
1. ALL DATUM SHOWN BASED ON USGS NAVD 1988
 2. SUBJECT PROPERTY IS WITHIN FEMA ZONE "X"
 3. THERE ARE NO RECREATION AREAS, RUNOFF CONTROL SYSTEMS, INTERNAL ROADS, STORM, SANITARY AND PROCESS SEWER SYSTEMS OR FIRE CONTROL FACILITIES ON THIS SITE
 4. THERE ARE NO BARRIERS FOR DRAINAGE OR FLOOD CONTROL ON THIS SITE.

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

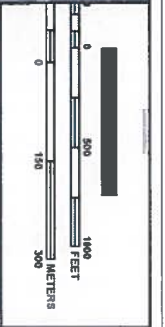
Figure 4: Wind Rose Map for the City of Farmington



JEK DRAFTING & DESIGN	DATA PERIOD: Start Date: 1/1/1992 - 00:00 End Date: 12/31/1992 - 23:00	COMPANY NAME: SAFETY-KLEEN SYSTEMS, INC.	
	CALM WINDS: 26.78%	MODELER:JEK	TOTAL COUNT: 8784 hrs.
	AVG. WIND SPEED: 2.81 m/s	DATE: 8/19/2015	DWG. NO.:7133-SP00-049 FARMINGTON, N.M.



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



NATIONAL FLOOD INSURANCE PROGRAM

FIRM
FLOOD INSURANCE RATE MAP
SAN JUAN COUNTY,
NEW MEXICO
AND UNINCORPORATED AREAS
PANEL 082 OF 2180

DEED MAP NUMBER FOR PANEL LOCATION: 350010

CONTRACT: 350010
EFFECTIVE DATE: AUGUST 5, 2010

MAP NUMBER: 350008082

Federal Emergency Management Agency

This is an official copy of a portion of the original information used to create this map. It is not a reproduction of the original information. The map does not reflect changes to the data. For the most current information, please contact the National Flood Insurance Program. Map scale: 1 inch = 1 mile. Map Date: 08/05/10. Map Sheet: 082 of 2180.

NO.	DESCRIPTION	REV.	CHK.	DATE
0	ISSUED FOR REVIEW			08/11/10

LEGEND

SPECIAL HOAZED AREAS (SHHA) SUBJECT TO FLOODING BY THE 1% ANNUAL CHANCE FLOOD

The 1% Annual Chance Flood (ACF) is the flood that has a 1% chance of being equaled or exceeded in any given year. The ACF is the most severe flood that is expected to occur on average once every 100 years. The ACF is the flood that is used to determine the flood insurance rates for the 1% Annual Chance Flood (ACF) zone.

1% ANNUAL CHANCE FLOOD (ACF)

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GENERAL NOTES

1. This map is a reproduction of the original information used to create this map. It is not a reproduction of the original information. The map does not reflect changes to the data. For the most current information, please contact the National Flood Insurance Program. Map scale: 1 inch = 1 mile. Map Date: 08/05/10. Map Sheet: 082 of 2180.

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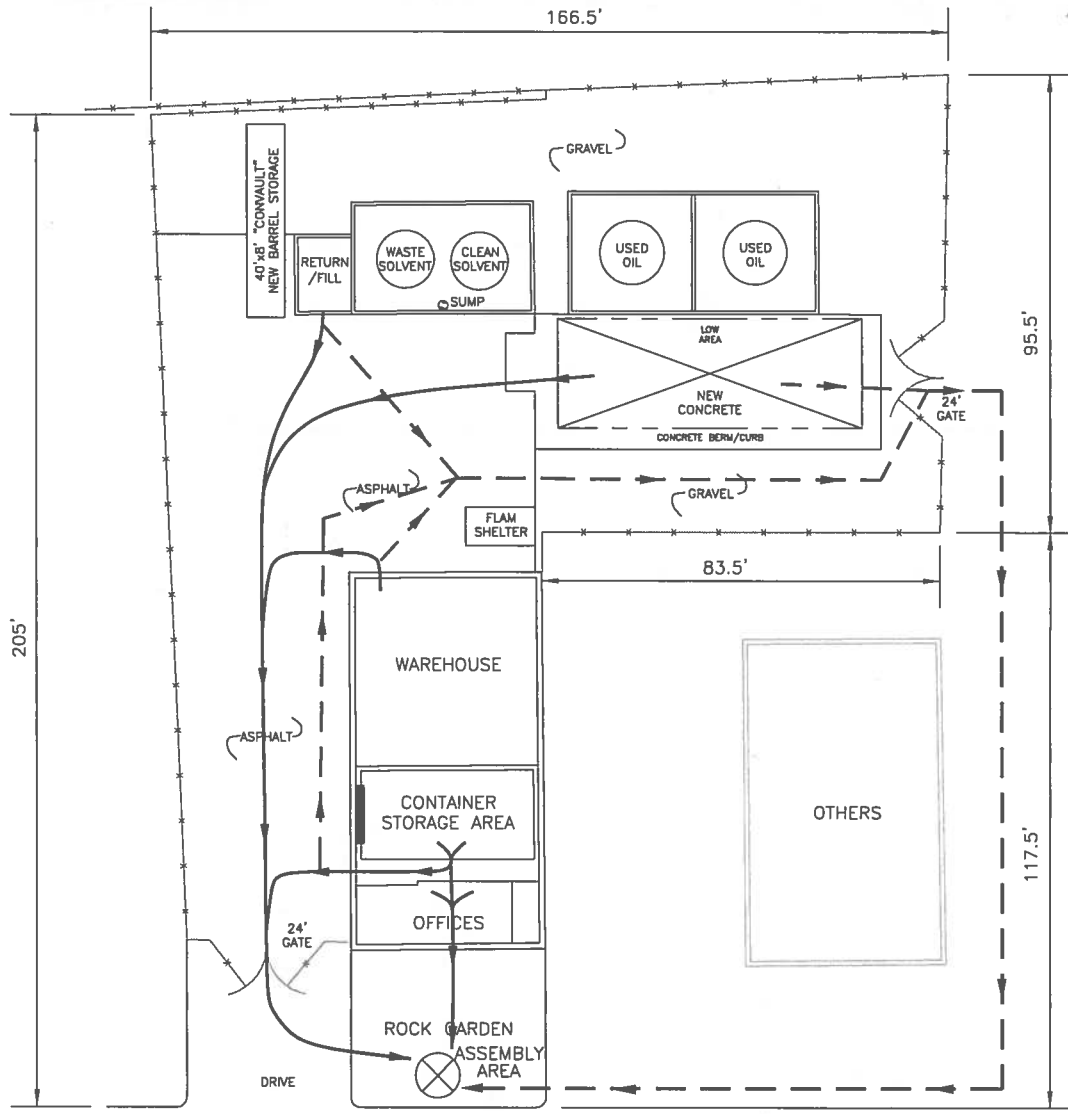
PROPRIETARY STATEMENT

SAFETY-KLEEN SYSTEMS, INC.
10000 N. CENTRAL AVENUE
FARMINGTON, N.M. 87401

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10000 N. CENTRAL AVENUE
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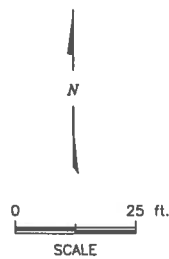
SAFETY-KLEEN SYSTEMS, INC.
10000 N. CENTRAL AVENUE
FARMINGTON, N.M. 87401

Figure 6: Facility Emergency Evacuation Diagram



HAWKINS RD.

A Trihydro Corporation representative conducted a field inspection to verify construction, equipment, components, dimensions and existing conditions on February 28, 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 February 28, 2001 inspection.



REVISIONS	
Date	By
04/25/16	JEK



LEGEND	
	EVACUATION ROUTES
	ALTERNATE EVACUATION ROUTES

FIGURE F-2
EVACUATION PLAN
4210A HAWKINS RD.
FARMINGTON N.M.

