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June 26, 2003

RECEIVED
RCRA
JUN 30 2003
Hazardous Waste Regulation

Hazard Waste Section, Division of Solid Waste
Department of Environmental Protection
2600 Blair Stone Road, Room 609
Tallahassee, Florida 32399-2400

**RE: Updated Closure Plan for
TRANSFLO Terminal Services, Inc. - Jacksonville
EPA ID# FLD984253526**

Dear Sirs:

TRANSFLO Terminal Services, Inc. operates a transloading facility of bulk chemicals and products that includes used oil and hazardous waste liquids from truck to railcar and railcar to truck. In accordance with FAC 62-730.171.2(b) changes to facility operations necessitated a revision to our Facility Closure Plan. Enclosed is the updated Closure Plan for the TRANSFLO Terminal located at 116 RR Druid Street in Jacksonville, Florida.

I have been working with the Jacksonville FLDEP office to ensure the updated Closure Plan meets the States' requirements. If additional copies are needed or questions arise please contact me a call at (904) 273-6508 or via email at jbarnes@transflo.net

Sincerely,


Jan M. Barnes
Assistant Dir. HS&E

Enclosure

RECEIVED

AUG 25 2003

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

DOCKET# 03.6.1

**Hazardous Waste Transfer Facility
Closure Plan**

**TRANSFLO Terminal
116 RR Druid Street
Jacksonville, FL 32254**

**Owner:
TRANSFLO Terminal Services, Inc.
6735 Southpoint Drive South; J-975
Jacksonville, FL 32216**

Revised: June 2003

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FIGURE 1 SITE PLAN

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1 INTRODUCTION

1.1 Purpose

This plan has been prepared in accordance with the requirements of 40-CFR, Part-265 and 62-730.171 Florida Administrative Code (FAC) for closure of RCRA transfer facilities and identifies all steps necessary to close the hazardous waste transfer area at the TRANSFLO terminal in Jacksonville, Florida. This plan provides for the clean closure of this area; therefore, a post-closure plan is not required. The facility is not subject to the post-closure care requirements of disposal facilities.

As required by 40-CFR, Part-265, Subpart G and 62-730.171 FAC (i.e. closure performance standard), the closure procedures described in this plan will minimize the need for further maintenance, and will control, minimize or eliminate, to the extent necessary to protect human health and the environment, escape of hazardous waste, constituents, leachate, contaminated run-off, or waste decomposition products to the ground of surface waters or to the atmosphere.

A copy of this plan will be stored at the facility at all times and will be available for review during normal working hours by representatives of the Florida Department of Environmental Protection (FDEP) and U. S. Environmental Protection Agency, Region IV, until closure of the transfer area is complete.

The following sections of the closure plan provide information concerning the clean closure of the hazardous waste transfer area as required by 62-730.171(2)(b) FAC and 40-CFR 265.111, 265.112(c), 265.114, and 265.115. Section 1 of this plan provides a physical description of the facility and waste management practices. Section 2 provides a description of a field inspection conducted at the site. Section 3 identifies closure objectives. Section 4 presents the procedures necessary for final closure of the hazardous waste transfer area.

1.2 Facility Description

1.2.1 General

The facility and equipment are owned by TRANSFLO Terminal Services, Inc. (TTSI) and are operated by Kinder Morgan Material Services (KMMS). KMMS is responsible for the daily operations and ensuring that all operational requirements are met. The TRANSFLO Terminal is located at 116 RR Druid Street in Jacksonville, Florida, approximately two miles north of Interstate-10, in Jacksonville, Florida. Directions to the facility are to take the McDuff Avenue exit from I-10, head north on McDuff approximately 1 mile, and take a left (west) on Warrington Street. Warrington Street dead-ends approximately 25 yards from the entrance to the terminal.

The terminal provides "transloading" services for bulk materials, in that bulk material is transloaded between rail cars and highway cargo tanks with no intermediate storage.

The overall facility is approximately 4 acres and consists of a truck scale with two ramps, a small office where administrative services for inventory management and document preparation, a 1000 square foot equipment maintenance shop, and portable equipment (e.g. pumps, conveyor systems) that is used to transfer material between railcars and highway cargo tanks. Rail cars are placed by the serving railroad (CSXT) on the railroad track spurs inside the facility for loading and unloading of bulk materials.

The hazardous waste fuel to be transferred at this terminal is an industrial furnace fuel brought to the facility in highway cargo tanks. The hazardous waste fuel is then pumped into rail cars for further transportation to a facility for use as a fuel. Only one rail tank car will be loaded at a time. The number of railcars on-site at any given time will range from 1 to 4, depending on the service received from CSXT and other operational factors. Figure 1 shows the TRANSFLO terminal and the designated hazardous waste fuel transfer area.

1.2.2 Waste Transferred

Because of the transfer of this hazardous waste fuel, the TRANSFLO terminal is a hazardous waste "transfer facility". The hazardous waste transferred at the terminal is a synthetic fuel/industrial furnace fuel (D001, D008, D009, D010, D011, D035, F001, F002, F003, F004, and F005). A copy of the Material Safety Data Sheet for the synthetic fuel is provided in Appendix A.

1.2.3 Hazardous Waste Transfer Area

TRANSFLO has designated an area in the middle section of the terminal as the hazardous waste transfer area. This area, as illustrated in Figure 1, is adjacent to track number 3, just north of the terminal office. A 100 foot wide asphalt paved section between the two tracks is wide enough to drive a semi-truck along. The transfer area is approximately 120 feet long. The rail cars will be loaded on the eastern end of track number 3, on the north side of the track. This area is long enough to spot two rail tank cars. Drip pans are in place on the designated loading area. A 6 foot wide area directly under the drip pans is constructed of railroad ballast only. Asphalt pavement is located on both sides of track number 3.

All truck and rail cars entering and leaving the terminal will be clearly and properly labeled to identify their contents, consistent with applicable regulations for the transportation of hazardous materials and any applicable health and safety requirements.

1.2.4 Maximum Inventory

The approximate maximum quantity of hazardous waste capable of being stored in one rail tank car in the transfer area is approximately 20,000 gallons. It is not anticipated that loaded rail cars will be on-site for more than five days. Typically, the rail tank car switch out schedule is four days per week. Section 62-730.171, F.A.C., however, allows on-site storage of hazardous waste for up to ten (10) days.

2 FIELD INSPECTION

2.1 Observations

On April 24, 2003, personnel from TRANSFLO Terminal Services performed an inspection of the TRANSFLO hazardous waste transfer area. The purpose of this inspection was to :

- Identify potential signs of spills or leaks (e.g., stained or damaged concrete or asphalt)
- Evaluate the integrity of the staging area, containment devices, and drains.
- Observe a test transfer to confirm the process.

The inspection revealed that the transfer area is in good condition. The asphalt paving has minor cracks near the transfer area, but is otherwise in good repair. The asphalt is approximately 2-inches thick with a 6-inch lime rock base. Stainless steel drip pans are in place between the rails in the transfer area. There is no drain system for the drip pans. At the time of inspection there were no visible cracks in the drip pans. No signs of spills or leaks were identified in the transfer area.

3 CLOSURE OBJECTIVES

3.1 General

Closure of the hazardous waste transfer area will be conducted in a manner that will meet the closure performance standard of 40-CFR-265.111. The general closure performance standards require that closure activities:

- Minimize the need for further maintenance.
- Control, minimize or eliminate, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground, surface waters, or to the atmosphere.
- Comply with the closure requirements of this subpart, including, but not limited to, the requirements of 40-CFR-265.197, 265.228, 265.258, 265.280, 265.310, 265.351, 265.381, 265.404, and 264.1102 in as much as they apply to this facility.

Implementation of the closure procedures described in Section 4 of this plan will ensure that the above performance standards are met.

In order to determine whether closure activities are complete, "action levels" for those specific hazardous substances associated with the synthetic fuel handled in the transfer area will be used. The action levels used at the TRANSFLO terminal are the Groundwater and Surface Water Clean-up Target Levels and the Soil Cleanup Target Levels specified in F.A.C Section 62.777. Table 1 lists the specific hazardous substances of concern. Those compounds are constituents of the synthetic fuel transferred at the TRANSFLO terminal, and will serve as an indicator for hazardous substances.

4 CLOSURE PROCEDURES

4.1 General

This section describes the procedures to be followed in the event the hazardous waste transfer area permanently ceases to handle hazardous waste, or an emergency triggering the cleanup procedures of the contingency plan occurs. This closure plan assumes that contingency plan procedures will limit any contamination to the hazardous waste transfer area indicated on Figure 2. In the event that contingency plan procedures are not completely successful, some additional areas may need to be closed and the closure plan will then be expanded to address the other areas.

4.2 Partial Closure - Hazardous Waste Transfer Area

Partial closure of the transfer area prior to final closure is not anticipated.

4.3 Final Closure - Hazardous Waste Transfer Area

The hazardous waste transfer area is located in the middle section of the terminal as shown in Figure 2. If the transfer area is closed, and no release has occurred, then a visual inspection of the area will be conducted. Stains, odors, and other signs of spills will be looked for during the inspection. A total of four soil samples will be collected in the ballast area underneath the loading area of track number 3. Track number 3 was constructed in the 1990's on top of the existing paved surfaced, so any releases from the tank car would be present in the ballast area. The samples will be analyzed for compounds listed in Table 1 to confirm that results are below the action levels.

The following closure activities will be followed for final closure of the transfer area if a spill has occurred. All hazardous wastes will be removed from the transfer area and transported to an appropriate permitted disposal facility. Pads or containment berms will be placed to control movement of liquids on the ground surface and in the drip pans. Free liquids will be pumped into drums or tanks, or adsorbed with pads. Asphalt, drip pans, and rails will be washed with a non-alcohol based detergent and then steam rinsed. Runoff will be controlled by the use of adsorbent pads or containment berms. The ballast will be recovered and washed in an appropriate soil washing system. The detergent wash water and rinse water will be collected and stored in separate, labeled drums for chemical analysis. All liquids, soil and other waste materials will be managed as hazardous waste until such time as analysis proves their non-hazardous nature. Soil samples will be taken in the ballast area between the rail and the asphalt and analyzed for the compounds listed in Table 1. The soils will be excavated if the analytical results indicate that the soils are contaminated above the action levels for the hazardous substances listed in Table 1. Soils will be excavated, horizontally and vertically, until sampling indicates contaminant levels are below the action levels. If a groundwater impact is suspected, then a groundwater assessment and remediation plan will be submitted to FDEP for review and approval.

A sample of the final rinse, soil samples, and groundwater samples, if necessary, will be collected, plus a duplicate for each media. Appropriate QA/QC procedures will be followed for sample collection, analysis, and data verification (see Appendix B). Samples will be analyzed for the compounds listed in Table 1. All sampling and analysis will be conducted by a National Environmental Laboratory Accreditation Program (NELAP)-certified laboratory. Results will be compared to the action levels referenced in Section 3.. If the analysis indicates contamination (i.e., concentrations are above the action levels), then decontamination procedures will be repeated for the contaminated media, or an alternative procedure will be proposed. TRANSFLO reserves the right to propose alternative action levels should the final analyses from a second cleaning exceed the action levels referenced in Section 3.

In accordance with 40-CFR-265.114, during closure activities all contaminated equipment, structures and soil will be properly disposed of, or decontaminated. Collected wash water and rinsate will be characterized per hazardous waste requirements. Hazardous wastes will be shipped to a permitted Treatment, Storage, and Disposal Facility (TSDF) in accordance with 40-CFR, Part 262. Non-hazardous wastes will be containerized and sent to an appropriately permitted waste facility.

4.4 Schedule and Notifications

This closure plan shall be submitted to the FDEP in order to authorize a change to this closure plan. The plan will be amended if:

- Changes in operating plans or facility design affect the closure plan, or
- There is a change in the expected year of closure, if applicable, or
- In concluding final closure activities, unexpected events require a modification of the closure plan, or
- The waste handled changes from that described in this plan

As required by 40-CFR-265.112(c) (2) and (3), TRANSFLO will amend, and submit to FDEP, the modified closure plan at least 60 days prior to the proposed change in facility design, or operation, or no more than 60 days after an unexpected event has occurred which has affected this closure plan. If an unexpected event occurs during the final closure period, TRANSFLO will amend, and submit to FDEP, the modified closure plan no more than 30 days after the unexpected event.

In accordance with 40-CFR-265.112(c)(4), FDEP may request modifications to the closure plan under the conditions described in 40-CFR-265.11(c)(1). TRANSFLO must submit the modified plan within 60 days of the request from FDEP, or within 30 days if the unexpected event occurs during final closure.

4.5 Certification of Closure

in accordance with 40-CFR-265.115, upon completion of final closure activities, a certification of closure will be prepared and certified by the owner or operator and an independent registered professional engineer indicating that the transfer area has been closed as specified in the approved closure plan. This certification will be transmitted to FDEP via registered mail within 60 days of completion of final closure activities.

4.6 Future Transfer Activities

After closure of the synthetic fuel transfer area is completed and the certification of closure submitted to FDEP is approved, the transfer area may be reopened for transfer of synthetic fuels. The transfer area will be operated in accordance with all applicable requirements for transfer facilities.

TABLES

Table 1. Hazardous Substances of Concern

Hazardous Substance
Acetone
Acetonitrile
Butyl Acetate
Carbon Tetrachloride
Dimethyl Formamide
Ethyl Acetate
Ethyl Alcohol
Heptane
Hexane
Isopropyl Alcohol
Lead
Mercury
Methanol
Methyl Acetate
Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Methylene Chloride
n-Propyl Acetate
Pyridine
Selenium
Silver
Toluene
1,1,1-Trichloroethane
Xylene (Total)

FIGURES

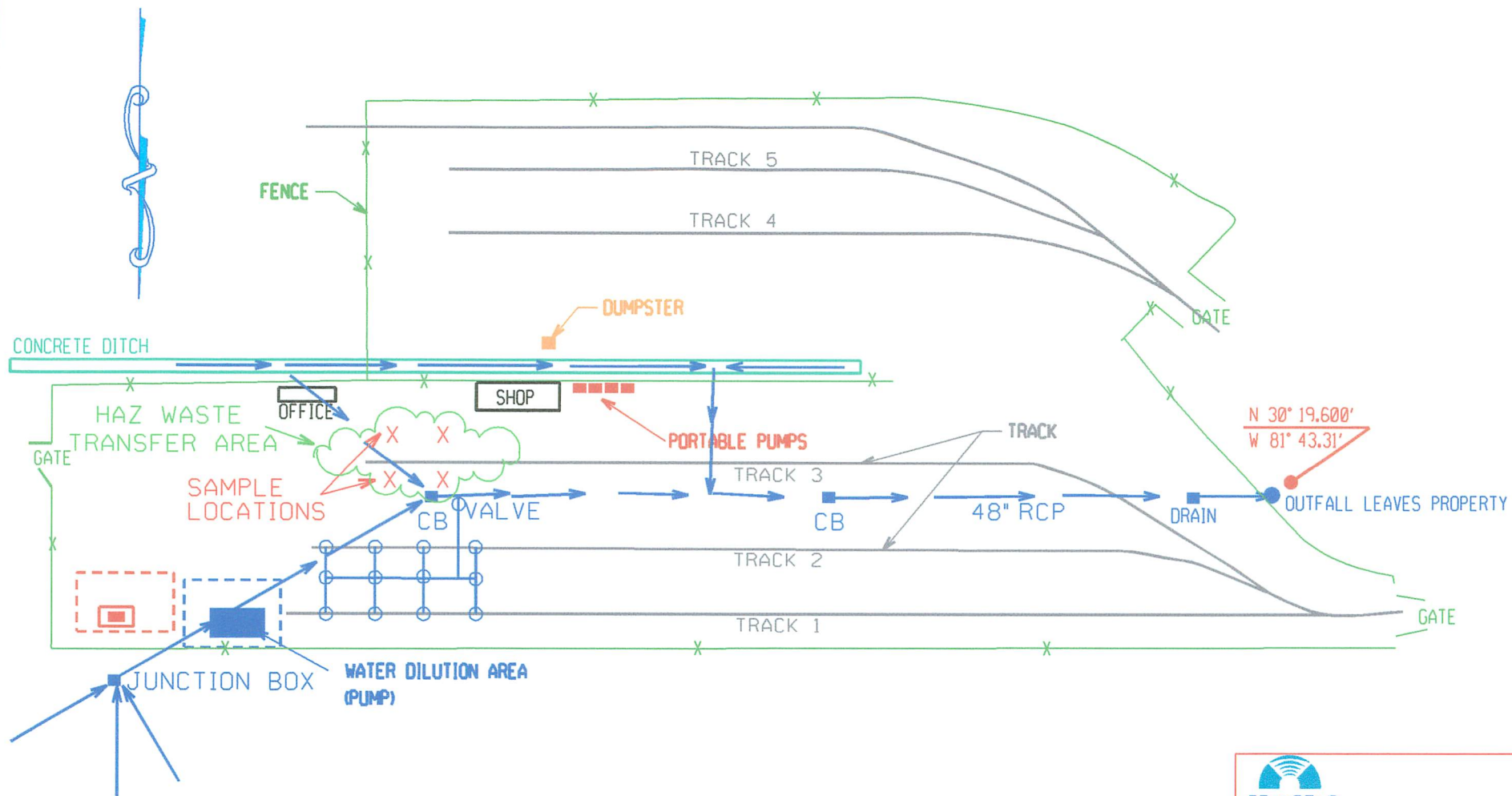



FIGURE 1

MicroStation

 TRANSFLO		
TRANSFLO TERMINAL JACKSONVILLE, FL DUVAL COUNTY		
REGION: SOUTHERN SCALE: AS SHOWN DATE: _____ ENGINEER: _____	VAL. SEC.: _____ _____ _____	DIVISION: JAX DRAWING NO.: _____ SHEET: 1 OF 1

APPENDIX A

Hazardous Waste MSDS

Safety-Kleen Corp.
777 Big Timber Road, Elgin, IL 60123

EMERGENCY ASSISTANCE

For emergency assistance involving chemicals, call Chemtrec
(800) 424-9300

FOR PRODUCT AND SALES INFORMATION

Contact Safety-Kleen Corp., 777 Big Timber Road
Elgin, Illinois 60123 - (708) 697-4502

PRODUCT IDENTIFICATION

Product Name: Hazardous Waste Fuel/
Industrial Furnace Fuel

CAS No.: See Ingredient List.
SKE Code: F2005

Names/Synonyms: Synthetic Fuel, Chemical Based Fuel,
Waste Fuel, Alternative Synthetic Fuel

Hazard Rating (NFPA 704):

Hazard Rating Scale:

Date Issued: 8/92

Supersedes: 3/87

Health : 2

0 = Minimal 3 = Serious

Fire : 3

1 = Slight 4 = Severe

Reactivity : 0

2 = Moderate

Special : None

INGREDIENTS

Component	CAS No.	OSHA PEL	ACGIH TLV	Other Limit	
Water (20-50%)	None	None	None	None	None
Industrial Solvents - Alcohols (20 to 40%):					
Methanol	67-56-1	200	200	None	Flammable,
Ethyl Alcohol	64-17-5	1000	1000	None	Flammable
N-Propyl Alcohol	74-23-8	200	200	None	Flammable
Isopropyl Alcohol	67-63-0	400	400	None	Flammable
N-Butyl Alcohol	74-36-3	50	50	None	Flammable, Irritant
sec-Butyl Alcohol	78-92-2	150	150	None	Flammable
Isobutyl Alcohol	78-83-1	50	50	None	Flammable, Irritant
Tert-Butyl Alcohol	75-65-0	100	100	None	Flammable

Industrial Solvents - Ketones (5 to 10%):

Acetone	67-64-1	750	750	None	Flammable, Irritant
Methyl Ethyl Ketone	78-93-3	200	200	None	Flammable, Irritant
Methyl Isobutyl Ketone	108-10-1	50	50	None	Irritant
Cyclohexyl Ketone	108-84-1	25	25	None	Flammable

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Hazardous Waste Fuel/Industrial Furnace Fuel

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Industrial Solvents - Esters, Ethers and Amides (1 to 10%):

Ethyl Acetate	141-78-6	400	400	None	Flammable
n-Propyl Acetate	109-60-4	200	200	None	Flammable, Irritant
Isopropyl Acetate	108-21-4	250	250	None	Flammable
Butyl Acetate	123-86-4	150	150	None	Flammable, Irritant
Dimethylformamide	68-12-2	10	10	None	OSHA/ACGIH List
2-Methoxyethanol	109-86-4	25	5	None	Flammable
N,N-Dimethylacetamide	127-19-5	10	10	None	OSHA/ACGIH List
Tetrahydrofuran	109-99-9	200	200	None	Flammable

Industrial Aromatic Solvents & Hydrocarbons (5 to 50%):

Toluene	108-88-3	200	100	None	Flammable
Ethyl Benzene	100-41-4	100	100	None	Flammable
Xylene	1330-20-7	100	100	None	Flammable
Mineral Spirits	8052-41-3	500	100	None	Combustible
Hexane	110-54-3	500	500	None	Flammable
Heptane	142-82-5	500	500	None	Flammable

Industrial Chlorinated Solvents (1 to 10%):

Chloroform	67-66-3	2	10	None	OSHA/ACGIH List
Methylene Chloride	75-09-2	500	100	None	OSHA/ACGIH List
1,1,1-Trichloroethane	71-55-6	350	350	None	OSHA/ACGIH List
Trichloroethylene	79-01-6	50	50	None	OSHA/ACGIH List
Perchloroethylene	127-18-4	25	50	None	OSHA/ACGIH List
Fluorocarbons	76-13-1	1000	1000	None	OSHA/ACGIH List

PHYSICAL PROPERTIES

Boiling Point, Deg. F: 130
Melting Point, Deg. F: N/A
Specific Gravity (Water=1): 0.9
Appearance and Odor: Dark, Opaque,
Resinous Liquid - Lacquer Odor

Vapor Pressure, MM HG/20 Deg. C: 50
Vapor Density (AIR=1): 2.5
Water Solubility, %: 0-100
Evaporation Rate (Butyl Acetate=1): Approx. 1.0

FIRST AID MEASURES

If Inhaled: Remove to fresh air. Give artificial respiration if not breathing. Get immediate medical attention.

In Case of Eye Contact: Immediately flush eyes with lots of running water for 15 minutes, lifting the upper and lower eyelids occasionally. Get immediate medical attention.

In Case of Skin Contact: Immediately wash skin with lots of soap and water. Remove contaminated clothing and shoes; wash before reuse. Get medical attention if irritation persists after washing.

If Swallowed: Do not induce vomiting. Get immediate medical attention.

MATERIAL SAFETY DATA SHEET

Hazardous Waste Fuel/Industrial Furnace Fuel

Page 3 of 5
August 28, 1992HEALTH HAZARD INFORMATION**Primary Routes of Exposure:** Inhalation, skin or eye contact.**Inhalation:** Vapors and mists irritate the nose and throat. Inhalation of higher concentrations may cause headaches, nausea, vomiting and coma. Inhalation of very strong concentrations or prolonged exposure may cause unconsciousness or death.**Eye Contact:** Vapors will irritate the eyes. Liquid and mists will irritate and may burn the eyes.**Skin Contact:** May be absorbed through skin. Brief contact may dry the skin. Prolonged or repeated contact may irritate the skin, causing dermatitis.**Swallowed:** Swallowing large quantities causes headaches, nausea, vomiting and perhaps unconsciousness. Swallowing the liquid may result in vomiting. If vomiting occurs spontaneously, do not allow vomitus to be breathed into the lungs, as even a small quantity in the lungs may result in chemical pneumonitis and pulmonary edema/hemorrhage.**Chronic Effects of Exposure:** Prolonged or repeated exposure to high concentrations may cause loss of appetite, nose bleeds and liver, kidney, and renal dysfunction.**Medical Conditions Generally Aggravated by Exposure:** None reported.TOXICITY DATA

No specific toxicity data developed for this mixture.

PERSONAL PROTECTION**Ventilation:** Local mechanical exhaust ventilation capable of maintaining concentrations at the point of use below the weighted average PEL.**Respiratory Protection:** If use conditions generate vapors or mists, use approved respirator appropriate for those emission levels. Appropriate may be a full facepiece or a half mask air-purifying cartridge respirator for organic vapors/mists, a self-contained breathing apparatus in the pressure demand mode, or a supplied air respirator.**Eye Protection:** Chemical goggles. It is generally recognized that contact lenses should not be worn when working with chemicals because contact lenses contribute to the severity of an eye injury.**Protective Clothing:** Long-sleeved shirt, trousers, safety shoes and gloves.**Other Protective Measures:** An eyewash and safety shower should be nearby and ready for use.FLAME AND EXPLOSION INFORMATION**Flash Point, Deg. F:** Less than**Method Used:** FCC**Flammable Limits in Air:****Lower:** 1**Upper:****Extinguishing Media:** Use water spray, dry chemical, alcohol foam or CO₂. Do not use direct water stream.

MATERIAL SAFETY DATA SHEET**Hazardous Waste Fuel/Industrial Furnace Fuel**Page 4 of 5
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Special Fire Fighting Procedures: Firefighters should wear self-contained breathing apparatus and full protective clothing. Use water spray to cool nearby containers and structures exposed to fire.

Unusual Fire and Explosion Hazards: Extinguish all nearby sources of ignition.

HAZARDOUS REACTIVITY**Stability:** Stable**Polymerization:** Will not occur.**Conditions to Avoid:** Heat, sparks and open flames.**Materials to Avoid:** Acids, oxidizing materials.

Hazardous Decomposition Products: May liberate carbon monoxide, carbon dioxide, hydrogen chloride, chlorine and phosgene.

SPILL, LEAK AND DISPOSAL PROCEDURES

Action to Take for Spills or Leaks: Wear protective equipment including rubber boots, rubber gloves, rubber apron and a self-contained breathing apparatus in the pressure demand mode or a supplied air respirator. If the spill or leak is small, a full escape air purifying cartridge respirator equipped for organic vapors may be satisfactory. In any event, always wear eye protection. Extinguish all ignition sources and ensure that all handling equipment is electrically grounded. For small spills or drips, mop or wipe up and dispose of in DOT-approved waste containers. For large spills, contain by diking with soil or other non-combustible absorbent materials and then pump into DOT-approved waste containers or absorb with non-combustible absorbent material and place the residue in DOT-approved waste containers. Keep out of sewers, storm drains, surface waters and soil. Comply with all applicable governmental regulations on spill reporting and handling and disposal.

SPECIAL PRECAUTIONS

Storage and Handling Precautions: Keep away from heat, sparks and flames. Store in a cool, dry, well-ventilated place away from incompatible materials. Ventilate frequently, and more often in warm weather, to relieve pressure. Electrical equipment when handling this product and use only non-sparking tools. Keep container tightly closed when not in use. Do not use pressure to empty container. Wash thoroughly after handling. Do not get in eyes, on skin or on clothing.

Repair and Maintenance Precautions: Do not cut, grind, weld or drill on or near this material.

Other Precautions: Vapors of this product are heavier than air and will collect in low places, such as pits or degreasers or other poorly ventilated areas. Do not enter places where vapors are suspected unless special respiratory protection is worn and observer is present.

FOR ADDITIONAL INFORMATION

Contact J.W. Hermann, (312) 694-2700, Extension 7341.

NOTICE

All information, recommendations and suggestions appearing herein concerning this product are based upon data obtained from the manufacturer and/or recognized technical sources. However, Safety-Kleen Corp. (SK), makes no warrant representation or guarantee as to the accuracy, sufficiency or completeness of the material set forth herein. It is the user's responsibility to determine the safety, toxicity and suitability of his own use, handling and disposal of the product. Additional product literature may be available upon request. Since actual use by others is beyond our control, no warranty, express or implied, is made by SK as to the effects of such use, the results to be obtained or the safety and toxicity of the product, nor does SK assume any liability arising out of use by others of the product referred to herein. The data in this MSDS relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process.

END OF MSDS

APPENDIX B

SAMPLING AND ANALYSIS PLAN

SAMPLING AND ANALYSIS PLAN

These sampling and analysis procedures are designed to ensure the integrity of the sampling and testing for the clean closure of the hazardous waste transfer area at the TRANSFLO facility.

As described in Section 4 of the closure plan, closure will include decontamination of the asphalt, rail, and rail road ballast, if necessary, with a non-alcohol based detergent wash followed by a rinse using hot water or steam. The wash and rinse water will be collected and stored separately.

All sampling will be conducted with an approved NELAP. During final rinse, grab samples will be collected. Samples will be analyzed for the target parameters, defined by the constituents of any hazardous wastes handled by the transfer facility obtained from sources including MSDSs and hazardous waste materials listed in Table 1. Duplicate samples will also be collected for quality assurance testing. Before sample collection, sample containers will be labeled. Labeling information will include sample number, description of contents, date, sampler's name, and analytical testing requirements. Samples of the rinse water will be collected by submerging a bailer or other appropriate sampling device into the collected rinse water and immediately filling the pre-labeled sampling containers. Samples of the surface water and/or groundwater will be collected by submerging a bailer or other appropriate sampling device into a well or open pit and immediately filling the pre-labeled sampling containers. Soil samples will be collected in a glass jar. Field personnel will note the sample location and description (e.g., rinse water from asphalt), and the associated sample number in the field notebook. All samples will be transported with chain-of-custody documentation to the laboratory in sealed, iced coolers.

Samples will be analyzed at a state certified laboratory with an approved NELAP, using the following EPA methods:

- Regulated solvent scans - 8015
- Volatile organics - 8260
- Semivolatile organics -8270

All laboratory data will be validated using standard EPA assurance protocols. The validated data will then be compared to action levels listed in Table 1 of the closure plan to determine whether additional decontamination steps need to be taken.