From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]
Sent: Friday, July 29, 2011 10:51 AM
To: Winston, Kathy
Cc: mallick.parvez@epa.gov
Subject: "Safety-Kleen Medley Facility"
Attachments: Table 6 1-1.doc; Annual Hazwoper Training Course Outline.doc; 2011 Annual Hazwoper Certificates.pdf; Section 7.0.doc

Kathy,

Attached please find the items you had requested from your site inspection of our Medley facility last Thursday July 21, 2011. I am attaching the training outline for our regulatory training centers, which all employees that will be handling hazardous waste attend at the start of employment with Safety-Kleen. I am also attaching an outline of the topics we cover during our annual hazwoper refresher and the certificates for the Medley employees. The last attachment is the WAP that you had requested. If you need additional information please let me know.

Thanks,

Jeff Curtis
EHS Manager, Florida
Safety-Kleen Systems, Inc.
Office: (561) 738-3026
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Annual Hazwoper Training Course Outline

- **Hazard Recognition**
- **Hazard Communication**
- **PPE & Respirator Use**
- **Toxicology**
- **Bloodborne Pathogens**
- **Ergonomics**
- **Fire Safety**
- **Hearing Conservation**
- **Lock out / Tag out**
- **Confined Space Entry**
- **RCRA Refresher**
- **Contingency Plan**
- **SK Special Topics – Environmental Management System (ISO 14001), Standard Operating Procedures (SOPs), Branch Operating Guidelines (BOGs).**

Certificate of Training

This is to certify that

Victorero, Yuniel D

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306817-00434062-06212011

Certificate of Training

This is to certify that

Vazquez, Anibal

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306817-00437575-06212011

Certificate of Training

This is to certify that

Santana, Rudy

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306817-00437025-06212011

Certificate of Training

This is to certify that

Rodriguez, Rene E

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S	*June 21, 2011*
Instructor	**Date**

70306817-00435627-06212011

safety-kleen

Certificate of Training

This is to certify that

Rodriguez, Larry D

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S	*June 21, 2011*
Instructor	**Date**

70306817-00000090-06212011

Certificate of Training

This is to certify that

Rigo, Jorge Ramon

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S	*June 21, 2011*
Instructor	**Date**

70306817-00024978-06212011

Certificate of Training

This is to certify that

Mendez, Lazaro H

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306817-00029091-06212011

Certificate of Training

This is to certify that

Howard, Vakieth L

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306817-00430358-06212011

Certificate of Training

This is to certify that

Hall, Eddie Lee Jr

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306817-00433941-06212011

Certificate of Training

This is to certify that

Formoso, Juan M

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S	*June 21, 2011*
Instructor	**Date**

70306817-00003030-06212011

Certificate of Training

This is to certify that

Effio, Diego

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306817-00435643-06212011

Certificate of Training

This is to certify that

Adams, Bokarra Maco

has successfully completed a course of instruction in

ANNUAL HAZWOPER-RCRA REFRESHER

HS_104B

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306817-00027350-06212011

Certificate of Training

This is to certify that

Gonzalez, Gail A

has successfully completed a course of instruction in

US EPA REGS. RCRA UPDATE

ET_140

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306818-00435227-06212011

Certificate of Training

This is to certify that

Rivera, Yvette

has successfully completed a course of instruction in

US EPA REGS. RCRA UPDATE

ET_140

Curtis, Jeffery S

Instructor

June 21, 2011

Date

70306818-00434593-06212011

TABLE 6.1-1

OUTLINE OF TRAINING TOPICS

Day	Topic	SK Course Name
Monday	Welcome / Introductions/Ground Rules	Driver Training Essentials
	Driver Qualifications	
	Driver Wellness	
	Whistleblower Protection	
	Hours of Service Regulations	
	Exempt Log Training	
	Pre & Post Trip Inspections	
	Load Securement	
	Vehicle Cone Program	
Tuesday	Welcome / Introductions/Ground Rules	HAZWOPER
	Regulatory Compliance	
	Hazard Recognition	
	Hazard Communication	
	Respiratory Protection	
Wednesday	Walking & Working Surfaces	HAZWOPER
	Patriot Act For Employees	
	Personal Protective Equipment	
	Decontamination	
	Toxicology	
	Medical Surveillance	
	Hearing Protection	
Thursday	Ergonomics	HAZWOPER
	Fire Prevention & Protection	
	Lockout/Tagout Awareness	
	Electrical Safety	
	Confined Space Awareness	
	Container Handling	
Friday	Introduction	Hazardous Materials Transportation Skills (HMTS)
	Definitions	
	D.O.T. Regulations	
	Hazard Classes	
	Hazardous Materials Table	
	Shipping Papers	
	Marking	
	Labeling	
	Placarding	
	Hazardous Materials Segregation	
	Packaging	
	Incidents	

Day	Topic	SK Course Name
Friday (cont'd)	Load Securement	HMTS (cont'd)
Saturday	RCRA Regulations	Branch Technical Training
	Waste Material Profiling	
	Sampling Hazardous Materials	
	Shipping HazMat Samples via ground	

7.0 WASTE INFORMATION

7.1 WASTE ANALYSIS AND WASTE CODES

In accordance with EPA's hazardous waste regulations, the following types of hazardous waste have been identified at the Branch:

- Used parts washer solvent, dumpster mud, and tank bottom sludge;
- Used immersion cleaner #699;
- Dry cleaning wastes;
- Paint wastes;
- Fluid Recovery Service (FRS) wastes;
- Used aqueous parts washer solvent;
- Used aqueous brake cleaner; and
- Branch generated liquids and solids (debris).

The typical composition and chemical/physical analysis for each of the waste streams listed above (except FRS) is shown in the chemical analyses reports in Appendix B. This information is based on existing data generated from similar processes within Safety-Kleen's current and/or potential customer base.

7.1.1 USED PARTS WASHER SOLVENT

The clean parts washer solvents are labeled under trade names. Flash points of the petroleum-based parts washer solvents range from 105ºF (ignitable) to 212ºF. Chemically, the solvent primarily consists of petroleum hydrocarbon fractions with boiling points between 310ºF and 400ºF. Impurities, such as light aromatic hydrocarbons (LAHC) and chlorinated hydrocarbons, usually constitute less than one percent of the total volume.

The used petroleum-based parts washer solvent consists primarily of parts washer solvent, solids, oil, and grease picked up in the various degreasing operations. In most instances, no water is associated with the used solvent; however at times, the water

content may range from one percent to as much as 50 percent. The oily bottom solids may range from 2 percent to 10 percent, by volume, in the used solvent mixture. The substances that comprise the used parts washer solvent are compatible and are suitable for bulking.

Chemically, the composition of the solvent fraction in the used parts washer solvent is essentially the same as the clean solvent, as shown in analyses.

Containers of parts washer solvent that are returned form customers are poured into a drum washer (wet dumpster) at the return/fill station, which is piped into the used solvent 20,000-gallon aboveground storage tank located in the tank farm. As generated, the used Parts Cleaner 105 is considered to be an ignitable waste (D001). Other used parts washer solvents are considered non-ignitable. The mixture within the 15,000-gallon storage tank, therefore, may not exhibit the characteristic of ignitability, though it is managed as such. The used parts washer solvents also may be considered characteristic waste by toxicity characteristic leaching procedure (TCLP) and may carry the waste codes referred to in Table 7.1-1.

7.1.2 Used Immersion Cleaner

Safety-Kleen leases units containing “Immersion Cleaner and Carburetor and Cold Parts Cleaner #699”. This product is a heavy aromatic naphtha, N-methyl-2-pyrrolidinone, dipropylene glycol methyl ether, monoethanolamine and oleic acid, and may contain a maximum of 1 percent chlorinated compounds.

The used immersion cleaner #699 is returned from customers in separate containers and remains in these containers for shipment to a Safety-Kleen recycle facility. The used immersion cleaner is basically unchanged from its clean state, except oil, grease, and other solids may be picked up during the various degreasing operations. This spent solvent is not an ignitable waste. It is regarded as characteristic hazardous waste because

of the presence of various metals and organic constituents. The waste codes that the used immersion cleaner may carry are listed in Table 7.1-1.

7.1.3 Used Parts Washer Solvent Bottom Sludge

Tank bottom sludge settles from used parts washer solvent in the aboveground tank. The sludge may contain soils, oil, grease, and water picked up in degreasing operations, together with a small amount of mineral spirits. Analyses have shown that the sludge may be considered characteristically hazardous with respect to TCLP standards. The sludge is removed form the aboveground storage tank periodically and shipped to a Safety-Kleen recycle facility for reclamation/disposal.

Dumpster mud is accumulated in the wet dumpsters when emptying the used parts washer solvent from the containers. Filters from parts washers utilizing parts washer solvents also may be present along with small metal parts. The nature of this waste is similar to the used parts washer solvent tank bottom sludge, except with some small metal parts and less mineral spirits. It is regarded as an ignitable waste and often is characteristic for other contaminants using TCLP standards.

The mud in the dumpsters is cleaned out frequently. The waste is containerized and stored as a Branch-generated waste in the permitted waste storage area for later shipment to a Safety-Kleen recycle facility for reclamation or disposal.

Parts washer solvent dumpster mud accumulated in the solvent return receptacles (wet dumpsters) is considered to be an ignitable waste (D001) and characteristic waste by TCLP and may carry the waste codes referred to in Table 7.1-1. Parts washer tank bottoms may be considered characteristically hazardous with respect to TCLP and may carry the waste codes referred to in Table 7.1-1.

7.1.4 Dry Cleaning Wastes

Solvent used in dry cleaning of clothing is commonly tetrachloroethylene (perchloroethylene), mineral spirits, or trichlorotrifluoroethane. Hence, wastes generated are:

1. Filter Cartridges: In addition to the construction materials consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease, and undissolved elements such as lint and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight.
2. Muck: At some dry cleaning facilities, a mixture of powdered materials is used as the filter medium for the dry cleaning solvent, in lieu of the cartridge filter. This filter medium normally consists of diatomaceous earth and carbon. In addition to lint, soil, and grease retained by this medium, between 40 and 50 percent by weight of the "muck" is absorbed solvent.
3. Still Residue: After filtration, the dry cleaning solvent is distilled by the dry cleaning machine to remove the dissolved materials from the used solvent. The dissolved materials (still residues) are in liquid form and consist of primarily detergent, oil and grease, vinyl acetate (a sizing compound), and 20 to 30 percent of solvent.

Approximately 80 percent of the dry cleaning solvent used is perchloroethylene (F002) and characteristic waste by TCLP that may carry the waste codes referred to in Table 7.1-1. Approximately 17 percent of the dry cleaning solvent is mineral spirits (naptha), and the remaining 3 percent of the dry cleaning solvent is trichlorotrifluoroethane. Analyses have shown these dry cleaning wastes may be characteristically hazardous by TCLP and may carry the waste codes referred to in Table 7.1-1.

7.1.5 Paint Wastes

Paint wastes consist of various lacquer thinners and paints. The waste is collected in

containers at the customer's place of business. Upon receipt at the Branch, the manifest is terminated, and the waste paint containers are stored in Safety-Kleen's permitted container storage area. The paint wastes are then re-manifested and periodically sent to a Safety-Kleen recycle center. Paint wastes include such constituents as acetone, isopropyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, toluene, xylenes, and acetate compounds. This waste stream may be an ignitable waste (D001) and characteristic for other contaminates by TCLP. Because of the solvent constituents, it also may be considered a listed waste (F003, F005) and may carry the waste codes referred to in Table 7.1-1.

7.1.6 Fluid Recovery Service Wastes

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Branch. These wastes are handled as transfer wastes at the Branch. Examples of the types of wastes that may be received from FRS customers include:

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, and naptha, etc.
- Lubricating oils, hydraulic oils, synthetic oils, and machine oils.
- Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane.
- Photographic and x-ray related wastes.
- Paint, lacquer thinners, and paint wastes.
- Other hazardous and non-hazardous halogenated and non-halogenated wastes.

Due to the great variability in the composition of FRS wastes, their application or use, and the source industry, Safety-Kleen characterizes each waste stream from each generator separately.

7.1.7 Used Antifreeze

The spent antifreeze (ethylene glycol) is collected from automobile service stations.

All antifreeze collected and managed by Safety-Kleen within Florida is recycled. At the customer's location, Safety-Kleen pumps waste ethylene glycol (antifreeze) into a Safety-Kleen used oil tanker truck. This truck transports the used antifreeze to the branch for off-loading into a tanker for storage. Used antifreeze is then picked up by a recycler for processing into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's *Florida Fact Sheet on the Best Management Practices for Managing Antifreeze Destined for Recycling*, dated February, 2007. The Florida Department of Environmental Protection (FDEP) has determined this waste stream can be handled as non-hazardous as long as it is destined for recycling.

7.1.8 Aqueous Brake Cleaner

The Aqueous Brake Cleaner (ABC) is primarily an aqueous solution with approximately 10% nonorganic additives and detergents. The spent ABC is transported from the customers in containers. Spent ABC from customer's parts washers will be accumulated in the 20,000-gallon used solvent storage tank via the return/fill station. The used aqueous parts washer solvent may be considered characteristic waste by TCLP and may carry the waste codes referred to in Table 7.1-1.

7.1.9 Aqueous Parts Washer Solvent

The aqueous parts washer solvent is primarily an aqueous solution with a small amount of organic additives (alcohols). The spent aqueous parts washer solvent is transported customers in containers and will be accumulated in the 20,000-gallon used solvent storage tank via the return/fill station. The used aqueous parts washer solvent may, or may not be considered characteristic waste by TCLP and may carry the waste codes referred to in Table 7.1-1.

7.1.10 Mercury-Containing Lamps and Devices

Mercury-containing lamps and devices are another type of waste handled by the Branch. These wastes are handled as non-regulated transfer wastes, and as such carry no waste codes. As part of its protocol for handling mercury-containing lamps and devices, the Branch provides customers with four-foot and eight-foot boxes which hold up to 39 lamps. The boxes are picked up at customer locations and are stored at the Branch in a designated area within the transfer waste storage area (Figure 8.1-1). These containers are labeled in accordance with 62-737.400(5)(b)., Florida Administrative Code (FAC). The boxes are periodically shipped to a permitted mercury recovery or reclamation facility.

7.1.11 Branch Generated Liquids and Solids (Debris)

In the course of conducting day-to-day business operations, the Branch may generate waste primarily associated with sampling customers' wastes. Such wastes may include wipes, gloves, etc. In addition, liquid wastes may be generated as a result of the decontamination of sampling equipment. The liquid and solid wastes are contained in drums which can be stored in the permitted container storage area. The waste codes associated with this waste stream will vary according to the type of waste being sampled. Branch-generated liquid and solids (debris) may carry the waste codes listed in Table 7.1-1.

7.2 WASTE ANALYSIS PLAN

7.2-1 General Waste Handling Procedures

Safety-Kleen provides solvent distribution, collection, and reclamation services to companies that are primarily engaged in automobile repair, industrial maintenance, and dry cleaning. Safety-Kleen operates a "closed loop" waste recovery service for the parts

cleaning machines used by customers at their facilities. When the cleaning fluids become dirty and can no longer be used effectively, Safety-Kleen picks up the dirty fluids and replaces them with clean fluids. The dirty fluids are returned to Safety-Kleen where they are recycled and subsequently reused by customers. Approximately two-thirds of the cleaning fluids provided as product by Safety-Kleen have been use before and subsequently reclaimed. Safety-Kleen's customers typically are small quantity generators who operate businesses which generate only a few hazardous waste streams. These factors help insure that Safety-Kleen will receive a highly predictable and homogeneous waste stream.

Spent Solvents are the primary feedstocks for the generation of Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. Furthermore, the materials collected at the Branch are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect certain materials before returning them to the Branch. This mode of operation has been proven to safetguard the recycling process and maintain a quality product.

It is Safety-Kleen's practice that suspected nonconforming material must not be accepted until a full analysis has been done or the material must be rejected. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

Safety-Kleen controls the use and management of its solvents by:

- Limiting the solvents stored to those compatible with one another and their containers;

- Determining the customer's type of business (i.e., his/her SIC code may be recorded) and the purpose for which the machine will be used;
- Training customers to use the machines properly;
- Training employees to inspect spent solvent and determine whether it is acceptable;
- Marking each container with the customer's name, address, and EPA ID number (if required). This information remains on containerized waste until it is accepted at the Branch;
- Keeping a record of each incoming and outgoing shipment in the operating log at each facility;
- Demonstrating the chemical and physical homogeneity of the wastes by sampling and analyzing a representative portion of generator waste streams on an ongoing annual basis at the national level; and
- Routine analysis of the wastes received at the recycle centers.

Safety-Kleen's customers sign a service document containing the following information:

- Name, address, and EPA ID number of the facility to which the waste is being shipped;
- The customer's name, address, and EPA ID number (if required); and
- The description and amount of Safety-Kleen solvent waste generated.

Each incoming and outgoing shipment is recorded in the facility's operating log. In addition, each sales representative reviews acceptance criteria each time a waste is picked up. In accordance with Safety-Kleen's pre-printed documents, all generators sign a statement with each shipment that there has been no material added to the closed-loop products supplied by Safety-Kleen since the last shipment. Finally, selected environmental reviews may be utilized to guard against the addition of other wastes into the generator's wastes.

If a waste is rejected at the time of service based on the volume or consistency discrepancies, the customer will be given a choice as to whether they will dispose of the waste or will require Safety-Kleen's assistance. If a customer requests Safety-Kleen's assistance, a sample will be drawn using a Coliwasa® tube, and it will be analyzed for flash point, volatile organic compounds, and other parameters to adequately define the constituents (e.g., for halogenated organic compounds, PCB's, flash point, etc.). If the waste is within the acceptable range for wastes permitted for storage, it will be relabeled and manifested, and then managed with the other wastes. If it is not acceptable, it will either be: (a) managed on a 10-day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and shipped directly to a properly permitted reclamation or disposal facility.

7.2.2 Qualitative Waste Analyses

General Inspection Procedures

Prior to acceptance, Safety-Kleen visually inspects each container of waste parts washer solvent at the customer's location. This inspection includes an evaluation of the waste volume, appearance, and consistency. Safety-Kleen' personnel are familiar with the characteristics of all wastes as described in Section 7.1 and managed at their facilities based on known characteristics. These criteria, described below, are used by Safety-Kleen personnel to aid in their visual inspections. These acceptance criteria enable Safety-Kleen to help ensure that the waste being picked up is an acceptable waste and does not contain unacceptable contaminants.

If a particular container of waste does not meet the established acceptance criteria, the Safety-Kleen service representative will reject the container at the customer's place of business. At the customer's request, a sample may be collected and analyzed by Safety-Kleen to determine whether it can be managed by Safety-Kleen. Depending on the source, the waste will be analyzed for parameters related to the suspected source of the

waste. Alternately, the customer may choose to dispose of the material by using another (non-Safety-Kleen) facility.

If the waste is sampled for further analysis, the service representative will take a sample of the waste and then seal the container and label it as hazardous waste. The container is left with the customer pending the results of the laboratory tests. The laboratory testing involves analyzing the suspect waste for compounds related to the suspected source of the waste (e.g., volatile organics, halogenated organics, PCBs, etc.).

If the laboratory analysis reveals that the sampled waste is not contaminated, Safety-Kleen will accept the waste from the customer. If the laboratory confirms that the waste is contaminated, the customer will be given a choice as to whether they will dispose of the waste or will require Safety-Kleen's assistance.

7.2.3 Waste-Specific Criteria

The following is a description of the specific acceptance criteria for each waste stream.

Spent Parts Washer Solvent

Volume and color are the acceptance criteria for determining by visual inspection whether spent parts washer solvent has been contaminated, most significantly volume. Safety-Kleen places clean parts washer solvent in 16, and 30-gallon containers with the customer which, if no additional material has been added to the container, should not hold more than the 16, and 30 gallons of waste, respectively, at the time of waste pick-up since those volumes were equal to the respective virgin product amounts in the containers. If the volume of waste in a given container exceeds the specified level, the Safety-Kleen service representative may sample the waste for laboratory testing as described above, or he/she will reject the waste.

Some larger Safety-Kleen parts washers and some customer-owned machines will require manual pumping of the solvent out of the unit. In these cases, solvent volumes in drums may exceed the values presented above. Volume screening of solvent from these units will be conducted according to the total volume of liquid removed from the unit. If the quantity removed is larger than the quantity provided, the Safety-Kleen service representative may sample the waste for laboratory testing as described above, or he/she will reject the waste.

The spent parts washer solvent is also visually inspected for its color. Unused parts washer solvent (Parts Cleaner 105 and Premium Solvent) has a greenish tint or is clear. The aqueous parts cleaner is also clear. As the solvent is used, it changes color. The specific color which the solvent turns is dependent upon the type of equipment being cleaned. For example, solvent used at automotive shops changes to brown or black, while solvent used by silk screeners will change to the color of the inks (red, blue, pink, green, etc.). If the spent solvent color does not appear to be consistent with the type of equipment being cleaned, the service representative may sample the waste for possible contamination as described above, or he/she will reject the waste.

Immersion Cleaner

The criteria for the inspection of spent immersion cleaner are volume, color, and physical state. Clean immersion cleaner is delivered to the customer in containers. These containers each contain six gallons of immersion cleaner. Spent immersion cleaner is picked up from the customer in the same containers. If no additional material has been added to the spent immersion cleaner, the containers should contain no more than six gallons. If a container contains more than six gallons of waste, a sample may be collected and analyzed for contamination following the procedures described above or waste will be rejected. Unused immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker it becomes, until it is almost black. Therefore, if the spent immersion cleaner does not appear to be amber,

brown, or black, the service representative may sample the waste for possible contamination as described above, or he/she will reject the container of waste.

Dry Cleaner Wastes

Dry cleaner wastes consist of spent filter cartridges, powder residue, and still bottoms, each of which is discussed below.

Spent Filter Cartridges

Spent filter cartridges are placed in containers which hold one to three cartridges. It is readily apparent to the trained service representative whether the items in the containers are filter cartridges. The containers may also contain approximately one inch of liquid which should be either clear or light brownish tint. If the amount of the liquid is greater than approximately one inch or if the liquid is a color other than light brown, the service representative may sample the waste for contamination in accordance with the procedures described above, or he/she will reject the waste.

Powder Residue

The criteria for the acceptance of powder residue are consistency and color, the former being the more significant criterion of the two. A container of powder residue should not contain more than one inch of liquid. The waste should be slightly wet, with a paste-like consistency. If there is too much liquid in the container, the waste may be sampled for contamination in accordance with the procedures described above, or the waste will be rejected. The powder residue is also inspected for color and should appear to be grayish-black. If the residue is not grayish-black in color, the service representative may sample the waste for contamination in accordance with the procedures described above, or he/she will reject the waste.

Still Bottoms

The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is too thin, the waste may be sampled for contamination in accordance with the procedures described above, or it will be rejected. In addition to the consistency, the still

bottom waste is inspected for color. The waste should appear dark brown or black in color. If the waste is a different color, a service representative may sample the waste for contamination in accordance with the procedures described above, or he/she will reject waste.

Paint Wastes

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste, each of which is described below.

Lacquer Thinner Waste

The significant criteria for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in 5-gallon containers. The paint gun cleaning machine operates as a closed system consisting of a 5-gallon container for fresh lacquer thinner and a 5-gallon container for spent lacquer thinner. The closed system is designed such that there should never be a combined volume of more than 7.5 gallons of solvent in the two 5-gallon containers. The fresh solvent container starts with 5 gallons of clean solvent and the spent solvent starts with 2.5 gallons of clean solvent. As the machine is used to spray guns, the fresh solvent is pumped from a tube in the fresh solvent container through the machine and into the spent solvent container. This cleaning/degreasing process will continue until the volume of solvent in the fresh container reaches the 2.5-gallon mark. A tube in the fresh solvent extends half way down the container (i.e., to the 2.5-gallon mark). Any solvent above 2.5 gallons in the fresh solvent container at the time of servicing will be pumped through the machine into the spent solvent container by the Safety-Kleen service representative. Therefore, when the machine is serviced, the spent solvent container will always contain 5 gallons of solvent. If a service representative discovers more than a total of 7.5 gallons of solvent in the two containers or there is an overfill from the spent solvent container, the waste may be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

Paint Waste

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The material should be a "free flowing" liquid, but should not contain a significant amount of water.

Mercury-Containing Lamps and Devices

As part of its protocol for handling mercury-containing lamps and devices destined for recycling, the Branch provides customers with 4-foot and 8-foot boxes which hold up to 39 lamps. Boxes are inspected prior to transport from the customer to the Branch. Boxes containing broken lamps are accepted only if the box is completely sealed and then sealed again with plastic shrink wrap. Surfaces that have come into contact with pieces from a broken lamp will be decontaminated using HgX (sodium thiosulfate and ethylene diaminetetraacetie acid), in accordance with manufacturer's specifications.

7.2.4 Waste Analyses at the Recycle Facility

Analyses performed at the Safety-Kleen recycle facilities are undertaken to safeguard the recycling process and to assure the product quality. In addition, each waste material is sampled and analyzed upon receipt of each waste load as required by the permit and associated waste analysis plan for the receiving recycle center. In order to properly and safely process waste generated by the Branch, the recycle center samples and analyzes each waste load as it is received from the branch. The following tables summarize a typical waste analysis plan at the recycle center facility related to the hazardous materials returned from the Branch:

- Table 7.2-1 Parameters and Rationale for Hazardous Waste Identification
- Table 7.2-2 Parameters and Test Methods
- Table 7.2-3 Methods Use to Sample Hazardous Wastes
- Table 7.2-4 Frequency of Analysis

In addition to the aforementioned analyses, TCLP analyses for all compounds, except pesticides, will be conducted every year on all characteristic hazardous waste steams (example: used parts washer solvent and immersion cleaner #699).

7.3 REQUIRED RECORDS AND REPORTING

7.3.1 Waste Manifests

Appropriate shipping papers/manifests are used, based on the monthly quantity of hazardous waste generated by the customer. Safety-Kleen services all three categories of generators in Florida – Conditionally Exempt Small Quantity Generators (CESQGs), SQGs, and LQGs. CESQGs' spent solvent is removed via a service document and no manifest or Land Disposal Restrictions (LDR) form is required. Appropriate records are kept at the Branch as to the date of waste pick-up, quantity, and other data on the service document. SQGs' spent solvent is shipped under a tolling agreement in Florida, which means that a manifest is not used. An LDR form is completed for each SQG. LQGs' spent solvent is always manifested (if hazardous) and an LDR form completed.

Spent solvent (from each Safety-Kleen customer, regardless of generator status) is brought back to the Branch and dumped in the return/fill station and pumped to the waste solvent tank. This tank contains the spent solvent of many customers and is hazardous. The contents are regularly sent via tanker truck to the recycle center in Lexington, SC. These loads are always manifested and accompanied by a LDR form. Shipments of parts washer solvent dumpster mud are also manifested accordingly. Required records are kept at the Branch and the recycle center in accordance with regulatory timeframes.

In accordance with 40 CFR 264.71 through 77, Safety-Kleen will ensure that:

1. Customers who are required to provide a manifest do so;
2. The manifests are prepared and signed properly; and
3. Copies are distributed and kept on file, as required.

In addition, discrepancies must be remediated in accordance with 40 CFR 264.72 and unmanifested wastes will be reported as described under 40 CFR 264.76.

7.3.2 Required Notices

If Safety-Kleen arranges to receive hazardous waste from a foreign source, the Regional Administrator must be notified in writing at least four weeks in advance of the date the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required. Safety-Kleen informs its customers in writing (i.e., on each service document) that the facility has the appropriate permit(s) for, and will accept the waste the generator is shipping. Safety-Kleen keeps a copy of this written notice as part of the operating record.

Before transferring ownership or operation of this facility during its operating life, Safety-Kleen will notify the new owner or operator in writing of the requirements of Part 264 and Part 270 of Chapter 40 in the Code of Federal Regulations.

Biennial reports required by Chapter 62-730.180(4) FAC, will be prepared and submitted by Safety-Kleen, and these records will also be available at the facility for review. The biennial report will be submitted to the Regional Administrator and/or FDEP by March 1 during each even year (1990 being the first year) on EPA form 8700-13B. The report will cover facility activities during the previous calendar years and will include:

- The EPA identification number, and address of the facility;
- The calendar years covered by the report;
- The method of treatment, storage, and disposal for each hazardous waste; and
- A certification signed by the owner or operator of the facility or the authorized representative.

7.3.3 Operating Record

An operating record which contains the information required under 40 CFR 264.73 is maintained and all records and logs are available at the facility, in accordance with 40 CRR 264.74.

The following information will be maintained in writing in the operation record for the facility:

- A description and quantity of each hazardous waste received;
- The date and storage method for such hazardous waste;
- The location of each hazardous waste stored within the facility;
- Records and results of waste analyses performed;
- Summary reports and details of all incidents that require implementation of the contingency plan;
- Monitoring, testing, or analytical data, and corrective action where required by Subpart F and other applicable sections of 40 CFR 264;
- All closure cost estimates under 40 CFR 264.142 and all contingent post-closure cost estimates under 40 CFR 264.144;
- Records of quantities and date of placement for each shipment of hazardous waste placed in land disposal units under an extension to the effective date of any land disposal restriction granted; and
- For any restricted waste generated that can be land disposed without further treatment, and is sent to a land disposal facility, a notice and certification will be sent to the treatment, storage, or land disposal facility with the waste. The notice will state that the waste meets the applicable treatment standards set forth in Subpart D of 40 CFR 268 and applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). The notice will include the following information:
    1. EPA Hazardous Waste Number; and
    2. The corresponding treatment standards and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).

Further, the LDR certification will be signed by an authorized representative and will state the following:

> *I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.*

Section 264.74 requires that all records, including plans, must be furnished upon request to duly designated representative of the Regional Administrator, and this requirement will be honored. A copy of all records of waste disposal locations and quantities will be submitted to the Regional Administrator and/or FDEP upon closure of the facility, if applicable.

As a registered transporter and storage facility for mercury-containing lamps and devices destined for recycling, the Branch complies with the record keeping requirements of FAC 62-737.

7.3.4 Land Ban Notification/Certification Forms

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

1. Special forms for each regularly handled wastes types (e.g., parts washer solvent, immersion cleaner, and percholoroethylene); or
2. A general form that must be completed for unique or nonstandard waste streams.

The notice is required paperwork for the streams handled by Safety-Kleen. When a shipment with the notice is received, the notice is kept in the files of the receiving facility with the manifest or with the pre-print if a manifest is not used.