CROSS/TESSITORE & ASSOCIATES, P.A.
4759 S. CONWAY ROAD, SUITE D
ORLANDO, FLORIDA 32812
305/851-1484

2 copies to Satish K
& Application
done 4-14-

April 11, 1986

Ms. Laxsamee Levin
FDER-St. Johns River District
3319 Maguire Blvd.
Suite 232
Orlando, Florida 32803

Subject: Operation Permit Application

Dear Ms. Levin:

As per our recent conference, C/TA is submitting, on behalf of Chemical Conservation Corporation, an operating permit application for their Hazardous Waste Transfer Facility at Regency Industrial Park.

Included are:

* Four (4) copies of the permit application
* Check in the amount of $500.
* One (1) copy of the form requesting releases from Solid Waste Management Units
* List of chemicals handled, as you requested at our meeting (included in permit application)

Any questions or comments regarding this permit application are to be directed to our office.

Best regards.

Sincerely,

Frank Cross/mm

Frank L. Cross, Jr., P.E.
President

FLC:kbw
cc: Mr. Rhondal Chambers

OPERATING PERMIT APPLICATION

FOR HAZARDOUS WASTE FACILITY PERMIT

CHEMICAL CONSERVATION CORPORATION

APRIL 9, 1986

PAID
500
APR 14 1986

SAINT JOHNS
RIVER DISTRICT

APR 1986
RECEIVED
St. Johns River
District

APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT
PART I - GENERAL
TO BE COMPLETED BY ALL APPLICANTS

Please Type or Print

A. GENERAL INFORMATION

1. TYPE OF FACILITY:

DISPOSAL [ ] LANDFILL [ ]	LAND TREATMENT [ ]	SURFACE IMPOUNDMENT [ ]					
STORAGE [X] CONTAINERS [X]	TANKS [ ]	PILES [ ]	SURFACE IMPOUNDMENT [ ]				
TREATMENT [ ] TANKS [ ]	PILES [ ]	INCINERATION [ ]	SURFACE IMPOUNDMENT [ ]				
THERMAL [ ]	CHEMICAL [ ]	PHYSICAL [ ]	BIOLOGICAL [ ]				

2. TYPE OF APPLICATION: [ ] TOP [ ] CONSTRUCTION [X] OPERATION [ ] CLOSURE

3. DATE CURRENT OPERATION BEGAN (OR IS EXPECTED TO BEGIN): January, 1985

4. FACILITY NAME: Chemical Conservation Corporation

5. EPA/DER I.D. NO.: FLD 980559728

6. FACILITY LOCATION OR STREET ADDRESS: 653 Rocket Boulevard, Orlando, FL 32824

7. FACILITY MAILING ADDRESS: 653 Rocket Boulevard, Orlando, FL 32824
STREET OR P.O. BOX CITY STATE ZIP

8. CONTACT PERSON: Rondal G. Chambers TELEPHONE: (305) 859-4441
TITLE: vice President
MAILING ADDRESS: 653 Rocket Boulevard, Orlando, FL 32824
STREET OR P.O. BOX CITY STATE ZIP

9. OPERATOR'S NAME: Chemical Conservation Corp. TELEPHONE: (305) 859-4441

10. OPERATOR'S ADDRESS: 653 Rocket Boulevard, Orlando, FL 32824
STREET OR P.O. BOX CITY STATE ZIP

11. FACILITY OWNER'S NAME: Thomas P. Sullivan TELEPHONE: (313) 282-9250

12. FACILITY OWNER'S ADDRESS: 18550 Allen Road, Wyandotte, MI 48192
STREET OR P.O. BOX CITY STATE ZIP

13. LEGAL STRUCTURE: [X] CORPORATION [ ] NON-PROFIT CORPORATION [ ] PARTNERSHIP
[ ] INDIVIDUAL [ ] LOCAL GOVERNMENT [ ] STATE GOVERNMENT [ ] FEDERAL GOVERNMENT
[ ] OTHER

14. IF AN INDIVIDUAL, PARTNERSHIP, OR BUSINESS IS PERFORMED UNDER AN ASSUMED NAME, SPECIFY COUNTY AND STATE WHERE NAME IS REGISTERED. COUNTY: Orange STATE FL

15. IF A CORPORATION, INDICATE STATE OF INCORPORATION Florida .

16. IF AN INDIVIDUAL OR PARTNERSHIP, LIST OWNERS:

NAME: Thomas P. Sullivan

ADDRESS: 18550 Allen Road, Wyandotte, MI 48192
STREET OR P.O. BOX CITY STATE ZIP

NAME:

ADDRESS:
STREET OR P.O. BOX CITY STATE ZIP

NAME:

ADDRESS:
STREET OR P.O. BOX CITY STATE ZIP

NAME:

ADDRESS:
STREET OR P.O. BOX CITY STATE ZIP

17. SITE OWNERSHIP STATUS: [X] OWNED [ ] TO BE PURCHASED [ ] TO BE LEASED ____ YEARS
[ ] PRESENTLY LEASED: EXPIRATION DATE _____ IF LEASED, GIVE:
LAND OWNER'S NAME _____
LAND OWNER'S ADDRESS _____
STREET OR P.O. BOX CITY STATE ZIP

18. ENGINEER: Frank L. Cross, Jr. REGISTRATION NO.: 7916
ADDRESS: 4759 S. Conway Rd., Suite D, Orlando, FL 32812
STREET OR P.O. BOX CITY STATE ZIP
ASSOCIATED WITH: Cross/Tessitore & Associates, P.A.

19. FACILITY LOCATED ON INDIAN LAND: [ ] YES [X] NO

20. EXISTING OR PENDING ENVIRONMENTAL PERMITS:

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
NONE				

B. SITE INFORMATION (See Attachment 1)

1. FACILITY LOCATION: COUNTY: Orange NEAREST COMMUNITY: Taft
LATITUDE: 28° 25' 04" N LONGITUDE 081° 23' 10" W

2. AREA OF FACILITY SITE (ACRES): 1.2

3. ATTACH TOPOGRAPHIC MAPS WHICH SHOW ALL THE FEATURES INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.

4. IS THE SITE LOCATED IN A 100-YEAR FLOOD PLAIN? [X] YES [ ] NO
ATTACH ALL INFORMATION INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.

C. LAND USE INFORMATION (See Attachment 2)

1. PRESENT ZONING OF THE SITE? Industrial

2. IF A ZONING CHANGE IS NEEDED, WHAT SHOULD NEW ZONING BE? N/A

3. PRESENT LAND USE OF SITE Industrial

D. OPERATING INFORMATION (See Attachment 3)

1. IS WASTE GENERATED ON SITE? [ ] YES [X] NO LIST THE SIC CODES (4-DIGIT)

2. ATTACH A DESCRIPTION OF THE OPERATION INCLUDING (a) A BRIEF DESCRIPTION OF THE NATURE OF THE BUSINESS; (b) A SPECIFICATION OF THE HAZARDOUS WASTE LISTED OR DESIGNATED IN 40 CFR PART 261 TO BE TREATED, STORED, OR DISPOSED AT THE FACILITY; (c) AN ESTIMATE OF THE ANNUAL QUANTITY OF SUCH WASTE; AND (d) PROCESSES USED FOR TREATING, STORING, OR DISPOSING OF HAZARDOUS WASTE AND THE DESIGN CAPACITY OF THOSE PROCESSES.

*3. ATTACH A COPY OF THE REPORTS OF THE CHEMICAL AND PHYSICAL ANALYSES OF THE HAZARDOUS WASTES HANDLED AT THE FACILITY, INCLUDING ALL INFORMATION WHICH MUST BE KNOWN TO TREAT, STORE, OR DISPOSE OF THE WASTES IN ACCORDANCE WITH §264.13(a).

*4. ATTACH A COPY OF THE WASTE ANALYSIS PLAN REQUIRED BY §264.13.

5. ATTACH A SCALE DRAWING OF THE FACILITY SHOWING THE LOCATION OF ALL PAST, PRESENT, AND FUTURE TSD AREAS. ALSO SHOW THE TRAFFIC PATTERN INCLUDING ESTIMATED VOLUME AND CONTROL.

*6. ATTACH A COPY OF THE PROCEDURES USED TO COMPLY WITH §264.12 AND 40 CFR PART 264, SUBPART E (MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING).

E. FACILITY SECURITY INFORMATION (See Attachment 4)

*1. ATTACH A DESCRIPTION OF THE SECURITY PROCEDURES AND EQUIPMENT REQUIRED BY §264.14.

*2. ATTACH A COPY OF THE CONTINGENCY PLAN REQUIRED BY 40 CFR PART 264, SUBPART D.

3. ATTACH A DESCRIPTION OF PROCEDURES, STRUCTURES, OR EQUIPMENT USED AT THE FACILITY TO:

   a. MITIGATE EFFECTS OF EQUIPMENT FAILURE AND POWER OUTAGES;

   b. PREVENT HAZARDS IN UNLOADING OPERATIONS (i.e., RAMPS, SPECIAL FORKLIFTS);

   c. PREVENT UNDUE EXPOSURE OF PERSONNEL TO HAZARDOUS WASTE (i.e., PROTECTIVE CLOTHING);

   d. PREVENT CONTAMINATION OF WATER SUPPLIES;

e. PREVENT RUN-OFF FROM HAZARDOUS WASTE HANDLING AREAS TO OTHER AREAS OF THE FACILITY OR ENVIRONMENT, OR TO PREVENT FLOODING (i.e., BERMS, DIKES, TRENCHES);

*f. PREVENT ACCIDENTAL IGNITION OR REACTION OF IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES.

*4. ATTACH A DESCRIPTION OF THE PREPAREDNESS AND PREVENTION PROCEDURES REQUIRED BY 40 CFR PART 264, SUBPART C, INCLUDING DESIGN AND OPERATION OF THE FACILITY, REQUIRED EQUIPMENT, TESTING AND MAINTENANCE OF EQUIPMENT, ACCESS TO COMMUNICATIONS OR ALARM SYSTEM, REQUIRED AISLE SPACE, AND ARRANGEMENTS WITH LOCAL AUTHORITIES.

*5. ATTACH AN OUTLINE OF BOTH THE INTRODUCTORY AND CONTINUING TRAINING PROGRAMS USED TO PREPARE PERSONS TO OPERATE OR MAINTAIN THE HWM FACILITY IN A SAFE MANNER AS REQUIRED TO DEMONSTRATE COMPLIANCE WITH §264.16.

F. FINANCIAL RESPONSIBILITY INFORMATION (See Attachment 5)

1. ATTACH THE MOST RECENT CLOSURE COST ESTIMATES FOR THE FACILITY, PREPARED IN ACCORDANCE WITH §264.142*, PLUS A COPY OF THE FINANCIAL ASSURANCE MECHANISM ADOPTED IN COMPLIANCE WITH §264.143.

2. WHERE APPLICABLE, ATTACH THE MOST RECENT POST-CLOSURE COST ESTIMATE FOR THE FACILITY, PREPARED IN ACCORDANCE WITH §264.144, PLUS A COPY OF THE FINANCIAL ASSURANCE MECHANISM ADOPTED IN COMPLIANCE WITH §264.145, OR §264.146 IF APPROPRIATE.

3. WHERE APPLICABLE, ATTACH A COPY OF THE INSURANCE POLICY OR OTHER DOCUMENTATION WHICH COMPRISES COMPLIANCE WITH THE REQUIREMENTS OF §264.147. FOR A NEW FACILITY, DOCUMENTATION SHOWING THE AMOUNT OF INSURANCE MEETING THE SPECIFICATION OF §264.147(a) AND, IF APPLICABLE, §264.147(b), THAT THE OWNER OR OPERATOR PLANS TO HAVE IN EFFECT BEFORE INITIAL RECEIPT OF HAZARDOUS WASTE FOR TREATMENT, STORAGE, OR DISPOSAL. A REQUEST FOR A VARIANCE IN THE AMOUNT OF REQUIRED COVERAGE, FOR A NEW OR EXISTING FACILITY, MAY BE SUBMITTED AS SPECIFIED IN §264.147(c).

*THIS STANDARD IS SUBSTANTIALLY IDENTICAL TO THE CORRESPONDING 40 CFR PART 265 STANDARD.

PART II - CONTAINERS

A. 40 CFR PART 265 (See Attachment 6)

ALL PART 265 REQUIREMENTS ARE SUBSTANTIALLY IDENTICAL TO THOSE IN PART 264. APPLICANTS MUST COMPLY WITH THE REQUIREMENTS IN NUMBERS 2, 3, 4, 5, AND 6 IN SECTION B BELOW.

B. 40 CFR PART 264

1. ATTACH THE REQUIREMENTS OF EITHER (a) OR (b):

   (a) DEMONSTRATE COMPLIANCE WITH §264.175(c) BY ATTACHING:

   (1) TEST PROCEDURES AND RESULTS OR OTHER DOCUMENTATION OR INFORMATION TO SHOW THAT THE WASTES DO NOT CONTAIN FREE LIQUIDS; AND
   (2) A DESCRIPTION OF HOW THE STORAGE AREA IS DESIGNED OR OPERATED TO DRAIN AND REMOVE LIQUIDS OR HOW CONTAINERS ARE KEPT FROM CONTACT WITH STANDING LIQUIDS.

   (b) DESCRIBE THE CONTAINMENT SYSTEM TO SHOW COMPLIANCE WITH §264.175(b) BY ATTACHING:

   (1) BASIC DESIGN PARAMETERS, DIMENSIONS, AND MATERIALS OF CONSTRUCTION.
   (2) HOW THE DESIGN PROMOTES DRAINAGE OR HOW CONTAINERS ARE KEPT FROM CONTACT WITH STANDING LIQUIDS IN THE CONTAINMENT SYSTEM.
   (3) CAPACITY OF THE CONTAINMENT SYSTEM RELATIVE TO THE NUMBER AND VOLUME OF CONTAINERS TO BE STORED.
   (4) PROVISIONS FOR PREVENTING OR MANAGING RUN-ON.
   (5) HOW ACCUMULATED LIQUIDS CAN BE ANALYZED AND REMOVED TO PREVENT OVERFLOW.

*2. ATTACH SKETCHES, DRAWINGS, OR DATA DEMONSTRATING COMPLIANCE WITH §264.176 (SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES) AND §264.177(c) (SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES) WHERE APPLICABLE.

*3. WHERE INCOMPATIBLE WASTES ARE STORED OR OTHERWISE MANAGED IN CONTAINERS, ATTACH A DESCRIPTION OF THE PROCEDURES USED TO ENSURE COMPLIANCE WITH §§264.177(a) AND (b) (SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE) AND §264.17 (GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE).

*4. ATTACH A DESCRIPTION OF THE PROCEDURES USED TO COMPLY WITH §264.171 (CONDITION OF CONTAINERS), §264.172 (COMPATIBILITY OF WASTE WITH CONTAINERS), AND §264.173 (MANAGEMENT OF CONTAINERS).

*5. ATTACH A COPY OF THE INSPECTION PROCEDURES AS REQUIRED IN §264.174 (INSPECTIONS) AND §264.15 (GENERAL INSPECTION REQUIREMENTS).

6. ATTACH A COPY OF THE CLOSURE PLAN AS REQUIRED BY §§264.112* and 264.178.

*THIS STANDARD IS SUBSTANTIALLY IDENTICAL TO THE CORRESPONDING 40 CFR PART 265 STANDARD.

PART III - TANKS N/A

A. 40 CFR PART 265

1. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.192 INCLUDING:

    a. THE COMPATIBILITY OF WASTES OR REAGENTS WITH THE TANK OR ITS LINER.

    b. FOR UNCOVERED TANKS, DESCRIPTION OF THE FREEBOARD, CONTAINMENT STRUCTURE, DRAINAGE CONTROL, OR DIVERSION CONTROL SYSTEM.

    c. FOR TANKS WITH A CONTINUOUS FEED, A DESCRIPTION OF THE FEED CUT-OFF OR BY-PASS SYSTEM.

2. FOR TANKS USED TO TREAT OR STORE A DIFFERENT WASTE OR TREAT THE SAME WASTES BY DIFFERENT PROCESSES, ATTACH EITHER A WASTE ANALYSIS AND TRIAL TREATMENT OR STORAGE TESTS, OR ATTACH DOCUMENTED INFORMATION ON SIMILAR STORAGE OR TREATMENT, AS REQUIRED IN §265.193.

B. 40 CFR PART 264

1. ATTACH A DESCRIPTION OF DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH THE REQUIREMENTS OF §§264.191, 264.192, 264.198, 264.199 AND 264.17 INCLUDING:

    a. REFERENCES TO DESIGN STANDARDS OR OTHER AVAILABLE INFORMATION USED (OR TO BE USED) IN DESIGN AND CONSTRUCTION OF THE TANK.

    b. A DESCRIPTION OF DESIGN SPECIFICATIONS INCLUDING IDENTIFICATION OF CONSTRUCTION MATERIALS AND LINING MATERIALS (INCLUDE PERTINENT CHARACTERISTICS SUCH AS CORROSION OR EROSION RESISTANCE).

    c. TANK DIMENSIONS, CAPACITY, AND SHELL THICKNESS.

    d. A DIAGRAM OF PIPING, INSTRUMENTATION, AND PROCESS FLOW.

    e. DESCRIPTION OF FEED SYSTEMS, SAFETY CUT-OFF, BY-PASS SYSTEMS, AND PRESSURE CONTROLS (e.g., VENTS).

    *f. DESCRIPTION OF PROCEDURES FOR HANDLING INCOMPATIBLE IGNITABLE, OR REACTIVE WASTES, INCLUDING THE USE OF BUFFER ZONES.

2. ATTACH INSPECTION PROCEDURES INCLUDING:

    *a. THE DAILY AND WEEKLY INSPECTION OF THE EQUIPMENT OR OPERATIONS AS REQUIRED IN §264.194(a).

    b. THE INSPECTION SCHEDULE AND PROCEDURES REQUIRED IN §264.194(b) AND (c).

    *c. THE INSPECTION REQUIREMENTS IN §264.15.

3. ATTACH A COPY OF THE CLOSURE PLAN AS REQUIRED BY §§264.112 AND 264.197.

*THIS STANDARD IS SUBSTANTIALLY IDENTICAL TO THE CORRESPONDING 40 CFR PART 265 STANDARD.

PART IV - SURFACE IMPOUNDMENTS N/A

A. 40 CFR PART 265

1. ATTACH A STATEMENT OF THE MINIMUM FREEBOARD TO BE MAINTAINED AT THE FACILITY, AND THE BASIS OF THE DESIGN TO DEMONSTRATE COMPLIANCE WITH FREEBOARD REQUIREMENTS OF §265.222.

2. ATTACH A BASIS OF DESIGN AND DESIGN ANALYSIS OF ANY DIKES TO COMPLY WITH §265.223.

3. FOR SURFACE IMPOUNDMENTS USED TO TREAT OR STORE A DIFFERENT WASTE OR TREAT THE SAME WASTES BY DIFFERENT PROCESSES, ATTACH EITHER A WASTE ANALYSIS AND TRIAL TREATMENT OR STORAGE TESTS, OR ATTACH DOCUMENTED INFORMATION ON SIMILAR STORAGE OR TREATMENT, AS REQUIRED IN §265.225.

4. ATTACH INSPECTION PROCEDURES REQUIRED IN §265.226 INCLUDING:

    a. DAILY INSPECTION OF THE FREEBOARD LEVEL.

    b. WEEKLY INSPECTION OF THE DIKES AND VEGETATION SURROUNDING THE DIKE.

5. ATTACH A COPY OF THE CLOSURE AND POST-CLOSURE PLAN AS REQUIRED IN §§265.228, 265.112, AND 265.118.

6. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH PART 265, SUBPART F (GROUND WATER MONITORING), INCLUDING:

    a. A GROUND WATER MONITORING SYSTEM AS REQUIRED IN §265.91;

    b. A GROUND WATER SAMPLING AND ANALYSIS PLAN AS REQUIRED IN §265.92;

    c. AN OUTLINE OF A GROUND WATER QUALITY ASSESSMENT PROGRAM AS REQUIRED IN §265.93(a);

    d. THE PREPARATION, EVALUATION, AND RESPONSE REQUIREMENTS OF §265.93(b)-(f); AND

    e. THE RECORD KEEPING AND REPORTING REQUIREMENTS OF §265.94.

7. IF APPLICABLE, ATTACH A COPY OF THE NOTICE THAT HAS BEEN PLACED IN THE DEED OR OTHER INSTRUMENT REQUIRED BY §265.120.

B. 40 CFR PART 264

1. ATTACH A LIST OF THE HAZARDOUS WASTES PLACED OR TO BE PLACED IN EACH SURFACE IMPOUNDMENT.

2. ATTACH DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING HOW THE SURFACE IMPOUNDMENT IS OR WILL BE DESIGNED, CONSTRUCTED, OPERATED, AND MAINTAINED TO MEET THE REQUIREMENTS OF §264.221. THIS SUBMISSION MUST ADDRESS THE FOLLOWING ITEMS AS SPECIFIED IN §264.221:

    a. THE LINER SYSTEM (EXCEPT FOR AN EXISTING PORTION OF A SURFACE IMPOUNDMENT). IF AN EXEMPTION FROM THE REQUIREMENT FOR A LINER IS SOUGHT AS PROVIDED BY §264.221(b), SUBMIT DETAILED PLANS AND ENGINEERING AND HYDROGEOLOGIC REPORTS AS APPROPRIATE, DESCRIBING ALTERNATE DESIGN AND OPERATING PRACTICES

THAT WILL, IN CONJUNCTION WITH LOCATION ASPECTS, PREVENT THE MIGRATION OF ANY HAZARDOUS CONSTITUENTS INTO THE GROUND WATER OR SURFACE WATER AT ANY FUTURE TIME:

b. PREVENTION OF OVERTOPPING; AND

c. STRUCTURAL INTEGRITY OF DIKES.

3. IF AN EXEMPTION FROM SUBPART F OF PART 264 IS SOUGHT, AS PROVIDED BY §264.222(a), ATTACH DETAILED PLANS AND AN ENGINEERING REPORT EXPLAINING THE LOCATION OF THE SATURATED ZONE IN RELATION TO THE SURFACE IMPOUNDMENT, AND THE DESIGN OF A DOUBLE-LINER SYSTEM THAT INCORPORATES A LEAK DETECTION SYSTEM BETWEEN THE LINERS.

4. ATTACH A DESCRIPTION OF HOW EACH SURFACE IMPOUNDMENT, INCLUDING THE LINER AND COVER SYSTEMS AND APPURTENANCES FOR CONTROL OF OVERTOPPING, WILL BE INSPECTED IN ORDER TO MEET THE REQUIREMENTS OF §264.226(a) AND (b). THIS INFORMATION SHOULD INCLUDE THE INSPECTION PLAN REQUIRED UNDER §264.15*.

5. ATTACH A CERTIFICATION BY A QUALIFIED ENGINEER WHICH ATTESTS TO THE STRUCTURAL INTEGRITY OF EACH DIKE, AS REQUIRED UNDER §264.226(c). FOR NEW UNITS, THE OWNER OR OPERATOR MUST SUBMIT A STATEMENT BY A QUALIFIED ENGINEER THAT HE WILL PROVIDE SUCH A CERTIFICATION UPON COMPLETION OF CONSTRUCTION IN ACCORDANCE WITH THE PLANS AND SPECIFICATIONS.

6. ATTACH A DESCRIPTION OF THE PROCEDURE TO BE USED FOR REMOVING A SURFACE IMPOUNDMENT FROM SERVICE, AS REQUIRED UNDER §264.227(b) AND (c).

7. ATTACH A DESCRIPTION OF HOW HAZARDOUS WASTE RESIDUES AND CONTAMINATED MATERIALS WILL BE REMOVED FROM THE UNIT AT CLOSURE, AS REQUIRED UNDER §264.228(a)(1). FOR ANY WASTES NOT TO BE REMOVED FROM THE UNIT UPON CLOSURE, THE OWNER OR OPERATOR MUST SUBMIT DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING HOW §264.228(a)(2) AND (b) WILL BE COMPLIED WITH. THIS INFORMATION SHOULD INCLUDE THE CLOSURE PLAN AND, WHERE APPLICABLE, THE POST-CLOSURE PLAN REQUIRED UNDER §264.112* AND 264.118*.

8. IF IGNITABLE OR REACTIVE WASTES ARE TO BE PLACED IN A SURFACE IMPOUNDMENT, ATTACH AN EXPLANATION OF HOW §§264.229 AND 264.17* WILL BE COMPLIED WITH.

9. IF INCOMPATIBLE WASTES, OR INCOMPATIBLE WASTES AND MATERIALS WILL BE PLACED IN A SURFACE IMPOUNDMENT, ATTACH AN EXPLANATION OF HOW §§264.230 AND 264.17* WILL BE COMPLIED WITH.

10. ATTACH A COPY OF THE NOTICE THAT HAS BEEN PLACED IN THE DEED OR OTHER INSTRUMENT REQUIRED BY §264.120.

*THIS STANDARD IS SUBSTANTIALLY IDENTICAL TO THE CORRESPONDING 40 CFR PART 265 STANDARD.

PART V - WASTE PILES N/A

A. 40 CFR PART 265

1. ATTACH A DESCRIPTION OF THE WIND DISPERSAL CONTROL SYSTEM WHICH DEMONSTRATES COMPLIANCE WITH §265.251.

2. ATTACH A WASTE ANALYSIS PLAN AS REQUIRED IN §265.252 WHICH INCLUDES AN ANALYSIS OF A REPRESENTATIVE SAMPLE OF WASTE FROM EACH INCOMING MOVEMENT BEFORE ADDING THE WASTE TO ANY EXISTING PILE, UNLESS (1) THE ONLY WASTES THE FACILITY RECEIVES WHICH ARE AMENABLE TO PILING ARE COMPATIBLE WITH EACH OTHER; OR (2) THE WASTE RECEIVED IS COMPATIBLE WITH THE WASTE IN THE PILE TO WHICH IT IS TO BE ADDED.

3. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.253 (CONTAINMENT OF LEACHATE OR RUN-OFF AND PRECIPITATION OR RUN-ON).

4. ATTACH A COPY OF THE CLOSURE AND POST-CLOSURE PLAN AS REQUIRED IN §§265.258, 265.112, AND 265.118.

5. IF APPLICABLE, ATTACH A COPY OF THE NOTICE THAT HAS BEEN PLACED IN THE DEED OR OTHER INSTRUMENT REQUIRED BY §265.120.

B. 40 CFR PART 264

1. ATTACH A LIST OF HAZARDOUS WASTES PLACED OR TO BE PLACED IN EACH WASTE PILE.

2. IF AN EXEMPTION IS SOUGHT TO §264.251 AND SUBPART F OF PART 264 AS PROVIDED BY §264.250(c) ATTACH AN EXPLANATION OF HOW THE REQUIREMENTS OF §264.250(c) WILL BE COMPLIED WITH.

3. ATTACH DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING HOW THE PILE IS OR WILL BE DESIGNED, CONSTRUCTED, OPERATED AND MAINTAINED TO MEET THE REQUIREMENTS OF §264.251. THIS SUBMISSION MUST ADDRESS THE FOLLOWING ITEMS AS SPECIFIED IN §264.251:

    a. THE LINER SYSTEM (EXCEPT FOR AN EXISTING PORTION OF A PILE). IF AN EXEMPTION FROM THE REQUIREMENT FOR A LINER IS SOUGHT, AS PROVIDED BY §264.251(b), THE OWNER OR OPERATOR MUST SUBMIT DETAILED PLANS AND ENGINEERING AND HYDROGEOLOGIC REPORTS AS APPROPRIATE, DESCRIBING ALTERNATE DESIGN AND OPERATING PRACTICES THAT WILL, IN CONJUNCTION WITH LOCATION ASPECTS, PREVENT THE MIGRATION OF ANY HAZARDOUS CONSTITUENTS INTO THE GROUND WATER OR SURFACE WATER AT ANY FUTURE TIME;

    b. CONTROL OF RUN-ON;

    c. CONTROL OF RUN-OFF;

d. MANAGEMENT OF COLLECTION AND HOLDING UNITS ASSOCIATED WITH RUN-ON AND RUN-OFF CONTROL SYSTEMS; AND

e. CONTROL OF WIND DISPERSAL OF PARTICULATE MATTER, WHERE APPLICABLE.

4. IF AN EXEMPTION FROM SUBPART F OF PART 264 IS SOUGHT AS PROVIDED BY §§264.252 OR 264.253, SUBMIT DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING HOW THE REQUIREMENTS OF §§264.252(a) OR 264.253(a) WILL BE COMPLIED WITH.

5. ATTACH A DESCRIPTION OF HOW EACH WASTE PILE, INCLUDING THE LINER AND APPURTENANCES FOR CONTROL OF RUN-ON AND RUN-OFF, WILL BE INSPECTED IN ORDER TO MEET THE REQUIREMENTS OF §264.254(a) AND (b). THIS INFORMATION SHOULD INCLUDE THE INSPECTION PLAN REQUIRED UNDER §264.15*. IF AN EXEMPTION IS SOUGHT TO SUBPART F OF PART 264 PURSUANT TO §264.253, DESCRIBE IN THE INSPECTION PLAN HOW THE INSPECTION REQUIREMENTS OF §264.253(a)(3) WILL BE COMPLIED WITH.

6. IF TREATMENT IS CARRIED OUT ON OR IN THE PILE, ATTACH DETAILS OF THE PROCESS AND EQUIPMENT USED, AND THE NATURE AND QUALITY OF THE RESIDUALS.

*7. IF IGNITABLE OR REACTIVE WASTES ARE TO BE PLACED IN A WASTE PILE, ATTACH AN EXPLANATION OF HOW THE REQUIREMENTS OF §§264.256 AND 264.17 WILL BE COMPLIED WITH.

*8. IF INCOMPATIBLE WASTES, OR INCOMPATIBLE WASTES AND MATERIALS WILL BE PLACED IN A WASTE PILE, ATTACH AN EXPLANATION OF HOW §§264.257 AND 264.17 WILL BE COMPLIED WITH.

9. ATTACH A DESCRIPTION OF HOW HAZARDOUS WASTE RESIDUES AND CONTAMINATED MATERIALS WILL BE REMOVED FROM THE WASTE PILE AT CLOSURE, AS REQUIRED UNDER §264.258(a). FOR ANY WASTE NOT TO BE REMOVED FROM THE WASTE PILE UPON CLOSURE, THE OWNER OR OPERATOR MUS. SUBMIT DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING HOW §264.310(a) AND (b) WILL BE COMPLIED WITH. THIS INFORMATION SHOULD INCLUDE THE CLOSURE PLAN AND, WHERE APPLICABLE, THE POST-CLOSURE PLAN REQUIRED UNDER §§264.112* AND 264.118*.

10. IF APPLICABLE, ATTACH A COPY OF THE NOTICE THAT HAS BEEN PLACED IN THE DEED OR OTHER INSTRUMENT REQUIRED BY §264.120.

*THIS STANDARD IS SUBSTANTIALLY IDENTICAL TO THE CORRESPONDING 40 CFR PART 265 STANDARD.

PART VI - LAND TREATMENT N/A

A. 40 CFR PART 265

1. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.272, INCLUDING TREATMENT, RUN-ON, AND RUN-OFF SYSTEMS.

2. ATTACH A WASTE ANALYSIS PLAN WHICH INCLUDES:

    a. A DETERMINATION OF THE CONCENTRATIONS IN THE WASTE OF ANY SUBSTANCES WHICH EXCEED THE MAXIMUM CONCENTRATIONS CONTAINED IN TABLE I OF §261.24 THAT CAUSE A WASTE TO EXHIBIT THE EP TOXICITY CHARACTERISTIC;

    b. FOR ANY WASTE LISTED IN 40 CFR PART 261, SUBPART D, A DETERMINATION OF THE CONCENTRATIONS OF ANY SUBSTANCES WHICH CAUSED THE WASTE TO BE LISTED AS A HAZARDOUS WASTE; AND

    c. IF FOOD CHAIN CROPS ARE GROWN, A DETERMINATION OF THE CONCENTRATIONS IN THE WASTE OF EACH OF THE FOLLOWING CONSTITUENTS: ARSENIC, CADMIUM, LEAD, AND MERCURY, UNLESS THE OWNER OR OPERATOR HAS WRITTEN, DOCUMENTED DATA THAT SHOW THAT THE CONSTITUENT IS NOT PRESENT.

3. IF APPLICABLE, ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.276, INCLUDING:

    a. TESTS FOR THE SPECIFIC WASTE AND APPLICATION RATES BEING USED AT THE FACILITY;

    b. DESCRIPTIONS OF CROP AND SOIL CHARACTERISTICS, SAMPLE SELECTION CRITERIA, SAMPLE SIZE DETERMINATION, ANALYTICAL METHODS, AND STATISTICAL PROCEDURES; AND

    c. FOR LAND TREATMENT FACILITIES WHICH RECEIVE WASTE CONTAINING CADMIUM, ALL REQUIREMENTS IN §265.276(c).

4. ATTACH A COPY OF THE UNSATURATED ZONE MONITORING PLAN WHICH MEETS ALL THE REQUIREMENTS OF §265.278.

5. ATTACH A COPY OF THE PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.279 (RECORD KEEPING).

6. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §§265.281 (REQUIREMENTS FOR IGNITABLE AND REACTIVE WASTE), AND 265.282 (REQUIREMENTS FOR INCOMPATIBLE WASTES).

7. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH PART 265, SUBPART F (GROUND WATER MONITORING), INCLUDING:

    a. A GROUND WATER MONITORING SYSTEM AS REQUIRED IN §265.91;

    b. A GROUND WATER SAMPLING AND ANALYSIS PLAN AS REQUIRED IN §265.92;

c. AN OUTLINE OF A GROUND WATER QUALITY ASSESSMENT PROGRAM AS REQUIRED IN §265.93(a);

d. THE PREPARATION, EVALUATION, AND RESPONSE REQUIREMENTS OF §265.93(b)-(f); AND

e. THE RECORD KEEPING AND REPORTING REQUIREMENTS OF §265.94.

8. ATTACH A COPY OF THE CLOSURE AND POST-CLOSURE PLAN AS REQUIRED BY §§265.112, 265.118, AND 265.280.

B. 40 CFR PART 264

1. ATTACH A DESCRIPTION OF PLANS TO CONDUCT TREATMENT DEMONSTRATION AS REQUIRED UNDER §264.272. THE DESCRIPTION MUST INCLUDE THE FOLLOWING INFORMATION:

   a. THE WASTES FOR WHICH THE DEMONSTRATION WILL BE MADE AND THE POTENTIAL HAZARDOUS CONSTITUENTS IN THE WASTES;

   b. THE DATA SOURCES TO BE USED TO MAKE THE DEMONSTRATION (E.G., LITERATURE, LABORATORY DATA, FIELD DATA, OR OPERATING DATA);

   c. ANY SPECIFIC LABORATORY OR FIELD TEST THAT WILL BE CONDUCTED, INCLUDING:

      (1) THE TYPE OF TEST (E.G., COLUMN LEACHING, DEGRADATION);
      (2) MATERIALS AND METHODS, INCLUDING ANALYTICAL PROCEDURES;
      (3) EXPECTED TIME FOR COMPLETION;
      (4) CHARACTERISTICS OF THE UNIT THAT WILL BE SIMULATED IN THE DEMONSTRATION, INCLUDING TREATMENT ZONE CHARACTERISTICS, CLIMATIC CONDITIONS, AND OPERATING PRACTICES.

2. ATTACH A DESCRIPTION OF A LAND TREATMENT PROGRAM, AS REQUIRED UNDER §264.271. THIS INFORMATION MUST BE SUBMITTED WITH THE PLANS FOR THE TREATMENT DEMONSTRATION, AND UPDATED FOLLOWING THE TREATMENT DEMONSTRATION. THE LAND TREATMENT PROGRAM MUST ADDRESS THE FOLLOWING ITEMS:

   a. THE WASTES TO BE LAND TREATED;

   b. DESIGN MEASURES AND OPERATING PRACTICES NECESSARY TO MAXIMIZE TREATMENT IN ACCORDANCE WITH §264.273(a) INCLUDING:

      (1) WASTE APPLICATION METHOD AND RATE;
      (2) MEASURES TO CONTROL SOIL pH;
      (3) ENHANCEMENT OF MICROBIAL OR CHEMICAL REACTIONS;
      (4) CONTROL OF MOISTURE CONTENT;

c. PROVISIONS FOR UNSATURATED ZONE MONITORING, INCLUDING:

(1) SAMPLING EQUIPMENT, PROCEDURES, AND FREQUENCY;
(2) PROCEDURES FOR SELECTING SAMPLING LOCATIONS;
(3) ANALYTICAL PROCEDURES;
(4) CHAIN OF CUSTODY CONTROL;
(5) PROCEDURES FOR ESTABLISHING BACKGROUND VALUES;
(6) STATISTICAL METHODS FOR INTERPRETING RESULTS;
(7) THE JUSTIFICATION FOR ANY HAZARDOUS CONSTITUENTS RECOMMENDED FOR SELECTION AS PRINCIPAL HAZARDOUS CONSTITUENTS, IN ACCORDANCE WITH THE CRITERIA FOR SUCH SELECTION IN §264.278(a).

d. A LIST OF HAZARDOUS CONSTITUENTS REASONABLY EXPECTED TO BE IN, OR DERIVED FROM, THE WASTES TO BE LAND TREATED BASED ON WASTE ANALYSIS PERFORMED PURSUANT TO §264.13;

e. THE PROPOSED DIMENSIONS OF THE TREATMENT ZONE.

3. ATTACH A DESCRIPTION OF HOW THE UNIT IS OR WILL BE DESIGNED, CONSTRUCTED, OPERATED, AND MAINTAINED IN ORDER TO MEET THE REQUIREMENTS OF §264.273. THIS SUBMISSION MUST ADDRESS THE FOLLOWING ITEMS:

a. CONTROL OF RUN-ON;

b. COLLECTION AND CONTROL OF RUN-OFF;

c. MINIMIZATION OF RUN-OFF OF HAZARDOUS CONSTITUENTS FROM THE TREATMENT ZONE;

d. MANAGEMENT OF COLLECTION AND HOLD FACILITIES ASSOCIATED WITH RUN-ON AND RUN-OFF CONTROL SYSTEMS;

e. PERIODIC INSPECTION OF THE UNIT. THIS INFORMATION SHOULD INCLUDE A COPY OF THE INSPECTION PROCEDURES REQUIRED UNDER §264.15*;

f. CONTROL OF WIND DISPERSAL OF PARTICULATE MATTER, IF APPLICABLE.

4. IF FOOD-CHAIN CROPS ARE TO BE GROWN IN OR ON THE TREATMENT ZONE OF THE LAND TREATMENT UNIT, ATTACH A DESCRIPTION OF HOW THE DEMONSTRATION REQUIRED UNDER §264.276(a) WILL BE CONDUCTED INCLUDING:

a. CHARACTERISTICS OF THE FOOD-CHAIN CROP FOR WHICH THE DEMONSTRATION WILL BE MADE;

b. CHARACTERISTICS OF THE WASTE, TREATMENT ZONE, AND WASTE APPLICATION METHOD AND RATE TO BE USED IN THE DEMONSTRATION;

c. PROCEDURES FOR CROP GROWTH, SAMPLE COLLECTION, SAMPLE ANALYSIS, AND DATA EVALUATION;

d. CHARACTERISTICS OF THE COMPARISON CROP INCLUDING THE LOCATION AND CONDITIONS UNDER WHICH IT WAS OR WILL BE GROWN.

5. IF FOOD-CHAIN CROPS ARE TO BE GROWN, AND CADMIUM IS PRESENT IN THE LAND-TREATED WASTE, ATTACH A DESCRIPTION OF HOW THE REQUIRMENTS OF §264.276(b) WILL BE COMPLIED WITH.

6. A DESCRIPTION OF THE VEGETATIVE COVER TO BE APPLIED TO CLOSED PORTIONS OF THE FACILITY, AND A PLAN FOR MAINTAINING SUCH COVER DURING THE POST-CLOSURE CARE PERIOD, AS REQUIRED UNDER §264.280(a)(8) AND §264.280(c)(2). THIS INFORMATION SHOULD INCLUDE THE CLOSURE PLAN AND, WHERE APPLICABLE, THE POST-CLOSURE CARE PLAN REQUIRED UNDER §§264.112* AND 264.118*.

7. IF IGNITABLE OR REACTIVE WASTES WILL BE PLACED IN OR ON THE TREATMENT ZONE, AN EXPLANATION OF HOW THE REQUIREMENTS OF §§264.281 AND 264.17* WILL BE COMPLIED WITH.

8. IF INCOMPATIBLE WASTES, OR INCOMPATIBLE WASTES AND MATERIALS, WILL BE PLACED IN OR ON THE SAME TREATMENT ZONE, AN EXPLANATION OF HOW §§264.282 and 264.17* WILL BE COMPLIED WITH.

*THIS STANDARD IS SUBSTANTIALLY IDENTICAL TO THE CORRESPONDING 40 CFR PART 265 STANDARD.

A. 40 CFR PART 265

1. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.302, INCLUDING DIVERSION OF RUN-ON, COLLECTION OF RUN-OFF, AND COVER REQUIREMENTS.

2. ATTACH A SKETCH OR MAP SHOWING THE EXACT LOCATION AND DIMENSIONS, INCLUDING DEPTH OF EACH CELL WITH RESPECT TO PERMANENTLY SURVEYED BENCHMARKS; AND THE CONTENTS OF EACH CELL AND THE APPROXIMATE LOCATION OF EACH HAZARDOUS WASTE TYPE WITHIN EACH CELL.

3. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.315 (REQUIREMENTS FOR CONTAINERS).

4. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH PART 265, SUBPART F (GROUND WATER MONITORING), INCLUDING:

    a. A GROUND WATER MONITORING SYSTEM AS REQUIRED IN §265.91;

    b. A GROUND WATER SAMPLING AND ANALYSIS PLAN AS REQUIRED IN §265.92;

    c. AN OUTLINE OF A GROUND WATER QUALITY ASSESSMENT PROGRAM AS REQUIRED IN §265.93(a);

    d. THE PREPARATION, EVALUATION, AND RESPONSE REQUIREMENTS OF §265.93(b)-(f); AND

    e. THE RECORD KEEPING AND REPORTING REQUIREMENTS OF §265.94.

5. ATTACH A COPY OF THE CLOSURE AND POST-CLOSURE PLAN AS REQUIRED BY §§265.112, 265.118, AND 265.310.

6. ATTACH A COPY OF THE NOTICE THAT HAS BEEN PLACED IN THE DEED OR OTHER INSTRUMENT REQUIRED BY §265.120.

B. 40 CFR PART 264

1. ATTACH A LIST OF THE HAZARDOUS WASTES PLACED OR TO BE PLACED IN EACH LANDFILL OR LANDFILL CELL.

2. ATTACH DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING HOW THE LANDFILL IS OR WILL BE DESIGNED, CONSTRUCTED, OPERATED, AND MAINTAINED TO COMPLY WITH THE REQUIREMENTS OF §264.301. THIS SUBMISSION MUST ADDRESS THE FOLLOWING ITEMS AS SPECIFIED IN §264.301:

    a. THE LINER SYSTEM AND LEACHATE COLLECTION AND REMOVAL SYSTEM (EXCEPT FOR AN EXISTING PORTION OF A LANDFILL). IF AN EXEMPTION FROM THE REQUIREMENTS FOR A LINER AND A LEACHATE COLLECTION AND REMOVAL SYSTEM IS SOUGHT AS PROVIDED

BY §264.301(b), SUBMIT DETAILED PLANS AND ENGINEERING AND HYDROGEOLOGIC REPORTS AS APPROPRIATE, DESCRIBING ALTERNATE DESIGN AND OPERATING PRACTICES THAT WILL, IN CONJUNCTION WITH LOCATION ASPECTS, PREVENT THE MIGRATION OF ANY HAZARDOUS CONSTITUENT INTO THE GROUND WATER OR SURFACE WATER AT ANY FUTURE TIME;

b. CONTROL OF RUN-ON;

c. CONTROL OF RUN-OFF;

d. MANAGEMENT OF COLLECTION AND HOLDING FACILITIES ASSOCIATED WITH RUN-ON AND RUN-OFF CONTROL SYSTEMS; AND

e. CONTROL OF WIND DISPERSAL OF PARTICULATE MATTER, WHERE APPLICABLE.

3. IF AN EXEMPTION FROM SUBPART F OF PART 264 IS SOUGHT, AS PROVIDED BY §264.302(a), THE OWNER OR OPERATOR MUST SUBMIT DETAILED PLANS AND AN ENGINEERING REPORT EXPLAINING THE LOCATION OF THE SATURATED ZONE IN RELATION TO THE LANDFILL, THE DESIGN OF A DOUBLE-LINER SYSTEM THAT INCORPORATES A LEAK DETECTION SYSTEM BETWEEN THE LINERS, AND A LEACHATE COLLECTION AND REMOVAL SYSTEM ABOVE THE LINERS.

4. ATTACH A DESCRIPTION OF HOW EACH LANDFILL, INCLUDING THE LINER AND COVER SYSTEMS, WILL BE INSPECTED IN ORDER TO MEET THE REQUIREMENTS OF §264.303(a) AND (b). THIS INFORMATION SHOULD INCLUDE THE INSPECTION PLAN REQUIRED UNDER §264.15*.

5. ATTACH DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING THE FINAL COVER WHICH WILL BE APPLIED TO EACH LANDFILL OR LANDFILL CELL AT CLOSURE IN ACCORDANCE WITH §264.310(a), AND A DESCRIPTION OF HOW EACH LANDFILL WILL BE MAINTAINED AND MONITORED AFTER CLOSURE IN ACCORDANCE WITH §264.310(b). THIS INFORMATION SHOULD INCLUDE THE CLOSURE AND POST-CLOSURE PLANS REQUIRED UNDER §§264.112* AND 264.118*.

*6. IF IGNITABLE OR REACTIVE WASTES WILL BE LANDFILLED, ATTACH AN EXPLANATION OF HOW THE REQUIREMENTS OF §§264.312 AND 264.17 WILL BE COMPLIED WITH.

*7. IF INCOMPATIBLE WASTES, OR INCOMPATIBLE WASTES AND MATERIALS WILL BE LANDFILLED, ATTACH AN EXPLANATION OF HOW §§264.313 AND 264.17 WILL BE COMPLIED WITH.

*8. IF BULK OR NON-CONTAINERIZED LIQUID WASTE OR WASTE CONTAINING FREE LIQUIDS IS TO BE LANDFILLED, ATTACH AN EXPLANATION OF HOW THE REQUIREMENTS OF CHAPTER 17-30.18(3) WILL BE COMPLIED WITH.

9. IF CONTAINERS OF HAZARDOUS WASTE ARE TO BE LANDFILLED, ATTACH AN EXPLANATION OF HOW THE REQUIREMENTS OF §§264.315 OR 264.316*, AS APPLICABLE, WILL BE COMPLIED WITH.

10. ATTACH A COPY OF THE NOTICE THAT HAS BEEN PLACED IN THE DEED OR OTHER INSTRUMENT REQUIRED BY §264.120.

*THIS STANDARD IS SUBSTANTIALLY IDENTICAL TO THE CORRESPONDING 40 CFR PART 265 STANDARD.

A. 40 CFR PART 265

ATTACH EITHER A DEMONSTRATION OF THE EXCLUSION IN §265.340 OR:

1. A WASTE ANALYSIS PLAN, WHICH INCLUDES THE ANALYSIS OF ANY WASTE WHICH HAS NOT PREVIOUSLY BEEN BURNED IN THE INCINERATOR IN ORDER TO ESTABLISH STEADY STATE (NORMAL) OPERATING CONDITIONS (INCLUDING WASTE AND AUXILIARY FUEL FEED AND AIR FLOW), AND TO DETERMINE THE TYPE OF POLLUTANTS WHICH MIGHT BE EMITTED. AT A MINIMUM, THE ANALYSIS MUST DETERMINE:

    a. HEATING VALUE OF THE WASTE;

    b. HALOGEN CONTENT AND SULFUR CONTENT IN THE WASTE; AND

    c. CONCENTRATIONS IN THE WASTE OF LEAD AND MERCURY, UNLESS THE OWNER OR OPERATOR HAS WRITTEN, DOCUMENTED DATA THAT SHOW THAT THE ELEMENT IS NOT PRESENT.

2. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.345 (GENERAL OPERATING REQUIREMENTS) AND §265.347 (MONITORING AND INSPECTIONS).

B. 40 CFR PART 264

1. THE APPLICANT MUST FULFILL THE REQUIREMENTS OF EITHER SECTION A), B), OR C):

A) WHEN SEEKING AN EXEMPTION UNDER §264.340(b) OR (c) (IGNITABLE, CORROSIVE OR REACTIVE WASTES ONLY), ATTACH DOCUMENTATION SHOWING:

(1) THAT THE WASTE IS LISTED AS A HAZARDOUS WASTE IN PART 261, SUBPART D, SOLELY BECAUSE IT IS IGNITABLE (HAZARD CODE I), CORROSIVE (HAZARD CODE C), OR BOTH; OR

(2) THAT THE WASTE IS LISTED AS A HAZARDOUS WASTE IN PART 261, SUBPART D, SOLELY BECAUSE IT IS REACTIVE (HAZARD CODE R) FOR CHARACTERISTICS OTHER THAN THOSE LISTED IN §261.23(a)(4) AND (5), AND WILL NOT BE BURNED WHEN OTHER HAZARDOUS WASTES ARE PRESENT IN THE COMBUSTION ZONE; OR

(3) THAT THE WASTE IS A HAZARDOUS WASTE SOLELY BECAUSE IT POSSESSES THE CHARACTERISTIC OF IGNITABILITY, CORROSIVITY, OR BOTH, AS DETERMINED BY THE TESTS FOR CHARACTERISTICS OF HAZARDOUS WASTES UNDER PART 261, SUBPART C; OR

(4) THAT THE WASTE IS A HAZARDOUS WASTE SOLELY BECAUSE IT POSSESSES THE REACTIVITY CHARACTERISTICS LISTED IN §261.23(a)(1), (2), (3), (6), (7), or (8), AND THAT IT WILL NOT BE BURNED WHEN OTHER HAZARDOUS WASTES ARE PRESENT IN THE COMBUSTION ZONE.

B) SUBMIT THE RESULTS OF A TRIAL BURN CONDUCTED IN ACCORDANCE WITH AND INCLUDING ALL THE DETERMINATIONS REQUIRED BY THE FOLLOWING:

(1) THE TRIAL BURN MUST BE CONDUCTED IN ACCORDANCE WITH A TRIAL BURN PLAN PREPARED BY THE APPLICANT AND APPROVED BY THE DEPARTMENT. THE TRIAL BURN PLAN WILL THEN BECOME A CONDITION OF THE PERMIT. THE TRIAL BURN PLAN WILL INCLUDE THE FOLLOWING INFORMATION:

a. AN ANALYSIS OF EACH WASTE, OR MIXTURE OF WASTES, TO BE BURNED WHICH INCLUDES:

(1) HEAT VALUE OF THE WASTE IN THE FORM AND COMPOSITION IN WHICH IT WILL BE BURNED:

(2) VISCOSITY (IF APPLICABLE), OR DESCRIPTION OF PHYSICAL FORM OF THE WASTE:

(3) AN IDENTIFICATION OF ANY HAZARDOUS ORGANIC CONSTITUENTS LISTED IN 40 CFR PART 261, APPENDIX VIII, WHICH ARE PRESENT IN THE WASTE TO BE BURNED, EXCEPT THAT THE APPLICANT NEED NOT ANALYZE FOR CONSTITUENTS LISTED IN 40 CFR PART 261, APPENDIX VIII, WHICH WOULD REASONABLY NOT BE EXPECTED TO BE FOUND IN THE WASTE. THE CONSTITUENTS EXCLUDED FROM ANALYSIS MUST BE IDENTIFIED AND THE BASIS FOR THEIR EXCLUSION STATED. THE WASTE ANALYSIS MUST RELY ON ANALYTICAL TECHNIQUES SPECIFIED IN "TEST METHODS FOR THE EVALUATION OF SOLID WASTE, PHYSICAL/ CHEMICAL METHODS" (INCORPORATED BY REFERENCE), OR THEIR EQUIVALENT;

(4) AN APPROXIMATE QUANTIFICATION OF THE HAZARDOUS CONSTITUENTS IDENTIFIED IN THE WASTE, WITHIN THE PRECISION PRODUCED BY THE ANALYTICAL METHODS SPECIFIED IN "TEST METHODS FOR THE EVALUATION OF SOLID WASTE, PHYSICAL/CHEMICAL METHODS" (INCORPORATED BY REFERENCE), OR THEIR EQUIVALENT.

b. A DETAILED ENGINEERING DESCRIPTION OF THE INCINERATOR FOR WHICH THE PERMIT IS SOUGHT, INCLUDING:

(1) MANUFACTURER'S NAME AND MODEL NUMBER OF INCINERATOR (IF AVAILABLE);

(2) TYPE OF INCINERATOR;

(3) LINEAR DIMENSIONS OF THE INCINERATOR UNIT INCLUDING THE CROSS SECTIONAL AREA OF COMBUSTION CHAMBER;

(4) DESCRIPTION OF THE AUXILIARY FUEL SYSTEM (TYPE/FEED);

(5) CAPACITY OF PRIME MOVER;

(6) DESCRIPTION OF AUTOMATIC WASTE FEED CUT-OFF SYSTEM(S);

(7) STACK GAS MONITORING AND POLLUTION CONTROL EQUIPMENT;

(8) NOZZLE AND BURNER DESIGN;

(9) CONSTRUCTION MATERIALS; AND

(10) LOCATION AND DESCRIPTION OF TEMPERATURE, PRESSURE, AND FLOW INDICATING AND CONTROL DEVICES.

c. A DETAILED DESCRIPTION OF SAMPLING AND MONITORING PROCEDURES, INCLUDING SAMPLING AND MONITORING LOCATIONS IN THE SYSTEM, THE EQUIPMENT TO BE USED, SAMPLING AND MONITORING FREQUENCY, AND PLANNED ANALYTICAL PROCEDURES FOR SAMPLE ANALYSIS.

d. A DETAILED TEST SCHEDULE FOR EACH WASTE FOR WHICH THE TRIAL BURN IS PLANNED INCLUDING DATE(S), DURATION, QUANTITY OF WASTE TO BE BURNED, AND OTHER FACTORS RELEVANT TO THE DEPARTMENT'S DECISION UNDER PARAGRAPH (4) OF THIS SECTION.

e. A DETAILED TEST PROTOCOL, INCLUDING, FOR EACH WASTE IDENTIFIED, THE RANGES OF TEMPERATURE, WASTE FEED RATE, COMBUSTION GAS VELOCITY, USE OF AUXILIARY FUEL, AND ANY OTHER RELEVANT PARAMETERS THAT WILL BE VARIED TO AFFECT THE DESTRUCTION AND REMOVAL EFFICIENCY OF THE INCINERATOR.

f. A DESCRIPTION OF, AND PLANNED OPERATING CONDITIONS FOR, ANY EMISSION CONTROL EQUIPMENT WHICH WILL BE USED.

g. PROCEDURES FOR RAPIDLY STOPPING WASTE FEED, SHUTTING DOWN THE INCINERATOR, AND CONTROLLING EMISSIONS IN THE EVENT OF AN EQUIPMENT MALFUNCTION.

h. SUCH OTHER INFORMATION AS THE DEPARTMENT REASONABLY FINDS NECESSARY TO DETERMINE WHETHER TO APPROVE THE TRIAL BURN PLAN IN LIGHT OF THE PURPOSES OF THIS PARAGRAPH AND THE CRITERIA IN PARAGRAPH (4) OF THIS SECTION.

(2) THE DEPARTMENT, IN REVIEWING THE TRIAL BURN PLAN, SHALL EVALUATE THE SUFFICIENCY OF THE INFORMATION PROVIDED AND MAY REQUIRE THE APPLICANT TO SUPPLEMENT THIS INFORMATION, IF NECESSARY, TO ACHIEVE THE PURPOSES OF THIS PARAGRAPH.

(3) BASED ON THE WASTE ANALYSIS DATA IN THE TRIAL BURN PLAN, THE DEPARTMENT WILL SPECIFY AS TRIAL PRINCIPAL ORGANIC HAZARDOUS CONSTITUENTS (TRIAL POHC'S), THOSE CONSTITUENTS FOR WHICH DESTRUCTION AND REMOVAL EFFICIENCIES MUST BE CALCULATED DURING THE TRIAL BURN. THESE TRIAL POHC'S WILL BE SPECIFIED BY THE DEPARTMENT BASED ON ITS ESTIMATE OF THE DIFFICULTY OF INCINERATION OF THE CONSTITUENTS IDENTIFIED IN THE WASTE ANALYSIS, THEIR CONCENTRATION OR MASS IN THE WASTE FEED, AND, FOR WASTES LISTED IN 40 CFR PART 261, SUBPART D, THE HAZARDOUS WASTE ORGANIC CONSTITUENT OF CONSTITUENTS IDENTIFIED IN APPENDIX VII OF THAT PART AS THE BASIS FOR LISTING.

(4) THE DEPARTMENT SHALL APPROVE A TRIAL BURN PLAN IF IT FINDS THAT:

a. THE TRIAL BURN IS LIKELY TO DETERMINE WHETHER THE INCINERATOR PERFORMANCE STANDARD REQUIRED BY §264.343 CAN BE MET.

b. THE TRIAL BURN ITSELF WILL NOT PRESENT AN IMMINENT HAZARD TO HUMAN HEALTH OR THE ENVIRONMENT.

c. THE TRIAL BURN WILL HELP THE DEPARTMENT TO DETERMINE OPERATING REQUIREMENTS TO BE SPECIFIED UNDER §264.345.

d. THE INFORMATION SOUGHT IN PARAGRAPHS (4)(a) AND (c) OF THIS SECTION CANNOT REASONABLY BE DEVELOPED THROUGH OTHER MEANS.

(5) a. DURING EACH APPROVED TRIAL BURN (OR AS SOON AFTER THE BURN AS IS PRACTICABLE), THE APPLICANT MUST MAKE THE FOLLOWING DETERMINATIONS:

(1) A QUANTITATIVE ANALYSIS OF THE TRIAL POHC'S IN THE WASTE FEED TO THE INCINERATOR;

(2) A QUANTITATIVE ANALYSIS OF THE EXHAUST GAS FOR THE CONCENTRATION AND MASS EMISSIONS OF THE TRIAL POHC'S, OXYGEN (O_2) AND HYDROGEN CHLORIDE (HCl);

(3) A QUANTITATIVE ANALYSIS OF THE SCRUBBER WATER (IF ANY), ASH RESIDUES, AND OTHER RESIDUES, FOR THE PURPOSE OF ESTIMATING THE FATE OF TRIAL POHC'S;

(4) A COMPUTATION OF DESTRUCTION AND REMOVAL EFFICIENCY (DRE), IN ACCORDANCE WITH THE DRE FORMULA SPECIFIED IN §264.343(a);

(5) IF THE HCl EMISSION RATE EXCEEDS 1.8 KILOGRAMS OF HCl PER HOUR (4 LBS PER HOUR), A COMPUTATION OF HCl REMOVAL EFFICIENCY, IN ACCORDANCE WITH §264.343(b);

(6) A COMPUTATION OF PARTICULATE EMISSIONS, IN ACCORDANCE WITH §264.343(c);

(7) AN IDENTIFICATION OF SOURCES OF FUGITIVE EMISSIONS AND THEIR MEANS OF CONTROL;

(8) A MEASUREMENT OF AVERAGE, MAXIMUM, AND MINIMUM TEMPERATURES, AND COMBUSTION GAS VELOCITY;

(9) A CONTINUOUS MEASUREMENT OF CARBON MONOXIDE (CO) IN THE EXHAUST GAS; AND

(10) SUCH OTHER INFORMATION AS THE DEPARTMENT MAY SPECIFY AS NECESSARY TO ENSURE THAT THE TRIAL BURN WILL DETERMINE COMPLIANCE WITH THE PERFORMANCE STANDARD IN §264.343 AND TO ESTABLISH THE OPERATING CONDITIONS REQUIRED BY §264.345 AS NECESSARY TO MEET THAT PERFORMANCE STANDARD.

b. THE APPLICANT SHALL SUBMIT TO THE DEPARTMENT A CERTIFICATION THAT THE TRIAL BURN HAS BEEN CARRIED OUT IN ACCORDANCE WITH THE APPROVED TRIAL BURN PLAN, AND THE RESULTS OF ALL THE DETERMINATIONS REQUIRED IN PARAGRAPH (5)(a) OF THIS SECTION. THIS SUBMISSION SHALL BE MADE WITHIN 90 DAYS OF THE COMPLETION OF THE TRIAL BURN, OR LATER IF APPROVED BY THE DEPARTMENT.

c. ALL DATA COLLECTED DURING ANY TRIAL BURN MUST BE SUBMITTED TO THE DEPARTMENT FOLLOWING THE COMPLETION OF THE TRIAL BURN.

d. ALL SUBMISSIONS REQUIRED BY THIS PARAGRAPH SHALL BE CERTIFIED ON BEHALF OF THE APPLICANT BY THE SIGNATURE OF A PERSON AUTHORIZED TO SIGN A PERMIT APPLICATION OR A REPORT.

C) IN LIEU OF A TRIAL BURN, THE APPLICANT MAY SUBMIT THE FOLLOWING INFORMATION:

(1) AN ANALYSIS OF EACH WASTE OR MIXTURE OF WASTES TO BE BURNED INCLUDING:

a. HEAT VALUE OF THE WASTE IN THE FORM AND COMPOSITION IN WHICH IT WILL BE BURNED;

b. VISCOSITY (IF APPLICABLE), OR DESCRIPTION OF PHYSICAL FORM OF THE WASTE;

c. AN IDENTIFICATION OF ANY HAZARDOUS ORGANIC CONSTITUENTS LISTED IN PART 261, APPENDIX VIII, WHICH ARE PRESENT IN THE WASTE TO BE BURNED, EXCEPT THAT THE APPLICANT NEED NOT ANALYZE FOR CONSTITUENTS LISTED IN PART 261, APPENDIX VIII, WHICH WOULD REASONABLY NOT BE EXPECTED TO BE FOUND IN THE WASTE. THE CONSTITUENTS EXCLUDED FROM ANALYSIS MUST BE IDENTIFIED AND THE BASIS FOR THEIR EXCLUSION STATED. THE WASTE ANALYSIS MUST RELY ON ANALYTICAL TECHNIQUES SPECIFIED IN "TEST METHODS FOR THE EVALUATION OF SOLID WASTE, PHYSICAL/CHEMICAL METHODS" (INCORPORATED BY REFERENCE) OR THEIR EQUIVALENT;

d. AN APPROXIMATE QUANTIFICATION OF THE HAZARDOUS CONSTITUENTS IDENTIFIED IN THE WASTE, WITHIN THE PRECISION PRODUCED BY THE ANALYTICAL METHODS SPECIFIED IN "TEST METHODS FOR THE EVALUATION OF SOLID WASTE, PHYSICAL/CHEMICAL METHODS" (INCORPORATED BY REFERENCE);AND

e. A QUANTIFICATION OF THOSE HAZARDOUS CONSTITUENTS IN THE WASTE WHICH MAY BE DESIGNATED AS POHC'S BASED ON DATA SUBMITTED FROM OTHER TRIAL OR OPERATIONAL BURNS WHICH DEMONSTRATE COMPLIANCE WITH THE PERFORMANCE STANDARD IN §264.343.

(2) A DETAILED ENGINEERING DESCRIPTION OF THE INCINERATOR, INCLUDING:

a. MANUFACTURER'S NAME AND MODEL NUMBER OF INCINERATOR;

b. TYPE OF INCINERATOR;

c. LINEAR DIMENSION OF INCINERATOR UNIT INCLUDING CROSS SECTIONAL AREA OF COMBUSTION CHAMBER;

d. DESCRIPTION OF AUXILIARY FUEL SYSTEM (TYPE/FEED);

e. CAPACITY OF PRIME MOVER;

f. DESCRIPTION OF AUTOMATIC WASTE FEED CUTOFF SYSTEM(S);

g. STACK GAS MONITORING AND POLLUTION CONTROL MONITORING SYSTEM;

h. NOZZLE AND BURNER DESIGN;

i. CONSTRUCTION MATERIALS; AND

j. LOCATION AND DESCRIPTION OF TEMPERATURE, PRESSURE, AND FLOW INDICATING DEVICES AND CONTROL DEVICES.

(3) A DESCRIPTION AND ANALYSIS OF THE WASTE TO BE BURNED COMPARED WITH THE WASTE FOR WHICH DATA FROM OPERATIONAL OR TRIAL BURNS ARE PROVIDED TO SUPPORT THE CONTENTION THAT A TRIAL BURN IS NOT NEEDED. THE DATA SHOULD INCLUDE THOSE ITEMS LISTED IN THIS PART. THIS ANALYSIS SHOULD SPECIFY THE POHC'S WHICH THE APPLICANT HAS IDENTIFIED IN THE WASTE FOR WHICH A PERMIT IS SOUGHT, AND ANY DIFFERENCES FROM THE POHC's IN THE WASTE FOR WHICH BURN DATA ARE PROVIDED.

(4) THE DESIGN AND OPERATING CONDITIONS OF THE INCINERATOR UNIT TO BE USED, COMPARED WITH THAT FOR WHICH COMPARATIVE BURN DATA ARE AVAILABLE.

(5) A DESCRIPTION OF THE RESULTS SUBMITTED FROM ANY PREVIOUSLY CONDUCTED TRIAL BURN(S), INCLUDING:

a. SAMPLING AND ANALYSIS TECHNIQUES USED TO CALCULATE PERFORMANCE STANDARDS IN §264.343;

b. METHODS AND RESULTS OF MONITORING TEMPERATURES, WASTE FEED RATES, CARBON MONOXIDE, AND AN APPROPRIATE INDICATOR OF COMBUSTION GAS VELOCITY (INCLUDING A STATEMENT CONCERNING THE PRECISION AND ACCURACY OF THIS MEASUREMENT): AND

c. THE CERTIFICATION AND RESULTS REQUIRED BY PARAGRAPH (B)(5)(b).

(6) THE EXPECTED INCINERATOR OPERATION INFORMATION TO DEMONSTRATE COMPLIANCE WITH §§264.343 AND 264.345, INCLUDING:

a. EXPECTED CARBON MONOXIDE (CO) LEVEL IN THE STACK EXHAUST GAS;

b. WASTE FEED RATE;

c. COMBUSTION ZONE TEMPERATURE;

d. INDICATION OF COMBUSTION GAS VELOCITY;

e. EXPECTED STACK GAS VOLUME, FLOW RATE, AND TEMPERATURE;

f. COMPUTED RESIDENCE TIME FOR WASTE IN THE COMBUSTION ZONE;

g. EXPECTED HYDROCHLORIC ACID REMOVAL EFFICIENCY;

h. EXPECTED FUGITIVE EMISSIONS AND THEIR CONTROL PROCEDURES; AND

i. PROPOSED WASTE FEED CUT-OFF LIMITS BASED ON THE IDENTIFIED SIGNIFICANT OPERATING PARAMETERS.

(7) SUCH SUPPLEMENTAL INFORMATION AS THE DEPARTMENT FINDS NECESSARY TO ACHIEVE THE PURPOSES OF THIS PARAGRAPH.

(8) WASTE ANALYSIS DATA, INCLUDING THAT SUBMITTED IN PARAGRAPH (1) OF THIS SECTION, SUFFICIENT TO ALLOW THE DEPARTMENT TO SPECIFY AS PERMIT PRINCIPAL ORGANIC HAZARDOUS CONSTITUENTS (PERMIT POHC'S) THOSE CONSTITUENTS FOR WHICH DESTRUCTION AND REMOVAL EFFICIENCIES WILL BE REQUIRED.

(9) THE DEPARTMENT SHALL APPROVE A PERMIT APPLICATION WITHOUT A TRIAL BURN IF IT FINDS THAT:

a. THE WASTES ARE SUFFICIENTLY SIMILAR; AND

b. THE INCINERATOR UNITS ARE SUFFICIENTLY SIMILAR, AND THE DATA FROM OTHER TRIAL BURNS ARE ADEQUATE TO SPECIFY (UNDER §264.345) OPERATING CONDITIONS THAT WILL ENSURE THAT THE PERFORMANCE STANDARDS IN §264.343 WILL BE MET BY THE INCINERATOR.

2. ATTACH A COPY OF THE INSPECTION SCHEDULE WHICH DEMONSTRATES COMPLIANCE WITH §264.15* (GENERAL INSPECTION REQUIREMENTS). UNLESS EXEMPTED IN ACCORDANCE WITH §264.340, INCLUDE A DEMONSTRATION OF COMPLIANCE WITH §264.347 (MONITORING AND INSPECTIONS).

*3. ATTACH A COPY OF THE CLOSURE PLAN AS REQUIRED IN §§264.112 AND 264.351.

*THIS STANDARD IS SUBSTANTIALLY IDENTICAL TO THE CORRESPONDING 40 CFR PART 265 STANDARD.

A. 40 CFR PART 265

1. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.373 (GENERAL OPERATING REQUIREMENTS).

2. ATTACH A COPY OF THE PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.377 (MONITORING AND INSPECTIONS) AND §265.15 (GENERAL INSPECTION REQUIREMENTS).

3. ATTACH A WASTE ANALYSIS PLAN WHICH INCLUDES THE ANALYSIS OF ANY WASTE WHICH HAS NOT PREVIOUSLY BEEN TREATED IN THE THERMAL PROCESS IN ORDER TO ESTABLISH STEADY STATE (NORMAL) OR OTHER APPROPRIATE (FOR A NON-CONTINUOUS PROCESS) OPERATING CONDITIONS (INCLUDING WASTE AND AUXILIARY FUEL FEED) AND TO DETERMINE THE TYPE OF POLLUTANTS WHICH MIGHT BE EMITTED. AT A MINIMUM, THE ANALYSIS MUST DETERMINE:

    a. HEATING VALUE OF THE WASTE;

    b. HALOGEN CONTENT AND SULFUR CONTENT IN THE WASTE; AND

    c. CONCENTRATIONS IN THE WASTE OF LEAD AND MERCURY, UNLESS THE OWNER OR OPERATOR HAS WRITTEN, DOCUMENTED DATA THAT SHOW THAT THE ELEMENT IS NOT PRESENT.

4. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §§265.382 (OPEN BURNING; WASTE EXPLOSIVES), AND 265.17.

5. ATTACH A COPY OF THE CLOSURE PLAN AS REQUIRED BY §§265.112 AND 265.381.

B. 40 CFR PART 264

(RESERVED)

PART X - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT N/A

A. 40 CFR PART 265

1. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.401 (GENERAL OPERATING REQUIREMENTS).

2. ATTACH A COPY OF THE INSPECTION PROCEDURES REQUIRED IN §§265.403 AND 265.15.

3. FOR FACILITIES WHICH TREAT A WASTE WHICH IS SUBSTANTIALLY DIFFERENT FROM WASTES PREVIOUSLY TREATED, OR USE A SUBSTANTIALLY DIFFERENT PROCESS FROM THAT PREVIOUSLY USED, ATTACH WASTE ANALYSIS AND TRIAL TREATMENT TESTS, OR ATTACH DOCUMENTED INFORMATION ON SIMILAR TREATMENT.

4. ATTACH A DESCRIPTION OF THE DESIGN AND OPERATION PROCEDURES WHICH DEMONSTRATE COMPLIANCE WITH §265.405 (SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES), §265.406 (SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES), AND §265.17.

5. ATTACH A COPY OF THE CLOSURE PLAN AS REQUIRED BY §§265.112 AND 265.404.

B. 40 CFR PART 264

(RESERVED)

ATTACHMENT 6

1. IF CLOSURE OR POST-CLOSURE PLANS HAVE NOT BEEN APPROVED BY THE DEPARTMENT AS PART OF A TOP, CONSTRUCTION, OR OPERATION PERMIT APPLICATION, ATTACH A COPY OF A CLOSURE AND POST-CLOSURE PLAN AS REQUIRED BY §§265.112 AND 265.118.

2. IF CLOSURE AND POST-CLOSURE PLANS HAVE PREVIOUSLY BEEN APPROVED BY THE DEPARTMENT, EITHER:

   a) ATTACH A CERTIFICATION STATING THAT NO CHANGES HAVE BEEN MADE TO THE PLANS WHICH HAVE BEEN PROVIDED TO THE DEPARTMENT; OR

   b) PROVIDE AN AMENDED PLAN SHOWING ALL CHANGES WHICH HAVE BEEN MADE, OR HAVE BEEN PROPOSED, TO THE PLANS WHICH HAVE BEEN PROVIDED TO THE DEPARTMENT.

PART XII - COMPLIANCE SCHEDULE N/A

A. COMPLIANCE SCHEDULE (Complete for TOPs only)

1. THE APPLICANT MAY, AT HIS OPTION, PROPOSE A COMPLIANCE SCHEDULE FOR ACHIEVING COMPLIANCE WITH ANY STANDARDS THAT HAVE NOT BEEN MET AT THIS TIME. THE DEPARTMENT WILL TAKE THIS PROPOSAL INTO CONSIDERATION WHEN DEVELOPING THE TOP COMPLIANCE SCHEDULE.

PART XIII - GROUND WATER PROTECTION (N/A)

A. SUBPART F REQUIREMENTS

THE FOLLOWING ADDITIONAL INFORMATION REGARDING PROTECTION OF GROUND WATER IS REQUIRED FROM OWNERS OR OPERATORS OF HAZARDOUS WASTE SURFACE IMPOUNDMENTS, PILES, LAND TREATMENT UNITS, AND LANDFILLS, EXCEPT AS OTHERWISE PROVIDED IN §264.90(b) or Section 17-30.18(7), FAC:

1. A SUMMARY OF THE GROUND WATER MONITORING DATA OBTAINED DURING THE INTERIM STATUS PERIOD UNDER §§265.90-265.94, WHERE APPLICABLE.

2. IDENTIFICATION OF THE UPPERMOST AQUIFER AND AQUIFERS HYDRAULICALLY INTERCONNECTED BENEATH THE FACILITY PROPERTY, INCLUDING GROUND WATER FLOW DIRECTION AND RATE, AND THE BASIS FOR SUCH IDENTIFICATION (I.E., THE INFORMATION OBTAINED FROM HYDROGEOLOGIC INVESTIGATIONS OF THE FACILITY AREA).

3. ON THE TOPOGRAPHIC MAP REQUIRED UNDER PART I-B-3, A DELINEATION OF THE WASTE MANAGEMENT AREA, THE PROPERTY BOUNDARY, THE PROPOSED "POINT OF COMPLIANCE" AS DEFINED UNDER §264.95, THE PROPOSED LOCATION OF GROUND WATER MONITORING WELLS AS REQUIRED UNDER §264.97 AND, TO THE EXTENT POSSIBLE, THE INFORMATION REQUIRED IN (2) ABOVE.

4. A DESCRIPTION OF ANY PLUME OR CONTAMINATION THAT HAS ENTERED THE GROUND WATER FROM A A REGULATED UNIT AT THE TIME THAT THE APPLICATION IS SUBMITTED THAT:

    a. DELINEATES THE EXTENT OF THE PLUME ON THE TOPOGRAPHIC MAP REQUIRED UNDER PART I-B-3;

    b. IDENTIFIES THE CONCENTRATION OF EACH APPENDIX VIII OF PART 261 CONSTITUENT THROUGHOUT THE PLUME OR IDENTIFIES THE MAXIMUM CONCENTRATIONS OF EACH APPENDIX VIII CONSTITUENT IN THE PLUME.

5. DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING THE PROPOSED GROUND WATER MONITORING PROGRAM TO BE IMPLEMENTED TO MEET THE REQUIREMENTS OF §264.97.

6. IF THE PRESENCE OF HAZARDOUS CONSTITUENTS HAS NOT BEEN DETECTED IN THE GROUND WATER AT THE TIME OF PERMIT APPLICATION, THE OWNER OR OPERATOR MUST SUBMIT SUFFICIENT INFORMATION, SUPPORTING DATA, AND ANALYSES TO ESTABLISH A DETECTION MONITORING PROGRAM WHICH MEETS THE REQUIREMENTS OF §264.98. THIS SUBMISSION MUST ADDRESS THE FOLLOWING ITEMS AS SPECIFIED UNDER §264.98:

    a. A PROPOSED LIST OF INDICATOR PARAMETERS, WASTE CONSTITUENTS, OR REACTION PRODUCTS THAT CAN PROVIDE A RELIABLE INDICATION OF THE PRESENCE OF HAZARDOUS CONSTITUENTS IN THE GROUND WATER;

    b. A PROPOSED GROUND WATER MONITORING SYSTEM;

    c. BACKGROUND VALUES FOR EACH PROPOSED MONITORING PARAMETER OR CONSTITUENT, OR PROCEDURES TO CALCULATE SUCH VALUES; AND

d. A DESCRIPTION OF PROPOSED SAMPLING, ANALYSIS AND STATISTICAL COMPARISON PROCEDURES TO BE UTILIZED IN EVALUATING GROUND WATER MONITORING DATA.

7. IF THE PRESENCE OF HAZARDOUS CONSTITUENTS HAS BEEN DETECTED IN THE GROUND WATER AT THE POINT OF COMPLIANCE AT THE TIME OF PERMIT APPLICATION, THE OWNER OR OPERATOR MUST SUMIT SUFFICIENT INFORMATION, SUPPORTING DATA, AND ANALYSES TO ESTABLISH A COMPLIANCE MONITORING PROGRAM WHICH MEETS THE REQUIREMENTS OF §264.99. THE OWNER OR OPERATOR MUST ALSO SUBMIT AN ENGINEERING FEASIBILITY PLAN FOR A CORRECTIVE ACTION PROGRAM NECESSARY TO MEET THE REQUIREMENTS OF §264.100, AND CHAPTER 17-30.18(4) EXCEPT AS PROVIDED IN §264.98(h)(5). TO DEMONSTRATE COMPLIANCE WITH §264.99, THE OWNER OR OPERATOR MUST ADDRESS THE FOLLOWING ITEMS:

   a. A DESCRIPTION OF THE WASTES PREVIOUSLY HANDLED AT THE FACILITY;

   b. A CHARACTERIZATION OF THE CONTAMINATED GROUND WATER, INCLUDING CONCENTRATIONS OF HAZARDOUS CONSTITUENTS;

   c. A LIST OF HAZARDOUS CONSTITUENTS FOR WHICH COMPLIANCE MONITORING WILL BE UNDERTAKEN IN ACCORDANCE WITH §§264.97 AND 264.99;

   d. PROPOSED CONCENTRATION LIMITS FOR EACH HAZARDOUS CONSTITUENT, BASED ON THE CRITERIA SET FORTH IN §264.94(a), INCLUDING A JUSTIFICATION FOR ESTABLISHING ANY ALTERNATE CONCENTRATION LIMITS;

   e. DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING THE PROPOSED GROUND WATER MONITORING SYSTEM, IN ACCORDANCE WITH THE REQUIREMENTS OF §264.97; AND

   f. A DESCRIPTION OF PROPOSED SAMPLING, ANALYSIS AND STATISTICAL COMPARISON PROCEDURES TO BE UTILIZED IN EVALUATING GROUND WATER MONITORING DATA.

8. IF HAZARDOUS CONSTITUENTS HAVE BEEN MEASURED IN THE GROUND WATER WHICH EXCEED THE CONCENTRATION LIMITS ESTABLISHED UNDER §264.94 TABLE 1, OR IF GROUND WATER MONITORING CONDUCTED AT THE TIME OF PERMIT APPLICATION UNDER §§265.90-265.94 AT THE WASTE BOUNDARY INDICATES THE PRESENCE OF HAZARDOUS CONSTITUENTS FROM THE FACILITY IN GROUND WATER OVER BACKGROUND CONCENTRATIONS, THE OWNER OR OPERATOR MUST SUBMIT SUFFICIENT INFORMATION, SUPPORTING DATA, AND ANALYSES TO ESTABLISH A CORRECTIVE ACTION PROGRAM WHICH MEETS THE REQUIREMENTS OF §264.100 AND CHAPTER 17-30.18(4). HOWEVER, AN OWNER OR OPERATOR IS NOT REQUIRED TO SUBMIT INFORMATION TO ESTABLISH A CORRECTIVE ACTION PROGRAM IF HE DEMONSTRATES TO THE DEPARTMENT THAT ALTERNATE CONCENTRATION LIMITS WILL PROTECT HUMAN HEALTH AND THE ENVIRONMENT AFTER CONSIDERING THE CRITERIA LISTED IN §264.94(b). AN OWNER OR OPERATOR WHO IS NOT REQUIRED TO ESTABLISH A CORRECTIVE ACTION PROGRAM FOR THIS REASON MUST INSTEAD SUBMIT SUFFICIENT INFORMATION TO ESTABLISH A COMPLIANCE MONITORING PROGRAM WHICH MEETS THE REQUIREMENTS OF §264.99 AND (6) ABOVE. TO DEMONSTRATE COMPLIANCE WITH §264.100 AND CHAPTER 17-30.18(4), THE OWNER OR OPERATOR MUST ADDRESS, AT A MINIMUM, THE FOLLOWING ITEMS:

   a. A CHARACTERIZATION OF THE CONTAMINATED GROUND WATER, INCLUDING CONCENTRATIONS OF HAZARDOUS CONSTITUENTS;

b. THE CONCENTRATION LIMIT FOR EACH HAZARDOUS CONSTITUENT FOUND IN THE GROUND WATER AS SET FORTH IN §264.94;

c. DETAILED PLANS AND AN ENGINEERING REPORT DESCRIBING THE CORRECTIVE ACTION TO BE TAKEN; AND

d. A DESCRIPTION OF HOW THE GROUND WATER MONITORING PROGRAM WILL ASSESS THE ADEQUACY OF THE CORRECTIVE ACTION.

B. CHAPTERS 17-3 AND 17-4, FAC, REQUIREMENTS

IN ACCORDANCE WITH SECTION 17-30.18(4)(c) HAZARDOUS WASTE FACILITIES WHICH MAY IMPACT THE GROUND WATER MUST ALSO COMPLY WITH THE GROUND WATER PROVISIONS OF CHAPTERS 17-3 AND 17-4. THE DEPARTMENT'S SUPPLEMENTAL GROUND WATER MONITORING FORM (DER FORM 17-1.216(3)) MUST BE COMPLETED AS PART OF THE HAZARDOUS WASTE PERMIT APPLICATION UNLESS THE DEPARTMENT MAKES THE DETERMINATION THAT THE FACILITY'S EXISTING HAZARDOUS WASTE GROUND WATER MONITORING PROGRAM IS IN SUBSTANTIAL COMPLIANCE WITH SECTION 17-4.245(6).

CERTIFICATION

1. OPERATOR

THIS IS TO CERTIFY THAT UNDER PENALTY OF LAW I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ATTACHMENTS AND THAT, BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. FURTHER, I AGREE TO COMPLY WITH THE PROVISIONS OF CHAPTER 403, FLORIDA STATUTES, AND ALL RULES AND REGULATIONS OF THE DEPARTMENT OF ENVIRONMENTAL REGULATION. IT IS UNDERSTOOD THAT THE PERMIT IS ONLY TRANSFERABLE IN ACCORDANCE WITH SECTION 17-30.30, FAC, AND, IF GRANTED A PERMIT, THE DEPARTMENT OF ENVIRONMENTAL REGULATION WILL BE NOTIFIED PRIOR TO THE SALE OR LEGAL TRANSFER OF THE PERMITTED FACILITY.

Rondal G. Chambers

SIGNATURE OF THE OPERATOR OR AUTHORIZED REPRESENTATIVE*

Rondal G. Chambers, Vice President

NAME AND TITLE (PLEASE TYPE OR PRINT)

DATE: 4/2/86 TELEPHONE NO. (305)859-4441

*ATTACH A LETTER OF AUTHORIZATION

2. FACILITY OWNER

THIS IS TO CERTIFY THAT I UNDERSTAND THIS APPLICATION IS SUBMITTED FOR THE PURPOSE OF OBTAINING A PERMIT TO CONSTRUCT, OPERATE, OR CLOSE A HAZARDOUS WASTE MANAGEMENT FACILITY ON THE PROPERTY AS DESCRIBED. AS OWNER OF THE FACILITY, I UNDERSTAND FULLY THAT THE FACILITY OPERATOR AND I ARE JOINTLY RESPONSIBLE FOR COMPLIANCE WITH THE PROVISIONS OF CHAPTER 403, FLORIDA STATUTES, AND ALL RULES AND REGULATIONS OF THE DEPARTMENT OF ENVIRONMENTAL REGULATION.

Ann L. Sullivan

SIGNATURE OF THE FACILITY OWNER OR AUTHORIZED REPRESENTATIVE*

Thomas P. and Ann Sullivan, President

NAME AND TITLE (PLEASE TYPE OR PRINT)

DATE: 3/31/86 TELEPHONE NO. (313) 282-9250

*ATTACH A LETTER OF AUTHORIZATION

3. LAND OWNER

THIS IS TO CERTIFY THAT I, AS LAND OWNER, UNDERSTAND THAT THIS APPLICATION IS SUBMITTED FOR THE PURPOSE OF OBTAINING A PERMIT TO CONSTRUCT, OPERATE, OR CLOSE A HAZARDOUS WASTE MANAGEMENT FACILITY ON THE PROPERTY AS DESCRIBED. FOR HAZARDOUS WASTE DISPOSAL FACILITIES, I FURTHER UNDERSTAND THAT I AM RESPONSIBLE FOR PROVIDING THE NOTICE IN THE DEED TO THE PROPERTY REQUIRED BY 40 CFR §264.120 AND §265.120, AS ADOPTED BY REFERENCE IN CHAPTER 17-30, FAC.

Ann L. Sullivan

SIGNATURE OF THE LAND OWNER OR AUTHORIZED REPRESENTATIVE*

Thomas P. and Ann Sullivan, President

NAME AND TITLE (PLEASE TYPE OR PRINT)

DATE: 3/31/86 TELEPHONE NO. (313) 282-9250

*ATTACH A LETTER OF AUTHORIZATION

4. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (WHERE REQUIRED BY CHAPTER 471, F.S.)

THIS IS TO CERTIFY THAT THE ENGINEERING FEATURES OF THIS HAZARDOUS WASTE MANAGEMENT FACILITY HAVE BEEN DESIGNED/EXAMINED BY ME AND FOUND TO CONFORM TO ENGINEERING PRINCIPLES APPLICABLE TO SUCH FACILITIES. IN MY PROFESSIONAL JUDGMENT, THIS FACILITY, WHEN PROPERLY CONSTRUCTED, MAINTAINED AND OPERATED, OR CLOSED, WILL COMPL. WITH ALL APPLICABLE STATUTES OF THE STATE OF FLORIDA AND RULES OF THE DEPARTMENT OF ENVIRONMENTAL REGULATION.

SIGNATURE MAILING ADDRESS Cross/Tessitore & Assoc.

NAME Frank L. Cross, Jr., P.E. (PLEASE TYPE) 4759 S. Conway Rd., Suite D STREET OR P.O. BOX

Orlando CITY Flroida STATE 32812 ZIP

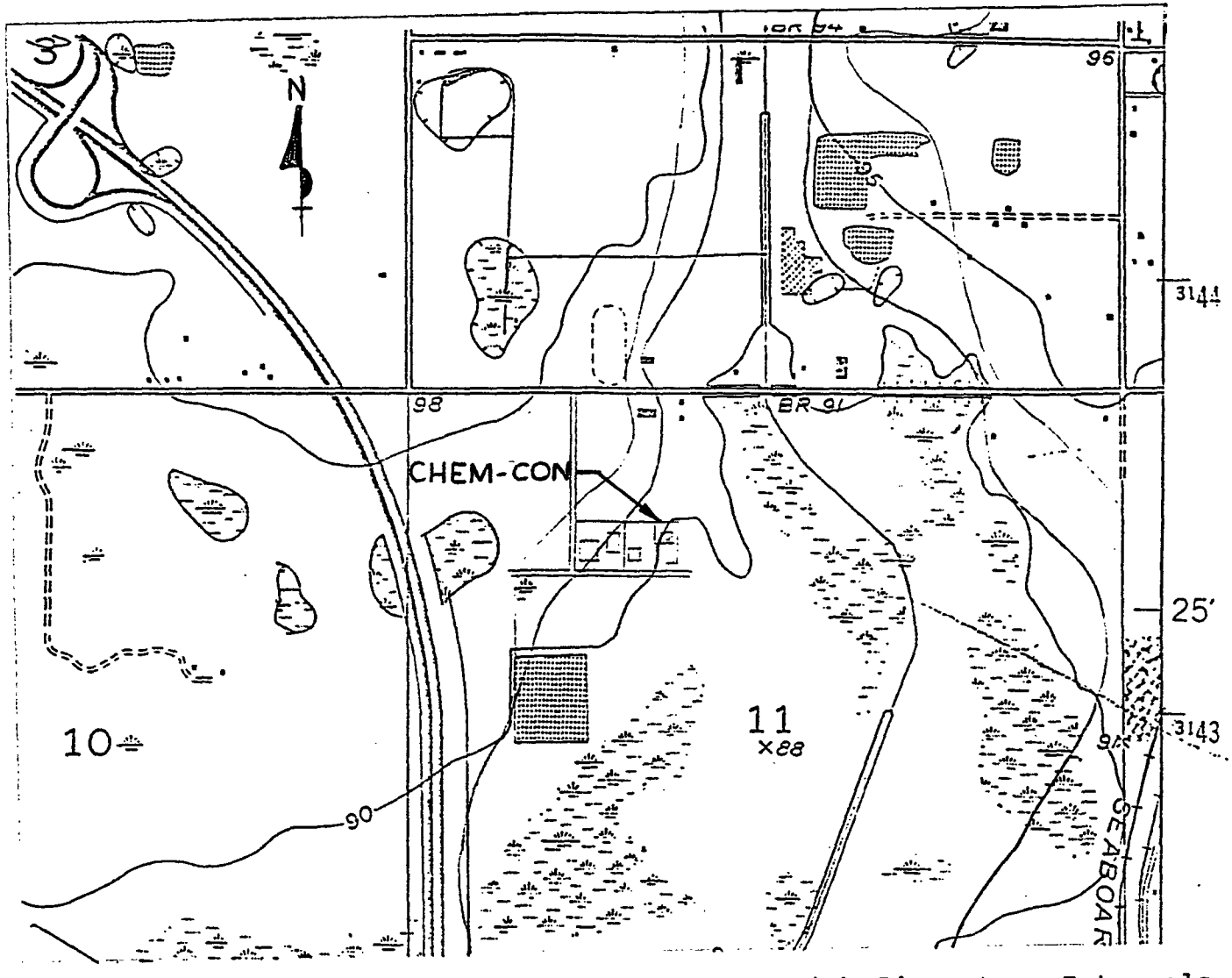
(305) 851-1484 TELEPHONE NO. DATE

FRANK L. CROSS, JR. CERTIFICATE No. 7916 STATE OF FLORIDA REGISTERED ENGINEER

FLORIDA REGISTRATION NUMBER 7916

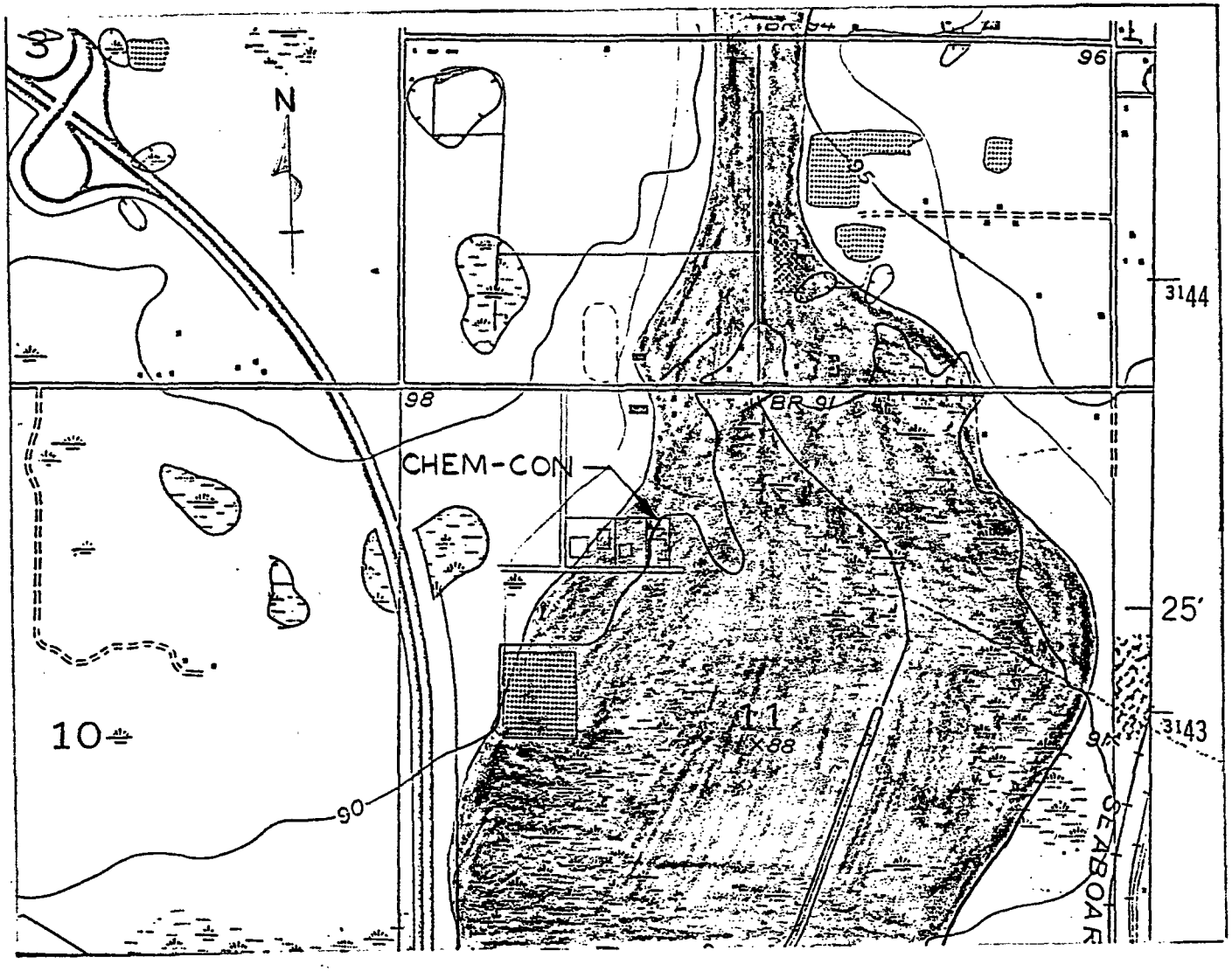
(Please Affix Seal)

ATTACHMENT 1



SCALE: 1"=1400'
MAP DATE: 1980

Facilty Map with 5' Contour Intervals of Elevation (ft-MSL)



100-yr floodplain

500-yr floodplain

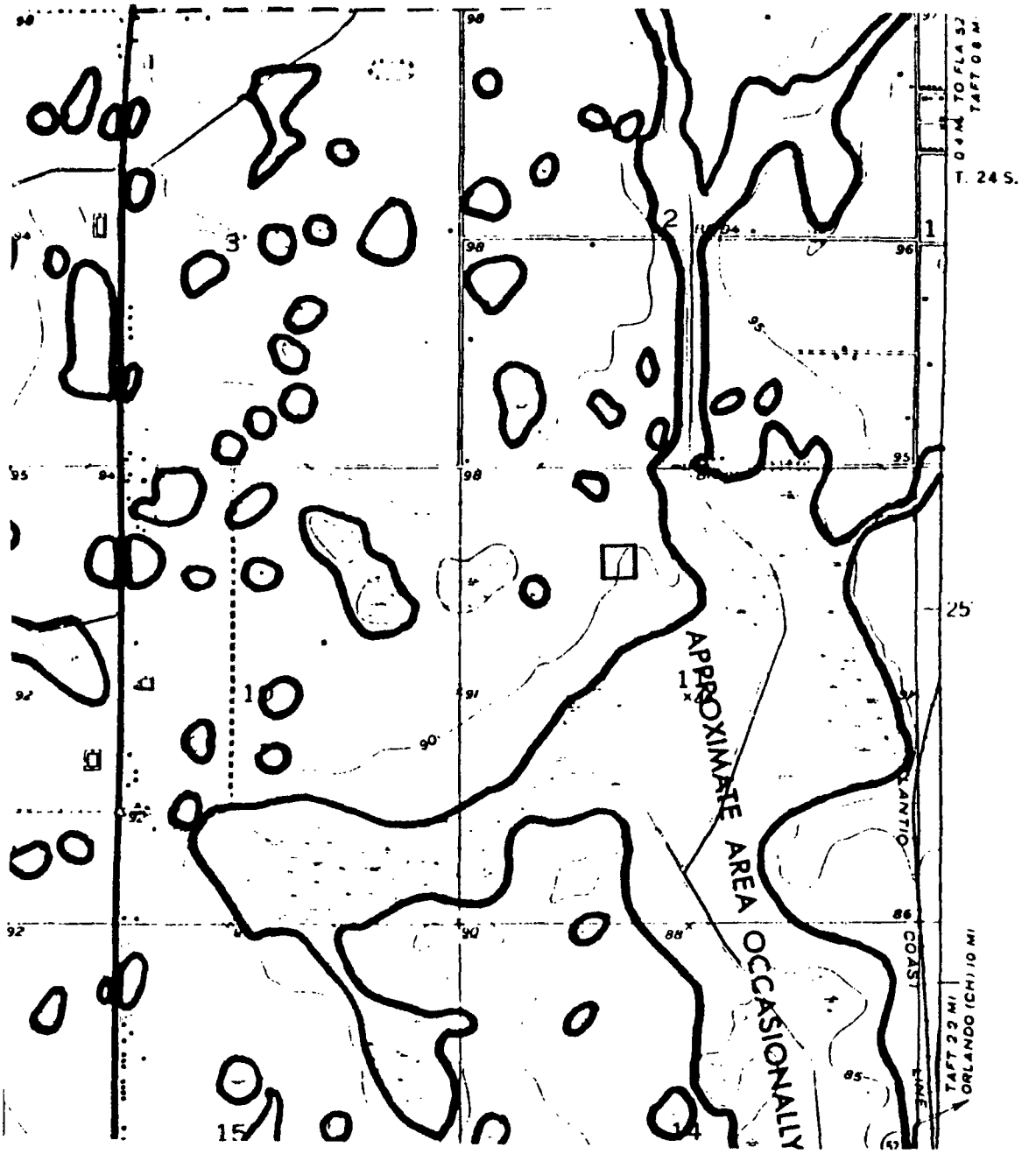
SCALE: 1"=1400'
MAP DATE: 1980

Facility Map Showing 100-yr and 500-yr Floodplain

ITEM 1.

According to the South Florida Water Management District, there are no drinking wells within 1/4 mile of the facility. There are no streams, springs, or lakes within 1/4 mile of the facility (See U.S.G.S. Location Map).

Revision 1
7/11/86



SCALE 1:24,000

U.S.G.S. MAP
Lake Jessamine, Florida

CHEMCON FACILITY LOCATION (SECTION 11)

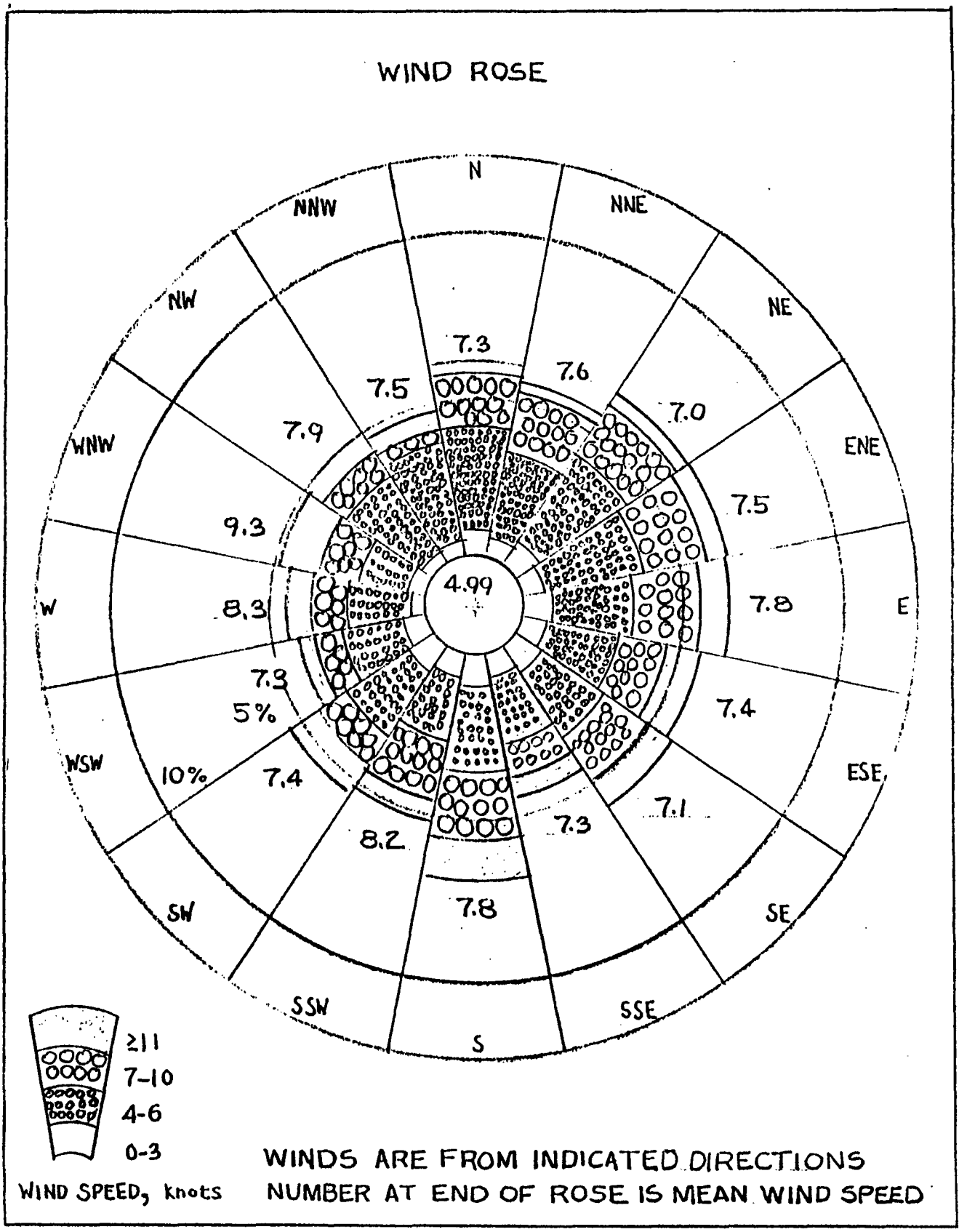
Revision 1
7/11/86

49B

ITEM 2.

There are no injection wells, intake or discharge structures within 1 mile of the facility property boundary.

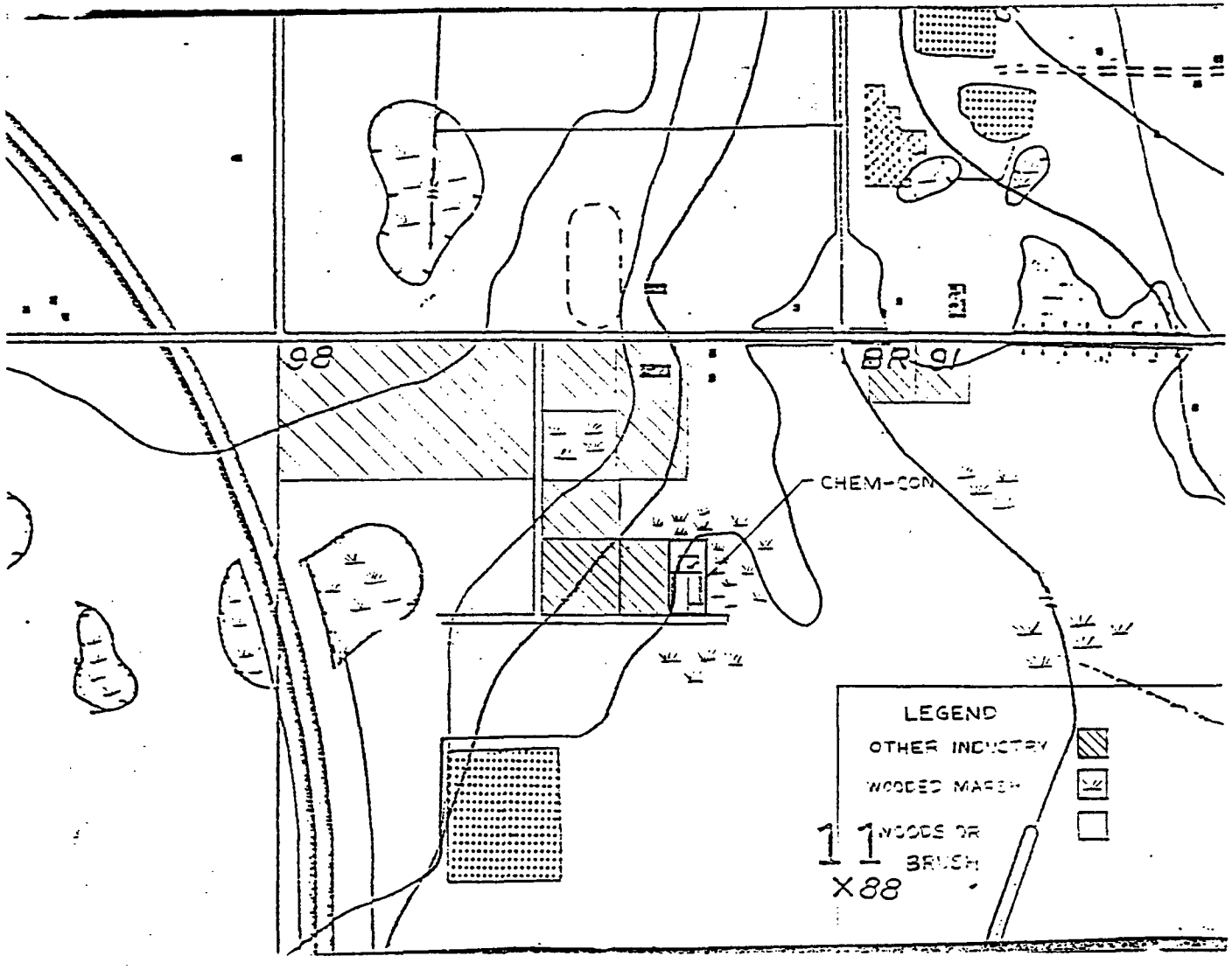
Revision 1
7/11/86 49C



ANNUAL WIND ROSE FOR ORLANDO, FLORIDA
1948-1978

SOURCE: NATIONAL WEATHER SERVICE AT HERNDON AND MCCOY AIRPORT

ATTACHMENT 2



SCALE: 1"=900'
MAP DATE: 1980

ChemCon Facilty and Surrounding Land Use

ATTACHMENT 3

PART I/SECTION D/ITEM 2A.

FACILITY DESCRIPTION

General Description

Chemical Conservation Corporation (ChemCon), has maintained a hazardous waste transportation facility in Orange County since 1981. In January 1985, the operation was relocated to its present site at:

653 Rocket Boulevard
Orlando, Florida 32824

ChemCon's transportation service moves wastes or virgin commodities in bulk or drum. Upon arrival of the truck at the pick-up site, material is loaded and transported immediately to the ChemCon facility. There it is either stored on-site for no more than 10 days or transported immediately to its destination.

The 1.2-acre site is located in Regency Industrial Park in Orlando, approximately 0.3 miles east of the Florida Turnpike and 4 miles north of the Osceola County line.

The contact and party responsible for the hazardous waste management activities at ChemCon is:

Rondal G. Chambers
Vice President
(305) 859-4441.

PART I/SECTION D/ITEM 2B.

WASTE CHARACTERISTICS

Chemical and Physical Analyses

The following is a list of all chemicals accepted for transportation and/or temporary storage by ChemCon:

EPA WASTE NO.	HAZARDOUS WASTE	HAZARD CODE
261.31	Hazardous waste from nonspecific sources.	
Generic		
F001	The spent halogenated solvents used in degreasing, trichloroethylene, tetrachloroethylene, methylene chloride, 1.1.1. trichloroethane, carbon tetrachloride, and the chlorinated flurocarbons; and sludges from the recovery of these solvents in degreasing operations.	T
F002	The spent halogenated solvents, tetrachloroethylene, methylene chloride, trichloroethylene, 1.1.1. trichloroethane, chlorobenzene, 1.1.2 trichloro 1.2.2. trifluroethane, o-dichlorobenzene, trichlorofluoromethane and the still bottoms from the recovery of these solvents.	T
F003	The spent non-halogenated solvents, xylene, acetone, ethyl acetate, ethylbenzene, ethyl ether, n-butyl alcohol, cyclohexanone, and the still bottoms from the recovery of these solvents.	I
F005	The spent non-halogenated solvents, methanol, toluene, methyl ethyl ketone, methyl isobutyl ketone, carbon disulfide, isobutanol, pyridine and the still bottoms from the recovery of these solvents.	I,T
F006	Waste water treatment sludges from electroplating operations	T
F008	Plating bath sludges from the bottom of plating baths from electroplating operations	R,T
F009	Spent stripping and cleaning bath solutions from electroplating operations.	R,T
261.32	Hazardous waste from specific sources	
Petroleum Refining		
K048	Dissolved air flotation (DAF float from the petroleum refining industry.	T
K049	Slop oil emulsion solids from the petroleum refining idnustry.	T

Exhibit I

EPA WASTE NO.	HAZARDOUS WASTE	HAZARD CODE
Petroleum Refining		
K050	Heat exchanger bundle cleaning sludge from the petroleum refining industry.	T
K051	API separator sludge from the petroleum refining industry.	T
K052	Tank bottoms (leaded) from the petroleum refining industry.	T
Iron & Steel		
K061	Emission control dust/sludge from the electric furance production of steel	T
K062	Spent pickle liquor from steel finishing operations	C,T
K086	Solvent washes and sludges, caustic washes and sludges, or water washese and sludges from cleaning tubs and equipment used in the fomulation of ink, from pigments, driers, soaps, and stablizers containing chromium and lead	

D001	Ignitable Waste - Flash point less than 140°F	
D002	Corrosive Waste - ph lower than 2 and greater than 12.5	

	EP TOXIC WASTES	Extract Concentration (Milligrams per liter)
D004	Arsenic	5.0
D005	Barium	100.0
D006	Cadmium	1.0
D007	Chromium	5.0
D008	Lead	5.0
D009	Mercury	0.2
D010	Selenium	1.0
D011	Silver	5.0
MICHIGAN HAZARDOUS WASTE		
001D	Copper	100
002D	Cyanide (s)	20
003D	Zinc	500.0

Exhibit I

PART I/SECTION D/ITEM 2C.

The quantity of materials handled by ChemCon currently are listed below:

Type of Material	Quantity Handled Annually
Corrosive materials	400,000 gal.
Flammable liquids	350,000 gal.
Sludges - ORME	700,000 lbs.
Chlorinated solvents	220,000 gal.

PART I/SECTION D/ITEM 2D.

The maximum inventory of drums in storage at any given time at the facility is not expected to exceed 800 drums. The existing facilities at the Chemcial Conservation Corporation consist of a 2200 SF flammable liquids container storage area and a 2850 SF corrosive liquids container storage area separated drain which leads to a 1200 gal. storage tank for spill containment and washdown. The design and specifications for the container storage facility were certified by a Registered Professional Engineer.

Specific information provided in this section will follow a format required for containers storing free liquids.

There is approximately 5,000 SF of storage space of which about 1160 SF is aisle space for fork lift access to each area, and 510 SF is an office and work area. The remaining 3,450 SF area is actual storage space which is divided into two separate areas described above, separated by a concrete curb and cross-over ramp.

The combined drum capacity of the storage area is approximately 550 drums stacked in one layer. The actual number of drums stored at any one time will vary. Volume produced by generators is seldom constant.

PART I/SECTION D/ITEM 3

Since this is a transfer facility only, drums containing hazardous wastes are never opened. Thus, the analyses of the wastes are performed off-site, and pertinent information is then recorded on the "Generator Waste Analysis Form" at ChemCon's request. These forms are kept on file and updated as necessary. (Item 4)

Item 2(B) lists and describes all wastes currently handled by ChemCon. The "Hazard Code" for each waste provides the necessary information for storing the waste.

PART I/SECTION D/ITEM 4.

Generators of all hazardous wastes accepted for storage and transportation by ChemCon are required to submit prior to acceptance a complete chemical and physical analysis of the waste. A sample "Generator Waste Analysis Form" is shown on the following page.

GENERATOR WASTE ANALYSIS FORM

LOG NO._____

WASTE GENERATOR GENERATOR NO._____

Name:_____

Address:_____

City:_____State_____Zip_____

Phone:_____Date_____

Contact Person:_____

Signature:_____

WASTE HAULER HAULER NO. FLD 980559728

Co. Name: Chemical Conservation Corporation

Address: 653 Rocket Boulevard

City: Orlando State Fla. Zip 32824

DISPOSAL METHOD & FACILITY TO BE USED

___Incineration ___Landfill ___Reclaimed

___Other(explain):_____

FACILITY No:_____ Phone:_____

Name:_____

Address:_____

City:_____State_____Zip_____

PHYSICAL STATE @ 25°C (Circle One)

Solid: Dusting hazard if containers are opened?_____

Liquid/Sludges: _____% Solid _____pH

Waste can be pumped? _____ Poured?_____

Liquid/Solid Phases: _____% Solid

% Free flowing liquid layer

Gases: Pressure of Container _____PSIG

___ EP Leachate extraction attached.

___ Flammable: _____Flash Point. ___pH

___ Chemically Reactive _____

___ Toxic ___Corrosive ___Irritant

___ Odor ___Explosive ___Infectious

___ Volatility (If greater than Acetone)

___ OTHER _____

GENERAL DESCRIPTION OF WASTE AND PROCESS GENERATING WASTE

_____

_____

_____

VOLUME OF WASTE MATERIAL & CONTAINMENT

_____Gallons _____Cubic Yards. Container:

_____Bulk. Other _____

HAULED ___ Times per ___Week ___Month

___ Year ___ Only hauled once.

CHEM-CON CORP.

653 Rocket Boulevard
Orlando, Florida 32824

1-305-859-4441

IDENTIFY MAJOR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor components must add up to 100%.

COMPOUND OR ELEMENT	CONCENTRATION

MINOR COMPONENTS: Concentration in mg/kg, ppm or mg/l of waste content. (Element and/or Compound).

INORGANIC METALS:

1. _____Lead
2. _____Zinc
3. _____Nickel
4. _____Copper
5. _____Mercury
6. _____Beryllium
7. _____Cadmium
8. _____Trivalent Chromium
9. _____Hexavalent Chromium

INORGANIC NON-METALS:

10. _____Chlorine
11. _____Bromine
12. _____Arsenic
13. _____Phosphorus
14. _____Sulfur
15. _____Cyanide
16. _____Noncombustible Ash

DOES THE WASTE MATERIAL CONTAIN ANY OF THE FOLLOWING:

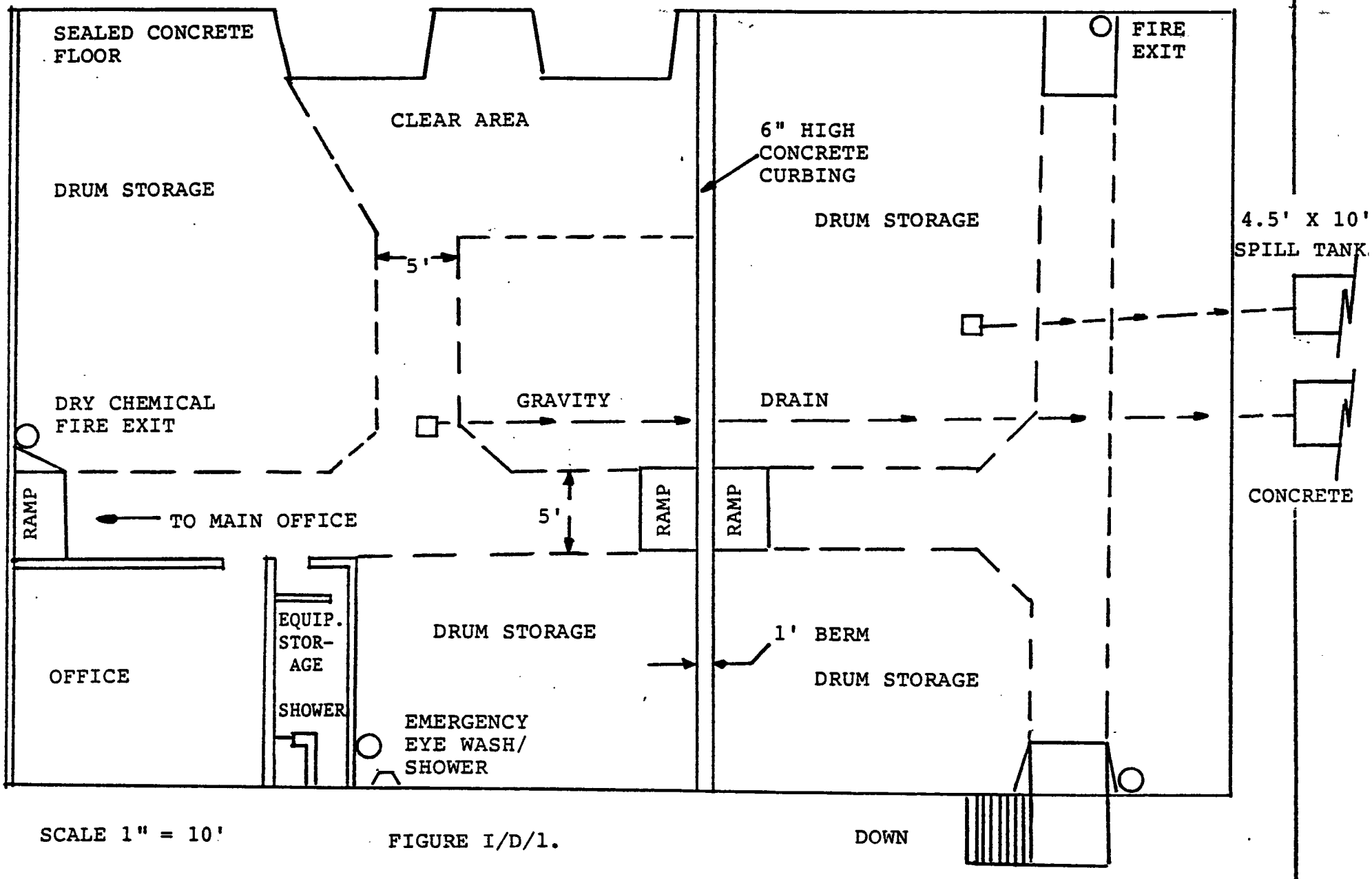
Class Of Compound	Yes	No
17. Halogenated Aromatics (e.g. PCB, PBB)	___	___
18. Other Halogenated Organics	___	___
19. Aromatic Amines	___	___
20. Pesticides	___	___
21. Aromatic Ureas or Thioureas	___	___
22. Cyclic Nitrogen (Toxic) (e.g. Pyridine)	___	___
23. Phenols, to include nitro & halogenated phenols & salt	___	___
24. Quinones	___	___
25. Phosphorus Compounds (e.g. Phosphates)	___	___
26. Polycyclic Organics	___	___
27. Asbestos	___	___
28. Any other material listed on MI. Critical Materials Reg.	___	___

NOTE:

State what methods were utilized to derive the data for the Major and Minor Compounds (Analysis, Material Balance, etc...).

INDICATE THE SPECIFIC NAME AND CONCENTRATION FOR THE COMPOUND(S) IN EACH CLASS LISTED ABOVE (17-28) THAT HAVE A CONCENTRATION LESS THAN 1%.

Compound	Concentration (mg/kg)



SCALE 1" = 10'

FIGURE I/D/1.

CROSS/TESSITORE & ASSOC., P.A.

ENVIRONMENTAL ENGINEERS ORLANDO, FLORIDA

PART I/SECTION D/ITEM 5

Traffic Patterns

Hazardous waste material in drum containers arrives at the facility on trucks. Drums are loaded and unloaded via forklifts and stored temporarily before shipping to their final destination.

Figure I/D/2 shows the traffic pattern on-site. Trucks are contained within the loading and unloading area. Traffic flow to the site from U. S. 17-92 moves east along Taft-Vineland Road. A right-hand turn is made at General Drive, and after a distance of approximately 1/2 mile, a left-hand turn is made at Rocket Boulevard. The ChemCon facility is on the left about 1500 feet from the intersection. This is shown in Figure I/D/3.

ITEM 3.

Access to the ChemCon facility is obtained via State Road 441 and Taft Vineland. Within Regency Industrial Park, access roads to ChemCon are General Drive and Rocket Boulevard. All roadways in Regency Industrial Park were designed to meet Orange County design criteria for industrial roadways. These are as follows:

* Sub-base: 12" compacted to 98%
* Base: 10" of limerock or
  8" of soil cement
* Surface: 1.5" thick.

Design criteria for the parking lot and loading/unloading area are shown on the enclosed drawings:

* Site Plan
* Paving and Drainage.

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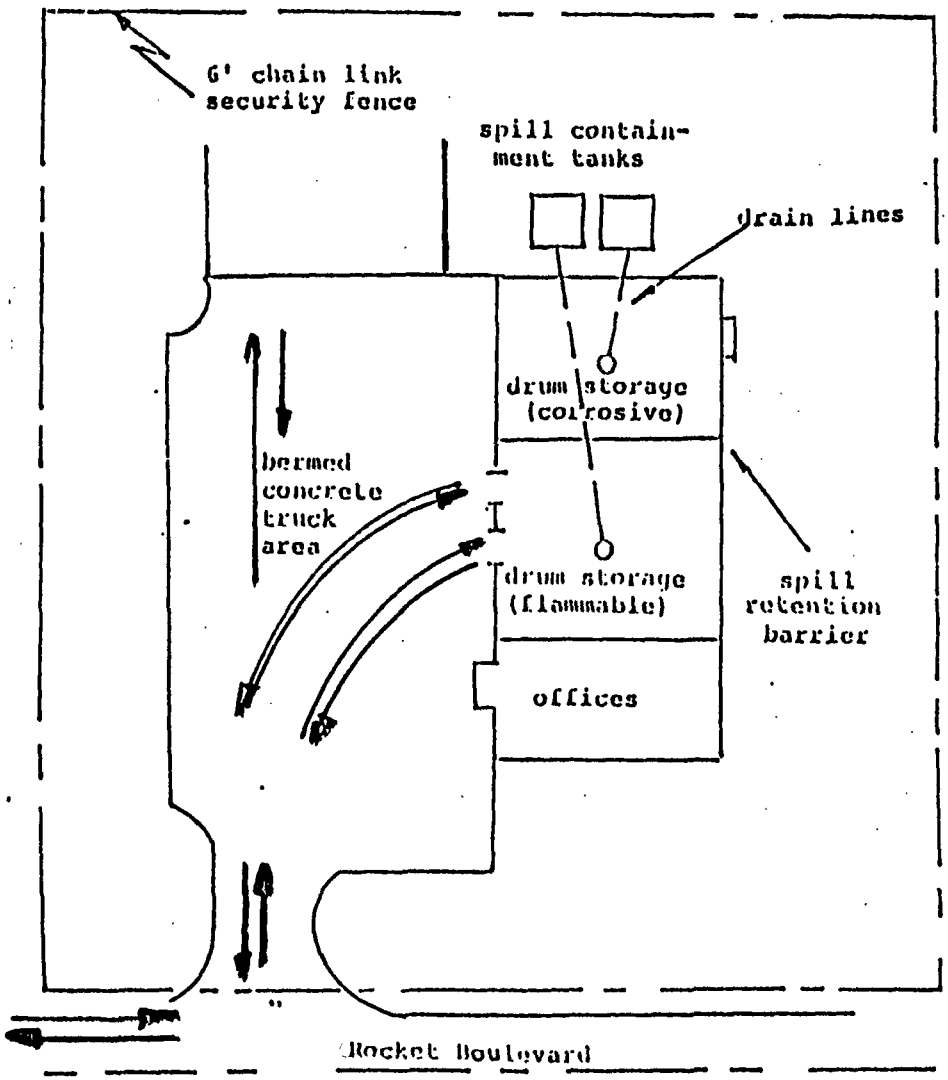

Figure I/D/2. Traffic Flow On Site

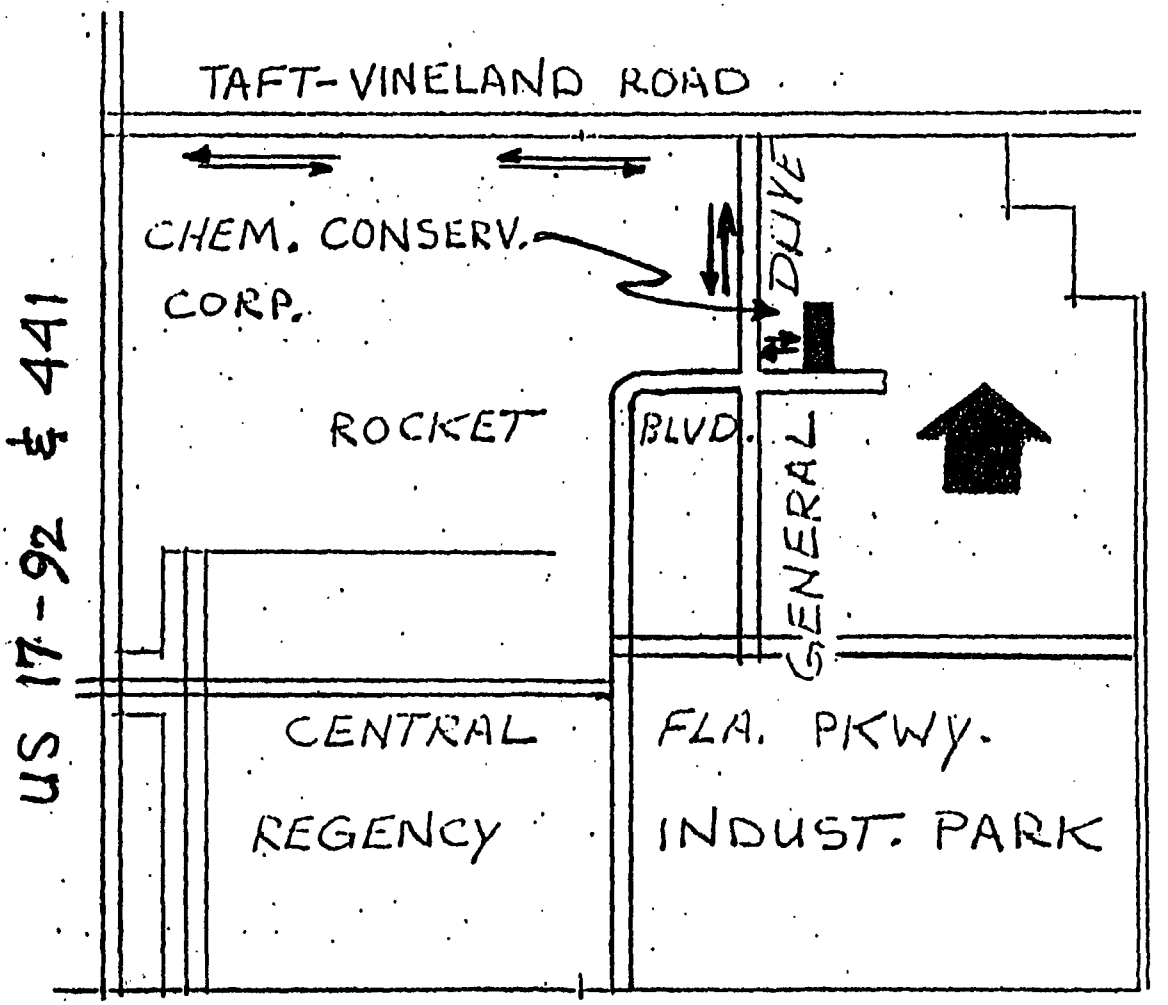

Figure I/D/3. Traffic Flow To Site

ITEM 4.

MANIFEST SYSTEM

As drummed wastes arrive at the facility with accompanying manifests, an authorized ChemCon representative:

(1) Signs and dates each copy of the of the manifest to certify receipt;

(2) Notes on the manifest any significant discrepancies in that manifest (i.e., differences in quantity or type of hazardous wastes designated). If a discrepancy is discovered, the waste generator and/or transporter are contacted to attempt to reconcile the discrepancy. If it is not resolved within 15 days after the waste is received, then a letter describing the discrepancy, attempts to resolve it, and a copy of the manifest are sent to the Regional Administrator.

(3) Immediately gives the transporter at least one copy of the signed manifest;

(4) Within 30 days after the delivery, sends a copy of the manifest to the generator; and

(5) Retains at the facility a copy of each manifest for at least three years from the date of delivery.

Unmanifested wastes are not accepted by ChemCon.

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RECORD KEEPING

ChemCon maintains an operating record at the facility which includes the following information:

(1) Description and quantity of each waste received and the dates of storage;

(2) The location and quantity of each waste stored and accompanying manifest document numbers;

(3) Results of waste analyses performed when needed;

(4) Summary reports of all incidents requiring implementation of the Contingency Plan;

(5) Records and results of regular inspections (kept for three years);

(6) Notices to generators that ChemCon will accept wastes and is appropriately authorized to do so;

(7) All closure cost estimates.

These records are made available at all times for inspection by regulatory agency representatives.

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REPORTING Annual

(1) Biennial Report

FDER

A biennial report will be submitted to the Regional Administrator by March 1 of each even-numbered year on EPA Form 8700-13B. The report includes the following information for the previous calendar year:

- EPA Identification Number
- Name and address of facility
- Calendar year covered by report
- EPA ID number of each generator from which facility received hazardous wastes during the year
- Description and quantity of each waste received during the year listed by the EPA ID number of each generator
- The most recent closure cost estimate
- Certification signed by the owner or operator or authorized representative of the facility

(2) Releases, Fires, and Explosions

Within 15 days after an incident, ChemCon will submit a written report on the incident to the Regional Administrator. The report will include the following:

- Name, address, and telephone number of owner or operator
- Name, address, and telephone number of facility
- Date, time, and type of incident
- Name and quantity of materials involved

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(2) Releases, Fires, and Explosions (continued)

- Extent of injuries, if any
- Assessment of actual or potential hazards to human health or the environment (where applicable)
- Estimated quantity and disposition of recovered materials.

(3) Certification of Closure

When closure is completed, the owner or operator will submit to the ~~Regional Administrator~~ FDER certification by the owner/operator and an independent registered Professional Engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

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ATTACHMENT 4

PART I/SECTION E/ITEM 1

PROCEDURES TO PREVENT HAZARDS

Security

Unknowing entry to the active portion of the facility is prevented, and unauthorized entry is minimized by a six feet chain link fence which completely encloses this area. A single security gate at the only roadway access to the property controls all entry. The gate is supervised during operating hours and locked otherwise.

Detection devices on all entries to the building are linked to the Orange County Sheriff's Department, insuring immediate response to illegal intrusion. A warning sign which is legible from a distance of 25 feet is posted at the entrance to the facility. The sign bears the legend "Danger-Unauthorized Personnel Keep Out". Also, "No Smoking" signs which are legible for a distance of 25 feet have been placed in the container storage area.

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~~June 7, 1989~~
9/15/89

PART I/SECTION D/ITEM 2A.

FACILITY DESCRIPTION

General Description

Chemical Conservation Corporation (ChemCon), has maintained a hazardous waste transportation facility in Orange County since 1981. In January 1985, the operation was relocated to its present site at:

653 Rocket Boulevard
Orlando, Florida 32824

ChemCon's transportation service moves wastes or virgin commodities in bulk or drum. Upon arrival of the truck at the pick-up site, material is loaded and transported immediately to the ChemCon facility. There it is either stored on-site for no more than 10 days or transported immediately to its destination.

The 1.2-acre site is located in Regency Industrial Park in Orlando, approximately 0.3 miles east of the Florida Turnpike and 4 miles north of the Osceola County line.

The contact and party responsible for the hazardous waste management activities at ChemCon is:

William F. Labadie
Vice President

(407) 859-4441

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CONTINGENCY PLAN

General Information

This Contingency Plan is prepared for Chemical Conservation Corporation of 653 Rocket Boulevard, Orlando, Florida 32824. The Chemical Conservation Corporation (herinafter referred to as ChemCon) is presently a transfer and storage facility for hazardous waste produced at over 350 separate sources in Florida.

The Vice President in charge of operations at ChemCon's Orlando Facility is William F. Labadie, and he can be reached at ChemCon at 407/859-4441. After business hours during the week, he can be reached at 6312 Masters Boulevard in Orlando, Florida at 407/876-1219 and during the weekend at 2025 SE St. Lucie Boulevard in Stuart, Florida at 407/283-4853.

EMERGENCY COORDINATORS

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

NAME	TITLE	HOME ADDRESS	WORK PHONE	HOME PHONE
William Labadie	Vice President	6312 Masters Blvd.. Orlando, Florida 32819 or 2025 SE St. Lucie Blvd. Stuart, Florida 34996	407/859-4441	407/876-1219 407/283-4853
Brian Smith	Terminal Manager	1813 B Michigan Ave. Kissimmee, Florida 34744		407/846-1256

If an emergency situation develops at the facility, the discoverer should contact an emergency coordinator listed above. William Labadie, the primary emergency coordinator, should be contacted first. If he is not available, the others should be called in the order listed.

The primary emergency coordinator and his alternates have the authority to commit all resources of the company in the event of an emergency. The following is a list of organizations that could possibly be contacted by the emergency coordinator in the event of an emergency:

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EMERGENCY	ORGANIZATION	EMERGENCY NO.
INJURY	AMBULANCE	911
	ORLANDO REGIONAL MED CENTER	841-5111
	POISON CONTROL CENTER	841-5222
FIRE/ EXPLOSION	ORANGE COUNTY FIRE DEPT.	911 OR 677-7646
	ORANGE COUNTY SHERIFF DEPT.	911
HAZARDOUS MATERIAL SPILL OR RELEASE	ORANGE COUNTY FIRE DEPT.	911 OR 677-7646
	ORANGE COUNTY EMERGENCY MANAGEMENT	678-7600
	ORANGE COUNTY ENVIRONMENTAL PROTECTION	836-7400
NATURAL DIASTER	ORANGE COUNTY EMERGENCY MANAGEMENT	678-7600
POTENTIAL FLOOD	U.S. ARMY CORPS OF ENGINEERS	648-6331
ALL OF THE ABOVE	ORANGE COUNTY EMERGENCY SERVICES	678-7600

Warehouse Personnel

Warehouse personnel report and work under the direction of Mr. Brian Smith. Warehouse personnel load and unload shipments of hazardous waste as well as segregate waste awaiting shipment in the warehouse.

Truck Drivers

Chem-Con drivers load their vehicles from the various generators throughout the area, making sure that proper DOT shipping names, EPA waste codes, proper manifesting, labeling, and drum inspection are all in compliance with Federal State and local regulations. Our drivers are well trained to use extreme caution in handling and transporting waste. All drivers are trained to handle an accidental spill, leak from our vehicles, as well as emergency spill response. Truck drivers report to Mr. Brian Smith

Revision #1
June 6, 1991

TRUCKING PERSONNEL

Michael Avery

Steve Bryant

Gary G. Cooper

Russell Devilbiss

David Henry

Michael Iannacone

Stephen MacDonald

Robert McPherson

Ronald Moore

Russell Payne

Manuel Reyna

Dennis Mike Stoops

Gale Tranum

Danny Woods

WAREHOUSE PERSONNEL

Sean Mallory

R3054

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AGREEMENTS WITH ORANGE COUNTY SHERIFF AND FIRE DEPARTMENTS, ORLANDO REGIONAL MEDICAL CENTER, EMERGENCY RESPONSE TEAM

Sheriff's Department

The Orange County Sheriff's Department is available to direct traffic, handle crowds, and help provide security services in cooperation with the Security, Safety, and Plant Protection Coordinator when necessary. The Department will receive a copy of the Hazardous Wastes 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 will receive a copy of the Hazardous Wastes Contingency Plan.

Hospital

The Orlando Regional Medical Center is available to provide medical service in addition to the services that can be provided by the plant physician and nurse. The hospital will receive a copy of the Hazardous Wastes Contingency Plan.

Emergency Response Team

The Orange County Civil Defense Organization will be familiar with this plan and is available to provide 24-hour, 7 days per week backup service in case of an emergency in the Chemical Storage Facility. The organization will have a copy of the Hazardous Wastes Contingency Plan.

Implementation of Contingency

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 section will provide guidance to the emergency coordinators in making decisions by providing explicit instructions to be carried out in the event of an emergency.

ITEM 6.

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.

The facility employs a warning system with a specific alarm signal to initiate evacuation of all plant areas. Total plant evacuation is initiated only by an 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 applicable employees are familiar with alarm box locations.

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

1. The signal for plant evacuation will be activated.
2. 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.
3. ALL personnel, visitors, and contractors will immediately leave through the exit gate to gather at the rally point.

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4. 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.

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

6. The appointed rally point is located at the corner of Rocket Boulevard and General Drive (approx. 1/2 block from building). Immediately upon exit, the highest ranking supervisor will compile a list of all personnel at the rally point.

7. 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.

8. 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.

9. A final tally of persons will be made by the Emergency Coordinator.

10. No attempt to find persons not accounted for will involve endangering lives of others by reentry into emergency areas.

11. Reentry into 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.

12. 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 they are seeing. 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.

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

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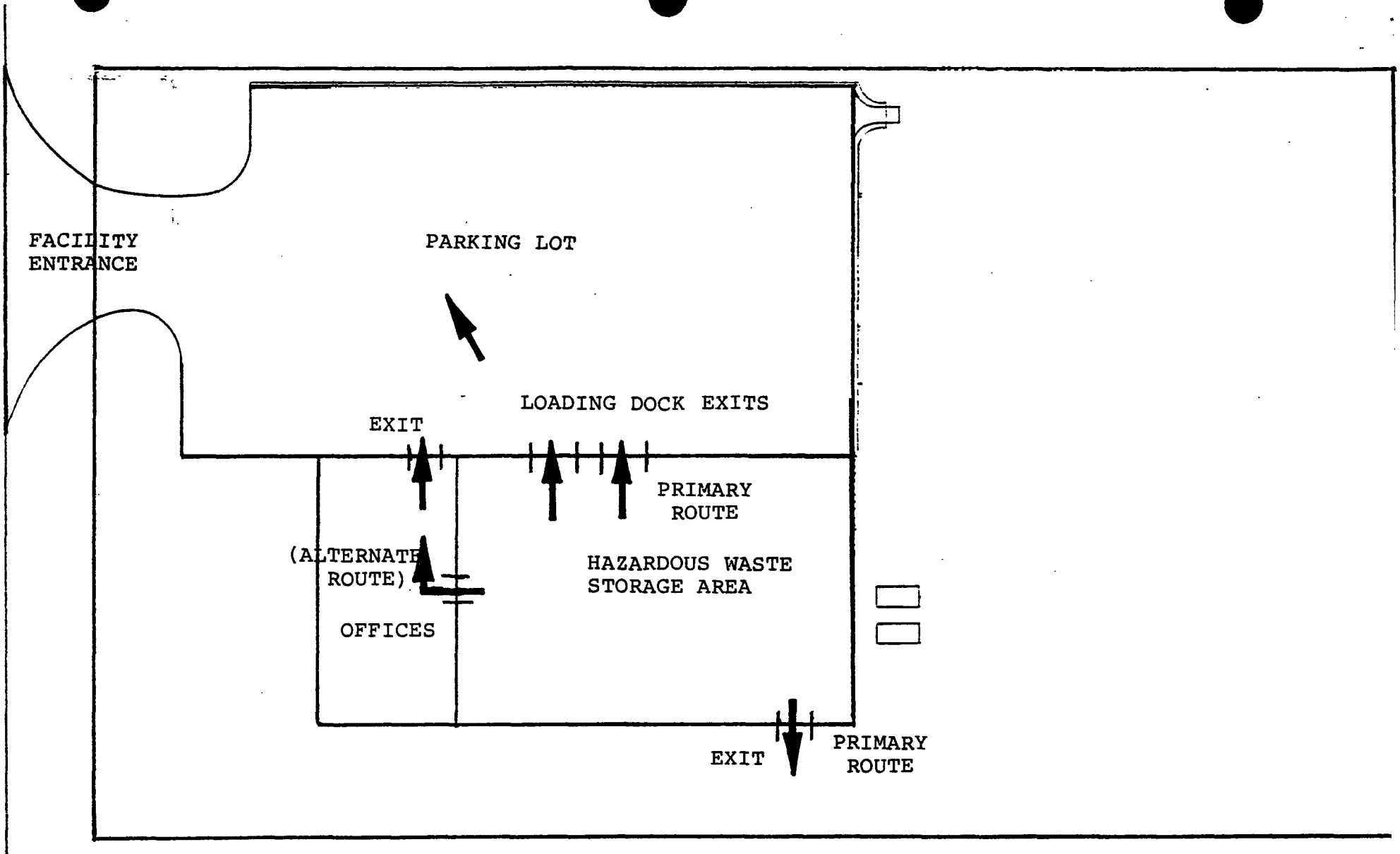

EVACUATION ROUTES AND RALLY POINT

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EMERGENCY PROCEDURES IN RESPONSE TO SPILLS, FIRES, EXPLOSIONS, AND OTHER INCIDENTS THAT WOULD RELEASE HAZARDOUS WASTE TO THE AIR, SOIL, OR SURFACE WATER

Upon being notified by the facilities personnel or County officials of a hazardous waste release, the Emergency Coordinator 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. Notify the Orange County Civil Defense Fund and the Florida Bureau of Disaster Prevention (904-488-1320) if human health or the environment may be threatened outside the facility. This determination for the need of notification shall be made with the knowledge of the above assessment of actual conditions.

6. Seek assistance from the Orange County Sheriff's Department, Fire Department and/or Orlando Regional Medical Center.

7. 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.

8. 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.

Exhibit IV

9. Ensure that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed.

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, Florida DER, and appropriate state and local authorities that the cleanup has been completed before operations are resumed in the facility.

12. Submit a written report on the incident to the Secretary, Florida DER, within 15 days after the incident and identify such incidents in the facility operating record.

13. Disseminate appropriate information to public via local news media.

14. Provide personnel for mechanical and electrical repairs in cooperation with equipment suppliers or local maintenance services.

Exhibit IV

ITEM 5.

RESPONSE TO SPILLS

In the unlikely event of a spill (containers are never opened at ChemCon's facility), clean-up personnel will:

(1) Make sure all unnecessary persons are removed from the hazard area.

(2) Put on protective clothing and equipment as applicable.

(3) If flammable waste is involved, remove all ignition sources, and use spark and explosion proof equipment and clothing in containment and clean-up.

(4) If possible, try to stop leaks. Special materials will be kept on hand for temporary repairs until waste material can be transferred to a waste recovery drum.

(5) Remove all surrounding materials that could be especially reactive with materials in the waste. Determine the major components in the waste at the time of the spill.

(6) If necessary, use absorbent pads, earth, sand, sandbags, and other inert materials to contain and manually clean up a spill. Most spills contained within the diked areas can be pumped back into the appropriate drum, or where leaks are involved, into a waste recovery drum.

(7) Place all containment and clean-up materials in clearly marked drums for disposal as hazardous waste.

(8) Place all recovered liquid wastes and contaminated soil in properly marked drums for removal to an approved disposal site.

(9) Damaged containers will be removed and disposed of off-site. Waste recovery drums will be replaced immediately.

(10) Any spilled material reaching spill containment tanks will be pumped from the tanks within 24 hours of the incident into DOT approved drums while awaiting chemical analysis prior to disposal.

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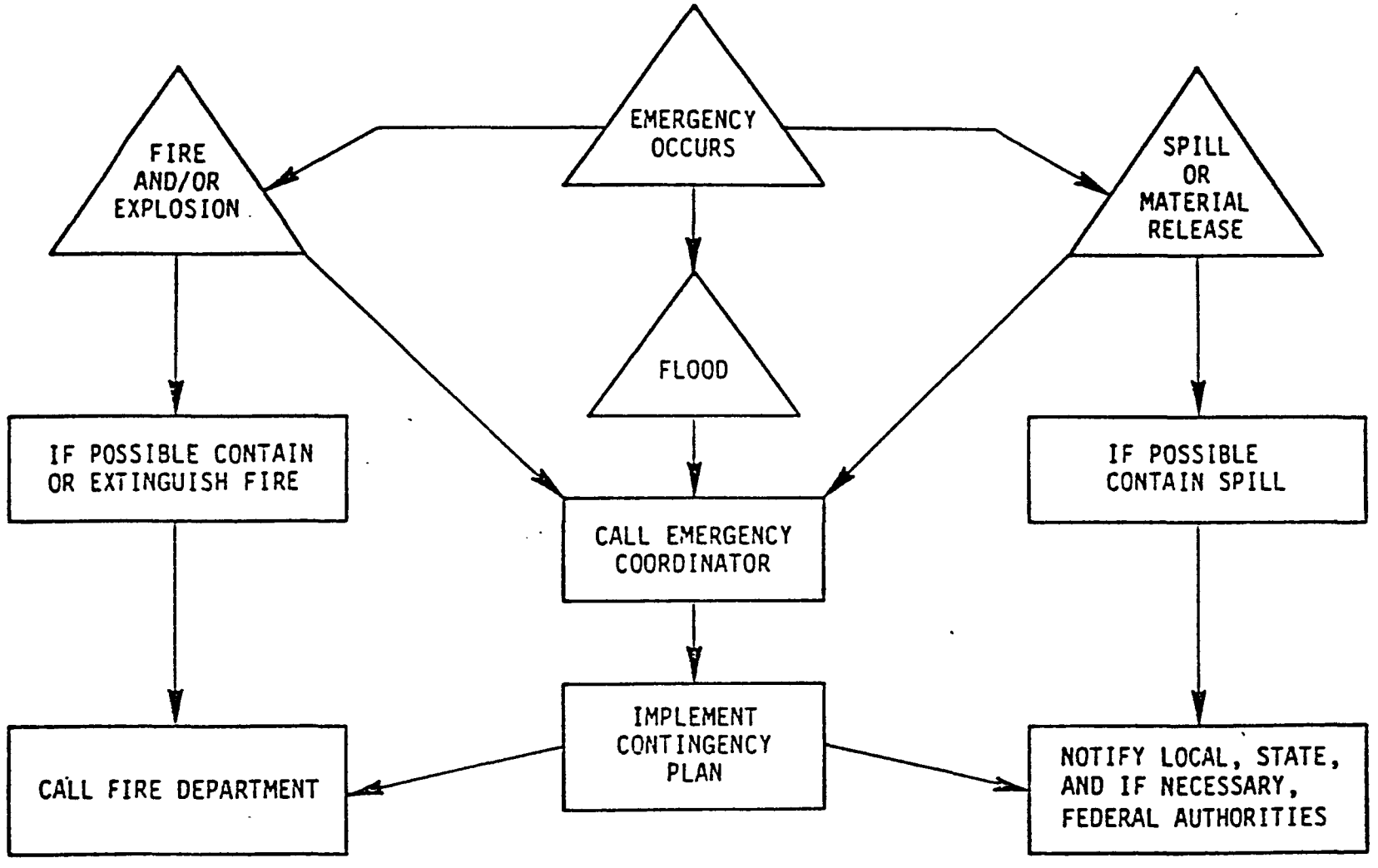

OVERVIEW OF EMERGENCY PLAN OF ACTION

PART I/SECTION E/ITEM 3

(A) In the event of a power outage, an emergency generator is available for lighting the facility. Fire-fighting equipment and telephone lines would not be affected by a power outage. (See I/E/2.)

(B) Hazards are prevented in unloading operations by ramps constructed at the unloading dock and between the two storage areas. The entrance/exit locations are equipped with curbing and are sloped toward the floor drains to ensure no flow of materials out of the doors.

(C) Protective clothing is available for personnel in the event of a spill or other mishap. These include goggles, gloves, hard hats, and containment suits with breathing apparatus.

(D) Water supplies for the ChemCon facility are provided by the City water system; therefore, contamination of water supplies is avoided.

(E) The hazardous waste storage area is covered by a roof, so there is no contaminated run-off from this source. Run-off from the parking lot should be uncontaminated; however, in the event of a spill, the run-off can be contained in a 15' x 15' x 3' lined sump. This sump is equipped with a gate and a pump and has the capacity to retain the first half inch of run-off from the parking lot. If it is suspected that the run-off from the parking lot is contaminated, the sump gate is closed until the water can be analyzed. If the water is found to be uncontaminated, then the gate is opened and it is discharged into the storm sewer. Otherwise, it is pumped into drums and sent to an appropriate treatment facility.

Calculations:

Parking lot dimensions: 150' x 85'

Parking lot area = 12,750 ft^2

First half inch of run-off: 12,750 ft^2 x $\frac{0.5"}{12\ in./ft}$ = 531.25 ft^3

= 3,974 gallons

Sump dimensions: 15' x 15' x 3'

Volume of sump = 675 ft^3 but assume 0.5 ft of freeboard;

so, 15' x 15' x 2.5' = 563 ft^3 capacity.

(F) Wastes are segregated according to flammability and corrosivity properties, so ignition or reaction is prevented. Also, "No Smoking" signs are posted and enforced. Storage area has an existing overhead sprinkler system which significantly reduces the probability of a major fire occurring.

ITEM 16.

As shown in the attached drawing, ignitive and reactive wastes are stored over 50 feet away from the property line.

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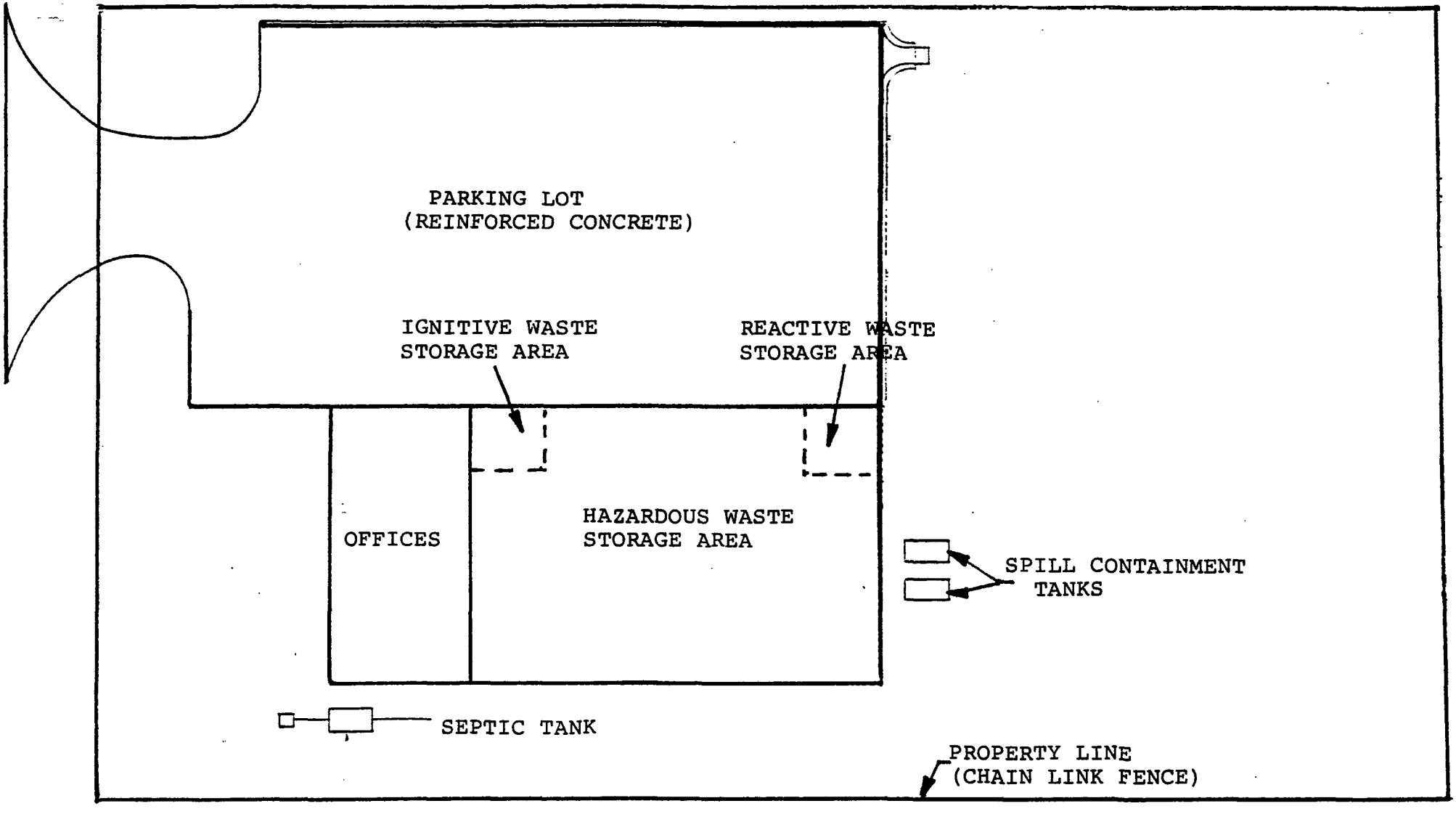

CHEMICAL CONSERVATION CORPORATION
FACILITY PLOT PLAN

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PART I/SECTION E/ITEM 4

Since the ChemCon facility only participates in the transport and/or storage of hazardous wastes, the potential for accidents is diminished. The building and equipment at the facility have been designed to minimize the occurrence of accidents. That is, the storage area is situated above the 100-year flood plain, and the area is equipped with drains and holding tanks to recover spill material. Therefore, the most threatening situation is presented by the out-break of a fire or explosion.

Precautions which have been instigated to prevent this occurrence are: (1) segregating flammable wastes from non-flammables and clearly marking the storage areas; (2) posting "No Smoking" signs in the storage area; (3) educating personnel as to the dangerous properties of materials handled and the consequences of negligence; (4) automatic sprinkler system in the storage area; and (5) fire wall between the storage area and offices.

In the event that a fire breaks out despite precautions, personnel have been instructed as to emergency procedures outlined in the Contingency Plan.

PART I/SECTION E/ITEM 5

PERSONNEL TRAINING

Outline of Training Program

INTRODUCTORY TRAINING

The introductory training that each category of personnel will receive will be designed to meet actual job tasks as well as an understanding of that actual job in the overall operation of ChemCon's facility. It is estimated that ChemCon personnel will receive a minimum of four hours of introductory training specifically related to their jobs and proper, safe handling of hazardous materials. Therefore, introductory training will include, but will not be limited to:

1. Definitions of hazardous waste.
2. Local, state and federal laws and regulations pertaining to hazardous materials.
3. ChemCon's role in transporting and storing hazardous waste.
4. ChemCon's lines of corporate communication and responsibilities for hazardous materials management.
5. How ChemCon determines hazardous wastes.
6. Procedures ChemCon uses for handling various classifications of hazardous wastes.
7. The employee's responsibility and liability for proper handling and managing hazardous materials.
8. The generator's responsibilities for hazardous wastes before, during and while ChemCon transports them.

Exhibit III

9. Manifesting procedures.
10. Recordkeeping requirements.
11. Handling processes and procedures.
12. Spill contingency program.
13. Use of safety equipment and devices required for job.
14. Proper containment.
15. Labeling and Placarding.
16. Location of safety equipment and devices.
17. Security systems and devices.
18. Availability of literature and data on the potential hazards of and procedures for handling various hazardous materials.
19. Locations, purposes and demonstrations of the monitoring and warnings systems at ChemCon's facility.
20. Demonstrations and discussions of the results of improper mixing of incompatible materials.
21. ChemCon's public information responsibility and procedures.
22. Emergency reporting procedures.
23. Distribution, explanation and discussion of useful guidance materials.
24. Attendance at approved offsite seminars and workshops.

ANNUAL REVIEW OF TRAINING

Annually each employee involved in hazardous material management at the ChemCon facility will undergo a supervisory review of his/her job function and responsibilities as they relate to hazardous materials.

ITEM 7.

The only personnel whose position is related to hazardous waste management is Rondal G. Chambers:

Name: Rondal G. Chambers

Title: Vice President

Job Description: Mr. Chambers supervises and directs entire organization. He acts as liaison between the generators of waste materials and the actual treatment/storage/disposal facilities. Mr. Chambers advises and directs sales staff and warehouse and trucking personnel. Mr. Chambers also oversees the training of truck drivers and warehouse personnel who require knowledge of EPA regulations, state regulations, etc.

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ITEM 8. Rondal G. Chambers

Mr. Chambers has seventeen years of experience in hazardous waste materials management. Formerly, Mr. Chambers held the position of Operations Manager for a treatment/storage/disposal facility. Mr. Chambers keeps abreast of legislation, regulations, EPA rulings, etc., and he attends seminars and classes relative to hazardous waste management.

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ITEM 9.

All ChemCon personnel presently employed in the management of hazardous materials will be provided introductory and continuing training within six months of their employment or assignment to the facility or a new position within the facility. All employees hired after the effective date of acceptance of this program will not be allowed to work in an unsupervised position involving hazardous materials until they have completed introductory training requirements and any additional training required for their specific job functions.

ChemCon recognizes the importance of annual training of its employees and plans to accomplish it in a highly professional manner applicable to its industry. It is estimated that each employee will receive at least approximately four hours annually of training directly related to hazardous materials' handling and management. This training will be carried on throughout the year by supervisory personnel stressing the importance and need for safety on the job. In addition, all employees will annually meet together to review under the direction of the Training Director safe practices at the ChemCon facility.

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82C

ITEM 10.

As part of employment, each employee is required to sign documentation attesting that he/she has received adequate introductory training and annual continuing training. This documentation will be kept on file and will include:

1. Employee's name
2. Job title
3. Job description/requisite skills or education
4. General description of type and amount of training provided
5. Date of training

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82 D

Chemical Conservation Corporation

653 ROCKET BOULEVARD • ORLANDO, FLORIDA 32824

1-305-859-4441

Warehouse Personnel

Warehouse personnel report and work under the direction of Mr. Russell Payne. Warehouse personnel load and unload shipments of hazardous waste as well as segregate waste awaiting shipment in the warehouse.

Truck Drivers

Chem-Con drivers load their vehicles from the various generators throughout the area, making sure that proper DOT shipping names, EPA waste codes, proper manifesting, labeling, and drum inspection are all in compliance with Federal, State and local regulations. Our drivers are well trained to use extreme caution in handling and transporting waste. All drivers are trained to handle an accidental spill, leak from our vehicles, as well as emergency spill response. Truck drivers report to Mr. Russell Payne.

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TRUCKING PERSONNEL

William and Mary Ammerman

Steve Bryant

Samuel P. Campbell

Gary G. Cooper

David Henry

Dennis McDonald

Robert McPherson

Harold Marsh

Dennis Mike Stoops

Gale Tranum

Billy Vaughn

Danny Woods

WAREHOUSE PERSONNEL

Eli Kirk

Russell Payne

Brian Ross Smith

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ATTACHMENT 5

PART I, SECTION F, ITEM

A. Cost of Closure (For closure details see Part II Section B, Item 6)

The cost of closure of the ChemCon facility is in three parts. The first is the wash down of the facility, with the intent for rental/sale as a warehousing facility. The second part of the closure is the cleaning and removal of the two emergency concrete tanks for spill control at the rear of the facility. These tanks, after cleaning, will be removed and shipped to Chem Met in the Detroit area...the (approved TSDF) for disposal. The estimated cost of this closure is $2,500.

B. Financial Responsibility

Enclosed is a copy of ChemCon Certificate of Insurance.

Certificate of Insurance

acord

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY

Environmental Compliance Service
Box A
Downington, PA 19335

NAME AND ADDRESS OF INSURED

Chemical Conservation Corporation
c-o 18550 Allen Road
Wyandotte, Michigan 48192

COMPANIES AFFORDING COVERAGES

COMPANY LETTER A: National Union Fire Insurance

COMPANY LETTER B:

COMPANY LETTER C:

COMPANY LETTER D:

COMPANY LETTER E:

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE	Limits of Liability in Thousands (000)		
					FOR COVERAGE	AGGREGATE
A	GENERAL LIABILITY ☒ COMPREHENSIVE FORM ☒ PREMISES - OPERATIONS ☐ EXPLOSION AND COLLAPSE HAZARD ☐ UNDERGROUND ☒ PRODUCTS - COMPLETED OPERATIONS ☒ CONTRACTUAL ☒ BROAD FORM PROPERTY DAMAGE ☒ INDEPENDENT CONTRACTORS ☒ PERSONAL INJURY	S9962116	11-1-86	BODILY INJURY	$	$
				PROPERTY DAMAGE	$	$
				BODILY INJURY AND PROPERTY DAMAGE COMBINED	$ 1,000	$ 1,000
				PRODUCTS AGGREGATE		$ 1,000
A	AUTOMOBILE LIABILITY ☒ COMPREHENSIVE FORM ☒ OWNED ☒ HIRED ☒ NON-OWNED	BA9288949	11-1-86	BODILY INJURY EACH PERSON	$	
				BODILY INJURY EACH ACCIDENT	$	
				PROPERTY DAMAGE	$	
				BODILY INJURY AND PROPERTY DAMAGE COMBINED	$ 1,000	
	EXCESS LIABILITY ☐ UMBRELLA FORM ☐ OTHER THAN UMBRELLA FORM			BODILY INJURY	$	$
				PROPERTY DAMAGE		
				BODILY INJURY AND PROPERTY DAMAGE COMBINED		
A	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY	WC7147532	11-1-86		$100/500	
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 30 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

Department of Natural Resources
State of Michigan
P.O. Box 30028
Lansing, MI 48909

DATE 10/31/85

AUTHORIZED REPRESENTATIVE

85

ACORD 25 (10 82)

ATTACHMENT 6

PART II/SECTION B/ITEM 1(b)(1),(2)

Secondary Containment System Design and Operation

The container storage area floor is constructed of reinforced concrete, 12" thick and the wall to floor joints are sufficiently sealed. The floor in each area slopes at approximately 1% to drains connected to 1200 gallon containers located outside the storage building. A 6" high concrete curb lines the storage areas to provide a holding capacity of 8240 gallon and 9170 gallon for the flammable area and corrosive areas respectively, or more than 50% of the 550 drum storage capacity.

The calculations are as follows:

Flammable storage area

38' x 58' x .5' x 7.48 gal/cf = 8,242 gallons

Corrosive storage area

[(49 x 58)-(26 x 15)] x .5' x 7.48 gal/cf = ~~30,250~~ 9170 gallons

550 drums x 55 gallons/drum = 30250 gallons

$$\frac{8242 + 9170}{30250} = 57.6\%$$

The concrete floor is presently in good condition (constructed May of 1985), free of gaps, holes, or cracks. The entire floor is specially coated with epoxy to prevent damage in the event of a spill.

ITEM 12. FLOOR COVERING SPECIFICATIONS

The Semstone 140-S epoxy floor covering for which specifications were submitted on July 11, 1986, was not the floor covering which was eventually used at ChemCon. Instead, DIAMONDHARD (TM) Resin Coating manufactured by Rodger's Industries was used and its specifications are enclosed.

DIAMONDHARD is a polyester coating with a silica aggregate and is modeled after Quantum Polymorphic Resin which is EPA approved. The enclosed manufacturer's data provides further information as to DIAMONDHARD's properties.

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Rodger's Industries
COATINGS DIVISION

DIAMONDHARD (TM) RESIN COATINGS

P.O. Box 838
Fern Park, Florida 32730
Phone (305) 331-4241

August 25, 1986

RECEIVED AUG 2 7 1986

Cross, Tessitore & Associates
Att: Ms. Rosemary Robinson
4759 S. Conway
Suite D
Orlando, Florida 32812

Re: Product information on DIAMONDHARD (TM) Resin Coating.

Dear Ms. Robinson,

In response to your phone call on 8/22/86, I am sending this letter with information as to the typical physical properties and chemical corrosion resistance of our product DIAMONDHARD (TM).

Although this is a new product and most certainly resistant to more chemicals then specified here, I hope this partial listing (as has been tested) will be of help to you.

As this product is largely a modified polyester/styrene monomer resin with aggregate fillers, general testing has been completed by the National Association of Corrosion Engineers, and is listed as follows:

PHYSICAL PROPERTIES

Min. Application Temp. fah.	40
Traffic Limitations-Full Service	16 hrs.
Tensile Strength PSI	2,000
Compressive Strength PSI	10,000
Flexural Strength PSI	1,500
Coeff. of Expansion In/In/fah.	20x10-6
Shrinkage %	3
Abrasion Resistance	Good

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CHEMICAL CORROSION RESISTANCE

ACIDS:		
	Sulfuric 10%	Recommended
	Sulphuric 70%	Recommended
	Hydrochloric 10%	Recommended
	Hydrochloric 35%	Recommended
	Nitric 10%	Recommended
WATER:		
	Distilled	Recommended
	Salt Water	Recommended
ALKALIES:		
	Sodium Hydroxide 5%	Recommended
	Ammonium Hydroxide 10%	Recommended
GASES:		
	Chlorine	Recommended
	Hydrogen Sulfide	Recommended
ORGANICS:		
	Alcohols	Recommended
	Aliphatic Hydrocarbons	Recommended
	Aromatic Hydrocarbons	Recommended
	Esters	Limited Recommended

Although this information is believed to be accurate, we do not assume any legal responsibility for the use or reliance upon the same. Customers should conduct their own test, as it is the user's responsiblility to be guided by his own tests in determining suitability of any such product, method or apparatuse for his purpose.

Sincerely,

Rodger L. Marjama, Owner
Rodger's Industries

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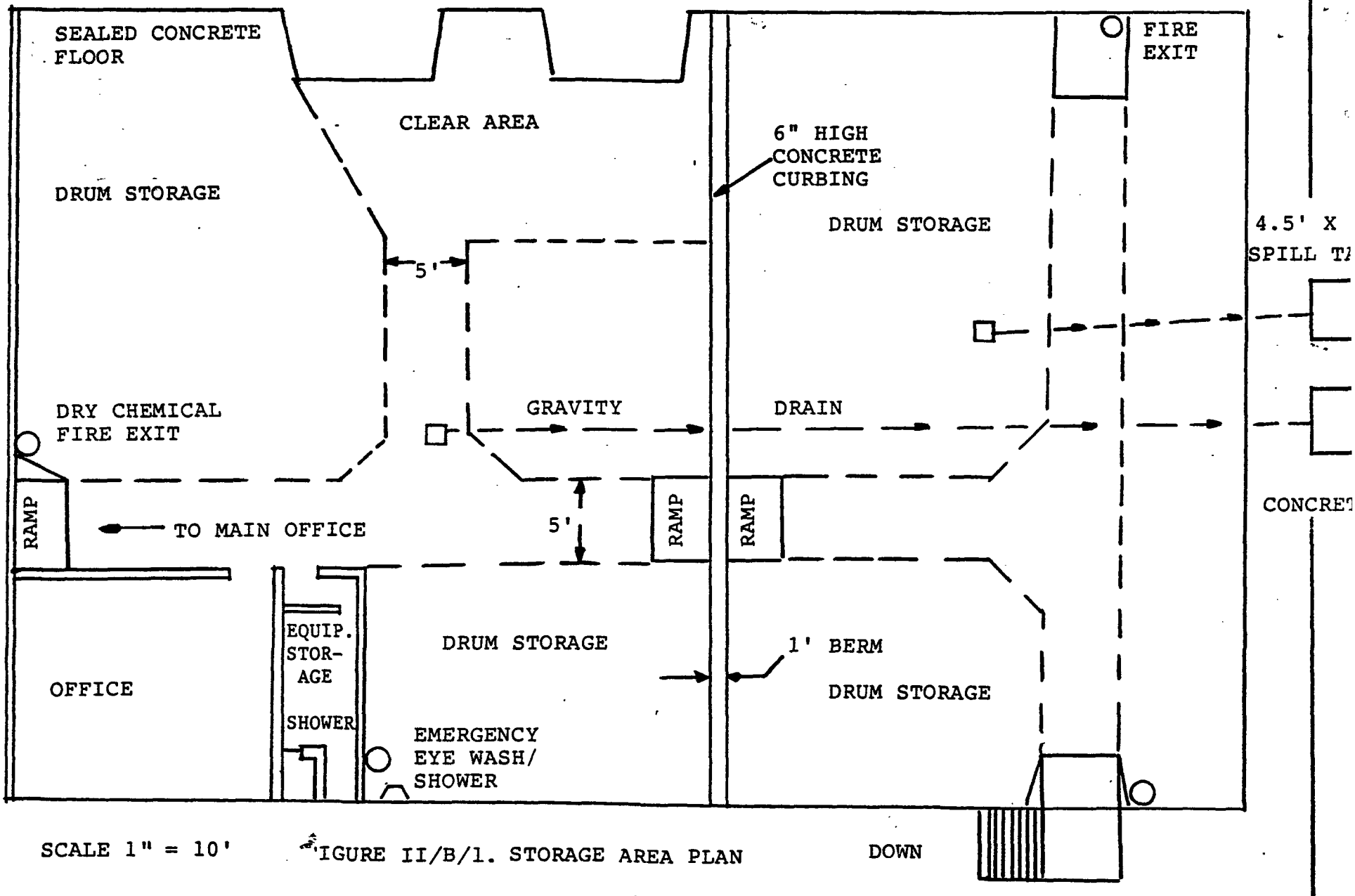

FIGURE II/B/1. STORAGE AREA PLAN

PART II/SECTION B/ITEM 1(b)(3)

There is approximately 5,000 SF of storage space of which about 1160 SF is aisle space for fork lift access to each area, and 510 SF is an office and work area. The remaining 3,450 SF area is actual storage space which is divided into two separate areas described above, separated by a concrete curb and cross-over ramp. See Figure

The combined drum capacity of the storage area is approximately 550 drums stacked in one layer. The actual number of drums stored at any one time will vary. Volume produced by generators is seldom constant.

PART II/SECTION B/ITEM (b)(4)

The storage area is not susceptible to run-on due to the fact that the floor elevation is approximately 2 feet above the 100 year flood elevation.

ITEM 13. (Submitted as corrected version of original permit application)

PART II/SECTION B/ITEM 1(5)

Removal of Liquids from Containment Areas

Each storage area described above has a drain in the center of the containment area, and the floor is sloped at 1% to the drain. Each drain is connected to separate 1200-gallon holding tanks by gravity drain lines. In the event of a spill or washdown, the liquid will be pumped from the 1200-gallon holding tanks within 24 hours of the spill incident and stored in DOT approved drums while awaiting analysis for proper disposal. Sand or Sorball will be used to soak up any residual liquid left after initial clean-up. It too will be drummed and diposed of accordingly.

Chemical Conservation Corporation does not currently handle containers without free liquids.

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ITEM 14.

1200 gallon capacity

Leaks which are not detected in the spill containment tanks during weekly visual inspections will be tested for every three (3) months. The test procedure is as follows:

(1) Tank will be filled with water, and the depth of the water will be measured every hour for eight hours. This data can establish a leakage rate, if any.

(2) Tanks will be tested on separate days for an eight-hour period each.

(3) The tanks have not yet been used to contain hazardous waste spills, so the water used to test for leaks can be discharged to the storm sewer. Once the tanks have been used to contain spills, they will be triple rinsed prior to testing. The 3 rinsates will be drummed and shipped off-site as hazardous waste for suitable disposal, and the water from testing will be discharged into the storm sewer.

(4) Any detected leaks will be repaired as soon as possible. In the mean time, any spills which are collected by the containment tanks will be removed immediately.

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PART II/SECTION B/ITEM 4

Description of Containers

Materials received at the ChemCon facility will be delivered in an assortment of containers. Of the materials received, all will be compatible with the containers in which they are delivered. By far the most common container will be the 55 gallon steel drum. All containers are sealed.

ITEM 15.

Enclosed are the engineering drawings and specifications for the container storage facility. These are copies of the original sealed drawings which were certified by a Florida-registered professional engineer. The original drawings are on file at Gator Metal Buildings, 235 Maitland Avenue, Maitland, Florida (629-4321). The following drawings are enclosed:

(1) Plot and Floor Plans and Elevations

(2) Foundation Plan

(3) Roof Framing Plan

(4) Anchor Bolt Plan

(5) Back Sidewall

(6) Front Sidewall

(7) Left Endwall

(8) Right Endwall.

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Inspection Schedule

General Inspection Requirements

ChemCon conducts regular inspections of the facility for equipment malfunctions, structural deterioration, operator errors, and discharges that could cause or lead to the release of hazardous waste constituents and adversely affect the environment or threaten human health.

INSPECTION SCHEDULE

AREA/EQUIPMENT	SPECIFIC ITEM	TYPES OF PROBLEMS	FREQUENCY OF INSPECTION
Safety & Emergency Equipment	Standard industrial absorbents	Out of Stock	Monthly/as needed
	Absorbent pads	Out of Stock	Monthly/as needed
	Flexible hoses w/ quick couple fittings	Cracks or holes, fittings stock	Monthly
	55 gallon drums	Corrosion, structural damage	Monthly
	Emergency shower and eye wash	Water pressure, leaking, drainage	Weekly
	Face shields and extra protective eye glasses	Broken or dirty equipment	Monthly
	Disposable Respirators	Out of Stock	Monthly/as needed
	Chemical cartridge respirators	Spent chemical absorbent, seals	Monthly/after each use
	Chest-mounted gas mask cannisters	Cannisters become exhausted	Monthly/after each use
	Self-contained breathing apparatus (SCBA)	Air quantity in reserve air delivery system	Monthly/after each use
	Fire blankets	Dispensing	As used
	Fire extinguishers	Needs recharging	Monthly/after each use
	Spill containment drums	Corrosion, structural damage	Weekly
	Spill containment tanks	Cracks, deterioration	Weekly

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INSPECTION SCHEDULE (Cont'd)

AREA/EQUIPMENT	SPECIFIC ITEM	TYPES OF PROBLEMS	FREQUENCY OF INSPECTION
Safety & Emergency Equipment	Fire alarm system	Power failure	Per NFPA
	Telephone system	Power failure	Per NFPA
	First aid equipment and supplies	Items out of stock or inoperative	As used
	Protective clothing	Holes, normal wear and tear	As used
	Decontamination facility (showers, dirty room, clean room)	Water pressure, drainage, upkeep, leaking	As used
Security Devices	Facility fence	Corrosion, damage to chain-link fence	Weekly
Container Storage Area	Container placement and stacking	Aisle space, height of stacks	Daily
	Sealing of Containers	Open lids	Daily
	Labeling of Containers	Improper identification missing date	Daily
	Containers	Corrosion, leakage, structural defects	Daily
	Segregation of incompatible wastes	Storage of incompatible wastes in same area	Daily

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INSPECTION SCHEDULE (Cont'd)

AREA/EQUIPMENT	SPECIFIC ITEM	TYPES OF PROBLEMS	FREQUENCY OF INSPECTION
Container Storage Area	Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
	Warning Signs	Damaged	Weekly

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DAILY INSPECTION LOG

DATE _____

TIME _____

INSPECTOR _____

ITEM	CONDITION	RECOMMENDED REPAIRS OR REMEDIAL ACTION	DATE OF REPAIRS
CONTAINER PLACEMENT AND STACKING			
CONTAINER SEALS			
LABELING OF CONTAINERS			
CONTAINER CONDITION			
SEGREGATION OF INCOMPATIBLE WASTES			

COMMENTS _____

_____

_____

INSPECTOR'S INITIALS _____

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WEEKLY INSPECTION LOG

DATE _____

TIME _____

INSPECTOR _____

ITEM	CONDITION	RECOMMENDED REPAIRS OR REMEDIAL ACTION	DATE OF REPAIRS
EMERGENCY SHOWER/ EYE WASH			
SPILL CONTAINMENT DRUMS			
SPILL CONTAINMENT TANKS			
FACILITY FENCE			
FOUNDATION OF STORAGE BUILDING			
WARNING SIGNS			

COMMENTS _____

_____

_____

INSPECTOR'S INITIALS _____

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DATE _____ TIME _____ INSPECTOR _____

ITEM	CONDITION	RECOMMENDED REPAIRS OR REMEDIAL ACTION	DATE OF REPAIRS
INDUSTRIAL ABSORBENTS			
ABSORBENT PADS			
FLEXIBLE HOSES			
55-GALLON DRUMS			
FACE SHIELDS AND EXTRA PROTECTIVE EYEGLASSES			
DISPOSABLE RESPIRATORS			
CHEMICAL CART-RIDGE RESPIRATORS			
CHEST-MOUNTED GAS MASK CANNISTERS			
SELF-CONTAINED BREATHING APPARATUS			
FIRE BLANKETS			
FIRE EXTING-UISHERS			
FIRST AID EQUIPMENT AND SUPPLIES			
PROTECTIVE CLOTHING			
DECONTAMINATION FACILITY			

COMMENTS _____

_____

_____

INSPECTOR'S INITIALS _____

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ITEM 19.

PART II/SECTION B/ITEM 6

In the event that this facility is forced to close, the following steps will be taken to minimize the need for post-closure maintenance, and to minimize the possible release of hazardous waste to the environment:

(1) The floor of the container storage area will be decontaminated--washed down, rinsed thoroughly, drained and emptied of any residue.

(2) The drainage sump will be drained, thoroughly rinsed and emptied of any residue.

(3) Each holding tank will be drained, thoroughly rinsed, emptied of any residue, and the contents collected in drums.

(4) All hazardous wastes accumulated from these procedures will be collected in drums and analyzed, then appropriately marked, labeled, and shipped to a qualified disposal facility along with any other drums of hazardous waste generated up to that time. Manifests will be prepared and copies filed upon receipt.

(5) An opportunity for a post-closure inspection will be afforded to the F.D.E.R. for confirmation of compliance with this plan.

(6) The facility will be secured to prevent unauthorized access.

(7) There are no post-closure maintenance procedures anticipated at this time.

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CLOSURE SCHEDULE

Closure is not anticipated any time in the near future. However, should closure be necessary, the following schedule would be established:

(1) Decontamination of floor:	24 days
(2) Cleaning of drainage sump:	3 days
(3) Cleaning of holding tanks:	5 days
(4) Drum residuals from cleaning processes:	4 days
(5) Disposal of hazardous wastes to any approved disposal facility:	30 days
(6) F.D.E.R. site inspection:	5 days

ITEM 20.

A Florida registered professional engineer will inspect the closure activities described in the closure plan and will certify that the facility is closed according to the guidelines established in this closure plan as approved by FDER. The certification of closure will be submitted to FDER upon completion of the closure activities.

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PART II/SECTION B/ITEM 1(a)

Existing Facility Container Management Practices

Chemical Conservation Corporation's existing facility is not a generator of hazardous waste but merely a transport and storage facility; therefore, information in this section will only pertain to container handling practices after waste drums are delivered to the site in ChemCon trucks. All drums that are handled by this facility are 55 gallon containers.

The drums are delivered to the site in ChemCon tractor trailer trucks in quantities of 10-80 drums. The drums are removed from the truck by a fork lift or hand cart one drum at a time. Each drum is inventoried by ChemCon personnel using the manifest provided by the generator as it leaves the truck. The fork lift driver is then instructed as to in which area the drums are to be stored. The entrance/exit locations are equipped with curbing and are sloped toward the floor drain to ensure no flow of materials out of the doors.

Drums are stored directly on the concrete floor and if necessary stacked two drums (8' high). Primary aisle space of at least 5 feet is maintained at all times and the container storage area is inspected by qualified ChemCon personnel on a regular basis.

The storage facility is located indoors and the floor elevation is approximately 2 feet above the 100 year flood elevation. This area is not susceptible to flooding from run-on or run-off. There are no sewer drains connected to the storage containment area.

The ChemCon facility is divided into flammable and non-flammable storage areas separated by a concrete curb. Each area has a separate floor drain which leads to a gallon storage tank for spill containment and washdown. The design and specifications for the container storage facility were certified by a Registered Professional Engineer.