Perma-Fix®
environmental services

May 4. 2010

RE: Response to Warning Letter OWL-HW-E-10-004
Issued to Perma-Fix of Orlando (FLD 980 559 728)

Dear Ms. Kramer:

In response to the Warning Letter received on 4/5/2010, I have compiled the information requested by the department. With this letter I am submitting the following information:

- A roster of training conducted at Perma-Fix of Orlando conducted on April 23, 2010;
- An outline detailing the content of the training including waste profiling, recognizing hazardous waste, labeling and container management;
- A standard operating procedure (SOP-002T, Inbound Waste Receipt) for shipment inspection including manifest quality assurance review;
- An updated facility Contingency Plan;
- An updated facility SPCC Plan;
- Updated job descriptions with training requirements.

If you have any questions regarding this information, please feel free to call me at (352) 395-1356 or e-mail me at kfogleman@perma-fix.com.

Sincerely,

Kurt Fogleman
Environmental, Health and Safety Manager
Perma-Fix of Southeast Region

1000 Rocket Boulevard Orlando, FL 32824

Response to FDEP Warning Letter OWL-WH-E-10-004

Perma-Fix of Orlando Facility
10100 Rocket Blvd
Orlando, FL 32824

Prepared by

Kurt Fogleman
Environmental Health and Safety Manager
Perma-Fix Southeast Region
1940 NW 67th Place
Gainesville, FL 32653
(352) 395-1356

Training Conducted at Perma-Fix of Orlando

Training Roster

Training Sign In Roster

Course Name: Hazardous Waste Profiling, Management and Labeling	Start Time: 12:30
Instructor: Kurt Fogleman	Finish Time:
Training Date: 23 APR 2010	SOP Revision No:

If your name cannot be read. You will not receive proper credit for attending.

Name: *Please Print Legibly*	***Signature:***	***Time***	***Notes / Comments***
Jesus M. Rivas		1230	
Rob Boal		1230	
John MacDonald		1230	
Cory J. Howard		12:30	
MIKE IANNACCONE		12:30	
SERGIO Dominguez		12.30	

QA Use Only:	Date entered into individual training records:	Entered by Andy Owens: QA Manager Signature:

Training Outline
(Presentation Slides)

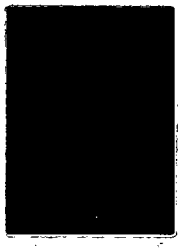
Hazardous Waste Training

Perma-Fix of Orlando

April 23, 2010

Corrective Action

FDEP Inspection
January 25, 2010



Inspection Results

- Facility was inspected on January 25
- FDEP discovered problems with labeling
- FDEP identified issues with waste characterization
- FDEP found incorrect information on manifests

Potential Violations and Corrective Actions

40 CFR 263.20(c)

- A hazardous waste manifest must accompany hazardous waste during transportation
- Thinner from The Recovery Room and distillation bottoms from Reed Nissan were transported without a manifest.

40 CFR 263.20(c)

Corrective Action:

- Training will be provided on:
  - Recognizing potential hazardous wastes
  - Verifying that waste matches the waste profile

40 CFR 263.20(h)(2)

A transporter of hazardous waste records the following for each shipment in a log or on a shipping paper:

- Generator name, address and EPD ID
- Quantity of waste accepted
- Date of acceptance

40 CFR 263.20(h)(2)

Corrective Action:

- Training will be provided on procedures for manifest quality review
- Perma-Fix will ensure correct EPA ID numbers are included on manifests

40 CFR 262.34(a)(2)

- Accumulation date must be clearly marked and visible on each container
- Chemo consolidation container was not marked with the date

40 CFR 262.34(a)(2)

Corrective Action:

- Training will be provided on waste labeling
- Perma-Fix will immediately label containers with accumulation start date

40 CFR 262.34(a)(3)

- "Hazardous Waste" must be clearly marked and visible on each container
- Photo fixer waste was not labeled as hazardous waste

40 CFR 262.34(a)(3)

Corrective Action:

- Training will be provided on waste labeling
- Perma-Fix will immediately label containers with appropriate labels

40 CFR 264.13(a)(1)

- TSDFs must obtain detailed chemical and physical analysis of wastes to be accepted at the facility
- Some wastes identified during the inspection did not match profile description

40 CFR 264.13(a)(1)

Corrective Action:

- Training will be provided on:
  - Recognizing potential hazardous wastes
  - Verifying that waste matches the waste profile

40 CFR 264.31

- TSDFs must operate in a manner to minimize fire, explosion or release of hazardous material
- Incorrect identification of waste may lead to improper handling
- Improper handling may lead to reactions with incompatibles

40 CFR 264.31

Corrective Action:

- Training will be provided on:
  - Recognizing potential hazardous wastes
  - Verifying that waste matches the waste profile

Regulations

- 40 CFR 263.20(c)
- 40 CFR 263.20(h)(2)
- 40 CFR 263.34(a)(2)
- 40 CFR 263.34(a)(3)
- 40 CFR 264.31

40 CFR 263.20(c)

"The transporter must ensure that the manifest accompanies the hazardous waste."

40 CFR 263.20(h)(2)

"The transporter records, on a log or shipping paper, the following information for each shipment:

(i) The name, address, and U.S. EPA Identification Number of the generator of the waste;

(ii) The quantity of waste accepted;

(iii) All DOT-required shipping information;

(iv) The date the waste is accepted"

40 CFR 262.34(a)(2)

A generator may store hazardous waste in a container provided that "the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container"

40 CFR 262.34(a)(3)

"While being accumulated on-site, each container and tank is labeled or marked clearly with the words, Hazardous Waste"

40 CFR 264.31

"Facilities must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment."

Training Topics

- Waste characterization
- Waste management
- Manifest quality assurance

Waste Characterization

- Recognizing potential hazardous wastes
- Verifying that waste matches the waste profile

Waste Characterization

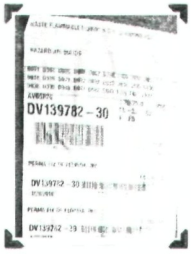
- Recognizing hazardous wastes:
  - Does the waste fail screening procedures?
  - Is there any labeling that is inconsistent with the profile?

Waste Characterization

- Recognizing hazardous wastes:
  - What is wrong with this picture?

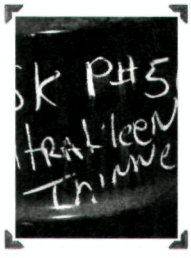
Waste Characterization

- Recognizing hazardous wastes:
  - One label says "Non-Hazardous Waste"
  - ID sticker says "Hazardous Solids"



Waste Characterization

- Other examples:
  - Ultrakleen Thinner from inspection



Waste Profile Process

- Profile process determines regulatory status of waste
  - Hazardous waste codes
  - DOT description

Waste Profile Process

- Waste evaluation documents provide information on waste characteristics
  - Waste profile form
  - MSDS
  - Analytical reports

Waste Profile Process

- Waste profile form
  - Chemical characteristics
  - Physical characteristics
  - Sufficient for pure discarded products that the facility has handled before and has the MSDS on file

Waste Profile Process

- MSDS
  - Required for discarded products when MSDS not in facility files
  - Required for each constituent in a mixture of products
  - Required for media contaminated with product(s)

Waste Profile Process

- Analytical reports
  - Required if there is a need to verify concentrations of regulated constituents
  - Required to establish presence or absence oh hazardous constituents

Waste Profile Process

- What are the requirements for pure sulfuric acid product that is discarded?
  - Profile only. MSDS if one is not on file.

Waste Profile Process

- What are the requirements for sulfuric acid product that is mixed with hydrochloric acid and discarded?
  - Profile with MSDS for both constituents.

Waste Profile Process

- What is the requirement for soil contaminated with acetone?
  - Profile with MSDS for acetone.

Waste Profile Process

- What is required for a mystery drum?
  - Profile with analytical report establishing presence of hazardous constituents.

Waste Profile Process

- Waste verification
  - Waste for storage is verified by comparing DOT labeling to waste profile
  - Waste for consolidation is evaluated by compatibility test methods

Waste Management

- Hazardous waste labeling
- Hazardous waste accumulation
- Preventing incompatibility and reaction

Waste Management

Hazardous waste labeling

- "Hazardous Waste"
- Accumulation start date

Waste Management

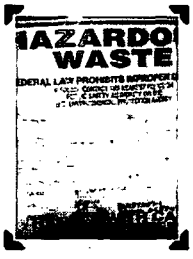
Hazardous waste labeling

- Responsibility of generator to label container with accumulation start date
- Accumulation start date is the date waste is first placed in a container

Waste Management

Hazardous waste labeling

- Chemo container from consolidation did not have accumulation start date



Waste Management

Preventing incompatibility and reaction

- If waste is not properly characterized or does not match the waste profile, it could lead to reactions due to incompatibilities

Waste Management

Preventing incompatibility and reaction

- Waste is placed in storage or consolidated based on DOT category, waste codes and chemical characteristics
- If this information is incorrect, reactions could occur

Waste Management

Preventing incompatibility and reaction

- Look for the following:
  - Inconsistent labeling
  - DOT labels inconsistent with profile
  - Chemical names on containers that conflict with profile

Manifest Quality Assurance

- Verify that manifest matches inbound shipment according to SOP (Inbound Waste Receipt)

Manifest Quality Assurance

- Verification includes:
  - Comparison of containers on manifest to containers on load
  - Match approval codes on manifest to waste profiles
  - Comparison of description of waste on container to manifest description

Manifest Quality Assurance

- Verification includes:
  - Inspection of hazardous waste label
  - Comparison of container type and count to manifest
  - Comparison of waste codes and DOT description to check-in sheet

Manifest Quality Assurance

- Verification includes:
  - Review of manifest to ensure it meets FAC 62-730.160 and 40 CFR 262 requirements
  - Resolution of discrepancies with generator

Manifest Quality Assurance

- Regulatory requirements:
  - Ensure name, address and EPA ID number of the generator are correct
  - Ensure transporter information is correct
  - Ensure PFO is listed as designated or alternate facility

Manifest Quality Assurance

- Regulatory requirements:
  - Ensure DOT description is correct and matches profile
  - Ensure type, quantity and weight of containers are all correct
  - Ensure waste codes are correct and match profile

Manifest Quality Assurance

- Regulatory requirements:
  - Ensure generator certification is complete
  - Record discrepancies in block 18
  - Complete receiving facility information

Manifest Quality Assurance

- ☐ Please make sure that all EPA ID numbers are correct.

Procedure for Inbound Waste Receipt

(Including Manifest Quality Assurance Review)

PREPARED BY: _____ **DATE:** 5/3/2010
KURT FOGLEMAN, ENV. HEALTH & SAFETY MGR.

APPROVED BY: _____ **DATE:** 5-3-2010
CORY HOWARD, FACILITY MANAGER

TABLE OF CONTENTS

1.0 PURPOSE

To review and process inbound shipping documents and resolve deficiencies and discrepancies found in the documents and in the shipment while ensuring compliance with the manifest requirements of 40 CFR 262 Subpart B, 40 CFR 263 Subpart B and 62-730.160 FAC.

2.0 SCOPE

This procedure applies to the receipt of shipments of hazardous waste at the Perma-Fix of Orlando facility.

3.0 DEFINITIONS

3.1 Hazardous Waste

Waste that meets the criteria in 40 CFR 261 Subpart D for a listed hazardous waste, or has one or more characteristics of hazardous waste as determined in 40 CFR 261 Subpart C.

3.2 Waste Profile

A document that describes the physical and chemical characteristics of a Hazardous Waste that is intended for delivery to the Perma-Fix of Orlando facility. It also contains the EPA waste codes and the DOT shipping description of the waste, and may include Material Safety Data Sheets (MSDS), analytical reports and other information necessary in fully characterizing the waste.

3.3 Waste Analysis Plan

Section II.A.5/6 of the Perma-Fix of Orlando Permit Renewal Application (See reference 4.5). The plan requires Generator characterization of a Hazardous Waste prior to approval for shipment to the facility.

3.4 Hazardous Waste Manifest

EPA Form 8700-22, "Uniform Hazardous Waste Manifest", the documents required by 40 CFR 262.20(a)(1) and defined in the appendix to 40 CFR 262. It may also include Form 8700-22A, a continuation sheet. The Hazardous Waste Manifest is the shipping paper that accompanies each shipment of Hazardous Waste.

3.5 Generator

The person or business entity responsible for generation of a Hazardous Waste.

3.6 **Transporter**

The person or business entity responsible for transportation of a Hazardous Waste.

3.7 **Designated Facility / Alternate Facility**

A facility permitted to accept shipments of hazardous waste from a Generator or another facility, typically a treatment, storage and disposal facility (TSDF). The Generator designates a primary facility for receipt of the Hazardous Waste (Designated Facility) and a back-up facility (Alternate Facility) in case the waste cannot be delivered to the intended destination.

3.8 **Manifest Discrepancies**

Significant differences between the Hazardous Waste received at a Designated Facility and the waste described on the Hazardous Waste Manifest. These differences are defined in 40 CFR 264.72(b) as:

- Discrepancies in type of waste, as determined by inspection or analysis;
- Discrepancies in quantity of waste, either by a 10% discrepancy in weight for bulk shipments, or piece count in containerized shipments;

Waste not permitted for acceptance at the Designated Facility is also considered to be a Manifest Discrepancy requiring return of the Hazardous Waste to the Generator or rejection of the shipment to the Alternate Facility.

3.9 **Check-in Sheet**

Document used to record information gathered during inspections of Hazardous Waste shipments in accordance with the procedure and the Perma-Fix of Orlando Permit Renewal Application (See reference 4.5 Exhibit II.A.7.4). The sheet is generated by the waste tracking system and includes information from the Waste Profile. A sample document is included in Attachment 7.1.

4.0 REFERENCES

4.1 40 CFR 262 Subpart B – The Manifest

4.1.1 Appendix to Part 262 – Uniform Hazardous Waste Manifest and Instructions (EPA Froms 8700-22 and 8700-22A and Their Instructions)

4.2 40 CFR 263 Subpart B – Compliance with the Manifest System and Recordkeeping

4.3 40 CFR 264 Subpart E – Manifest System, Recordkeeping and Reporting

4.4 62-730.160, FAC, Standards Applicable to Generators of Hazardous Waste

4.5 Hazardous Waste Treatment and Storage Facility Permit Renewal Application dated August 14, 2008, revised September 9, 2008.

5.0 RESPONSIBILITIES

5.1 Facility Manager

Responsible for overall safety and compliance of Perma-Fix of Orlando operations. The Facility Manager also performs the responsibilities of the Environmental Health & Safety Manager as needed.

5.2 Environmental Health & Safety Manager (EH&S Manager)

Responsible for:

- Review of Hazardous Waste Manifests for accuracy;
- Review of inspection results for incoming shipments;
- Notification to the Generator for discrepancies in incoming shipments;
- Resolving discrepancies with the Generator in accordance with regulations and the time limits established by regulation.

5.3 Facility Operator

Responsible for:

- Inspecting incoming shipments;
- Ensuring that incoming Hazardous Waste containers are labeled appropriately;
- Verifying incoming waste description with the Waste Profile;
- Verifying type and quantity of Hazardous Waste with the manifest description;
- Ensuring that shipment waste codes and DOT description match the Waste Profile;
- Reporting any discrepancies to the Facility Manager and the Environmental Health & Safety Manager.

5.4 Generator

Responsible for:

- Characterizing the Hazardous Waste it generates;
- Completing the Waste Profile Record appropriately;
- Completing the Hazardous Waste Manifest;
- Packaging the Hazardous Waste according to DOT standards;
- Resolving discrepancies with the facility.

6.0 PROCEDURE

6.1 **Waste Profile**

6.1.1 A Generator completes the Waste Profile for a Hazardous Waste stream intended for storage at Perma-Fix of Orlando in accordance with the requirements of the Waste Analysis Plan.

6.1.2 Based on the information provided on the Waste Profile, Perma-Fix issues an approval letter to the Generator listing approved EPA waste codes and the DOT shipping description along with an approval code.

6.1.3 The Generator prepares the Hazardous Waste for shipment in accordance with the instructions for preparing the Hazardous Waste Manifest.

6.2 **Shipment Inspection and Manifest Verification**

6.2.1 The Facility Operator shall inspect an incoming shipment of Hazardous Waste for the following items:

6.2.1.1 The Hazardous Waste label is present, correct and legible;

6.2.1.2 The container type and count matches the Hazardous Waste Manifest;

6.2.1.3 The description on the container of Hazardous Waste matches the Waste Profile;

6.2.1.4 The EPA waste codes and DOT shipping description on the Hazardous Waste containers match the Waste Profile description.

6.2.2 The Facility Operator shall record the results of the inspection on the container Check-in Sheet. Any discrepancies are noted on the sheet and in block 18 of the Hazardous Waste Manifest.

6.2.3 The Facility Operator shall correct any incomplete or inadequate markings on the Hazardous Waste container label to ensure it corresponds to the information in the Waste Profile Record. Inconsistent markings suggesting that the waste does not match the profile shall be recorded on the Check-in Sheet.

6.2.4 The Facility Operator shall immediately notify the Facility Manager and EH&S Manager of any shipment discrepancies that may require implementation of the facility contingency plan or otherwise endanger heath, safety and the environment.

6.2.5 The Facility Operator shall forward the manifest and Check-in Sheet to the Facility Manager and EH&S Manager for further review.

6.3 **Manifest Review and Discrepancy Resolution**

6.3.1 The Facility Manager shall review the Hazardous Waste Manifest in accordance with the manifest instructions in the Appendix to 40 CFR 262 (see reference 4.1.1).

6.3.1.1 The Facility Manager shall ensure that Generator, Transporter and Designated Facility information is correct.

6.3.1.2 The Facility Manager shall complete the Designated Facility information on the manifest, sign and remit a copy to the Generator.

6.3.1.3 The Facility Manager shall retain the manifest in the facility operating record in accordance with 40 CFR 264.71(a)(2)(v).

6.3.2 The EH&S Manager shall review the manifest and Check-in Sheet, and ensure that the manifest information is correct, including the Generator's EPA identification number.

6.3.2.1 The EH&S Manager shall notify the Generator of any discrepancies related to the shipment and the Hazardous Waste Manifest using the Manifest Discrepancy Notification Form (Attachment 7.2).

6.3.2.2 The EH&S Manager shall investigate inconsistent or conflicting marking or labeling that is reported on the Check-in Sheet.

6.3.3 The EH&S Manager shall resolve any discrepancies with the Generator within 15 days of discovery.

6.3.3.1 The Generator shall provide information as requested by the EH&S Manager.

6.3.3.2 The Generator shall forward additional or revised documents as requested by the EH&S Manager.

6.3.3.3 The Generator shall amend the Waste Profile as deemed necessary by the EH&S Manager.

6.3.4 If the Generator is unable to resolve the discrepancy with the facility, the Facility Manager shall arrange for the rejection of the shipment and return the Hazardous Waste to the Generator.

6.4 **Unauthorized Waste Shipments**

6.4.1 Hazardous Waste sent to the facility without approval or an accompanying Hazardous Waste Manifest shall not be accepted.

6.4.1.1 The Facility Operator shall label such waste as "Rejected Waste".

6.4.1.2 The Facility Manager shall record information for the waste on the Rejected Waste Log (Attachment 7.3).

6.4.1.3 The Facility Manager shall ship the rejected waste offsite within ten days of receipt.

6.4.1.4 The Generator may elect to complete a Waste Profile and obtain approval within the ten-day timeframe. In this event, the waste shall be evaluated handled as described in items 6.1 through 6.3 above.

6.4.1.5 In the case of a missing Hazardous Waste Manifest for a shipment that was approved for acceptance at the facility, the Generator shall provide a complete and accurate manifest within ten days.

6.4.1.6 During the ten days, the Facility Manager shall manage and track the Hazardous Waste in accordance with the provisions for a transfer facility.

6.4.2 If the Generator is unable to resolve the issue of a missing Hazardous Waste Manifest in accordance with the provisions of 6.4.1 above, the EH&S Manager shall report the issue as unmanifested waste on EPA Form 8700-138 "Unmanifested Waste Report." The report shall include the following:

6.4.2.1 Name, address and EPD identification number of the facility;

6.4.2.2 Date the waste was received at the facility;

6.4.2.3 Name, address and EPD identification number of the Generator and Transporter;

6.4.2.4 Description and quantity of each unmanifested waste;

6.4.2.5 Facility from which unmanifested waste was received;

6.4.2.6 The method of treatment, storage and disposal for each unmanifested waste;

6.4.2.7 Certification of the Facility Manager;

6.4.2.8 Brief description of why the waste was not manifested (if known).

7.0 ATTACHMENTS

7.1 Sample Check-in Sheet

7.2 Manifest Discrepancy Notification Form

7.3 Rejected Waste Log

Perma-Fix of Orlando Container Check-In Sheet

Document Number: DO08688 Transporter: PERMA-FIX OF ORLANDO, INC Received Date: 1/14/2003
Manifest No: 20709 Line: 1 A Load
Manifest Line: 1
State Manifest#
Sales Order: PRCESQG11200

Generator:	HOME DEPOT #6408	Bill To Customer:	HOME DEPOT C/O 3-E COMPANY (SE)
Address 1:	State hwy 52 and SR 842	Address 1:	1950 Aston Lane
Address 2:		Address 2:	
City:	SAN JUAN	City:	CARLSBAD
State:	PR	State:	CA
Zip:		Zip:	92009
Phone:		Phone:	
Process Code:	P12	Checked In By:	
Profile No:	HOMF8046	Check In Date:	
Waste Name:	PAINT/PAINT - RELATED MATERIALS		

Product Code: FS-LIQ-02

Composition:
ABSORBENTS, PAPER, PLASTIC, WEEDS, METAL, ETC 0 - 25 %
ACETONE .1 - 2 %
BENZENE .001 - 1 %
PAINT, STAIN, ADHESIVES,PRIMER ROOF COATING 60 - 100 %
SOLVENTS, PAINT THINNER, MINERAL SPIRITS, ETC 0 - 40 %
TOLUENE 1 - 4 %

PPE:

	Profile Waste Description	Manifested Waste Description
Proper Shipping Name:	Waste Flammable liquids, n.o.s. (Petroleum Distillates, Toluene)	Waste Flammable liquids, n.o.s. (Petroleum Distillates, Toluene), 3, UN1993, PGII
Technical:		(TOLUENE)
EPA Waste Codes:	D001, D018, D035, U002, U159, VARY	D001

Document/Item	Size	Type	Solids	Liquids	pH	Spg	Weight	Comments
DO08688 - 1	55	DF						

Attachment 7.1 Sample Check-in Sheet

Load/Manifest Discrepancy Notification

Customer Name:____ PFO Document/Tracking # ____
Load No: ____ Receipt Date: ____ Manifest No:____

Pg/Line	Discrepancy	Resolution	Accept
			☐
			☐
			☐
			☐
			☐
			☐
			☐
			☐
			☐
			☐
			☐
			☐
			☐
			☐
			☐

Customer Acknowledgement Date

Thank you for your business. Please call your Customer Service Representative with any questions.

		Wednesday, January 29, 2003
Perma-Fix Representative	Title	Date

Phone: 407-859-4441 Fax: 407-855-2812

This document is being sent as notification of a Manifest/Profile Discrepancy for materials that are being delivered/received at Perma-Fix of Orlando, Inc. PFO MUST receive acknowledgement of receipt of this document and authorization by signature (or other means) to remedy above discrepancy within 24 hours or this material is subject to rejection or additional charges.

DO NOT DUPLICATE

Attachment 7.2 Manifest Discrepancy Notification Form

REJECTED WASTE LOG

GENERATOR EPA #	MANIFEST NUMBER	APPROVAL NUMBER	DATE RECEIVED	REASON	# DRUMS	SOLUTION	APPROVAL OR EXIT DATE	NOTES

DO NOT DUPLICATE

Attachment 7.3 Rejected Waste Log

Updated Facility Contingency Plan

1000 Rocket Boulevard Orlando, FL 32824

Contingency Plan for Solid and Hazardous Waste Operations

Perma-Fix of Orlando Facility
10100 Rocket Blvd
Orlando, FL 32824

Update Prepared by

Kurt Fogleman
Environmental Health and Safety Manager
Perma-Fix Southeast Region
1940 NW 67th Place
Gainesville, FL 32653
(352) 395-1356

TABLE OF CONTENTS FOR CONTINGENCY PLAN PERMIT APPLICATION SECTION NO. II.A.4.b

TABLE OF CONTENTS
FOR
CONTINGENCY PLAN
PERMIT APPLICATION SECTION NO. II.A.4.b
(continued)

TABLES

EXHIBITS

CONTINGENCY PLAN

1.0 INTRODUCTION

This document is prepared for Perma-Fix of Orlando, Inc. (PFO) to comply with state regulations for facilities seeking a permit to manage hazardous wastes. The regulations require such facilities to insert into the permit application a copy of the contingency plan to be reviewed by the Florida Department of Environmental Protection (DEP) and approved with the issuance of the corresponding permit. Once the permit is issued, the permitted facility is required to provide a copy of the contingency plan to emergency response organizations likely to respond to incidents at the facility. This document is designed to provide helpful information about installations and potential hazards to emergency personnel responding to incidents at the facility, as well as to instruct facility personnel on what steps to take in case of emergency incidents.

This document contains plans and procedures established at PFO to minimize hazards to human health, property, and the environment in case of spills, fires, explosions, or other incidents that may release hazardous waste from storage and treatment units at the facility.

Plans and procedures in this document include information on emergency service organizations, assessment of potential dangers, decision criteria and implementation methods for the contingency plan, emergency procedures, an evacuation plan, and a list and location of emergency equipment. This document also contains the names of persons responsible for coordinating emergency activities and the names of local government, regulatory agencies, institutions, and contractors that will provide support, mitigation, and relief in case of emergencies. A copy of the contingency plan will be maintained at the facility and will be provided to local emergency service organizations.

2.0 GENERAL INFORMATION

This contingency plan and emergency procedures are prepared for PFO with a mailing and site address at 10100 Rocket Boulevard, Orlando, Florida 32824. The facility telephone number is (407) 859-4441. The facility site is located in the southwest part of Orlando in the Regency Industrial Park, located approximately 3.5 miles west of the Orlando International Airport and about 1.5 miles to the southeast from the intersection of State Road 528 (Bee-Line Expressway) and the Florida Turnpike. The PFO site may be accessed from north and south Orange Blossom Trail (OBT) through Taft-Vineland Road and the Central Florida Parkway, respectively, and through Taft-Vineland Road from Orange Avenue. The closest road intersection on Rocket Boulevard from the facility is General Drive, which is located half a block away to the west. The facility site, roads, and intersections mentioned above are shown in a map included in Figure II A 6 .

The facility stores hazardous and non-hazardous in containers. Hazardous wastes received at PFO are generated by manufacturing and service industries. The hazardous wastes are transported to the facility in DOT-approved containers. The wastes received at PFO are consolidated in larger containers or shipped out in the same container in which they were received by the facility.

3.0 EMERGENCY SERVICE ORGANIZATIONS

Table II.A.4.b.-1 lists the service type, name of the service organization, and telephone number for each organization that has been identified as a potential emergency service organization. This list will be posted near telephones located in areas from which emergency calls are most likely to be made to provide callers with the information necessary to summon help in case of an incident.

The type of organizations that are most needed in case of an emergency are: Emergency Response (Hazardous Materials) Team, Fire Department, Hospital, and Sheriff's Department. Figure II A 7 shows the locations of the organizations mentioned in the previous sentence that are closest to the PFO site. These organizations will be provided with a copy of the contingency plan upon its approval by the Florida DEP. These organizations will also be notified every time there is a change in –

1. emergency coordinators.
2. waste type or location of waste types that pose an additional or different safety concern to the ones described in this plan.
3. structures, equipment, or operations that affect the way this plan is to be implemented.
4. structures, equipment, or operations that alter the level of hazard at the facility
5. emergency procedures contained in this plan that may affect the level of service to be rendered by these organizations.

This document will be amended to reflect any of the changes described above, and a copy of the amended document will be provided to those organizations. This plan will also be amended when changes are necessary to improve response to emergencies.

Emergency organizations are expected to provide the following support during emergencies:

Hazardous Materials Emergency Response Team

The HAZMAT team will help mitigate hazards posed by hazardous materials that are out of control and help retrieve injured personnel from hazardous environments. The unit that renders this type of service is based at Station #50, which is located near the intersection of Interstate 4 (I-4) and U.S. Highway 441 (OBT) about 7 miles north of the site at 1415 West 29 Street, Orlando (about 12 minutes from the facility). This unit is known as Squad 1. This organization will be provided with a copy of this contingency plan.

Fire Department

The Orange County Fire Department will respond to fires and other emergency incidents providing fire protection and rescue services. The department operates units located in several stations near the PFO site. These stations and their response capability are listed below.

Station #73: This unit is located in the town of Taft less than 2 miles northeast from the site at the intersection of Orange Avenue (State Road 527) and 1st Street, at 811 E. 1st Street, Orlando.

The response time for this unit is about 4 minutes. This unit will be the first responder in the event of a fire.

Station #53: This unit is located just east of OBT about 2 miles northeast from the site, at 1270 La Quinta Drive, Orlando. The response time is approximately 6 minutes. The unit can provide medical support.

Station #51: This unit is located just west of OBT about 4.5 miles north from the site, at 1700 W. Oakridge, Orlando. The unit's response time is approximately 10 minutes. The unit can provide a ladder truck in case of a fire.

A copy of the contingency plan for the Orange County Fire Department will be provided to the Deputy Chief, Operations at the Orange County Fire Rescue Division, 6590 Amory Court, Winter Park, Florida 32792 upon approval of the plan by the Florida DEP.

Hospital

Orlando Regional Healthcare (ORH) is capable of providing almost all emergency medical services that may be needed by injured personnel. ORH offers minor trauma services at the Dr. P. Phillips Hospital located just west of I-4 and about 6 miles east of the site, at 9400 S. Turkey Lake Road, Orlando. The time of travel is about 10 minutes from the facility. ORH offers major trauma services at the Orlando Regional Medical Center (ORMC) located about 8 miles north of the site at 1414 Kuhl Avenue, Orlando, Florida 32806. The time of travel to this unit is about 14 minutes from the facility. A copy of the contingency plan will be mailed to the ORMC upon approval of this plan by the Florida DEP.

Sheriff's Department

The Orange County Sheriffs Office is available to direct traffic, handle crowds, and provide security during emergency situations. The Sheriff will be provided a copy of this document at the Orange County Sheriff Office, 2500 W. Colonial Drive, Orlando, Florida 32802, upon its approval by the Florida DEP.

Copies of the contingency plan, in accordance with statements shown above, will be provided to the emergency service organizations within 30 days after the permit is renewed. Certified return receipt slips providing proof of mail and delivery of the documents will be kept with pertinent records at the facility.

Incidents of large magnitude may require the use of heavy equipment for containment, removal, and transportation of contaminated materials. In the event that the heavy equipment is not available, PFO will seek the help of outside emergency response contractors to assist the facility during special emergency circumstances.

4.0 EMERGENCY COORDINATORS

In case of emergency, the following people would be in charge of emergency coordination and remedial action:

NAME	HOME ADDRESS	PHONE
Cory Howard (Primary)	424 Manhattan Dr. Orlando, FL 32839	Cell: (407) 963-2697
John MacDonald	760 Oak Lane Orange City, FL 32763	Cell: (407) 697-3232
Rob Boal	581 Tyler Ave Deltona, Fl 32725	Cell: (407) 690-8656

If an emergency situation develops at the facility, the discoverer should contact an emergency coordinator listed above. Cory Howard, the primary emergency coordinator, should be contacted first. If he is not available, Mr. MacDonald should be called.

The primary emergency coordinator and his alternate have the authority to commit all resources of the company in the event of an emergency.

5.0 AREAS AND MATERIAL PRESENTING POTENTIAL HAZARDS

The facility has certain areas that present a potential hazard because of the materials that are stored or processed at those locations. The degree of hazard present in these areas is based on the material types, the quantities managed, and the level of handling such materials. These areas are the Container Storage Unit and the two Consolidation Areas. Figure I B 1 contains a layout of the PFO facility showing the areas listed above. The portion of the facility that includes the areas mentioned above is considered the "active portion of the facility". This section of the plan describes each area in detail, the operations conducted in each area, the materials handled, and where each type of material is stored or processed.

5.1 Container Storage Unit

This area receives hazardous and non-hazardous waste in drums that are stored on pallets. The pallets are, at the most, double-stacked, with each pallet holding up to four –55-gallon drums. The pallets are placed in rows, as depicted in Figure I D 1. Every storage cell is identified with a sign showing the hazard class(es) of compatible wastes stored in the cell. The compatibility of different wastes within a cell is determined by a compatibility system established by the Department of Transportation (DOT).

The reason for using the DOT compatibility system is to prevent two incompatible materials from coming in contact with each other and generating a reaction, which could result in fire, explosion, or generation of toxic gases. EPA hazardous waste codes are assigned based on the hazardous characteristics exhibited by the material. These characteristics may be ignitability, corrosivity, reactivity, or toxicity. A DOT hazard class is a number that indicates the category that has been assigned to a material based on the type of hazard it presents. Table II.A.4.b.-2 contains the Segregation Table obtained from DOT. It has been modified to delete hazard classes that PFO is not permitted to manage at the facility (1.1 through 1.6 - explosives, and 7 - radioactives)

The next table, labeled Table II.A.4.b.-3, lists the hazardous wastes stored in the container unit by waste description, EPA hazardous waste code, chemical abstracts service (CAS) registry number, and DOT hazard class. This table is helpful in identifying the waste material because it shows the description and the CAS number, which can be used to find information about the material in chemical dictionaries, Material Safety Data Sheets (MSDSs), or other chemical information sources. This table identifies unaltered waste materials based on the assigned hazardous waste codes. Waste material properties and characteristics may be changed by the generation process or other conditions. DOT hazard classes shown on containers that are stored in this unit are based on the actual properties and characteristics exhibited by the waste materials in the containers, in accordance with an evaluation of the waste completed before the waste was received by the facility. The containers in this unit are placed in cells with the hazard classes displayed on the container and each cell. The purpose of the segregation system instituted by PFO is to indicate to operators where to place specific waste containers within the unit and to provide emergency responders with an easy and quick way to identify hazards present within the unit.

There is a special cabinet for Division 4.3 Dangerous When Wet (water-reactive) wastes. It will protect up to four 55-gallon drums from water in case the sprinklers inside the container storage unit is activated. It is typically kept in the northeast corner of the container storage area. A ketch of the cabinet is provided as Exhibit II.B.1.-2. The cabinet is equipped with a dry chemical fire suppression system, and will store a maximum of four 55-gallon drums.

Figure I D 1 shows the container storage unit, with locations of each row of pallets. Signs showing the corresponding hazard classes for wastes currently stored in every cell will be posted on cell walls at locations clearly visible for first responders.

5.2 Consolidation Areas [SUSPENDED ACTIVITY]

Please note that the following activities are suspended indefinitely: *[The consolidation operation consists of taking waste material from inbound containers and placing it into another outbound container that holds a similar type of waste material. Waste materials in both containers must be of similar type to meet acceptance criteria of off-site facilities. Consolidation may occur from small containers holding as little as a few ounces to containers as large as a dump trailer. Consolidation operations take place in the north building or in an area west and outside of the north building. In addition, solid materials may be bulked in a roll-off or other bulk container placed just outside the north building. These areas are shown in Figure I D 1.]*

6.0 IMPLEMENTATION OF CONTINGENCY PLAN

The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could potentially threaten human health and safety or the environment. This plan provides specific guidelines for activating the emergency procedures in the contingency plan. Three factors will be evaluated: potential hazards of confined spills, spills affecting incompatible wastes, and uncontrolled spills. If a spill inside a secondary containment poses a threat in the form of fire or explosion or creates a health problem, the contingency plan will be activated.

Emergency procedures in the contingency plan will be implemented when spilled material comes in contact with incompatible wastes and there is a potential of a reaction that may result in fire, an explosion, or generation of poisonous or flammable gases. Uncontrolled spills that have the potential or have resulted in releases to the environment in magnitudes that equal or exceed reportable quantities in the 40 CFR 302.4 will also require the implementation of the contingency plan. Releases are defined in the 40 CFR 302.3. The Florida DEP will be notified of incidents at the facility requiring the implementation of the contingency plan or when the size of the release into the environment equals or exceeds the reportable quantities. Spills will be documented in inspection records. The next sections will provide guidance to the emergency coordinators in making decisions by providing explicit instructions to be carried out in the event of an emergency.

7.0 EMERGENCY PROCEDURES

Upon being notified by facility personnel or government officials of a hazardous waste release that could threaten human health or the environment, as determined by the Emergency Coordinator, he/she will -

1. immediately identify the character, exact source, amount, and real extent of any released materials via observation, review of facility records, or chemical analysis, if necessary.

2. call in any extra personnel needed to complete the initial evaluation of the situation.

3. concurrently assess possible hazards to human health or the environment via the above determinations.

4. notify key support and key management personnel.

5. seek assistance from the Orange County Sheriffs Department, Fire Department and the Florida DEP Central District Hazardous Waste Section, as needed.

6. notify either the government official designated as the on-scene coordinator for that geographical area or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:

    (i) Name and telephone number of reporter
    (ii) Name and address of facility
    (iii) Time and type of incident (e.g., release, fire)
    (iv) Name and quantity of material(s) involved, to the extent known
    (v) The extent of injuries, if any, and
    (vi) The possible hazards to human health, or the environment, outside the facility

7. notify the Florida DEP's 24-hour warning point at 1-800-320-0519 if human health or the environment may be threatened outside the facility. The

determination for the need of notification shall be made with the knowledge of the above assessment of actual conditions.

8. take all reasonable measures necessary during an emergency to ensure that fires, explosions, and releases do not occur, recur, or spread to the other hazardous waste at the facility. All operations shall stop, containers shall be removed and isolated, containment systems shall be inspected, and emergency equipment shall be utilized.

9. provide for treating, storing, or disposing of recovered waste, contaminated soil, or any other material that results from a release, fire, or explosion at the facility.

10. ensure that all emergency equipment is cleaned and fit for its intended use before operations are resumed. Used fire extinguishers shall be replaced, and other equipment shall be inspected as necessary.

11. notify the Secretary of the Florida DEP, and appropriate state and local authorities that the cleanup has been completed; the released material has been treated, stored, or disposed of; and emergency equipment has been cleaned and fit for use before operations are resumed in the facility.

12. submit a written report on the incident to the Secretary of the Florida DEP, within 15 days after the incident and identify such incidents in the facility operating record. The report will include:

    (i) Name, address, and telephone number of the owner or operator
    (ii) Name, address, and telephone number of the facility
    (iii) Date, time, and type of incident (e.g., fire, explosion)
    (iv) Name and quantity of material(s) involved
    (v) The extent of injuries, if any
    (vi) An assessment of actual or potential hazards to human health or the environment, where this is applicable, and
    (vii) Estimated quantity and disposition of recovered material that resulted from the incident

7.1 Responses to Fires, Explosion, and Releases

The previous section was designed to provide general guidance for making decisions and to be used as a check-list during the implementation of the contingency plan. This section deals with the effect that the type and amount of waste materials managed in the operation areas may have on the occurrence and development of emergency incidents at the facility. It also indicates features and equipment found or available in the area that may help mitigate such incidents. The two types of incidents discussed here are only fire and waste material release. Explosions will result either in a fire or a release, which are the incidents addressed in this plan.

7.1.1 Container Storage Unit

This area is considered the area within the active portion of the facility that presents the highest level of potential hazard because of the quantity and types of waste materials that may be present in the area. The largest potential danger in this unit is fire due to the possibility that ignitable material may be stored in it. Containers that arrive at this unit are opened only for sampling, after which they are placed in a storage cell in accordance with the DOT hazard class displayed on the container. As explained in section 5.1 above, the waste materials are segregated into cells having separate secondary containments. Cell segregation and careful management of container placement shall prevent commingling of incompatible wastes. Only small fires will be fought in this area by using any of the 5-pound, 20-pound, or 150-pound fire extinguishers located inside or outside near the entrances to the unit. Personnel will not attempt to extinguish fires where there is a threat that their escape path is threatened. If the fire is not put out within a short time of the fire's initial stage, the fire alarm will be activated as the first step in the implementation of the contingency plan. This storage unit is equipped with an automatic fire sprinkler system that covers the unit's entire area.

Every cell in this unit is provided with secondary containment capable of containing more than 10% of the maximum storage volume permitted for the cell. If the secondary containment capacity of a cell is exceeded, overflow will spill into another cell, from which, when exceeded, overflow will spill into another cell, and so on. The only way a spill may be released outside the unit is if the spill becomes of such magnitude that it exceeds all the internal cells' secondary containment volumes, and the capacity of the berm that surrounds the entire unit. The berms and walls that surround the entire unit are higher than the berms that provide containment for the internal cells. Therefore, a release to areas outside the container storage unit is unlikely.

Spills confined to the cell where the spill occurs should not present a hazard to human health or the environment as long as the spill is cleaned up within a reasonable period of time in accordance with proper safety procedures. Such spills will not activate the implementation of the emergency procedures in this contingency plan.

Spills that exceed the cells' secondary containment volume will not activate the implementation of the contingency plan as long as the spill only affects cells that store compatible waste materials. Spills will be confined to the smallest possible area using sorbent booms and oil dry. Standing liquid pools will be collected with air driven pumps and/or sorbent material. A spill from only one cell that affects another cell, which stores waste that is not compatible with the spilled material, will activate the implementation of the contingency plan, and the spill will be collected immediately with great care. The spilled material will be transferred to containers and identified from information obtained in the waste characterization process. Spills where two or more waste streams become commingled may require testing of the release for characterization depending on whether spilled waste streams were identified and on whether the collected material may be substantially different from the spilled waste streams. Spills that result in releases outside the unit will require full implementation of the contingency plan. Waste spilled outside the unit may be contained by creating earthen berms in the parking lot. If these berms are overrun, the waste will spill into the stormwater pond. Releases into the soil will require removal of contaminated soil and verification of decontamination through sampling and testing

of surrounding soils. All collected wastes from spills will be properly disposed of by permitted methods.

7.1.2 Consolidation Area [SUSPENDED ACTIVITY]

Please note that the following activities are suspended indefinitely: *[Operations conducted in this area involve solids and liquids. Liquids managed in this operation include acids, caustics, labpacks, inorganic contaminants, and small quantities of materials that have hazardous properties, like oxidizers and combustible solids. Materials are tested for compatibility before they are consolidated. Some wastes containing free liquids may be solidified by mixing with absorbents. The consolidation area inside the building is equipped with an automatic fire sprinkler system and there are a number of 5-pound, 20-pound, and 150-pound fire extinguishers either in the area or nearby.]*

8.0 EMERGENCY EQUIPMENT

The facility is equipped with the adequate emergency equipment to respond to several types of emergency incidents. The emergency equipment is placed in strategic locations where it can be reached quickly and safely in the event of an emergency.

All emergency equipment is dedicated to emergency situations and is not used for normal operations. Use of the emergency equipment is not limited to events that require implementation of the Contingency Plan. However, all emergency equipment will be cleaned and fit for use immediately after it has been used and will be placed in the locations indicated in this section of the plan. To control access to the cabinet and assure immediate identification of status, the cabinet will be secured with a seal that is easy to break. Only one person will be designated the keeper and replacer of the seals. Weekly inspections will ensure that the emergency equipment is complete and ready to use.

Alarm switches are located in the administration building. Since the property is small in area and all active areas and units are open to the outside, a spoken call for help can be heard in all the active areas of the facility where operators are working during working hours. An employee working alone will carry a walkie-talkie and/or a cell phone. The small area of the facility makes internal communication devices unnecessary for emergency situations.

A fire hydrant, located near the entrance to the facility, provides water in case of a fire. A fire sprinkler system services the container storage unit and the north building. A cellular phone will be available for the receptionist to use during power outages. Power outages will neither create an incident during normal operation processes nor affect response to emergency situations.

Figure II A 8 shows the location of the emergency equipment. Table II.A.4.b.-4 lists the equipment stored in the cabinet and shown in the figure mentioned above.

9.0 EVACUATION PLAN

All emergencies require prompt and deliberate action. In the event of any major emergency, it will be necessary to follow an established set of procedures. Such established procedures will be

followed as closely as possible; however, in specific emergency situations, the Emergency Coordinator may deviate from the procedures to provide a more effective plan for bringing the situation under control. The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation.

Total plant evacuation is initiated only by the Emergency Coordinator. A fire alarm system is installed with alarm boxes located at critical areas in the facility. The fire alarms can also be used to summon aid in other emergency situations. All employees are familiar with relevant alarm box locations.

In the event plant evacuation is called for by the Emergency Coordinator, the following actions will be taken:

a. The instructions for plant evacuation will be communicated using the internal paging system.

b. No further entry of visitors, contractors, or trucks will be permitted. All vehicle traffic within the plant will cease to allow safe exit of personnel and movement of emergency equipment.

c. ALL personnel, visitors, and contractors will immediately leave through the exit gate to gather at the designated rally point.

d. No persons shall remain or reenter the location, unless specifically authorized by the person or persons calling for the evacuation. In allowing this, the person in charge assumes responsibility for those persons within the perimeter. Those within the fenced area will normally only include fire brigade personnel or emergency teams.

e. ALL persons will be accounted for by their immediate supervisors.

f. The appointed rally point is located at Rocket Boulevard by the east gate. Immediately upon exit, the highest ranking supervisor will compile a list of all personnel at the rally point.

g. Upon completion of the employee list, the supervisor in charge will hand-carry the list to the Emergency Coordinator. All other personnel will remain at the gate area.

h. The names of plant personnel and/or other emergency team members involved in emergency response will be reported, in writing, to the front gate by designated response team personnel.

i. A final tally of personnel will be made by the Emergency Coordinator.

j. An attempt to find persons not accounted for will be made only if it does not involve endangering lives of others by reentry into emergency areas.

k. Reentry in the fenced area will be made only after clearance is given by the Emergency Coordinator. At his or her direction, a signal or other notification will be given for reentry into the plant.

l. In all questions of accountability, immediate supervisors will be held responsible for those persons reporting to them. Visitors will be the responsibility of those employees being visited. Contractors are the responsibility of those persons administering the individual contracts. Truck drivers are the responsibility of the warehouse supervisor or the area supervisor where the truck is loading/unloading.

m. Drills are held to practice all of these procedures and are treated with the same seriousness as an actual emergency.

Figure II A 9 shows routes employees and other persons at the facility at the time of an emergency will take when an evacuation is ordered.

10.0 NATURAL DISASTERS

The most probable natural disasters to affect the facility would be either a tornado or a hurricane. Warnings of approaching tornadoes and tropical storms/hurricanes may be received from the National Weather Service or local media.

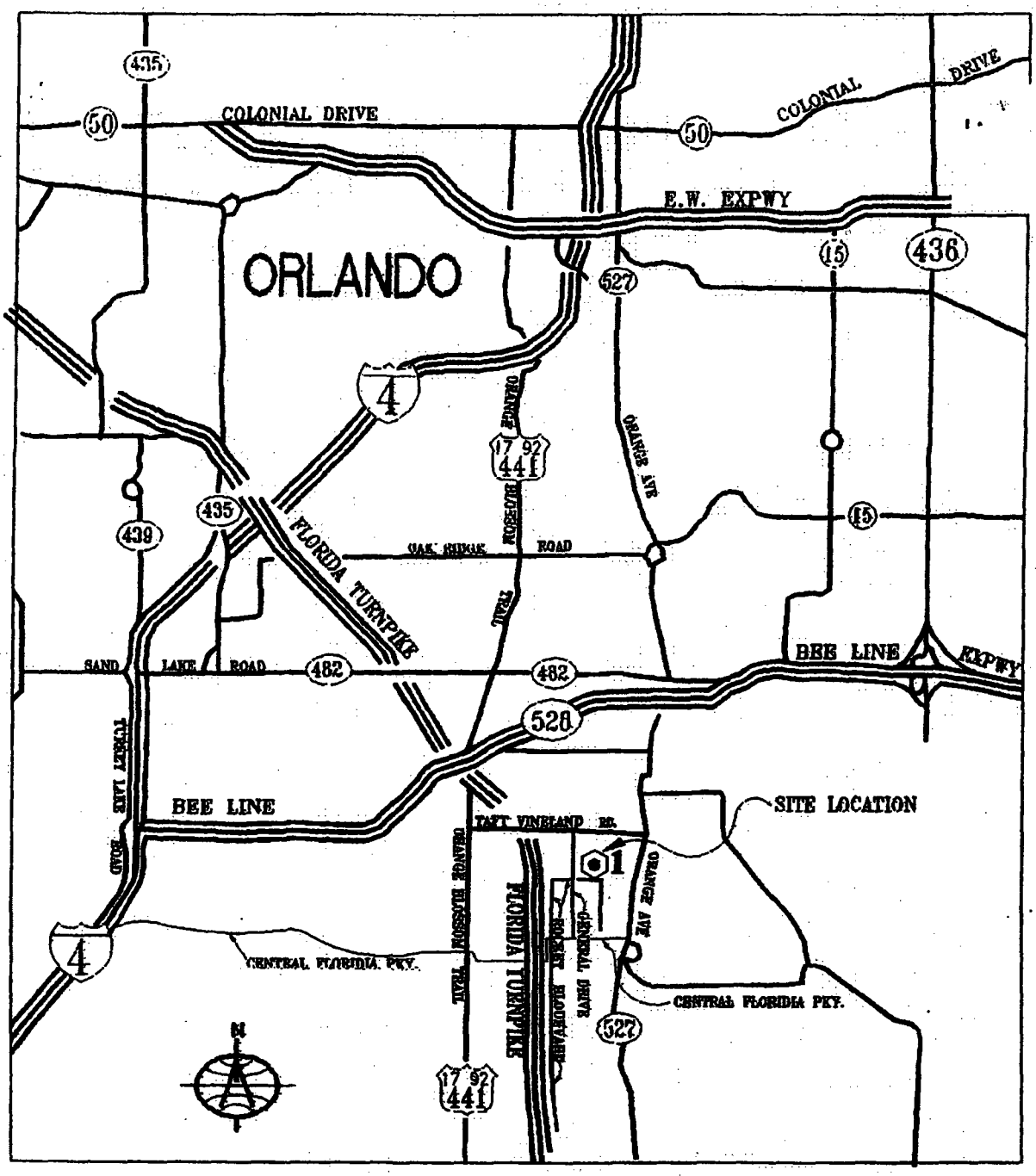
With tornadoes, there is usually little time to make preparations. The only emergency action that can be taken during a tornado warning is to have all employees move to the center of the building they are in. All employees working outside will be notified and required to move inside to a safer location.

Early warning is possible with tropical storms/hurricanes. If it becomes apparent that a tropical storm or hurricane may impact the facility, personnel should attempt to track the path/progress of the storm. If the forecast predicts a tropical storm or hurricane force winds (>39 miles per hour) for the facility, the following steps will be taken:

- All double-stacked pallets of drums in the Container Storage Unit will be placed on the floor if space is available.
- Any empty containers outside will be moved inside to minimize damage caused by flying debris during high winds.
- All outside roll-off containers will be inspected to verify that covering tarps are secure.
- Containers subject to wet weather damage will be covered in plastic or moved inside.
- Any equipment/supplies and other loose objects outside the main buildings will be brought inside, such as empty drums, over-packs, forklifts, spill kits, etc.
- Emergency response equipment (respirators, protective clothing, gloves, etc.) that might be needed to respond to a spill/fire/release will be placed in a location easily accessible to responders.

After the event is over and it is safe to go outside, emergency coordinators will tour the facility to evaluate damage, if any, and implement the Contingency Plan as needed.

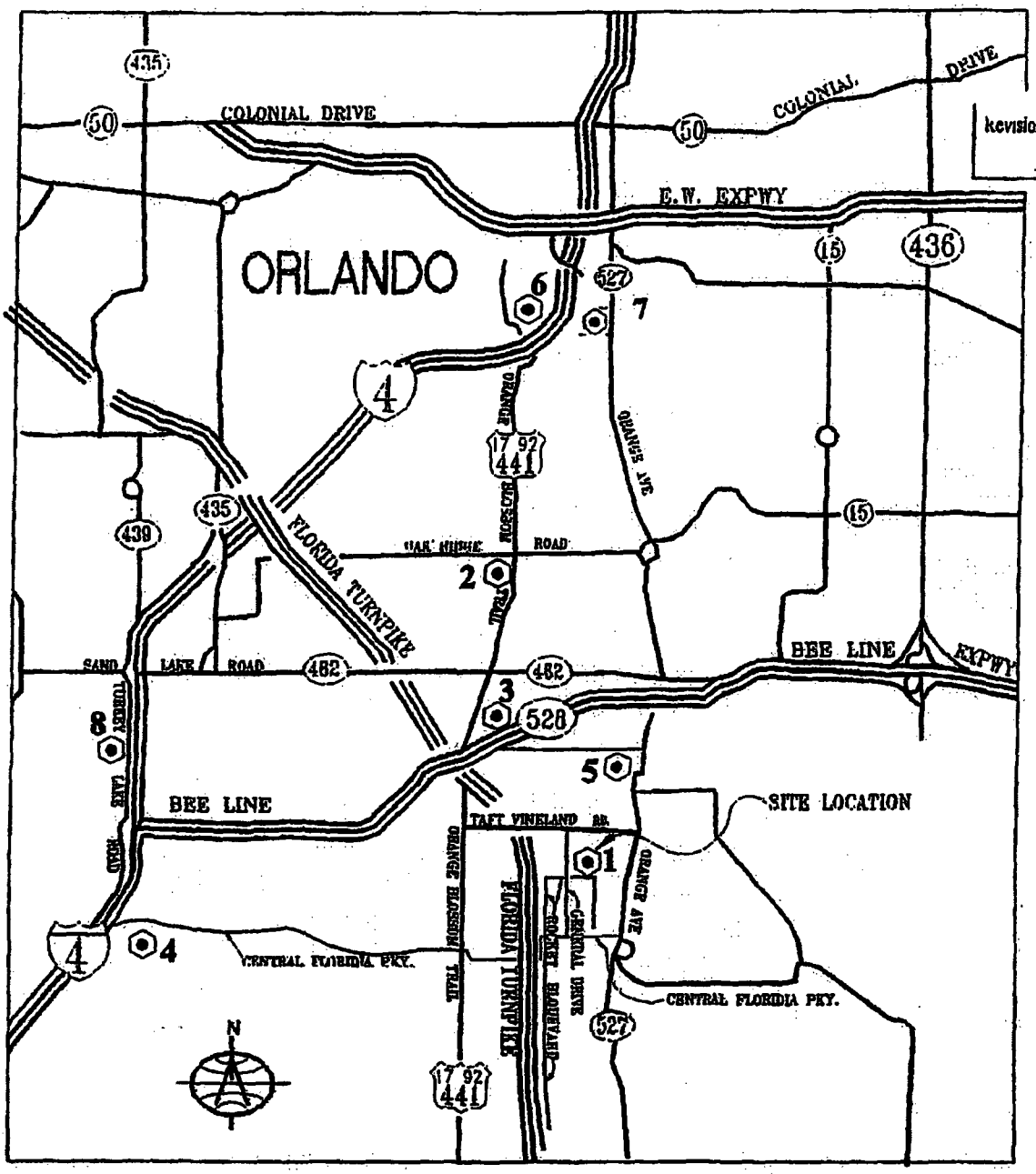
Figure II A 6: FACILITY SITE LOCATION MAP



PERMA-FIX OF ORLANDO

10100 ROCKET BOULEVARD ORLANDO, FLORIDA		
SCALE: N.T.S.	APPROVED BY	DRAWN BY
DATE: 4/20/95		[illegible]
		DRAWING NUMBER
		CCCV1295

Figure II A 7: EMERGENCY SERVICE ORGANIZATIONS MAP



kevision: 0

EMERGENCY SERVICE ORGANIZATIONS

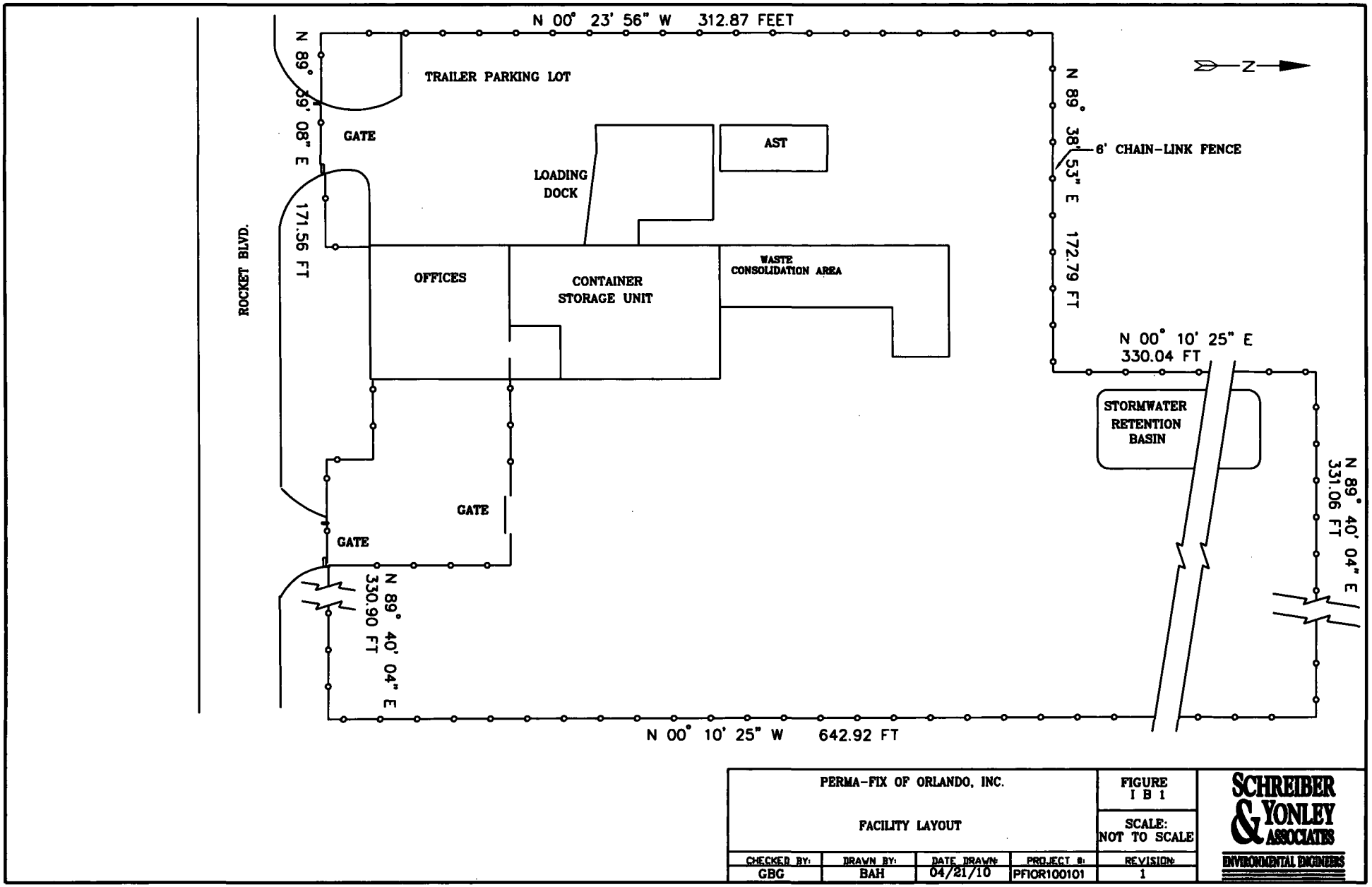
LEGEND:

- 1- PERMA-FIX OF ORLANDO
- 2- FIRE STATION # 51
- 3- FIRE STATION # 53
- 4- FIRE STATION # 54
- 5- FIRE STATION # 73
- 6- HAZARDOUS MATERIAL RESPONDS TEAM #50
- 7- ORLANDO REGIONAL MEDICAL CENTER – KUHL AVE.
- 8- DR. P. PHILLIPS HOSPITAL

PERMA-FIX OF ORLANDO

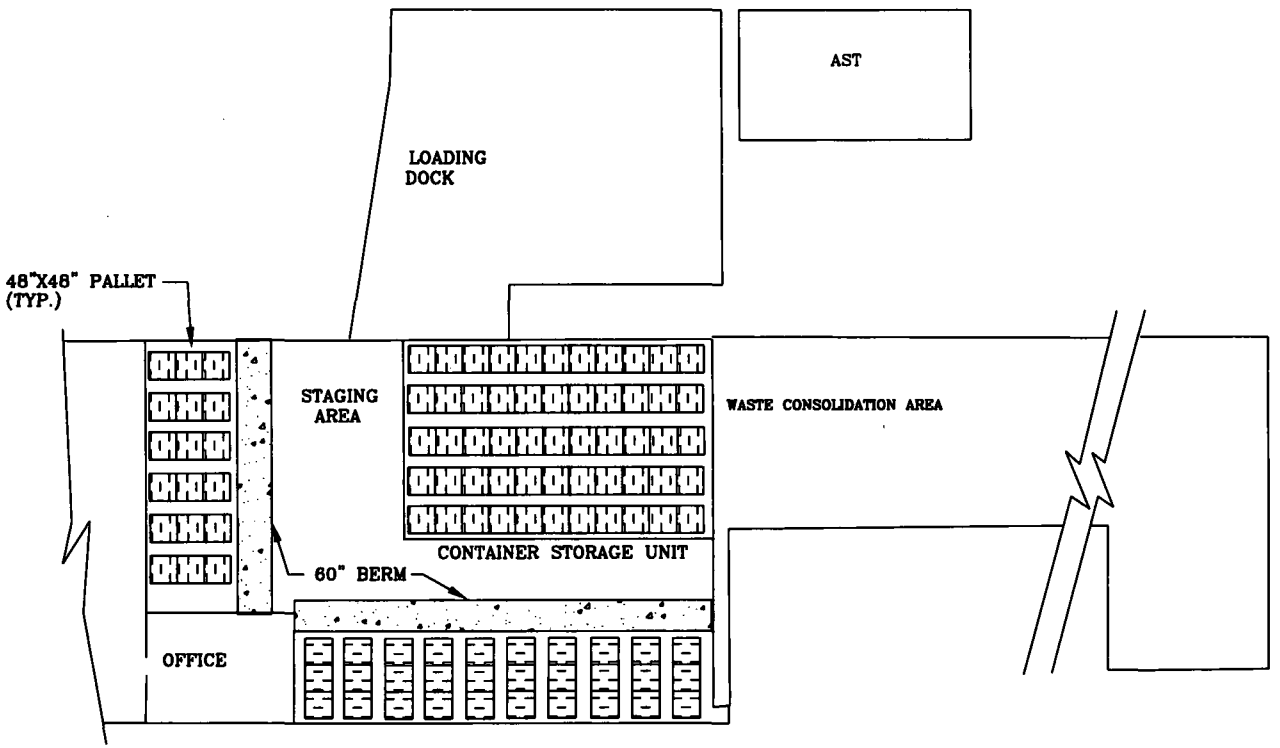
10100 ROCKET BOULEVARD ORLANDO, FLORIDA		
SCALE: N.T.S.	APPROVED BY	DRAWN BY
DATE: 5/9/08		KOH DRAFTING SERVICE
		DRAWING NUMBER CCCVIIIS

Figure I B 1: FACILITY LAYOUT



PERMA-FIX OF ORLANDO, INC.				FIGURE 1 B 1	SCHREIBER & YONLEY ASSOCIATES ENVIRONMENTAL ENGINEERS
FACILITY LAYOUT				SCALE: NOT TO SCALE	
CHECKED BY: GBG	DRAWN BY: BAH	DATE DRAWN: 04/21/10	PROJECT #: PFIOR100101	REVISION: 1	

Figure I D 1: FACILITY STORAGE LAYOUT



PERMA-FIX OF ORLANDO, INC.

FACILITY STORAGE LAYOUT

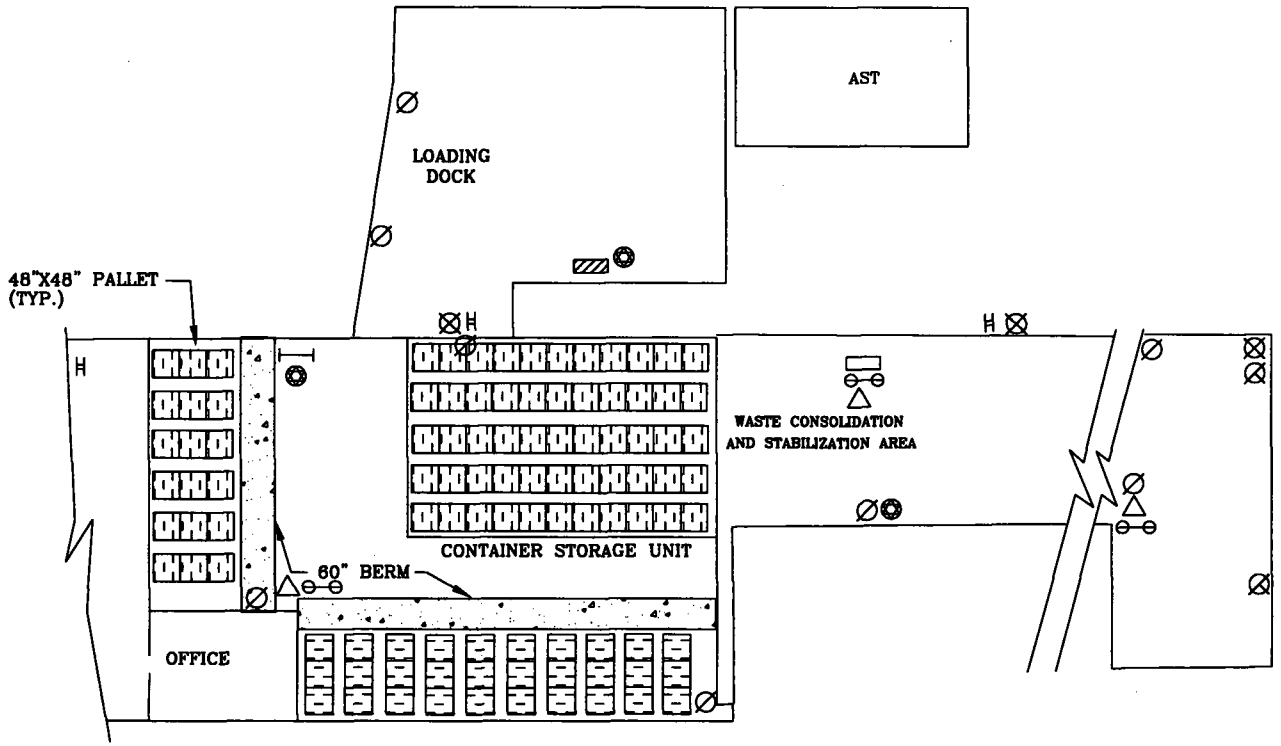
FIGURE I D 1

SCALE: NOT TO SCALE

CHECKED BY:	DRAWN BY:	DATE DRAWN:	PROJECT #:	REVISION:
GBG	BAH	04/21/10	PFIOR100101	1

SCHREIBER & YONLEY ASSOCIATES
ENVIRONMENTAL ENGINEERS

Figure II A 8: EMERGENCY EQUIPMENT LOCATION MAP



LEGEND

- FIRE EXTINGUISHER 5 LBS.
- FIRE EXTINGUISHER 20 LBS.
- FIRE EXTINGUISHER 160 LBS.
- SAFETY SHOWER
- EYE WASHER
- SPILL CONTROL STATION
- STRETCHER
- EMERGENCY AND PERSONNEL SAFETY EQUIP. CABINET
- FIRE ALARM OPERATOR
- FIRE HYDRANT

PERMA-FIX OF ORLANDO, INC.

EMERGENCY EQUIPMENT LOCATION

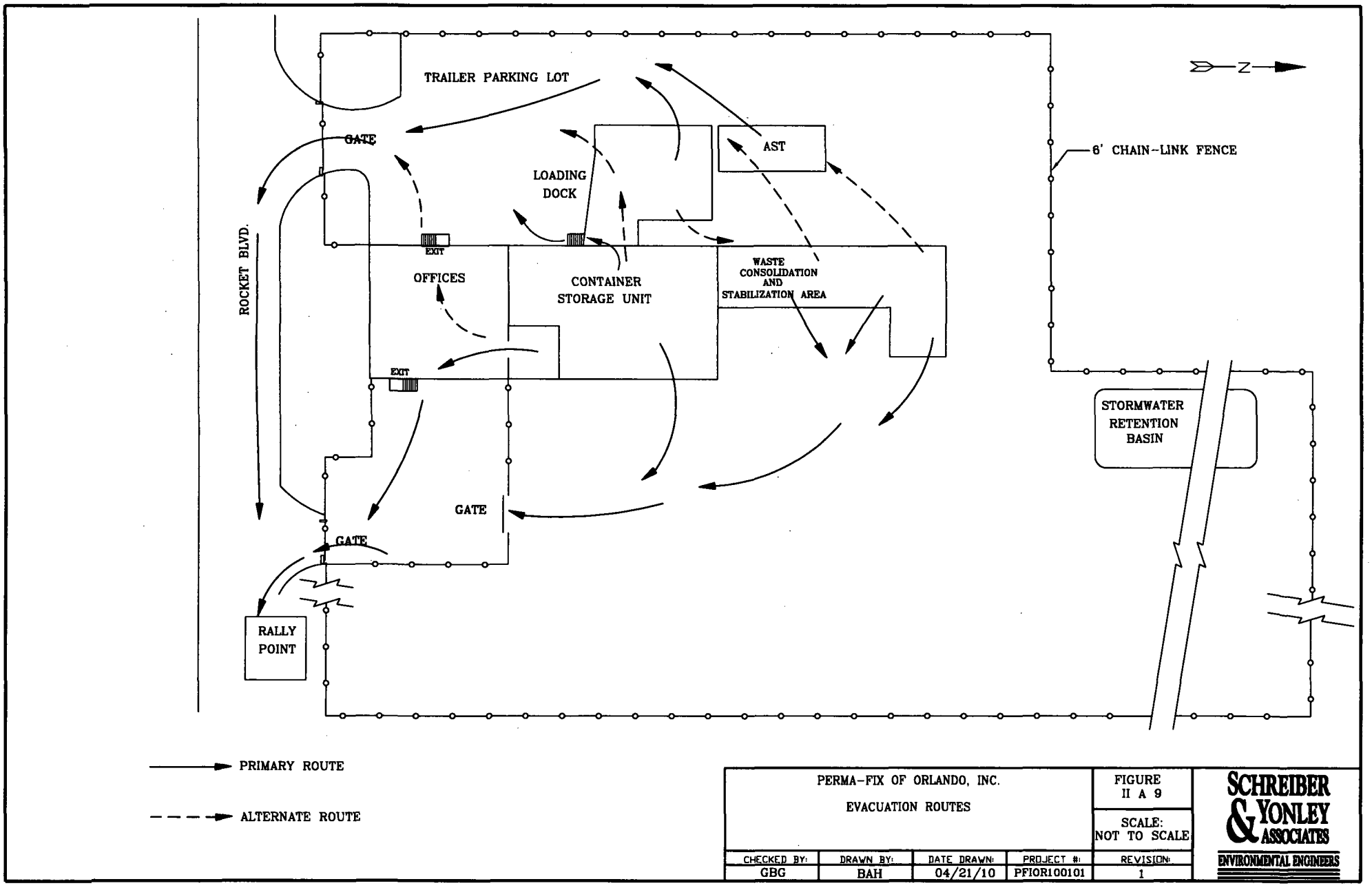
FIGURE II A 8

SCALE: NOT TO SCALE

CHECKED BY:	DRAWN BY:	DATE DRAWN:	PROJECT #:	REVISION:
GBG	BAH	04/21/10	PFIOR100101	1

SCHREIBER & YONLEY ASSOCIATES
ENVIRONMENTAL ENGINEERS

Figure II A 9: EVACUATION ROUTES



PERMA-FIX OF ORLANDO, INC. EVACUATION ROUTES				FIGURE II A 9
				SCALE: NOT TO SCALE
CHECKED BY:	DRAWN BY:	DATE DRAWN:	PROJECT #:	REVISION:
GBG	BAH	04/21/10	PFIOR100101	1

SCHREIBER & YONLEY ASSOCIATES
ENVIRONMENTAL ENGINEERS

Table II.A.4.b.-1
EMERGENCY SERVICE ORGANIZATIONS PHONE NUMBERS

Emergency/Organization	Emergency No.
INJURY	
AMBULANCE	911
ORLANDO REGIONAL MED CENTER	(407) 841-5111
POISON CONTROL CENTER	407-841-5222
	(800) 222-1222
FIRE	
ORANGE COUNTY FIRE DEPT.	911
EXPLOSION	
ORANGE COUNTY SHERIFF DEPT.	911
HAZARDOUS MATERIALS SPILL OR RELEASE	
ORANGE COUNTY FIRE DEPT.	911
ORANGE COUNTY EMERGENCY MANAGEMENT	(407) 836-9104
ORANGE COUNTY ENVIRONMENTAL PROTECTION	(407) 836-1400
FLA. DEPT. OF ENVIRONMENTAL PROTECTION'S	
24-HR STATE WARNING POINT	(850) 413-9911 OR
	(800) 320-0519
ORLANDO EMERGENCY RESPONSE SECTION	(407) 894-7555
NATURAL DISASTER	
ORANGE COUNTY EMERGENCY MANAGEMENT	(407) 836-9140
POTENTIAL FLOOD	
ORANGE COUNTY STORMWATER MANAGEMENT	(407) 836-7946
ALL OF THE ABOVE	
ORANGE COUNTY EMERGENCY MANAGEMENT	(407) 836-9140

Table II.A.4.b.-2

Segregation Table for Hazardous Materials

Class or Division	2.1	2.2	2.3 gas Zone A	2.3 gas Zone B	3	4.1	4.2	4.3	5.1	5.2	6.1 liquids PG I Zone A	8 liquids only	9 H.S.
Flammable gases 2.1			X	O							O	O	
Non-toxic, non-flammable gases 2.2													
Poisonous gas Zone A....2.3	X				X	X	X	X	X	X		X	
Poisonous gas Zone B....2.3	O				O	O	O	O	O	O		O	
Flammable liquids....3.			X	O					O		X		
Flammable solids....4.1			X	O							X	O	
Spontaneously combustible materials....4.2			X	O							X	X	
Dangerous when wet materials....4.3			X	O							X	O	
Oxidizers....5.1			X	O	O						X	O	
Organic peroxides....5.2			X	O							X	O	
Poisonous liquids PG I Zone A....6.1	O				X	X	X	X	X	X		X	
Corrosive liquids....8			X	O		O	X	O	O	O	X		
Hazardous substances....9													

Note: Codes X and O indicate prohibitions and restrictions as noted below.

- An "X" in the table indicates that these materials may not be loaded, transported, or stored together.

- An "O" indicates that these materials may not be transported or stored together unless separated in such a way that, in the event or leakage from packages under normal transportation conditions, the hazardous materials could not commingle. Regardless of the methods of separation employed, Class 8 (corrosive) liquid materials may not be loaded above Class 4 (flammable solid) materials or Class 5 (oxidizing) materials.

- Cyanides or cyanide mixtures must not be loaded or stored with acids or acidic materials. The reaction of cyanides with acids releases deadly hydrogen cyanide gas.

- When the 172.101 Table or 49 CFR 172.402 requires a package to bear a subsidiary hazard label, segregation appropriate to the subsidiary hazard must be applied when that segregation is more restrictive than that required by the primary hazard. However, hazardous materials of the same class may be stored together without regard to segregation required for any secondary hazard if the materials are not capable of reacting dangerously with each other and causing combustion or dangerous evolution of heat; evolution of flammable, poisonous, or asphyxiant gases; or formation of corrosive or unstable materials.

Table II.A.4.b.-3

Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Ignitable Liquid	D001	N/A	3
Corrosive (Acid, Caustic)	D002	N/A	8
Reactive Liquids & Solids	D003	N/A	N/A
Arsenic	D004	7440-38-2	6.1
Barium	D005	7440-39-3	4.3
Cadmium	D006	7440-43-9	6.1
Chromium (Haz. Substance)	D007	7440-47-3	9
Lead	D008	7439-92-1	6.1
Mercury	D009	7439-97-6	8
Selenium (Powder)	D010	7782-49-2	6.1
Silver (Haz. Substance)	D011	7440-22-4	9
Endrin (Haz. Substance)	D012	72-20-8	9
Lindane (Haz. Substance)	D013	58-89-9	9
Methoxychlor (Haz. Substance)	D014	72-43-5	9
Toxaphene (Haz. Substance)	D015	8001-35-2	9
2,4-D (Acid – Haz. Substance)	D016	94-75-7	9
2,4,5-TP (Silvex) (Haz. Substance)	D017	93-72-1	9
Benzene	D018	71-43-2	3
Carbon Tetrachloride	D019	56-23-5	6.1
Chlordane (Haz. Substance)	D020	57-74-9	9
Chlorobenzene	D021	108-90-7	3
Chloroform	D022	67-66-3	6.1
O-Cresol	D023	95-48-7	6.1
M-Cresol	D024	108-39-4	6.1
P-Cresol	D025	106-44-5	6.1
Cresol	D026	1319-77-3	6.1
1,4-Dichlorobenzene	D027	106-46-7	6.1
1,2-Dichloroethane (Ethylene Dichloride)	D028	109-06-2	3
1,1-Dichloroethylene (Vinylidene Chloride)	D029	75-35-4	3
2,4-Dinitrotoluene	D030	121-14-2	6.1
Heptachlor (Haz. Substance)	D031	76-44-8	9
Hexachlorobenzene	D032	118-74-1	6.1
Hexachlorobutadiene	D033	87-68-3	6.1
Hexachloroethane (Haz. Substance)	D034	67-72-1	9
Methyl Ethyl Ketone (Ethyl Methyl Ketone)	D035	78-93-3	3
Nitrobenzene	D036	98-95-3	6.1
Pentachlorophenol (Haz. Substance)	D037	87-86-5	9
Pyridine	D038	110-86-1	3
Tetrachloroethylene	D039	127-18-4	6.1

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Trichloroethylene	D040	79-01-6	6.1
2,4,5-Trichlorophenol (Haz. Substance)	D041	95-95-4	9
2,4,6-Trichlorophenol (Haz. Substance)	D042	88-06-2	9
Vinyl Chloride	D043	110-86-1	2.1
Spent Halogenated Solvents (Haz. Substance)	F001	N/A	9
Spent Halogenated Solvents (Haz. Substance)	F002	N/A	9
Spent Non-Halogenated Solvents (Haz. Substance)	F003	N/A	9
Spent Non-Halogenated Solvents (Haz. Substance)	F004	N/A	9
Spent Non-Halogenated Solvents (Haz. Substance)	F005	N/A	9
Electroplating Sludges (Haz. Substance)	F006	N/A	9
Spent Cyanide Plating Solvents (Haz. Substance)	F007	N/A	9
Plating Bath Residues (Haz. Substance)	F008	N/A	9
Spent Stripping Solutions (Haz. Substance)	F009	N/A	9
Quenching Bath Residues (Haz. Substance)	F010	N/A	9
Spent Cyanide Solution (Haz. Substance)	F011	N/A	9
Quench Wastewater Sludge (Haz. Substance)	F012	N/A	9
Wastewater Treatment Sludge (Haz. Substance)	F019	N/A	9
Discarded Unused Formulations of Chlorophenols	F027	N/A	6.1
Chlorophenolic Residuals (Haz. Substance)	F032	N/A	9
Creosote Residuals (Haz. Substance)	F034	N/A	9
Arsenic/Chromium Residuals (Haz. Substance)	F035	N/A	9
Petroleum Refinery Primary Sludge (Haz. Substance)	F037	N/A	9
Petroleum Refinery Secondary Sludge (Haz. Subs.)	F038	N/A	9
Leachate from Wastes (Haz. Substance)	F039	N/A	9
Bottom Sediment Sludge	K001	NA	4.1, 9
Dissolved Air Float (Haz. Substance)	K048	N/A	9
Stop Oil Emulsion Solids (Haz. Substance)	K049	N/A	9
Heat Exchanger Sludge (Haz. Substance)	K050	N/A	9
API Separator Sludge (Haz. Substance)	K051	N/A	9
Petroleum Tank Bottoms (Haz. Substance)	K052	N/A	9
Emission Control Dust/Sludge (Haz. Substance)	K061	N/A	9
Spent Pickle Liquor (Haz. Substance)	K062	N/A	9
Solvent Washes & Sludge (Haz. Substance)	K086	N/A	9
Organic Wastes	K156	N/A	9
Wastewaters	K157	N/A	9
Baghouse Dusts & Filter Separator Solids	K158	N/A	9
Organics from Treatment of Thiocarbamate Wastes	K159	N/A	9
Solids	K160	N/A	9
Purification Solids	K161	N/A	9
Warfarin & Salts when >.03% (Haz. Substance)	P001	81-81-2	9
Acetamide, N-(Aminothioximethyl) (Haz. Substance)	P002	591-08-2	9
Acrolein	P003	107-02-8	6.1
Aldrin	P004	309-00-2	6.1

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Allyl Alcohol	P005	107-18-6	6.1
Aluminum Phosphide	P006	20859-73-8	4.3, 6.1
5-(Aminomethyl)-3-Isoxazolol (Haz. Substance)	P007	2763-96-4	9
4-Aminopyridine	P008	504-24-5	6.1
Arsenic Acid (H_3AsO_4)	P010	131-74-8	6.1
Arsenic Oxide (As_2O_5)	P011	1303-28-2	6.1
Arsenic Oxide (As_2O_3)	P012	1327-53-3	6.1
Barium Cyanide	P013	542-62-1	6.1
Benzenethiol (Phenyl Mercaptan)	P014	108-98-5	6.1
Beryllium (Powder)	P015	7440-41-7	6.1
Dichloromethylether ((Haz. Substance)	P016	542-88-1	9
Bromoacetone	P017	598-31-2	6.1
Brucine	P018	357-57-3	6.1
Dinoseb	P020	88-85-7	9
Calcium Cyanide	P021	592-01-8	6.1
Carbon Disulfide	P022	75-15-0	3, 6.1
Acetaldehyde, Chloro- (Haz. Substance)	P023	107-20-0	9
Benzenamine, 4-Chloro- (Haz. Substance)	P024	106-47-8	9
1-(o-Chlorophenyl)thiourea (Haz. Substance)	P026	5344-82-1	9
3-Chloropropionitrile (Haz. Substance)	P027	542-76-7	9
Benzene, Chloromethyl (Benzyl Chloride)	P028	100-44-7	6.1
Copper Cyanide	P029	544-92-3	6.1
Cyanides (Solutions & Inorganics)	P030	57-12-5	6.1
2-Cyclohexyl-4,6-dinitrophenol (Haz. Substance)	P034	131-89-5	9
Arsonous Dichloride, Phenyl (Haz. Substance)	P036	696-28-6	9
Dieldrin	P037	60-57-1	6.1
Arsine, Diethyl- (Haz. Substance)	P038	692-42-2	9
Disulfoton (Haz. Substance)	P039	298-04-4	9
0,0-Diethyl 0-pyrazinyl Phosphorothioate (Haz. Subs.)	P040	297-97-2	9
Diethyl-p-nitrophenyl Phosphate (Haz. Substance)	P041	311-45-5	9
Epinephrine	P042	329-65-7	6.1
Diisopropylfluorophosphate (Haz. Substance)	P043	55-91-4	9
Dimethoate (Haz. Substance)	P044	60-51-5	9
Thiofanox (Haz. Substance)	P045	39196-18-4	9
Benzeneethanamine, alpha, alpha-dimethyl (Haz. Subs.)	P046	122-09-8	9
4,6-Dinitro-o-cresol & Salts (Solid or Solutions)	P047	534-52-1	6.1
2,4-Dinitrophenol (Haz. Substance)	P048	51-28-5	9
Dithiobiuret (Haz. Substance)	P049	541-53-7	9
Endosulfan (Haz. Substance)	P050	115-29-7	9
Endrin (Haz. Substance)	P051	72-20-8	9

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Aziridine (Ethyleneimine)	P054	151-56-4	6.1
Acetamide, 2-Fluoro- (Haz. Substance)	P057	640-19-7	9
Acetic Acid, Fluoro-, Sodium Salt (Haz. Substance)	P058	62-74-8	9
Heptachlor (Haz. Substance)	P059	76-44-8	9
Isodrin (Haz. Substance)	P060	465-73-6	9
Hexaethyl Tetraphosphate	P062	757-58-4	6.1
Hydrogen Cyanide	P063	74-90-8	6.1, 3
Methyl Isocyanate	P064	624-83-9	6.1
Methomyl (Haz. Substance)	P066	16752-77-5	9
Aziridine, 2-methyl	P067	75-55-8	3
Methyl Hydrazine (Haz. Substance)	P068	60-34-4	9
2-Methyllactonitrile	P069	75-86-5	6.1
Aldicarb (Haz. Substance)	P070	116-06-3	9
Methyl Parathion	P071	298-00-0	6.1
alpha-Naphthylthiourea	P072	86-88-4	6.1
Nickel Carbonyl	P073	13463-39-3	6.1, 3
Nickel Cyanide	P074	577-19-7	6.1
Nicotine & Salts	P075	54-11-5	6.1
Benzenamine, 4-Nitro- (p-Nitroaniline)	P077	100-01-6	6.1
Nitroglycerine	P081	55-63-0	3, 4.1
N-Nitrosodimethylamine (Haz. Substance)	P082	62-75-9	9
N-Nitrosomethylvinylamine (Haz. Substance)	P084	4549-40-0	9
Octamethylpryophosphoramide (Haz. Substance)	P085	152-16-9	9
Osmium Tetroxide	P087	20816-12-0	6.1
Endothall (Haz. Substance)	P088	145-73-3	9
Parathion	P089	56-38-2	6.1
Phenylmercury Acetate	P092	62-38-4	6.1
Phenylthiourea (Haz. Substance)	P093	103-85-5	9
Phorate (Haz. Substance)	P094	298-02-2	9
Famphur (Haz. Substance)	P097	52-85-7	9
Potassium Cyanide	P098	151-50-8	6.1
Potassium Silver Cyanide (Haz. Substance)	P099	506-61-6	9
Ethyl Cyanide (Haz. Substance)	P101	107-12-0	9
Propargyl Alcohol	P012	107-19-7	3
Selenourea (Haz. Substance)	P103	630-10-4	9
Silver Cyanide	P104	506-64-9	6.1
Sodium Azide	P105	26628-22-8	6.1
Sodium Cyanide	P106	143-33-9	6.1
Strychnine & Salts	P108	57-24-9	6.1
Tetraethyldithiopryophosphate	P109	3689-24-5	6.1
Tetraethyl Lead (Liquid)	P110	78-00-2	6.1
Tetraethyl Pryophosphate (Liquid & Solid)	P111	107-49-3	6.1

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Thallic Oxide (Haz. Substance)	P113	1314-32-5	9
Thallium (1) Selenide (Thallium Compounds)	P114	12039-62-0	6.1
Thallium (1) Sulfate (Thallium Compounds)	P115	7446-18-6	6.1
Thiosemicarbazide (Haz. Substance)	P116	79-19-6	9
Perchloromethylmercaptan	P118	594-42-3	6.1
Ammonium Vanadate (Ammonium Metavanadate)	P119	7803-55-6	6.1
Vanadium Pentoxide (Nonfused Form)	P120	1314-62-1	6.1
Zinc Cyanide	P121	557-21-1	6.1
Zinc Phosphide	P122	1314-84-7	4.3, 6.1
Toxaphene (Haz. Substance)	P123	8001-35-2	9
Carbofuran	P127	1563-66-2	6.1
Mexacarbate	P128	315-18-4	6.1
Tirpate	P185	26419-73-8	6.1
Physostigmine Salicylate	P188	57-64-7	6.1
Carbosulfan	P189	55285-14-8	9
Metolcarb	P190	1129-41-5	6.1
Dimetilan	P191	644-64-4	6.1
Isolan	P192	119-38-0	6.1
Oxamyl	P194	23135-22-0	6.1
Manganese Dimethyldithiocarbamate	P196	15339-36-3	6.1
Formparanate	P197	17702-57-7	6.1
Formetanate Hydrochloride	P198	23422-53-9	6.1
Methiocarb	P199	2032-65-7	6.1
Promecarb	P201	2631-37-0	6.1
m-Cumenyl Methylcarbamate	P202	64-00-6	6.1
Aldicarb Sulfone	P203	1646-88-4	6.1
Physostigmine	P204	57-47-6	6.1
Ziram	P205	137-30-4	6.1
Acetaldehyde (I)	U001	75-07-0	3
Acetone (I)	U002	67-64-1	3
Acetonitrile (I, T) (Methyl Cyanide)	U003	75-05-8	3
Acetophenone (Haz. Substance)	U004	98-86-2	9
2-Acetylaminofluorene (Haz. Substance)	U005	53-96-3	9
Acetyl Chloride	U006	75-36-5	3, 8
Acrylamide	U007	79-06-1	6.1
Acrylic Acid	U008	79-10-7	8
Acrylonitrile	U009	107-13-1	3
Mitomycin C (Haz. Substance)	U010	50-07-7	9
Amitrole (Haz. Substance)	U011	61-82-5	9
Aniline (I, T)	U012	62-53-3	6.1
Auramine (Haz. Substance)	U014	492-80-8	9

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Azaserine (Haz. Substance)	U015	115-02-6	9
Benz(c)acridine (Haz. Substance)	U016	225-51-4	9
Benzal Chloride (Haz. Substance)	U017	98-87-3	9
Benz(a)athracene (Haz. Substance)	U018	56-55-3	9
Benzene	U019	71-43-2	3
Benzenesulfonyl Chloride	U020	98-09-9	8
Benzidine	U021	62-53-3	6.1
Benzo(a)pyrene (Haz. Substance)	U022	50-32-8	9
Benzotrichloride	U023	98-07-7	8
Dichloromethyoxy Ethane (Haz. Substance)	U024	111-91-1	9
Dichloroethyl Ether (Haz. Substance)	U025	111-44-4	9
Chlornaphazine (Haz. Substance)	U026	494-03-1	9
Dichloroisopropyl Ether	U027	108-60-1	6.1
Diethylhexyl Phthalate (Haz. Substance)	U028	117-81-7	9
Methyl Bromide	U029	74-83-9	2.3
4-Bromophenyl Phenyl Ether (Haz. Substance)	U030	101-55-3	9
n-Butyl Alcohol (I) (Butanols)	U031	71-36-3	3
Calcium Chromate (Haz. Substance)	U032	13765-19-0	9
Chloral (anhydrous)	U034	75-87-6	6.1
Chlorambucil (Haz. Substance)	U035	305-03-3	9
Chlordane, Alpha & Gamma Isomers (Haz. Substance)	U036	57-74-9	9
Chlorobenzene	U037	108-90-7	3
Chlorobenzilate (Haz. Substance)	U038	510-15-6	9
p-Chloro-m-cresol	U039	59-50-7	6.1
Epichlorohydrin	U041	106-89-8	6.1
2-Chloroethyl Vinyl Ether (Haz. Substance)	U042	110-75-8	9
Vinyl Chloride	U043	75-01-4	2.1
Chloroform	U044	67-66-3	6.1
Methyl Chloride (I, T)	U045	74-87-3	2.1
Chloromethyl Methyl Ether	U046	107-30-2	3
beta-Chloronaphthalene (Haz. Substance)	U047	91-58-7	9
o-Chlorophenol	U048	95-57-8	6.1
4-Chloro-o-toluidine, Hydrochloride	U049	3165-93-3	6.1
Chrysene (Haz. Substance)	U050	218-01-9	9
Creosote (Haz. Substance)	U051	8001-58-9	9
Cresol	U052	1319-77-3	6.1
Crotonaldehyde (Stabilized)	U053	4170-30-3	3
Cumene (I) (Haz. Substance)	U055	98-82-8	9
Cyclohexane	U056	110-82-7	3
Cyclohexanone (I)	U057	108-94-1	3
Cyclophosphamide (Haz. Substance)	U058	50-18-0	9

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Daunomycin (Haz. Substance)	U059	20830-81-3	9
DDD (Haz. Substance)	U060	72-54-8	9
DDT (Haz. Substance)	U061	50-29-3	9
Diallate (Haz. Substance)	U062	2303-16-4	9
Diben(a, h)anthracene (Haz. Substance)	U063	53-70-3	9
Dibenzo(a, i)pyrene (Haz. Substance)	U064	189-55-9	9
1,2-Dibromomo-3-chloropropane	U066	96-12-8	6.1
Ethane, 1,2-dibromo- (Ethylene Dibromide)	U067	106-93-4	6.1
Methylene Bromide (Dibromomethane)	U068	74-95-3	6.1
Dibutyl Phthalate (Haz. Substance)	U069	84-74-2	9
o-Dichlorobenzene	U070	95-50-1	6.1
m-Dichlorobenzene (Haz. Substance)	U071	541-73-1	9
p-Dichlorobenzene	U072	106-46-7	6.1
3,3-Dichlorobenzidine (Haz. Substance)	U073	91-94-1	9
1,4-Dichloro-2-butene (I,T) (Haz. Substance)	U074	764-41-0	9
Dichlorodifluoromethane	U075	75-71-8	2.2, 6.1
Ethane, 1,1-Dichloro- (1,1-Dichloroethane)	U076	75-34-3	3
Ethane, 1,2-Dichloro- (Ethylene Dichloride)	U077	107-06-2	3
1,1-Dichloroethylene (Haz. Substance)	U078	75-35-4	9
1,2-Dichloroethylene (Haz. Substance)	U079	156-60-5	9
Methylene Chloride (Dichloromethane)	U080	75-090-2	6.1
2,4-dichlorophenol (Haz. Substance)	U081	120-83-2	9
2,6-Dichlorophenol (Haz. Substance)	U082	87-65-0	9
Propylene Dichloride	U083	78-87-5	3
1,3-Dichloropropene (Dichloropropene)	U084	542-75-6	3
1,2:3,4-Diepoxybutane (Haz. Substance)	U085	1464-53-5	9
N,N'-Diethyhydrazine (Haz. Substance)	U086	1615-80-1	9
O,O-Diethyl S-methyl Dithiophosphate (Haz. Subs.)	U087	3288-58-2	9
Diethyl Phthalate (Haz. Substance)	U088	84-66-2	9
Diethystilbesterol (Haz. Substance)	U089	56-53-1	9
Dihydrosafrole (Haz. Substance)	U090	94-58-6	9
3,3'-Dimethoxybenzidine (Haz. Substance)	U091	119-90-4	9
Dimethylamine (I) (Anhydrous, Solution)	U092	124-40-3	2.1, 3
p-Dimethylaminoazobenzene (Haz. Substance)	U093	60-11-7	9
7,12-Dimethylbenz(a)anthracene (Haz. Substance)	U094	57-97-6	9
3,3'-Dimethylbenzidine (Haz. Substance)	U095	119-93-7	9
Dimethylcarbamoyl Chloride	U097	79-44-7	8
1,1-Dimethylhydrazine (Symmetrical, Unsymm.)	U098	57-14-7	3, 6.1
1,2-Dimethylhydrazine (Symmetrical, Unsymm.)	U099	540-73-8	3, 6.1
2,4-Dimethylphenol (Haz. Substance)	U101	105-67-9	9
Dimethyl Phthalate (Haz. Substance)	U102	131-11-3	9
Dimethyl Sulfate	U103	77-78-1	6.1

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
2,4-Dinitrotoluene	U105	121-14-2	6.1
2,6-Dinitrotoluene	U106	606-20-2	6.1
Di-n-Octyl Phthalate (Haz. Substance)	U107	117-84-0	9
1,4-Dioxane	U108	123-91-1	3
1,2-Diphenylhydrazine (Haz. Substance)	U109	122-66-7	9
Dipropylamine	U110	142-84-7	3
Di-n-propylnitrosoamine (Haz. Substance)	U111	621-64-7	9
Ethyl Acetate (I)	U112	141-78-6	3
Ethyl Acrylate (I)	U113	140-88-5	3
Ethylene Bisdithiocarbamic Acid, Salts & Esters (Haz. Substance)	U114	111-54-6	9
Ethylene Oxide (I, T)	U115	75-21-8	2.3
Ethylenthiourea (Haz. Substance)	U116	96-45-7	9
Ethyl Ether (I) (Diethyl Ether)	U117	60-29-7	3
Ethyl Methacrylate	U118	97-63-2	3
Ethyl Methanesulfonate (Haz. Substance)	U119	62-50-0	9
Fluoranthene (Haz. Substance)	U120	206-44-0	9
Trichloromonofluoromethane (Haz. Substance)	U121	75-69-4	9
Formaldehyde (Solutions-Flammable, Non-Flammable)	U122	50-0-0	3, 9
Formic Acid (C, T)	U123	64-18-6	8
Furan (I)	U124	110-00-9	3
Furfural (I)	U125	98-01-1	3
Glycidylaldehyde	U126	765-34-4	3
Hexachlorobenzene	U127	118-74-1	6.1
Hexachlorobutadiene	U128	87-68-3	6.1
Lindane (Haz. Substance)	U129	58-89-9	9
Hexachlorocyclopentadiene	U130	77-47-4	6.1
Hexachloroethane (Haz. Substance)	U131	67-72-1	9
Hexachlorophene	U132	710-30-4	6.1
Hydrazine (R, T)	U133	302-01-2	3, 6.1, 8
Hydrofluoric Acid (C, T)	U134	7664-39-3	8
Hydrogen Sulfide	U135	7783-06-4	2.3, 2.1
Cacodylic Acid	U136	75-60-5	6.1
Ideno[1,2,3-cd]pyrene (Haz. Substance)	U137	193-39-9	9
Methyl Iodide	U138	74-88-4	6.1
Isobutyl Alcohol (I, T,) (Isobutanol)	U140	78-83-1	3
Isosafrole (Haz. Substance)	U141	120-58-1	9
Kepone (Haz. Substance)	U142	143-50-0	9
Lasiocarpine (Haz. Substance)	U143	303-34-4	9
Lead Acetate	U144	301-04-2	6.1

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Lead Phosphate (Haz. Substance)	U145	7446-27-7	9
Lead Subacetate (Haz. Substance)	U146	1335-32-6	9
Maleic Anhydride	U147	108-31-6	8
Maleic Hydrazide (Haz. Substance)	U148	123-33-1	9
Malononitrile	U149	109-77-3	6.1
Melphalan (Haz. Substance)	U150	148-82-3	9
Mercury	U151	7439-97-6	8
Methacrylonitrile	U152	126-98-7	3
Methanethiol	U153	74-93-1	2.3, 2.1
Methanol (I)	U154	67-56-1	3
Methapyrilene (Haz. Substance)	U155	91-80-5	9
Methyl Chlorocarbonate (Methyl Chloroformate)	U156	79-22-1	6.1
3-Methylcholanthrene (Haz. Substance)	U157	56-49-5	9
4,4'-Methylenebis(2-Chloraniline) (Haz. Substance)	U158	101-14-4	9
Methyl Ethyl Ketone (I, T) (Ethyl Methyl Ketone)	U159	78-93-3	3
Methyl Ethyl Ketone Peroxide (R, T)	U160	1338-23-4	5.2
Methyl Isobutyl Ketone	U161	108-10-1	3
Methyl Methacrylate (I, T) (Monomer)	U162	80-62-6	3
N-Methyl-N'-Nitro-N-Nitrosognanidine	U163	10-25-7	4.1
Methylthiouracil (Haz. Substance)	U164	56-04-2	9
Naphthalene (Crude or Refined)	U165	91-20-3	4.1
1,4-Naphthalenedione (Haz. Substance)	U166	130-15-4	9
alpha-Naphthylamine	U167	134-32-7	6.1
beta-Naphthylamine	U168	91-59-8	6.1
Nitrobenzene (I, T)	U169	98-95-3	6.1
p-Nitrophenol	U170	100-02-7	6.1
Nitropropane (I, T)	U171	79-46-9	3
N-Nitrosodi-n-butylamine (Haz. Substance)	U172	924-16-3	9
N-Nitrosodiethanolamine (Haz. Substance)	U173	1116-54-7	9
N-Nitrododiethylamine (Haz. Substance)	U174	55-18-5	9
N-Nitroso-N-ethylurea (Haz. Substance)	U176	759-73-9	9
N-Nitroso-N-Methylurea (Haz. Substance)	U177	684-93-5	9
N-Nitroso-N-Methylurethane (Haz. Substance)	U178	615-53-2	9
N-Nitrosopiperidine (Haz. Substance)	U179	100-75-4	9
N-Nitrasopyrrolidine (Haz. Substance)	U180	930-55-2	9
5-Nitro-o-toluidine (mono)	U181	99-55-8	6.1
Paraldehyde	U182	123-63-7	3
Pentachlorobenzene (Haz. Substance)	U183	608-93-5	9
Pentachloroethane	U184	76-01-7	6.1
Pentachloronitrobenzene (Haz. Substance)	U185	82-68-8	9
1,3-Pentadiene (I) (Haz. Substance)	U186	504-60-9	9

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Phenacetin (Haz. Substance)	U187	62-44-2	9
Phenol (molten, solid, solutions)	U188	108-95-2	6.1
Phosphorus Sulfide	U189	1314-80-3	4.3, 4.1
Phthalic Anhydride	U190	85-44-9	8
2-Picoline	U191	109-06-8	3
Pronamide (Haz. Substance)	U192	23950-58-5	9
1,3-Propane Sultone (Haz. Substance)	U193	1120-71-4	9
n-Propylamine (I, T)	U194	107-10-8	3
Pyridine	U196	110-86-1	3
p-Benzoquinone	U197	106-51-4	6.1
Reserpine (Haz. Substance)	U200	50-55-5	9
Resorcinol	U201	108-46-3	6.1
Saccharin, & Salts (Haz. Substance)	U202	81-07-2	9
Safrole (Haz. Substance)	U203	94-59-7	9
Selenium Dioxide (Selenium Oxide)	U204	7446-08-4	6.1
Selenium Sulfide	U205	7488-56-4	6.1
Streptozotocin (Haz. Substance)	U206	18883-66-4	9
1,2,4,5-Tetrachlorobenzene (Haz. Substance)	U207	95-94-3	9
1,1,1,2-Tetrachloroethane (Haz. Substance)	U208	630-20-6	9
1,1,2,2-Tetrachloroehtane (Haz. Substance)	U209	79-34-5	9
Tetrachloroethylene	U210	127-18-4	6.1
Carbon Tetrachloride	U211	56-23-5	6.1
Tetrahydrofuran (I)	U213	109-99-9	3
Thallium (I) Acetate (Thallium Compound)	U214	563-68-8	6.1
Thallium (I) Carbonate (Thallium Compound)	U215	6533-73-9	6.1
Thallium (I) Chloride (Thallium Compound)	U216	7791-12-0	6.1
Thallium (I) Nitrate (Thallium Compound))	U217	10102-45-1	6.1, 5.1
Thioacetamide (Haz. Substance)	U218	62-55-5	9
Thiourea (Haz. Substance)	U219	62-56-6	9
Toluene	U220	108-88-3	3
Toluenediamine (Haz. Substance)	U221	25376-45-8	9
o-Toluidine Hydrochloride (Haz. Substance)	U222	636-21-5	9
Toluene Diisocyanate	U223	26471-62-5	6.1
Bromoform	U225	75-25-2	6.1
Methyl Chloroform (1,1,1-Trichloroethane)	U226	71-55-6	6.1
1,1,2-Trichloroethane (Haz. Substance)	U227	79-00-5	9
Trichloroethylene	U228	79-01-6	6.1
Tris(2,3-dibromopropyl)phosphate (Haz. Substance)	U235	126-72-7	9
Trypan Blue (Haz. Substance)	U236	72-57-1	9
Uracil Mustard (Haz. Substance)	U237	66-75-1	9
Ethyl Carbamate (Urethane) (Haz. Substance)	U238	51-79-6	9

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Xylene (I)	U239	1330-20-7	3
2,4-D Salts & Esters (Haz. Substance)	U240	94-75-7	9
1-Propene 1,1,2,3,3,3-hexachloro (Haz. Substance)	U243	1888-71-7	9
Thiram (Haz. Substance)	U244	137-26-8	9
Cyanogen Bromide	U246	506-68-3	6.1
Methoxychlor (Haz. Substance)	U247	72-43-5	9
Warfarin & Salts (≤0.3%) (Haz. Substance)	U248	81-81-2	9
Zinc Phosphide	U249	1314-84-7	4.3, 6.1
Benoyml	U271	17804-35-2	9
Sulfallate	U277	95-06-7	9
Bendiocarb	U278	22781-23-3	6.1
Carbaryl	U279	63-25-2	9
Barban	U280	101-27-9	9
o-Toluidine	U328	95-53-0	6.1
p-Toluidine	U353	106-49-0	6.1
Ethylene Glycol Monoethyl Ether	U359	110-80-5	3
Bendiocarb Phenol	U364	22961-82-6	6.1
Molinate	U365	2212-67-1	9
Dazomet	U366	533-74-4	9
Carbofuran Phenol	U367	1563-38-8	6.1
Carbendazin	U372	10605-21-7	9
Propham	U373	122-42-9	9
3-Iodo-2-propynyl n-butylcarbamate	U375	55406-53-6	9
Selenium, Tetrakis (Dimethyldithiocarbamate)	U376	144-34-3	6.1
Potassium n-Methyldithiocarbamate	U377	137-41-7	9
Potassium n-Hydroxymethyl-n-methyldithiocarbamate	U378	51026-28-9	9
Sodium Dibutyldithiocarbamate	U379	136-30-1	9
Sodium Diethyldithiocarbamate	U381	148-18-5	9
Sodium Dimethyldithiocarbamate	U382	128-04-1	9
Potassium Dimethyldithiocarbamate	U383	128-03-0	9
Metam-sodium	U384	137-42-8	8
Vernolate	U385	1929-77-7	9
Cycloate	U386	1134-23-2	9
Prosulfocarb	U387	52888-80-9	9
Triallate	U389	2303-17-5	9
EPTC	U390	759-94-4	9
Pebulate	U391	1114-71-2	9
Butylate	U392	2008-41-5	9
Copper Dimethyldithiocarbamate	U393	137-29-1	6.1
A2213	U394	30558-43-1	9
Diethylene Glycol, Dicarbamate	U395	5952-26-1	6.1

Table II.A.4.b.-3 (continued)
Waste Permitted to be Stored at Perma-Fix of Orlando, Inc.

Waste Description	Hazardous Waste Code	CAS Registry Number	Hazard Class
Ferbam	U396	14484-64-1	9
Bis(pentamethylene) Thiruam Tetrasulfide	U400	120-54-7	9
Tetramethylthiuram Monosulfide	U401	97-74-5	9
Tetrabutylthiuram Disulfide	U402	1634-02-2	9
Disulfiram	U403	97-77-8	9
Triethylamine	U404	121-44-8	3
Ethyl Ziram	U407	14324-55-1	9
Thiophanate-Methyl	U409	23564-05-8	9
Thiodicarb	U410	59669-26-0	9
Propoxur	U411	114-26-1	6.1

N/A: Not Applicable, None Found

Table II.A.4.b.-4

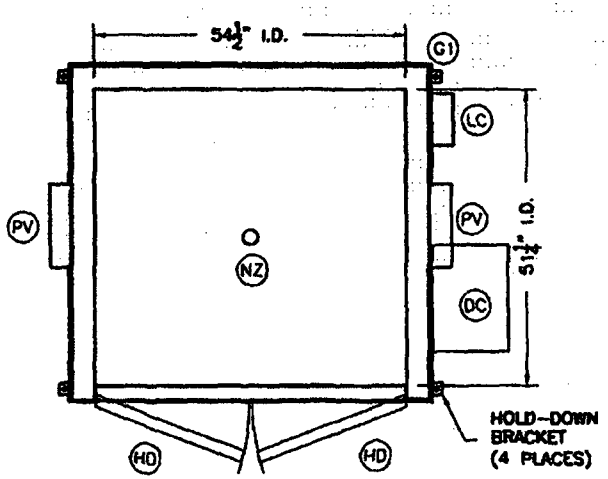
Emergency Equipment and Personnel Safety Equipment Cabinet

2	Empty 55-gallon, 17-H, lined drums
2	Salvage drums (lined or poly)
4	8-inch diameter, 10-foot long sorbent booms
2	Spark-resistant safety shovels
2	Crowbars (nonsparking)
2	18-inch pipe wrenches (nonsparking)
2	Drum plug wrenches (nonsparking)
4	Explosion-proof flashlights
1	Megaphone
2	Nylon ropes (each 50 feet long, ½ inch thick)
1	Oxygen kit
5	Safety glasses
10	Safety goggles
5	Face shield/hard hat combination
2	Emergency eye/face/body wash
20	Tyveks total body coverage
4	Duct tape rolls
10	Rubber boots
10	Rubber gloves
5	Corrosive-resistant aprons
2	Corrosive-resistant suits
5	Leather gloves
10	Half-mask respirators
5	Full-face respirators
1	Box of respirator cartridges (OV and AG)

Exhibit II.B.1.2: HAZMAT STORAGE LOCKER SKETCH

MODEL: P19-1[illegible]0	**CUSTOMER:** PERMA-FIX				
DESCR.: HAZMAT STORAGE LOCKER	**DRAWN BY:** PVH	**DATE:** 9-24-07	**APPROVAL SIGNATURE**		
DWG NUMBER: 0708025FL	**REVISION:** 00	**ORDER NO.:** 1002845	**SHEET:** 1 OF 1	**DATE:**	

DENIOS
"Compliant Storage Systems for Hazardous Material"



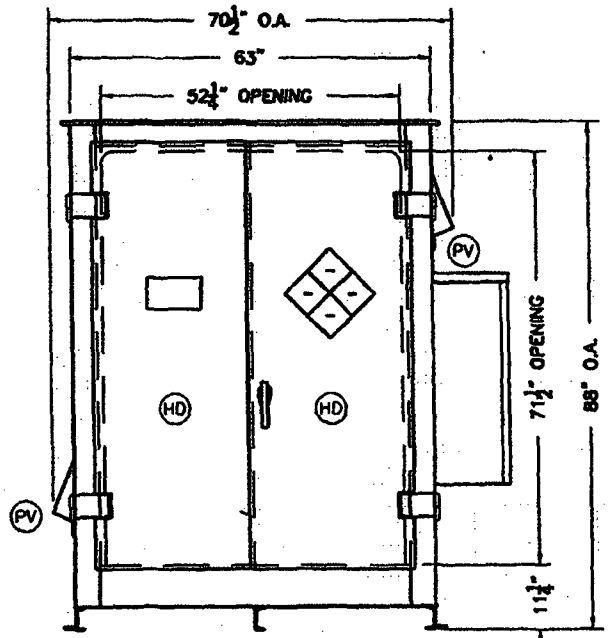
PLAN VIEW

GENERAL SPECIFICATIONS:

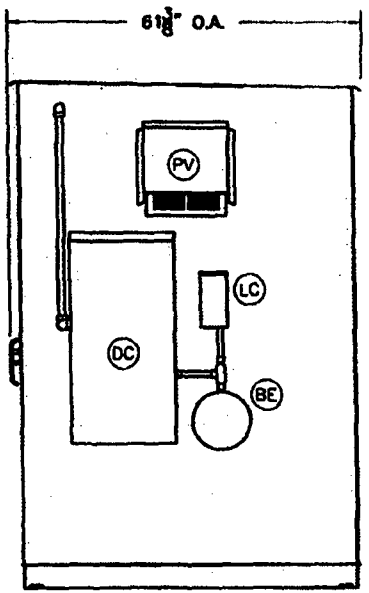
STORAGE CAPACITY:	4 EA. 55-GAL DRUMS
UNIT EST. WEIGHT:	2,900 LBS.
CONSTRUCTION:	2 HR FIRE RATED
DOORS:	HINGED DOORS
SUMP VOLUME:	72 GAL.

LEGEND

G1-EXTERIOR GROUNDING LUG
HD-HINGED DOOR
PV-PASSIVE VENT
LC-LOAD CENTER
DC-DRY CHEM FIRE SUPPRESSION
NZ-NOZZLE FOR DRY CHEM
BE-BELL



FRONT VIEW



RIGHT SIDE VIEW

Facility SPCC Plan

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Perma-Fix of Orlando, Inc.

June 1, 2006
Revised November 17, 2008
Revised May 2010

Prepared for:

Perma-Fix of Orlando, Inc.
10100 Rocket Blvd.
Orlando, FL 32824

Project No. 100101

SCHREIBER & YONLEY ASSOCIATES
ENVIRONMENTAL ENGINEERS

16252 Westwoods Business Park Drive • Ellisville, MO 63021 • (636) 256-7200
www.perma-fix.com/sya

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Perma-Fix of Orlando, Inc.

MANAGEMENT APPROVAL

This is to certify that I have the authority to commit resources as necessary to implement this Spill Prevention, Control, and Countermeasure Plan.

This Spill Prevention, Control, and Countermeasure Plan will be implemented as herein described.

SIGNATURE: Corey J Howard

NAME: Corey Howard

TITLE: Facility Manager

DOCUMENTATION OF REVIEW OF SPCC PLAN IN ACCORDANCE WITH 40 CFR 112.5(b)

A review and evaluation of the Spill Prevention, Control, and Countermeasure (SPCC) Plan must be completed at least once every five years.

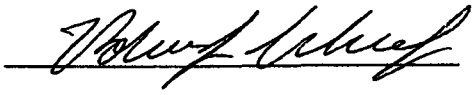
I have completed a review and evaluation of the Spill Prevention, Control, and Countermeasure Plan for Perma-Fix of Orlando, FL and will amend the Plan if required.

REVIEW DATE	WILL AMEND	WILL NOT AMEND	NAME, TITLE, AND SIGNATURE OF PERSON REVIEWING THIS PLAN

PROFESSIONAL ENGINEER'S CERTIFICATION

I hereby certify that I, or my authorized representative, have examined the Perma-Fix of Orlando, Inc. in Orlando, FL and, being familiar with the provisions of 40 CFR 112, attest that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practices.

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 gathered and evaluated 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 fine and imprisonment for knowing violations.

Signature:	
Printed Name:	Robert J. Schreiber, Jr.
Title:	President
Company:	Schreiber, Yonley & Associates
P.E. License No.:	46126
Date:	4/26/2010

REVISION HISTORY

Revision #	Date	Description of Change	Pages Affected
0	6/1/2006	Initial Release	
1	11/17/2008	Used oil activities moved from General Drive to Rocket Blvd.	several
2	May 2010	Added new trucks, double-walled, 2-compartment tank, and modified personnel information. Changed format and updated to current regulations.	Several, complete re-write.

TABLE OF CONTENTS

TABLES

FIGURES

APPENDICES

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

SECTION 1

INTRODUCTION

In December 1973, the United States Environmental Protection Agency (U.S. EPA) promulgated regulations that established procedures and required equipment to prevent the discharge of oil from non-transportation-related facilities into or upon the navigable waters of the United States. These regulations, which are codified in 40 CFR 112, were issued pursuant to Section 311(j)(1)(c) of the Federal Water Pollution Control Act (as amended). These regulations underwent a major revision on July 17, 2002, and were amended several times since then, including December 5, 2008, with the compliance date being extended several times. The regulations apply to facilities that store petroleum materials in excess of 1,320 gallons above ground (only containers of 55 gallons or more used for storage are counted) and/or facilities that store greater than 42,000 gallons of petroleum materials under ground. This Spill Prevention, Control, and Countermeasure Plan (SPCC Plan or Plan) has been prepared for the petroleum storages within the Perma-Fix of Orlando, Inc. facility in Orlando FL. Table 1 provides a summary of the petroleum product storages provided at this facility. Figure 1 shows the facility location. Figure 2 shows the site layout, site drainage, and petroleum storage areas.

Section 2 of this Plan provides detailed information regarding the facility and its storage locations. Section 3 provides a discussion of facility conformance to the regulations in the format of the regulations. Section 4 provides spill response procedures to be implemented in the event of a spill. Finally, Section 5 provides information regarding the necessity and timing required for SPCC Plan updates.

SECTION 2

FACILITY IDENTIFICATION

FACILITY:	Perma-Fix of Orlando, Inc.
FACILITY NAME & LOCATION:	Perma-Fix of Orlando, Inc. 10100 Rocket Blvd. Orlando, FL 32824
FACILITY PHONE NO.	407-859-4441
NAME OF RESPONSIBLE PERSON AT THE FACILITY:	Cory Howard, Facility Manager
DESCRIPTION OF ACTIVITIES:	Registered used oil transporter and transfer facility. Also permitted solid waste facility and permitted hazardous waste facility.
PETROLEUM STORAGE CAPACITY:	Total storage capacity of approximately 23,000 gallons. The largest tank is a two-compartment double-walled tank with compartments of 15,000 and 7,000 gallons with a total capacity of 22,000 gallons. Facility will occasionally park loaded trucks overnight in secondary containment to be offloaded the next working day.
GEOGRAPHIC LOCATION:	Latitude N 28.4178708 Longitude W -81.3864878
DESCRIPTION OF NEARBY NAVIGABLE WATER THAT COULD BE IMPACTED:	Unnamed drainage ditch that flows to Boggy Creek, which lies east of the facility.
DATE OF INITIAL OPERATION	Approximately 1999

FACILITY DESCRIPTION:

Perma-Fix of Orlando, Inc. (PFO) is a registered used oil transporter and transfer facility located at 10100 Rocket Blvd. in Orlando, Florida. PFO is subject to 40 CFR 279 and applicable state regulations covering used oil management. Bulk used oil is transported to the facility and stored in the double-walled tank. PFO may also collect used oil from municipally organized Household Hazardous Waste Collection Facilities (HHW).

Oily water, off-specification fuel, oil filters, used antifreeze, and other non-hazardous wastes and wastewaters are received at the facility and containerized. The solid (non-hazardous) waste facility stores and consolidates non-hazardous wastes. Non-hazardous liquids and semi-solid wastes may be processed with an inert material for the purpose of solidifying them and rendering them compliant for transportation and disposal. Wastes may be sorted in tanker trucks, drums, totes, dump trailers, and roll-off containers. The facility also collects used oil filters, which are transferred from drums into a covered roll-off container.

The facility's three trucks are typically parked empty in the outside parking area overnight. Occasionally, when the trucks are parked overnight containing oil or other petroleum material, they park in one of two covered spots inside the waste consolidation building.

The facility is also a permitted RCRA hazardous waste facility (EPA ID number FLD 980 559 728) and a permitted solid waste (Permit Number SO48-0288830-001) transfer station/volume reduction facility/waste processing facility. The facility also is a RCRA hazardous waste 10-day transfer station. Wastes are not disposed of at this facility.

TABLE 1

SUMMARY OF STORAGE LOCATIONS LOADING AREAS AND MOBILE CONTAINERS

IDENTIFIER	MATERIAL STORED	MAXIMUM QUANTITY STORED (GALLONS)	SECONDARY CONTAINMENT
OIL STORAGE BULK CONTAINERS AND TRUCKS			
Tank No. 1A	Used oil	15,000	Double-walled tank
Tank No. 1B	Off-Spec Fuel or Oily Water	7,000	Double-walled tank
Tank Truck*	Used Oil, Oily Water	0-6,000	6,000 gallon inside waste consolidation building
Vacuum Truck No. 1*	Used Oil/Oily Water/Sludge	0-3,500	
Vacuum Truck No. 2*	Used Oil/Oily Water/Sludge	0-3,000	
HW Drum Storage Area	Hazardous and non-hazardous waste, occasionally 1-20 drums of oil filters or other petroleum materials	45,320 maximum for all types of waste material	9,500 gallon secondary containment consisting of concrete curb and floor inside building
NON-PETROLEUM BULK CONTAINERS			
Tote Storage	Antifreeze Totes 250 gal to 550 gal	0-4,000	6,000 gallon inside waste consolidation area
LOADING/UNLOADING AREAS			
Loading/ Unloading Area	NONE	NONE	2,600 gallons

*Note: The trucks are typically empty and parked in the outside parking area. When the trucks are parked overnight containing oil or other petroleum material, they park in one of two covered spots inside the waste consolidation building.

TABLE 2

POTENTIAL SPILLS

Source of Spill	Location	Potential Type Of Failure	Estimated Quantity (gallons)	Rate of Spill (gal/hr)	Direction Of Spill	Secondary Containment	Potential for Occurrence
Truck Loading/ Unloading	West of used oil tank	Tanker leakage	Up to 6,000	Varies	North toward secondary containment	2,600 gallon concrete and asphalt	Low as personnel are always present
		Transfer hose damage	Varies	Varies			Low due to inspections and high visibility
Aboveground Storage Tank	West of main building	Overfilling	Varies	Varies	North	Concrete and asphalt	Low due to loading procedures
		Transfer hose damage	Up to 15,000	Varies	North		Low due to inspections and high visibility
		Tank leakage or failure	Up to 15,000	Varies	North	Double-walled tank	Low due to periodic testing of interstitial space
Trucks parked overnight	Waste consolidation building	Tanker leakage	Up to 6,000	Varies	North	6,000 gallon inside waste consolidation building	Low due to periodic truck inspections
HW Drum Storage	Container storage Unit	Drum damaged or fails	55	Slow	Remain in secondary containment	9,500 gallon concrete	Low

In the unlikely event of a major release of material and failure of the secondary containments, it appears that a product spill would flow to the stormwater retention basin at the northern portion of the facility, then south through an underground pipe to a drainage ditch, and then to the east to Boggy Creek.

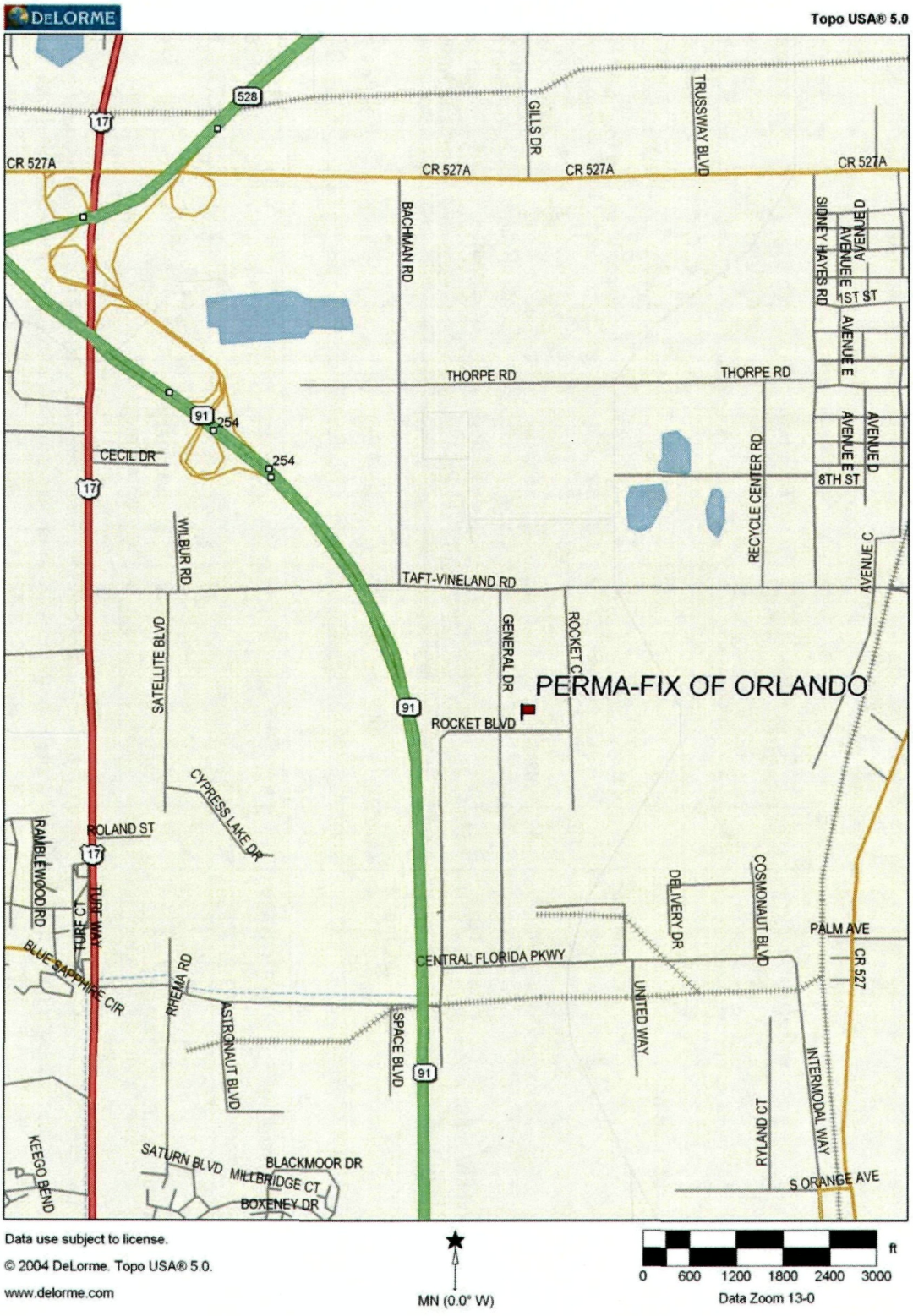


Figure 1 – Facility Location Map

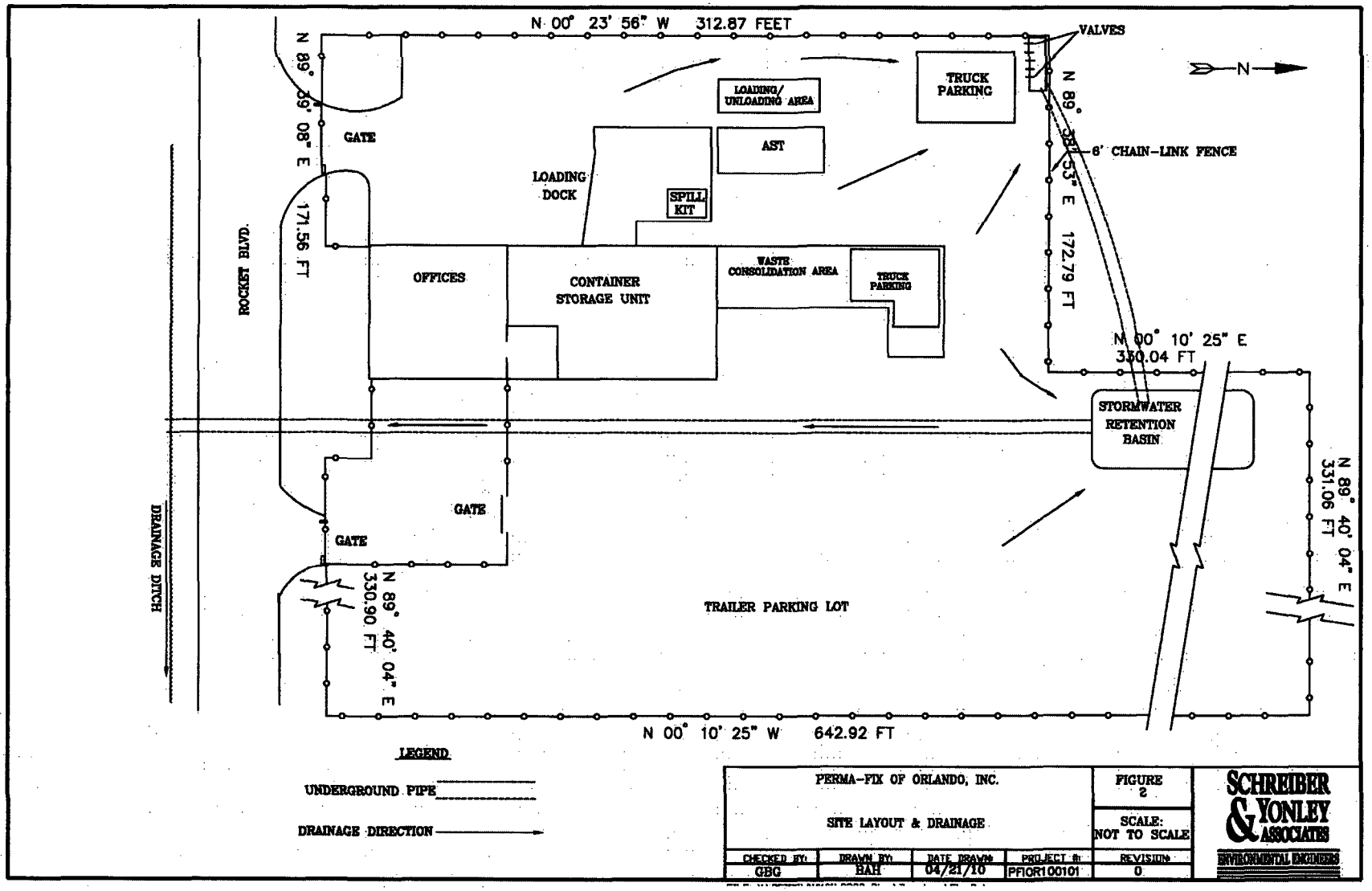


Figure 2 – Site Layout and Drainage

SECTION 3

FACILITY CONFORMANCE

Section 112.4 requires certain notifications be made if a facility has a discharge of more than 1,000 gallons of oil in a single discharge or more than 42 gallons of oil in each of two discharges. This section also requires a facility amend the Plan if the Regional Administrator requests amendments to the Plan.

When appropriate, this facility will make required notification within 60 days, and will either amend the Plan when requested by the Regional Administrator or will appeal. A copy of this notification will also be sent to the appropriate state agency in charge of the oil pollution control activities (i.e., Florida Department of Environmental Protection).

Section 112.5(a) requires the amendment of the SPCC Plan when there is a change to the facility design, construction, operation, or maintenance that materially affects its potential for discharge. This includes adding, moving and decommissioning of containers (including tanks) piping and secondary containment. This also includes a change in product or service or the revision of a standard operating or maintenance procedure.

This requirement is discussed in Section 5, SPCC Plan Updates.

Section 112.5 (b) requires a review and evaluation of the SPCC Plan at least once every five years. The completion of the review must be documented and a statement as to whether the Plan will be amended.

The five-year review is discussed in Section 5. The signed statement for this review is provided in the Plan's cover documents. If the SPCC Plan needs to be amended based on this review, the SPCC Plan will be amended within 6 months of the review. Any amendment will be implemented as soon as possible, but not later than 6 months following the Plan amendment.

Section 112.5(e) requires a Professional Engineer certify any Technical Amendments to this Plan.

Any Technical Amendments to this Plan will be certified by a Professional Engineer.

Section 112.6: This regulation provides an option to prepare and self-certify the SPCC Plan for qualified facilities meeting criteria specified in Section 112.3(g).

This facility does not qualify for the self-certification option.

Section 112.7(a)(1) requires a discussion of the facility's conformance with SPCC Plan requirements.

The Plan developed herein shall conform to the regulatory format provided by the regulation. Full approval of management is included in the Plan's cover documents.

Section 112.7(a)(2) requires a description of non-conforming issues, the reasons for non-conformance and the measures to achieve equivalent environment protection adopted by the facility.

Any issues of non-conformance, or the achievement of equivalent environmental protection, are described in the discussion provided in response to the specific requirement.

Section 112.7(a)(3) requires a physical description of the facility, including site diagrams showing container storage locations and contents, transfer stations, piping, and buried tanks;

This information is provided in Section 2 of this Plan, with specific reference to Figures 1 and 2. There are no buried petroleum storage tanks at this facility.

i) **Information defining the types and capacities of oil storage;**

This information is provided by Table 1 in Section 2 of this Plan.

ii) **Discharge prevention measures including procedures for routine handling of products;**

The procedures for bulk fuel transfer and container handling are provided in Appendix A in a format that may be copied and laminated for posting and reference in product-handling areas.

iii) **A description of secondary containment around containers and storage areas;**

Table 1 in Section 2 of this Plan provides this information.

iv) **Countermeasures for the discovery, response, and cleanup of a discharge;**

These procedures are provided by Section 4 of this Plan.

v) **Methods of disposal of recovered materials; and**

Methods for disposal of recovered material are considered in Section 4.

vi) **A contact list and phone numbers for appropriate individuals and agencies to be notified in the event of a spill.**

This contact list is provided in Appendix B and may be copied and laminated for posting in key areas.

Section 112.7(a)(4) Unless facility has submitted a response plan under 112.20, provide information and procedures to enable person to accurately report a discharge.

Appendix C provides a form that addresses each required data subject. Facility personnel are trained in completing the form and communicating to the relevant agencies. Use of this form is discussed in Section 4 of this Plan.

Section 112.7(a)(5) requires Plan organization that describes procedures to be used when a discharge occurs in a way that makes them readily usable in an emergency, and include appropriate supporting material as appendices..

This Plan is organized in the above manner.

Section 112.7(b) requires a prediction of spill flow direction, rates of flow, and quantities that could be discharged.

Details regarding potential spills of petroleum products from this facility, with respect to each source, location, type of failure, quantity, spill rate, direction, and type of containment, are provided in Table 2 and the drainage sketch, Figure 2.

Based upon natural and engineered drainage and containment provisions, the probability of a spill or release of product beyond containment structures is considered to be low. In the unlikely event of a major release of material and failure of the secondary containments, it appears that a product spill would flow to the stormwater retention basin at the northern portion of the facility, then into the overfill discharge pipe and south through an underground pipe to a drainage ditch on the south side of Rocket Blvd. and then to the east to Boggy Creek.

Section 112.7(c) requires provision of containment system and/or diversionary structures or equipment capable of containing a spill and must be constructed so that any discharge from a primary containment system will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following or its equivalent: dikes, berms, retaining walls, curbing, drip pans, sumps and collection systems, culverting, gutters, weirs, booms, other barriers, spill diversion ponds, retention ponds, or sorbent materials.

This facility provides secondary containment as described by Table 1.

Section 112.7(d) requires a clear explanation if you determine that installation of certain specified structures or equipment is not practicable. For bulk containers, conduct both

periodic integrity testing of the containers, conduct periodic integrity and leak testing of valves and piping, development of an oil spill contingency plan in cooperation with local authorities, and a written commitment of adequate response resources if structural secondary containment can not be provided.

The facility has not determined that any of the specified requirements are impracticable so this requirement is not applicable.

Section 112.7(e) requires written procedures and records for periodic inspection and tests of the storage areas and containers.

Appendix D provides an inspection procedure and inspection form for conducting inspections aimed at preventing and detecting spill threats. Records of inspections are kept on file for a minimum of three years.

Section 112.7(f)(1), (2), and (3) require training of oil-handling personnel at least annually and designation of a person at the facility accountable for discharge prevention.

The Company Environmental Coordinator, Facility Manager or his/her designee must instruct personnel in the proper operation and maintenance of equipment to prevent petroleum spills. Initial training and annual briefings are provided.

The following summarizes the training program:

Initial training: The initial training sessions will include a review of the SPCC Plan. Oil-handling personnel will be trained in the appropriate responses to spills, in the proper loading and transfer of liquids, in the operation and maintenance of equipment to prevent the discharge of liquids, discharge procedure protocols, general facility operations, and in applicable pollution control laws, rules, and requirements. The training will also include the use of the Spill Response Record Form from Appendix C and notification procedures.

Annual Briefings: Annual briefings are held to assure that appropriate oil-handling personnel are familiar with the SPCC Plan. Past spill events (if applicable) and failures are described, malfunctioning components are discussed, and recently developed or changed precautionary measures are addressed. A sample training record form has been provided in Appendix E.

Initial and Annual Training Issues: Appropriate oil-handling personnel have been instructed in the following spill prevention and countermeasure requirements.

- No tanks, drums, or compartments are to be filled without first checking levels.

- No bulk product deliveries are to be conducted unattended.
- Documented inspections of containers (drums, totes and tanks) used for oil storage or transfer are to be conducted monthly on any appropriate form.
- Accumulated precipitation shall be inspected for the presence of an oil sheen prior to opening valves and draining containment area. Inspection must be documented on form in Appendix F.
- Containers are to be checked daily for any signs of leaks, deterioration, or vandalism. Visual daily checks of piping, valves, pumps, and hoses are to be made for signs of leaks.
- No phase of material transferring or processing shall be conducted unattended by personnel.

Personnel are trained in:

- The location of emergency response materials;
- Containment procedures;
- Fire and explosion response;
- Shutdown of liquid handling equipment; and
- Spill notification procedures.

Section 112.7(g) requires a description of measures to secure and control access to the oil handling, processing, and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; and provisions for adequate lighting to prevent acts of vandalism and assist in the discovery of oil discharges.

The facility is surrounded by an eight foot tall steel security fence topped with 3 strands of barbed wire. The two entrance gates are locked when the facility is unattended.

The pump starter control is not currently locked, but the facility is locked when unattended. A lock box will be installed on the pump switch within 6 months of finalizing this plan. The tank does not have a drain valve and is filled and emptied by pumping from the top of the tank.

The facility has adequate lighting located near the petroleum storage areas. The lighting is such that it would assist in the discovery of spills at night and assist in the prevention of acts of vandalism.

Section 112.7(h)(1) requires use of quick drainage systems when drainage from loading/unloading racks does not flow into catchment basin or treatment system.

This requirement is not applicable because the facility does not utilize loading racks.

Section 112.7(h)(2) requires measures to prevent vehicles from departing loading/unloading racks before complete disconnection of transfer lines.

This requirement is not applicable because the facility does not utilize loading racks. However, the bulk fuel transfer procedure in Appendix A provides that all drivers must assure disconnection of transfer lines before departing the loading/unloading area.

Section 112.7(h)(3) requires inspection of the lower-most drain and all outlets prior to filling and departure of any tank truck from loading/unloading racks to prevent spillage on site or during transit from the site.

This requirement is not applicable because the facility does not utilize loading racks. However, the bulk fuel transfer procedure in Appendix A provides that all drivers must check the lower-most drain and outlets to be sure they are free of leaks prior to filling and departure of any truck. Any sign of leakage is immediately corrected to prevent spills while in transit.

Section 112.7(i) requires evaluation of a field-constructed aboveground container for risk of failure due to brittle fracture upon repair, alteration, reconstruction, or change of service.

The tank was shop-built to the UL-142 and UL-2085 design standards. The risk of brittle failure will be evaluated if the tank undergoes repair, alteration, reconstruction, or a change in service that might affect the risk of discharge or failure.

Section 112.7(j) requires discussion of more stringent State rules.

The State of Florida rules regarding oil spill reporting are discussed in Section 4.

Section 112.7(k) provides alternative requirements to general secondary containment requirements of Section 112.7(c) for qualified oil-filled operational equipment.

This facility has not adopted these alternative requirements.

Section 112.8(a) requires compliance with Sections 112.7 and 112.8 provisions.

As previously addressed, compliance with Section 112.7 provisions has been established. Compliance with 112.8 requirements is addressed below.

Section 112.8(b)(1) requires control of drainage from diked storage areas by valves or manually activated pumps or ejectors. The condition of the accumulation must be inspected before discharge to ensure no discharge of oil.

The northwest area of the facility is provided with manual open/close valves. Accumulations of storm water are checked for oil presence prior to drainage per the procedure provided by Appendix F. A record of such drainage is recorded on the form in Appendix F.

Section 112.8(b)(2) limits valve use to manual, open-and-closed design valves for the drainage of diked areas. Flapper-type drain valves are not allowed.

No flapper-type drain valves are used.

Section 112.8(b)(3) requires design of facility drainage systems for undiked areas subject to discharge to flow into ponds, lagoons, or catchment basins. Catchment basins may not be located in areas subject to periodic flooding.

Undiked areas of this facility are not considered subject to discharges of stored oil or oil being transferred or processed.

Section 112.8(b)(4) requires that a diversion system be provided if Section 112.8(b)(3) cannot be met.

This section is not applicable to the facility.

Section 112.8(b)(5) requires fail-safe design for systems requiring pumped transfer within treatment systems for drainage waters.

This section is not applicable to the facility.

Section 112.8(c)(1) requires the use of containers that are constructed of materials that are compatible with the contents stored and conditions of storage.

All of the aboveground storage tanks and containers used at the facility are constructed of materials that are compatible with petroleum storage. The liquids stored in the tanks are stored at ambient temperature and at atmospheric pressure.

Section 112.8(c)(2) requires provision of secondary containment for bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) for the capacity of the largest container to be stored plus precipitation freeboard.

Secondary containment is provided as described in Table 1

Section 112.8(c)(3) requires all dike water discharges to be controlled by: keeping bypass valve closed, inspecting retained rainwater prior to discharge, open and reseal the valve under responsible management, and keep records of such events.

Appendix F provides a procedure and form for recording these events.

Section 112.8(c)(4)&(c)(5) require protection of buried and partially buried metallic storage tanks from corrosion by coatings or cathodic protection backed by periodic leak testing.

There are no underground tanks used for the storage of oil at this facility.

Section 112.8(c)(6) requires facilities to test or inspect each aboveground container for integrity on a regular schedule and whenever material repairs are made. Determination must be made in accordance with industry standards regarding the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections considering container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph

The aboveground storage tank at the facility is visually inspected daily (on days of terminal operation) by operating personnel for signs of deterioration, leaks, or the accumulation of liquids inside the containment areas. Inspection records are kept on site for a minimum of three (3) years. The visual inspection procedure and a sample inspection log are supplied in Appendix D.

Tank No. 1 (containing compartments 1A and 1B) is a double-walled tank. It is equipped with a gauge to measure accumulated moisture in the interstitial space between the tank walls and a valve used to drain and examine any accumulated moisture, if present. Checking this gauge and inspecting accumulated moisture for oil is a part of every inspection. This extra inspection becomes the regular integrity test for Tank No. 1 required by Section 112.8(c)(6).

The tanker and vacuum trucks are pressure-tested at least annually in accordance with Federal Motor Carrier Safety Administration (FMCSA) regulations in 49 CFR 180.407.

Section 112.8(c)(7) requires monitoring for oil contamination of internal heating coil discharges to open watercourses or the provision of predischarge storage or treatment.

This section is not applicable to the facility because no internal heating coil systems are present or in use in petroleum storage tanks.

Section 112.8(c)(8) requires engineering of containers to provide for high level alarms, high liquid level pump cutoff, or manning direct level reading devices. Regular testing of liquid level sensing devices is required.

The used oil storage tank has a direct reading gauge and an overfill alarm for each compartment of the tank.

Section 112.8(c)(9) requires observation of effluent treatment facilities frequently enough to detect possible system upsets that could cause a harmful discharge.

There are no plant effluents other than storm water discharged at this facility.

Section 112.8(c)(10) requires prompt correction of visible discharges that result in a loss of oil from the container, including, but not limited to, seams, gaskets, piping, pumps, valves, rivets, and bolts.

Visible oil leaks that result in a loss of oil from tank seams, gaskets, rivets, or bolts will be investigated and repaired as soon as possible.

Section 112.8(c)(11) requires positioning or locating mobile or portable storage containers to prevent a harmful discharge. Also, requires secondary containment (except for mobile refuelers and non-transportation-related tank trucks) sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

The three oil trucks (one tank truck and two vacuum trucks) are essentially empty when parked in the outside truck parking area. (This area has approximately 2,600 gallons of secondary containment but no available freeboard for precipitation.) On occasion, trucks may return to the facility late in the day and are parked overnight before transferring oil to the storage tank. The facility has two inside parking spaces with secondary containment under roof (so freeboard for precipitation is not required.)

Section 112.8(d)(1) requires cathodic protection and protective wrapping and coating of piping installed or replaced on or after 8/16/02. Inspection for corrosion of buried piping exposed for any reason is required. Corrosion damage must be repaired.

The facility uses no underground piping for petroleum materials.

Section 112.8(d)(2) requires capping or blank flanging the terminal connection at the transfer point and mark it as to origin when not in service or is in standby service for an extended time.

Transfer points at the terminal connection are capped or blank-flanged and transfer piping is marked as to its origin when not in service.

Section 112.8(d)(3) requires proper design of piping supports to minimize abrasion and corrosion and allow for expansion and contraction.

The piping supports at this facility are designed in this manner.

Section 112.8(d)(4) requires regular inspection of all above ground valves, piping, and appurtenances; and conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.

As described by the response to Section 112.7(e), the oil storage areas are inspected per Appendix D. The inspections are documented and maintained on file for a period of at least three years. In addition, facility personnel regularly check such items during daily use.

Section 112.8(d)(5) requires that vehicles entering the facility should be warned to ensure that the vehicle will not endanger overhead piping or other oil transfer operations.

There is no aboveground oil transfer piping across traffic ways at the facility.

Section 112.20(a) requires the owner or operator of a facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging oil into navigable waters to submit a facility response plan to the Regional Administrator. Section 112.(f)(1) and Attachment C-1 provide criteria to determine if the facility "could reasonably be expected to cause substantial harm."

The "Certification of Substantial Harm Determination Form" in Appendix G demonstrates that a Facility Response Plan is not required for this facility.

SECTION 4

SPILL RESPONSE PROCEDURES

Response to spills is conducted according to the procedures detailed in the following subsections. It must be noted that, if several personnel respond to an incident, many of the following procedures can be conducted concurrently. For example, while one person is following the emergency notification procedures, other personnel could be implementing actions to contain the spill.

I. Spill Notification Procedure

Upon the discovery of a spill, the following notifications must be made.

1. The Facility Manager (Primary Emergency Coordinator) must be notified immediately. If he/she cannot be located, then one of the Alternate Emergency Coordinators or the Company Environmental Coordinator in Gainesville should be called. (See Attachment B for phone numbers.) The person who discovers the spill should be prepared to give the following information:

   - his/her name and position with the company;
   - material spilled and estimated amount;
   - source and cause of the spill, if known;
   - area affected;
   - time the spill was first observed; and
   - actions initially taken.

2. The Facility Manager, First Alternate Emergency Coordinator and the Company Environmental Coordinator are the only persons authorized to make agency notifications. If the facility has released petroleum materials off site in harmful quantities as defined in 40 CFR 110.3 (i.e., it has caused a sheen or discoloration on any water body), an authorized person shall report the incident to the National Response Center (NRC) immediately. In reporting, the Company Environmental Coordinator shall be prepared to give the following information:

   - his/her name and position with the company;
   - facility name, location, and phone number;
   - material spilled and amount;
   - source and cause of the spill, if known (do not speculate);
   - area affected;
   - time the spill was first observed;
   - extent of injuries, if any;
   - any evacuation precautions taken;
   - response actions conducted, including containment and cleanup underway;
   - estimated time to complete remediation;

- potential hazards to human health or the environment; and
- names of other individuals and organizations contacted.

3. For a release greater than 42 gallons into the environment (i.e., soil, water), the authorized person shall determine if the emergency response contractor should be contacted for cleanup assistance.

4. If the facility has discharged oil into or onto the navigable waters of the United States in any of the following quantities:
   - more than 1,000 gallons in a single spill event, or
   - more than 42 gallons in each of two spill events within a 12-month period,

   the company must submit a written report as described in subsection IV of this Section.

5. Florida has specific reporting requirements.
   a) A discharge of any amount of a pollutant (this includes oil) that enters, or threatens to enter, waters of the state must be reported as soon as possible, but no later than one hour after the discovery of the occurrence to the NRC and the FL State Warning Point phone number in Appendix B.
   b) A discharge of 25 gallons of oil or more to a "pervious" surface must be reported as soon as possible, but no later than 24 hours.

II. Response Preparation

Appropriate containment/spill response equipment is kept on site including:

- materials suitable for absorbing petroleum products (e.g., sand, kitty litter, corn cobs, oil-dry, absorbent socks or pads);
- chemical-resistant gloves, Tyvek® or rubber aprons, safety glasses or goggles, and/or other appropriate personal protective equipment;
- sandbags;
- fire extinguishers;
- shovels; squeegees, and brooms, pipe wrench, drum plug wrench;
- empty 85-gallon overpack drum: and
- empty 55-gallon drums with lids and closure rings.

III. Response Procedure

Upon detection of a spill, personnel responding will immediately:

- put on proper personal protective equipment, which, at a minimum, includes chemical-resistant gloves;
- identify the source and cause of the spill;
- take appropriate measures to stop the flow of material (e.g., reconnect hose, plug hole, shut valve, transfer liquid to an empty drum, etc.);
- quickly estimate the magnitude of the spill;

- using absorbent material, sandbags, or similar material, block drainage ways, if there is a potential for material to flow off the property;
- contain any material, using cleanup and containment equipment, that may have escaped the storage vessel;
- recover and containerize spilled material (as much as possible) into a drum or container and dispose of properly to a landfill permitted for such material, to a recycler capable of processing off-specification oil, or to a recycler permitted for disposal;
- decommission the tank (if the spill was from a tank) and schedule it for repair after the cause of the spill or failure has been determined; and
- obtain assistance from a spill cleanup contractor if it is determined that a spill is uncontrollable and/or contamination outside the facility has occurred.

After the spill has been contained and cleaned up, the Facility Manager (or designee) must ensure that all spill response equipment is restocked and ready for usage.

IV. Written Agency Notification

If the facility has released petroleum materials off site in harmful quantities, which means it has caused a sheen or discoloration on any navigable waters of the United States, the Company Environmental Coordinator should report the incident to the National Response Center using one of the forms provided in Appendix C.

If the facility has discharged oil into or on the navigable waters of the United States in any of the following quantities:

- more than 1,000 gallons in a single spill event, or
- more than 42 gallons in each of two spill events within a 12-month period,

The Company Environmental Coordinator (or designee) must submit a written report to the Regional Administrator of the Environmental Protection Agency, Region IV within 60 days. The report shall contain the information provided by the form in Appendix C.

Florida has specific reporting requirements. These include:

a) A discharge of any amount of a pollutant (this includes oil) that enters, or threatens to enter, waters of the state, and

b) A discharge of 25 gallons or more of oil to a "pervious" surface.

The written report must be submitted on FL Discharge Report Form 62-761.900(1), which is provided in Appendix C. A copy of any report sent to the Regional Administrator must also be submitted to the Florida Department of Environmental Protection.

SECTION 5

SPCC PLAN UPDATES

Section 112.5(a) requires the amendment of the SPCC Plan when there is a change to the facility design, construction, operation, or maintenance that materially affects its potential for discharge. This includes adding, moving and decommissioning of containers (including tanks) piping and secondary containment. This also includes a change in product or service or the revision of a standard operating or maintenance procedure. Section 112.5(b) requires a review and evaluation of the SPCC Plan at least once every five years. The completion of the review must be documented.

The SPCC Plan shall be updated:

- within six months after significant changes occur in the facility operations;
- if the Plan fails to provide the desired degree of protection;
- when a period of five (5) years has elapsed since the last revision(s) and the review indicates that a revision is necessary; or
- as required by changes in the 40 CFR 112 regulations.

APPENDIX A

BULK FUEL TRANSFER AND CONTAINER HANDLING PROCEDURES

Bulk Fuel Transfer Procedure

1. Smoking is prohibited while offloading petroleum or fueling vehicles.

2. Verify that all valves in the secondary containment berm are closed. Move the truck into the unloading area, stop the engine, (unless required to operate a pump), set the hand brake, place wheel chocks, and connect a grounding cable between the tank and the truck frame. Verify sufficient volume in tank (if unloading truck) or in the truck (if loading truck) prior to starting transfer.

3. Drivers must be present during all petroleum transfers. No petroleum will be transferred to or from a storage tank unattended. The driver must be awake, have an unobstructed view of the tank and be within 25 feet of the truck. All transfer operations must be shut down if the driver leaves area.

4. All employees and all drivers must have knowledge of the nature of the materials they are handling and must have been trained on the procedures to be followed in an emergency.

5. Hose connections, valves, and pumps must be visually inspected continually during transfers to check for leaks or drips. All leaks must be stopped immediately or contained in a drip pan.

6. All areas, including loading/unloading area, truck parking area, etc. are to be kept free of petroleum materials and excessive residue.

7. To minimize the release of any material during transfer operations, drip pans or buckets should be used under all hose connections. Drip pans and buckets must be cleaned up before leaving the area. Oil dry, rags, shovels, etc. are available at the facility for cleanup in the event of a spill or drip.

8. The available capacity in the storage tank must be checked and confirmed before material is transferred from a truck to the tank to ensure the storage tank is not overfilled.

9. All spills must be reported to the facility manager.

10. Drivers have the responsibility to keep the transfer area clean and free of petroleum materials, to prevent spills from occurring, to immediately and thoroughly cleanup any material spilled, and to report spills to the facility operator.

11. After unloading or unloading is finished, disconnect and secure all hoses, disconnect the grounding cable, assure that the vehicle's lowermost drain and outlets are closed and secured, and assure that tank valves and other closures are closed and free of leaks before removing the wheel chocks and driving the truck from the transfer area.

Container Handling Procedure

1. Company policy prohibits smoking in petroleum product container storage areas.

2. All containerized materials must be secured prior to moving.

3. During loading and unloading containers from a truck, the truck should be moved into the unloading area with the engine stopped and hand brake set.

4. Personnel using or handling containers must be aware of the materials they are handling and must be trained in the procedures to follow in an emergency, such as rupture or puncture of the container.

5. All containers must be labeled as to content.

6. All areas, including concrete containment and storage rooms or trailers, are to be kept free of spilled material.

7. All spills must be reported to the facility manager.

APPENDIX B

EMERGENCY NOTIFICATION LIST

EMERGENCY NOTIFICATION LIST

FACILITY MANAGER/PRIMARY EMERGENCY COORDINATOR: Cory Howard 424 Manhattan Dr. Orlando, FL 32839	407-963-2697 (cell)
FIRST ALTERNATE EMERGENCY COORDINATOR: John MacDonald 760 Oak Lane Orange City, FL 32763	407-697-3232 (cell)
SECOND ALTERNATE EMERGENCY COORDINATOR: Rob Boal 581 Tyler Ave Deltona, Fl 32725	407-690-8656 (cell)
PERMA-FIX OFF-SITE ENVIRONMENTAL CONTACT Kurt Fogleman, Gainesville, FL	352-222-8032 (cell)
Orange County Sheriff:	911
Orange County Emergency Management Fire Department and ambulance:	911 or 407-836-9140
Orange Regional Medical Center:	407-841-5111
Florida Department of Environmental Protection's 24-hr State Warning Point	850-413-9911 or 800-320-0519
NATIONAL RESPONSE CENTER:	800-424-8802
Orange County Environmental Protection	407-836-1400
Florida Department of Environmental Protection, Central District	407-894-7555
RESPONSE/CLEANUP CONTRACTORS	
Eagle SWS Emergency Response	800-852-8878
Clean Harbors of Florida, LLC	800-645-8265

APPENDIX C

FLORIDA DISCHARGE REPORTING FORM 62-761.900(1)
SPILL RESPONSE NOTIFICATION FORM

SPILL RESPONSE NOTIFICATION FORM

Reporter's Full Name: _____
Position: _____
Phone Numbers: Day _____
Evening _____
Company: Perma-Fix of Orlando, Inc.
Address: 10100 Rocket Blvd.
City, State, Zip: Orlando, FL 32824

Facility Longitude: 81.386487 West Facility Latitude: 28.417870 North

INCIDENT DESCRIPTION

Incident Address/Location: _____
Container Type: _____
Date and Time of Discharge: _____ _____AM/PM
Material Discharged: _____
Discharged Quantity: _____ Gallons
Did Material Reach Water? _____ (Y/N) If so, What Quantity? _____ Gallons
Media Affected? Air? Y or N Water? Y or N Land? Y or N
Description of Medium Affected: _____
_____
Source and/or Cause of Incident: _____
_____
_____
_____
_____
_____

RESPONSE ACTION AND IMPACTS

Actions Taken to Correct, Control, or Mitigate Incident: _____
_____
_____
_____
_____
_____

Number of Injuries: _____ Number of Deaths: _____
Evacuation Required? _____ (Y/N) Number Evacuated: _____
Damage Incurred: _____ (Y/N) Damage Cost Estimate: $_____

NOTIFICATIONS

USEPA? ____ (Y/N) STATE? ____ (Y/N) Other? _____

ADDITIONAL INFORMATION: _____
_____
_____
_____

Discharge Reporting Form

PLEASE PRINT OR TYPE

DEP Form # 62-761.900(1)
Form Title Discharge Reporting Form
Effective Date _____

Instructions are on the reverse side. Please complete all applicable blanks

1. Facility ID Number (if registered):_____ **2. Date of form completion**:_____

3. General information
Facility name:_____
Facility Owner or Operator: _____
Facility Contact Person_____Telephone number: ( )_____County: _____
Faciility Mailing address: _____
Location of discharge (facility street address):_____
Latitude and Longitude of discharge (If known.)_____

4. Date of receipt of test results or discovery of confirmed discharge: _____month/day/year

5. Estimated number of gallons discharged:_____

6. Discharge affected: [ ] Air [ ] Soil [ ] Ground water [ ] Drinking water well(s) [ ] Shoreline [ ] Surface water (water body name) _____

7. Method of discovery (check all that apply)

[ ] Liquid detector (automatic or manual)	[ ] Internal inspection	[ ] Closure/Closure Assessment
[ ] Vapor detector (automatic or manual)	[ ] Inventory control	[ ] Groundwater analytical samples
[ ] *Tightness test*	[ ] *Monitoring wells*	[ ] Soil analytical tests or samples
[ ] Pressure test	[ ] Automatic tank gauging	[ ] Visual observation
[ ] Statistical Inventory Reconciliation	[ ] Manual tank gauging	[ ] Other _____

8. Type of regulated substance discharged: (check one)

[ ] Unknown	[ ] Used/waste oil	[ ] Jet fuel	[ ] Heating oil	[ ] New/lube oil
[ ] Gasoline	[ ] Aviation gas	[ ] Diesel	[ ] Kerosine	[ ] Mineral acid

[ ] Hazardous substance - includes CERCLA substances from USTs above reportable quantities, pesticides, ammonia, chlorine, and derivatives (write in name or Chemical Abstract Service (CAS) number)_____
[ ] Other_____

9. Discharge originated from a: (check all that apply)

[ ] Dispensing system	[ ] Pipe	[ ] Barge	[ ] Pipeline	[ ] Vehicle
[ ] Tank	[ ] Fitting	[ ] Tanker ship	[ ] Railroad tankcar	[ ] Airplane
[ ] Unknown	[ ] Valve failure	[ ] Other Vessel	[ ] Tank truck	[ ] Drum

[ ] Other_____

10. Cause of the discharge: (check all that apply)

[ ] Loose connection	[ ] Puncture	[ ] Spill	[ ] Collision	[ ] Corrosion
[ ] Fire/explosion	[ ] Overfill	[ ] Human error	[ ] Vehicle Accident	[ ] Installation failure

[ ] Other_____

11. Actions taken in response to the discharge: _____

12. Comments: _____

13. Agencies notified (as applicable):

[ ] State Warning Point	[ ] National Response Center	[ ] Fire Department	[ ] County Tanks Program	[ ] DEP (district/person)
(904) 488-1320	***1-800-424-8802***	_____	_____	_____

14. *To the best of my knowledge and belief all information submitted on this form is true, accurate, and complete.*

_____ _____
Printed Name of Owner, Operator or Authorized Representative Signature of Owner, Operator or Authorized Representative.

APPENDIX D

FACILITY INSPECTION PROCEDURE AND FORM

INSPECTION PROCEDURE FOR SPCC PLAN

An optional inspection form is provided in this appendix. However, as long as equivalent inspections are conducted and documented per the RCRA permit, this inspection form need not be used. The following items, if present, must be inspected by trained personnel:

OBSERVE for puddles of product or an oil sheen on any standing water.

ABOVEGROUND PIPING: Liquid bulk fill lines will be inspected for leaks, evidence of leaks, and evidence of potential leaks.

TANKS and PARKED TRUCKS: All bulk storage containers and associated piping will be visually inspected for leaks, overflows, and signs of potential problems. Special emphasis will be placed on the inspection of seams, patches, piping connections, sight glasses, and other openings. Valves should be in their proper position and locked or sealed, if required.

SECONDARY CONTAINMENT: Secondary containment areas will be inspected for adequate capacity and leaks, cracks, or other signs of failure.

SECONDARY CONTAINMENT RAINWATER ACCUMULATION: Diked areas must be kept reasonably free of rainwater accumulation. Secondary containment drains MUST be closed and sealed when not in use. The drain must be manned whenever it is open. Any drainage of rainwater from secondary containment areas must be INSPECTED and RECORDED on a Secondary Containment Drainage Log (See Appendix F).

TRANSFER PUMPS: Transfer pumps will be inspected for leaks around the housing. Associated piping will be inspected for leaks at the pump connections.

DRUMS: Drums will be inspected when received for condition. Drums will not be accepted if there is evidence of leaks or mishandling. Drums in storage will be examined for leaks, with special attention given to the bottom seam.

DRAINS: Drains should be inspected for blockage and accumulation of debris that would impede the free flow of liquids.

DRAIN PANS OR DRIP CONTAINERS: The liquid level in drip pans or drain containers should be checked and emptied as needed.

TANK OVERFILL ALARMS: Overfill alarm systems should be tested periodically for proper function.

DISPENSING HOSES: Dispensing hoses should be inspected for leaks and hose deterioration.

SPILL RESPONSE EQUIPMENT: Check spill response equipment to make sure that it is fully stocked and in good condition. Replace or upgrade as needed.

SPCC MONTHLY FACILITY INSPECTION FORM

Oil Storage Description	Tank/Truck/ Container in Good Condition?	Tank Piping, Hoses, Valves, Supports, Appurtenances, etc. in Good Condition?	Secondary Containment in Good Condition, No Liquid?	Date Problem Corrected and Employee Initials
Used Oil Tank				
Tank Truck				
Vacuum Truck No. 1				
Vacuum Truck No. 2				
Used Oil Drums in HW Storage Area		NA		

Spill Response Equipment: Seal in Place or Inventory Complete?	Y	N

Comments: _____

_____

_____

To the best of my knowledge, I have personally verified that the information on this report is true, accurate, and complete.

Inspector's Signature: _____ Date: _____

OPTIONAL INSPECTION

Antifreeze is not controlled by the SPCC Regulations. However, the condition of the totes and secondary containment may be inspected. Condition acceptable: Y N

APPENDIX E

TRAINING RECORD

TRAINING RECORD

TOPIC: Spill Prevention, Control, and Countermeasure Plan

DATE: _____ TRAINER: _____
(Signature)

Summary of Training Topics:

During this training session, the company SPCC Plan was reviewed. The spill prevention and containment procedures to be used, the appropriate emergency procedures to be followed in the event of a spill, and the emergency response equipment available to control and clean up a spill were discussed.

The briefing may include a discussion of known releases, lessons learned, equipment failures and close calls. Personnel will have an opportunity to share recommendations regarding spill prevention and clean-up.

Print Name	Signature	Location

APPENDIX F

SECONDARY CONTAINMENT DRAINAGE PROCEDURE AND LOG

SECONDARY CONTAINMENT DRAINAGE PROCEDURE

1. Inspect secondary containment on a monthly basis or as necessary for drainage.

2. Any time water accumulated within secondary containment is drained; the Secondary Containment Drainage Log must be completed and filed.

3. Visually inspect the secondary containment. Indicate the condition of the accumulated water.

4. Record the depth of accumulation.

5. Follow the appropriate drainage procedure.

   A. Observe the water surface for a sheen or oil presence.

   B. If the water is possibly contaminated, take a sample for closer observation and possible testing.

   C. If the water is considered contaminated, call the facility operator to direct cleanup or further action.

   D. If in doubt of the appropriate action, contact a facility operator immediately.

6. Enter the time that the drainage operation begins. If any tanks within the secondary containment contain product, frequent checking of the discharge must be done.

7. Upon completion of the operation, secure all valves and/or pumps.

8. Enter stop time.

9. Sign, date, and file the form. Drainage Logs are to be retained at the facility for a minimum period of three (3) years.

SECONDARY CONTAINMENT DRAINAGE LOG

Inspection Date	Condition	Depth Of Accum.	Procedure	Valve Opened	Valve Closed	Comments
				Time	Time	
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			
	1 2 3		1 2 3			

Condition:
1. Accumulation clear & free of oil, sheen, or discoloration.
2. Accumulation has very small quantity of oil, film, sheen, or discoloration.
3. Accumulation has heavy oil content.

Procedure:
1. Drained with no treatment required.
2. Residual oil removed by means of absorbent material, and clear water drained.
3. Entire accumulation pumped to drum or tank truck for disposal.

NOTE: If in doubt on procedure or condition, contact facility operator immediately

The water was drained under my supervision: ______________________ __________

Signature Date

APPENDIX G

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

FACILITY NAME: Perma-Fix of Orlando, Inc.

FACILITY ADDRESS: 10100 Rocket Blvd. Orlando, FL 32824

1. Does the facility have a maximum storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfer of oil to or from vessels?

   Yes ___X___ No _____

2. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank and precipitation within the storage area?

   Yes _____ No ___X___

3. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the facility could cause injury to fish, wildlife, and sensitive environments?

   Yes ___X___ No _____

4. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the facility would shut down a public drinking water intake?

   Yes ___X___ No _____

5. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and, within the past 5 years, has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?

   Yes _____ No ___X___

*If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

CERTIFICATION – INCLUDES ALL SUBSTATIONS

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

_____	Facility Manager
Signature	Title
Corey Howard	_____
Name (please type or print)	Date

Updated Job Descriptions with Training Requirements

Perma-Fix of Orlando
Employee Job Description

Form 6

POSITION TITLE: (Title) **Operations Manager (PFO)**

REPORTS TO: (Title) **General Manager**

Manager Signature	Employee Signature	Date

FUNCTION:

Exempt - The Operations Manager will perform a variety of responsibilities to support the successful methods of operation in the facility. The Operations Manager will also provide field service support with the customer.

DUTIES:

- Manage and dispatch drivers and operators for drum and field service projects.
- Supervise customer service activities and account manager; interact with customers to ensure all customer requirements are properly identified and priced correctly.
- Perform compliance review of all generic inbound profiles and prepare outbound profiles to final disposal facilities.
- Manage 10-day hazardous waste transfer, oil and warehouse operations.
- Ensure that all field and facility activities are in compliance with all applicable regulations.
- Help Identify and develop additional field service and labpack business.
- Supervise maintenance of the facility and rolling stock including all recordkeeping.
- Perform other duties as assigned.

QUALIFICATIONS:

- Requires a Bachelor's degree in a science/related area or at least 10 years of related work experience.
- Detailed understanding of RCRA, DOT, and the Used Oil regulations.
- Minimum Class B CDL is required.
- Familiar with a variety of the field's concepts, practices, and procedures.
- A certain degree of creativity and latitude is required.

WORKING CONDITIONS:

Requires frequent exposure to sometimes unpleasant odors. May require exposure to outside elements where subjected to seasonal extremes. May require the use of a particulate mask, an air-purifying respirator, Tyvek or other protective clothing. Frequent bending, standing and sitting for long periods of time may be required.

RCRA CLASSIFICATION: Plant Personnel / Environmental Personnel

PLANT PERSONNEL
Safety Measures and Protective Equipment –
Regulations:
-- 29 CFR 1910.120 – HAZWOPER
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply
Permit Application:
-- Procedures, Structures, and Equipment Used to Prevent Hazards [II.A.4.c]
-- Preparedness and Prevention [II.A.4.d]
Operation Documents: Procedures developed for operations and processes

Potential Hazards Posed by Materials and Operations –
Regulations:
-- 49 CFR Part 177 – Hazardous materials segregation and separation
Permit Application:
-- Contingency Plan and Emergency Procedures [II.A.4.b]; sub-section 5.0
-- Description of operations for storage and treatment [II.B and C]

Compliance with Environmental, Transportation, and Occupational Regulations –
Regulations:
-- 40 CFR Part 261 – Identification and listing of hazardous waste
-- 40 CFR Part 263 – Requirements for transfer facilities
-- 40 CFR Part 24 – Requirements for hazardous waste permitted facilities
-- 49 CFR Part 172 – Hazardous materials description and labeling
-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply
Permit Application:
-- Description of operations for storage and treatment [II.B and C]

Emergency Response –
Regulations:
-- 29 CFR 1910.120 – Section VII of Exhibit II.A.4.e.-1
Permit Application:
-- Contingency Plan and Emergency Procedures [II.A.4.b]

Proper Performance on Job Assignments –
Permit Application:
-- Description of operations for storage and treatment [II.A and B]
Operation Documents: Procedures developed for operation and processes

This training will be accomplished through the following:

- 24 hours initial RCRA/HAZWOPER training
- 4 hours initial DOT training
- 8 hours annual refresher training (RCRA/HAZWOPER/DOT)

ENVIRONMENTAL PERSONNEL
Safety Measures and Protective Equipment –
Regulations:
-- 40 CFR Part 264 – Prevention; ignitables, reactives, and incompatibles
-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR 1910.120 – HAZWOPER
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply
Permit Application:
-- Procedures, Structures, and Equipment Used to Prevent Hazards [II.A.4.c]
-- Preparedness and Prevention [II.A.4.d]
-- Contingency Plan and Emergency Procedures [II.A.4.b]; sub-section 5.0
-- Description of operations for storage and treatment [II.B and C]

Compliance with Environmental, Transportation and Occupational Regulations –
Regulations:
-- 40 CFR Part 261 – Identification and listing of hazardous waste
-- 40 CFR Part 262 – Requirements for generators of hazardous waste
-- 40 CFR Part 263 – Requirements for transfer facilities
-- 40 CFR Part 264 – Requirements for hazardous waste permitted facilities
-- 40 CFR Part 268 – Requirements for land disposal
-- 49 CFR Part 172 – Hazardous materials description and labeling
-- 49 CFR Part 173 – Hazardous materials classification and packaging
-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply
Permit Application: Permit conditions and permit application

Emergency Response –
Regulations:
-- 29 CFR 1910.120 – Section VII of Exhibit II.A.4.e.-1
Permit Application:
-- Contingency Plan and Emergency Procedures [II.A.4.b]

This training will be accomplished through the following:

- 24 hours initial RCRA/HAZWOPER training
- 4 hours initial DOT training
- 8 hours annual refresher training (RCRA/HAZWOPER/DOT)
- Additional professional development training as necessary to keep informed of new and changing regulations.

POSITION TITLE: (Title) **PFO Customer Service Manager (CSM)**

REPORTS TO: (Title) **Orlando GM, Gainesville GM**

Manager Signature(s)	Employee Signature	Date

FUNCTION:

Non-Exempt. This position is responsible for managing customer service activities to support external and internal customers for Perma-Fix's Industrial facilities, provide support to Sales personnel and Perma-Fix of Orlando Operational personnel for receipt and shipping of waste, and provide coordination and oversight of Perma-Fix of Orlando facility customer service activities.

DUTIES:

- Perform activities associated with receipt of shipments into the facilities:
  - Facility determinations
  - Profile completion or modification for acceptance
  - Obtain profile approvals and conveying approvals to customer
- Provide waste tracking information (status of customer shipments) to customers, as needed.
- Work directly with customers in support of sales personnel to ensure that customer needs are met; serve as backup contact for customer.
- Oversee facility customer service representatives to obtain needed information, waste status, CDs, etc.
- Supply information needed to support invoicing (e.g. CDs, treatment reports).
- Provide support for sales personnel as needed to investigate new waste stream treatment paths.
- Ensure that contract requirements are communicated to treatment facilities and are adhered to for conformance.
- Provide contract required reports (i.e., weekly or monthly) to customers.
- Manage problem resolution process for non-conforming wastes.
- Work closely with sales personnel and contract manager to resolve out of scope or non-conformance issues.
- Perform other duties as assigned.

QUALIFICATIONS:

- One year of facility specific or nuclear industry experience
- Strong organizational skills and ability to handle multiple priorities/projects
- Advanced knowledge of Microsoft Programs (Excel, Word, PowerPoint, etc.)
- Good verbal communication skills
- Ability to work overtime as needed
- Ability to work as a team member
- Ability to travel minimally
- People-oriented individual with professional manner
- Able to work with minimal supervision

WORKING CONDITIONS:

Primarily office environment, sitting 6-7 hours per day, climbing stairs, and bending necessary. Some exposure to plant environment where hot and cold, dust, noise, and radiation exposure is present.

RCRA CLASSIFICATION: Administration Personnel

ADMINISTRATION PERSONNEL

Compliance with Environmental, Transportation, and Occupational Regulations – Regulations:

-- 40 CFR 261; for personnel involved in the waste evaluation
-- 40 CFR 262; for personnel involved in processing outbound shipments
-- 40 CFR 263; for personnel involved in processing waste in transfer
-- 40 CFR 264: for personnel involved in processing inbound shipments
-- 40 CFR 268; for personnel involved in processing waste shipments
-- 49 CFR 172; for personnel involved in waste shipments and evaluation

Permit Application:

-- Waste Analysis Plan [III.A.5 & 6]; for personnel involved in waste evaluation
-- Manifest and Recordkeeping [II.A.7]; for personnel in shipping and evaluation

This training will be accomplished through the following:

- 8 hours initial RCRA training
- 4 hours initial DOT training
- 4 hours annual refresher training (RCRA and DOT)

POSITION TITLE: (Title) **Driver / Technician (DT)**

REPORTS TO: (Title) **Transportation Supervisor**

Manager Signature	Employee Signature: Jesus Rivas	Date

FUNCTION:

Non-Exempt. This position is responsible for performing transportation and technician duties for the Perma-Fix Of Florida (PFF) facility.

DUTIES:

- Drive truck to assigned locations. (These locations and the scope of work at each location will vary on a daily basis.)
- Inspect containers/drums (cargo) for loose fittings, deformity, and/or signs of leaking before loading onto truck, and ensure all containers are properly labeled and manifested..
- Load multiple containers (usually 55-gallon drums) of hazardous and non-hazardous waste onto the truck for transportation and delivery to other subsequent destinations.
- Maintain the equipment in a clean and orderly status at all times.
- Operate all equipment in a safe and effective manner.
- Unload, load, and process containers from trucks, as needed, to the final destination.
- Ensure that all assigned tasks are performed in compliance with the Department of Transportation, facility permit, company policies, and state and federal regulations.
- Perform other duties as assigned.

QUALIFICATIONS:

- High school graduation certificate, GED, or diploma from higher education, DOMV / CDL
- Maintain a clean driving record.
- Maintain current operator license, Class A/B CDL with HAZMAT endorsement.
- Maintain current HAZWOPER and other applicable training.
- Accurately prepare manifests, labels, daily logs, and trip reports.
- Ability to periodically climb into, onto and out of equipment of all types.
- Able to discern various distinctions of sound to determine if equipment is laboring excessively or is damaged.
- Good eyesight and depth perception, and mental ability to comprehend, analyze, and communicate both verbal and written.
- Able to handle items ranging in weight from 400 – 600 pounds (drums, totes, boxes) with a drum cart or dolly.
- Display good customer relations at all times.

WORKING CONDITIONS:

Occasional exposure to vibration and excessive noise. Frequent exposure to the outside elements where subject to seasonal extremes of temperature. Use of a particulate mask, an air-purifying respirator, tyvek, or other protective equipment, as needed.

RCRA CLASSIFICATION: Plant Personnel

PLANT PERSONNEL
Safety Measures and Protective Equipment –
Regulations:
-- 29 CFR 1910.120 – HAZWOPER
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply
Permit Application:
-- Procedures, Structures, and Equipment Used to Prevent Hazards [II.A.4.c]
-- Preparedness and Prevention [II.A.4.d]
Operation Documents: Procedures developed for operations and processes

Potential Hazards Posed by Materials and Operations –
Regulations:
-- 49 CFR Part 177 – Hazardous materials segregation and separation
Permit Application:
-- Contingency Plan and Emergency Procedures [II.A.4.b]; sub-section 5.0
-- Description of operations for storage and treatment [II.B and C]

Compliance with Environmental, Transportation, and Occupational Regulations –
Regulations:
-- 40 CFR Part 261 – Identification and listing of hazardous waste
-- 40 CFR Part 263 – Requirements for transfer facilities
-- 40 CFR Part 24 – Requirements for hazardous waste permitted facilities
-- 49 CFR Part 172 – Hazardous materials description and labeling
-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply
Permit Application:
-- Description of operations for storage and treatment [II.B and C]

Emergency Response –
Regulations:
-- 29 CFR 1910.120 – Section VII of Exhibit II.A.4.e.-1
Permit Application:
-- Contingency Plan and Emergency Procedures [II.A.4.b]

Proper Performance on Job Assignments –
Permit Application:
-- Description of operations for storage and treatment [II.A and B]
Operation Documents: Procedures developed for operation and processes

This training will be accomplished through the following:

- 24 hours initial RCRA/HAZWOPER training
- 4 hours initial DOT training
- 8 hours annual refresher training (RCRA/HAZWOPER/DOT)

POSITION TITLE: (Title) **Regional Sales**

REPORTS TO: (Title) **General Manager**

Manager Signature | Employee Signature | Date

FUNCTION:

Exempt - This position supports marketing and sales for the Gainesville facility and requires that the employee go out into the business community and generate new clients or potential customers' future shipments of hazardous and non-hazardous waste, into the Perma-Fix of Florida facility.

DUTIES:

- Make routine visits to customers to ensure they are in compliance with local, state and federal laws for storage and shipment of hazardous and non-hazardous waste
- Schedule equipment and manpower for site clean-up projects and petroleum pre-approval site projects.
- Screening waste for shipment.
- Preparing profiles.
- Site inspection.
- Review DEP site inspection.
- Coordinating transportation of waste.
- Ensure correct storage and labeling of hazardous and non-hazardous waste.
- On-site inspection of all hazardous and non-hazardous records.
- Container and drum inspection.
- Coordinate spill clean-up.
- Coordinate/schedule 40-hour training for clients.
- Perform other duties as assigned.

QUALIFICATIONS:

- Experience in donning and wearing protective gear when projects require the use of protective equipment
- 40-hour hazardous/non-hazardous training.
- Knowledge of all local, state and federal laws pertaining to hazardous and non-hazardous waste.

RCRA CLASSIFICATION: Administration Personnel

ADMINISTRATION PERSONNEL

Compliance with Environmental, Transportation, and Occupational Regulations – Regulations:

-- 40 CFR 261; for personnel involved in the waste evaluation
-- 40 CFR 262; for personnel involved in processing outbound shipments
-- 40 CFR 263; for personnel involved in processing waste in transfer
-- 40 CFR 264: for personnel involved in processing inbound shipments
-- 40 CFR 268; for personnel involved in processing waste shipments
-- 49 CFR 172; for personnel involved in waste shipments and evaluation

Permit Application:

-- Waste Analysis Plan [III.A.5 & 6]; for personnel involved in waste evaluation
-- Manifest and Recordkeeping [II.A.7]; for personnel in shipping and evaluation

This training will be accomplished through the following:

- 8 hours initial RCRA training
- 4 hours initial DOT training
- 4 hours annual refresher training (RCRA and DOT)