STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

APR 2 6 1993

NOTIFICATION OF INTENT TO USE A GENERAL PERMIT TO CONSTRUCT AND OPERATE A SOLID WASTE TRANSFER STATION

DEPT. OF ENVIRONMENTAL REG. WEST PALM BEACH

GENERAL REQUIREMENT: Solid waste transfer stations are permitted in accordance with Florida Administrative Code (F.A.C.) Rule 17-701.801. The permit applicant, by completing, signing and sending this notice with the required information to the Department of Environmental Regulation, agrees to the conditions for a solid waste transfer station and is hereby granted a permit by rule provided Rule conditions are fulfilled. Send two copies of this notice with appropriate fee made payable to the Department of Environmental Regulation and all supporting documentation by certified mail to the District Office of the Department in which the facility is located. Complete all entries by typing or printing in ink.

	GENERAL INFORMATION
•	Applicant name (operating authority): Safety Kleen Corporation
	Mailing address: 129 South Kentucky Avenue, Suite 701 Lakeland, FL 53601
	Street or P.O. Box City State Ply
	Contact person: Victor L. San Agustin Telephone: (813)682-8094
	Title: Regional Environmental Manager
	Facility name (if different): Safety-Kleen (3097-01)
•	Location (main entrance): 5610 Alpha Drive, Boynton Beach, FL
	City: Boynton Beach County: Palm Beach
	Facility location coordinates:
	Section: 20 Township: 45S Range: 43E
	UTMs: Zone km E km N
	Latitude: 26 ° 32 · 22 "N Longitude: 80 ° 04 · 55 "W
	Landowner(if different than applicant): Safety-Kleen Corp.
	Mailing address: 777 Big Timber Road Elgin IL 60123
	Street or P.O. Box City State Zip
	Contact person: Victor San Agustin Telephone: (813)682-8094
	Acres within property boundary: 2.3
	Facilities used for waste disposal: No waste is disposed of at this facilities
	All materials are processed through Safety Kleen's or contract recy facilities. Planned active life of the facility: 2025

Page 1 of 3

SUPPORTING DOCUMENTATION

- If the property owner is different from applicant, attach evidence of authorization to use property as a solid waste transfer station (e.g., contract, lease, or signed letter).
- Attach a regional map which delineates the service area of the proposed transfer station.
- Attach a site plan signed, sealed and dated by a professional engineer which shows:
 - Site conditions and projected use including buildings, fences, gates, entrances and exits, parking areas, roadways, and signs;
 - b. Property boundaries, access roads, surface water bodies, and the location of 100-year flood plain boundaries;
 - c. Proposed structures and areas designated for unloading, sorting, storage, and loading including dimensions, elevations, floor plans, and the general process flow;
 - d. Adjacent properties including location of public and private wells on adjacent properties.
 - e. Relevant geological features such as water bodies, wetlands, excavated pits, or areas which may not provide proposed structures.
 - f. A copy of any valid permit for stormwater control or documentation that no permit is required, shall be submitted to the Department before the facility receives waste for disposal.

4. Attach an engineering report which includes:

- a. A description of a general operation plan for the facility including origin, composition, and expected weight/volume of still waste to be accepted by the facility, maximum waste storage times, waste disposal facilites, operating capacity, operating hours, expected life, and how any other operational requirements included in Rule 17-701.801(4), F.A.C. will be achieved at the facility;
- b. A description of the machinery and equipment to be used, including the design capacity;
- c. A transfer plan specifying the transfer route, the number and type of transfer vehicles to be used, and how often solid waste will be transferred to the disposal site;
- d. A description of the facility's drainage system and water supply system;
- A plan for hiring and training equipment operators and other personnel concerned with facility operation;
- f. A contingency plan describing alternate solid waste handling procedures for periods of inoperation, emergencies, or delays in transporting solid waste;
- g. A description how the minimum design requirements included in Rule 17-701.801(3), F.A.C. will be achieved by the proposed transfer station.

C. CERTIFICATION BY APPLICANT AND PROFESSIONAL ENGINEER

1.	Applicant	
.	Ubbricanic	,

I, Sately Leen Corp., the undersigned applicant, hereby certify that I will operate, maintain and close this facility in accordance with applicable rules of the Florida Administrative Code, and that I either own the land or have legal authorization from the land owner to use the land for a solid waste transfer station. I also agree that Department personnel may enter onto the property to inspect the facility during normal business hours.

Jule L. In Gunting
Signature of Applicant

Victor L. San Agastin Raying / Environmental
Name and Title

Manager

Date: April 23, 1993

Professional Engineer Registered in Florida (if applicable)

This is to certify that the engineering features of this solid waste transfer station have been designed/examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgement, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department.

Victor 5. Hatt

9501 Princess Palm Ave., Suite 100 Mailing Address

Victor E. Hiatt

Name and Title (please type)

Tampa, FL 33619
City, State, Zip Code

26787

florida Registration Number
 (please affix seal)

(813) 622-8727

Telephone Number

Date: $_{-}$ $\frac{4}{23}/9$

July 8. Hoth 4/23/93 Attachment B1

ATTACHMENT B1

1. If the property owner is different from applicant, attach evidence of authorization to use property as a solid waste transfer station (e.g., contract, lease or signed letter).

The property owner for this facility is Safety-Kleen Corp. who is also the applicant.

Attachment B2

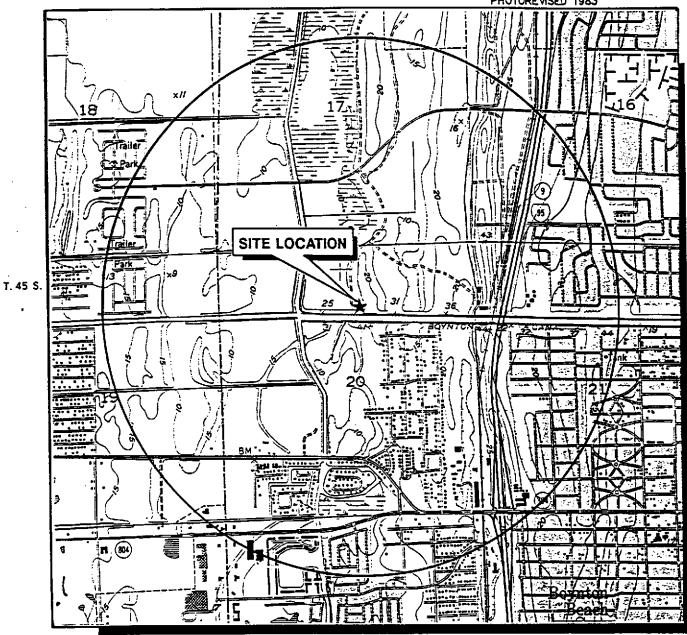
ATTACHMENT B2

2. Attach a regional map which delineates the service area of the proposed transfer station.

A topographic map (figure I.B.4-1) is provided. This map identifies the location of the proposed transfer station. A listing of the service area follows. Counties in Florida: Broward, Indian River, Martin, Okeechobee, Palm Beach, and St. Lucie (figure B2-1).

Figure I.B.4-1 Topographic Map Safety-Kleen Corp. Facility Boynton Beach, Florida

LAKE WCRTH
FLORIDA-PALM BEACH CO.
7.5 MINUTE SERIES (TOPOGRAPHIC-BATHYMETRIC)
PHOTOREMSED 1983



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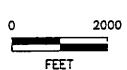
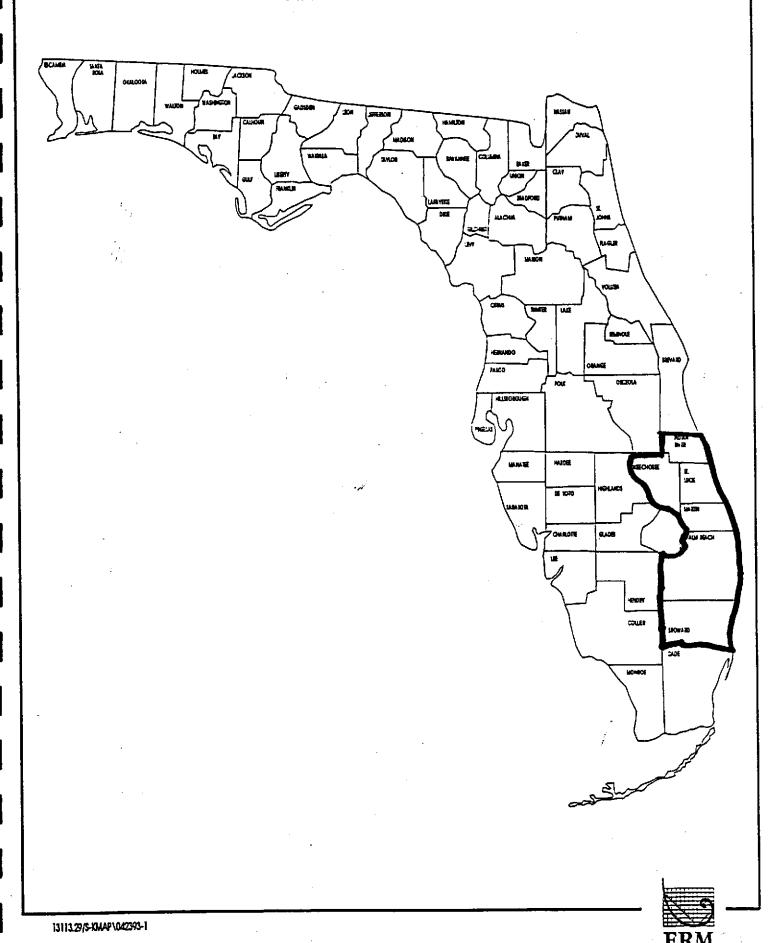








Figure B2-1 State of Florida Area of Service



Attachment B3

ATTACHMENT B3

- 3. Attach a site plan signed, sealed and dated by a professional engineer which shows:
 - a. Site conditions and projected use including buildings, fences, gates, entrances and exits, parking areas, roadways and signs;

See figure II.A.4(a)-1.

b. Property boundaries, access roads, surface water bodies, and the location of 100-year flood plain boundaries;

See figure I.B.4-4 for property boundary.

See figure I.B.4-3 for access roads.

See figure II.A.1(a)-6 for access roads and surface water bodies.

See figure I.B.4-2 for the 100-year flood plain.

 Proposed structures and areas designated for unloading, sorting, storage and loading including dimensions, elevations, floor plans, and the general process flow;

See subattachment B3-c.

d. Adjacent properties including location of public and private wells on adjacent properties;

See figures I.B.4-3 and I.B.4-5, and table I.B.4-1.

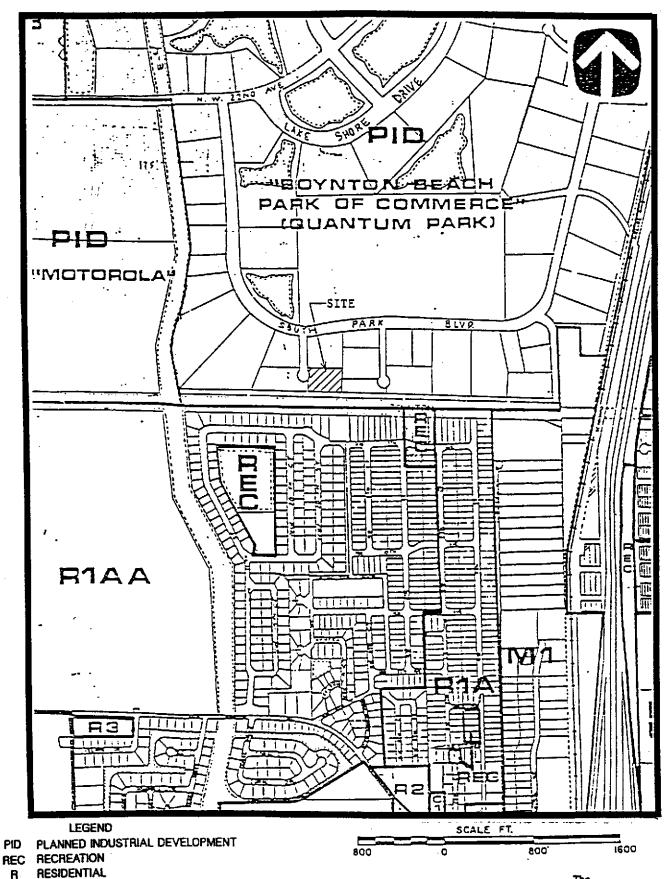
e. Relevant geological features such as water bodies, wetlands, excavated pits, or areas which may not provide proposed structures;

See figure II.A.1(a)-1 for any topographic features. To the best of Safety-Kleen's knowledge there are no geological features which would interfere with the use of this facility as a solid waste transfer station.

f. A copy of any valid permit for stormwater control or documentation that no permit is required, shall be submitted to the Department before the facility receives waste for disposal.

Legal Boundary of the Facility Safety-Kleen Corp. Facility Boynton Beach, Florida Figure I.B.4-4 15' UTILITY EASEMENT CEMENT BLOCK WALL DRY TRASH DUMPSTER ASPHALT -OVERHEAD PIPES WAREHOUSE OCCOO INDOOR STORAGE TANKS CONCRETE LOADING DOCK RÉTENTION SIX FOOT CHAINLINK/BARB WIRE FENCE STORMWATER LEGAL BOUNDARY OF THE FACILITY RETURN/ FILL SHELTER SLIDING GATE SUDING GATE SHRUBS STORM DRAIN OFFICE CEGEND CONCRETE GRASS / FIRE HYDRANT 7 ASPHALT ASPHALT 3VIFC AHS 14 13112.28/31128BND/040891

Figure I.B.4-3 Surrounding Land Uses Safety-Kleen Corp. Facility Boynton Beach, Florida



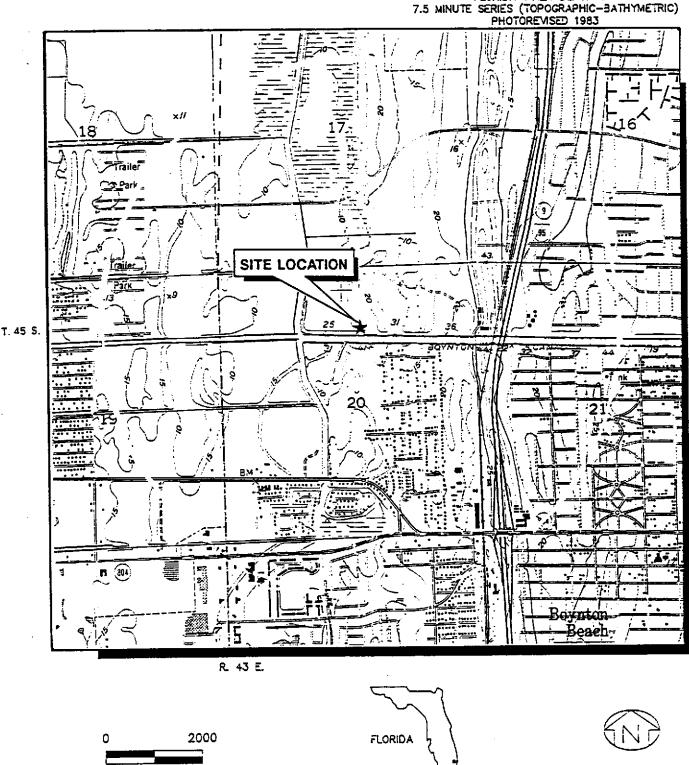
SOURCE: PALM BEACH COUNTY ZONING DEPARTMENT

М1

MANUFACTURING

Figure II.A.1(a)-6 **Surface Water Flow** Safety-Kleen Corp. Facility Boynton Beach, Florida

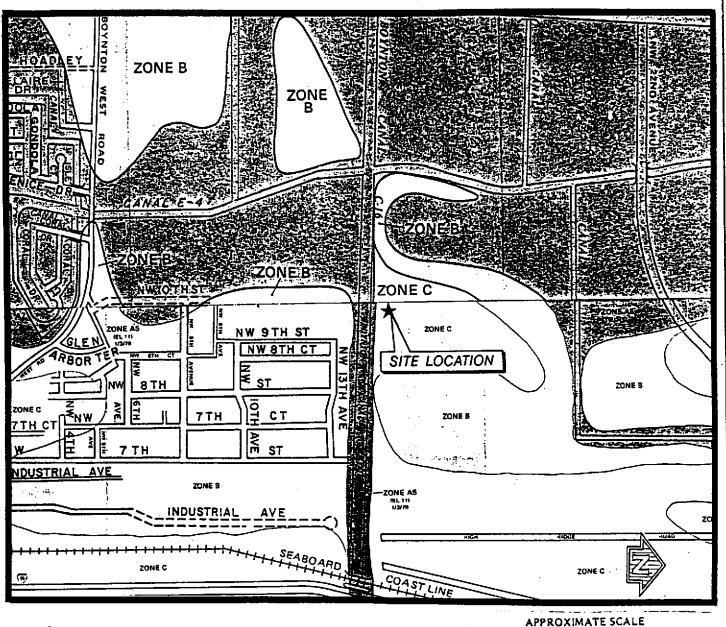
LAKE WCRTH
FLORIDA-PALM BEACH CO.
7.5 MINUTE SERIES (TOPOGRAPHIC-BATHYMETRIC)
PHOTOREVISED 1983



QUADRANGLE LOCATION

FEET

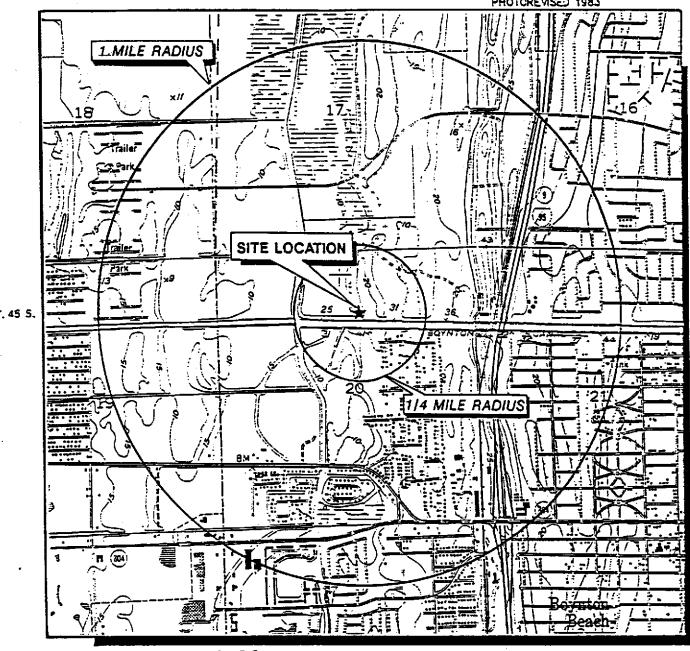
Figure I.B.4-2 Flood Map Safety-Kleen Corp. Facility Boynton Beach, Florida



1000 FEET 1000 500-Year Flood Boundary *EXPLANATION OF ZONE DESIGNATIONS ZONE B 100-Year Flood Boundary ZONÉ EXPLANATION Zone Designations* With Date of Identification e.g., 12/2/74 Areas of 100-year flood; base flood elevations and flood hazard factors not determined. Areas of minimal flooding, (No snading) Areas of undetermined, but possible, flood hazards. Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; average depths of inundation are shown, but no flood hazard factors Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors not determined. 100-Year Flood Boundary ZONE B 500-Year Flood Boundary Areas of 100-year coastal flood with velocity [wave action); base flood elevations and flood hazard factors determined. Areas of 100-year shallow flooding where depths are between one (1) and three-†3) rest; base flood elevations are shown, but no flood hazard factors are determined. 513-Base Flood Elevation Line With Elevation in Feet** Areas of 100-year flood; base flood elevations and flood hazard factors determined. A1-A30 (EL 987) Base Flood Elevation in Feet Where Uniform Within Zone** Areas of 100-year flood to be protected by flood protection system under construction; base flood elevations and flood hazard factors not determined. A99 $RM7_{\times}$ Elevation Reference Mark Areas between limits of the 100-year flood and 500-year flood: or certain areas subject to 100-year flooding with average depths less than one (1) foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the base flood. [Medium snading] Zone D Boundary River Mile **Referenced to the National Geodetic Vertical Datum of 1929

Figure I.B.4-5 Well Inventory Safety-Kleen Corp. Facility Boynton Beach, Florida

LAKE WORTH
FLORIDA—PALM BEACH CO.
7.5 MINUTE SERIES (TOPOGRAPHIC—BATHYMETRIC)
PHOTOREVISED 1983



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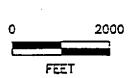








TABLE I.B.4-1

WELL PERMIT SAFETY-KLEEN CORP. FACILITY BOYNTON BEACH, FLORIDA

Str	Owner Name	Well Type	Well Depth	Well Diameter	Case Depth	Permit No.
000	Allan Murray Nursery Inc.	Agricultural	75	2	NA	50-00103-W
000	Allan Murray Nursery Inc.	Agricultural	75	2	NA	50-00103-W
000	Allan Murray Nursery Inc.	Agricultural	70	6	NA	50-00103-W
000	Allan Murray Nursery Inc.	Agricultural	86	6	NA	50-00103-W
000	Allan Murray Nursery Inc.	Agricultural	75	6	NA	50-00103-W
184543	Boynton Nurseries	Agricultural	94	8	NA	50-00145-W
04543	Manalapan, Town of	PWS	206	8	NA	50-00506-W
04543	Manalapan, Town of	PWS	206	8	NA	50-00506-W
04543	Manalapan, Town of	PWS	114	8	NA	50-00506-W
04543	Manalapan, Town of	PWS	57	6	NA	50-00506-W
04543	Manalapan, Town of	PWS	62	6	NA	50-00506-W
04543	Manalapan, Town of	PWS	75	12	NA	50-00506-W
04543	Manalapan, Town of	PWS	75	12	NA	50-00506-W
174543	Motorola, Inc.	Landscape	90	4	NA	50-01194-W
164543	Quantum Property Owners'	Commercial	NA	NA	NA	50-01685-W
000	N.C.I. Corporation	Golf Course	NA	NA	NA	50-01830-W

Information provided by South Florida Water Management District



Subattachment B3-c

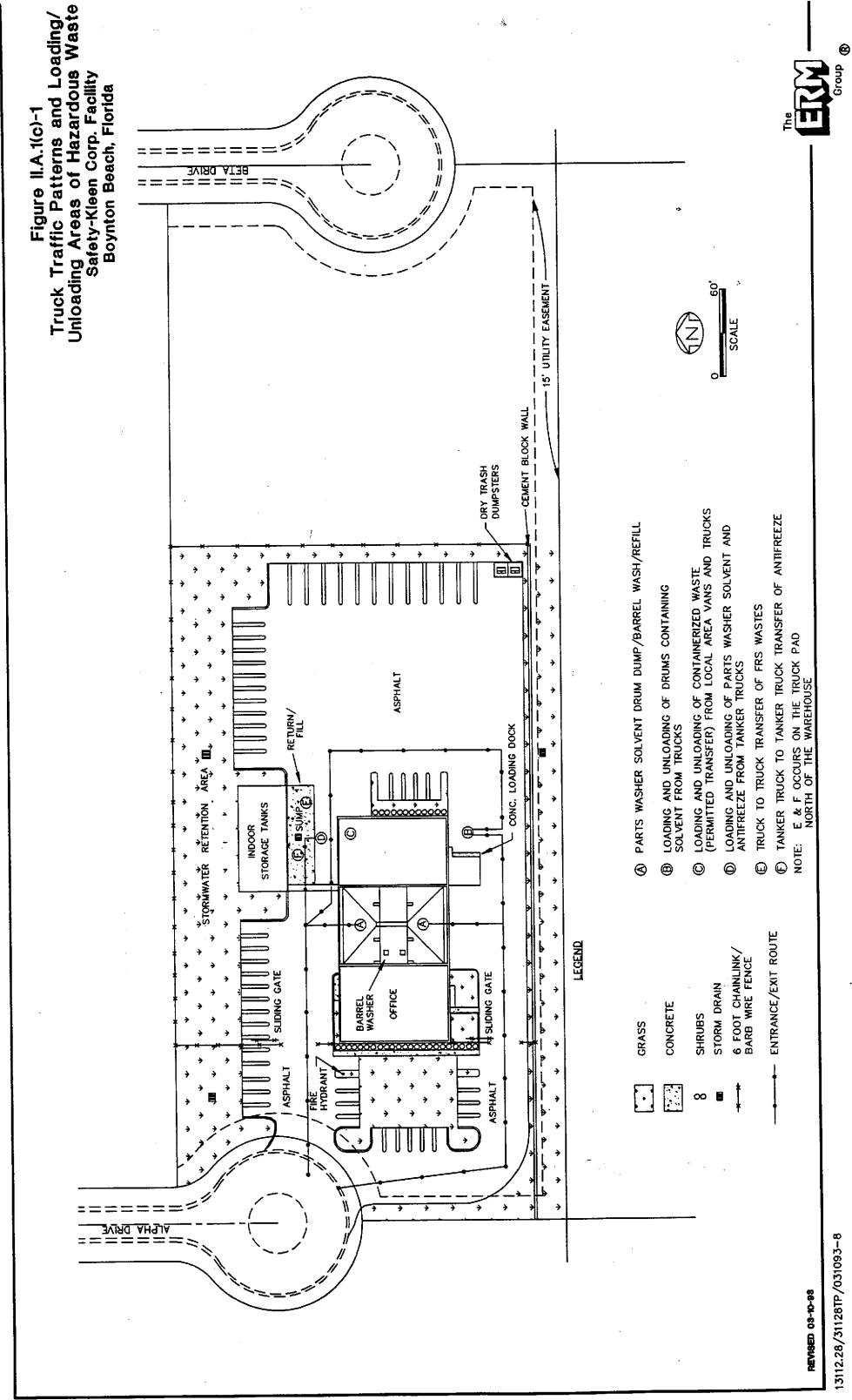
TRAFFIC INFORMATION

The facility layout and traffic patterns are illustrated in Figure II.A.1(c)-1.

The nonbuilding areas of the facility are paved with asphalt, concrete, or gravel as noted on the site plan (Figure II.A.1(c)-1). The stormwater retention area is vegetated with grass. The majority of the vehicular traffic (step side and one-ton box trucks) and loading/unloading operations occur at and near the return and fill area A and it is paved with asphalt and concrete (Figure II.A.1(c)-1). Approximately once per week a tractor trailer brings fresh drummed solvents and removes used drummed solvents for transfer to the recycle facility. This truck backs up to the eastern side of the concrete dock, located on the southern side of the facility in area B to load and unload drums. Area C will be used for the loading/unloading of transfer wastes and containerized permitted wastes from local area vans and trucks. Area E will be used for the truck-to-truck transfer of Fluid Recovery Service (FRS) wastes. Truck-to-truck transfer of spent ethylene glycol may occur in Area F. The transfer of wastes will occur only in areas with secondary containment.

The solid wastes are collected by the sales representative as a part of their routine customer serving activities. The solid wastes are transported from the customer to the service center in enclosed trucks. Once the truck arrives at the service center, the solid wastes are unloaded. The solid wastes are containerized and placed into storage in the warehouse. Approximately once a week the solid wastes are shipped either to the Operations Center or a Safety-Kleen contract recycle facility.

Congress Avenue is the major access road to the facility. The access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The vans that daily travel the routes between the service center and its customers use the two-lane road within the industrial park. The trucks dispatched from the recycle center to deliver fresh parts washer solvent and perchloroethylene, and pick up used parts washer solvent and ethylene glycol, will perform these activities at the aboveground tank area D approximately once per week. Traffic from this facility is not expected to have a major effect on local traffic conditions. Figure II.A.1(c)-2 presents anticipated 1987 average daily traffic counts for the entire region.



13112.28/31128TP/031093-8

РЕТЯОРОЦІТАИ РЕАИЧІИБ ОВБАИІХАТІОИ ОБ ОР УТИПОЭ НЭВЕМ ВЕРСИ ОБГАТЬ 0 1987 TRAFFIC VOLUMES Figure II.A.1(c)-2 Traffic Volumes Safety-Kleen Corp. Facility Boynton Beach, Florida SECTOR 6 SECTOR .E Z CONTRACTOR OF THE PROPERTY OF 130+0 اردودون المردود SILE SECTOR 4 1162111 TBSMI ---O 2 #Q+£1 op tan si (RSSA, k. salezalea la sandor A. STOM on overloge of peut one of the overloge of peut one of the overloge of the sandor of the overloge and overloge of the overloge 10121 SECTOR 3 277 - MOLDOSANS B - ZOVINCIA ZUM SS-1 CYSTRANI ZWY MODACO R3HTO SECRETARIA TO ESPECIAL SECRETARIA TO ESPECIAL SECRETARIA SEC SECTOR 2 ANTERIALS or al JIATZ 🖺 FECEND SECTOR 1



Attachment B4

ATTACHMENT B4

- 4. Attach an engineering report which includes:
 - a. A description of a general operation plan for the facility including origin, composition, and expected weight/volume of solid waste to be accepted by the facility, maximum waste storage times, waste disposal facilities, operating capacity, operating hours, expected life, and how any other operational requirements included in Rule 17-701.801(4), F.A.C. will be achieved at the facility;

This information is presented on sub-attachment B4-a.

 A description of the machinery and equipment to be used, including the design capacity;

The primary machinery and equipment to be used are the local route trucks and the operations center truck. The sales representative uses the local route truck to pick up wastes, both solid and hazardous, from the customer. These pick-ups are done by hand or using a hand cart and placing the material in the route truck. Once the waste is received at the branch, it is moved by hand through the use of pallet jacks, hand trucks, or forklifts. The waste is transferred from the branch to the operations center via truck. The route trucks are designed to hold one day's worth of customer servicing including hazardous waste and solid wastes. The route trucks are emptied each working day.

c. A transfer plan specifying the transfer route, the number and type of transfer vehicles to be used, and how often solid waste will be transferred to the disposal site;

The transfer plan for this facility is very basic. Approximately once a week, a closed truck arrives from the operations center and collects the containerized hazardous and solid wastes. The truck takes the wastes to the operations center where they are batched with similar wastes from other branches. From the operations center the wastes are transported by tractor-trailers to the recycling facility. No solid wastes are transported directly to a disposal facility.

d. A description of the facility's drainage system and water supply system;

The water and sewer for the facility are provided by the city of Boynton Beach. The drainage patterns for the facility are shown in figure II.B.4-6. The solid wastes are all stored inside covered buildings. The solid wastes do not come in contact with stormwater, and there is no leachate from the storage area.

e. A plan for hiring and training equipment operators and other personnel concerned with facility operation;

All sales representatives are required to complete a training program in hazardous waste management. As a part of this training program, the sales representatives are also oriented to each of the products provided by Safety-Kleen Corp. A part of this orientation is the proper management and disposal procedures for these products. All solid wastes managed by Safety-Kleen Corp. were originally provided by Safety-Kleen Corp. for their customer's use. A copy of the training program (attachment II.A.4(e)) is attached.

f. A contingency plan describing alternate solid waste handling procedures for periods of inoperation, emergencies, or delays in transporting solid waste;

The facility has both a Preparedness, Prevention, Contingency and Emergency Response Procedures Plan in accordance with 17-730 F.A.C. and a Spill Prevention Control and Countermeasures Plan in accordance with 40 CFR 112. These plans focus on the hazardous waste management aspects of the facility; however, the same emergency procedures will be implemented for solid waste situations.

In the event that the facility is inoperable for any reason or there are delays in transporting solid waste, the sales representatives will either not collect solid wastes from the customers or will deliver their solid waste to another Safety-Kleen Branch.

g. A description how the minimum design requirements included in Rule 17-701.801(3), F.A.C. will be achieved by the proposed transfer station.

The minimum design criteria as listed in 17-701.801(3) are as follows:

(a) On-site roads and unloading areas shall be designed for efficient movement and unloading of vehicles.

The Safety-Kleen facility is designed so that trucks enter the facility and are unloaded at a central dock. The various waste streams, both hazardous and solid, are taken from the truck and placed into the proper storage locations. Once unloaded the truck is loaded with the next day's product and moved to an overnight parking location within the compound. The central dock is designed to handle up to four trucks at a time.

(b) Tipping, processing, sorting, storage and compaction areas that are in an enclosed building or covered are shall have ventilation systems. The areas that are not enclosed shall be equipped with litter control devices and visual screening.

The Safety-Kleen facility does no tipping, processing, sorting or compaction. The solid wastes are simply stored prior to shipment to the recycle facility. All storage areas are in enclosed, ventilated buildings.

(c) The facility shall be designed with a leachate control system to prevent discharge of leachate and mixing of leachate with stormwater.

The solid waste management processes at the Safety-Kleen facility do not result in any leachate, and as previously stated, no stormwater comes in contact with the solid wastes.

(d) Provisions shall be made for weighing or measuring all incoming solid waste and recovered materials. Storage areas shall be designed to hold the expected volume of materials until they are transferred for disposal or recycling.

The Safety-Kleen sales representative indicates on each customer service report the solid waste which he collected from each customer. These reports are reconciled daily with the amount of solid waste which the facility receives from the sales representatives.

Specific locations have been identified within the facility for the storage of solid wastes. These materials are segregated from non-waste materials. The facility has the capacity to store at least 2 weeks of customer service generated solid wastes.

(e) Where the general public may use the transfer facility, safety procedures shall be established for private vehicles.

The general public cannot use this facility.

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Subattachment B4-a

DESCRIPTION OF FACILITY OPERATIONS

The Safety-Kleen facility is a permitted hazardous waste storage facility in accordance with 17-730 F.A.C. The facility receives both solid and hazardous wastes. The hazardous wastes are managed in accordance with the requirements of 17-730 F.A.C. and 40 CFR. The solid wastes are managed in accordance with 17-701 F.A.C. The following section provides information about both its hazardous and solid waste operations.

HAZARDOUS WASTE ACTIVITIES

Description of the Business

Safety-Kleen Corp. (Safety-Kleen) of Elgin, Illinois is an international, service-oriented company whose customers are primarily engaged in automotive repair and industrial maintenance. Since 1968, Safety-Kleen has been offering a leasing service for hydrocarbon and chlorinated solvents and small parts washing equipment. A unique feature of this business concept is that the solvent is produced through recycling the used solvent that is leased to the customers. Approximately two-thirds of the clean solvent leased has been previously used by the customers.

The Safety-Kleen parts washing equipment, together with the solvents, are leased to customers; the leasing charge includes regularly scheduled solvent changes and machine maintenance. The business is conducted from local service centers (sales branches) located in 45 states domestically that warehouse the products and equipment required to service the customers in their sales areas. On a regular basis, service representatives furnish clean solvent to the customers, pick up the used solvent, and ensure that the leased equipment is in good working order. In 1979, Safety-Kleen expanded their scope of operations to make their solvent leasing service available to owners of parts cleaning equipment, regardless of manufacturer, using Safety-Kleen's types of solvents.

Basically, Safety-Kleen handles three types of parts washer solvents: a petroleum-based solvent and old and new formulations of immersion cleaner. The old immersion cleaner solvent is labeled under the trade name of "Immersion Cleaner and Carburetor and Cold Parts Cleaner #609." It is a two-phase system consisting of an upper aqueous (water) layer and lower non-aqueous (solvent) layer. The water phase consists of water and Dresinate TX (sodium soap of tall oil). The solvent phase is composed of methylene chloride, orthodichlorobenzene, cresylic acid, and an amines additive. A new immersion cleaner is being marketed under the name #699 and will eventually replace the old immersion cleaner. It is a non-chlorinated solvent mixture. The solvent is composed of heavy aromatic naphtha, N-methyl-2-pyrolidon dipropylene glycol methyl ether, monoethanolamine and oleic acid. The waste contains a maximum of one percent total chlorinated solvents.

The solvents are distributed and collected by their service representatives. Containers are transported in specially-equipped, enclosed route trucks. Clean solvents are

distributed from and used solvents returned to the service center where they are stored in separate tanks for the clean (parts cleaner 105) and used parts washer solvent (parts cleaner 105 and premium solvent) bulk storage. Used parts washer solvent 105 is manifested from the customer as a hazardous waste. Used parts washer premium solvent is transported from the customer as a nonhazardous waste and only becomes hazardous once it is mixed in the used parts washer solvent tank. Warehouse space is dedicated for the storage of both clean and used immersion cleaner containers. The clean premium solvent is also stored in the warehouse. Safety-Kleen leases parts washing equipment, including partially filled containers, which double as the solvent reservoir of the parts washer. During servicing, the quantity of used solvent removed from each machine ranges from 5 to 20 gallons depending on the drum that services the machine. The parts washer solvents are collected in containers. The 609 and 699 Immersion Cleaners are also housed in containers.

Periodically, a company truck is dispatched from one of Safety-Kleen's nationwide solvent recycle facilities to the service center to deliver a load of clean solvent and pick up a load of used solvent. Parts washer solvent is transported in bulk tank trucks between the service centers and the recycle facilities. Fresh parts washer solvent is also received at the facility in containers. Clean and used parts washer solvent is transported in containers between the customer and the branch. At the branch, it is added to the used parts washer solvent tank. The immersion cleaner remains in the covered containers during transfer between the service centers and the recycle facilities. Approximately 97 percent of the solvent handled in the parts washer business is petroleum-based, while the remainder is immersion cleaner.

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are containerized on the customer's premises and are periodically collected by a sales representative. The containerized waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. Approximately 35 percent of this waste is returned to dry cleaners as usable product.

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Paint gun cleaning machines are leased to customers with a reservoir of lacquer thinner (for cleaning the paint guns). On a periodic basis the reservoir is replaced and the spent solvent taken back to the facility for shipment to a reclamation facility. Wastes containing various thinners and paints are collected in containers on the customer's premises. The sales representative collects these containers and stores them in the container storage area. These wastes are periodically shipped to a reclaimer and the regenerated solvent is distributed to Safety-Kleen customers for use as product.

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Service Centers. Under this program, fresh product similar to the fresh products provided by Safety-Kleen are collected by the service center and processed by the recycle centers. The FRS wastes will be managed as transfer wastes. The manifests will not be terminated at the service center. These products may or may not have been originally obtained from Safety-Kleen by the industrial customer. Examples of the types of wastes that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naphtha, etc.

- 2. Lubricating, hydraulic oils, and machine oils.
- 3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, freon, and trichloroethane.
- 4. Photographic and x-ray related waste.
- 5. Paint and lacquer thinners and paint wastes.
- 6. Other hazardous and non-hazardous halogenated and non-halogenated wastes.

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile repair shops. These wastes are deposited into a 150-gallon translucent carboy by the customer, on the customer's premises, and the carboy is pumped into containers or a 3,500-gallon tanker truck by a sales representative. It is then placed in the container storage warehouse, or a bulk tank in the tank building, or transferred from tanker truck to tanker truck for shipment to a recycle center.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the service center to the customer, from the customer to the service center, from the service center to the recycle facility and then from the recycle center back to the service center. The small quantities of residue remaining in the storage tanks at the service centers and after distillation of the used solvent at Safety-Kleen's solvent recycling facilities are disposed of in accordance with applicable laws and regulations.

This closed loop supplies Safety-Kleen with most of its solvent requirements; the resultant stabilized cost benefits are passed on to its customers. Ownership of the solvent remains with Safety-Kleen; the service center managers are accountable for the quantities of clean and used solvents handled by their branch operations. The service center is basically a temporary storage and transfer facility. By FDER definition, however, these centers are considered to be the waste generator.

SOLID WASTE ACTIVITIES

As a result of the use of the solvents which are provided by Safety-Kleen, some solid wastes are also generated. These solid wastes include, but are not limited to, buffer pads, used oil, photographic wastes, and used oil filters. Safety-Kleen will notify the agency 30 days prior to accepting a new waste stream which is substantially different from those currently being collected.

Safety-Kleen collects these various solid wastes from its customers. Many of these wastes are generated as a part of the normal servicing of Safety-Kleen's leased equipment. The general public has no access to this facility. All solid wastes at the facility are collected from the customers by the Safety-Kleen Sales Representative. The collected solid wastes are transferred to a permitted recycling center for reclaim or to an approved solid waste disposal facility. None of the waste goes to solid waste disposal facilities within the State of Florida.

Table B4-1 provides a listing of the origin and expected weight/volume of solid waste which is anticipated to be handled by this facility annually. Table B4-1 also provides information regarding the operating capacity of the facility.

The solid wastes are stored in a manner which prevents them from being spread around. The solid wastes are stored onsite for no more than 30 days prior to being sent to either its final destination or another transfer station for consolidation prior to shipment. No solid wastes are disposed of onsite.

The facility operates from 7:00 a.m. to 5:30 p.m. Monday through Friday, except holidays. On occasion the facility may also operate on a Saturday or Sunday. It is anticipated that the facility will be in existence until 2025.

OPERATIONAL REQUIREMENTS

The operational requirements for the facility as listed in 17-701.801(4), FAC are as follows:

(a) Prohibited wastes shall not be accepted at a transfer station. Handling of unauthorized wastes shall be addressed in the contingency plan.

Since the general public has no access to this facility and all wastes are collected at the customer's facility, it is extremely unlikely that any prohibited wastes which are not managed as a hazardous waste would reach the transfer station. It is important to note that hazardous wastes, a prohibited waste, is also managed at this same physical facility in accordance with the facility's hazardous waste operating permit pursuant to 17-730, FAC.

(b) An attendant shall be on duty whenever the facility is operating. Operating hours shall be posted, and fencing, gates, or other means shall be used to prevent unauthorized access when the station is closed.

At least one person is at the facility during normal operating hours. The facility is not open to the general public so the posting of operating hours is not appropriate. The facility is secured 24 hours a day, 7 days a week with fences and gates. The gates are normally closed and can only be opened by authorized personnel.

(c) Litter, insects, odors and vectors hall be controlled to prevent sanitary nuisance and unsightly appearance.

The facility is kept clean and free of litter. Due to the type of solid waste which is collected, insects and vectors are not a concern at this facility. Odors are also not of significant concern since all wastes are containerized.

(d) Wastes shall be handled on a first-in, first-out basis to the extent practicable.

All waste storage areas shall be cleaned at the end of each day's operations or during continuous operation, as necessary, to prevent odor or vector problems.

All floors shall be free of standing liquids. Drainage from cleaning areas shall be discharged to sanitary sewers or the equivalent.

To the extent practicable, wastes are handled on a first-in, first-out basis. The storage areas are free of debris at the end of each operating day. Additional cleaning is done as needed to prevent odors. Vector problems are not applicable to the wastes managed at this facility. Standing liquids are not normally present. Any liquids from cleaning the areas will be discharged to the sanitary sewer or containerized and managed as a solid or hazardous waste as appropriate.

(e) Adequate fire protection must be available at all times.

The facility is constructed in accordance with the local fire regulations for the activities which are conducted at the facility. The facility is provided with fire suppression systems.

(f) Recovered materials shall be clearly identified and stored in a safe, sanitary manner. A record of the type and quantity of recovered materials shall be maintained and reported as part of the county's recycling program.

All the solid wastes which are managed at this facility are sent for recovery. However, these solid wastes do not generally fall into the typical recovered materials categories of glass, plastic, paper, etc. Since the operational log records all solid waste received, this same log will serve to record the type and quantity of recovered materials.

(g) Operational records shall be maintained to include a daily log of the quantity of solid waste received and transported and the origin of the waste. Such records shall be compile on a monthly basis and shall be available for inspection by the Department. Reports shall be retained the station for three years.

Safety-Kleen maintains an operating record for the facility which will include the requested information. These records will be compiled on a monthly basis and will be retained for a minimum of 3 years.

TABLE B4-1

SOLID WASTE INFORMATION SAFETY-KLEEN CORP. BOYNTON BEACH, FLORIDA FACILITY

Solid Waste	Weekly Volume	Description of the Material	How the Material is Packaged	Operating Capacity
Used buffing pads	200 pads	Wool and rubber pads in paint and body work	Box, bag, or bin	960 pads
Used oil filters	25 to 30 30-gallon drums (10 to 200 filters/drum)	Metal and paper filters	16, 30, or 55 gallon drums	28,800 filters
Photographic wastes	a	Liquids from photographic operations	16, 30, 55- gallon drums	ь
Used oil	c	Used oil	Drums or bulk tanker trucks	c

NOTES:

^a This is a new waste stream so there is insufficient history to establish this number.

^b This volume is limited in accordance with the hazardous waste permit for this facility.

^c Safety-Kleen is registered as a used oil collection facility with FDER.

ATTACHMENT II.A.4(e)
TRAINING PROGRAM



ATTACHMENT II.A.4(e) PERSONNEL TRAINING

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

The purpose of Safety-Kleen's training program is to familiarize employees with environmental regulations, records, and emergency procedures so they can 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 his job assignment. New Branch Managers (Resource Recovery Branch Manager) and new Branch Facility managers 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 a combination of videotape and on-the-job training within six months of starting.

OUTLINE OF TRAINING PROGRAM

An outline of the training program, given both initially and annually to employees who manage or handle hazardous waste at the Service Center is presented in Table IIA.4(e)-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



INTRODUCTORY AND CONTINUING TRAINING TOPICS FOR SERVICE CENTER EMPLOYEES

- Hazard Communication Safety Training
- Hazard Communication Understanding MSDSs
- Preventing Injuries and Illnesses
- Chemistry of Safety-Kleen Products
- Hazardous Materials Regulations
- Waste Analysis Plan
- Preparedness, Prevention and Contingency Plans
- Day Four Ten Day Training Haz Mat/POT/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.



Facility Manager, Branch Automotive Manager, Branch Industrial Manager, Branch Secretary (paperwork only), Sales Representatives, Warehouse Personnel, and Special Markets Sales Manager are provided in Tables II.A.4(e)-2 through II.A.4(e)-9.

TRAINING CONTENT, FREQUENCY, AND TECHNIQUES

Employee training is accomplished using classroom, videotape, written, and on-the-job methods. The Environment Health and Safety (EHS) Department of Safety-Kleen's Corporate Office prepares a training program for employees and they must provide documentation that the program has been executed. An employee is trained prior to starting or as soon as he or she begins working, (depending on his or her position), and is 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 both on the job and in the classroom. During this training, the new manager reviews all 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 at least three weeks of training at his new service center, at least one day of which is devoted to environmental training with the Regional Environmental Engineer. Additional time is spent reviewing past environmental compliance at the Branch Manager's service center, the regulations unique to his state are discussed as well.



JOB DESCRIPTION RESOURCE RECOVERY BRANCH MANAGER

JOB DESCRIPTION:

The Resource Recovery Branch Manager has overall responsibility for the facility operations and maintenance, and directs sales activities within a certain geographic area defined by the corporate Marketing Department. He is responsible for the proper operations and profitability of the service center.

REPORTS TO:

Regional Manager of Sales

QUALIFICATION:

Minimum high school graduate with Safety-Kleen sales experience

- 1. Plan, direct, and monitor activities of Sales Representatives.
- 2. Training of branch facility managers, sales representatives, and other branch personnel.
- 3. Assist or accompany sales representatives during their sales activities when necessary.
- 4. Tabulate daily sales and inventory figures and report them to the corporate offices.
- 5. Maintain adequate inventory of solvents, allied products, and equipment.
- 6. Carry out corporate policies and standards regarding facilities, equipment operation and maintenance.
- 7. Ensure the regular inspection of the facility and equipment and the implementation of any necessary repairs or remedial actions.
- 8. Represent Safety-Kleen Corp. in local community affairs and public relations activities.
- 9. Coordinate with corporate Technical Services and EHS Departments and implement necessary actions or plans for Regulatory compliance.
- 10. Be able to act as the primary emergency response coordinator.



JOB DESCRIPTION BRANCH FACILITY MANAGER

JOB DESCRIPTION:

Assures branch facility compliance with the Federal and State Environmental Protection Agencies (EPA), the Occupational, Safety and Health Administration (OSHA), the Department of Transportation (DOT), the Department of Labor (DOL) and other regulating agencies. Protects Company assets by implementing corporate systems to accurately monitor and track inventory, fleet safety conditions, and accuracy of documents.

REPORTS TO:

Branch Manager

QUALIFICATION:

Minimum high school graduate with Safety-Kleen route sales experience

- 1. May function as the Emergency Response Coordinator for the facility.
- 2. Maintains a minimum FMIR score of 90.
- 3. Works with Technical Services and Environmental Department to correct problems in the facility or to enhance the facility to meet new demands.
- 4. Assures branch compliance related to the preparation and completion of hazardous waste paperwork and proper branch procedures for management and shipment of hazardous wastes.
- 5. Performs weekly/daily facility inspections.
- 6. Maintains and updates the Contingency Plan.
- 7. Maintains accurate records, including personnel training files.
- 8. Implements the Hazard Communication Standard ("Right-to-Know").
- 9. Implements a Respirator Protection Program.



TABLE II.A.4(e)-3 - Continued

JOB DESCRIPTION BRANCH FACILITY MANAGER

- 10. Conducts Health and Safety Meetings.
- 11. Assures all necessary personnel are DOT certified.
- 12. Assures all vehicles are in compliance.
- 13. Performs weekly/daily fleet inspections.



JOB DESCRIPTION BRANCH AUTOMOTIVE MANAGER

JOB DESCRIPTION:

Develops and maintains automotive account business by presenting and providing the complete Automotive Fluid Recovery Service to customers in assigned territories. Trains, motivates, and controls the automotive sales staff within the assigned territories.

REPORTS TO:

Directly to the Resource Recovery Branch manager and indirectly to Regional Automotive Sales Manager. All Automotive and Oil Sales Representatives within assigned territories report directly to the BAM. In branches without a BFM, one or more Branch Secretaries report to the BAM, as assigned by the Resource Recovery Branch Manager.

QUALIFICATION:

Minimum high school graduate with above average Safety-Kleen route sales experience. Applicant should exhibit leadership abilities and be self-motivated, and pass Company testing.

- 1. Markets and sells the total Automotive Fluid Recovery Service.
- 2. Signs automotive accounts to the Safety-Kleen Service Contract and Oil agreements where applicable.
- 3. Ensures that customers have the right kind of equipment which is properly labeled, and on the appropriate service interval, by completing machine condition reports.
- 4. Ensures that the Company's ethical standards are maintained.
- 5. Reviews weekly and period sales production summaries.
- 6. Ensures the timely completion of services.
- 7. Reviews and acts on accounts receivable standards.
- 8. Assures proper completion and administration of hazardous waste paperwork.



TABLE II.A.4(e)-4 - Continued

JOB DESCRIPTION BRANCH AUTOMOTIVE MANAGER

- 9. Assures proper management, preparation, and shipment of hazardous waste (including packaging, placarding, transportation, and storage procedures).
- 10. Assures DOT compliance.
- 11. Trains personnel following the Corporate Training 10-Day Action Plan.
- 12. Conducts sales meetings.
- 13. Oversees career development by conducting selling skills training meetings (in conjunction with ASM).
- 14. Conducts health and safety meetings.
- 15. Develops team contests or rewards for set period objectives.
- 16. Develops rewards for achieved objectives.
- 17. Holds monthly goal setting sessions with assigned personnel.
- 18. Conducts quarterly performance reviews with assigned personnel.
- 19. Controls all personnel within the assigned territories by daily/weekly communication in regards to branch standards and goals.



JOB DESCRIPTION BRANCH INDUSTRIAL MANAGER

JOB DESCRIPTION:

Develops and maintains industrial account business by presenting and providing the complete Industrial Fluid Recovery Service to customers in assigned territories. Trains, motivates, and controls the industrial sales staff within the assigned territories.

REPORTS TO:

Directly to the Resource Recovery Branch Manager and indirectly to Regional Industrial Sales Manager. All Industrial Sales Representatives within assigned territories report directly to the BIM. In branches without a BFM, one or more Branch Secretaries report to the BIM, as assigned by the Resource Recovery Branch Manager.

QUALIFICATION:

Minimum high school graduate with above average Safety-Kleen route sales experience. Applicant should exhibit leadership abilities, be self-motivated, and pass Company testing. Good reading and letter writing skills are also required.

- 1. Ensures that customers have the right kind of equipment which is properly labeled, and on the appropriate service interval, by completing machine condition reports.
- 2. Ensures that the Company's ethical standards are maintained.
- 3. Performs the required amount of cold calls, sample processing, and machine placements.
- 4. Reviews weekly and period sales production summaries.
- 5. Ensures the timely completion of services.
- 6. Reviews and acts on accounts receivable standards.
- 7. Assures proper completion and administration of hazardous waste paperwork.



TABLE II.A.4(e)-5 - Continued

JOB DESCRIPTION BRANCH INDUSTRIAL MANAGER

- 8. Assures proper management, preparation, and shipment of hazardous waste (including packaging, placarding, transportation, and storage procedures).
- 9. Assures DOT compliance.
- 10. Trains personnel following the Corporate Training 10-Day Action Plan.
- 11. Conducts sales meetings.
- 12. Oversees career development by conducting selling skills training meetings (in conjunction with ISM).
- 13. Conducts health and safety meetings.
- 14. Develops team contests or rewards for set period objectives.
- 15. Develops rewards for achieved objectives.
- 16. Holds monthly goal setting sessions with assigned personnel.
- 17. Conducts quarterly performance reviews with assigned personnel.
- 18. Controls all personnel within the assigned territories by daily/weekly communication in regards to branch standards and goals.



TABLE 11.A.4(e)-6

JOB DESCRIPTION BRANCH SECRETARY

JOB DESCRIPTION:

Performs duties to assist the branch manager, sales representatives, and customers with billing, scheduling, and recordkeeping. Performs secretarial duties at the branch.

REPORTS TO:

Branch Manager

QUALIFICATION:

Attended high school

- 1. Maintain records in an orderly manner.
- 2. Assist sales representatives in scheduling services.
- 3. Ensure that all hazardous waste manifests are complete, and manage distribution and filing of copies.
- 4. Maintain Personnel Training Record files.
- 5. Maintain Facility Inspection Records.
- 6. Answer customer inquiries.
- 7. Manage customer billing.
- 8. Perform other related duties as assigned.



JOB DESCRIPTION SALES REPRESENTATIVE

JOB DESCRIPTION:

The Sales Representative is charged with the responsibility of generating new business and servicing established accounts within a certain defined geographic area.

REPORTS TO:

Branch Automotive Manager or Branch Industrial Manager

QUALIFICATION:

Minimum high school graduate

- 1. Maintain his route truck and replenish his products on the truck before beginning his route sales.
- Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
- 3. Exchange used solvents with fresh solvent and replenish the inventory of Safety-Kleen's products for existing customers.
- 4. Make minor repairs of Safety-Kleen's parts washer equipment or lease new equipment to the customer.
- 5. Prepare the necessary paperwork for each service, and bill or credit the customer, as necessary.
- 6. At the end of each day, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the Branch Manager can tabulate the daily figures and forward them to the corporate office.



JOB DESCRIPTION WAREHOUSE PERSONNEL

JOB DESCRIPTION:

Perform duties to assist the sales representatives in loading and unloading the trucks. Perform janitorial duties at the warehouse.

REPORTS TO:

Branch Manager

QUALIFICATIONS:

Attended high school

- 1. Maintain warehouse in clean and orderly manner.
- 2. Assist sales representatives in loading trucks and replacing solvent.
- 3. Refurbish drums as needed.
- 4. Park or move trucks as needed.
- 5. Stock inventory.
- 6. Replenish trucks with inventory.
- 7. Perform other related duties as assigned.



JOB DESCRIPTION SPECIAL MARKETS SALES MANAGER

JOB DESCRIPTION:

Develops and maintains Corporate and Branch goals related to special markets by planning, organizing, directing, and controlling all assigned employees. In most instances, the BSM is responsible for personal production within an assigned zone and operates under the guidelines established by the Special Markets Sales Specialist job description. This would include a minimum number of sales calls that would generate a set revenue quota. Branch specific standards would be established by the Regional Special Markets Sales Manager in conjunction with the Resource Recovery Branch Manager.

REPORTS TO:

The Resource Recovery Branch Manager.

QUALIFICATION:

Minimum high school graduate

- 1. Responsible for sales and service of one-half route and for obtaining the branch's total sales objectives.
- 2. Responsible for personally netting six new customers or equivalent sales revenue per period.
- 3. Responsible for training and developing Special Markets Sales Specialists.
- 4. Responsible for developing new customers for Paint Refinishing and Dry Cleaning throughout all branch routes.
- Through training, assures proper management, preparation, and shipment of hazardous materials and waste (including packaging, placarding, transportation, storage, and paperwork procedures).



TABLE II.A.4(e)-9 - Continued

JOB DESCRIPTION SPECIAL MARKETS SALES MANAGER

- 6. Assures the meeting of assigned sales quotas.
- 7. Assures that Safety-Kleen equipment at customers (where applicable) is properly labeled and on the appropriate service interval by completing Customer Visit Reports.
- 8. Assures that the company's ethical standards are maintained.
- 9. Reviews weekly and period sales promotion summaries.
- 10. Assures the timely completion of services.
- 11. Reviews and acts on accounts receivable standards.
- 12. Conducts sales meetings.
- 13. Develops team contests or rewards for set period objectives.
- 14. Holds monthly goal setting sessions with assigned personnel.
- 15. Conducts quarterly performance reviews with assigned personnel.
- 16. Controls all personnel within the assigned territories by daily/weekly communication in regards to branch standards and goals.



Training of New Branch Facility Managers: Branch Facility Managers report to Branch Managers and are responsible for administrative operations at branches. New Branch Facility Managers are trained for approximately 12 weeks before they begin their new positions in an unsupervised manner. This training is both on location and in classroom modes. While being trained at the branch at which he or she will be stationed, a new Branch Facility Manager reviews all environmental records and learns the recordkeeping and inspection requirements. These records include: manifests, personnel records, training records, service center inspection records, and spill reports.

Approximately three weeks of training take place at Safety-Kleen's corporate headquarters. 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 Facility Manager's site, the regulations unique to his or her state are discussed as well. The Branch Facility Manager may also be trained as the designee for performing the service center inspection.

Branch Automotive Managers, Branch Industrial Managers, and Special Markets Sales Managers receive training specified in Table II.A.4(e)-1.

Training of New Branch Secretaries: Branch 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. In addition, the Preparedness, Prevention,



Contingency, and Emergency Procedures Plan must be reviewed with the Branch Manager within the first two weeks of the Secretary starting work.

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 the service center inspection. Additional training is in the form of videotape presentations and a review of the Preparedness, Prevention, Contingency, Emergency Procedures Plan. The Preparedness, Prevention, Contingency, and Emergency Procedures Plan must be reviewed with the Branch Manager before the Sales Representative formally begins his new position and annually thereafter. New Sales Representatives must complete Training Sheet I (Table II.A.4(e)-10) within six months.

Training of New Warehousemen: A warehouseman is trained to maintain the service center and assist the other branch employees in their tasks. He may be a designee for the service center inspection and must be trained by the Branch Manager as such. Within two weeks of the warehouseman's starting, the Branch Manager must review the Preparedness, Prevention, Contingency, and Emergency Procedures Plan with him, and within six months he must review the items listed in the outline presented in Table II.A.4(e)-1.

Annual Training: On an annual basis, employees are trained using a program prepared and updated annually the EHS Department which contains the topics in Table II.A.4(e)-1. This training also includes updates on environmental regulations, an in-depth review of the Preparedness, Prevention, Contingency, and Emergency Procedures Plan and a review of RCRA inspection criteria. This review is in the form of videotapes and a review and discussion of the storage service center permit/application. In addition,

ENVIRONMENT, HEALTH, & SAFETY TRAINING

TRAINING SUMMARY SHEET I

Branch Name :	Branch No.:	
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EHS VIDEO PART II - HAZ	COM - Understanding MSDSs	
EHS VIDEO PART III - Pr	eventing Injuries & Illnesses	
EHS VIDEO PART IV - Haz	ards Associated w/ Mat'ls Handling	
EHS VIDEO PART V - Chem	istry of Safety - Kleen Products	
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EHS VIDEO PART VII - Wa		
	Prep., Prvn., & Contingency Plans	
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	an Training (incl. Part B review)	
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** CONTINUING TRAINING **

(On the following TRAINING SUMMARY SHEET IIs)

TABLE II.A.4(e)-10 (CONT.)

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ENVIRONMENT, HEALTH, & SAFETY TRAINING

TRAINING SUMMARY SHEET II

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			11.	A.4(e)-	4B				

periodic memoranda on changes in environmental regulations are issued by the EHS Department and must be read and discussed by all branch personnel.

TRAINING DIRECTOR

The training is directed by Safety-Kleen's Training and Development and Environment, Health and Safety (EHS) Departments which operate out of the Corporate Office in Elgin, Illinois. Each regional environmental engineer who works in this department is responsible for compliance of the service centers in a given geographic area of the country. The cooperative effort of both departments 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;
- Manage any environmental compliance issues which exceed the resources available at the service center level; and
- Participate in training new Branch Managers.

Qualifications for individuals that are members of the EHS Department and may 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, Prevention, Contingency, and Emergency Procedures 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 PREPAREDNESS, PREVENTION, CONTINGENCY, AND EMERGENCY PROCEDURES PLAN IMPLEMENTATION

All employees are trained in Preparedness, Prevention, Contingency, and Emergency Procedures Plan implementation, through both initial training and yearly refresher courses, as summarized in Table II.A.4(e)-1. Employees are trained on the contents of the Preparedness, Prevention, Contingency, and Emergency Procedures 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 II.A.4(e)-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, Branch Facility Managers, and Sales Representatives must complete an introductory training program discussed previously before starting their jobs,



with annual review and update thereafter. Branch Secretaries and Warehousemen are given instruction on the Preparedness, Prevention, Contingency, and Emergency Procedures Plan within two weeks of starting work, and are given the full hazardous waste training course, as outlined in Table II.A.4(e)-1, within six months of starting work. Warehousemen involved in direct handling of hazardous waste do not work unsupervised until they have completed the entire initial hazardous waste training course.

PERSONNEL TRAINING RECORD FORMS

Table II.A.4(e)-10 is a sample personnel training record form. This form, or one similar to it, 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.

