Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com] Sent: Monday, December 13, 2010 10:57 AM

To: **Epost HWRS**

RE: Notice of Intent to Issue Permit Modification Subject:

Received.

Jeff Curtis

EHS Manager, Florida Safety-Kleen Systems, Inc. Office: (561) 738-3026 Cell: (561) 523-4719 Fax: (561) 731-1696 jeff.curtis@safety-kleen.com www.safety-kleen.com

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]

Sent: Friday, December 10, 2010 4:25 PM

To: Curtis, Jeff

Cc: Echevarria, Edgar; donald.forsberg@dep.state.fl.us; Kantor, Karen E.; Winston, Kathy; knight.karen@epamail.epa.gov; maryann.poole@myfwc.com; heath_rauschenberger@fws.gov;

mayor@townofmedley.com; DennisMoss@miamidade.gov; Schoepke, Robert; rstebnisky@ectinc.com; Bahr, Tim; Tripp,

Anthony; Kothur, Bheem; Russell, Merlin

Subject: Notice of Intent to Issue Permit Modification

This e-correspondence is being sent to replace the e-correspondence sent earlier today which contained errors due to a PDF conversion problem. Please delete that earlier document and replace with this one. Thank you.

We ask that you verify receipt of this document by sending a "reply" message to epost hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

> Tim Bahr Environmental Administrator Hazardous Waste Regulation Department of Environmental Protection

E-Mail Address: epost_hwrs@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few

minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.	ſ
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Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Mimi A. Drew Secretary

December 10, 2010

Sent Via E-mail

Jeff.Curtis@safety-kleen.com

Mr. Jeff Curtis Environmental Health & Safety Manager Safety-Kleen Systems, Inc. 8755 Northwest 95th Street Medley, Florida 33178

SUBJECT: Safety-Kleen Systems, Inc.

FLD 984 171 694

Operating Permit 56019/HO/007

Miami-Dade County

Dear Mr. Curtis:

The purpose of this letter is provide Notice of Intent to Issue a Permit Modification for your facility located at 8755 Northwest 95th Street, in Medley, Miami-Dade County, Florida, specifically for implementing corrective action requirements under the Department's authorized program for implementing/continuing the federal Hazardous and Solid Waste Amendments (HSWA). The revised pages of your operating permit are attached. Please review the attached documents and ensure publication and broadcast within the time allotted.

If you have any questions or would like to discuss this matter, please contact Merlin D. Russell Jr. at (850)245-8796.

Sincerely,

Tim J. Bahr, Administrator Hazardous Waste Regulation

TJB/mdr

Enclosures

cc via e-mail (with enclosures):

Mr. Jeff Curtis December 10, 2010 Page Two

Edgar Echevaria, FDEP, <u>Edgar.Echevarria@dep.state.fl.us</u>
Donald Forsberg, DEP/Fort Myers <u>Donald.forsberg@dep.state.fl.us</u>
Karen Kantor, FDEP WPB, <u>Karen.E.Kantor@dep.state.fl.us</u>
Karen Knight, EPA/Region 4 <u>knight.karen@epamail.epa.gov</u>
Mary Ann Poole, Florida Fish and Wildlife Conservation Commission <u>maryann.poole@myfwc.com</u>

Heath Rauschenberger, U.S. Fish & Wildlife Service heath-rauschenberger@fws.gov Robert Schoepke, Safety Kleen, Robert.Schoepke@safety-kleen.com Rick Stebnisky, ECT, RStebnisky@ectinc.com Kathy Winston, FDEP WPB, Kathy.Winston@dep.state.fl.us



STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application for a Permit Modification by:

Safety-Kleen Systems, Inc. 8755 Northwest 95th Street Medley, Florida 33178 DEP File No.: 56019/HO/007 Miami-Dade County

INTENT TO ISSUE

The Florida Department of Environmental Protection ("the Department") gives notice of its intent to issue a permit modification (copy enclosed) for the proposed project as detailed in the application specified above, for the reasons stated below.

On October 4, 2010, the applicant, Safety-Kleen Systems, Inc., applied to the Department, for a **Error! Reference source not found.** to implement corrective action at Safety-Kleen Systems, Inc.'s site at Medley, Florida. The Remedial Action Plan had been supplied on August 09, 2010.

The Department has permitting jurisdiction under Section 403.722, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-730. The project is not exempt from permitting procedures. The Department has determined that an operating permit modification is required for the proposed work. The Department intends to issue the **Error! Reference source not found.** with the conditions included in the enclosed draft.

Pursuant to Sections 403.722 and 403.815, F.S. and Rule 62-730.220, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Newspaper Notice, and to broadcast over a local radio station the enclosed Radio Announcement. The notice shall be published one time only within 30 days in the legal ad section of a daily, major newspaper of general circulation in the area affected. The newspaper must contain at least 25 percent of its words in the English language, be for sale to the public generally, be available to the public generally for the publication of official or other notices and customarily contain information of a public character or of interest or of value to the public. The newspaper must have been in existence for one year, unless no such newspaper exists in the affected area (See Sections 50.011 and 50.031, F.S.). Where there is more than one daily newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Office of General Counsel of the Department at (850) 245-2242. The applicant shall provide proof of publication to the Department of Environmental Protection at 2600 Blair Stone Road, Mail

Station #4560, Tallahassee, Florida 32399-2400; Attention: Administrator, Hazardous Waste Regulation Section, within 14 days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit modification.

The Radio Announcement shall be broadcast one time only within 30 days on a licensed commercial radio station of sufficient power to be clearly received in the area that may be affected by the permit. **Broadcast of the notice shall occur between 8:00 a.m. and 10:00 p.m.** The applicant shall provide proof of broadcast to the Department of Environmental Protection, 2600 Blair Stone Road, Mail Station #4560, Tallahassee, Florida 32399-2400; Attention: Administrator, Hazardous Waste Regulation Section, within 14 days of the broadcast. Failure to broadcast the announcement and provide proof of the broadcast within the allotted time may result in the denial of the **Error! Reference source not found.**

The Department will issue the operating permit modification with the attached conditions unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or all parties reach a written agreement on mediation as an alternative remedy under Section 120.573, F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth in the enclosed Newspaper Notice. The administrative rights explained in the enclosed Newspaper Notice apply to you, as applicant and Permittee. Your 45-day period for requesting an administrative hearing begins on the date you receive this Intent.

If you should have any questions please c	all Merlin D.	Russell Jr.	at (850)	245-8796.
Executed in Tallahassee, Florida, on this	day	of	, 2	2010.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Charles F. Goddard, Chief Bureau of Solid & Hazardous Waste 2600 Blair Stone Road, M.S. 4550 Tallahassee, Florida 32399-2400

Charle 8. Goddanf

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk (or Deputy Clerk)

<u>December 10, 2010</u>

Date

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF INTENT TO ISSUE

THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION (FDEP) GIVES NOTICE OF ITS INTENT TO ISSUE AN OPERATING PERMIT MODIFICATION UNDER SECTION 403.722, FLORIDA STATUES (F.S) AND CHAPTERS 62-4 AND 62-730, OF THE FLORIDA ADMINSTRATIVE CODE (F.A.C) to Safety-Kleen Systems, Inc. with respect to Safety-Kleen Systems, Inc. at 8755 Northwest 95th Street, Medley, Florida, having assigned facility I.D. number FLD 984 171 694.

The draft RCRA Operating Permit Modification, contains the modifications for Operating Permit 56019/HO/007. The **Error! Reference source not found.** is intended to be issued to Safety-Kleen Systems, Inc. at Safety-Kleen Systems, Inc.'s site at Medley, Florida. The selected remedy for AOC A (Alpha Area) can be found in the application.

Copies of the application and the draft **Error! Reference source not found.** are available for public inspection during normal business hours 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at FDEP, West Palm Beach District Office, 400 North Congress Avenue, West Palm Beach, Florida 33401, (561) 681-6600 and at Division of Waste Management, Bureau of Solid & Hazardous Waste (BSHW), Bob Martinez Center, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, (850) 245-8796. Electronic copies of the application and draft **Error! Reference source not found.** can be accessed in the Department's OCULUS data system located at http://dwmedms.dep.state.fl.us/Oculus/servlet/login

A person whose substantial interests are or will be affected by the Intent to Issue may petition for an administrative determination (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in FDEP's Office of General Counsel, Agency Clerk, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant and any parties entitled to written notice under Section 120.60(3), F.S. must be filed within 45 days of receipt of the Intent. Petitions filed by any other persons must be filed within 45 days of publication of this notice or receipt of the Intent, whichever occurs first. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within this time period shall constitute a waiver of that person's right to request a hearing under Sections 120.569 and 120.57, F.S. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which FDEP's action is based must contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the FDEP Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of FDEP's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by FDEP's proposed action; (d) A statement of all material facts disputed by petitioner, or a statement that there are no disputed facts; (e) A statement of facts which petitioner contends warrant reversal or modification of FDEP's proposed action; (f) A statement of which rules or statutes the petitioner contends require reversal or modification of FDEP's proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the proposed action.

A petition that does not dispute the material facts on which FDEP's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that FDEP's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the FDEP have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any person may request a public meeting regarding the proposed permitting decision pursuant to Section 403.722(10), F.S. A request for a public meeting is not equivalent to a request for a formal or informal administrative hearing. Public meetings are not evidentiary in nature, and information submitted at a public meeting is for non-binding consideration only. A public meeting is not subject to court or appellate review. A request for a public meeting must be filed (received) in the Office of General Counsel Agency Clerk, within 45 days of publication of this notice. Failure to file a request for a public meeting within this time period shall constitute a waiver of any right such a person may have to request a meeting under Section 403.722(10), F.S.

Mediation is not available in this proceeding.

Radio Announcement:

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF INTENT TO ISSUE PERMIT

The Florida Department of Environmental Protection gives notice that it has determined to issue a **Error! Reference source not found.** to Safety-Kleen Systems, Inc.. The **Error! Reference source not found.** authorizes Safety-Kleen Systems, Inc. to operate a hazardous waste container and tank storage facility, a used oil storage facility and implement corrective action requirements at a facility located at 8755 Northwest 95th Street, Medley, Florida.

A person who is or will be substantially affected by the Department's proposed permitting decision may file a petition for an administrative hearing in accordance with Sections 120.569 and 120.57, Florida Statutes. Any person may request a public meeting pursuant to Section 403.722(10), Florida Statutes. A petition for an administrative hearing or a request for a public meeting must be filed with the Agency Clerk, Office of General Counsel within forty-five days of this announcement.

Mediation is not available in this proceeding.

For more information concerning requirements of the petitioning process and the necessary time frames for filing a petition, submitting comments or requesting a public meeting, or obtaining a copy of the permit, please contact the Office of General Counsel in Tallahassee at (850) 245-2242, or 3900 Commonwealth Blvd, MS 35, Tallahassee, FL 32399.

ID NUMBER: FLD 984 171 694

PERMIT/CERTIFICATION NUMBER: 56019/HO/007

EXPIRATION DATE: March 19, 2013

Container Storage:

The container storage area is a 22 feet by 32 feet area with a sloped floor leading to a collection sump. A maximum of 6,912 gallons of hazardous waste will be stored in this area at any one time (See Attachment D).

Non-container Storage:

Safety-Kleen has registered as a used oil and used oil filter transporter and transfer facility in accordance with Chapter 62-710, F.A.C.

Spent antifreeze is stored in a tanker truck, and later picked up by a recycler for processing into pure product for sale.

Safety-Kleen has registered as a transporter and storer of mercury containing lamps and devices that are regulated in accordance with Chapter 62-737, F.A.C. A maximum of 2,000 kilograms of mercury containing lamps and devices destined for recycling may be stored and managed in compliance with Rule 62-737.400, F.A.C.

Six solid waste management units (SWMU's) and one Area of Concern (AOC) have been identified at the facility. Additional information on the units identified below is included in Appendix A of this permit.

- SWMU-1 Container Storage/ Waste Transfer Area
- SWMU-2 Above Ground Storage Tanks
- SWMU-3 Return/Fill Area
- SWMU-4 Mercury Lamps Storage Area
- SWMU-5 Used Antifreeze Tanker
- SWMU-6 Used Oil Filter/Antifreeze Storage
- AOC-A Alpha Area

The Permittee is required to investigate any releases of hazardous waste or hazardous constituents at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. Solid waste management units (SWMUs) and areas of concern (AOCs) identified to date are listed in Appendix A. Pursuant to 40 Code of Federal Regulations (CFR) 260.10 [as adopted by reference in Rule 62-730.020(1), F.A.C.], the corrective action requirements of this RCRA permit extend to all contiguous property under the control of the Permittee (see Attachment A, a map which demarks the property boundaries of land under the Permittee's control) and to all contamination that originated from discharges at the contiguous property under control of the Permittee.

ID NUMBER: FLD 984 171 694

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EXPIRATION DATE: March 19, 2013

This permit is based on the premise that information and reports submitted by the Permittee prior to issuance of this permit are accurate. Any inaccuracies found in this information or information submitted as required by this permit may be grounds for termination or modification of this permit in accordance with Rule 62-730.290, F.A.C and potential enforcement action.

Compliance with this RCRA permit constitutes compliance for purposes of enforcement with Subtitle C of RCRA, except for those requirements not included in the permit which become effective by statute; are promulgated under 40 CFR Part 268 restricting placement of hazardous waste in or on the land; or are promulgated under 40 CFR Part 264 regarding leak detection systems for new and replacement surface impoundments, waste piles, and landfill units, and lateral expansions of surface impoundments, waste piles, and landfill units, as specified in 40 CFR 270.4. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3008(a), 3008(h), 3004(v), 3008(c), 3007, 3013 or Section 7003 of RCRA, Sections 104, 106(a), 106(e), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 *et seq.*, commonly known as CERCLA), or any other law providing for protection of public health or the environment.

The facility is located at 8755 Northwest 95th Street, Medley, Florida, 33178.

The following documents were used in the preparation of this permit:

- 1. HSWA permit number FLD 984 171 694 issued by EPA on February 12, 1993.
- 2. Operating permit number HO 13-307336 issued by DEP on March 19, 1998 and modified on August 31, 1998.
- 3. Operating permit renewal application filed on DEP Form 62-730.900(2) and received on September 3, 2002.
- 4. Additional information submitted on December 18, 2002.
- 5. Permit application modification request, including a Used Oil Processing Facility application, dated May 24, 2004.
- 6. Permit application renewal request dated September 19, 2007.
- 7. First Notice of Deficiency Letter dated November 19, 2007.
- 8. Response to First Notice of Deficiency Letter dated February 7, 2008.
- 9. Site Assessment Report, Safety Kleen Systems, Inc., 8755 NW 95th Street, Medley, Florida, dated April 2010.

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10. Remedial Action Plan, Safety Kleen Systems, Inc., Medley, Florida, dated August 9, 2010.

11. RCRA Facility Assessment Addendum, Department of Environmental Protection, November 17, 2010.



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PART VI – REMEDY SELECTION AND IMPLEMENTATION

Part VI Subpart A - General Conditions

- 1. A remedy shall be selected from the remedial alternatives evaluated in accordance with Chapter 62-780, F.A.C.
- 2. Within 30 days of Department approval of the remedial alternative selected, the Permittee shall publish notice of a proposed permit modification in accordance with Rule 62-730.292(3)(c), F.A.C. This modification will serve to incorporate a final remedy, including a Corrective Action Management Unit (CAMU) if necessary, into this permit. Final approval of remedial action which is achieved through interim measures shall be in accordance with this condition.
- 3. Any remedial action plan shall include a provision for the Permittee to submit a periodic Corrective Action Effectiveness Report.
- 4. When site rehabilitation is complete, the Permittee shall submit to the Department a Site Rehabilitation Completion Report in accordance with Chapter 62-780, F.A.C.
- 5. For site rehabilitation involving the cleanup of groundwater contaminated by a release from a regulated unit, the Permittee must demonstrate that the concentration of constituents of concern remain below cleanup goals for three consecutive years after active remediation has ceased.

Part VI Subpart B - Selected Remedies

AOC A-Alpha Area

- 1. The Permittee shall implement the Remedial Action Plan dated August 9, 2010.
- 2. The Permittee shall use its August 17, 2009 Sampling & Analysis Plan (SAP) for implementation of the RAP.
- 3. The Permittee must notify the Department at least one calendar week prior to performing field activities as required by Rule 62-780.220 (Notices), F.A.C.
- 4. The Permittee shall be required to implement the following changes to the RAP:
 - 1. A Remedial Action Status Report (RASR) shall be submitted semiannually. The first semi-annual report will be due 180 days after permit issuance.
 - 2. The deep groundwater monitoring wells must be sampled prior to startup and during the final groundwater sampling event. If either sampling event identifies contaminants in the perimeter wells, additional assessment, monitoring and/or corrective action may be required.

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- 3. The parameters for groundwater monitoring (RAP Table 5) must also include pH, specific conductivity, dissolved oxygen and temperature.
- 5. When site rehabilitation (remedial action) is complete, the Permittee shall submit to the Department a Site Rehabilitation Completion Report in accordance with Chapter 62-780, F.A.C. Site Rehabilitation Completion Reports can be part of a combined document with the Remedial Action Status Report.
- 6. The Department will approve completion of site rehabilitation by inclusion in a permit renewal, permit modification, or separate Site Rehabilitation Completion Order.

APPENDIX A SUMMARY OF FACILITY SITES

(SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN)

	Confirmatory Samp	ung:	
SWMU/AOC	SWMU/AOC Co	Dates of	
Name	Basis for Deter	Operation	
tified as requiring	Confirmatory Sampl	ing at this time	pursuant to this
•	· ·	/k/a RCRA Fa	cility
SWMU/AOC	SWMU/AOC	Dates of	Potentially
Name	Comment	Operation	Affected Media
tified at this time a	as requiring a Site As	sessment.	
			Attenuation with
SWMU/AOC	Dates of Op	Potentially	
Name			Affected Media
1	Name tified as requiring a AOCs requiring a SWMU/AOC Name tified at this time a AOCs requiring a (a/k/a Corrective SWMU/AOC	Name Basis for Determined as requiring Confirmatory Sample AOCs requiring a Site Assessment (a SI) or a Risk Assessment): SWMU/AOC SWMU/AOC Comment tified at this time as requiring a Site Astermined at this time as requiring a Remedial Action P (a/k/a Corrective Measures Study [COMMU/AOC Dates of Op	Name Basis for Determination tified as requiring Confirmatory Sampling at this time AOCs requiring a Site Assessment (a/k/a RCRA Fa T] or a Risk Assessment): SWMU/AOC Name Comment Operation tified at this time as requiring a Site Assessment. AOCs requiring a Remedial Action Plan or Natural (a/k/a Corrective Measures Study [CMS]): SWMU/AOC Dates of Operation

ID NUMBER: FLD 984 171 694

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with Monitoring P	OCs <u>implementing</u> a Re lan (a/k/a Corrective M			or Natural Attenuation S]):		
SWMU/AOC	SWMU/AOC	Dates of		Potentially Affected		
Number/Letter	Name	Operatio	n	Media		
AOC A	Alpha Area	unknown		Soil and groundwater		
A.5. List of SWMUs/A(without controls ha		bilitation Con	npletio	n Determinations		
SWMU/AOC	SWMU/AC	OC .	Uni	Unit Comment and Basis for		
Number/Letter	Name			NFA		
	fied at this time at which controls have been made.		ation C	Completion		
A.6. List of SWMUs/AC controls have been	OCs at which Site Rehalmade:	bilitation Con	npletio	n Determinations with		
SWMU/AOC	SWMU/A0	OC	Uni	nit Comment and Basis for		
Number/Letter	Name			NFA		
			+			
There are no units identi: Determinations with con		Site Rehabilit	ation C	ompletion		
Determinations with con A.7. List of SWMUs/AC	trols have been made.	Action Deter				
Determinations with con A.7. List of SWMUs/AC	trols have been made. OCs Where No Further	Action Determination:	minati			
A.7. List of SWMUs/AC based on no suspec	OCs Where No Further ted or confirmed contains	Action Determination: OC Area/Waste	minati	ons have been made t Comment and Basis for		
A.7. List of SWMUs/AC based on no suspect SWMU/AOC Number/Letter	OCs Where No Further ted or confirmed container Storage*	Action Determination: OC Area/Wasterea	Unit	ons have been made t Comment and Basis for NFA		
A.7. List of SWMUs/AC based on no suspect SWMU/AOC Number/Letter SWMU 1	Container Storage* A	Action Determination: OC Area/Waste rea	Unit Febru	comment and Basis for NFA hary 12, 1993 HSWA permit		
A.7. List of SWMUs/AC based on no suspect SWMU/AOC Number/Letter SWMU 1	Container Storage* Above Ground Storage Above Ground Storage*	Action Determination: OC Area/Waste rea age Tanks*	Unit Febru Febru Febru	t Comment and Basis for NFA ary 12, 1993 HSWA permit		
A.7. List of SWMUs/AC based on no suspect SWMU/AOC Number/Letter SWMU 1 SWMU 2 SWMU 3	Container Storage* Above Ground Storage Return/Fill A	Action Determination: DC Area/Waste rea age Tanks* Area orage Area	Unit Febru Febru RFA	comment and Basis for NFA Eary 12, 1993 HSWA permit Eary 12, 1993 HSWA		
A.7. List of SWMUs/AC based on no suspect SWMU/AOC Number/Letter SWMU 1 SWMU 2 SWMU 3 SWMU 4	Container Storage* Above Ground Stora Return/Fill A Mercury Lamps Sto	Action Determination: DC Area/Waste rea age Tanks* Area Drage Area Tanker	Unit Febru Febru RFA RFA	comment and Basis for NFA hary 12, 1993 HSWA permit hary 12, 1993 HSWA permit hary 12, 1993 HSWA permit hary 12, 1993 HSWA permit hary 12, 1993 HSWA permit Addendum, November 17, 2010 Addendum, November 17,		