

RCRA Permitting Routing Slip

Facility Name: SAFETY-KLEEN CORP.-TAMPA

PATS NO: 290949 _ 0 _ HO29

<u>TO</u>	<u>NAME</u>	<u>INITIALS</u>	<u>DATE</u>
	KASTURY, Satish		
	Ashwood, Janet		
	Collins, Lisa		
	McCree, Jeanese		
	McGriff, Juliette		
	Outley, Debra		
	RUSSELL, Merlin		
	Graves, Shelton		
	James, David		
	Kaharoeddin, Ami		
	Madrid, Nicanor		
	Smith, Cindy		
	Stein, Camille		
✓	OUTLAW, Doug	DO	6/19/98
	Anderson, Kathy		
✓	Griffin, John		
	Kothur, Bheem	BK	6/18/98
	Owutaka, Alex		
	Prusty, Rabin		
	Ryan, Aine		
	Schroeder, Pat		
	Vaught, Tracie		

PROJECT MANAGER: KOTHUR/STEIN**REQUIRED ACTION AND COMMENTS:**

FLD 980-847-271



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

June 11, 1998

CERTIFIED MAIL

Mr. Richard R. Morris
Environmental, Health and Safety Manager
Safety-Kleen Corporation
5309 24th Avenue South
Tampa, Florida 33619

RECEIVED
RCRA

JUN 15 1998

Hazardous Waste Regulation


Re: **Safety-Kleen Corporation, Tampa Facility FLD 980 847 271**
Operating Permit HO29-290949
Class 1 Permit Modification Request 34744-HOMM-002

Dear Mr. Morris:

The Florida Department of Environmental Protection (FDEP) is in receipt of your requests to manage lab packs and other (e.g., incompatible) wastes, under your current Fluid Recovery Services (FRS) program, as a transfer waste in accordance with Chapter 62-730.171, Florida Administrative Code. The revised pages of the operating permit (2-8, 2-9, 4-7, 6-8, 6-9, 7-3, 7-7, 8-4, 8-5, 8-8, 8-9 and Table 2.3-1) describing the facility's plan of managing this waste stream have been incorporated into the permit application (HO29-290949). Having reviewed the submittal, the FDEP hereby approves the requested modification.

Should you have any questions, please contact Roger Evans at (813) 744-6100, extension 388.

Sincerely,


Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

cc: Narindar Kumar, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDEP - Tallahassee w/Attachment

1:/skmod4.doc

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.



19 May 1998

Hand Delivered

Mr. Roger Evans
Permitting Engineer
Hazardous Waste Section
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

RECEIVED
MAY 19 1998
D E P

Re: Safety-Kleen Corporation - Tampa Service Center
FLD 980 847 271
HO29-290949
Revisions of 25 March 1998 Request for Minor Modification to Handle
10-Day Transfer of Lab Pack and Other Waste Streams

Dear Mr. Evans:

Please find enclosed the following revisions for the above referenced submittal.

- o Page 7-3 of the Permit Modification has been revised to delete language under item 6.
- o Table 2.3-1 has revised to include estimated annual tons of FRS Waste.

Four(4) copies of revised pages have been included for updating your copies of the Permit Modification.
If you have any questions concerning these revisions please contact me at (813) 626-0052.

Sincerely,

Richard R. Morris
Environmental, Health & Safety Manager

**TABLE 2.3-1
PERMITTED AND TRANSFER WASTES
SAFETY-KLEEN CORP.
TAMPA, FLORIDA**

Waste Type	Process Code(s)	Estimated Annual Amount (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	2,007	D001 and D-Codes listed in Note below.
Spent Ethylene Glycol	S01	5,000	D-Codes listed in Note below.
Spent Immersion Cleaner	S01**	268	F002, F004, and D-Codes listed in Note below.
Dry Cleaning Waste	S01**	2,495	F002, F004, and D-Codes listed in Note below.
Paint Waste	S01**	531	D001 or F002 and D-Codes listed in Note below.
Fluid Recovery Service (FRS) Waste	S01****	670	Transfer wastes - waste codes assigned by generator.
Dumpster Mud and Tank Bottom	S01**	Included in the above spent parts washer amt.	D001 and D-Codes listed in Note below.

NOTE: 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

- * Spent parts washer solvents are transported from the customer to the Branch Service Center in accordance with the customer's hazardous waste determination.
- ** This waste will be stored in containers in the north or south building container storage area. The maximum capacity in the north area is 5,200 gallons. The maximum capacity in the south area is 12,749 gallons of flammables and 41,220 gallons of nonflammables.
- *** The used parts washer solvent storage tank has a maximum storage capacity of 15,000 gallons and may be filled up to a maximum of 14,250 gallons.
- **** This waste will be held for transfer in containers in the transfer area.

6. Due to the great variability in the composition of Fluid Recovery Services (FRS) wastes, their application or use, and the source industry, Safety-Kleen characterizes each stream from each generator separately. FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), nonspecific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and will be categorized as a D- or F- waste. FRS wastes ~~except/characteristic/waste oil~~ are shipped in containers. The FRS wastes are handled as transfer wastes only.

7. 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 the customers in containers. Spent aqueous parts washer solvent from customer's parts washers may be accumulated in a 15,000-gallon aboveground storage tank via the return/fill station. Containers of solvent are poured into a drum washer at the return/fill station, which in turn empties into the tank. The used aqueous parts washer solvent may be considered characteristic waste by TCLP (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, and D043).

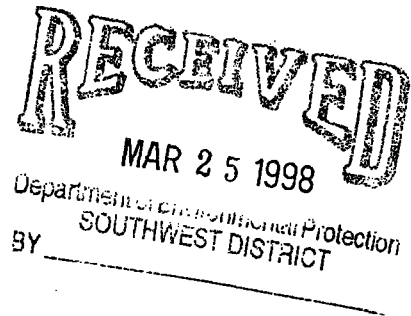
8. The Aqueous Brake Cleaner (ABC) is primarily an aqueous solution with approximately 10% nonorganic additives and detergents. The spent ABC is transported from the customers in containers. Spent ABC from customer's parts washers may be accumulated in a 15,000-gallon aboveground storage tank via the return/fill station. Containers of solvent are poured into a drum washer at the return/fill station, which in turn empties into the tank. The used aqueous parts washer solvent may be considered characteristic waste by TCLP (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, and D043).



25 March 1998

Hand Delivered

Mr. Roger Evans
Permitting Engineer
Hazardous Waste Section
Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619



Re: Safety-Kleen Corporation - Tampa Service Center
FLD 980 847 271
HO29-290949
Request for Minor Modification
10-Day Transfer of Lab Pack and Other Waste Streams

Dear Mr. Evans:

Safety-Kleen is requesting the Department's approval for 10-day transfer of lab pack wastes and other miscellaneous waste streams. Safety-Kleen intends to expand its Fluid Recovery Services (FRS) business to include handling on a transfer basis an expanded listing of waste streams. Our current permit application has some restrictive conditions which may prevent current acceptance of these waste streams. Current restrictions include language in the permit application which states that Safety-Kleen does not handle reactive and/or incompatible waste. This restrictive language has been removed from applicable portions of the permit application. Also included in the permit application are tables which appear to limit the types of wastes which the FRS program can handle. Tables 2.3.1 and 7.1.1 of the application indicate certain waste codes associated with the FRS program. Table 2.3.1 has been revised to indicate that the generator will assign codes to the FRS waste streams. Table 7.1.1 has been deleted from the permit application.

The current FRS program expansion is primarily focused on lab pack waste streams. Under our current lab pack operations, Safety-Kleen lab pack teams are containerizing lab pack wastes at customer's location in DOT approved containers and transporting the waste from the customer's facility via a third-party carrier to a third-party processing operation. Safety-Kleen intentions are to start shipping the wastes in Safety-Kleen vehicles to the Service Center for handling as 10-day transfer waste. All lab packs will be packed by Safety-Kleen. The containers of waste will be stored in an organized manner with proper aisle spacing in order for personnel to inspect the drums and to provide adequate room for any emergency response actions. Hazard classes will be segregated to avoid incompatibility problems should a release occur. Segregation will be accomplished by storage in different locations and/or aisles. Vermiculite absorbent booms will be used between hazard classes. Segregation issues have been addressed in the appropriate sections of the permit modification. In addition to ensure the safe handling of incompatible wastes, service center personnel will be trained in the best management practices for storage/handling of incompatibles. The training program has been included as part of the permit modification request.

For your information, the DOT hazard classes which will be handled as 10-day transfer are as follows.

Class 2 - Division 2.1, 2.2 (aerosols only)

Class 3

Class 4 - Division 4.1, 4.3

Class 5 - Division 5.1

Class 6 - Division 6.1, Packing Groups I, II, and III, Other than PG I inhalation hazard

Class 8

Class 9

Combustible Liquids

Please find attached four(4) copies of revised pages and instructions for updating your copies of the permit application. Also, enclosed is a check for \$250.00 to cover the costs associated with the permit modification. If you have any questions concerning this modification request please contact me at (850) 576-5979.

Sincerely,



Richard R. Morris
Environmental, Health & Safety Manager

rrm

Enclosure

INSTRUCTIONS FOR UPDATING PERMIT APPLICATION

Please replace the following pages/sections in the permit application:

- Table of Contents page v
- Pages 2-8 and 2-9
- Table 2.3-1
- Pages 4-1 through 4-7
- Table 4.2-1
- Pages 6-8 and 6-9
- Page 7-3 (removed reference to Table 7.1-1)
- Page 7-7
- Delete Table 7.1-1
- Pages 8-4 through 8-9

LIST OF TABLES

Table 2.2-1	<i>Southwest Florida Water Management District Consumptive Use Permits</i>
Table 2.2-2	<i>Southwest Florida Water Management District Well Construction Permitting</i>
Table 2.3-1	<i>Permitted and Transfer Wastes</i>
Table 4.2-1	<i>Introductory and Continuing Training Topics for Branch Service Center Employees</i>
Table 4.2-2	<i>Job Description - Resource Recovery Branch Manager</i>
Table 4.2-3	<i>Job Description - Branch Automotive Manager</i>
Table 4.2-4	<i>Job Description - Branch Industrial Manager</i>
Table 4.2-5	<i>Job Description - Branch Security</i>
Table 4.2-6	<i>Job Description - Sales Representative</i>
Table 4.2-7	<i>Job Description - Warehouse Personnel</i>
Table 4.2-8	<i>Environment, Health, & Safety Training Summary Sheet I</i>
Table 4.2-9	<i>Environment, Health, & Safety Training Summary Sheet II</i>
Table 5-1	<i>Emergency Response Equipment</i>
Table 5-2	<i>Incident Report Form</i>
Table 5-3	<i>Description and Uses of Emergency Equipment</i>
Table 6-1	<i>Inspection Schedule</i>
Table 6-2	<i>Emergency Response Equipment</i>
Table 7.2-1	<i>Parameters and Rationale for Hazardous Waste Identification</i>
Table 7.2-2	<i>Parameters and Test Methods</i>
Table 7.2-3	<i>Methods Used to Sample Hazardous Wastes</i>
Table 7.2-4	<i>Frequency of Analysis</i>

Safety-Kleen also provides a dry cleaning waste reclamation service where containers of dry cleaning wastes are collected and stored temporarily at the Branch Service Center before shipment to the recycle centers for reclamation and residue disposal. Perchloroethylene dry cleaning solvent is managed as a permitted waste. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

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

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Branch Service Center. Under this program, other types of waste are collected by the Branch Service Center and sent to the recycle centers. The FRS wastes are managed as transfer wastes. Manifests are not terminated at the Branch Service Center. These wastes may or may not have originally been obtained from Safety-Kleen by the industrial customer. Examples of the types of waste that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naphtha, etc.
2. Lubricating oils, hydraulic oils, synthetic oils, and machine oils.
3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane.
4. Photographic and x-ray related wastes.
5. Paint and lacquer thinners.
6. Lab packs (the Branch will only accept lab packs which are packed by Safety-Kleen lab pack teams).

7. Other hazardous and nonhazardous wastes.

The Branch Service Center receives comprehensive training in the handling/storage of FRS/incompatible wastes (see Section 4.0, Page 4-7).

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. The protocol for handling spent antifreeze is described in Section 2.1.

Table 2.3-1 provides a list of permitted and transfer wastes handled at the Tampa facility.

**TABLE 2.3-1
PERMITTED AND TRANSFER WASTES
SAFETY-KLEEN CORP.
TAMPA, FLORIDA**

Waste Type	Process Code(s)	Estimated Annual Amount (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	2,007	D001 and D-Codes listed in Note below.
Spent Ethylene Glycol	S01	5,000	D-Codes listed in Note below.
Spent Immersion Cleaner	S01**	268	F002, F004, and D-Codes listed in Note below.
Dry Cleaning Waste	S01**	2,495	F002, F004, and D-Codes listed in Note below.
Paint Waste	S01**	531	D001 or F002 and D-Codes listed in Note below.
Fluid Recovery Service (FRS) Waste	S01****	Included above	Transfer wastes - waste codes assigned by generator.
Dumpster Mud and Tank Bottom	S01**	Included above	D001 and D-Codes listed in Note below.

NOTE: 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

- * Spent parts washer solvents are transported from the customer to the Branch Service Center in accordance with the customer's hazardous waste determination.
- ** This waste will be stored in containers in the north or south building container storage area. The maximum capacity in the north area is 5,200 gallons. The maximum capacity in the south area is 12,749 gallons of flammables and 41,220 gallons of nonflammables.
- *** The used parts washer solvent storage tank has a maximum storage capacity of 15,000 gallons and may be filled up to a maximum of 14,250 gallons.
- **** This waste will be held for transfer in containers in the transfer area.

4.0 FACILITY SECURITY AND PERSONNEL TRAINING

4.1 SECURITY PROCEDURES AND EQUIPMENT

In accordance with 40 CFR 264.14, access to the facility is controlled through the following methods:

1. Entry to the container and return/fill areas will be controlled through gates and doors. All gates and doors will be locked at all times when facility is not in operation. The entire facility is surrounded by a chain-link fence.
2. The combination of doors and signs prevents unknowing entry and minimizes the potential for unauthorized entry of people or livestock into the facility.
3. Signs are posted at the entrance of the facility and additional locations so that they are visible from any approach at 25 feet. Signs are marked "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT." See Figure 4.1-1 for locations of the signs.
4. The entire facility is surrounded by barbed wire topped chain link fence.
5. "NO SMOKING" signs are posted in areas where hazardous wastes are handled.

4.2 PERSONNEL TRAINING

This section of the permit application describes Safety-Kleen's training program. All position descriptions referenced may not be present at this facility. Training plan outlines, job descriptions, training content, frequency and techniques are described as well as the implementation of the training program.

The purpose of Safety-Kleen's training program is to familiarize employees with environmental regulations, records, and emergency procedures so they will perform their jobs in the safest and most efficient manner possible.

Description of Training Program

Each employee is trained to operate and maintain the service center safely, and to understand hazards unique to that person's job assignment. New Branch Managers (Resource Recovery Branch Manager) and new Branch Service Center Supervisors must complete a formal introductory training program before starting their jobs, with annual review and update thereafter. New Sales Representatives must be trained prior to unsupervised customer visits. All other hazardous waste employees must undergo the training program within six months of starting.

Outline of Training Program

An example outline of the training program, given both initially and annually to employees who manage or handle hazardous waste at the Branch Service Center is presented in Table 4.2-1.

Job Title/Job Description

Job descriptions for employees who would be expected to manage or handle hazardous wastes, including the Branch Manager (Resource Recovery Branch Manager), Branch Automotive Manager, Branch Industrial Manager, Branch Secretary (paperwork only), Sales Representatives, and Warehouseperson are provided in Tables 4.2-2 through 4.2-7.

Training Content, Frequency, and Techniques

Employee training is accomplished using a combination of classroom, videotape, written, and on-the-job methods. The Environment, Health and Safety (EHS) and Training Departments of Safety-Kleen's Corporate Office prepares a training program for employees and they must provide documentation that the program has been executed. Employees are

trained prior to starting or as soon as they begin working (depending on their position), and are trained annually thereafter.

The following presents the specific training requirements for new Safety-Kleen employees who will manage or handle hazardous waste.

Training of New Branch Managers: New Branch Managers are trained for several weeks before they begin their new positions. This training is given on the job and in the classroom. During this training, the new manager reviews environmental records and learns the recordkeeping requirements. These records include: manifests, personnel records, training records, service center inspection records, and spill reports. At least eight hours of this initial training consists of an introduction to environmental law and a review of the Part B, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan.

The training culminates in four weeks of training at that person's new service center, at least one day of which is devoted to environmental training with the Environmental Health and Safety Manager. Additional time is spent reviewing past environmental compliance at the Branch Manager's service center; the regulations unique to the state are discussed as well.

Training of New Branch Automotive Manager and Branch Industrial Manager: The Branch Automotive Manager and Branch Industrial Manager are responsible for administrative operations at the Branch Service Center. This training is on location and in classroom modes. While being trained at the branch at which they will be stationed, a new Branch Automotive/Industrial Manager reviews environmental records and learns the recordkeeping and inspection requirements. These records include: manifests, personnel records, training records, service center inspection records, and spill reports.

This training includes an introduction to environmental law (including the Resource Conservation and Recovery Act), health and safety issues, emergency response and inventory (including waste) reconciliation methods. Additional time is spent reviewing past environmental compliance at the Branch Automotive/Industrial Manager's site.

Training of New Branch Service Center Secretaries: Branch Service Center Secretaries are trained in the proper recordkeeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the Branch Manager and is done within six months of starting. This training is often presented in company-produced videotape presentations on emergency response, shipping documents (including manifests), drum labels, and other safety and environmental compliance issues.

Training of New Sales Representatives: New Sales Representatives are trained on the job for two weeks during which they are introduced to manifests, service center inspection records, and training records. A Sales Representative may also be trained as the designee for performing a facility inspection. Within six months of starting a position, the sales representative must review the items listed in the example outline presented in Table 4.2-1.

Training of New Warehouseperson: A Warehouseperson is trained to maintain the service center and assist the other branch employees in their tasks. The Warehouseperson may be a designee to perform the Branch inspection and must be trained by the Branch Manager. Within six months of starting a position, the Warehouseperson must review the items listed in the example outline presented in Table 4.2-1.

Annual Training: On an annual basis, employees are trained using a program prepared and updated annually by the EHS and Training Departments which contains the topics in Table 4.2-1. This training also includes updates on environmental regulations, an in-depth review of the Contingency Plan and a review of RCRA permit criteria. In addition, periodic memoranda on changes in environmental regulations are issued by the EHS Department and must be read and discussed by branch personnel.

Training Director

The training is directed by Safety-Kleen's Training and Development and EHS Departments which operate out of the Corporate Office in Elgin, Illinois. Each Environmental Health and Safety Manager who works in this department is responsible for compliance of the service

centers in a given geographic area of the country. The EHS Department, in coordination with the facility, must:

- Provide a training program which addresses the requirements of environmental regulations and corporate policy;
- Notify the proper authorities, oversee remedial actions, and submit a written report to the state after an emergency situation has occurred;
- Assure that environmental permits are submitted and updated as required;
- Manage any environmental compliance issues which exceed the resources available at the service center level; and
- Participate in training new Branch Managers and conducting Annual Branch Manager Training.

Qualifications for individual staff members of the EHS Department who conduct training at the Service Center are available upon request.

Relevance of Training to Job Position

Each employee is trained to operate and maintain the service center safely and to understand hazards unique to the job assignment. Safety-Kleen's training programs are designed to give employees appropriate instruction regarding the hazardous waste management procedures they will encounter in performing their respective duties. Since the handling of hazardous materials is a large part of the operations of the service center, all employees are given training in environmental regulations, transportation regulations, the Preparedness and Prevention Plan, and Contingency Plan.

Training for Hazardous Waste Management

As described previously, all employees are trained in the aspects of hazardous waste management which are relevant to their position. This includes job-specific hazards and necessary precautions, emergency response, and proper recordkeeping. This training is given initially and updated annually.

Training for Contingency Plan Implementation

All employees are trained in Contingency Plan implementation, through both initial training and yearly refresher courses, as summarized in Table 4.2-1. Employees are trained on the contents of the Contingency Plan as well as criteria for implementation.

Training for Emergency Response

All employees are trained in emergency response procedures, through both initial training and yearly refresher courses, as summarized in Table 4.2-1. The emergency training involves spill and fire prevention as well as remedial action procedures. Employees are also trained to recognize when evacuation and outside assistance may be necessary.

Implementation of Training Program

New Branch Managers and Sales Representatives must complete an introductory training program discussed previously within six months of starting their jobs, with annual review and update thereafter. Branch Secretaries and Warehousepersons are given the full hazardous waste training course, as listed in the example outline shown in Table 4.2-1, within six months of starting work. Personnel involved in direct handling of hazardous waste do not work unsupervised until they have completed the entire initial hazardous waste training course.

Personnel Training Records Forms

Tables 4.2-8 and 4.2-9 are sample personnel training record forms. These forms, or forms similar to them, will be used to record training. All training is documented and kept on file at the service center until closure. Additional forms may be used contingent upon the specific issue being addressed. All forms will show the training received, employee name, and the date of training.

Training on FRS/Incompatible Wastes

Training on the handling of incompatibles is completed for all Service Center personnel. Comprehensive training is conducted for Service Center personnel who will be working directly with the incompatible waste. These individuals include industrial representatives responsible for transporting incompatibles and warehouse personnel involved in the handling/storage of the wastes at the Service Center. Topics discussed will include:

- Hazard awareness;
- Segregation practices;
- Daily preparedness and prevention (i.e., inspections) to avoid engagement of the Contingency Plan; and
- Contingency Plan training in the event emergency actions are required.

All training received will be documented as to individuals involved in training and the contents of the training.

TABLE 4.2-1

**INTRODUCTORY AND CONTINUING TRAINING TOPICS
FOR BRANCH SERVICE CENTER EMPLOYEES**

- Hazard Communication Safety Training
- Hazard Communication Understanding MSDSs
- Preventing Injuring and Illnesses
- Chemistry of Safety-Kleen Products
- Hazardous Materials Regulations
- Waste Analysis Plan
- Preparedness, Prevention, and Contingency Plan
- Day Four - Ten Day Training - Haz Mat/DOT/MANFST VID QUIZ
- Completion of New Employee Orientation Program *
- Initial Contingency Plan Training (Including Part B review) *
- Respirator Fit Testing and Training

* New employees only; not a part of annual training.

Ignitable wastes are handled so that they do not:

1. *Become subject to extreme heat or pressure, fire or explosion, or a violent reaction -*
The parts washer solvent and paint wastes are stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the containers kept at room temperature to minimize the potential for pressure build up.
2. *Produce uncontrolled toxic mists, fumes, dusts, or gases in quantities sufficient to threaten human health -* The vapor pressure of petroleum-based parts washer solvent is low (2 mm Hg) and it and the paint wastes are reactive with strong oxidizers and reactive metals only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers are carefully segregated at this facility and the solvent vaporization will be minimal under normal working conditions.
3. *Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion -* See "1" above and "4" below.
4. *Damage the structural integrity of the Safety-Kleen facility -* The parts washer solvent and paint wastes will not cause deterioration of the tank, containers, or other structural components of the facility.

Incompatible Wastes

All waste or products are kept away from ignition sources. Employees must confine smoking to the designated smoking area outside the front door of the facility.

Materials are handled so they do not:

- a. Generate extreme heat or pressure, fire or explosion, or violent reaction.

- b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health.
- c. Produce uncontrolled fires or gases in sufficient quantities to pose a risk of fire or explosion.
- d. Damage the structural integrity of the Safety-Kleen facility.

Adequate aisle space is maintained to allow unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency. Hazard classes are segregated to avoid incompatibility problems should there be a release. Segregation is accomplished by storage in different locations and/or aisle space with vermiculite absorbent (booms) between hazard classes. Containers of waste would not be routinely opened or re-packaged in any way at the Service Center. Only in an emergency situation would a container have to be opened or re-packaged.

RESPONSIBILITY FOR PREPAREDNESS AND PREVENTION PLAN

The preparedness and prevention plan, as well as the training of employees for its implementation, is the responsibility of the Branch Manager with assistance from corporate staff. The detailed training program is described in the Personnel Training Plan (Section 4.2).

6. Due to the great variability in the composition of Fluid Recovery Services (FRS) wastes, their application or use, and the source industry, Safety-Kleen characterizes each stream from each generator separately. FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), nonspecific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and will be categorized as a D- or F- waste. FRS wastes, except characteristic waste oil, are shipped in containers. The FRS wastes are handled as transfer wastes only.
7. 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 the customers in containers. Spent aqueous parts washer solvent from customer's parts washers may be accumulated in a 15,000-gallon aboveground storage tank via the return/fill station. Containers of solvent are poured into a drum washer at the return/fill station, which in turn empties into the tank. The used aqueous parts washer solvent may be considered characteristic waste by TCLP (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, and D043).
8. 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 may be accumulated in a 15,000-gallon aboveground storage tank via the return/fill station. Containers of solvent are poured into a drum washer at the return/fill station, which in turn empties into the tank. The used aqueous parts washer solvent may be considered characteristic waste by TCLP (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, and D043).

customer. These wastes are handled as transfer wastes at the Branch Service Center. Examples of the types of wastes that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, and naphtha, etc.
2. Lubricating oils, hydraulic oils, synthetic oils, and machine oils.
3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane.
4. Photographic and x-ray related wastes.
5. Paint and lacquer thinners and paint wastes.
6. Lab packs (the Branch Service Center will only accept lab packs which are packed by Safety-Kleen lab pack teams).
7. Other hazardous and nonhazardous 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.

Certain other wastes that result from the use of organic solvents are also managed through the Branch Service Center. These include the solids and sludges that settle out of the used solvent during handling and processing. Lint, paper, oils, greases, carbons, and metals are examples of materials which may settle or separate out of used solvent. In addition to the listed waste codes, these wastes may also exhibit a characteristic under the toxicity characteristic leaching procedure.

Certain solvents are not economically recoverable in their prime form. These are typically solvents of low intrinsic value (e.g., methanol), those where the user's specifications are

loading/unloading operation to minimize chances for spillage and/or employee injury. Trucks used for shipping containers between the recycle center and Branch Service Center have lift gates for drum loading/unloading. With the exception of mineral spirits, all drummed wastes are loaded/unloaded from the trucks at the docks located on the eastern side of the south and the north buildings. Wastes may be transferred from the north to the south building using hand carts or forklifts. This transfer process will utilize the garage doors on the western side of the north and south buildings. The parts washer solvent is loaded/unloaded at the return/fill station, which is described in Section 9.0.

8.2

WASTE COMPATIBILITY

Certain solvents/chemicals stored at this facility may be incompatible with each other and with other materials handled at this facility with respect to reactivity and therefore require special segregation procedures. The management of these containers is described in Section 6.0, Page 6-9.

All material at the facility is managed in accordance with local fire protection code and fire department recommendation.

8.3

WASTE MANAGEMENT

Procedure for Managing Waste Types

The used solvents/chemical wastes may be incompatible with each other and with other materials handled at this facility, with respect to reactivity, and therefore may require special segregation procedures. Segregation procedures are described in Section 6.0, Page 6-9. Overpack containers are used to manage containers whose integrity has been compromised.

All materials are managed in accordance with the local fire protection code and fire department recommendations. A separate flammable storage room has been constructed and is located at least 50 feet from the property line.

The immersion cleaner is always contained in partially filled, covered containers before, during, and after its use. Until received at a recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the Tampa facility and held in a permitted storage area before shipment to a recycle center.

Dry cleaning waste is stored in containers and consists of perchloroethylene-based waste and naphtha-based waste. The contents of the dry cleaning waste containers are not removed or processed at the Tampa facility. Perchloroethylene-based dry cleaning waste is terminated at the Tampa facility, where it is stored as permitted waste prior to shipment to a Safety-Kleen recycle center. The naphtha-based dry cleaning waste is handled at the Tampa facility as transfer waste. All naphtha-based dry cleaning waste is shipped to a Safety-Kleen recycle center within 10 days of arrival at the Tampa facility.

The parts washer solvent is collected in containers. These containers are then emptied into the dumpsters in the return/fill station.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then stored in the container storage area of the warehouse. The paint waste manifests are terminated at that point. The paint wastes are then re-manifested and periodically sent to a Safety-Kleen recycle center.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), nonspecific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. The actual waste codes will be assigned by the generator based on analytical determinations made by Safety-Kleen.

The containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications.

Wastes are stored primarily in polyethylene and steel containers.

Potential Fire Sources

The following is a list of fire prevention and minimization measures:

1. *All wastes and products are kept away from ignitable sources--*Personnel must confine smoking and open flames to the Branch designated area which is located outside the front door. No other smoking areas are designated. The parts washer solvent handling area and the aboveground storage tanks are separate from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.
2. *Ignitable wastes are handled so that they do not:*
 - a. *become subject to extreme heat or pressure, fire or explosion, or a violent reaction--*The parts washer solvent waste is stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or subject to violent reactions. The tanks are vented and the containers kept at room temperature to minimize the potential for pressure build-up.
 - b. *produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health--*The vapor pressure of petroleum-based parts washer solvent is low (2 mm Hg) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers are carefully segregated at this facility and the solvent vaporization will be minimal under normal working conditions.

- c. *produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See "a" above and "d" below.*
 - d. *damage the structural integrity of the Safety-Kleen facility--The solvents stored at this facility will not cause deterioration of the tank, containers, or other structural components of the facility.*
- 3. *Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.*
 - 4. *"NO SMOKING" signs are posted in areas where solvents are handled or stored.*
 - 5. *Fire extinguishers are checked weekly by branch personnel and inspected by the fire extinguisher company once per year.*

External Factors

The design of the installation is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside. Also, the container storage area is in a building which is inaccessible to unauthorized personnel.

- 1. *Vandalism--Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.*
- 2. *Strikes--A strike would not result in a solvent spill or fire.*
- 3. *Power Failure--A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.*
- 4. *Flooding--The site elevation is above the projected 100-year floodplain.*

5. *Storms or Cold Weather*--The solvent return/fill station is roofed to eliminate the possibility of rain or snow entering the dumpsters. No opportunity is foreseen to affect the facility with snow, cold weather, or storm water.

8.4 CONTAINER MANAGEMENT

The immersion cleaner is always contained in partially filled covered containers before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the facility and stored in the designated container storage areas before shipment to a Safety-Kleen recycle center.

Dry cleaning waste is stored in steel or polyethylene containers and consists of perchloroethylene-based waste and naphtha-based waste. Dry cleaning filters are stored in steel containers. The contents of the dry cleaning waste containers are not removed or processed at the Tampa facility. Perchloroethylene-based dry cleaning waste is terminated at the Tampa facility, where it is stored as permitted waste prior to shipment to a Safety-Kleen recycle center. The naphtha-based dry cleaning waste is handled at the Tampa facility as transfer waste. All naphtha-based dry cleaning waste is shipped to a Safety-Kleen recycle center within 10 days of arrival at the Tampa facility.

The parts washer solvent is collected in containers. The containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then stored in the container storage area of the warehouse. The paint wastes manifests are terminated at that point. The paint wastes are then re-manifested and sent to a Safety-Kleen recycle center.

FRS wastes are stored in steel or polyethylene containers. FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), nonspecific source wastes (F-

waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. The actual waste codes will be assigned by the generator based on analytical determinations made by Safety-Kleen. The FRS wastes will be managed as transfer waste. The manifest will not be terminated at the Branch Service Center. The management of FRS wastes as transfer wastes includes the provision to conduct truck-to-truck transfer of the FRS wastes. Truck-to-truck transfers are accomplished within two hours.

Wastes are stored primarily in polyethylene and steel containers. Immersion cleaner and dry cleaning waste containers are never opened at the branch, and none of the wastes are incompatible. Overpack containers are used for the management of containers whose integrity has been compromised.

8.5 *CONTAINER INSPECTION*

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.

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

The Branch Manager or designee, using the Weekly Inspection Log (Figure 6-1 or similar), inspects the facility weekly for security (gates and locks) and any evidence of sticking, corrosion, or unusual activity. The facility fence is checked weekly for deterioration, gaps under the fence, and broken wire ties.