

July 30, 2012



Mr. Merlin D. Russell Jr.
Professional Geologist II
Hazardous Waste Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd., MS #4560
Tallahassee, FL 32399-2400

Fedex Next Day Service

RE: Safety-Kleen Systems, Inc. Boynton Beach; FLD 984 167 791; Operating
Permit No. 49625/HO/007; Palm Beach County
First Notice of Deficiencies Dated June 20, 2012

Dear Mr. Russell:

Safety-Kleen (SK) has prepared this letter to respond to the permit application first notice of deficiencies letter from the Department dated June 20, 2012. We have identified each of the Departments comments in bold, followed by our response. Revised pages of the application are also enclosed with this submittal.

FDEP Comments #1: Part I.D.3: A Process Design Capacity column with units of measure is required (include as you did with your SK Tampa Part B).

SK Response: Safety-Kleen has revised the Part I.D.3 table to include a Process Design Capacity column.

FDEP Comments #2: Part I, D. Operating Information, Page 3: Additional information needs to be included for the 10-day hazardous waste transfer area. The Part B must include the operation of this facility in the application. The Part B must describe how the 10-day wastes are kept separate from the other material being stored at the facility. It must also make clear that no 10-day wastes are being manifested to the Boynton Beach facility and are only in transit to other TSD facilities.

SK Response: Safety-Kleen has revised Part I, D. Operating Information to include the above required information.

FDEP Comments #3: Part I, D. Operating Information, Page 4, first paragraph: The FDEP used antifreeze document has been recently updated (May, 2012, http://www.dep.state.fl.us/waste/quick_topics/publications/shw/hazardous/Antifreeze-Guidance_2012.pdf). You should update your Part B using this edition throughout the application.

SK Response: Safety-Kleen has revised Part, I, D. Operating Information to reference the above update to used antifreeze guidance throughout the Part B application.

SAFETY-KLEEN CORP.

5610 ALPHA DRIVE BOYNTON BEACH, FL 33426



FDEP Comments #4: (Page 9, last paragraph) There is a discussion of management of mercury lamps and devices. Somewhere here there should probably be a reference to the training requirements of Rule 62-737.400, F.A.C.

SK Response: Safety-Kleen has revised the above paragraph to reference the training requirements of Rule 62-737.400, F.A.C.

FDEP Comments #5: Part II, A. General, 2. Financial Assurance for Closure: The facility has capacity for 35,000 gallons of used oil, at least 5,000+ gallons of oily wastewater, and used oil filters. By definition (62-710.201(3), F.A.C.), you are a used oil processor. A used oil processor requires a used oil permit which is combined with your hazardous waste permit. Subsection 62-710.800(6), F.A.C., requires you to provide financial assurance for closure costs associated with used oil processing activities. While your current closure costs for hazardous waste include the decontamination of the tanks and testing for environmental contamination, they do not include costs for the disposal of the used oil, oily wastewater, and oil filters. The disposal costs for these items needs to be accounted for in your closure cost estimates.

SK Response: 62-710.201(3), F.A.C. defines a processor as “any person processing used oil. The term also includes any transfer facility that stores used oil for longer than 35 days at a time, any used oil marketer who receives used oil from transporters or who has at least 25,000 gallons of used oil storage capacity, and any person who blends used oil with on-specification used oil fuel or with virgin petroleum products for the purpose of producing on-specification used oil fuel”. The Safety-Kleen Boynton Beach facility does not process used oil, store used oil for longer than 35 days, is not a used oil marketer, and does not blend used oil with on-specification used oil fuel or with virgin petroleum products for the purpose of producing on-specification used oil fuel. Therefore, it our contention that the facility does not meet the definition of a used oil processor in the above referenced rule (62-710.201(3), F.A.C. and the closure costs associated with a used oil processor do not apply to the facility.

FDEP Comments #6.1: In accordance with 40 CFR 270.32(b)(2), we request that the page containing Safety-Kleen emergency coordinators be provided to the adjacent school for health and safety issues. We also request that Safety-Kleen enter into an agreement with the school and school board concerning a notification process in the event that the Safety-Kleen facility requires evacuation. Safety-Kleen should retain documentation in the operating record that the information was provided to both entities.

SK Response: Safety-Kleen will contact the Boynton Beach Community High School and Palm Beach County School district in order to provide the requested information to both entities. In addition SK will discuss and make a formal agreement that satisfies Safety-Kleen, Boynton Beach Community High School, and the Palm Beach County School District in the event that the SK Boynton Beach facility requires evacuation. This information will be provided to the Department when an agreement is reached.

FDEP Comments #6.2: Page 25, in the "Equipment" paragraph, the Department suggests language to the effect that emergency equipment that is cleaned should be deemed fit for use after a response (264.56(h)(2)).

SK Response: Safety-Kleen has revised page 25 to include the above language regarding emergency equipment.

FDEP Comments #6.3: Page 27 indicates more than a 20' distance for the tank farm from the property line but that the flammable storage area is 50' or more from the property line. Page 69, first paragraph also states that there is a 50 ft. setback from the property line for storage of ignitable waste. It is unclear why the "...more than 20' from the property line." is mentioned here.

SK Response: The reference to "...more than 20 ft. from the property line" is mentioned per the NFPA (National Fire Protection Association) codes as required by 40 CFR Part 264.198(b). Safety-Kleen has revised the above pages to indicate this regulatory citation as well as clarify the pages 27 & 69 to indicate the 50' setback refers to containerized/ignitable waste per 40 CFR Part 264.176.

FDEP Comments #6.4: The Department recommends that a copy of the CP be maintained at a nearby but offsite location in the event that onsite access to the CP is not possible.

SK Response: A copy of the CP is maintained at the Boynton Beach Fire Station #5, which is approximately 0.5 miles north of the facility. In addition, the facility manager and EHS manager have electronic copies of the document available to them.

FDEP Comments #6.5: The Department recommends the option of electronic copies, instead of or in addition to hard copies, be made available for local authorities/first responders.

SK Response: Once the permit and CP are finalized Safety-Kleen will attempt to make arrangements with local authorities/first responders to submit electronic copies of the CP.

FDEP Comments #6.6: The mercury cleanup kits mentioned in the list of emergency equipment at the facility should also be located on board your trucks. If so, your Part B should say so.

SK Response: Safety-Kleen will order and place mercury cleanup kits on its' route trucks that handle this material and revise the Part B to indicate this.

FDEP Comments #7.1: On page 64, we suggest adding the following to the information maintained as part of the operation record:

- a. Training records
- b. Inspection reports
- c. Waste minimization certifications
- d. Closure plan
- e. Corrective Action documents

SK Response: Safety-Kleen has revised page 65 to include the above information being maintained as part of the operation record.

FDEP Comments #7.2: Table 7.1-1: The Notes at the bottom should identify the double and triple asterisks ("**" and "***) found in the table.

SK Response: Safety-Kleen has revised Table 7.1-1 to identify the double and triple asterisks found in the table.

FDEP Comments #7.3: Table 7.1-2: the superscript "a" next to "Parameter" in the second column should be identified. Also, MIBK should be included for a parameter of the paint waste (for consistency with page 51).

SK Response: Safety-Kleen has revised Table 7.2-1 to include MIBK for a parameter of the paint waste and removed the superscript "a" next to "Parameter" in the second column.

FDEP Comments #7.4: The WAP should describe the process by which Safety-Kleen determines a representative sample for its annual re-characterization process.

SK Response: Safety-Kleen has revised the WAP to describe the process by which it determines a representative sample for its annual re-characterization process.

FDEP Comments #8: Part II, page 69 states that the solvents are typically compatible and suited for bulking but in some isolated instances, waste segregation may be needed. Describe the segregation procedures and management of these wastes under these circumstances.

SK Response: If a situation arose that required waste segregation then an area of the container storage area would be cleared and taped off to ensure no other material is being stored within 20 ft. or could come into contact with the material in question. The material would then be properly managed and shipped according to its characteristics.

FDEP Comments #9: In the May 21, 2012 written assessment of the tank system's structural integrity and suitability for handling hazardous waste, as required under 40 CFR Parts 264.191 and 264.192, there is comment that the top manway flange is bent and damaged, resulting in a gap between the flange and the cover. Please describe the efforts taken to remedy this condition.

SK Response: Safety-Kleen's branch engineering department has reviewed the May 21, 2012 tank assessment regarding the bent flange and determined that it does not have an impact on the performance of the tank. The top manway cover has been reinstalled with long-bolts to allow it to perform as an emergency vent as designed.

FDEP Comments #10: The Part B is unclear about secondary containment for ancillary equipment. Although the application asserts compliance with 40 CFR Part 264.193 requirements, it is unclear whether the ancillary equipment contains secondary containment or if the ancillary equipment is above ground and visually inspected on a daily basis. Ancillary equipment must be provided with secondary

containment (e.g., trench, jacketing, double-walled piping) that meets the requirements of paragraphs (b) and (c) of this section except for (264.193(f)):

1. Aboveground piping (exclusive of flanges, joints, valves, and other connections) that are visually inspected for leaks on a daily basis (264.193(f)(1));
2. Welded flanges, welded joints, and welded connections, that are visually inspected for leaks on a daily basis (264.193(f)(2));
3. Sealless or magnetic coupling pumps and sealless valves, that are visually inspected for leaks on a daily basis (264.193(f)(3)); and
4. Pressurized aboveground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown devices, loss of pressure actuated shut-off devices) that are visually inspected for leaks on a daily basis (264.193(f)(4)).

There are no figures or text illustrating or discussing the layout of the ancillary equipment for the tank system. Information should be submitted that illustrates the layout of the piping system between the fill/return stations and the hazardous waste tank. Construction material and size of the pipes should be provided. Location of pumps should be provided. In part, the details of the ancillary equipment are needed in order to estimate costs for flushing and removing the pipelines at closure.

SK Response: All piping from the return/fill station to the hazardous waste solvent tank at the Safety-Kleen Boynton Beach facility is above ground and is inspected on a daily basis. The daily inspections are noted on Figure 9.4-1, page #1 in the last column under "Rigid piping and supporters". Figure 11.1-1 illustrates the layout of the ancillary equipment and piping system from the return/fill station to the hazardous waste solvent tank including the location of pumps. The CCE includes line items to decontaminate piping and appurtenant equipment on page #3 under Storage Tank Decontamination and Removal.

FDEP Comments #13: In general, this closure plan (CP) lacks some of the details normally included in a closure plan, primarily because closure is not anticipated for some time and therefore details are unknown. However, page 89 does reference a "formal closure plan." In discussions with you (Jeff Curtis) on May 30, 2012, we agreed that when Safety-Kleen decides to formally close, you would notify the Department and at that time, work with DEP to update the closure plan using the current requirements and FDEP guidance documents. The contents of this paragraph should be included within your closure plan.

SK Response: A statement has been added to page 87 regarding the above notification to the FDEP.

FDEP Comments #14: Throughout the CP, decontamination waters are proposed to be compared to GCTLs. Although acceptable, comparison to GCTLs is not their intended application. The CP can be changed to indicate that decontamination will be done to meet FDEP's guidance at the time of closure. This is a detail that can be worked out later.

SK Response: Safety-Kleen agrees with the Department that this detail can be worked out at a later date. Revisions can be made at that time to the CP to meet FDEP's guidance at the time of closure.

FDEP Comments #15: The maximum inventory is not identified in the CP although it its 15,000 gal for the tank and 6,912 gallons for containers according to other parts of the application (e.g., Table 7.1-1 and page 82).

SK Response: The maximum inventory for the tank and containers is listed on page 88.

FDEP Comments #16: This Closure Plan should state that sampling and analyses will be done in accordance with FDEP Standard Operating Procedures (SOPs) located at <http://www.dep.state.fl.us/water/sas/sop.index.htm> and the requirements of a Sampling and Analysis Plan (SAP) per subsection 62-730.225(3), F.A.C.

SK Response: Safety-Kleen has revised the Closure Plan (page 93) to include the above referenced items.

FDEP Comments #17: (92/bullet 2): Soil sample concentrations must be compared to Soil Cleanup Target Levels (SCTLs) in Chapter 62-777, F.A.C. Concentrations should be compared to both the residential and industrial/commercial SCTLs while evaluating closure and/or postclosure options.

SK Response: Safety-Kleen has revised 92/bullet 2 to include the above referenced language.

FDEP Comments #18: (93/bullet 1): If the debris passes TCLP, there may be other options for re-use or disposal. The concrete may qualify as clean debris (Subsection 62-701.200(15), F.A.C.). If not, management options will be available in accordance with solid waste rules and/or guidance.

SK Response: If, at the time of closure, the debris passes TCLP Safety-Kleen will evaluate all options for the best possible disposal method for this material in accordance with all applicable regulations.

FDEP Comments #19: (93/bullet 3): Some commercial sources of backfill provide analytical data that may be used in lieu of (presumably) your own sampling and analysis (although the CP does not specify that SK will do the sampling).

SK Response: Safety-Kleen has revised 93/bullet 3 to state that SK will do the sampling. If a commercial source of backfill with supporting analytical if found at the time of closure we will evaluate that option.

FDEP Comments #20: Some of the SWMU identification/nomenclature is inconsistent. It is important to use consistent nomenclature with the assigned SWMU number. We are working with you to draft an RFA Addendum. This document, once finalized, can be referenced or included in the application to meet the permit application requirements.

SK Response: Safety-Kleen has revised the SWMU identification/nomenclature to be consistent with the nomenclature with the assigned SWMU number.

FDEP Comments #21: Figure Part II-Q: Typo of SWMU 13: Should probably be "Cont. Loading Dock". Also, the figure will need to be updated to be consistent with the RFA Addendum currently being drafted.

SK Response: Safety-Kleen is in the process of having Figure Part II-Q revised to be consistent with the RFA Addendum currently being drafted. This figure revision will be forwarded to the Department as soon as it is completed.

FDEP Comments #22: Tables 11.2-1 and 11.2-2: Both of these tables reference Table 11.2-3, but there is not a Table 11.2-3 in the application. Also, Table 11.2-2 references Control Option. What is this control option?


SK Response: Table 11.2-3 was mistakenly left out of the submitted application. The table is included with this letter.

FDEP Comments #23: Appendix F is entitled EPA Region 4 RFA but it contains Safety-Kleen's HSWA permit renewal letter dated June 11, 2001. The Department suggests keeping this letter and including the August 1991 RFA (it is short) in this attachment.

SK Response: Safety-Kleen will keep the above referenced letter along with the August 1991 RFA in Appendix F.

The enclosed replacement pages are to be inserted into the initial permit application. If you have any questions regarding this submittal please contact me at (561) 523-4719.

Best regards,



Jeff Curtis
Safety-Kleen EHS Manager
5610 Alpha Drive
Boynton Beach, FL 33426
Enclosure(s)

cc: Karen Kantor, FDEP/Southeast District
Kathy Winston, FDEP/Southeast District

PART I**D. Operating Information**

3.

Waste Type	Process Design Capacity (Gallons)	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent	15,000	S01* S02**	848	D001 and D-codes listed in Note below
Branch-Generated Liquids Solids (Debris)	6,912	S01*	17	D001 and D-codes listed in Note below; F001, F002, F003, F004, F005
Dumpster Sediment	6,912	S01*	Included above	D001 and D-codes listed in note below
Tank Bottoms	6,912	S01*	Included above	D001 and D-codes listed in note below
Used Immersion Cleaner (IC 699)	6,912	S01*	28	D-codes listed in note below
Dry Cleaning Waste (Perchloroethylene)	6,912	S01*	290	F002 and D-codes listed in note below
Dry Cleaning Waste (Non-perchloroethylene)	6,912	S01*	Included above	D-codes listed in note below
Paint Wastes	6,912	S01*	46	D001, F003, F005 and D-codes listed in note below
Fluid Recovery Service (FRS)	13,200	S01***	220	Transfer wastes-waste codes assigned by generator
Mercury-Containing Lamps/Devices	N/A	N/A***	Less than 2.2	N/A-handled as non-hazardous transfer wastes

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

* This waste will be stored in containers in the building container storage area. The maximum capacity in the container storage area for hazardous waste and product is 29,400 gallons, with 6,912 gallons being waste

** The spent parts washer solvent storage tank has a capacity of 15,000 gallons and may be filled to 14,250 gallons

*** This waste will be held for transfer in containers in the transfer area

Safety-Kleen provides a dry cleaning waste reclamation service where containers of dry cleaning wastes are collected and stored temporarily at the Branch before shipment to the TSDF's for reclamation and processing. All dry cleaning wastes remain in their original containers while at the Boynton Beach facility.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and stored temporarily at the Branch before shipment to the permitted Safety-Kleen TSDF for reclamation and processing. Paint wastes are managed as permitted wastes. All paint wastes remain in their original containers while at the Boynton Beach facility.

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Branch. Under this program, other types of waste are collected by the Branch and sent out to the recycle centers. The FRS wastes are managed as transfer wastes. Examples of the types of wastes that may be received from FRS customers include:

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, 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 and lacquer thinners.
- Other hazardous and non-hazardous halogenated and non-halogenated wastes.

10-Day Transfer Storage Area (FRS)

The 10-day transfer storage area is approximately 31' x 35'6" and is located in the main warehouse on the east side of the container storage area. Signage clearly marks this area as 10-day storage and it is separate from the permitted container storage area. All containers stored in the 10-day transfer area are manifested and in transit to other permitted facilities. Safety-Kleen Boynton Beach is not the designated facility for wastes stored in the 10-day transfer area.

In 1990 Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. This service is offered in conjunction with Safety-Kleen's used oil collection service. All used antifreeze collected and managed by Safety-Kleen within Florida is recycled. The trucks used to collect and transport waste ethylene glycol are the same trucks used for collection and transport of used oil. At the customer locations, Safety-Kleen pumps used antifreeze and transports the material to the Branch for off-loading into a tank for storage. The ethylene glycol/used oil mixture is transferred to the Safety-Kleen re-refinery in East Chicago, Indiana, where the ethylene glycol is extracted from the oil by distillation. After separation, the ethylene glycol is shipped to a glycol refinery for additional purification into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's *Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012.

In 1996, the Branch became registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the regulations of Florida Administrative Code (FAC) 62-737.400. As a registered storage facility, the Branch can store up to 2,000 Kilograms of lamps/devices for a period of up to 180 days. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as non-hazardous transfer wastes. The boxes are stored at the Branch in a designated area that is labeled in accordance with FAC 62-737.400(5)(b), and is partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic.

Containers of hazardous waste are picked up at customer locations and transported back to the Branch in route trucks. Each route truck is equipped with a hand-truck and electric lift gate for movement of containers. Upon arrival at the Branch, containers are placed on pallets and moved by way of forklift to the appropriate areas. Containers of used parts

washer solvent are unloaded at the return/fill area and are dumped by hand into the wet dumpster for transfer via piping to the hazardous waste used solvent tank. Forklifts are used for loading containerized hazardous waste containers onto trucks for transport to Safety-Kleen TSDF's.

Safety-Kleen constructed the Boynton Beach Branch with the intent that it will be a long-term facility for the distribution of Safety-Kleen products. No on-site disposal activity occurs at the facility and, hence no disposal capacity will be exhausted that will necessitate closure of the facility. Based on current business and facility conditions, the Boynton Beach facility is expected to remain in operation at least until the year 2035.

Parts washer solvents are transported in covered containers between the Branch and customers. Upon returning to the Branch, the used parts washer solvent is transferred from the containers into a wet dumpster (solvent return receptacle) in which coarse solids in the parts washer solvents are retained. Used parts washer solvent from the wet dumpster flows into a 15,000-gallon aboveground tank for storage. Hazardous waste washer solvent is picked up regularly by a bulk tank truck from a Safety-Kleen TSDF, which at the same time delivers clean parts washer solvent. The sludge in the wet dumpster is regularly cleaned out, containerized, and stored as Branch generated waste in the flammable permitted waste storage area for later shipment to a permitted Safety-Kleen TSDF for reclamation or disposal.

The immersion cleaner remains in a covered container at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the Branch.

Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers. Dry cleaning wastes handled by Safety-Kleen consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms, all of which fall into the categories of either perchloroethylene-based waste or naphtha-based waste. The dry cleaning wastes are packaged on the customer's premises in containers.

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. The used antifreeze/oil mixture is transported from the customer site to the branch, or Bidsite for storage until transport to the SK East Chicago, Indiana re-refinery. There the used antifreeze is separated using distillation and sent to a recycling facility for reprocessing into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities, dated May 22, 2012.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and are stored at the south building flammable permitted storage area. Paint wastes are received at the Branch on manifests which are terminated at that point. These wastes are then re-manifested and shipped to a permitted Safety-Kleen TSDF, and the regenerated solvent may be distributed to Safety-Kleen customers for use as a product.

The FRS wastes are packaged in polyethylene or steel containers which are not opened until they reach a permitted Safety-Kleen TSDF. The FRS wastes are transfer wastes and may be stored onsite for up to 10 days. The FRS wastes may also undergo branch-to-branch or truck-to-truck transfer. This transfer will occur at the return/fill station inside secondary containment.

These wastes exhibit essentially the same biological, physical, and chemical properties as the fresh product. The waste materials are basically fresh products with impurities of dirt and metals, and may also be contaminated with other solvents. Material Safety Data Sheets (MSDSs) for each hazardous material are available at the Branch and on demand by fax through a company-owned MSDS information service, which has 24-hour phone or fax access.

The Branch is registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the requirements of Florida Administrative Code (FAC) 62-737.400, including all training requirements. Route trucks handling these materials are equipped with mercury cleanup kits. As a registered storage facility, the Branch can store up to 2,000 kilograms of lamps/devices for a period of up to 180 days. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as nonhazardous transfer wastes. The boxes are stored at the Branch in a designated area within the transfer waste storage area. These materials are labeled in accordance with FAC 62-737.400(5)(b), and are partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic.

Inspection of Security Equipment

The Branch Manager or designee, using the Weekly Inspection Log (Figure 5.2-1 or similar), inspects the security features of the facility weekly (e.g., gates and locks), looking for any evidence of sticking, corrosion, or unusual activity. The facility fence will be checked weekly for deterioration, gaps, and broken wire ties.

Inspection of Waste Management Facilities

The purpose of the inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of hazardous waste management and other material management facilities to ensure proper operation and maintain compliance. Table 5.2-1 provides an Inspection Schedule.

The Branch Manager or designee is responsible for carrying out the inspections of all hazardous waste management facilities in accordance with the following procedure and schedule.

Daily inspections of aboveground tanks will include the following:

- Note volume in tank.
- Observe tank exterior for loose anchoring, wet spots, leaks.
- Check the automatic high level alarm. In addition, measure the depth of used solvent in the tanks to confirm the proper functioning of the automatic alarm system and to determine unexpected deviations in tank measuring data, or a sudden drop in liquid level, which may indicate leakage.
- Inspect secondary containment walls and piping.

Concrete Surfaces/Containment Area

- Concrete surfaces/containment areas will be cleaned with a detergent solution and then rinsed with hot water. The rinsate will be collected via wet vacuums and placed in containers. Visual inspection will be used to determine the success of the decontamination procedure.
- The intent of the surface decontamination is to prevent current or future releases of materials to the environment. Vigorous cleaning with detergent is sufficient to prevent releases to the environment during normal operations. Potential for hazards from residual materials to future occupants of the facility are addressed in the closure plans for the facility and the decontamination procedures incorporated therein.

Equipment

The equipment used to clean the area includes mops, pails, scrub brushes, and a wet/dry vacuum. Equipment which is considered reusable (i.e., pails, wet/dry vacuum, hoses) will be washed with detergent, and wash water and rinsate will be collected for proper disposal. All non-reusable equipment and/or equipment which is not capable of being decontaminated will be containerized and disposed of as hazardous waste. Equipment used in a response will be deemed fit for use after being used in any response.

Wash Water and Rinsate

If the rinsate or other wastes generated in the clean-up process is determined to be hazardous, it will be properly disposed of as a hazardous waste; otherwise, the material will be disposed of as an industrial waste. It should be noted that wash water and rinsate will not be allowed to drain to soil or surface waters.

FIRE CONTROL PROCEDURES

In the event of a fire at the facility, the following activities will be executed:

- Call the Fire Department (page iii). (Note: Center aisles are available in the container storage area to permit fire department personnel to pass freely with fire fighting equipment.)
- Act quickly with fire extinguishers to put out the fire before it spreads.
- Call the Police Department (page iii) to maintain traffic and on-lookers.
- Call the local hospital (page iii) to notify the type and extent of injuries, if any.

Areas within the Branch building (offices, return/fill station, container storage area) and the storage building have automatic fire fighting sprinkler systems (Figure 5.9-1). In addition, building walls have a four-hour fire rating.

Ignitable Wastes

All wastes and products are kept away from ignition sources--Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., Outside front of facility). The parts washer solvent and paint waste handling areas are separated from the office area to minimize the potential for a fire to spread or injury to personnel to occur.

The tank farm is more than 20 feet from the property line as required in 40 CFR Part 264.198(b). Likewise, the containerized flammable storage area is 50 feet or more from the property line per 40 CFR Part 264.176. Both of these distances meet the NFPA code for storage of ignitable materials.

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/used oil mixture to the branch for off-loading into a tank for storage. The comingled material is sent to the SK East Chicago re- refinery where the glycol is separated by distillation. The glycol is then sent to a recycler for processing into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's *Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. 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.

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 is managed as a 10-day transfer waste and is stored in the non-flammable container storage area. 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.

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 from customers in containers and will be accumulated in the 15,000-gallon used solvent storage tank via the return/fill station. The used aqueous parts washer solvent may, or

Part II. General

6. WASTE ANALYSIS PLAN

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 ensure 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 safeguard 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 by a certified outside laboratory 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, such as periodic inspections of customer solvent containers by the Environmental manager and Branch management, 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.

Annual Re-Characterization Program

Every year Safety-Kleen randomly samples containers of re-occurring industry specific waste that it collects and manages on a daily basis (i.e., "Core Wastes"). Specifically these include: SK generated branch contaminated debris, solvent tank bottoms; and, customer spent aqueous brake cleaner, immersion cleaner, parts washer solvent, paint related waste, and dry cleaning waste (Perc/Naptha). Samples are taken with appropriate instruments depending on the nature of the waste stream (ex: liquids sampled with Coliwasa). These samples are sent to an independent accredited laboratory for analyses. The "statistically significant" waste codes derived from this analysis are the codes that SK expects to find from typical customers. SK provides these codes and information on AR process to generators so they can use their site specific information to determine the applicability of these codes to their wastes.

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's personnel are familiar with the characteristics of all wastes described and managed at their facilities based on known characteristics. These criteria, described below, are used by Safety-

- 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).
- Training records, inspections reports, waste minimization certifications, closure plan, and Corrective Action documents.

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.

Part II General

B. CONTAINERS

CONTAINMENT SYSTEM

The container storage areas shown in Figure 8.1-1 occupies a portion of the building area which has a sloped concrete floor and a collection trench to form a spill containment system. The system is maintained free of cracks. Spills are removed by a hand-held portable electric pump (the coms pump), wet-dry vacuum cleaner, or sorbent materials. The capacities of the containment system are designed to be greater than 10 percent of the total liquid storage capacity in each drum storage area. Since the characteristics of the stored wastes are known, no analyses are performed for the materials collected from the containment area. All collected materials are sent to a permitted recycling or reclamation facility.

Only in the event that a spill were to exceed the containment capacity would spilled wastes be able to extend beyond the containment area. Only six openings (doorways) exist in the container storage area. Four of these lead to other containment area (i.e., the return/fill station and the enclosed concrete dock (Figure 8.1-1)). The other two doorways are located on the east side of the container storage area behind a locked chain link fence. Due to the volume of containment available and the configuration of the container containment area, it is highly unlikely that any spill would extend beyond this area.

The containment volume is composed of the sloped concrete floor and the collection trench. The total containment volume is 2,972 gallons. Therefore, the maximum storage capacity is 29,720 gallons. The types and number of each container may vary; however, total volume of product and waste stored will not exceed the maximum volume of 29,720 gallons. The estimated maximum storage volume of waste is 6,912 gallons. Containment calculations are included with a container storage area integrity assessment provided in Appendix C.

All containers are transported, moved, and stored carefully in an upright position. Containers are palletized whenever possible to facilitate shipping and storage. Pallets may be stacked up to seven feet, or two high (whichever is higher), while in storage. This will prevent the containers from contacting standing liquid while they are in storage. Pallets may be shipped up to three high during transportation. The containers will be arranged so that a two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling.

INCOMPATIBLE, IGNITABLE, AND REACTIVE WASTE MANAGEMENT

All materials are managed in accordance with the local fire protection code and fire department recommendations. All containerized ignitable wastes are stored at least 50 feet from the property line.

The facility does not routinely manage unwashed containers that may previously have held materials that would be incompatible with wastes stored at the facility. Also, the used parts washer solvents and used aqueous parts washer solvents consist of materials that are compatible and suitable for bulking.

Procedure for Managing Waste Types

The solvents stored at this facility are typically compatible with each other and with other materials handled at this facility. In some isolated instances, special waste segregation procedures may be necessary at this facility. Wastes are stored primarily in polyethylene and steel containers. Immersion cleaner, dry cleaning, paint waste, and FRS waste containers are never opened at the Branch. Overpack containers are used for the management of containers whose integrity has been compromised. For ease of inventory control and product integrity, separation and grouping of both used and unused solvents is a standard practice at the Branch. All containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and

of a spill, or in as timely a manner as possible, to prevent harm to human health and the environment.

TANK SYSTEM SECONDARY CONAINMENT

Tank Containment

All tanks are aboveground, underlain by a 71' x 32'4" x 6 concrete slab, surrounded by a 36" concrete dike and are in an enclosed building. No surface run-on or precipitation will contact the wastes stored in the tank, and no run-off collection and management system is required. The layout of the tank farm is shown in Figure 9.2-1. Containment calculations are provided in Appendix C.

The containment system in the tank farm has been coated with Sikagard® 62 or its' equivalent, and is free of cracks and is sufficiently impervious to prevent seepage into and through the concrete. Concrete is fully compatible with the waste stored. If the sealant is found to be worn or deteriorated such that repairs are warranted, the sealant will be repaired in accordance with the manufacturers' specifications.

Return/Fill Containment

The return/fill station is located between the inside the center portion of the main building. The floor is sloped to a containment trench located in the center of the return/fill station. The entire area is coated with a chemical resistant coating. The barrel washers are on a raised grating which measures 20' x 53'7" (Figure 9.3-1). These dumpsters are not intended for storage but can hold a maximum of 550 gallons (275 gallons per dumpster).

The area is designed such that the route trucks can be backed into the building and the garage doors shut so that no precipitation can get into the return/fill station containment.

containment system, the actions identified herein will be undertaken.

Immediate Response

All waste flow to the tank system in question will be ceased immediately. An inspection will be undertaken to identify the cause of the release. Waste flow to the tank system will not resume until the tank system has been inspected, repaired, and declared fit for use. In order to prevent further release, or to allow inspection and a repair of the system, it may be necessary to remove the waste from the tank system. This waste removal will occur within 24 hours after detection of the leak, or at the earliest practicable time. All material released to the secondary containment area will be removed within 24 hours, or in as timely a manner as possible, to prevent harm to human health and the environment. Every reasonable effort will be made to prevent migration of the release to soils or surface water. If necessary, visible contamination of surface water and soil will be removed and properly disposed of.

Notifications

If a spill is less than one pound and is immediately contained and cleaned up, no notifications are required. All other releases require notification as described in the Contingency Plan.

Subsequent Reporting

Within 15 days of detection of a release to the environment, a report must be submitted to the Regional Administrator and FDEP. The report must contain the following information:

1. Likely route of migration of the release.
2. Characteristics of the surrounding soil (soil composition, geology, hydrogeology, climate).
3. Results of any monitoring or sampling conducted in connection with the release.
If sampling has occurred and sampling results are not available within 30 days, the results must be submitted as soon as available.
4. Proximity to downgradient drinking water, surface water, and populated areas.
5. Description of response actions taken or planned.

Corrective Action

Any discrepancies or deficiencies found during routine inspections will be recorded in the inspection log and brought to the attention of a supervisor. At this time an evaluation of seriousness of the problem will be noted and a decision made if the situation requires immediate action or the problem can be handled as routine maintenance. The evaluation of the seriousness of the problem will be recorded in the facility's inspection log. If the problem poses a threat to human health of the environment, action will be taken immediately. The Branch Manager has the overall responsibility for resolving any discrepancies found during the routine inspection.

Part II

K. CLOSURE PLAN

Safety-Kleen constructed the Boynton Beach Branch with the intent that it will be a long-term facility for the distribution of Safety-Kleen products. No on site disposal activity occurs at the facility and, hence no disposal capacity will be exhausted that will necessitate closure of the facility. Based on current business and facility conditions, the Boynton Beach facility is expected to remain in operation at least until the year 2035. In the event that some presently unforeseen circumstance(s) would result in the discontinuance of operations and permanent closure or sale of the facility, this closure plan identifies the steps necessary to close the facility at any point during its intended life. This plan should be applied to the tanks system, container storage areas, and equipment used by the facility for hazardous waste management to accomplish the closure performance standard of 40 CFR 264.111. It is intended that all closures will be complete and final with removal of waste and decontamination of the facility and associated equipment. This will eliminate the need for maintenance after closure and the possibility of escape of hazardous waste constituents into the environment.

Because closure is not anticipated for some time Safety-Kleen agrees to notify the Department when this decision is made to work with DEP to update the closure plan using the current requirements and FDEP guidance documents.

Concrete Containment System

- Final disposition of the concrete containment system within which the waste tank is located will depend in part upon the presence or absence of underlying soil contamination. To make that determination, the upper six inches of soil immediately below the concrete slab will be sampled at the locations, as follows: under the waste tank, at the containment system sumps, beneath the most prominent of any cracks observed in the slab, and under the tanker connections.
- These sample locations may be adjusted as actual field conditions warrant, but a minimum of three samples will be retrieved. These samples will be analyzed by EPA Method 6010 for the eight RCRA metals and nickel, and for volatile and semivolatile organics by EPA Methods 8015, 8260, and 8270. Soil sample concentrations will be compared to Soil Cleanup Target Levels in Chapter 62-777, F.A.C. and both residential and industrial/commercial SCTLs while evaluating closure and/or postclosure options.
- The perimeter walls and foundation slab of the secondary containment area will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the container storage area rinsate sample. The area will continue to be scrubbed, rinsed, and resampled until rinsate concentrations meet GWTLs established in Chapter 62-777, FAC. Safety-Kleen anticipates that proper maintenance of the concrete containment system will allow the slab to remain in place at closure.
- Safety-Kleen will proceed with demolition of the perimeter walls. If it is determined that soil contamination exists beneath the foundation slab, Safety-Kleen will demolish the entire concrete structure and complete a further delineation of the extent of soil contamination to be removed to complete closure. Any site assessment, interim measures, or corrective action that may be required will be conducted in accordance with Chapter 62-780, F.A.C. and permit requirements.

- Prior to demolition of the perimeter walls, one representative composite sample of the construction materials will be collected and submitted for analyses (by TCLP) of metals and organics (excluding pesticides and herbicides) unless an alternate analytical protocol is required by the selected disposal facility. The representative composite sample will include biased grab samples collected from areas of staining. If no stained areas are evident, the grab sample locations will be randomly selected. If the construction materials are classified as non-hazardous using TCLP, then they will be disposed of as construction debris in an appropriately permitted disposal facility. In the event the construction materials are identified as hazardous using TCLP, the construction materials will be disposed of as a hazardous waste in accordance with RCRA regulations.
- If the foundation slab must be removed, it will be demolished and the construction materials tested using TCLP in the same manner as that described above for the walls of the secondary containment system.
- If soil removal becomes necessary, Safety-Kleen will backfill the excavated area with clean, compacted general fill material graded to match existing surfaces and to preclude ponding of water. To ensure backfill is clean (i.e., is not contaminated with constituents at concentrations above Florida soil cleanup goals or site background (whichever is higher)), Safety-Kleen will take one representative composite sample of the backfill and it will be analyzed by EPA Method 6010 for the eight RCRA metals and nickel, and by EPA Methods 8015, 8260, and 8270.

All sampling and analyses will be done in accordance with FDEP Standard Operating Procedures (SOPs) and the requirements of a Sampling and Analysis Plan (SAP) per subsection 62-730.225(3), F.A.C.

SWMU NUMBER	DESCRIPTION
1	Container storage area inside service center
2	Tank storage area inside tank farm building
3	Debris field of construction materials
4	Storm water retention area
5	Oil filter storage area (located in SWMU-1)
6	Mercury Lamps storage area (located in SWMU-1)
7	Used Antifreeze tanker
8	Municipal dumpster
9	Transfer waste storage area (located in SWMU-1)
10	Return/fill station
11	Satellite container storage (located in SWMU-10)
12	Containerized waste loading/unloading dock)
13	Oily water tanker

Part II

S. AIR EMISSION STANDARDS

AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

The requirements of 40 CFR 264 Subpart BB – Air Emission Standards for Equipment Leaks apply to certain equipment associated with the used parts washer solvent storage tanks system. Figure 2.1-2 plots the facility layout with the location of the hazardous waste management units that utilize equipment subject to Subpart BB. Equipment subject to Subpart BB requirements is included in the “tank storage waste management area” area shown in Figure 2.1-2. This equipment contains or contacts hazardous wastes with VOC concentrations > 10% by weight. The Subpart BB requirements apply to pumps, valves, flanges, etc., which are part of the used parts washer solvent storage tank system. Figure 11.1-1 shows the specific equipment items, which are considered to be in “heavy liquid service” for the purposes of Subpart BB. Compliance with the applicable sections of 40 CFR 264.1052 thru 1063 has been achieved by the implementation of the procedures outlined in Appendix D and other procedures detailed below.

Implementation Schedule

All facilities subject to these regulations were required to be in compliance by the date specified in the final rule. This facility has been in compliance since that date (see Appendix D).

Schedule and Procedures For Inspections

Pursuant to Subpart BB of 40 CFR Part 264 and 40 CFR 270.25, Safety-Kleen inspects all regulated units for leaks each business day. An inspection checklist (example shown in Figure 11.1-2) is utilized for this purpose. All valves, pumps, and flanges are visually inspected. The inspection items have been properly tagged in accordance with 40 CFR 264.1050(d) and are inventoried on the environmental piping schematic diagrams included in Figure 11.1-1. In the event that a leak is detected, repairs will be implemented in accordance with the applicable provisions of Subpart BB (first attempt at repair within 5 days; repair completed or equipment placed “out of service” within 15 days. For such repairs, a “Leak Detection and Repair Record” will be completed (see Figure 11.1-3 for an example.

Due to the inherent properties of the waste parts washer solvent stored in the tank, the use of a screening device such as a photoionization detector (PID) is impractical. The liquids are heavy and have low vapor pressures, therefore a release would be visible in a liquid phase rather than a vapor. The parts washer solvent has a maximum of 2,000 ppm concentration in the vapor phase.

Alternate Control Devices

No alternate control devices are in use at this facility.

Table 11.2-3

Subpart CC Control Options

Tanks

1. These tanks shall comply with Tank Level 1 controls which require tanks to have a fixed roof with no visible cracks, holes, gaps, or other spaces in accordance with 40 CFR 284.1084(c). The tank shall be visually inspected for defects prior to the tank becoming subject to these requirements and at least once a year thereafter [40 CFR 284.1084(c)].
2. These tanks are fixed roof tanks equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 40 CFR 284.1084(e). The internal floating roof shall be visually inspected for defects at least once every twelve months after initial fill unless complying with the alternative inspection procedures in 40 CFR 284.1084(e)(3)(iii). [40 CFR 284.1084.(d)(1)]
3. These tanks are equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 40 CFR 284.1084(f). The external roof seal gaps shall be measured in accordance with procedures contained in 40 CFR 284.1084(f)(3)(I) within 60 days and at least once every 5 years thereafter. The external floating roof shall be visually inspected for defects at least once every 12 months after initial fill. [40 CFR 284.1084(d)(2)]
4. These tanks are vented through a closed-vent system to control device and shall comply with Tank Level 2 controls in accordance with 40 CFR 284.1084(g). The tank shall be equipped with a fixed roof and closure devices which shall be visually inspected for defects initially and at least once every year. The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 284.1087. [40 CFR 284.1084(d)(3)]
5. These tanks are pressure tanks which shall comply with Tank Level 2 controls in accordance with 40 CFR 284.1084(h). [40 CFR 284.1084(d)(4)]
6. These tanks are located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device and shall comply with Tank Level 2 controls in accordance with 40 CFR 284.1084(i). The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 284.1087 [40 CFR 284.1084(d)(5)]
7. These tanks have covers which have been specified as “unsafe to inspect and monitor” and shall comply with the requirements of 40 CFR 284.1084(l)(1) [40 CFR 284.1084(f) & (g)]

Surface Impoundments

8. These surface impoundments shall have a floating membrane cover in accordance with 40 CFR 284.1085(c). The floating membrane cover shall be visually inspected for defects initially and at least once each year. [40 CFR 264.1085(b)(1)]
9. These surface impoundments shall have a cover that is vented through a closed-vent system to a control device in accordance with 40 CFR 284.1085(d). The surface impoundment cover and its closure device shall be visually inspected for defects initially and at least once a year. The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 284.1087. [40 CFR 284.1085(b)(2)]
10. These surface impoundments have covers which has been designated as “unsafe to inspect and monitor” and shall comply with the requirements of 40 CFR 284.1085(g). [40 CFR 284.1085(c) & (d)]

Table 11.2-3

Subpart CC Control Options

Containers

11. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and meet the applicable US DOT regulations under the Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 284.1086(b)(1) & (c)(1)(i)]
12. These containers have a design capacity greater than 0/1 m³ and less than or equal to 0.46 m³ and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 284.1086(b)(1)(i) & (c)(1)(i)]
13. These containers have a design capacity greater than 0/1 m³ and less than or equal to 0.46 m³ and are open-top containers in which an organic-vapor surpressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is inspected for defects at least once every twelve months. [40 CFR 284.1086(b)(1)(i) & (c)(1)(iii)]
14. These containers have a design capacity greater than 0.46 m³, are not in light material service and meet the applicable US DOT regulations under Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 284.1086(b)(1)(ii) & (c)(1)(i)]
15. These containers have a design capacity greater than 0.46 m³, are not in light material service and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 284.1086(b)(1)(ii) & (c)(1)(ii)]
16. These containers have a design capacity greater than 0.46 m³, are not in light material service and are open-top containers in which an organic-vapor surpressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 284.1086(b)(1)(ii) & (c)(1)(iii)]
17. These containers have a design capacity greater than 0.46 m³, are in light material service and meet the applicable US DOT regulations under Container Level 2 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 284.1086(b)(1)(iii) & (d)(1)(i)]

Table 11.2-3

Subpart CC Control Options

18. These containers have a design capacity greater than 0.46 m³, are in light material service and operate with no detectable organic emissions as defined in 40 CFR 265.1081. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 284.1088(b)(1)(iii) & (d)(1)(ii)]
19. These containers have a design capacity greater than 0.46 m³, are in light material service and that have been demonstrated within the preceding 12 months to be vapor tight using 40 CFR Part 60, Appendix A, Method 27. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 284.1088(b)(1)(ii) & (c)(1)(i)]
20. These containers have a design capacity greater than 0.1 m³ that are used for treatment of a hazardous waste by a waste stabilization process and are vented directly through a closed-vent system to a control device in accordance with 40 CFR 284.1086(e)(2)(ii). The closed-vent system and control devices shall be inspected and monitored as specified in 40 CFR 284.1087. [40 CFR 284.1088(b)(2) & (e)(1)(i)]
21. These containers have a design capacity greater than 0.1 m³ that are used for treatment of a hazardous waste by a waste stabilization process and are vented inside an enclosure which is exhausted through a closed-vent system to a control device in accordance with 40 CFR 284.1086(a)(2)(i) & (ii).). The closed-vent system and control devices shall be inspected and monitored as specified in 40 CFR 284.1087. [40 CFR 284.1088(b)(2) & (e)(1)(ii)]