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November 10, 2013

Fedex Next Day 803033497603

Mr. Merlin Russell Jr.
Hazardous Waste Permitting
Florida Department of Environmental Protection
2600 Blair Stone Rd., MS #4560
Tallahassee, FL 32399

**RE: Safety-Kleen Systems, Inc. Sanford Facility – 600 Central Park Drive,
Sanford, FL 32771; EPA ID# FLD 984 171 165; Hazardous Waste
Operating Permit Application Renewal 22198-HO-005 2013.**

Dear Mr. Russell:

Safety-Kleen Systems, Inc. is submitting the enclosed copy of the above-referenced Operating Permit Renewal application. Also enclosed is the \$10,000 application fee. I am also sending a copy to the FDEP Central District.

If you have any questions or comments, please contact me at 561-523-4719.

Best regards,

Jeff Curtis
EHS Manager, Florida
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, FL 33426
jeff.curtis@safety-kleen.com



Check No. 1255737

THE BACK OF THIS CHECK CONTAINS A SECURITY MARK® - DO NOT ACCEPT WITHOUT HOLDING AT AN ANGLE TO VERIFY SECURITY MARK®



42 Longwater Drive
Norwell, MA 02061-9149

Bank of America

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Date 17.Oct.2013

1255737

Pay ****TEN THOUSAND AND XX / 100 DOLLAR****

Pay Amount \$10,000.00***

Non-Negotiable after 180 Days

**To The
Order Of**

FLORIDA DEPARTMENT ENVIRONMENTAL
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399-2400

Co-Signature Required over \$50,000.00

James R. Kelley, Jr.
Authorized Signature

11 1 255737 11 1:0 1 19004451:

6849011



PERMIT APPLICATION

**RCRA OPERATING PERMIT
RENEWAL APPLICATION**

*Safety-Kleen Systems, Inc.
Sanford Service Center
600 Central Park Drive
Sanford, FL 32771*

November, 2013

Prepared for:

Safety-Kleen Systems, Inc.
2600 North Central Expressway
Suite 400
Richardson, Texas 75080

**APPLICATION FOR A HAZARDOUS WASTE PERMIT
PART I – GENERAL
TO BE COMPLETED BY ALL APPLICANTS**

Please Type or Print

A. General Information

1. Type of Facility in accordance with Part 270.13(a)

☐ DISPOSAL

☐ Landfill ☐ Land Treatment ☐ Surface Impoundment

☐ Miscellaneous Units Type of Unit _____

☒ STORAGE

☒ Containers ☒ Tanks ☐ Piles

☐ Surface Impoundment ☐ Containment Building

☐ Miscellaneous Unit Type of Unit _____

☐ TREATMENT

☐ Tanks ☐ Piles ☐ Surface Impoundment

☐ Incineration ☐ Containment Building

☐ Boiler / Industrial Furnace Type of Unit _____

☐ Miscellaneous Unit Type of Unit _____

2. Type of application:

☐ Construction Permit

☒ Operation Permit

☐ Construction & Operation Permit

☐ Research, Development & Demonstration (RD&D) Permit

☐ Postclosure Permit

☐ Clean Closure Plan

☐ Subpart H Remedial Action Plan

☐ Equivalency Demonstration

3. Revision Number: 0

4. Date current operation began, or is expected to begin: 01 / 31 / 1993

5. Facility Name Safety-Kleen Systems, Inc.

6. EPA/DEP I.D. No. FLD 984 171 165

7. Facility location or street address 600 Central Park Drive, Sanford, FL 32771

16. Site ownership status

- ☒ Owned ☐ To be purchased ☐ To be leased _____ years
☐ Presently leased; the expiration date of the lease is ____/____/____.

If leased, indicate land owner's name _____

Address _____
Street or P.O. Box city state zip

E-mail address jeff.curtis@safety-kleen.com

17. Name of engineer Robert W. Fox Registration No. 40980

Address 10210 Highland Manor Drive, Suite 140, Tampa FL 33610
Street or P.O. Box city state zip

Associated with Environmental Resources Management, Inc.

18. Is the facility located on Tribal land? ☐ Yes ☒ No

19. Existing or pending environmental permits (attach a separate sheet if necessary)

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
HW Permit	FDEP	22198-HO-005	9/8/09	5/10/14
UO/Filter Transfe	FDEP	FLD984171165	7/3/13	6/30/14
HW Trans	FDEP	FLD984171165	7/1/13	6/30/14
Lamps/Mercury	FDEP	FLD984171165	2/12/13	3/1/14

B. Site Information

1. The facility is located in Seminole County.

The nearest community to the facility is Sanford

Latitude 28 48' 00" N Longitude 81 19' 10" W

Method and datum _____

2. The area of the facility site is 3.2 acres.

3. Attach a scale drawing and photographs of the facility showing the location of all past, present, and future treatment, storage and disposal areas. Also show the hazardous wastes traffic pattern including estimated volume and control.

Part I

B. Site Information

3. FACILITY LAYOUT AND TRAFFIC PATTERNS

The facility layout is shown in Figure 2.1-1. The non-building areas of the facility are paved with asphalt, or concrete, as noted on the site plan. Site photographs are provided in Appendix A.

Site traffic patterns are illustrated in Figure 2.1-2. The majority of the vehicular traffic and loading/unloading operation occurs at and near the return/fill area (Area A), which is paved with concrete. Approximately once per week a tractor trailer delivers containerized product and removes containerized waste for transfer to a Safety-Kleen TSDF. This truck backs up to the concrete dock, located on the north-western side of the facility in Area B, to load and unload containers. Areas A & D are used for the loading/unloading of transfer wastes, and containerized permitted wastes from local vans and trucks. The trucks dispatched from the recycle center to deliver parts washer solvent and pick up used parts washer solvent will perform these activities at the above-ground tank truck loading area (Area C) approximately once per week. Use oil loading/unloading will also take place in Area C.

U.S. 46, 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 travel the routes daily between the service center and Safety-Kleen customers use the two-lane road within the industrial park (Central Park Drive). Traffic from this facility will have a minor impact on local traffic conditions.

Part I

B. Site Information

4. SITE TOPOGRAPHY AND SURROUNDING LAND USE

Figure 2.2-1 is a USGS topographic map showing the facility. Due to the small size of the site, all of the information requested in FDEP's application form cannot be placed on one map. Therefore, additional maps are provided here to present the additional information requested in the application form. Specific information requested in the permit application is provided below.

100-Year Floodplain Area

Based on information available from the Federal Emergency Management Agency (Figure 2.2-2), the facility does not lie within the 100-year flood plain. This site is located in Zone C, which is an area of minimal flooding.

Surface Water Bodies Within One-Quarter Mile of the Facility Property Boundary (e.g., Intermittent Streams and Springs)

Surface water bodies located within one-quarter mile of the facility property boundary include Smith Canal, which runs along the western and southern boundaries of the site, as shown in Figure 2.2-1. There are two lakes, one to the northwest, and the other to the southwest of the site.

Surrounding Land Uses

Surrounding land uses are shown in Figure 2.2-3.

Legal Boundaries of the Facility

Figure 2.2-4 shows the property boundaries.

Drinking Water Wells Listed In Public Records or Otherwise Known to the Applicant Within One-Quarter Mile of the Facility Property Boundary

A well survey is found on Figure 2.2-8. The information was obtained from the St. John's River Water Management District (SJRWMD).

Intake and Discharge Structures Within One Mile

There are no known intake or discharge structures within one mile.

Run-Off Control System

The facility's paved areas are sloped such that rainwater run-off is directed to the retention swales on the north and south sides of the property. Figure 2.2-5 illustrates the contours and anticipated surface water run-off direction. Overflow will discharge into the Smith Canal. Seepage from the swales percolates into the ground water and then into the same canal.

Access Control (fences, gates, etc.)

Figure 2.1-1 shows access control features.

Injection and Withdrawal Wells Both On Site and Off Site

There are no injection or withdrawal wells on site. To the best of Safety-Kleen's knowledge, there are no known injection or withdrawal wells within one-quarter mile of the facility.

Buildings and Other Structures

Buildings and other structures are shown in Figure 2.1-1.

Contours Sufficient to Show Surface Water Flow

Figure 2.2-5 shows surface elevations at the facility. The site is nearly flat, with surface elevations in unpaved areas. Paved areas are at slightly higher elevations. Surface water flow is directed toward the drainage catchment basins shown in Figure 2.2-5.

Loading and Unloading Areas

Figure 2.1-2 shows loading and unloading areas in relation to the waste management areas.

Hazardous Waste Units

Figure 2.2-6 shows hazardous waste management units.

Wind Rose

A wind rose for Orlando, Florida is shown in Figure 2.2-7.

Part I

D. Operating Information

2. DESCRIPTION OF FACILITY OPERATION

Description of the Business

Safety-Kleen Systems, Inc. of Richardson, Texas 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 petroleum-based hydrocarbon solvents and small parts washing equipment.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the Branch to the customer, from the customer to the Branch, from the Branch to the recycle facility, and then from the recycle center back to the Branch for redistribution to customers. This closed loop supplies Safety-Kleen with most of its solvent requirements (nearly two-thirds of the clean solvent delivered to the field has been previously used by its customers). Ownership of the solvent remains with Safety-Kleen. Solvent containers (product and waste) are transported in specially-equipped, enclosed route trucks. Five aboveground tanks are maintained at the Safety-Kleen Sanford facility. These tanks are used for storage of waste solvent, and product 150 Premium Solvent, Use Oil, and Used Antifreeze.

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 Branches (sales branches) located in 45 states. The Branches warehouse the products and equipment required to service the customers in their sales area. On a contractual 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 solvents.

Basically, Safety-Kleen handles two types of parts washers. The original service offered by the company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a container of parts washer solvent. On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the container of used solvent with one of clean product. Safety-Kleen has also established a parts cleaner service for users who own their own machines. This service provides a solvent reclamation service to these customers regardless of machine model. All clean parts washer solvents are delivered to customers in containers. All spent parts washer solvents are transported from the customer to the Branch in containers.

Upon return of the spent solvent to the branch, the material is transferred from the containers to a wet dumpster. Most of the 150 solvent used by customers will be utilized by the Branch for the washing of used containers. After drums have been washed, the spent solvent is pumped into the waste solvent storage tank. Cleaned containers are filled with product solvent in preparation for the next day's services. Periodically, a tanker truck is dispatched from one of the Safety-Kleen TSDF's to deliver a load of clean solvent and collect the spent solvent at the Branch. Containers of clean solvent may be stored at the return/fill station or in the permitted storage areas. Containers of waste solvent may be stored in the permitted storage areas.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container of the immersion cleaner. The spent solvent remains in the container after delivery to the Branch, where it is stored in a permitted storage area of the warehouse. Periodically, a tanker trailer truck is dispatched from a Safety-Kleen recycle TSDF to deliver fresh solvent and collect the containers of spent solvent for reclamation. Warehouse space is dedicated for the storage of clean immersion cleaner. The immersion cleaner remains in the original covered containers during transfer between the Branch and the TSDF's.

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

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

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

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

10-Day Transfer Storage Area (FRS)

The 10-day transfer storage area is located in northern portion of the main warehouse, and the northwestern return/fill bay. Signage clearly marks these areas. All hazardous waste containers stored in the 10-day transfer area are manifested and in transit to other permitted facilities. Safety-Kleen Sanford is not the designated facility for wastes stored in the 10-day transfer area.

In 1990 Safety-Kleen began offering a service for the collection of spent antifreeze

(ethylene glycol) from automobile service stations. This service is offered in conjunction with Safety-Kleen's used oil collection service. All used antifreeze collected and managed by Safety-Kleen within Florida is recycled. The trucks used to collect and transport waste ethylene glycol are the same trucks used for collection and transport of used oil. The trucks have more than one compartment so the antifreeze is picked up and stored in a separate compartment until off-load at the branch. At the customer locations, Safety-Kleen pumps used ethylene glycol and transports the material to the Branch for off-loading into a tank for storage. The ethylene glycol is held until shipment to be reprocessed into a pure product. This procedure is in accordance with FDEP's *Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. In addition, Safety-Kleen sells its' own Khameleon private label antifreeze in 55-gallons containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is shipped to SK distribution centers, and then shipped to 3rd party recyclers.

In 1996, the Branch became registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the regulations of Florida Administrative Code (FAC) 62-737.400. As a registered storage facility, the Branch can store up to 2,000 Kilograms of lamps/devices for a period of up to 180 days. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as non-hazardous transfer wastes. The boxes are stored at the Branch in a designated area and are labeled in accordance with FAC 62-737.400(5)(b), and partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic. Safety-Kleen handles all types of batteries with the exception of lithium batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting these standards may be managed as 10-day transfer hazardous waste.

Containers of hazardous waste are picked up at customer locations and transported back to the Branch in route trucks. Each route truck is equipped with a hand-truck and electric lift gate for movement of containers. Upon arrival at the Branch, containers are placed on pallets and moved by way of forklift to the appropriate areas. Containers of used parts washer solvent are unloaded at the return/fill area and are dumped by hand into the wet dumpster for transfer via piping to the hazardous waste used solvent tank. Forklifts are used for loading containerized hazardous waste containers onto trucks for transport to Safety-Kleen TSDFs.

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

PART I**D. Operating Information**

3.

Waste Type	Process Design Capacity (Gallons)	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent	20,000	S01* S02**	374	D001 and D-codes listed in Note below
Branch-Generated Liquids Solids (Debris)	6,912	S01*	9	D001 and D-codes listed in Note below; F001, F002, F003, F004, F005
Dumpster Sediment	6,912	S01*	Included above	D001 and D-codes listed in note below
Tank Bottoms	6,912	S01*	Included above	D001 and D-codes listed in note below
Used Immersion Cleaner (IC 699)	6,912	S01*	6	D-codes listed in note below
Dry Cleaning Waste (Perchloroethylene)	6,912	S01*	7	F002 and D-codes listed in note below
Dry Cleaning Waste (Non-perchloroethylene)	6,912	S01*	Included above	D-codes listed in note below
Paint Wastes	6,912	S01*	18	D001, F003, F005 and D-codes listed in note below
Fluid Recovery Service (FRS)	14,080	S01***	100	Transfer wastes-waste codes assigned by generator
Mercury-Containing Lamps/Devices	N/A	N/A***	Less than 2.2	N/A-handled as non-hazardous transfer wastes

NOTES:

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

* This waste will be stored in containers in the container storage area. The maximum capacity in the container storage area for hazardous waste is 6,912 gallons.

** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

*** This waste will be held for transfer in containers in the transfer area and designated mercury bulb storage area.

FIGURE 2.1-1
SITE LAYOUT MAP
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

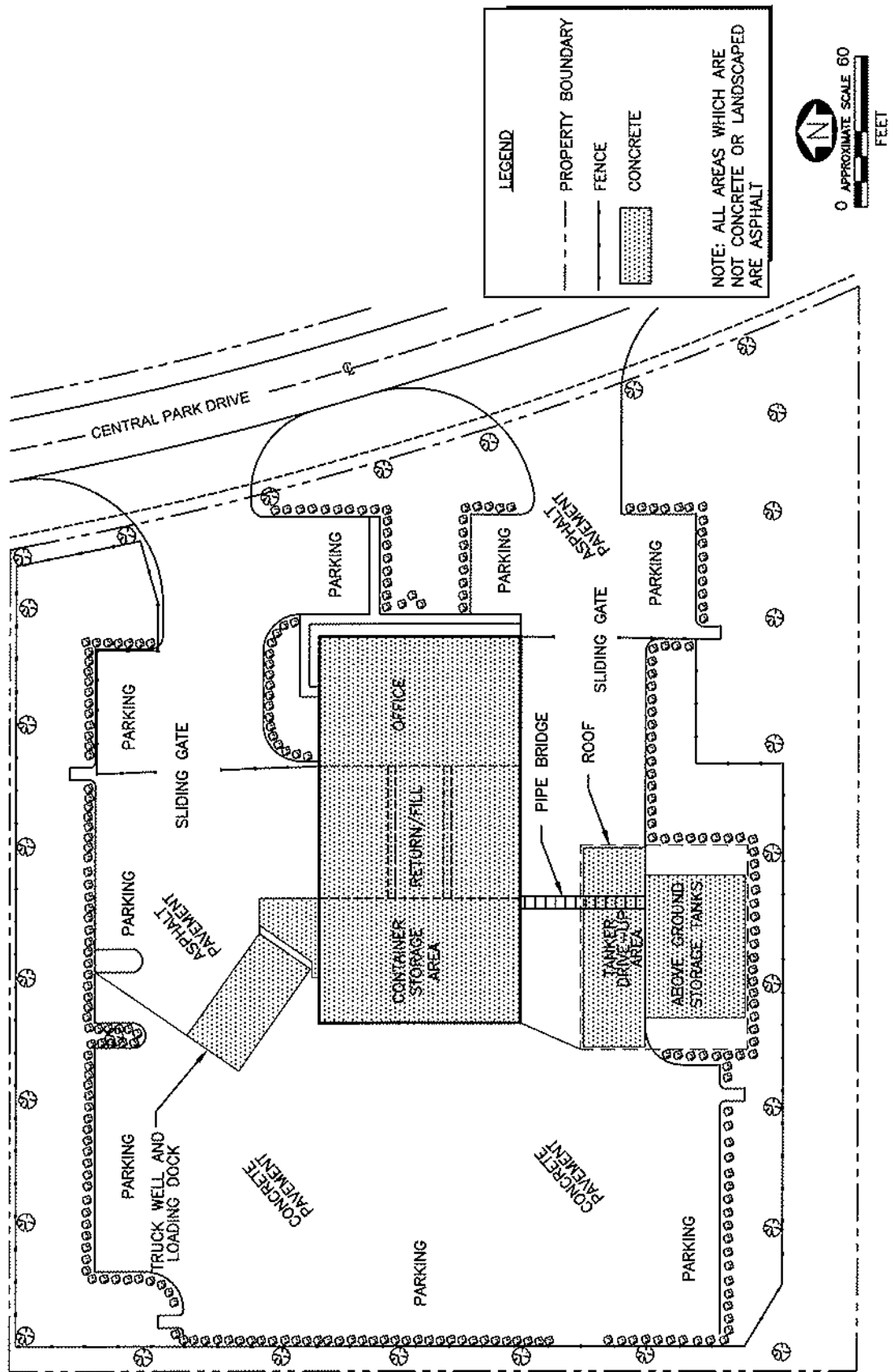


FIGURE 2.1-2
TRUCK TRAFFIC PATTERNS
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

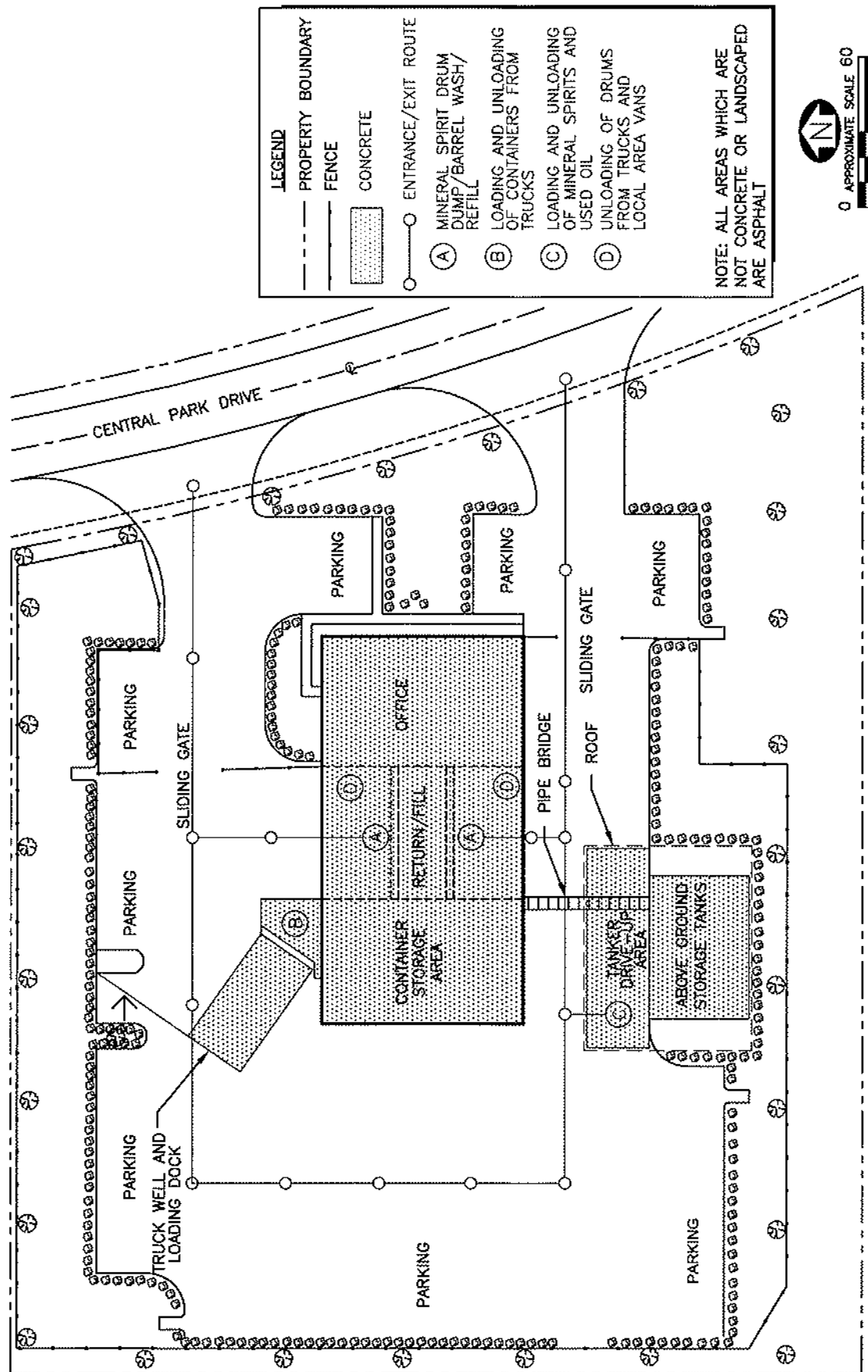
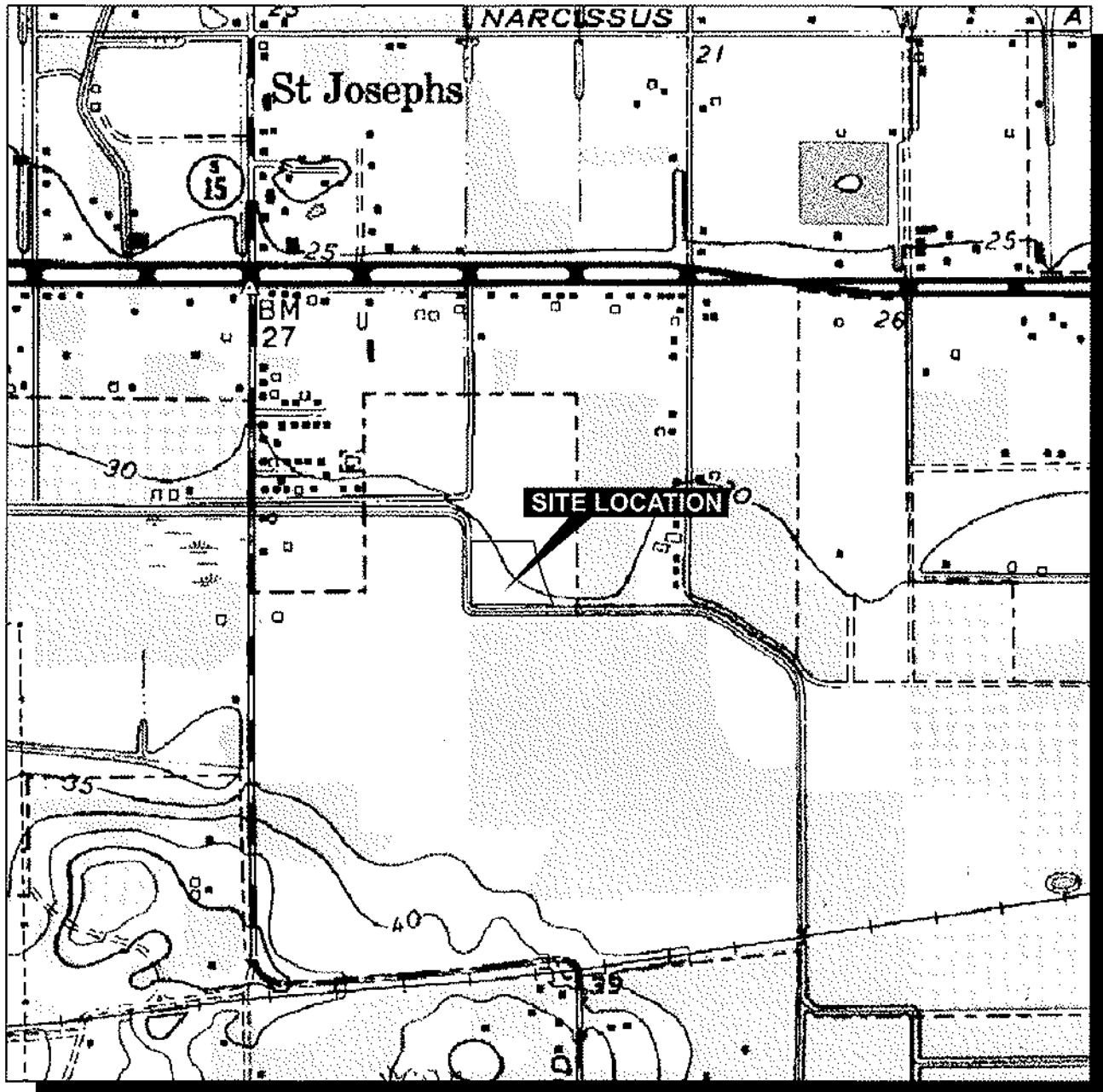
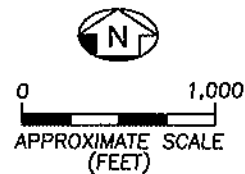


FIGURE 2.2-1
TOPOGRAPHIC MAP
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA



SANFORD QUADRANGLE
FLORIDA
7.5 MINUTE SERIES (TOPOGRAPHIC)
PHOTOREVISED 1988



ERM

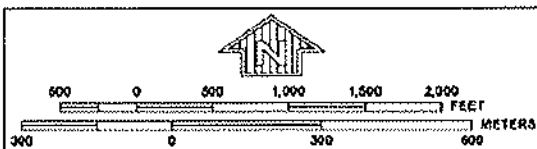
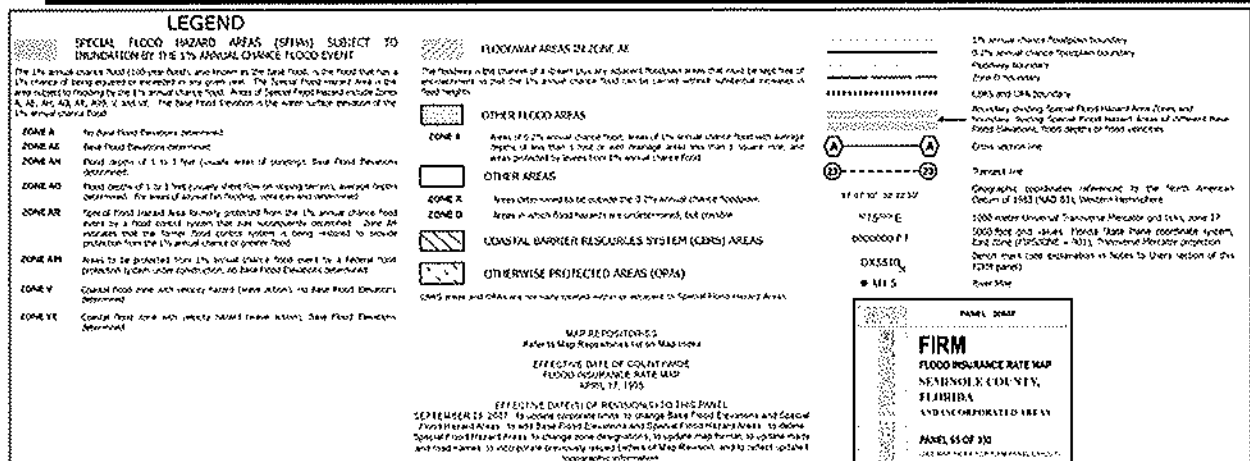
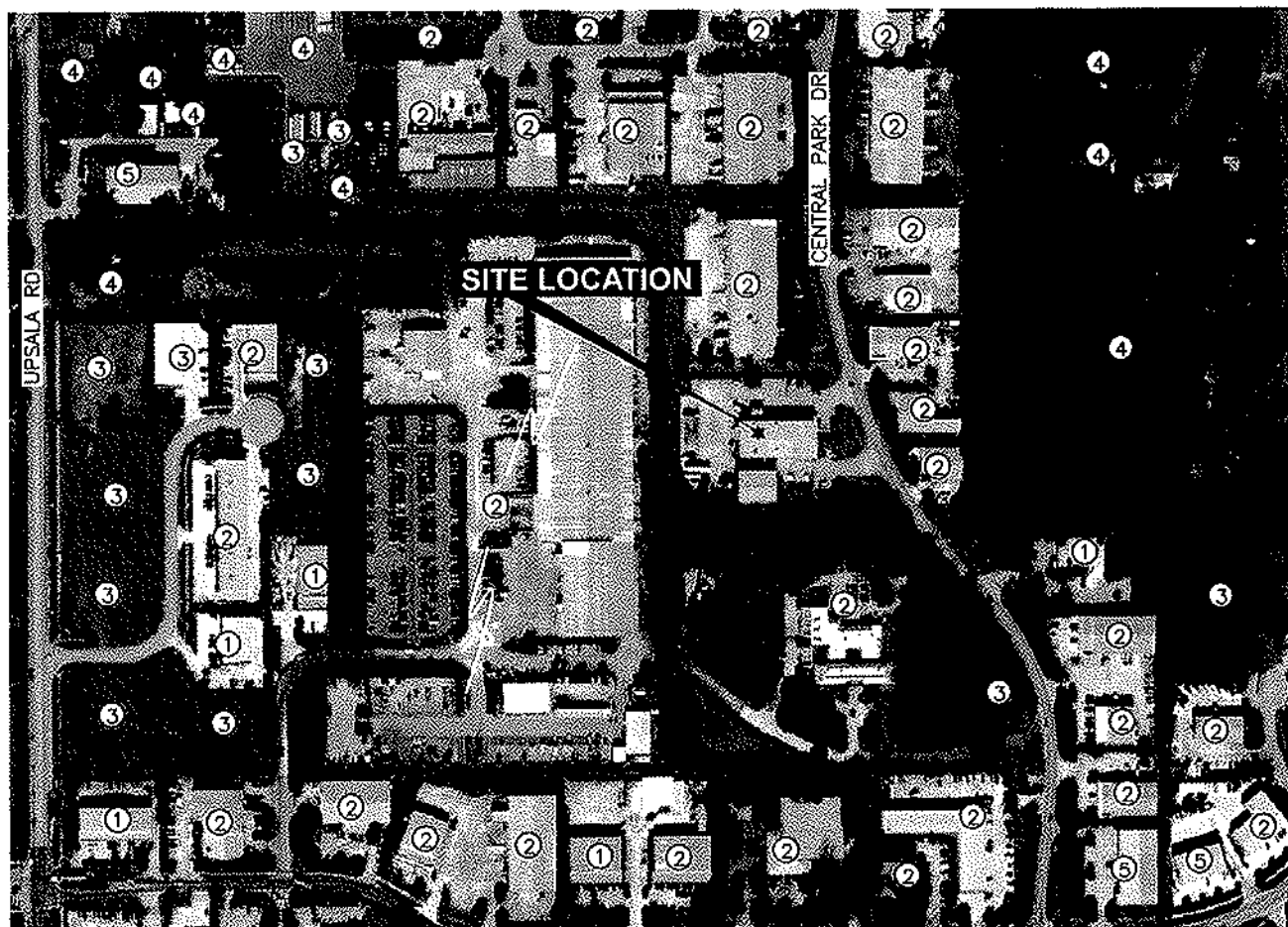


FIG 2.2-2.DWG 10-16-13

FIGURE 2.2-3
SURROUNDING LAND USE MAP
SAFETY-KLEEN SYSTEMS, INC. FACILITY
SANFORD, FLORIDA



SOURCE: GOOGLE EARTH PRO AND SEMINOLE COUNTY PROPERTY APPRAISER.

1	OFFICE BUILDING
2	LIGHT INDUSTRIAL
3	INDUSTRIAL
4	RESIDENTIAL
5	WAREHOUSE

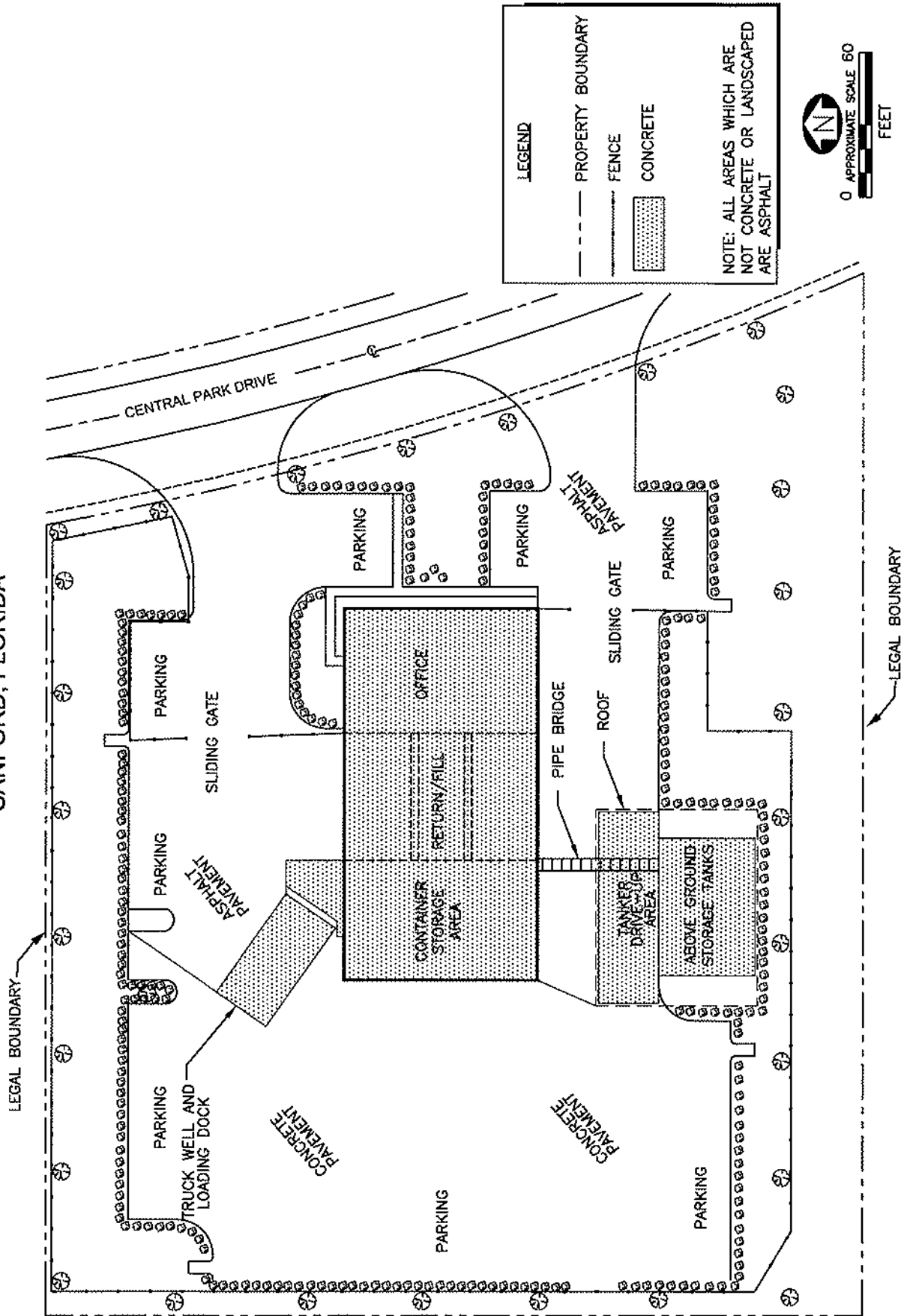


SCALE IN FEET
0 100 200 400



ERM.

FIGURE 2.2-4
LEGAL BOUNDARY OF THE FACILITY
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA



SCIENCE 1820

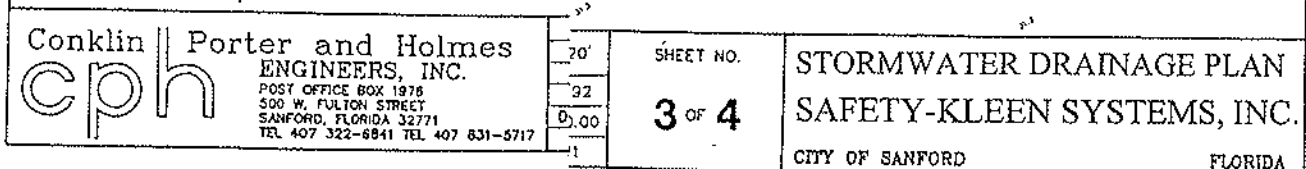


FIGURE 2.2-6
LOCATIONS OF HAZARDOUS WASTE MANAGEMENT AREAS
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

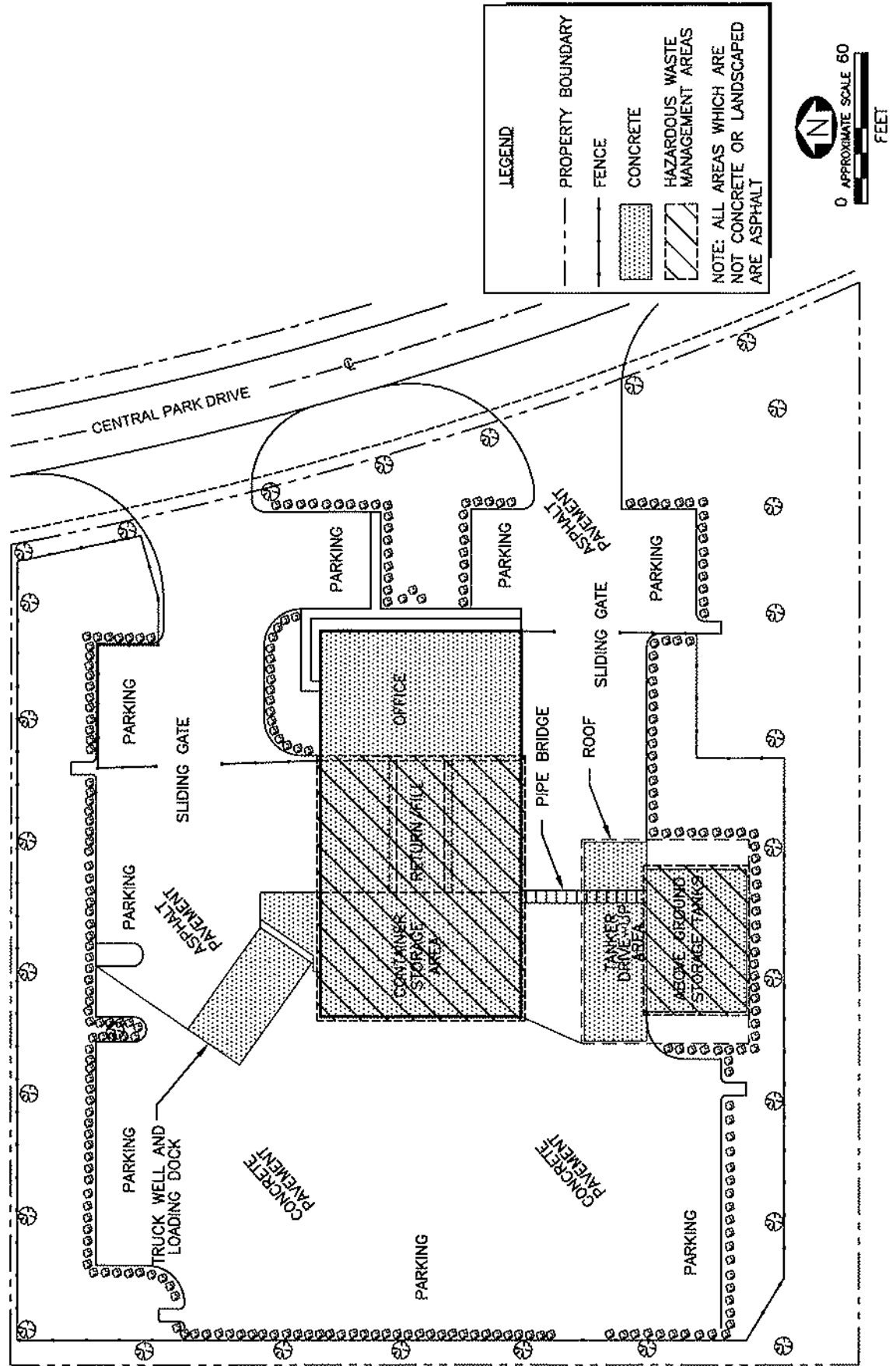
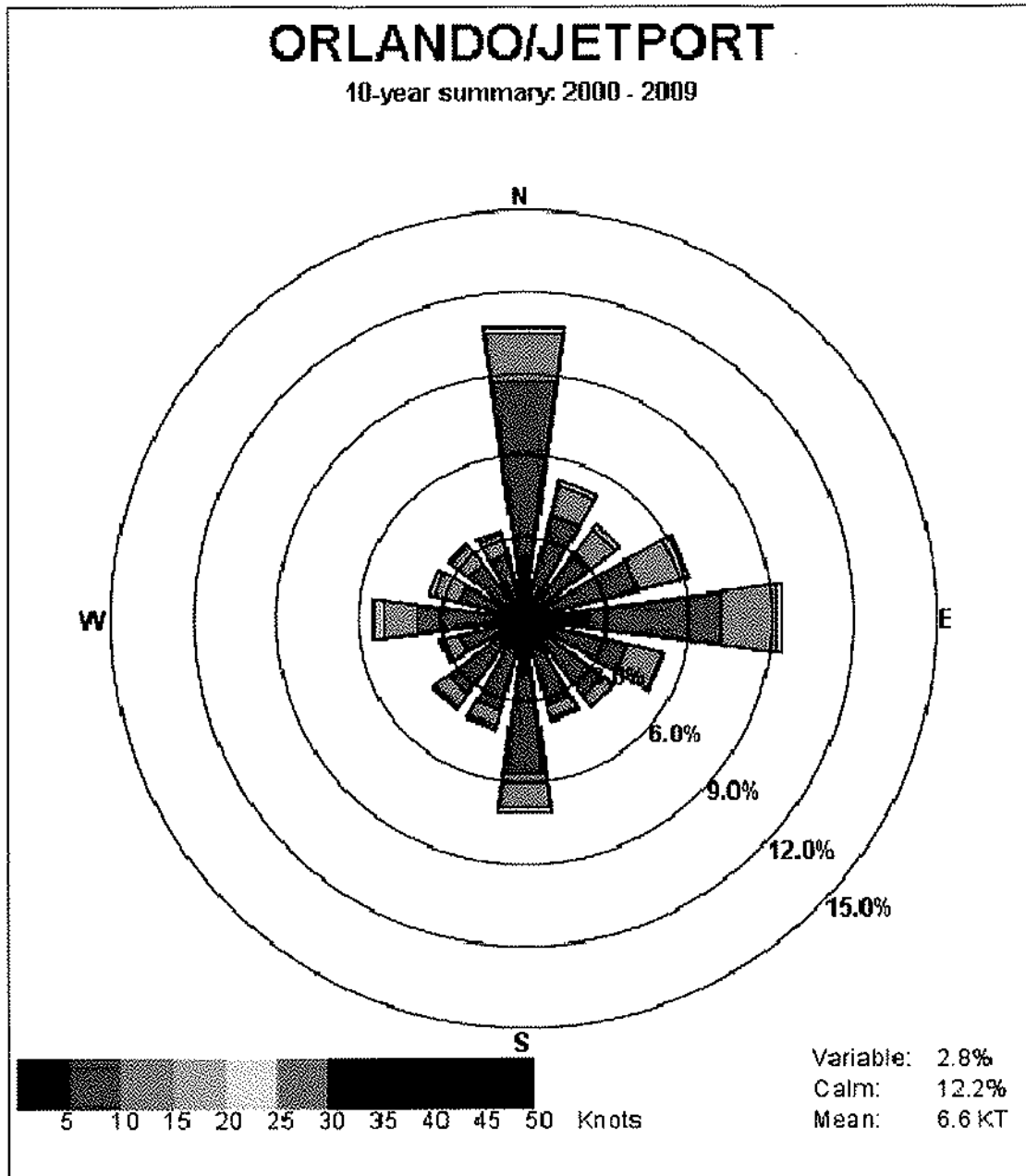


FIGURE 2.2-7
WIND ROSE
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA



Source: National Weather Service Weather Forecast Office
<http://www.srh.noaa.gov/mlb/?n=windrose>

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**APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT
CERTIFICATION
TO BE COMPLETED BY ALL APPLICANTS**

Signature and Certification

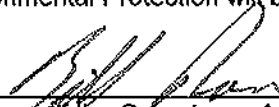
Facility Name Safety-Kleen Systems, Inc.

EPA/DEP I.D. No. FLD 984 171 165

The following certifications must be included with the submittal of an application for a hazardous waste authorization. The certifications must be signed by the owner of a sole proprietorship; or by a general partner of a partnership; or by a principal executive officer of at least the level of vice president of a corporation or business association, or by a duly authorized representative of that person. If the same person is a facility operator, facility owner, and real property owner, that person can cross out and initial the signature blocks under "1. Facility Operator" and "2. Facility Owner," and add the words "Facility Owner and Operator" at the line "Signature of the Land Owner or Authorized Representative."

1. Facility Operator

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules of the Department of Environmental Protection. It is understood that the permit is only transferable in accordance with Chapter 62-730, Florida Administrative Code (F.A.C.), and, if granted a permit, the Department of Environmental Protection will be notified prior to the sale or legal transfer of the permitted facility.


Signature of the Operator or Authorized Representative*

Bill Ross Vice President of EHS

Name and Title (Please type or print)

Date 10/16/13

E-mail address bill.ross@safety-kleen.com


Telephone (406) 468-9192

- Attach a letter of authorization

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2. Facility Owner

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, operate, or conduct remedial activities at a hazardous waste management facility on the property as described. As owner of the facility, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, and all rules of the Department of Environmental Protection.


Signature of the Facility Owner or Authorized Representative*

Bill Ross Vice President of EHS

Name and Title (Please type or print)


Date 10/16/13 E-mail address bill.ross@safety-kleen.com

Telephone (406) 468-9192

* Attach a letter of authorization

3. Land Owner

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit for the construction, operation or postclosure of a hazardous waste management facility on the property as described. For hazardous waste facilities that close with waste in place, I further understand that I am responsible for providing the notice in the deed to the property required by 40 CFR 264.119 and 265.119, as adopted by reference in Chapter 62-730, F.A.C.


Signature of the Land Owner or Authorized Representative*

Bill Ross Vice President of EHS

Name and Title (Please type or print)

Date 10/16/13 E-mail address bill.ross@safety-kleen.com

Telephone (406) 468-9192

* Attach a letter of authorization



A Clean Harbors Company

Signatory Authority
Florida Administrative Code §62-730.220(8)
Applications for Permits and Other Authorizations

I, Billy Ray Ross Jr., Professional Engineer and Vice President of Environmental Health & Safety for all Safety-Kleen Systems, Inc. Branch Facilities in North America, hereby certify that I am authorized to sign all documents under 40 CFR §270.11 and Florida Administrative Code §62-730.220, including all Applications for Permits and Other Authorizations.

January 1, 2013

Billy R. Ross, P.E. Vice President of EHS

Date

bill.ross@safety-kleen.com

406.468.9192 (o) | 530.304.6915 (c) | 786.551.5733 (f)

safety-kleen®

A Clean Harbors Company

40 CFR § 270.11 Signatories to permit applications and reports.

(a) Applications. All permit applications shall be signed as follows:

(1) For a corporation: By a responsible corporate officer. For the purpose of this section, a responsible corporate officer means (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decisionmaking functions for the corporation, or (ii) the manager of one or more manufacturing, production or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(b) Reports. All reports required by permits and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in paragraph (a) of this section;

(2) The authorization specifies either an individual or a position having responsibility for overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and

(3) The written authorization is submitted to the Director.

Florida Administrative Code §62-730.220(8) Applications for Permits and Other Authorizations.

All applications for an authorization shall be certified by the facility owner, facility operator, and real property owner. The determination of the proper person to sign applications as owner, operator and real property owner shall be made in accordance with the provisions of 40 CFR 270.11.


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4 Professional Engineer Registered in Florida

Complete this certification when required to do so by Chapter 471, F.S., or when not exempted by Rule 62-730.220(7), F.A.C.

This is to certify that the engineering features of this hazardous waste management facility have been designed or examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Safety-Kleen Systems, Inc. – Sanford Branch Renewal Application


Signature

Robert W. Fox
Name (please type)

Florida Registration Number 40980

Mailing Address 10210 Highland Manor Drive, Suite 140
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Date November 7, 2013 E-mail address bob.fox@erm.com

Telephone (813) 357-3888

(PLEASE AFFIX SEAL)


11/7/13

Part II

A. General

1. SITE TOPPOGRAPHY AND SURROUNDING LAND USE

Figure 2.2-1 is a USGS topographic map showing the facility per 40 CFR Part 270.14(b)(19). Due to the small size of the site, all of the information requested in FDEP's application form cannot be place on one map. Therefore, additional maps are provided here to present the additional information requested in the application form. Specific information requested in the permit application is provided below.

100-Year Floodplain Area

Based on information available from the Federal Emergency Management Agency (Figure 2.2-2), the facility does not lie within the 100-year flood plain. This site is located in Zone C, which is an area of minimal flooding.

Surface Water Bodies Within One-Quarter Mile of the Facility Property Boundary (e.g., Intermittent Streams and Springs)

Surface water bodies located within one-quarter mile of the facility property boundary include Smith Canal, which runs along the western and southern boundaries of the site, as shown in Figure 2.2-1. There are two lakes, one to the northwest, and the other to the southwest of the site.

Surrounding Land Uses

Surrounding land uses are shown in Figure 2.2-3.

Legal Boundaries of the Facility

Figure 2.2-4 shows the property boundaries

Drinking Water Wells Listed In Public Records or Otherwise Known to the Applicant Within One-Quarter Mile of the Facility Property Boundary

A well survey is found on Figure 2.2-8. The information was obtained from the St. John's River Water Management District (SJRWMD).

Intake and Discharge Structures Within One Mile

There are no known intake or discharge structures within one mile.

Run-Off Control System

The facility's paved areas are sloped such that rainwater run-off is directed to the retention swales on the north and south sides of the property. Figure 2.2-5 illustrates the contours and anticipated surface water run-off direction. Overflow will discharge into the Smith Canal. Seepage from the swales percolates into the ground water and then into the same canal.

Access Control (fences, gates, etc.)

Figure 2.1-1 shows access control features.

Injection and Withdrawal Wells Both On Site and Off Site

There are no injection or withdrawal wells on site. To the best of Safety-Kleen's knowledge, there are no known injection or withdrawal wells within one-quarter mile of the facility.

Buildings and Other Structures

Buildings and other structures are shown in Figure 2.1-1.

Contours Sufficient to Show Surface Water Flow

Figure 2.2-5 shows surface water flow direction at the facility. The site is nearly flat, with surface elevations in unpaved areas. Paved areas are at slightly higher elevations. Surface water flow is directed toward the drainage catchment basins shown in Figure 2.2-5.

Loading and Unloading Areas

Figure 2.1-2 shows loading and unloading areas in relation to the waste management areas.

Hazardous Waste Units

Figure 2.2-6 shows hazardous waste management units.

Wind Rose

A wind rose for Orlando, Florida is shown in Figure 2.2-7.

FACILITY LAYOUT AND TRAFFIC PATTERNS

The facility layout is shown in Figure 2.1-1. The non-building areas of the facility are paved with asphalt or concrete as noted on the site plan. The storm water retention areas and other unpaved areas are vegetated with grass. Site photographs are provided in Appendix A.

Site traffic patterns are illustrated in Figure 2.1-2. The majority of the vehicular traffic and loading/unloading operation occurs at and near the return/fill area (Area A), which is paved with asphalt and concrete. Approximately once per week a tractor trailer delivers containerized product and removes containerized waste for transfer to a Safety-Kleen TSDF. This truck backs up to the concrete dock, located on the northwestern side of the facility in Area B, to load waste containers and unload product for the branch.

Area A & D are used for the loading/unloading of transfer wastes, and containerized permitted wastes from local vans and trucks. The trucks dispatched from the recycle center to deliver parts washer solvent and pick up used parts washer solvent will perform these activities at the Tanker Drive-Up Area (Area C) approximately once per week. Truck-to-building transfer of Fluid Recovery Service (FRS) wastes will occur on concrete surfaces within the compound (Areas A, B, and D).

U.S. 46 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 heavy industrial activities in this area. The vans that travel the routes daily between the service center and Safety-Kleen customers use the two-lane road within the industrial park (Central Park Drive). Traffic from this facility will have a minor impact on local traffic conditions.

Part II

A. General

2. FINANCIAL ASSURANCE FOR CLOSURE

Safety-Kleen is the operator of the Sanford, Florida Branch. Financial assurance is provided through the use of the financial test specified in Subpart H of 40 CFR Part 264.143. Per 40 CFR Part 264.142 closure cost estimates are provided here.

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Branch Service Center, Sanford, Florida

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
1. PROJECT COORDINATION AND SCHEDULING				
<u>Prime Contractor Costs</u>				
- Obtain subcontractor quotes and coordinate activities with subcontractor prior to implementing closure	Project Manager	\$94	10	\$940
- Coordinate scope and schedule of project activities with owner/operator, decontamination contractor, regulatory agencies and analytical laboratory	Project Manager	\$94	10	\$940
- Review facility permit and closure plan	Project Manager	\$94	6	\$564
	Field Engineer	\$60	6	\$360
- Prepare project/site specific Health and Safety Plan	Health/Safety Specialist	\$80	6	\$480
- Prepare project activity and project status reports	Project Manager	\$94	4	\$376
	Office Expenses	\$100	1	\$100
	Miscellaneous Expenses	\$100	1	\$100
Activity 1. Subtotal				\$3,860
2. MOBILIZE TO SITE AND PREPARE FOR CLOSURE				
<u>Assumptions</u>				
- Waste mineral spirits tank is full (20,000 gallons)				
- Maximum capacity 155 gallons of sediment per drum washer = 155 x 2 = 310 gallons = 6 - 55 gallon drums				
- One CSA will be closed with maximum capacity of 6912 gallons = 127 - 55 gallon drums.				
<u>Prime Contractor Costs</u>				
- Mobilize Prime Contractor (round trip = 2)	Project Manager	\$503	2	\$1,006
	Field Engineer	\$503	2	\$1,006
- Project Management and Supervision and participate in on-site coordination meeting with owner/operator and subcontractors	Project Manager	\$94	8	\$752
	Vehicle (per day)	\$50	1	\$50
	Per diem	\$95	1	\$95
- Supervise waste loading activities	Field Engineer	\$60	8	\$480
	Vehicle (per day)	\$50	1	\$50
	Per diem	\$95	1	\$95
- Purchase 6 55 gallon drums for drum washer sediment	55-gallon Drums	\$65	6	\$428
<u>Subcontractor Costs</u>				
- Subcontractor mobilization (round trip = 2)	Mobilize	\$1,781	2	\$3,918
- Subcontractor per diem (total project 3 persons x 7 days)	Per Diem	\$95	21	\$2,195
- Subcontractor PPE (includes tyvek, respirator, cartridges, boot, gloves etc for 3-man crew)	Equipment/Consumables	\$1,311	LS	\$1,442
- Transfer tank contents to tankers	Labor/equipment/expenses	\$0.33	20000	\$7,260
- Transport waste mineral spirits to a TSD for treatment/disposal Assumes 2 tanker trailers required to remove 12,000 gallons (5,000 gallons max each load) Estimated cost per mile = \$1.81/mile + markup, overhead and profit = \$2.52/mile Estimated mileage = 500 miles	Transport 4 trailers x 500 miles	\$2.52	2000	\$5,040
Estimated disposal/treatment cost (per gallon)	TSD @ \$0.56/gallon (ETC cost)	\$0.560	20000	\$11,200
- Transfer drum washer sediment to drums	Labor/equipment/expenses	\$0.97	310	\$331
- Transfer drums of drum washer sediment to trucks with forklift (unit is based on total drums divided by 4 drums per pallet)	Labor/equipment/expenses	\$37	2	\$61
- Transfer drums from CSA to trucks with forklift (unit is based on total drums divided by 4 drums per pallet)	Labor/equipment/expenses	\$37	32	\$1,302
- Transfer drums from Flammable Materials Storage Shed to trucks with forklift (unit is based on total drums divided by 4 drums per pallet)	Labor/equipment/expenses	\$37	0	\$0
- Transport drums to TSD for Treatment/Disposal Assumes 2 trucks to transport drums (84 per truck max) Estimated cost per mile = \$2.21/mile + markup, overhead and profit = \$3.06/mile Estimated mileage = 500 miles	Transport 2 trailers x 500 miles	\$3.06	1000	\$3,366
Estimated disposal/treatment cost (per drum) (ETC 2004)	TSD @ \$107/drum (ETC cost)	\$107	133	\$14,231
Activity 2. Subtotal				\$54,309

Table 1. Closure Cos Estimate Worksheet, Safety-Kleen Branch Service Center, Sanford, Florida

		Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
Activity	Category			
3. STORAGE TANK DECONTAMINATION AND REMOVAL				
<u>Assumptions:</u>				
- The tank, piping and appurtenant equipment are removed and scrapped				
- Rinsate sampling is not necessary because the tank will be scrapped				
- Includes decontamination of the containment area				
- 1 day to decontaminate AST and containment, 1 day to remove AST and scrap				
- Assumes containment area to remain in place following decontamination				
- Assumes 1 rinsate sample required to leave containment in place				
- Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection.				
<u>Prime Contractor Costs</u>				
- Project Management and Supervision	Project Manager	\$94	8	\$752
	Vehicle (per day)	\$50	1	\$50
	Per diem	\$95	1	\$95
- Supervise Storage Tank Decontamination and Removal Activities	Field Engineer	\$60	16	\$960
	Vehicle (per day)	\$50	2	\$100
	Per diem	\$95	2	\$190
	Air monitoring equipment	\$404	1	\$404
- Collect soil samples	Sample Technician	\$60	4	\$240
	Vehicle (per day)	\$50	0.5	\$25
	Per diem	\$95	0.5	\$48
	Sample supplies/shipping	\$250	LS	\$250
<u>Subcontractor Costs</u>				
- Disconnect electrical appurtenances	Labor/equipment	\$750	LS	\$825
- Decontaminate waste AST, piping and appurtenant equipment (unit cost based on pressure washing 40 sq ft/hour in level B PPE and 1222 sq ft. Equipment includes pressure washer and operation costs (per day)	Labor	\$3.65	1222	\$4,906
	Equipment	\$187	LS	\$206
- Decontaminate containment area (unit cost based on pressure washing 200 sq ft per hour (level C PPE) and 3268 sq ft) Equipment includes pressure washer and operation costs (per day)	Labor	\$1.11	3990	\$4,872
	Equipment	\$187	LS	\$206
- Remove AST from containment Includes certificate of destruction for UST	Labor/equipment/expenses	\$3,601	LS	\$3,961
<u>Laboratory Subcontractor Costs</u>				
- Analyze 1 rinsate sample from containment area for VOCs, SVOCs and TAL metals	VOCs @ \$147/sample SVOCs @ \$265/sample Metals @ \$336/sample Total per sample cost	\$748	1	\$823
- Analyze 2 soil samples for VOCs, SVOCs, and Metals (8)	VOCs @ \$147/sample SVOCs @ \$265/sample Metals @ \$97/sample Preserved Sample Containers @ \$10/sample Total per sample cost	\$519	3	\$1,713
Activity 3, Subtotal				\$20,624

Table 1. Closure Cos Estimate Worksheet, Safety-Kleen Branch Service Center, Sanford, Florida

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
4. DECONTAMINATE THE RETURN/FILL STATION				
<u>Assumptions:</u>				
- Decontamination shall consist of washing with detergent/water solution and rinsing with high-pressure spray				
- Return/Fill structure and dock area will remain in place				
- Rinsate sampling is not necessary because the drum washers will be scrapped				
- Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection				
- Square footage used for decontamination includes containment				
<u>Prime Contractor Costs</u>				
- Inspect containment for cracks, gaps, or other potential lapses of integrity (P.E. or designee)	Project Engineer	\$94	8	\$752
	Vehicle (per day)	\$50	1	\$50
	Per diem	\$95	1	\$95
- Fill cracks and gaps (if necessary) prior to implementing decontamination activities	Field Engineer	\$60	4	\$240
	Vehicle (per day)	\$50	0.5	\$25
	Per diem	\$95	0.5	\$48
- Supervise washing of R/F Station and associated components (i.e. piping, pumps, and appurtenances)	Field Engineer	\$60	16	\$960
	Vehicle (per day)	\$50	2	\$100
	Per diem	\$95	2	\$190
- Collect 2 soil samples for analysis of VOCs, SVOCs and metals	Field Engineer	\$60	4	\$240
	Vehicle (per day)	\$50	0.50	\$25
	Per diem	\$95	0.50	\$48
- 4 hrs total for sampling	Sample supplies	\$250	LS	\$250
<u>Subcontractor Costs</u>				
- Decontaminate drum washers, grating, containment and piping (unit cost based on pressure washing 4400 sq ft total surface area) Equipment includes pressure washer and operation costs/day	Labor	\$2.92	6780	\$21,777
	Equipment	\$375	LS	\$413
- Remove drum washers, ancillary equipment and scrap	Labor/equipment/expenses	\$1,800	LS	\$1,980
<u>Laboratory Subcontractor Costs</u>				
- Analyze 2 soil samples for VOCs, SVOCs, and Metals (8)	VOCs @ \$147/sample			
	SVOCs @ \$265/sample			
	Metals @ \$97/sample			
	Preserved Sample Containers @ \$10/sample			
	Total per sample cost	\$519	2	\$1,142
Activity 4. Subtotal				\$28,334

Table 1. Closure Cos Estimate Worksheet, Safety-Kleen Branch Service Center, Sanford, Florida

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
5. DECONTAMINATE CONTAINER STORAGE AREA				
<u>Assumptions:</u>				
- One CSA with total capacity of 6912 gallons/3867 sq ft				
- Decontamination shall consist of washing with a detergent water solution and rinsing with a high-pressure spray				
- CSA remains in-place following closure				
- Decontamination of CSA includes floor, curbing and containment trenches, requires approximately 1 day.				
- Any ramps leading into the storage areas (if present) will also be decontaminated.				
- Assumes 1 rinsate and 2 soil samples required. Actual number of soil samples will be based on engineer's inspection.				
<u>Prime Contractor Costs</u>				
- Inspect the floor of each CSA for cracks, gaps, or other potential lapses of integrity (P.E. or designee)	Project Engineer	\$94	8	\$752
	Vehicle (per day)	\$50	1	\$50
	Per diem	\$95	1	\$95
- Fill cracks and gaps (if necessary) prior to implementing decontamination activities	Field Engineer	\$60	4	\$240
	Vehicle (per day)	\$50	0.5	\$25
	Per diem	\$95	0.5	\$48
- Supervise and document decontamination of CSA	Field Engineer	\$60	8	\$480
	Vehicle (per day)	\$50	1	\$50
	Per diem	\$95	1	\$95
- Collect sample of final rinsate from each CSA and submit for laboratory analysis	Field Engineer	\$60	4	\$240
	Vehicle (per day)	\$50	0.5	\$25
	Per diem	\$95	0.5	\$48
- Collect 2 soil samples for analysis of VOCs, SVOCs and metals	Field Engineer	\$60	4	\$240
	Vehicle (per day)	\$50	0.5	\$25
	Per diem	\$95	0.5	\$48
	Sample supplies	\$250	LS	\$250
<u>Subcontractor Costs</u>				
Decontaminate container storage area (unit cost based on pressure washing 105 sq ft per hour and 3867 sq ft)	Labor	\$1.11	3867	\$4,722
Equipment includes pressure washer and operation costs (1/2/ day)	Equipment	\$187	LS	\$206
<u>Laboratory Subcontractor Costs</u>				
- Analyze 1 rinsate sample from containment area for VOCs, SVOCs and TAL metals	VOCs @ \$147/sample			
	SVOCs @ \$265/sample			
	Metals @ \$336/sample			
	Total per sample cost	\$748	1	\$823
- Analyze 2 soil samples for VOCs, SVOCs, and Metals (8)	VOCs @ \$147/sample			
	SVOCs @ \$265/sample			
	Metals @ \$97/sample			
	Preserved Sample Containers @ \$10/sample			
	Total per sample cost	\$519	2	\$1,142
Activity 5. Subtotal				\$8,849

Table 1. Closure Cos Estimate Worksheet, Safety-Kleen Branch Service Center, Sanford, Florida

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
[ONLY INCLUDE ACTIVITY 6 IF SITE HAS A FLAM SHED SUBJECT TO CLOSURE. IF NOT, DELETE THIS ACTIVITY AND RENUMBER REMAINING ACTIVITIES]				

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Branch Service Center, Sanford, Florida

		Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
Activity	Category			
7 CLOSURE CERTIFICATION REPORT				
<u>Assumptions:</u>				
- Closure certification report signed by a State Registered P.E. and owner/operator				
- Closure results verify clean closure				
<u>Prime Contractor Costs</u>				
- Compile field notes, photographs, manifests and other documentation	Project Manager	\$94	4	\$376
	Field Engineer	\$60	8	\$480
- Compile any rinsate, and/or soil sample data into summary tables	Project Manager	\$94	8	\$752
	Field Engineer	\$60	8	\$480
- Prepare Closure Certification Report	Project Manager	\$94	20	\$1,880
	Field Engineer	\$60	8	\$480
- Prepare closure certification statement	Project Engineer	\$94	4	\$376
- Office Expenses	Drafting/Clerical	\$42	4	\$168
	Miscellaneous/Copying/Postage	\$150	LS	\$165
Activity 7 Subtotal				\$5,157
COST ESTIMATE ACTIVITIES SUMMARY				
1. PROJECT COORDINATION AND SCHEDULING				\$3,880
2. MOBILIZE TO SITE AND PREPARE FOR CLOSURE				\$54,309
3. STORAGE TANK DECONTAMINATION AND REMOVAL				\$20,624
4. DECONTAMINATE THE RETURN/FILL STATION				\$28,334
5. DECONTAMINATE CONTAINER STORAGE AREA				\$8,849
6 CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				\$11,626
7 CLOSURE CERTIFICATION REPORT				\$5,157
Subtotal				\$132,760
LOCATION FACTOR FOR ECHOS RATES (Location factor for zip code 32771 is 0.83)				0.83
TOTAL CLOSURE COST ESTIMATE (Adjusted for location)				\$110,191
15% Contingency				\$16,529
Total				\$126,720

Notes:

- Prime Contractor, Decontamination Subcontractor labor rates, Transportation, Equipment and Analytical rates obtained from Environmental Cost Handling Options and Solutions (ECHOS) Environmental Remediation Cost Data, 12th Edition, 2006
- Prime contractor labor rates include overhead (20%), profit (20%) and markup (50%)
- Subcontractor labor rates include overhead (5%) and profit (10%)
- A 10% markup was applied to subcontractor prices
- Assumes waste inventory and decontamination wastes transported to an appropriate TSD Facility, which is assumed to be located within 500 miles (for purposes of estimating mileage only)
- Waste inventory disposal/treatment unit cost obtained from Environmental Technology Council, Fuels Blending Prices May 2004, and includes the low cost for bulk liquids (\$0.56/gallon) based on suitability of mineral spirits for fuel, and average cost (\$107/drum) for drummed wastes (<http://etc.org/costsurvey8.cfm>)
- Location Factor is not applied to Waste Disposal costs derived from ETC

Part II

A. General

4. FACILITY SECURITY

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 topped with barbed wire.
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".
4. "NO SMOKING" signs are posted in areas where hazardous wastes are handled.

***SAFETY-KLEEN SYSTEMS, INC.
SANFORD FACILITY***

***PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND
EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS***

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***PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND EMERGENCY
PROCEDURES FOR DAILY BUSINESS OPERATIONS***

GENERAL INFORMATION

Purpose

The preparedness, prevention, and contingency plan and emergency procedures are designed to comply with 40 CFR Part 264.50-56. In addition, the procedures in the plan ensure that Safety-Kleen reduces the possibility of emergency situations and, should they occur, respond in a manner to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous material constituents to the air, soil, surface water, or ground water at the facility.

The provisions of the plan are to be carried out immediately if there is a fire, explosion, or release of hazardous materials that could threaten human health or the environment. All responses must conform to the procedures contained in this plan.

General Description of Activities

The business activities conducted at the Sanford Branch relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provisions of a solvent leasing service for the customers. Clean solvents are distributed from, and the used solvents returned to, the Branch, where separate storage tanks are utilized for the storage of clean and used parts washer solvent. One 20,000-gallon fresh parts washer solvent storage tank currently is utilized at the facility. In addition, a 20,000-gallon tank is used to contain hazardous waste solvent, two 20,000-gallon tanks are used for storage of Used Oil, and a 12,000-gallon tank (double-walled) is used for storage of used antifreeze. Warehouse space is designated for the storage of containers of both clean and used immersion cleaner, parts washer solvent, paint waste, Fluid Recovery Services (FRS) wastes, and dry cleaning wastes. Over-pack containers are used for the management of containers whose integrity has been compromised.

Parts washer solvents are transported in covered containers between the Branch and customers. Upon returning to the Branch, the used parts washer solvent is transferred from the containers into a wet dumpster (solvent return receptacle) in which coarse solids in the parts washer solvents are retained. Used parts washer solvent from the wet dumpster flows into a 20,000-gallon aboveground tank for storage. Hazardous waste parts washer solvent is picked up regularly by a bulk tank truck from a Safety-Kleen TSDF, which at the same time delivers clean parts washer solvent. The sludge in the wet dumpster is regularly cleaned out, containerized, and stored as Branch generated waste in a permitted waste storage area for later shipment to a permitted Safety-Kleen TSDF for reclamation or disposal.

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

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

All antifreeze collected and managed by Safety-Kleen within Florida is recycled. At the customer's location, Safety-Kleen pumps used ethylene glycol (antifreeze) into a Safety-Kleen used oil tanker truck. The SK collection trucks have more than one compartment so the antifreeze is picked up and stored in a separate compartment until off-load at the branch. The used antifreeze is transported from the customer site to the branch for storage until shipment to be reprocessed into a pure product. This procedure is in accordance with FDEP's Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities, dated May 22, 2012. In addition, Safety-Kleen sells its' own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is shipped to SK distribution centers, and then shipped to 3rd party recyclers.

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

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

The waste products exhibit essentially the same biological, physical, and chemical properties as the fresh product. Used products are basically fresh products with impurities of dirt and metals. Material Safety Data Sheets (MSDSs) for each hazardous material are available at the Branch and on demand by fax through a company-owned MSDS information service. This service provides 24-hour phone or fax access to an extensive MSDS database.

The Branch is registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the requirements of Florida Administrative Code (FAC) 62-737.400, including all training requirements. Route trucks handling these materials are equipped with mercury clean up kits. As a registered storage facility, the Branch can store up to 2,000 kilograms of lamps/devices for a period of up to 180 days. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as nonhazardous transfer wastes. The boxes are stored at the Branch in a designated area within the transfer waste storage area. This storage area is labeled in accordance with FAC 62-737.400(5)(b), and is partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic. Figures 5.1-1 and 5.1-2 show the basic site and floor plans and the locations of waste management facilities and facility storage.

Table 5.1-1 provides information regarding permitted and transfer wastes handled at the facility.

Safety-Kleen handles all types of batteries with the exception of lithium batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting these standards may be managed as 10-day transfer hazardous waste.

Note: All waste containers are unloaded within 72 hrs. of arrival at the facility and all waste containers are shipped outbound within 72 hrs. of being loaded for shipment.

INSPECTION PROCEDURES

Inspection of Safety Equipment

The purpose of the inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of emergency and spill control equipment to ensure proper operation, and to maintain compliance. Table 5.2-1 is an Inspection Schedule.

The Branch Manager or designee is responsible for carrying out the inspection in accordance with the following procedure and schedule.

- A weekly inspection of fire extinguishers must be performed to ensure that the tag date has not expired and the units are properly charged and accessible.
- A weekly inspection of eyewash stands must be performed to assure accessibility, and proper operation of this equipment. Inventory of the first-aid kit must be checked on a weekly basis.
- A weekly check of the supply of spill control equipment (absorbent material) must be performed.
- A weekly check of the conditions and inventory of other emergency equipment will be made. This includes gloves, aprons, goggles, respirators, and other personal protective equipment.

Inspection of Security Equipment

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

Inspection of Waste Management Facilities

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

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

Daily inspections of aboveground tanks will include the following:

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

- Inspect transfer pumps for leaking seals and overheated motors.
- Inspect the solvent dispensing hose, fittings, and valve for any leaks, damage, or wear that could cause a leak to develop.
- Inspect the valves for proper seat. Stem leaks from worn glands and warped valve bodies should be repaired. If the valve cannot be repaired, replace the unit.

Also, the tanks will be visually inspected and tested periodically.

Daily inspection of the solvent return receptacle (wet dumpster) will consist of an inspection for leaks and excess dumpster mud build-up.

Daily inspections of the container storage area include the following:

- Verify that total volume is within permitted limits.
- Physically examine the condition of containers to verify that leaks have not occurred since the last inspection.
- Verify that all container identification, dates, and hazardous waste labels are attached and current.
- Inspect container placement and stacking such as aisle space, height, and stability of stacks.
- Examine containment areas to detect signs of deterioration and failure of the containment system such as cracks, breakage, settlement, and spillage.

Corrective Action

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

EMERGENCY NOTIFICATION

Emergency Coordinator

The Branch Manager or designee is the emergency coordinator. Page iii at the beginning of the plan includes the names, home addresses, and both office and home phone numbers of the primary emergency coordinator and alternate. At least one employee will be either present on the facility premises or on call with responsibility for coordinating all emergency response measures at all times. This primary emergency coordinator and alternate emergency coordinator are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out the contingency plan.

EMERGENCY RESPONSE AGENCIES AND TEAM MEMBERS

The agencies and response team members to be notified whenever an imminent or actual emergency occurs are presented on page iii, located at the beginning of this plan.

ACTIONS OF THE EMERGENCY COORDINATOR

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or the designee when the emergency coordinator is on call) must immediately:

- a. Notify all facility personnel present of the emergency. The relatively small size of this facility makes direct verbal communication the most expedient form of emergency notification. The emergency coordinator may also elect to proceed to the front of the building and repeatedly sound a car horn to notify building occupants of an emergency. A head count will be performed by the emergency coordinator.
- b. Notify appropriate state or local agencies with designated response roles if their help is needed.
- c. Summon the primary emergency coordinator, if that person is absent.

Whenever a release, fire, or explosion occurs, the emergency coordinator must immediately identify the character, exact source, amount, and areal extent of any released materials. Because of the limited types of chemicals in storage, the identification processes can easily be performed visually.

Procedure for Assessing Possible Hazard to the Environment and Human Health

- After identification of the character, source, amount, and extent of a release, fire, or explosion, the emergency coordinator must decide whether the situation can be contained or cleaned up by plant personnel and equipment.

- If a fire or explosion is determined uncontrollable by plant personnel or threatening neighboring establishments or population, assistance from a local emergency response agency shall be summoned immediately and an evacuation order requested.
- In case of a release outside of the containment area that is deemed immediately uncontrollable or unrecoverable, the local emergency response agency and/or specialty cleanup contractor shall be called in.
- After termination of a fire or explosion or containment and preliminary cleanup of a spill, evaluate whether residues in the form of gas or liquid have become airborne, seeped into ground water, and/or flowed into surface water bodies.
- Expert assistance should be requested to determine whether the escaped materials are potentially harmful and whether the receiving medium ultimately will be a populated area, public water supply source, a private well, or an environmentally sensitive area.
- Additional steps shall then be taken to mitigate the potential impact on the environment and human health, in accordance with expert recommendations.

If the emergency coordinator determines that the facility has had a release, fire, or explosion or other emergency that could threaten human health, or the environment outside the facility, the coordinator must report those findings, as follows:

- If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities. The coordinator must be available to help appropriate officials decide whether local areas should be evacuated.
- The coordinator must immediately notify the State Warning Point at (850) 413-9911 (24 hours-7 days a week availability).
- The coordinator must immediately notify the Central District of the FDEP, (407) 897-4100 during regular business hours, and if a release equals or exceeds the Reportable Quantity (RQ) the National Response Center (800) 424-8802 must immediately (within 15 minutes) be contacted.

The report must include:

- (1) Name and telephone number of notifier;
- (2) Name and address of facility;
- (3) Time and type of incident (e.g., release, fire);
- (4) Name and quantity of material(s) involved, to the extent known;
- (5) The extent of injuries, if any; and
- (6) The possible hazards to human health, or the environment outside the facility.

Immediate assistance in assessing and responding to an emergency is obtained by the emergency coordinator by calling the 24-hour Safety-Kleen emergency number ((800) 468-1760). The 24 hour emergency number is used by Safety-Kleen to respond to all reports of spills or chemical emergencies. All Safety-Kleen facilities in the state use this 24-hour emergency number. This allows Safety-Kleen to respond to any emergency with a maximum of effort, thereby reducing the threat to human health or the environment.

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated or stored until cleanup procedures are completed; and
- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

The owner or operator must notify the appropriate state and local authorities that the facility is in compliance with the requirements of the preceding paragraph, before operations are resumed in the affected area(s) of the facility.

The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the owner

must submit a written report on the incident to the Central District of the FDEP, at 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803. The report must include:

1. Name, address, and telephone number of the owner or operator;
2. Name, address, and telephone number of the facility;
3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

POTENTIAL SPILL SOURCES

The following is a list of activities that have the potential for a small scale (less than 55 gallons of waste) pollution incident.

1. Moving of containers.
Every time a container is moved, the possibility exists that it could tip over or be dropped. To minimize the possibility of spillage of solvent under those conditions, all container lids must be secured before the container is moved.

2. Delivery truck container transfers.
 - a. Individual delivery containers hold from 5 to 55 gallons of waste, a quantity which can be contained by oil sorbent clay or pads, if accidentally spilled.
 - b. Each vehicle is equipped with a hoist and hand cart for ease of moving clean solvent containers off the truck and into the customer's shop and returning the dirty solvent containers to the truck.
 - c. Lids are secured on containers during movement to prevent a spill.
 - d. Each truck contains a complete spill kit, shovel, and a quantity of sorbent material to contain minor spills.
 - e. The cargo must be secured in the route vehicle before transit.

Spills Inside Buildings

In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. Following the instructions of the Material Safety Data Sheet (MSDS), a worker would enter the area wearing rubber gloves, boots, and mop up the liquid and return it to dirty storage. Spills inside the building will be contained by the existing secondary containment structures, or by using available absorbent material and booms. Proper characterization, treatment, and disposal of the decontamination water will be done on a case by case basis depending on the material released. All material will be disposed of per federal, state, and local regulations. The cleanup is completed only when the workers have cleaned themselves and the emergency equipment with soap and water.

Spills on Concrete Pads

Concrete pads in loading and unloading areas are, in most cases, equipped with secondary containment. Under most spill conditions, product can be totally contained on the concrete surface and in the containment system. Upon containment, arrangements must be immediately undertaken to recover the material. Any soil that may be involved must be removed and handled in the same manner as the material spilled.

Tank Spills or Leakage

Aboveground tanks are underlain by a concrete slab and surrounded by a concrete dike to contain any spilled or leaked solvent. The containment system has been sized in accordance with the regulations, and the material will be totally contained under most spill conditions. Should a spill occur, arrangements must be immediately undertaken to recover the material. In the event of leakage, tank repair or replacement will be initiated. Any soil that may be involved must be removed and handled in the same manner as the material spilled.

40 CFR Part 264.196(d)(2) exempts spills equal to or less than one pound.

Spill Control Procedures

If a solid or hazardous waste, or hazardous material discharge occurs:

1. Stop the discharge, if possible, by immediately transferring the liquid to a good container.
2. Retain, contain, or slow the flow of the material, if possible, by diking with sorbent pad or dirt. Based on the seriousness of the incident, the emergency coordinator will select the level of personal protective equipment required to address the incident. Pump and mop up the liquid from the floor into a good container and return the container to storage for subsequent shipment to a Safety-Kleen recycle center for reclamation/disposal. The area and equipment that comes in contact with the spill must be decontaminated with soap and water. All residues resulting from containment and decontamination will be collected for proper characterization.
3. If the material escapes the containment efforts, immediately call the 24-hour Safety-Kleen emergency number with response time less than two hours (page iii). Record the date, time, and name of person taking the message. The State Warning Point ((850) 413-9911) is to be contacted as soon as possible, but no later than within one working day of discovery of the release. If a release equals or exceeds the Reportable Quantity (RQ) the National Response Center ((800) 424-8802) is to be contacted within 15 minutes.

4. Immediately recover spilled solvent to reduce property and environmental damage using the emergency and safety equipment stored onsite for such situations (Figure 5.6-1 and Table 5.6-1), or call in emergency response contractors (page iii). Start recovery operations immediately.

After recovery of spilled solvent, wash all contaminated impervious surfaces and equipment with soap and water. The residue of spill- or fire-contaminated soils and waste waters must be removed and disposed of at a Safety-Kleen recycle center. In addition, the recovered solvent will be sent to a Safety-Kleen recycle center for reclamation.

5. The person reporting a spill should be prepared to give their name, position, company name, address, and telephone number. The person reporting also should give the nature of the material spilled (e.g., immersion cleaner, etc.) and, if possible, some estimate of the amount, and whether it is near a stream or could enter a stream by flowing through ditches or storm sewers.

If assistance is needed, the emergency coordinator should describe the containment status and specify any additional equipment needed. When reporting a spill, record the date and time of the call and the name of the person answering the call at the above number.

Spill prevention plans are reviewed with facility personnel every year, and records of the training are kept at the facility.

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Information on every spill will be recorded through an internal database. A notification of each spill will be sent to the Corporate Environment Health and Safety Department.

Reports of emergency incidents will be transmitted to the Secretary of the FDEP or designee within 15 days of occurrence. This report shall include:

1. Name, address, and telephone number of the owner of operator;
2. Name, address, and telephone number of the facility;
3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of materials involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

The facility will complete all permit condition spill reporting as required, and follow the requirements of Chapter 62-150, F.A.C. Hazardous Substance Release Notification.

Containment Systems

Containerized Wastes

The hazardous waste container storage area consists of three areas: the container storage area (CSA) located in the warehouse, the transfer waste storage area located in the warehouse, and the

transfer waste storage area located in the Return/Fill station. These areas are shown in Figures 5.6-3 and 5.6-4. The containment system is free of cracks. Containers are stored on pallets whenever possible.

The container storage area shown in Figure 5.6-3 occupies a portion of the main building. This warehouse area has concrete floors, and a central collection trench to form a spill containment system within the area. The permitted container storage area has a 47' 7" X 78' 6" concrete floor that has a 2" slope towards one containment trench. The containment system was measured to have a capacity of 2,077 gallons. The maximum storage capacity in this area is 20,770 gallons- with 6,912 gallons being hazardous waste and the balance being various products. Waste allowed for storage is paint wastes, immersion cleaner, dry cleaning solvent, parts washer solvent dumpster mud, tank bottoms, and oil filters. The types and number of each type of container may vary; however, the storage capacity will not be exceeded.

In the container storage area, containers are handled with a fork-lift and/or a hand-truck free of sharp points and stacked by hand. Every time a container is moved, the possibility exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, container lids are secured and containers are kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into a safe container. Each route truck is equipped with a lift gate or an electric hoist. The appropriate device is used in the loading/unloading operation to minimize chances for spillage and/or employee injury. Containerized wastes at the Sanford facility are loaded/unloaded in the vicinity of the contained concrete dock on the northwestern side of the building (Figure 5.1 2) and return/fill dock. Because these areas are fully enclosed, spills originating in these areas should not come in contact with stormwater.

FRS Wastes and Transfer Wastes

Transfer wastes may be stored in the southern portion of the CSA and in the northwestern bay of the Return/Fill dock. The containment system in the warehouse is free of cracks and is sufficiently impervious to prevent seepage into and through the concrete. Since FRS wastes are transfer only, they are not required to have containment. Because these areas are fully enclosed

within the building, spills originating in these areas should not come into contact with stormwater.

All containers are covered during movement and are located within diked, concrete floored areas to contain any potential spill. The small quantities of waste onsite at any time can be cleaned up immediately through the use of hand-held electric pumps, mops, wet/dry vacuums, or sorbent materials, should a spill occur. Any spilled waste is contained for offsite recycling/reclamation. All containerized waste movement is performed manually, by a pallet jack, or propane fueled forklift truck. Therefore, power outages are not expected to threaten employee safety.

Return/Fill Station

The return/fill station is located between the office and container storage area. A slight, slope (2-3 inches) exists, which terminates at the sumps (2' diameter, 2' deep). The sloped floors and containment sump were measured to have a containment capacity of 3,745 gallons, which equates to a storage capacity of 37,450 gallons. A 20 ft. wide steel grate dock (approximately 33 inches above the floor) is located perpendicular to the floor and extends the full width of this area (Figure 5.6-4). Any spill which occurs on the concrete floor is directed by gravity into the sumps. Any residual remaining on the floor can be cleaned up immediately through the use of mops, wet/dry vacuums, or sorbent materials, should a spill occur. Spilled waste is contained and sent for recycling/reclamation.

Doors in this area include four overhead roll-up doorways for trucks entering/exiting the service building, two personnel doorway for employees entering/exiting the service building, one overhead doorway connecting the return/fill station and container storage area (warehouse), one doorway connecting the return/fill station and the container storage area (warehouse), and one doorway connecting the return/fill station and the offices. The office floor and the container storage floor are approximately 33 inches above the return/fill station floor and are flush with the steel grate dock. Therefore, spills originating in the return/fill station will go into the sumps beneath the grate in the return/fill area and will not flow into these areas. Based on the capacity of the return/fill station collection sumps and sloped floor, it is extremely unlikely that a spill

would escape through the overhead doorways or two doorways entering/exiting the service building. The area just outside the service building return/fill station is asphalt covered. Because the return/fill station is fully enclosed and the pavement outside this area is sloped to carry water away from the building, spills originating in this area should not come in contact with stormwater.

Tank Area

The tank area (Figure 5.6-5) houses four 20,000-gallon tanks and is provided with more than 28,000 gallons of secondary containment, which is in excess of the single largest tank (20,000 gallons). This containment area is only slightly sloped. Any spilled material is removed by pump or wet vacuum. When rainwater accumulates in the containment area, and it has been verified that no spill has occurred, then the rainwater will be discharged to the ground surface. Verification is done by visual inspections of the tank area. As stated above, the tank farm holds 4-20,000 gallon tanks (2-used oil, 1-used solvent, 1-clean solvent), so contamination (by spill or release) of any rainwater that has accumulated in the secondary containment will be easily identified visually. Only the Branch Manager or someone operating under his/her direct orders may discharge to the ground surface. If it is not possible to verify that a spill has not occurred or the water exhibits an iridescent sheen, then the rainwater will be pumped into the used parts washer solvent tank. Any spills which occur on the pad will be cleaned up and the area decontaminated. Decontamination methods are discussed later in this Plan. This decontamination will result in de minimis residue.

Employee training emphasizes the importance of inspection, maintenance, personal safety, and reporting of conditions with pollution incident potential. This training, coupled with the Safety-Kleen's containment system and immediate cleanup of any spills, eliminates or greatly minimizes the chance of contamination of ground water and/or surface water in the vicinity of the site. In addition, surface run-off at the site does not come in contact with stored products in the waste management area.

DECONTAMINATION

Once the spilled material has been cleaned up, the spill area and equipment used during the spill clean-up must be decontaminated and/or disposed, as described below.

Concrete Surfaces/Containment Area

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

Equipment

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

Wash Water and Rinsate

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

EMERGENCY RESPONSE EQUIPMENT AND COMMUNICATION

Due to the small size of the facility, routine communication will be accomplished by voice communication. Fire alarms are available in the office, warehouse, and return/fill station – monitored by a 3rd party that will immediately contact the local fire department if the alarms are activated. Emergency alarms are available at the return/fill station and CSA – these alarms can be activated manually and sounds in the office, and local fire department to indicate an emergency situation. High level alarms are available at the tank farm. Telephones are used in case of a spill or fire emergency to summon assistance. Emergency numbers are posted by phones throughout the facility. Included with these phone numbers is the 24-hour Safety-Kleen spill number. Figure 5.6-1 provides the locations of fire extinguishers, first-aid kits, emergency eyewashes, alarms, and spill equipment. Other emergency response equipment (Table 5.6-1) is kept in a small storage area inside the warehouse. This equipment includes mops and buckets, soap, shovels, and spill sorbent pads. Rubber gloves, boots, pumps, and a wet/dry vacuum cleaner are stored in an emergency supply area near the container storage area. Descriptions and uses of the equipment are provided in Table 5.8-1. Adequate aisle space is provided in the container storage area for movement in an emergency situation. The City of Sanford supplies water for domestic use, decontamination, and fire fighting. The water pressure supplied by the City of Sanford was inadequate for fire fighting purposes, so a booster pump has been installed at the facility. The fire protection system was installed and certified by the installation contractor in accordance with applicable fire codes.

Pails, hoses, and detergents are the primary equipment that will be used for decontamination. The equipment available at the facility for emergency situations is adequate for most cases. Large or serious emergency situations will be remediated by local emergency response teams or special emergency response or cleanup contractors. The facility is constructed and operates in accordance with National Fire Protection Association (NFPA) standards and applicable local ordinances. Applicable health and safety standards are also observed at the facility.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment will be tested and maintained as necessary to assure its proper operation in time of emergency.

FIRE CONTROL PROCEDURES

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

Call the Fire Department (page iii). [Note: Center aisles are available in container storage areas to permit fire department personnel to pass with fire fighting equipment.]

Act quickly with the fire extinguisher to put out the fire before it spreads.

Call the Police Department (page iii) to maintain traffic and on-lookers and local hospital (page iii) to notify the type and extent of injuries, if any.

Ignitable Wastes

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

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

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 solvents 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. The tanks are painted white to reflect sunlight and are vented to prevent 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 mercury) and it and the paint waste may react with strong oxidizers and reactive metals only. Toxic mists, fumes, and dusts do not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization is minimal under normal working conditions.

[Note: Drycleaning wastes are initially not flammable, but may produce toxic gases and hydrochloric acid at elevated temperatures (about 1,200°F).]

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 do not cause deterioration of the tank, drums, or other structural components of the facility.

Incompatible Wastes

Incompatible wastes are segregated in an appropriate manner in accordance with industry standards. All waste or products are kept away from ignition sources. Employees must confine smoking or open flames to designated safe areas.

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.

External Factors

The design of the facility 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. Also, the container storage areas are in buildings which are 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 a previous section of this 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 waste management facility elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.
5. Storms or Cold Weather - The solvent return/fill station, tank storage, and the container storage areas are roofed to eliminate the possibility of rain entering the waste management areas. Neither snow, cold weather, nor stormwater is expected to affect the facility.
6. Hurricanes – Safety-Kleen will adhere to the following procedures in the event of an approaching hurricane:

Hurricane Watch

- Compile list of employees with telephone numbers. Give each a call-in number for the branch (Branch Manager cell phone or branch number) in the event operations are interrupted.
- Prepare battery-operated radio (if the facility has one) and other equipment in the case of power outage.
- Complete cleanup of facility property – all empty drums, containers, trash containers, chairs, spill kits, etc. should be brought inside the facility structure.
- Facility services should be restricted to local routes (no more than 30-45 minutes from the facility) in case weather conditions deteriorate.
- Ensure any areas which may be exposed to rainwater are clean and secure filling nozzles.
- Route trucks should be re-fueled prior to the storm, emptied of all wastes and product, secure lift gates and side compartments.
- Ensure all bulk collection trucks have off-loaded into the facility storage tank or BIDS terminal.
- Move trucks inside building as possible and park the remaining trucks as close to the building as possible (preferably at the bay doors).
- Secure computers, monitors, etc. and wrap in plastic with tape.

- If possible schedule solvent tanker in a manner, which would allow the maximum volume of liquid to remain in the storage tanks as the structural integrity of a tank increases with content volume. Camlock all ends of hose fittings and turn off valves at the storage tanks.
- After all preparation has concluded, all employees should be sent home and the facility secured. Turn off main breaker.

Hurricane Warning

- All employees are excused from work if their county of residence is put under a hurricane warning. However, the branch manager or other key personnel may be available to perform some last minute activities if weather permits.
- Notification, via incident alert system or telephone, that a hurricane warning has been posted.
- Walk-around of facility to ensure all preparation work conducted under the hurricane watch has been completed.
- Completion of any remaining items that were not finished.

Following Hurricane

- Depending on the intensity of the storm, the following actions should be carried out as soon as conditions permit.
- Employees should phone-in, following local government employee guidelines, for returning to work.
- Branch manager and/or the emergency coordinator should be the first people to enter the facility. Perform a complete walk-around of the facility checking for security of premises, waste management areas, determine if there are any safety issues that pose risk for employees, inspect for any damage, looting, or theft and generate a list of items to report.

EVACUATION PLAN

In an uncontrolled emergency, all persons are to be evacuated from the area by means of a verbal cry or use of the public address system and are to assemble across the street from the entrance drive to the facility to assure that all personnel are accounted for and out of the area. The emergency coordinator may elect to use a car horn as a means of emergency notification. A head count will be performed by the emergency coordinator.

The Fire Department must be notified at the time of evacuation either from a safe onsite building or neighboring facilities. Clearly marked exits exist in warehouse and office area.

AVAILABILITY AND REVISION OF THE PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

This Plan and all revisions to the Plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed under the Preparedness and Prevention Plan, which may be called upon to provide emergency services. This Plan and all revisions to the Plan are made readily available to employees working at the facility.

This Plan is reviewed and updated, if necessary, whenever:

1. The facility permit is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
2. The list or location of emergency equipment changes;
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that:
 - a. Materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or
 - b. Changes in response necessary in an emergency.
4. The names, addresses, or phone numbers of emergency coordinators change;
5. The employee assigned to each emergency task changes, or
6. The plan fails when implemented in an emergency.

ARRANGEMENTS WITH LOCAL AUTHORITIES

Arrangements have been made to familiarize the Police Department, Fire Department, and local emergency response teams with the layout of the facility, properties of hazardous materials handled (Material Safety Data Sheets) at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes. The local fire department also conducts annual fire inspections to ensure we are in compliance, and this also gives the Department an opportunity to familiarize themselves with the layout of the facility in person.

Arrangements have been made to familiarize the local hospital with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which would result from fires, explosions, or releases at the facility.

Appendix A of this Plan (located at the end of this section) includes copies of example distribution letters for transmittal. Copies of updated transmittal letters are kept on file at the facility.

Appendix A

Example Letters to Local Authorities

(Date)

Certified Mail #

Sanford Fire Department
1303 South Lake Avenue
Sanford, FL 32771

RE: Safety-Kleen Systems, Inc., 600 Central Park Drive, Sanford, FL 32771

Dear Sir/Madam:

Under terms of the Environmental Protection Agency (EPA) regulations 40 CFR 264, Subpart D, Safety-Kleen Systems, Inc. (SK) must provide local police, fire departments, hospitals, and state or local emergency response teams with a copy of the contingency plan for the above-referenced facility, and any revisions to the plan. A copy of the updated contingency plan is enclosed for your files. Please review this updated contingency plan.

EPA regulations 40 CFR 264, Subpart C, require that SK attempt to make arrangements for the provision of emergency assistance. Emergency assistance for this facility may be needed from the police and fire departments, state emergency response teams, and hospitals. The completion and return of the enclosed form will acknowledge receipt of this update to the contingency plan and provides your agreement to be available for emergency assistance.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit our facility, please contact me at (407) 321-6080.

Sincerely,

Branch Manager
Safety-Kleen -- Sanford

Enclosures

(Date)

Sanford Fire Department
1303 South Lake Avenue
Sanford, FL 32771

Branch Manager
Safety-Kleen Systems, Inc.
600 Central Park Drive
Sanford, FL 32771

RE: Safety-Kleen Systems, Inc., 600 Central Park Drive, Sanford, FL 32771

Dear Branch Manager:

This is to acknowledge that the Sanford Fire Department has been made aware of the potential need for emergency assistance associated with the operation of the Safety-Kleen Systems, Inc. (SK) facility at 600 Central Park Drive, Sanford, FL. The Sanford Fire Department understands that the emergency coordinator is available to provide additional information on the nature of assistance that may potentially be required, type of physical and chemical hazards that may potentially be encountered, and the type of injury or illness that may potentially occur.

This is to acknowledge receipt of the updated contingency plan information for the Sanford, Florida facility.

The Sanford Fire Department _____ (agrees/declines) to be available to provide emergency assistance for the Safety-Kleen Systems, Inc. facility at 600 Central Park Drive, Sanford, FL 32771.

Sincerely,

(Signature)

(Title)

_____ Check here if you do not have a copy of the contingency plan for this SK facility.

(Date)

Certified Mail #

Sanford Police Department
815 Historic Goldsboro Blvd.
Sanford, FL 32771

RE: Safety-Kleen Systems, Inc., 600 Central Park Drive, Sanford, FL 32771

Dear Sir/Madam:

Under terms of Environmental Protection Agency (EPA) regulations 40 CFR 264, Subpart D, Safety-Kleen Systems, Inc. (SK) must provide local police, fire departments, hospitals, and state or local emergency response teams with a copy of the contingency plan for the above-referenced facility, and any revisions to the plan. A copy of the updated contingency plan is enclosed for your files. Please review this updated contingency plan.

EPA regulations 40 CFR 264, Subpart C, require that SK attempt to make arrangements for the provision of emergency assistance. Emergency assistance for this facility may be needed from the police and fire departments, state emergency response teams, and hospitals. The completion and return of the enclosed form will acknowledge receipt of this update to the contingency plan and provides your agreement to be available for emergency assistance.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit our facility, please contact me at (407) 321-6080.

Sincerely,

Branch Manager
Safety-Kleen – Sanford

Enclosures

(Date)

Sanford Police Department
815 Historic Goldsboro Blvd.
Sanford, FL 32771

Branch Manager
Safety-Kleen Systems, Inc.
600 Central Park Drive
Sanford, FL 32771

RE: Safety-Kleen Systems, Inc., 600 Central Park Drive, Sanford, FL 32771

Dear Branch Manager:

This is to acknowledge that the Sanford Police Department has been made aware of the potential need for emergency assistance associated with the operation of the Safety-Kleen Systems, Inc. (SK) facility at 600 Central Park Drive, Sanford, FL. The Sanford Police Department understands that the emergency coordinator is available to provide additional information on the nature of assistance that may potentially be required, type of physical and chemical hazards that may potentially be encountered, and the type of injury or illness that may potentially occur.

This is to acknowledge receipt of the updated contingency plan information for the Sanford, Florida facility.

The Sanford Police Department _____ (agrees/declines) to be available to provide emergency assistance for the Safety-Kleen Systems, Inc. facility at 600 Central Park Drive, Sanford, FL 32771.

Sincerely,

(Signature)

(Title)

_____ Check here if you do not have a copy of the contingency plan for this SK facility.

(Date)

Certified Mail #

Hospital Administrator
Central Florida Regional Hospital
1401 West Seminole Blvd.
Sanford, FL 32771

RE: Safety-Kleen Systems, Inc., 600 Central Park Drive, Sanford, FL 32771

Dear Sir/Madam:

Under terms of Environmental Protection Agency (EPA) regulations 40 CFR 264, Subpart D, Safety-Kleen Systems, Inc. (SK) must provide local police, fire departments, hospitals, and state or local emergency response teams with a copy of the contingency plan for the above-referenced facility, and any revisions to the plan. A copy of the updated contingency plan is enclosed for your files. Please review this updated contingency plan.

EPA regulations 40 CFR 264, subpart C, require that SK attempt to make arrangements for the provision of emergency assistance. Emergency assistance for this facility may be needed from the police, fire departments, state emergency response teams, and hospitals. The completion and return of the enclosed form will acknowledge receipt of this update to the contingency plan and provides your agreement to be available for emergency assistance.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit our facility, please contact me at (407) 321-6080.

Sincerely,

Branch Manager
Safety-Kleen – Sanford

Enclosures

(Date)

Hospital Administrator
Central Florida Regional Hospital
1401 West Seminole Blvd.
Sanford, FL 32771

Branch Manager
Safety-Kleen Systems, Inc.
600 Central Park Drive
Sanford, FL 32771

RE: Safety-Kleen Systems, Inc., 600 Central Park Drive, Sanford, FL 32771

Dear Branch Manager:

This is to acknowledge that the Hospital Administrator, Central Florida Regional Hospital, has been made aware of the potential need for emergency assistance associated with the operation of the Safety-Kleen Systems, Inc. (SK) facility at 600 Central Park Drive, Sanford, FL. The Hospital Administrator, Central Florida Regional Hospital understands that the emergency coordinator is available to provide additional information on the nature of assistance that may potentially be required, type of physical and chemical hazards that may potentially be encountered, and the type of injury or illness that may potentially occur.

This is to acknowledge receipt of the updated contingency plan information for the Sanford, Florida facility.

The Hospital Administrator, Central Florida Regional Hospital _____
(agrees/declines) to be available to provide emergency assistance for the Safety-Kleen Systems, Inc. facility at 600 Central Park Drive, Sanford, FL 32073.

Sincerely,

(Signature)

(Title)

_____ Check here if you do not have a copy of the contingency plan for this SK facility.

FIGURE 5.1-1
EVACUATION ROUTES
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

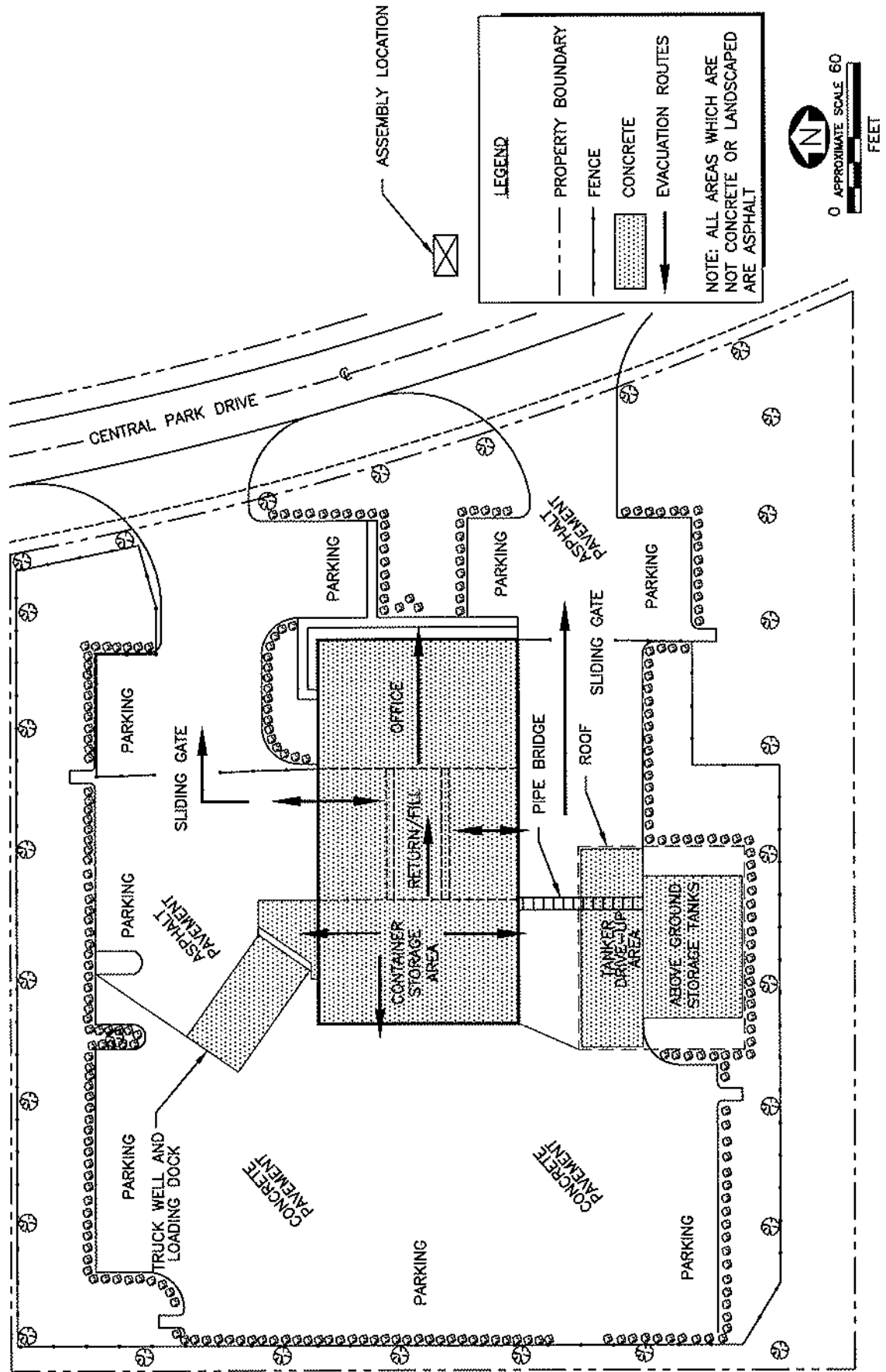


FIGURE 5.1-2
LOCATIONS OF HAZARDOUS WASTE STORAGE AREAS
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

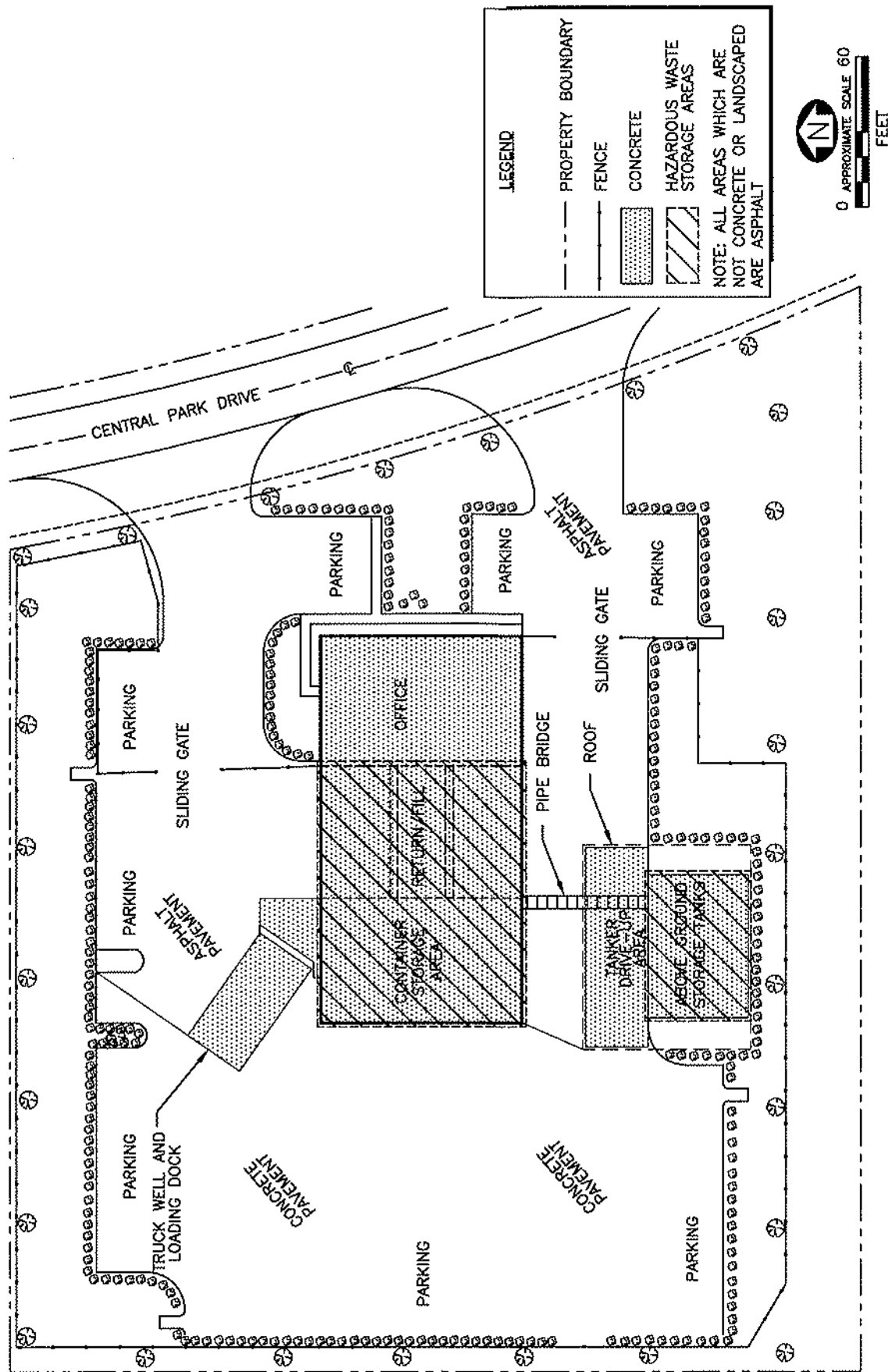


Figure 5.2-1

Safety-Kleen Sanford, Florida – Weekly Inspection of Safety & Emergency Equipment

Inspectors Name/Title:

Monday	Tuesday	Wednesday	Thursday	Friday

DATE (MM/DD/YY)

TIME

SAFETY & EMERGENCY EQUIPMENT

Fire Extinguishers:

A N

If "N" circle appropriate problem: Overdue inspection, inadequately charged, inaccessible, other: _____

Eyewash and Shower:

A N

If "N" circle appropriate problem: disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, other: _____

First Aid Kit:

A N

If "N" circle appropriate problem: inadequate inventory, other: _____

Spill Cleanup Equipment:

A N

If "N" circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, Mops, empty drums, wet/dry vacuum, other: _____

Personal Protective Equipment:

A N

If "N" circle appropriate problem: inadequate supply of aprons, gloves, glasses, respirators, other: _____

Communication Devices:

A N

If "N" circle appropriate problem: inadequate supply of telephones, malfunctioning telephone(s), malfunctioning Intercom, emergency alarm does not work, telephones are not located where needed, other: _____

SECURITY DEVICES

Gates and Locks

A N

If "N" circle appropriate problem: sticking, corrosion, lack or warning signs, fit, other: _____

Fence

A N

If "N" circle appropriate problem: broken ties, corrosion, holes, distortion, other: _____

MISCELLANEOUS EQUIPMENT

Dry Dumpster:

A N

If "N" circle appropriate problem: rust, corrosion, split seams, distorting, deterioration, excess debris, liquids in unit, Other: _____

Observations, comments, date and specific nature of repairs or any items indicated as "NOT ACCEPTABLE"

A = Acceptable N = Not Acceptable: Circle appropriate item for each line above and note specific problem until issue is fixed.

FIGURE 5.6-1
LOCATION OF EMERGENCY EQUIPMENT
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

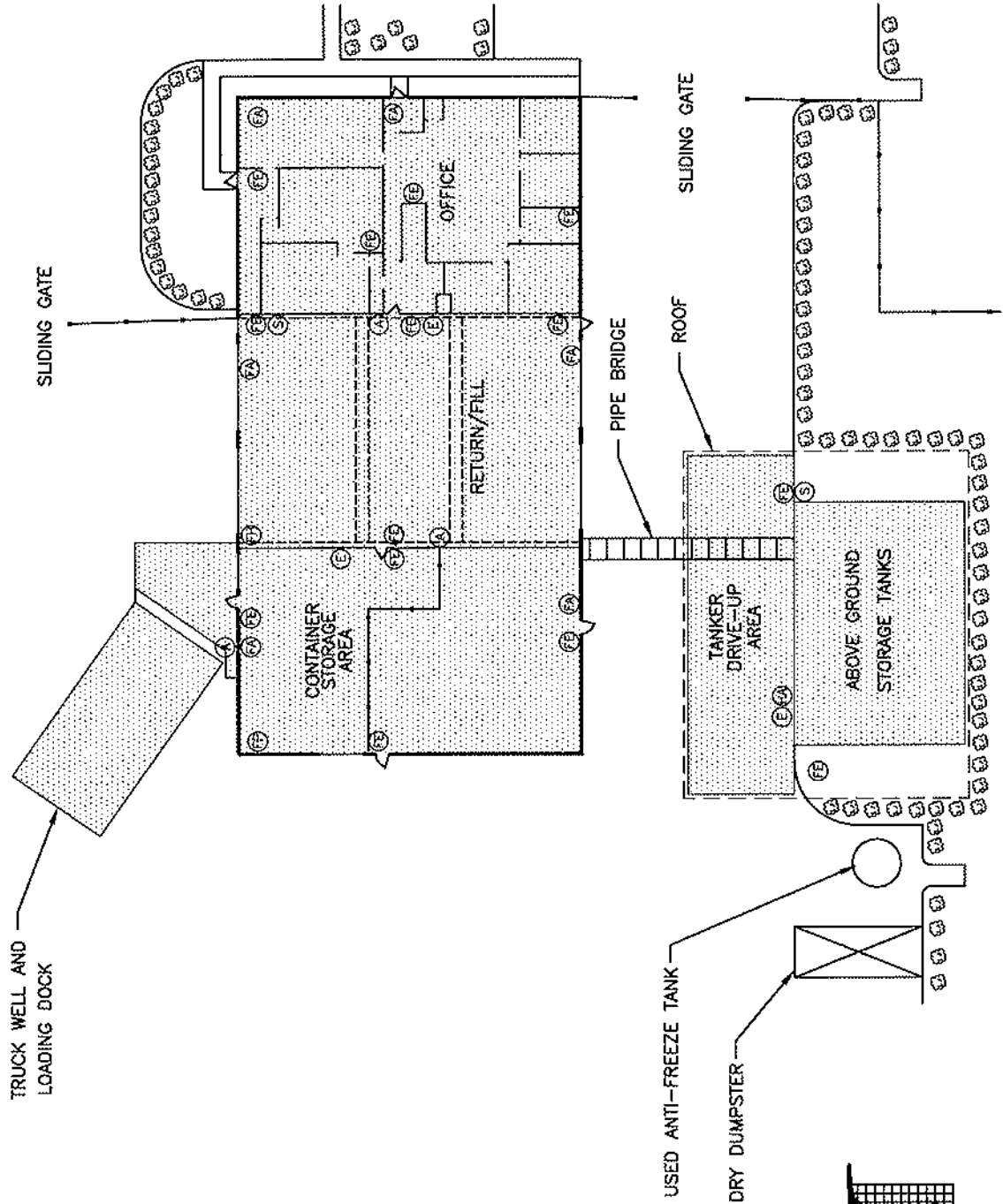


FIGURE 5.6-3
CONTAINER STORAGE AREA
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

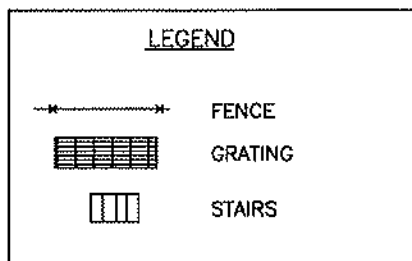
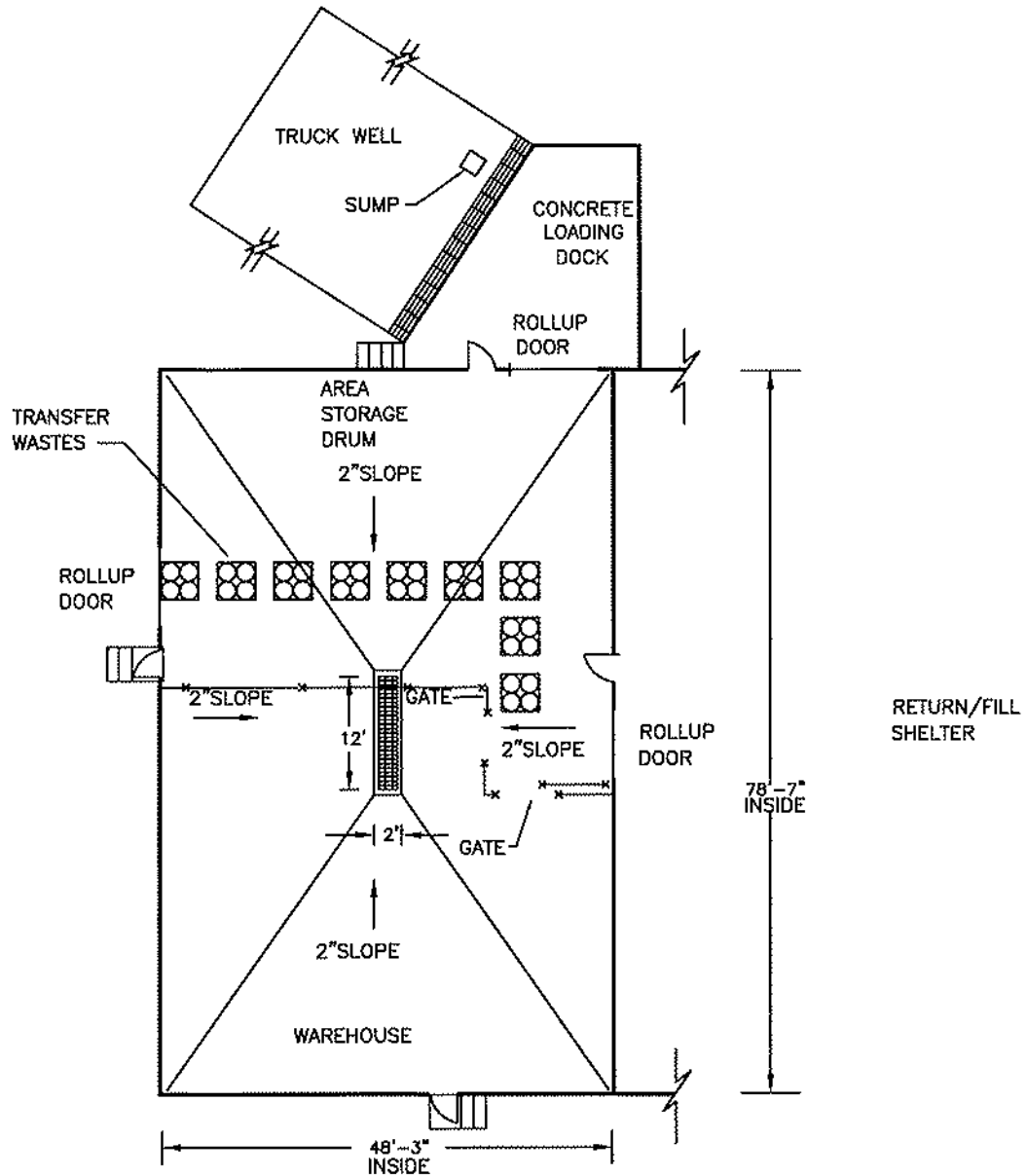
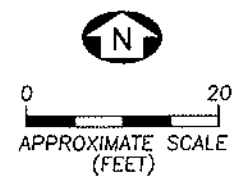
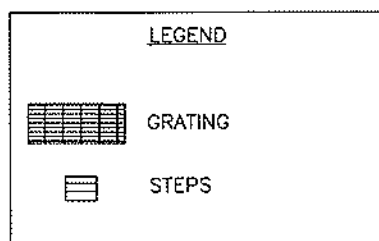
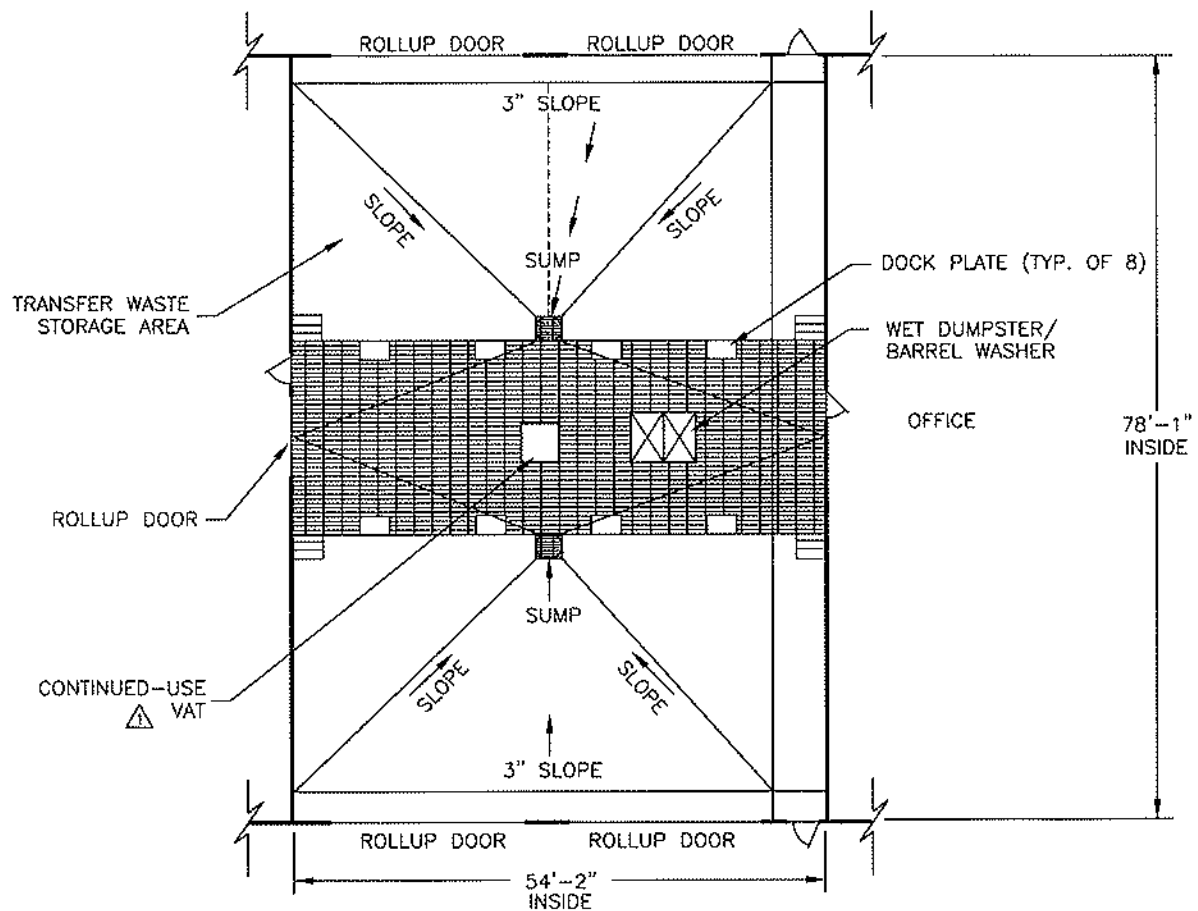
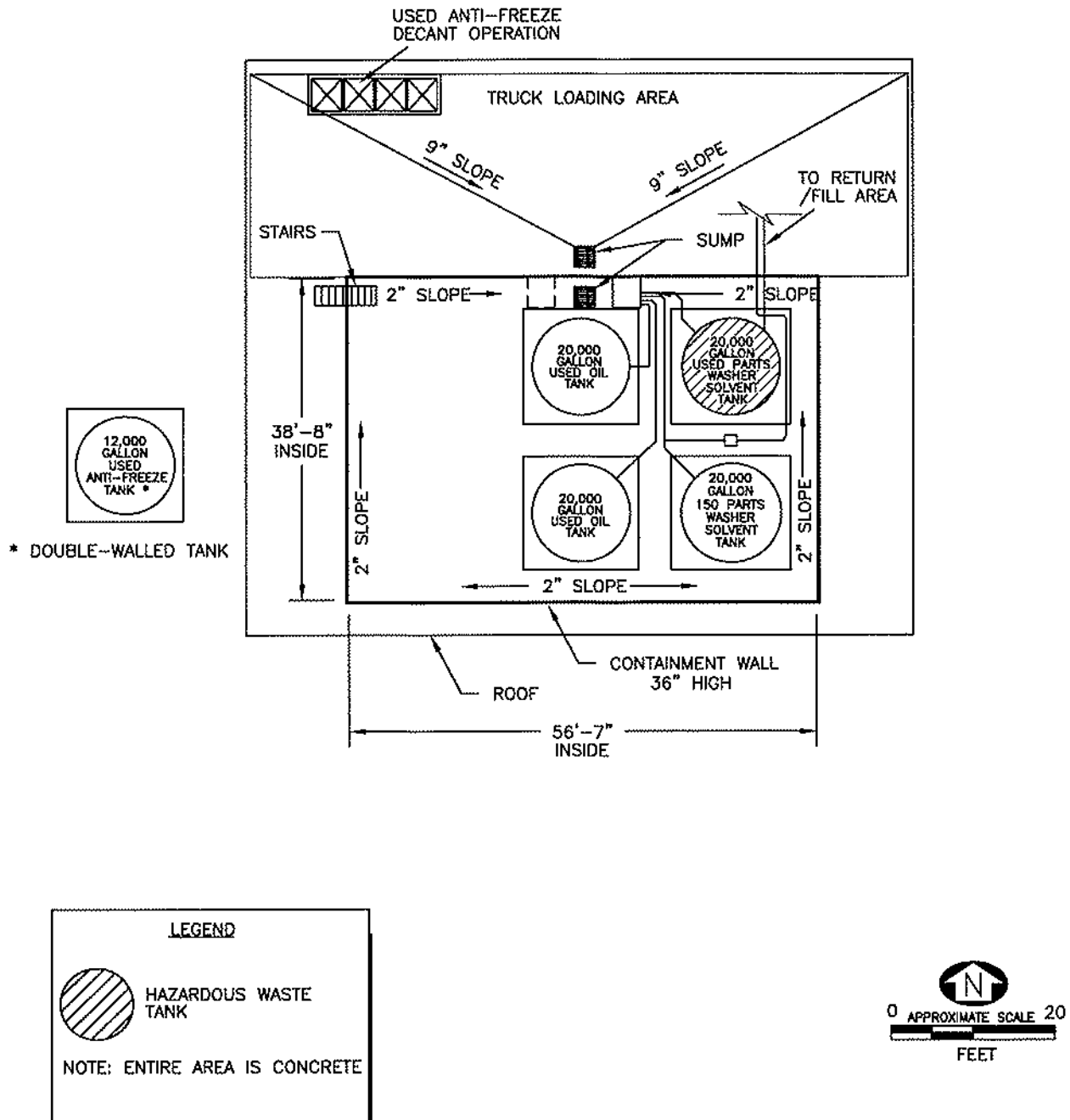


FIGURE 5.6-4
RETURN/FILL SHELTER
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA



ERM.

FIGURE 5.6-5
TANK FARM
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA



**TABLE 5.1-1
PERMITTED AND TRANSFER WASTES**

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent	S01* S02**	374	D001 and D-codes listed in note below
Branch-Generated Liquids/Solids (Debris)	S01*	9	D001 and D-codes listed in note below; F001, F002, F003, F004, F005
Dumpster Sediment	S01*	Included above	D001 and D-codes listed in note below
Tank Bottoms	S01*	Included above	D001 and D-codes listed in note below
Used Immersion cleaner (IC 699)	S01*	6	D-codes listed in note below
Dry Cleaning Waste (Perchloroethylene)	S01*	7	F002 and D-codes listed in note below
Dry Cleaning Waste (Non-perchloroethylene)	S01*	Included above	D-codes listed in note below
Paint Wastes	S01*	18	D001, F003, F005 and D-codes listed in note below
Fluid Recovery Service (FRS)	S01***	100	Transfer wastes-waste codes assigned by generator
Mercury-Containing Lamps/Devices	N/A***	Less than 2.2	N/A-handled as non-hazardous transfer wastes

NOTES:

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

* This waste will be stored in containers in the container storage area. The maximum capacity in the container storage area for hazardous waste is 6,912 gallons.

** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

*** This waste will be held for transfer in containers in the transfer area and designated mercury bulb storage area.

TABLE 5.2-1
INSPECTION SCHEDULE

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Safety Equipment	Fire Extinguishers	Overdue inspection Inadequate charge Inaccessible	Weekly
	Eyewash	Disconnected/malfunctioning valves Pressure Inaccessible	Weekly
	First-Aid Kit	Inadequate inventory	Weekly
	Spill Cleanup Equip PPE	Inadequate supply Inadequate supply	Weekly Weekly
Security Equipment	Gates and Locks	Sticking, corrosion, lack of warning signs	Weekly
	Fence	Broken ties, corrosion, holes	Weekly
Storage Tanks	Volume in Tank	Never more than 95% full	Daily
	Tank Exterior	Rusty, loose anchoring, grounding, wet spots, leaks, discoloration	Daily
	High Level Alarms Volume Gauges	Malfunctioning siren/light Disconnected/ sticking, condensation	Daily Daily
Secondary Containment	Bottom and Walls	Cracks, debris, ponding, wet spots, stains, deterioration, displacement, leaks	Daily
	Rigid Piping and Supports	Distortion, corrosion, paint failures, leaks	Daily
Transfer Pumps and Hoses	Pump Seals	Leaks	Daily
	Motors	Overheating	Daily
	Fittings	Leaks	Daily
	Valves	Leaks, sticking	Daily
	Hose Connections and Fittings	Cracks, loose, leaks	Daily
	Hose Body	Crushed, cracked, thin spots, leaks	Leaks

TABLE 5.2-1
INSPECTION SCHEDULE

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Return/Fill Station	Wet Dumpster	Excess sediment build-up, leaks, rust, split seams, distortion, deterioration, excess debris	Daily
Container Storage Area	Total Volume in Storage Condition of Drums	Exceeds permitted limit Missing or loose lids, labels missing, incomplete or incorrect, rust, leaks, distortion	Daily Daily
	Stacking/Placement/Aisle Space	Containers not on pallets, unstable stacks, inadequate aisle space	Daily
Secondary Containment	Curbing, Floor and Sump	Ponding/wet spots, deterioration, displacement, leaks, other	Daily

TABLE 5.6-1
EMERGENCY RESPONSE EQUIPMENT

Description	Type/Capacity	Location	Quantity
Fire Extinguisher	ABC (10 lb)	Office	4
		Warehouse	4
		Return/Fill	4
		Tank Farm	2
Eyewash	Fountain	Warehouse	1
		Return/Fill Area	1
		Tank Farm	1
First-Aid	OSHA Compliant	Warehouse/Office	2
Telephones	Standard	Office	Min. 6
Telephones	Standard	Warehouse	1
Intercom	Explosion Proof	All Buildings	N/A
Gloves	Rubber	Emergency Equip Area	Min. 3
Boot covers	Rubber	Emergency Equip Area	Min. 3
Protective Clothing	Apron	Emergency Equip Area	Min. 2
Eye Protection	Goggles/Safety Glasses	Emergency Equip Area	Min. 3
Sorbent Material	Oil Absorbing	Emergency Equip Area	Min. 1 bag
Shovel	Standard	Emergency Equip Area	Min. 1
Mop and Bucket	Standard	Emergency Equip Area	Min. 1
Respirator	Air Purifiers	Emergency Equip Area	Min. 2
Pump	Hand-held, Electric	Return/Fill Area	Min. 1
Wet/Dry Vacuum	Portable, Electric	Emergency Equip Area	1
Empty Drums for Overpack	30, 55, 85 gal.	Container Storage Area	4
Fire Alarms	Manual-pull	Office/Warehouse/Return/Fill	5
Emergency Alarm	Manual	Return/Fill Area/Back Dock	3
High Level Alarms	Automatic	Tank Farm	1

TABLE 5.8-1

DESCRIPTION AND USES OF EMERGENCY EQUIPMENT

Item	Location	Use/Description
Gloves	Warehouse cage/Emergency Equipment Area	To be used when handling the solvents and chemical containers.
Safety Glasses or Face Mask	Warehouse cage/Emergency Equipment Area	To be worn when loading or unloading solvent.
Plastic Aprons	Warehouse cage/Emergency Equipment Area	For situations where a solvent may get on the workers clothing.
Eyewash Stand	Container storage area return/fill/area/tank farm	The workers should operate the stand and Become familiar with its operation
Showers	Return/fill/container storage area/tank farm	These are used for emergency exposure situations.
Fire Extinguisher	Office/Return Fill/Warehouse/Tank Farm	An ABC extinguisher is a universal system used on paper, wood, and electrical, as well as solvent fires. The extinguishers must be full and carry an inspection tag.
Absorbent Material	Loading/Unloading Area/Warehouse	An adequate supply will be on hand to handle small spills. A 50 lb bag will also be kept in the warehouse to remediate and prevent spread of large spills
Portable Pumps Wet/Dry Vac	Warehouse	For use in picking up liquid spills in the container containment area, or other paved areas, and transfer materials associated with spills
Recovery Containers	Warehouse	Emergency storage of spilled product, cleaning fluids, or other materials associated with spills
Plastic	Warehouse	Used for containment of decontamination zones
Duct Tape	Warehouse	Taping of protective clothing, plastic, and other uses
First-aid	Office/Warehouse	Minor first-aid needs and health problems
Shovels/Mops	Warehouse	Used to collect spills and residue
Communication Equip	Facility Wide	Phones with intercom systems in office/warehouse for internal and external communications
Decon. Equip.	Warehouse	2 brushes, box of detergent, rags, available for decon of clean up equip.
Fire Alarm	Office/Warehouse/Return Fill	To be pulled in the event of a fire at the facility that requires outside assistance
Emergency Alarm	Return/Fill Station/Back loading dock	To notify personnel in the office of an emergency situation in the back of the facility
High-level Alarm	Tank Farm	Automatic alarm that will sound in the event tanks reach a certain level in order to prevent over-filling

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 information presented in this section is a representative example of employee training at Safety-Kleen. Variations in individual training may occur.

The purpose of Safety-Kleen's training program is to familiarize employees with environmental regulations, records, and emergency procedures so they will perform their activities 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 job assignments. New managers must complete a formal introductory training program before starting their jobs, with annual review and update thereafter. New Sales and Service Representatives and all other hazardous waste employees must undergo a combination of classroom and on-the-job training prior to working with hazardous waste. Personnel involved in direct handling of hazardous waste do not work unsupervised until they have completed the entire initial hazardous waste training course.

Outline of Training Program

An outline of the training program given initially to employees who manage or handle Hazardous at the Branch is presented in Table 6.1-1.

Job Title/Job Description

Job descriptions for employees who would be expected to manage or handle hazardous Wastes are provided in Tables 6.1-2 through 6.1-15.

Training Content, Frequency, and Techniques

Employee training is accomplished using classroom, online, videotape, written, and on-the-job methods. All new employees whose responsibilities require 24-Hour Hazardous Waste Operations and Emergency Response (Hazwoper) training will receive at least five days of instruction at the Safety-Kleen Training Center. This training program provides a consistent and quality hazardous waste operations training program.

The training that a new operations employee will receive is divided into two parts.

- Two weeks of employment will be spent at the Safety-Kleen Training Center. The new employee will receive a company orientation, including a review of company benefits, and hazardous waste operations training.
- The second part of new employee training is site specific training. When the new employee returns to the Branch, qualified individuals delegated by Branch management will complete facility specific training. This will include such things as permit requirements, emergency contingency plan training, location of emergency equipment, etc.

The job tasks a person performs will dictate the type of instruction required. Courses taught at the Safety-Kleen Training Center will include a company and benefit orientation, 24-hour Hazwoper training, Hazardous Materials Transportation Skills (HMTS) training, and Driver Safety training, as well as job specific training.

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

Training of New Branch General Managers: New Branch Managers are trained for several weeks before they begin their new positions. This training is given on-the-job. 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 regulations, and a review of the Part B, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan.

Training of New Customer Service Manager: The Customer Service Manager is responsible for administrative operations at the Branch. Training is on location in the form of periodic training topics. This training includes an introduction to environmental regulations (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 facility. Also, while being trained at the Branch where they will be stationed, a new Customer Service Manager will review environmental records and learn the recordkeeping and inspection requirements. These records include: manifests, personnel records, training records, service center inspection records, and spill reports.

Training of New Secretaries: 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 Branch Manager and is done within six months of starting. This training is often presented in periodic training topics on emergency response, shipping documents (including manifests), drum labels, and other safety and environmental compliance issues.

Training of New Sales and Service Representatives, Market Sales Specialists: These personnel are trained on-the-job for two weeks during which they are introduced to manifests, service center inspection records, and training records. Additional training is in the form of periodic training topics and a review of the Contingency Plan.

Training of New Material Handlers: A Material Handler is trained to maintain the service center and assist the other Branch employees in their tasks. The Material Handler may be a designee to perform Branch inspections and must be trained by the Branch Manager.

Annual Training: On an annual basis, employees are trained using the programs prepared and updated annually by the EHS and Training Departments which contain the topics in Table 6.1-1. This training also includes updates on environmental regulations, review of the Contingency Plan and a review of RCRA inspection criteria. This review is in the form of classroom instruction, videotapes, and a review and discussion of the storage service center permit/application. In addition, periodic sessions on changes in environmental regulations are issued by the EHS Department and must be attended by all 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 Richardson, Texas. 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 employees and conducting Annual Refresher Training.

Qualifications for individual staff members of the EHS Department who conduct training at the Branch 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 their 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 the 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 initial training yearly refresher courses. 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. 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.

Training for Handling Mercury-Containing Lamps and Devices

As a registered transporter and storage facility for mercury-containing lamps and devices destined for recycling, the Branch has certified that employees handling spent lamps or devices are trained in the applicable proper handling and emergency cleanup and containment procedures, and that these emergency procedures will be kept at the Branch for inspection upon request by the FDEP.

Personnel Training Records

All personnel training is documented and the documentation is kept on file at the Branch until closure for active employees, and three years for employees that have terminated their employment with Safety-Kleen. Documentation includes the training received, employee name, and the date of training.

TABLE 6.1-1

OUTLINE OF TRAINING TOPICS

	Topic	Course
Monday	Welcome / Introductions	Orientation
	Overview/History/Products/Locations	Orientation
	Policies/Benefits	Orientation
	Orientation Activity and Quiz	Orientation
	Blood Borne Pathogens	24-Hour Hazwoper
	Regulatory Compliance	24-Hour Hazwoper
	Hazard Recognition	24-Hour Hazwoper
	Hazard Communication/WHMIS	24-Hour Hazwoper
Tuesday	Topic	
	Hazard Communication/WHMIS	24-Hour Hazwoper
	Test 1	24-Hour Hazwoper
	Personal Protective Equipment (PPE)	24-Hour Hazwoper
	Decontamination (Decon)	24-Hour Hazwoper
	PPE/Decon Practical	24-Hour Hazwoper
	Respiratory Protection	24-Hour Hazwoper
	Respiratory Protection Practical	24-Hour Hazwoper
	Toxicology	24-Hour Hazwoper
Wednesday	Topic	
	Toxicology	24-Hour Hazwoper
	Test 2	24-Hour Hazwoper
	Drum Handling	24-Hour Hazwoper
	Container Handling Practical	24-Hour Hazwoper
	Exposure Monitoring	24-Hour Hazwoper
	Medical Surveillance	24-Hour Hazwoper
	Hearing Conservation	24-Hour Hazwoper
	Ergonomics	24-Hour Hazwoper
	Fire Protection	24-Hour Hazwoper
	Confined Space/Lockout-Tagout	24-Hour Hazwoper
	Fall Protection	24-Hour Hazwoper
	Electrical Safety	24-Hour Hazwoper
Thursday	Topic	
	Site Health & Safety Plans	24-Hour Hazwoper
	Test 3	24-Hour Hazwoper
	HMTS Regulations/Trans. Cont. Plan	Hazardous Materials
	Hazard Classes	Transportation Skills
	Shipping Papers	↓
	Labeling & Marking	↓
	Placarding/Segregation	↓
	HMTS Test	HMTS
Friday	Topic	
	DDC Strategies	Driver Skills
	Professional Drivers Characteristics	

Friday		
	Lane Management	Driver Skills
	Driving Conditions	Driver Skills
	Backing/Conclusion/Trans. Cont. Plan	Driver Skills

TABLE 6.1-2

JOB DESCRIPTION BRANCH GENERAL MANAGER

Position Title: Branch General Manager (BGM)

Reporting Relationship: Reports to District Manager

Qualifications:

- College degree or equivalent sales/management experience.
- Must have five (5) years of progressively responsible branch sales and management experience.
- Must possess leadership abilities, and have the capacity to interface effectively with Branch, District, Region, and Marketing personnel.

Position Overview: Overall responsibility for Branch operations including, but not limited to, growth, profit and loss, EHS compliance, asset management, employee oversight...

Essential Job Functions and Responsibilities:

- Profit and Loss
- Customer retention
- Employee turnover
- Environmental, Health & Safety compliance
- Personnel management with HR assistance
- Employee recruiting and training
- Fleet management
- Community relations
- Ethical business practices
- Distribute and manage sales reports
- Monitor sales/service activities

TABLE 6.1-3

JOB DESCRIPTION LEAD SECRETARY

Position Title: Lead Secretary

Reporting Relationship: Reports to Branch General Manager

Qualifications: Must be a high school graduate with good written and verbal communications skills, interpersonal skills and computer knowledge.

Position Overview: Lead Secretary must possess the ability to interact efficiently with Branch General Manager, and Customer Service Manager. Directs all paperwork flow and must exhibit a thorough knowledge of Hazardous Waste regulations with regard to responsibilities as well as all Safety-Kleen policies and procedures. Coordinates administrative staff training on all issues, as well as for facility.

Essential Job Functions and Responsibilities:

- Supervise Branch Secretaries
- Verification of sales and hazardous waste documents
- Ensure proper completion of facility operating log, proper maintenance of accounts receivable, bank deposits, manifests, and other administrative areas
- Assists management in incident response
- Maintain training database
- Coordinate personnel requirements such as DOT physicals, employee physicals, employee start packs, and workers compensation claims, etc.
- Ensures all contractors are signed in to the facility record
- Provides corrections for annual reports
- Maintains customer information – EPA ID numbers, etc.
- Oversees FRS/Lab correspondence
- Participates in hiring and training of Administrative staff
- Maintain branch level Customer Service/Collection procedures
- Perform other duties as assigned by BGM

TABLE 6.1-4

JOB DESCRIPTION BRANCH SECRETARY

Position Title: Branch Secretary

Reporting Relationship: Reports to Lead Secretary

Qualifications: Must be a high school graduate with good written and verbal communication skills, interpersonal skills and computer knowledge.

Position Overview: Branch Secretary must possess the ability to interact with effectively with Lead Secretary, Branch Manager, and Customer Service Manager. Directs paperwork flow and must exhibit a thorough knowledge of Hazardous Waste regulations with regard to responsibilities as well as Safety-Kleen policies and procedures.

Essential Job Functions and Responsibilities:

- Verify sales and hazardous waste documents
- Maintenance of accounts receivable, bank deposits, manifests, and other key administrative areas
- Corrections for annual reports
- Oversees FRS/Lab correspondence
- Maintain Branch level Customer Service/Collection procedures
- Perform other duties as assigned by management

TABLE 6.1-5

JOB DESCRIPTION LEAD MATERIAL HANDLER

Position Title: Lead Material Handler

Reporting Relationship: Reports to Branch General Manager

Qualifications: High school graduate, and the ability to pass CDL and other requirements.

Position Overview: Responsible for operation of Return/Fill, site EHS compliance and general warehouse housekeeping. Monthly inventory, and waste shipments.

Essential Job Functions and Responsibilities:

- Oversee operation of Return/Fill
- Assist in training of Material Handlers
- Act as escort for government inspectors in the absence of Branch General Manager, Customer Service Manager, or Environmental Manager
- Ensure proper maintenance of facility operating log and compliance with site specific regulatory issues
- May act as emergency coordinator and assist management in incident response
- Monitor contractors working on site
- Oversee facility housekeeping schedule
- Other duties as directed by BGM

TABLE 6.1-6

JOB DESCRIPTION MATERIAL HANDLER

Position Title: Material Handler

Reporting Relationship: Reports to Lead Material Handler

Qualifications: High school graduate and ability to pass CDL and other requirements.

Position Overview: Operation of Return/Fill, site EHS compliance and general warehouse housekeeping duties.

Essential Job Functions and Responsibilities:

- Operation of Return/Fill
- Facility housekeeping
- Other duties as directed by Lead Material Handler

TABLE 6.1-7

JOB DESCRIPTION CUSTOMER SERVICE MANAGER

Position Title: Customer Service Manager

Reporting Relationship: Reports to the Branch General Manager

Qualifications:

- College degree or equivalent sales/management experience
- Must have three (3) years of progressively responsible branch sales/service and management experience
- Must possess leadership abilities, and have the capacity to interface effectively with Branch, and District personnel

Position Overview: Ensure optimum customer service leading to retention and expansion of Branch business

Essential Job Functions and Responsibilities:

- Assure Customer satisfaction and retention
- Recruit and train Sales and Service Representatives
- Reduce employee turnover
- Maintain high on time performance
- Preprint and route management
- QA sales and service
- Fleet management
- EHS compliance with all relevant Branch activities

TABLE 6.1-8

JOB DESCRIPTION SALES AND SERVICE ASSOCIATE

Position Title: Sales and Service Associate

Reporting Relationship: Reports to Branch Customer Service Manager

Qualifications:

- High school graduate
- Ability to pass CDL and other requirements
- Ability to interface with customers, and branch personnel

Position Overview: Perform sales and service functions with experienced personnel until ready to assume responsibilities working alone.




Essential Job Functions and Responsibilities:

- Service equipment at customer locations
- Develop strong customer relations
- Maintain high on time performance
- Installation/Recovery of equipment
- Level one equipment repair
- EHS compliance with all relevant activities
- Other duties as assigned by Branch Customer Service Manager

Lead

Burma, FredCompany Name Burma Aut... Business Phone 561-844-1... Lead Source  Hot Tool

General

Company Name	Burma Auto Repair	Lead Source	 <u>Hot Tool - OTHER</u>
First Name	Fred	Account Type	Branch Sales
Last Name	Burma	Location	 <u>BOYNTON BEACH FL (PALM BEACH)</u>
Job Title		Lead Class	
Business Phone	561-844-1888	Status Reason	New
E-mail			
Territory	 <u>Terr-MSS-38-6</u>	Source Campaign	
		Campaign Response	

Customer

Address

Street 1	7150 Devons Rd Bay 10		
Street 2			
City	Riviera Beach	State/Province	FL
ZIP/Postal Code	33404	Country/Region	US



Additional Information

Market Segment	 <u>01</u>	Segment Description	
LOB		LOB Selected	PW;

HOT Tool Comments

Description	Customer has a wash tank (for transmissions) that he would like service on. Currently with Crystal clean but they wanted to put him on a contract he wasn't happy with.
-------------	---

Activities

 Subject	Regarding	Activity Type	Activity Sta
No Activity records are available in this view.			
 0 - 0 of 0 (0 selected)			
Page 1			


Notes

Administration

Owner

 Fischer, Steve

Hot Tool

 Burma Auto Repair - New Lead -
11/5/2013

CLH Sales Rep

Beacon ID

CLH Sales Rep Name

Status

Open

Owner


 Fischer, Steve

TABLE 6.1-9

JOB DESCRIPTION SENIOR SALES AND SERVICE REPRESENTATIVE

Position Title: Senior Sales and Service Representative

Reporting Relationship: Reports to Branch Customer Service Manager

Qualifications:

- High school graduate
- Three (3) years experience as Sales and Service Representative
- Ability to interface with customers and branch personnel

Position Overview: Assist Branch Customer Service Manager to ensure optimum customer service leading to retention and expansion of branch business.

Essential Job Functions and Responsibilities:

- Assist in recruiting, training and managing Sales and Service Reps
- Service equipment at customers locations
- Develop strong customer relations
- Maintain high branch on time performance
- Maintain low branch DSO
- Installation/Recovery of equipment
- Level one equipment repair
- EHS compliance with all relevant activities
- Other duties as assigned by the Branch Customer Service Manager

TABLE 6.1-10

JOB DESCRIPTION SALES AND SERVICE REPRESENTATIVE

Position Title: Sales and Service Representative

Reporting Relationship: Reports to Branch Customer Service Manager

Qualifications:

- High school graduate
- Ability to pass CDL and other requirements

Position Overview: Provide service at a level that meets or exceeds customer expectations while complying with all relevant regulations and Safety-Kleen policies and procedures

Essential Job Functions and Responsibilities:

- Service equipment at customer locations
- Develop strong customer relations
- Maintain high branch on time performance
- Maintain low branch DSO
- Installation/Recovery of equipment
- Level one equipment repair
- EHS compliance with all relevant activities
- Other duties as assigned by the Branch Customer Service Manager

TABLE 6.1-11

JOB DESCRIPTION OIL SALES AND SERVICE REPRESENTATIVE

Position Title: Oil Sales and Service Representative

Reporting Relationship: Reports to Branch Customer Service Manager

Qualifications:

- High school graduate
- Ability to pass CDL and other requirements

Position Overview: Provide service at a level that meets or exceeds customer expectations and comply with all relevant regulations and Safety-Kleen policies and procedures

Essential Job Functions and Responsibilities:

- Develop strong customer relations and solicit new business
- Maintain high branch on time performance
- Maintain low branch DSO
- EHS compliance
- Other duties as assigned by the Branch Customer Service Manager

TABLE 6.1-12

JOB DESCRIPTION VAC SALES AND SERVICE REPRESENTATIVE

Position Title: Vac Sales and Service Representative

Reporting Relationship: Reports to Branch Customer Service Manager

Qualifications:

- High school graduate
- Ability to pass CDL and other requirements

Position Overview: Provide service at a level that meets or exceeds customer expectations and comply with all relevant regulations and Safety-Kleen policies and procedures

Essential Job Functions and Responsibilities:

- Develop strong customer relations and solicit new business
- Maintain high branch on time performance
- Maintain low branch DSO
- EHS compliance
- Other duties as assigned by the Branch Customer Service Manager

TABLE 6.1-13

JOB DESCRIPTION AUTOMOTIVE SALES MANAGER

Position Title: Automotive Sales Manager

Reporting Relationship: Reports to Branch General Manager

Qualifications:

- College degree or equivalent sales/management experience
- Proven sales/management ability
- Self motivated individual
- Excellent communication and presentation skills

Position Overview: Manage sales to existing customers and expanding customer base

Essential Job Functions and Responsibilities:

- Growth/Quota attainment
- Establish goals and monitor sales activity
- Customer retention/Accounts receivable
- Key account management
- Comply with corporate credit policies
- Gather competitive information
- Communicate with Branch Customer Service Manager to ensure high level of customer satisfaction/retention

TABLE 6.1-14

JOB DESCRIPTION MARKET SALES SPECIALIST

Position Title: Market Sales Specialist

Reporting Relationship: Reports to Branch General Manager

Qualifications:

- High school graduate
- Proven sales ability
- Self motivated
- Excellent communication and presentation skills

Position Overview: Grow branch business through direct selling to new and existing customers

Essential Job Functions and Responsibilities:

- Full time direct sales to specific SIC
- Current account expansion
- New account creation
- Account retention/Accounts receivable
- Sample waste streams
- Comply with corporate credit policies

TABLE 6.1-15

CONTINUING TRAINING TOPICS FOR BRANCH EMPLOYEES

- Hazard Communication Safety Training
- Hazard Communication regarding MSDSs
- Preventing Injury and Illness
- Hazardous Materials Regulations
- Waste Analysis Plan
- Preparedness, Prevention, and Contingency Plan
- Respirator Fit Testing, and Training
- Generator Requirements
- Hazardous Waste Paperwork – Manifests, BOL, Labeling, etc.

Part II

A. General

5. WASTE INFORMATION

WASTE ANALYSIS AND WASTE CODES

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

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

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

USED PARTS WASHER SOLVENT

The clean parts washer solvents are labeled under trade names. Flash points of the petroleum-based parts washer solvents range from 148°F (ignitable) to 212°F. Chemically, the solvent primarily consists of petroleum hydrocarbon fractions with boiling points between 310°F and 400°F. Impurities, such as light aromatic hydrocarbons (LAHC) and chlorinated hydrocarbons, usually constitute less than one percent of the total volume.

The used petroleum-based parts washer solvent consists primarily of parts washer solvent, solids, oil, and grease picked up in the various degreasing operations. In most instances, no water is associated with the used solvent; however at times, the water content may range from one percent to as much as 50 percent. The oily bottom solids may range from 2 percent to 10 percent, by volume, in the used solvent mixture. The substances that comprise the used parts washer solvent are compatible and are suitable for bulking.

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

Containers of parts washer solvent that are returned from customers are poured into a drum washer (wet dumpster) at the return/fill station, which is piped into the used solvent 20,000-gallon aboveground storage tank located in the tank farm. Safety-Kleen has converted to 150 Premium Solvent for distribution to our customers for parts washer units and has discontinued the 105 solvent in the State of Florida. The mixture within the 20,000-gallon storage tank, therefore, may not exhibit the characteristic of ignitability, though it is managed as such. The used parts washer solvents also may be considered characteristic waste by toxicity characteristic leaching procedure (TCLP) and may carry the waste codes referred to in Table 7.1-1.

Used Immersion Cleaner

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

The used immersion cleaner #699 is returned from customers in separate containers and remains in these containers for shipment to a Safety-Kleen TSDF. The used

immersion cleaner is basically unchanged from its clean state, except oil, grease, and other solids may be picked up during the various degreasing operations. This spent solvent is not an ignitable waste. It is regarded as characteristic hazardous waste because of the presence of various metals and organic constituents. The waste codes that the used immersion cleaner may carry are listed in Table 7.1-1.

Used Parts Washer Solvent Bottom Sludge

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

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

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

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

bottoms may be considered characteristically hazardous with respect to TCLP and may carry the waste codes referred to in Table 7.1-1.

Dry Cleaning Wastes

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

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

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

Paint Wastes

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

Fluid Recovery Service Wastes

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

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

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

Used Antifreeze

The spent antifreeze (ethylene glycol) is collected from automobile service stations. All antifreeze collected and managed by Safety-Kleen within Florida is recycled. At the customer's location, Safety-Kleen pumps waste ethylene glycol (antifreeze) into a Safety-Kleen used oil tanker truck. The trucks have more than one compartment so the antifreeze is picked up and stored in a separate compartment until off-load at the branch. This truck transports the used antifreeze (glycol) to the branch for off-loading into a tank for storage. The material is stored on-site until being sent to a recycler for processing into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's *the Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. In addition, Safety-Kleen sells its' own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is shipped to SK distribution centers, and then shipped to 3rd party recyclers.

Aqueous Brake Cleaner

The Aqueous Brake Cleaner (ABC) is primarily an aqueous solution with approximately 10% nonorganic additives and detergents. The spent ABC is transported from the customers in containers. Spent ABC from customer's parts washers is managed as a 10-day transfer waste and is stored in the transfer waste storage area. The used aqueous parts washer solvent may or may not be considered characteristic waste by TCLP and may carry the waste codes referred to in Table 7.1-1.

Aqueous Parts Washer Solvent

The aqueous parts washer solvent is primarily an aqueous solution with a small amount of organic additives (alcohols). The spent aqueous parts washer solvent is transported to customers in containers and will be accumulated in the 15,000-gallon used solvent storage tank via the return/fill station. The used aqueous parts washer solvent may, or

may not be considered characteristic waste by TCLP and may carry the waste codes referred to in Table 7.1-1.

Mercury-Containing Lamps and Devices & Batteries

Mercury-containing lamps and devices are another type of waste handled by the Branch. These wastes are handled as non-regulated transfer wastes, and as such carry no waste codes. As part of its protocol for handling mercury-containing lamps and devices, the Branch provides customers with four-foot and eight-foot boxes which hold up to 39 lamps. The boxes are picked up at customer locations and are stored at the Branch in a designated area within the transfer waste storage area (Figure 8-1). These containers are labeled in accordance with 62-737.400(5)(b), Florida Administrative Code (FAC). The boxes are periodically shipped to a permitted mercury recovery or reclamation facility.

Safety-Kleen handles all types of batteries with the exception of lithium batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting those standards may be managed as 10-day transfer waste.

Branch Generated Liquids and Solids (Debris)

In the course of conducting day-to-day business operations, the Branch may generate waste primarily associated with sampling customers' wastes. Such wastes may include wipes, gloves, etc. In addition, liquid wastes may be generated as a result of the decontamination of sampling equipment. The liquid and solid wastes are contained in drums which can be stored in the permitted container storage area. The waste codes associated with this waste stream will vary according to the type of waste being sampled. Branch debris (dumpster mud) is also generated when cleaning out the wet dumpsters. This material is made up of filters from parts washers, small metal parts, grease, sludge, etc. Branch-generated liquid and solids (debris) may carry the waste codes listed in Table 7.1-1.

6. WASTE ANALYSIS PLAN

General Waste Handling Procedures

Safety-Kleen provides solvent distribution, collection, and reclamation services to companies that are primarily engaged in automobile repair, industrial maintenance, and dry cleaning. Safety-Kleen operates a “closed loop” waste recovery service for the parts cleaning machines used by customers at their facilities. When the cleaning fluids become dirty and can no longer be used effectively, Safety-Kleen picks up the dirty fluids and replaces them with clean fluids. The dirty fluids are returned to Safety-Kleen where they are recycled and subsequently reused by customers. Approximately two-thirds of the cleaning fluids provided as product by Safety-Kleen have been use before and subsequently reclaimed. Safety-Kleen’s customers typically are small quantity generators who operate businesses which generate only a few hazardous waste streams. These factors help ensure that Safety-Kleen will receive a highly predictable and homogeneous waste stream.

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

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

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

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

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

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

Each incoming and outgoing shipment is recorded in the facility's operating log. In addition, each sales representative reviews acceptance criteria each time a waste is picked up. In accordance with Safety-Kleen's pre-printed documents, all generators sign a

statement with each shipment that there has been no material added to the closed-loop products supplied by Safety-Kleen since the last shipment. Finally, selected environmental reviews, such as periodic inspections of customer solvent containers by the Environmental manager and Branch management, may be utilized to guard against the addition of other wastes into the generator's wastes.

If a waste is rejected at the time of service based on the volume or consistency discrepancies, the customer will be given a choice as to whether they will dispose of the waste or will request Safety-Kleen's assistance. If a customer requests Safety-Kleen's assistance, a sales representative will contact the customer to see if they have direct knowledge of what may have been added during the process to make the waste non-conforming. If this cannot be determined, a properly trained sales person will obtain a representative sample using appropriate sampling equipment for the material in question. The sample will be sent to a certified laboratory and analyzed for flash point, volatile organic compounds, and other parameters to adequately define the constituents (e.g., for halogenated organic compounds, PCB's, flash point, etc.). If the waste is within the acceptable range for wastes permitted for storage, it will be relabeled and manifested, and then managed with the other wastes. If it is not acceptable, it will either be: (a) managed on a 10-day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and shipped directly to a properly permitted reclamation or disposal facility.

Annual Re-Characterization Program

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

the AR process to generators so they can use their site specific information to determine the applicability of these codes to their wastes.

Qualitative Waste Analyses

General Inspection Procedures

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

If a particular container of waste does not meet the established acceptance criteria, the Safety-Kleen service representative will reject the container at the customer's place of business. At the customer's request, a sample may be collected and analyzed by an accredited laboratory to determine whether it can be managed by Safety-Kleen. All Safety-Kleen personnel involved in sampling receive training on "Sampling Hazardous Materials and Wastes", which includes use of proper sampling equipment, preservation, labeling, chain- of-custody and other tasks associated with representative sampling. Depending on the source, the waste will be analyzed for parameters related to the suspected source of the waste. Alternately, the customer may choose to dispose of the material by using another (non-Safety-Kleen) facility.

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

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

Waste-Specific Criteria

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

Spent Parts Washer Solvent

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

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

The spent parts washer solvent is also visually inspected for its color. Unused parts washer solvent (150 Premium Solvent) has a greenish tint or is clear. The aqueous parts cleaner is also clear. As the solvent is used, it changes color. The specific color which the solvent turns is dependent upon the type of equipment being cleaned. For example, solvent used at automotive shops changes to brown or black, while solvent used by silk screeners will change to the color of the inks (red, blue, pink, green, etc.). If the spent solvent color does not appear to be consistent with the type of equipment being cleaned, the service representative may sample the waste for possible contamination as described above, or he/she will reject the waste.

Immersion Cleaner

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

Dry Cleaner Wastes

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

Spent Filter Cartridges

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

Powder Residue

The criteria for the acceptance of powder residue are consistency and color, the former

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

Still Bottoms

The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is too thin, the waste may be sampled for contamination in accordance with the procedures described above, or it will be rejected. In addition to the consistency, the still bottom waste is inspected for color. The waste should appear dark brown or black in color. If the waste is a different color, a service representative may sample the waste for contamination in accordance with the procedures described above, or he/she will reject waste.

Paint Wastes

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

Lacquer Thinner Waste

The significant criteria for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in 5-gallon containers. The paint gun cleaning machine operates as a closed system consisting of a 5-gallon container for fresh lacquer thinner and a 5-gallon container for spent lacquer thinner. The closed system is designed such that there should never be a combined volume of more than 7.5 gallons of solvent in the two 5-gallon containers. The fresh solvent container starts with 5 gallons

of clean solvent and the spent solvent starts with 2.5 gallons of clean solvent. As the machine is used to spray guns, the fresh solvent is pumped from a tube in the fresh solvent container through the machine and into the spent solvent container. This cleaning/degreasing process will continue until the volume of solvent in the fresh container reaches the 2.5-gallon mark. A tube in the fresh solvent extends half way down the container (i.e., to the 2.5-gallon mark). Any solvent above 2.5 gallons in the fresh solvent container at the time of servicing will be pumped through the machine into the spent solvent container by the Safety-Kleen service representative. Therefore, when the machine is serviced, the spent solvent container will always contain 5 gallons of solvent. If a service representative discovers more than a total of 7.5 gallons of solvent in the two containers or there is an overfill from the spent solvent container, the waste may be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

Paint Waste

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

Mercury-Containing Lamps and Devices

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

Waste Sampling and Analyses

If, after inspecting a waste stream for volume, consistency, and or color, a service representative suspects the waste may be non-conforming he will reject the container. If authorized by the customer, a properly trained sales representative will sample the waste following the protocol found in Safety-Kleen's "ET_143 Sampling Hazardous Materials and Wastes". The sample will then be delivered to an accredited laboratory for analysis. Safety-Kleen's sales representative will have discussions with the generator to see if they have information regarding what may have been introduced to the waste stream. If information is not available the sample may be analyzed for pH, flash point, PCB's, volatile organic compounds, and semi-volatile organic compounds to properly characterize the waste stream. The tables listed below outline sampling methods, parameters, test methods, and frequency of analysis that may be used as part of this process:

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

In addition, analyses are performed at the Safety-Kleen recycle facilities to safeguard the recycling process and to assure the product quality. Each waste material is sampled and analyzed upon receipt of each waste load as required by their permit and associated waste analysis plan for the receiving recycle center. In order to properly and safely process waste generated by the Branch, the recycle center samples and analyzes each waste load as it is received from the branch.

In addition to the aforementioned analyses, TCLP analyses for all compounds, except pesticides, will be conducted every year on all characteristic hazardous waste streams (example: used parts washer solvent and immersion cleaner #699) as part of the Annual Re-Characterization Program.

7. REQUIRED RECORDS AND REPORTING

Waste Manifests

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

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

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

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

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

Required Notices

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

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

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

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

Operating Record

An operating record which contains the information required under 40 CFR 264.73 is maintained and all records and logs are available at the facility, in accordance with 40 CFR 264.74. A copy (paper) of the operating record is retained at the facility to comply with 40 CFR 264.73(b).

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

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

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

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

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

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

Land Ban Notification/Certification Forms

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

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

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

The facility will comply with the RCRA permitting conditions found in 40 CFR Part 270.30(l)(1), 270.30(l)(2), and 270.30(l)(6).

The facility will comply with the recordkeeping requirements found in 40 CFR Part 264.1064 and 264.1089.

Part II. General A.8

The Federal laws found in 40 CFR Part 270.3 do apply to Safety-Kleen although they do not appear to be applicable at this time.

**TABLE 7.1-1
PERMITTED AND TRANSFER WASTES**

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent	S01* S02**	374	D001 and D-codes listed in Note below
Branch-Generated Liquids Solids (Debris)	S01*	9	D001 and D-codes listed in Note below; F001, F002, F003, F004, F005
Dumpster Sediment	S01*	Included above	D001 and D-codes listed in note below
Tank Bottoms	S01*	Included above	D001 and D-codes listed in note below
Used Immersion Cleaner (IC 699)	S01*	6	D-codes listed in note below
Dry Cleaning Waste (Perchloroethylene)	S01*	7	F002 and D-codes listed in note below
Dry Cleaning Waste (Non-perchloroethylene)	S01*	Included above	D-codes listed in note below
Paint Wastes	S01*	18	D001, F003, F005 and D-codes listed in note below
Fluid Recovery Service (FRS)	S01***	100	Transfer wastes-waste codes assigned by generator
Mercury-Containing Lamps/Devices	N/A***	Less than 2.2	N/A-handled as non-hazardous transfer wastes

NOTES:

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

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

** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled to 19,000 gallons

*** This waste will be held for transfer in containers in the transfer area and designated mercury bulb storage area

TABLE 7.2-1
PARAMETERS AND RATIONALE
FOR HAZARDOUS WASTE IDENTIFICATION

Hazardous Waste	Parameter*	Rationale
1. Used Parts Washer Solvent	Flash Point TCLP	May exhibit ignitable characteristics (D001) may contain TCLP compounds
2. Parts Washer Solvent Machine Tank Bottom Sludge and Free Water	TCLP Flash Point	The sludge and free water may contain TCLP compounds
3. Used Immersion Cleaner (IC699)	TCLP	May contain TCLP compounds.
4. Dry Cleaning Wastes (Perchloroethylene)	TCLP	Contains ingredients of F002 and may contain TCLP compounds
5. Dry Cleaning Wastes (Naphtha)	TCLP	May contain TCLP compounds
6. Paint Wastes	Acetone Isopropyl Alcohol Methyl Ethyl Ketone Toluene, Xylenes Acetate Compounds Flash point, TCLP	Contains ingredients of F003 and F005 wastes, and may contain TCLP compounds. May exhibit ignitable characteristics (D001)
7. Aqueous Brake Cleaner	TCLP	May contain TCLP compounds

TABLE 7.2-2
PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference
pH	pH Meter	ASTM Standard D1293-65
Flash Point	Tag closed cup tester	ASTM Standard D56-79
TCLP	Toxicity Characteristic Leaching Procedure	40 CFR 261, Appendix II
Hydrocarbons and Volatile Organics	Gas Chromatography (GC)	Methods Based on "Test Methods for Evaluation of Solid Waste, Physical/ Chemical Methods," SW-846, USEPA and ASTM Standards. In particular 8240 and 8270.

TABLE 7.2-3
METHODS USED TO SAMPLE HAZARDOUS WASTES

Hazardous Waste	Reference for Sampling	Sampler	Description of Sampling Method
1. Used Parts Washer Solvent	Sampling a tank "Samplers And Sampling Procedures For Hazardous Waste Streams," EPA/600/2-80/018	Test Methods for the Evaluation of Solid Waste Physical/ Chemical Methods, Sw-846, USEPA	For tanks-Bomb sampler (similar to Weighted bottle sampler) For drums - Coliwasa®
2. Parts Washer Solvent, Machine Bottom Sludge, And Free Water	Same as 1	Same as 1	For sludges - Trier sampler
3. Used Immersion Cleaner IC699	Same as 3	Same as 1	Coliwasa®
4. Dry Cleaning Wastes	Same as 3	Same as 1	For liquids - Coliwasa®
5. Paint Wastes	Same as 3	Same as 1	For liquids - Coliwasa® For sludges - Trier
6. Aqueous Brake Cleaner	Same as 3	Same as 1	Same as 3

TABLE 7.2-4
FREQUENCY OF ANALYSIS OF HAZARDOUS WASTES

Hazardous Waste	Frequency^a
1. Used Parts Washer Solvent	Gas chromatograph annually, Flash point annually, TCLP annually, as needed for suspected non-conforming waste
2. Parts Washer Solvent, Tank	Gas chromatograph annually, TCLP annually, as needed for suspected non-conforming waste
3. Used Immersion Cleaner 699	Gas chromatograph annually, TCLP annually, as needed for suspected non-conforming waste
4. Dry Cleaning Wastes	Gas chromatograph annually, TCLP annually, as needed for suspected non-conforming waste
5. Paint Wastes	Gas chromatograph annually, TCLP annually, as needed for suspected non-conforming waste
6. Aqueous Brake Cleaner	Gas chromatograph annually, TCLP annually, as needed for suspected non-conforming waste

NOTES:

- ^a In accordance with 40 CFR 264.13(a), Safety-Kleen will also perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste to be collected does not match the waste designated.

Part II

B. CONTAINERS

The hazardous waste container storage area is depicted in Figure 8-1. The warehouse is used for storage of virgin materials, permitted hazardous wastes, and transfer wastes. The location of the permitted storage area is shown in Figure 8-1.

CONTAINMENT SYSTEM

The container storage area (47' 7" x 34' 1") shown in Figure 8.1-1 occupies the northwestern portion of the warehouse (47' 7" x 78' 6"). This warehouse area has concrete floors, and a central collection trench to form a spill containment system within the area.

The containment volume is composed of the sloped concrete floor and the collection trenches. The containment calculations are illustrated in Figure 8-2. The total containment volume was measured at 2,077 gallons. Therefore, the maximum storage capacity is 20,770 gallons. The amount of waste that is permitted to be stored in the container storage area is 6,912 gallons. Waste allowed for storage is immersion cleaner, dry cleaning solvent, parts washer solvent dumpster mud, tank bottoms, paint related wastes and oil filters. The types and number of each type of container may vary; however, the storage capacity will not be exceeded. Virgin materials (product) is stored in the southern portion of the warehouse building.

FRS Waste and Transfer Wastes

Transfer wastes may be stored in the southern portion of the permitted container storage area, and northwestern portion of the Return/Fill area (Figure 8-1). Since FRS wastes are transfer wastes only, they are not required to have containment, although these two areas are provided with secondary containment.

The containment area in the warehouse has been coated with Sikagard® 62 or equivalent. This material, when properly applied, is capable of withstanding the products handled by Safety-Kleen. Other coatings may be used in the future and will be evaluated by Safety-Kleen to ensure, when properly applied, they are capable of withstanding the products handled by SK. The warehouse is completely enclosed to prevent precipitation from entering. In the event the buildings sprinkler system is activated, the secondary containment system should be sufficient to contain the water. Any firewater released to the secondary containment system will be properly characterized, and disposed of, according to federal, state, and local regulations.

Spills from containers are removed by a hand-held, portable electric pump (the COMS pump), wet-dry vacuum, or sorbent materials. Since the characteristics of the stored wastes are known, no analyses are performed for the materials collected from the containment area. All collected materials are sent to a RCRA permitted recycling/reclamation facility.

Any small spill which might occur would generally puddle where it was spilled. The spilled material would be cleaned up where it puddles or be manually directed to the containment trench. In the event that a large spill were to occur, some dispersion would be expected to occur based on the direction, force, and pathway obstacles presented by and to the spill. Only a catastrophic event would result in an exceedance of the 2,077-gallon containment capacity. In this case, once outside the containment area, the wastes would flow onto paved surfaces outside the building. These are the same surfaces that serve to protect soils and ground water from contamination due to spills occurring during loading/unloading.

Container Movement

In the container storage area, containers are handled with a hand-truck or forklift that is free of sharp points. Every time a drum is moved, a chance exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, containers are tightly covered and kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into another safe container. Each route truck is equipped with a lift-gate or an electric hoist. These devices are used in the loading/unloading operation to minimize chances for spillage and/or employee injury. With the exception of parts washer solvent, drummed wastes may be loaded/unloaded at the dock on the west side of the building. The parts washer solvent is loaded/unloaded at the return/fill station.

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

INCOMPATIBLE, IGNITABLE, AND REACTIVE WASTE MANAGEMENT

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

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

Procedure for Managing Waste Types

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

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 of the office area. No other smoking areas are designated. The parts washer solvent handling area and the aboveground storage tanks are separate from the warehouse 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:*

- become subject to extreme heat or pressure, fire, 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.
- 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.
- produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion – See above and below.
- 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.

External Factors

The design of the facility 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 (Section 5)
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 covered 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 weather.
6. *Hurricanes* – Facility will follow the procedures within the contingency plan.

Run On

The container storage area is 2' above grade in order to prevent and manage run on per 40 CFR Parts 264.175(b)(4) & 270.15(a)(4).

CONTAINER MANAGEMENT

General Protocols

Container management is of paramount importance to Safety-Kleen. All containers are routinely inspected to ensure that the containers are in good condition. If rusting or structural defects are visible, or if the container begins to leak, the contents of the container are immediately transferred to a new sound container. Over-pack containers are commonly used for the management of containers whose integrity has been compromised. Hazardous waste containers are always kept closed during storage except when adding or removing waste. Containers are not handled or stored in a manner that could potentially cause a rupture or leak.

Specific Waste Stream Containers

Parts washer solvent is collected in containers and generally emptied into the wet dumpster at the return/fill station (which is piped to the tank farm). 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.

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

Dry cleaning waste is stored in steel or polyethylene containers and consists of perchloroethylene-based waste and naptha-based waste. The contents of the dry cleaning waste containers are not removed or processed at the Sanford Branch. It is stored as permitted waste prior to shipment to a permitted Safety-Kleen TSDF.

Paint wastes consist of various lacquer thinner and paints. The waste is collected in containers at the customer's location and the containers are then stored in the container storage area of the warehouse. The paint wastes are managed as permitted wastes.

FRS wastes are stored in steel or polyethylene containers that are compatible with the material in them. FRS wastes are managed as transfer wastes.

As part of its protocol for handling mercury-containing lamps and devices destined for recycling, the Branch provides customers with four-foot and eight-foot boxes which hold up to 39 lamps. Boxes are inspected prior to transport from the customer to the Branch. Boxes containing broken lamps are not accepted by Safety-Kleen. If the lamps are broken while in the custody of Safety-Kleen, the entire contents of the box are sealed in plastic shrink wrap or transferred to another container and closed. The boxes are picked up at customer locations and are stored at the Branch in a designated area within the container storage area (Figure 8.1-1). The boxes used to store mercury-containing lamps and devices are labeled in accordance with Florida Administrative Code (FAC) 62-737.400(5)(b). The boxes are periodically shipped to a permitted mercury recovery or reclamation facility.

Safety-Kleen sells its' own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. These containers are stored in the warehouse until being is shipped to SK distribution centers. From there the used antifreeze is shipped to 3rd party recyclers.

Safety-Kleen handles all types of batteries with the exception of lithium batteries. Batteries are stored in 5- and 16-gallon poly containers. Lead acid batteries may be stored on pallets secured by plastic straps. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting those standards may be managed as 10-day transfer waste.

CONTAINER INSPECTION

The purpose of the container 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, maintain compliance, and prevent the release of hazardous wastes to the environment. The Branch Manager or designee is responsible for carrying out the inspections of all hazardous waste management facilities in accordance with the following procedure and schedule.

An example of the Daily Inspection Log for the container storage area and associated loading/unloading areas is presented in Figure 8.4-1. This Daily Inspection Log, or equivalent, will be used during daily inspections. Weekly container storage area inspections include the following:

- Verify that total volume is within permitted limits.
- Physically examine the condition of containers to verify that leaks have not occurred since the last inspection;
- Verify that all container identification, dates, and hazardous waste labels are attached and current;
- inspect container placement and stacking such as aisle space, height, and stability of stacks; and
- Examine containment areas to detect signs of deterioration and failure of the containment system such as cracks, breakage, settlement, and spillage.

As deficiencies are detected, the Branch Manager will ensure that they are remedied promptly. Any deficiencies which could create an environmental or human health hazard will be rectified immediately.

Other inspections at the facility include those performed on a weekly basis for the security systems. These inspections are described in the contingency plan.

CONTAINER STORAGE AREA CLOSURE PLAN

The container storage area closure plan and closure cost estimates are provided as part of the overall closure plan for the facility in Part II K.

FIGURE 8-1
CONTAINER STORAGE AREAS
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

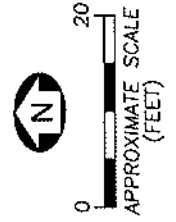
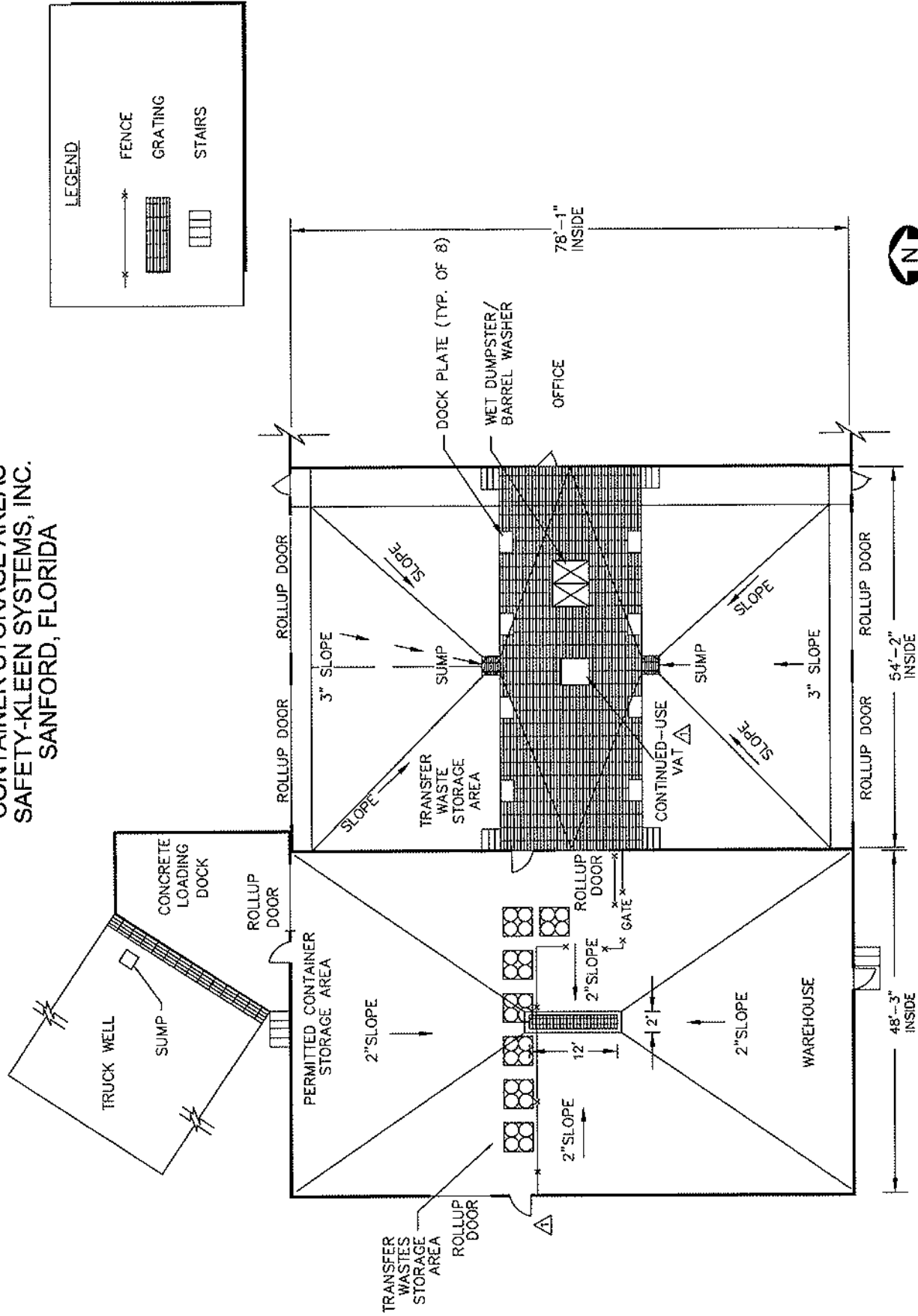


Figure 8.4-1 (page #1)
Safety-Kleen Sanford, Florida

Daily Inspection of Warehouse Container Storage Area – Maximum Permitted Volume 6,912 gallons
Inspectors Name/Title:

Monday	Tuesday	Wednesday	Thursday	Friday

DATE (MM/DD/YY)

TIME	Monday	Tuesday	Wednesday	Thursday	Friday
Volume in containers					
Branch Generated – 55 gallon					
Oil/Vac samples – 55 gallon					
Used Oil Filters – 30 gallon					
Used Oil Filters – 55 gallon					
Immersion Cleaner					
Paint Waste – 55 gallon					
Paint Waste – 30 gallon					
Paint Waste – 16 gallon					
Paint Waste – 5 gallon					
Dry Clean – 16 gallon					
Dry Clean – 30 gallon					
Dry Clean Filters – 16 gallon					
Dry Clean Filters – 30 gallon					
Oil Filters – 55 gallon					
Used Antifreeze – 55 gallon					
Used Solvent					
Silver recovery – 5 gallon					
Silver recovery – 20 gallon					
TOTAL VOLUME (GALLONS)					
Batteries – 5 gallon					
Batteries – 16 gallon					
Fluorescent bulbs – 4 ft.					
Fluorescent bulbs – 8 ft.					
Mercury Devices					

Transfer Storage Areas

FRS – 5 gallon				
FRS – 16 gallon				
FRS – 30 gallon				
FRS – 85 gallon				
FRS – 350 gallon tote				
Wrangler bag/Gaylord				

Figure 8.4-1 (page #2)

Waste Volume: A N A N A N A N A N

If "N", what is the reason: _____

Condition of Containers: A N A N A N A N A N

If "N" circle appropriate problem: missing or loose lids, incorrect or incomplete labels, rust, leaks, distortion, other: _____

Stacking/Placement/Aisle Space:

 A N A N A N A N A N

If "N" circle appropriate problem: different from Part B floor plan, containers not on pallets, unstable, broken or damaged pallets, or other: _____

Containment: A N A N A N A N A N

Curbing, floor and sumps:

(Any material which accumulates in the secondary containment must be completely removed within 24 hours of being discovered) If "N" circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.) displacement, leaks inadequate sealant, or other: _____

Loading/Unloading Areas:

 A N A N A N A N A N

If "N" circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

Observations, comments, date and specific nature of repairs of any items indicated as "Not Acceptable" (N): _____

A = Acceptable N = Not Acceptable

Part II

C. TANK SYSTEM

ENGINEERING ASSESSMENT OF TANK SYSTEM

An engineering assessment of the tank system was conducted in September 2013. The report is provided in Appendix C.

TANK SYSTEM SPECIFICATIONS

The facility includes five aboveground steel tanks. Four 20,000- gallon steel tanks in the above ground storage tank farm, and one 12,000-gallon double walled steel tank adjacent to the tank farm (Figure 9.2-1). Hazardous waste used parts washer solvent is returned from Safety-Kleen's customers in containers and the solvent is transferred via the wet dumpsters into a 20,000-gallon tank, prior to bulk shipment to Safety-Kleen recycle center. The other four tanks, include two 20,000-gallon tanks (Used Oil), and one 20,000-gallon tank (Clean Solvent), and one 12,000 gallon tank (Used Antifreeze). These four tanks are not considered RCRA tanks. All of the tanks are grounded.

Material Compatibility

Waste stored in the RCRA tank at this facility is used parts washer solvent. The parts washer solvent is compatible with the mild steel tank structure. As with all petroleum storage vessels, water will accumulate over time due to condensation and the water will accumulate in the bottom of the tank.

Tank Operation Procedures and Design

Used solvent is returned from customers via containers and poured into the wet dumpsters which have barrel washers enclosed within them. The container is then placed on roller brushes within the barrel washer. As the machine is turned on, the container rotates on the brush and the outside of the container is cleaned. A nozzle in the barrel washer sprays a stream of solvent into the bottom of the container to flush the inside of

the container. The machine is then turned off and the container is removed. This process takes several seconds per container. The container is then refilled with clean solvent using a pump and nozzle assembly similar to a gasoline dispenser. The waste is transferred to the tank via piping and a pump.

The used solvent is fed to a sump in the bottom of the wet dumpster and automatically pumped to the used parts washer solvent storage tank. A basket within the sump collects sludge from the cleaning operations. Periodically, this basket is removed and sludge is removed and placed into a sludge drum for disposal. The wet dumpsters are located in the return/fill station, which is underlain by a secondary containment structure.

The used solvent storage tank is designed and constructed to be compatible with the materials stored. The tank has an emergency vent and pressure/vacuum vent that were installed in accordance with National Fire Protection Association (NFPA) standards, and is equipped with a high-level alarm. A 3" emergency gate valve is located at the base of the tank where the outgoing piping is threaded into the tank. The tank seams are lapped with full fillet welds. The weld was performed with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer). The used solvent tank was installed new in 1991. The tank is aboveground, supported by an insulated carbon steel skirt that is anchored to a concrete pad. The tank is supported on an 8-inch skid that is placed on an 8-inch concrete foundation slab. Therefore, no surface run-on will contact the wastes stored at the site and no run-off collection system is required. To minimize the amount of precipitation that may collect inside the containment area, a canopy has been installed over the tank farm. If rainwater does accumulate in the containment area and it has been verified that no spill has occurred, the rainwater will be discharged to the ground surface. Only the Branch Manager or someone operating under his/her direct orders may discharge to the ground surface. If it is not possible to verify that a spill has not occurred, the rainwater will be disposed of in the wet dumpsters.

Controls and Spill Prevention

The tank farm dike and the return/fill station have been sealed with a chemical resistant

coating. The hazardous waste solvent tank has been fitted with a Moormann Analog Automatic Tank Gauge (information on the gauge is provided at the end of this section). Level gauges are used to measure liquid levels in tanks. Float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tanks being 95% full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. The gauges of the tank are read before filling the tank with additional material. Tank level readings are also taken prior to the filling of a tanker truck to prevent overfilling of the truck or tank. A tanker truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the above-ground tanks. The tank should be operated at a maximum volume of 19,000 gallons (95% of capacity). The secondary containment under the tanks and return/fill station is cleaned within 24 hours of a spill, or in as timely a manner as possible, to prevent harm to human health and the environment.

2" single-walled steel piping from the wet dumpsters in the return/fill area to the top of the hazardous waste solvent tank is connected by threaded connectors. This piping runs under the dock and leaves the warehouse building on the south side of the return/fill station. At that point the piping system continues south towards the tank farm and is outside secondary containment (this part of the system has welded connectors). Once it reaches tank farm secondary containment the piping runs vertical to the top of the tank. The piping system leaving the tank is constructed of 3" single-walled steel and is inside secondary containment. Figure 9.1-1 details the system.

Leak Detection System

The Safety-Kleen Sanford branch will be installing an automatic leak detection system at the above ground storage tank farm for the hazardous waste solvent tank. This system will enable detection of leaks, or releases, to the secondary containment 24-hours a day. The system consists of an Intellipoint sensor, which is placed beside the tank at

the base of the secondary containment structure. The sensor detects the presence or absence of liquids. It will be monitored 24-hours a day, seven days a week, by a 3rd party (Protection One). If the sensor detects liquid it will immediately send a warning notice to Protection One, who will then immediately call the emergency coordinator for the Orange Park branch. This system will allow continuous leak detection monitoring when the facility is not occupied. Information on this system can be found at the end of Part II.C. We anticipate the system to be installed by December 31, 2013.

IGNITABLE OR REACTIVE WASTE REQUIREMENT (40 CFR PART 264.198(b))

The owner or operator of a facility where ignitable or reactive waste is stored or treated in a tank must comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code," (1977 or 1981), (incorporated by reference, see Sec. 260.11) (264.198(b)).

TANK SYSTEM SECONDARY CONTAINMENT

Tank Containment

The three tanks in the above ground storage tank farm are underlain by a 56'7" x 38'8" concrete slab, surrounded by a 3' high concrete wall. The wall height in the containment varies with the floor slope and directs flow toward an approximately 35-gallon blind sump. No surface run-on or precipitation will contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. A metal canopy installed over the tank farm minimizes the chance of precipitation accumulating inside the containment area. The layout of the tank farm is shown in Figure 9.2-1. Tank farm containment calculations are shown in Figure 9.2-2. Containment volume was estimated to be 28,092 gallons. This volume represents greater than 100 percent of the capacity of the largest tank within the containment area.

The containment areas have been coated with Sikagard® 62 or equivalent. Inspections of the sealant in the containment areas will be conducted as described in Tank System Inspections. If the sealant is found to be worn or deteriorated such that repairs are warranted, the sealant will be repaired in accordance with manufacturers' specifications.

Return/Fill Containment

The return/fill station is a 54' 2" x 78' 9" structure (Figure 9.3-1) located between the warehouse and paint waste shelter. It contains two wet dumpsters which handle the flow of waste solvent to the hazardous waste storage tank. These dumpsters are not intended for storage but can hold a maximum of 216 gallons (108 gallons per dumpster).

The area is designed such that the route trucks can be backed into the containment area. The roof extends over the truck unloading area so that no precipitation can get into the return/fill station containment area. The containment for the return/fill station is provided by two blind sumps, with a total capacity of approximately 35-gallons. The floor in the return/fill station is sloped to direct flow toward the two sumps. The total containment was estimated to be 3,745-gallons, as shown in Figure 9.2-2.

TANK SYSTEM INSPECTIONS

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. Figure 9.4-1 is an example Daily Inspection Log for the tank system. This Daily Inspection Log, or equivalent, will be used during daily inspections. Daily inspections of the tank and dumpsters will consist of the following:

- Note volume in tank.
- Observe tank exterior for loose anchoring, wet spots, leaks.

- Check the automatic high level alarm. In addition, measure the depth of used solvent in the tanks to confirm the proper functioning of the automatic alarm system and to determine unexpected deviations in tank measuring data, or a sudden drop in liquid level, which may indicate leakage.
- Inspect secondary containment coating, walls, and piping (All piping is above ground).
- Inspect transfer pumps for leaking seals and overheated motors.
- Inspect the solvent dispensing hose, fittings, and valve for any leaks, damage, or wear that could cause a leak to develop.
- Inspect the valves for evidence of leaking. Stem leaks from worn glands and warped valve bodies should be repaired. If the valve cannot be repaired, replace the unit.

Also, the tanks will be visually inspected and tested periodically. The period of time between tank inspections, including shell thickness testing, will not exceed ten years. This time frame for tank inspection is adequate based on Safety-Kleen's experience at its other facilities in Florida. Daily inspection of the solvent return receptacle (wet dumpster) will consist of an inspection for leaks and excess dumpster mud build-up.

TANK SYSTEM CLOSURE AND CONTINGENT POST-CLOSURE PLAN

The tank system closure plan is provided as part of the overall closure plan for the facility in Part II K. As discussed below, a contingent post-closure plan for the tanks is not required.

TANK SYSTEM CONTINGENT POST-CLOSURE PLAN

The tank system at the Sanford facility meets the secondary containment requirements of 40 CFR 264.193, and is, therefore, not required to have a contingent post-closure plan under 40 CFR 264.197(c). In addition, Safety-Kleen intends to remove or decontaminate

all tank system components, associated containment systems, and contaminated soils (if any) at the time of closure. However, should future conditions indicate that all contaminated soils and tank system components cannot practicably be decontaminated or removed, then a plan to perform post-closure care in accordance with the post-closure care requirements that apply to landfill (40 CFR 264.310) will be prepared for implementation upon FDEP approval.

RESPONSE TO LEAKS AND DISPOSITION OF UNFIT-FOR-USE TANK SYSTEMS

In the event that a leak or spill were to occur from a tank system or secondary containment system, the actions identified herein will be undertaken.

Immediate Response

All waste flow to the tank system in question will be ceased immediately. An inspection will be undertaken to identify the cause of the release. Waste flow to the tank system will not resume until the tank system has been inspected, repaired, and declared fit for use. In order to prevent further released, or to allow inspection and a repair of the system, it may be necessary to remove the waste from the tank system. This waste removal will occur within 24 hours after detection of the leak, or at the earliest practicable time.

All material released to the secondary containment area will be removed within 24 hours, or in as timely a manner as possible, to prevent harm to human health and the environment. Every reasonable effort will be made to prevent migration of the release to soils or surface water. If necessary, visible contamination of surface water and soil will be removed and properly disposed of.

Notifications

Spills less than, or equal to one pound are exempt from reporting requirements per 40 CFR Part 264.196(d)(2). All other releases require notification as described in the Contingency Plan.

Subsequent Reporting

Subsequent reporting will be completed as referenced in the facility Contingency Plan.

Repair or Closure

If the integrity of the containment system has not been damaged, the system may be returned to service as soon as the released waste is removed and repairs, if necessary, are made. If the tank was the source of the release, the tank must be repaired prior to returning the tank system to service. If the release was from a tank system component which did not have secondary containment, then secondary containment must be provided for this component before the system can be returned to service. The exception to this is if the component can be visually inspected. In this instance, the component may be repaired and returned to service. If a component is replaced, the component must satisfy the requirements for new tank systems and components.

All major repairs must be certified by an independent, registered, professional engineer in accordance with 40 CFR 270.11(d). The engineer must certify that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. This report must be filed with the Agency within seven days after returning the tank system to use.

If repairs that meet these requirements cannot be performed, the tank system must be closed in accordance with the closure plan.

FIGURE 9.1-1
WASTE SOLVENT PROCESS FLOW
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

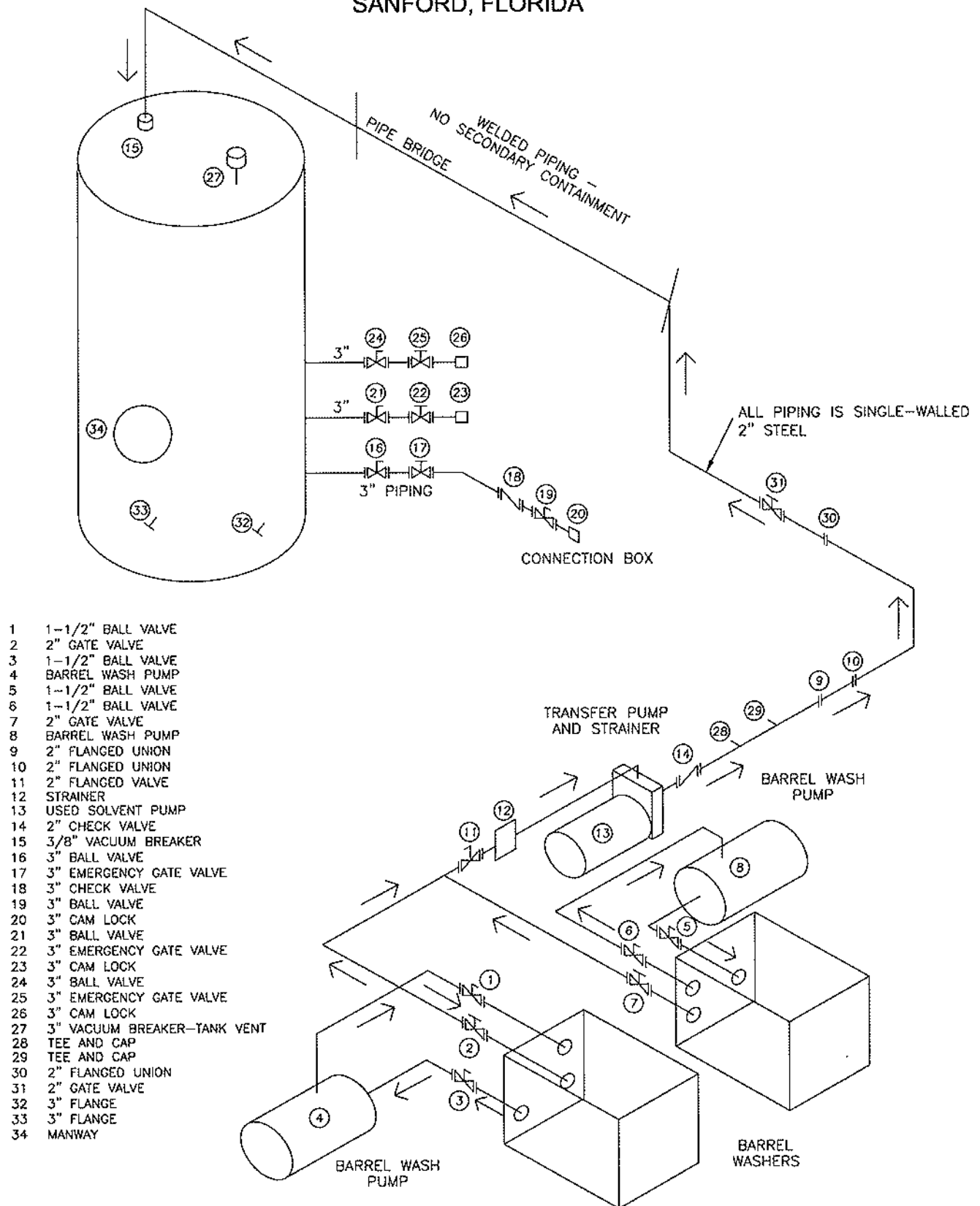
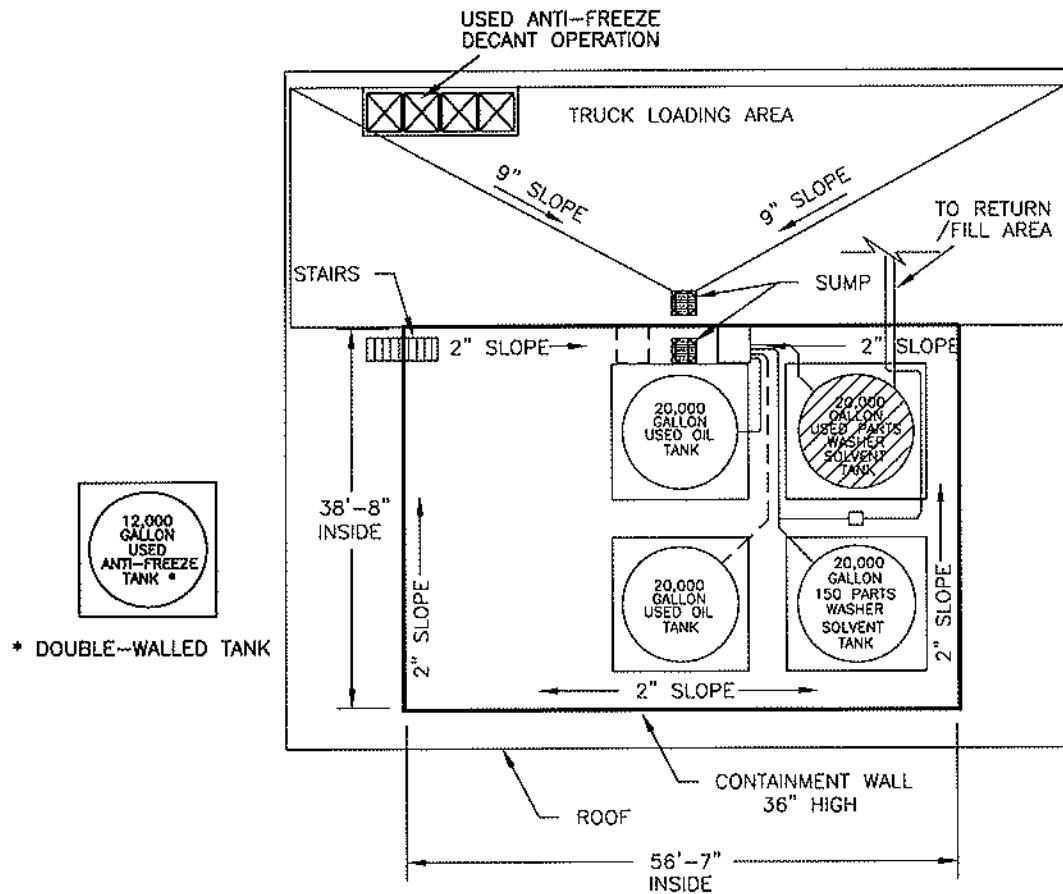


FIGURE 9.2-1
TANK STORAGE AREA
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA



LEGEND



HAZARDOUS WASTE
TANK

NOTE: ENTIRE AREA IS CONCRETE

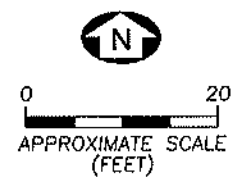
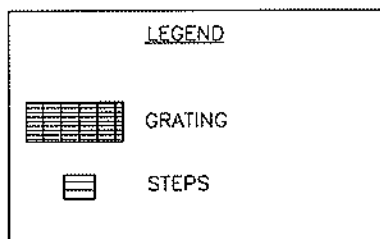
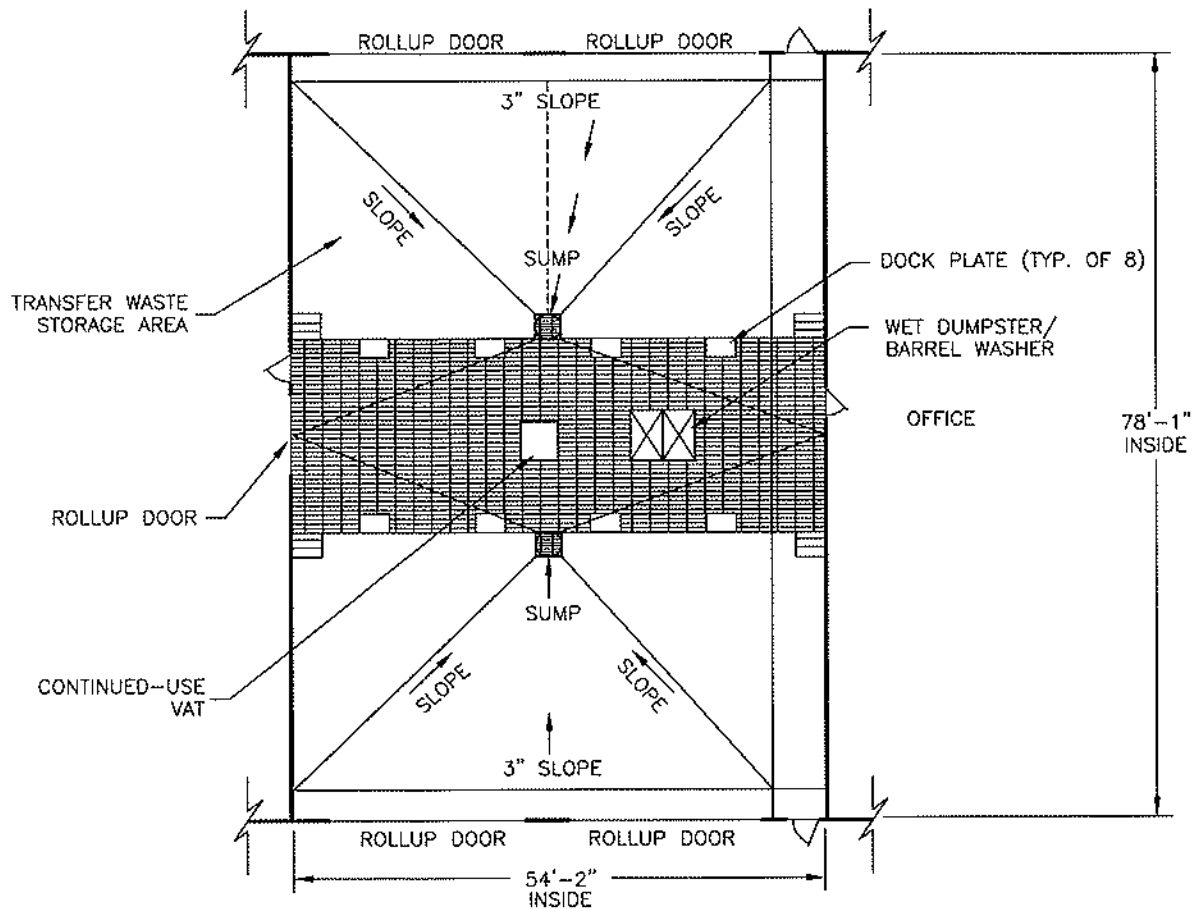


0 20
APPROXIMATE SCALE
(FEET)



ERM.

FIGURE 9.3-1
RETURN/FILL SHELTER
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA



ERM.

Figure 9.4-1 (page #1)
Safety-Kleen Sanford, Florida – Storage Tank System Inspection

Inspectors Name/Title:

Date:

Inspectors Signature:

Monday	Tuesday	Wednesday	Thursday	Friday
Date:	Date:	Date:	Date:	Date:
Time:	Time:	Time:	Time:	Time:

STORAGE TANKS: (Tanks must never be more than 95% full)

Tank	Monday	Tuesday	Wednesday	Thursday	Friday
Waste Solvent (in/gal.) x 54 #1					
Clean Solvent (in/gal.) #2					
Used oil (in/gal.) #3					
Used oil (in/gal.) #4					
Used Antifreeze (in/gal.)					

Vacuum Gauge Reading Weekly _____ Date _____

Item	Monday	Tuesday	Wednesday	Thursday	Friday
Tank Exterior	A N	A N	A N	A N	A N
If "N" circle appropriate problem: rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other:					
High Level Alarms	A N	A N	A N	A N	A N
If "N" circle appropriate problem: malfunctioning "Power On" light, malfunctioning siren/strobe light, other:					
Volume gauges	A N	A N	A N	A N	A N
If "N" circle appropriate problem: disconnected, sticking, condensation, other:					

Containment Area (Tank Dike)

Item	Monday	Tuesday	Wednesday	Thursday	Friday
Bottom and walls	A N	A N	A N	A N	A N
If "N" circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots, stains, sealant is pitted, cracked or chipped, deterioration, leaks, other:					
Rigid piping and supporters	A N	A N	A N	A N	A N
If "N" circle appropriate problem: distortion, corrosion, paint failure, leaks, other:					

Observations, comments, date and nature of repairs of any items indicated as "Not Acceptable": _____

A = Acceptable N = Not Acceptable

Figure 9.4-1 (page #2)
Storage Tank System Inspection

Inspectors Name/Title:

Inspectors Signature				
Monday	Tuesday	Wednesday	Thursday	Friday

DATE (MM/DD/YY)

TIME

	Monday	Tuesday	Wednesday	Thursday	Friday
Transfer pumps & hoses					
Pump Seals:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: leaks, other: _____					
Motors:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: overheating, other: _____					
Fittings:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: leaks, other: _____					
Valves:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: leaks, other: _____					
Hose Connections & Fittings:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: leaks, other: _____					
Hose Body:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: leaks, other: _____					

Return/Fill Station

Drum Washer:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: leaks, other: _____					
Secondary Containment:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: leaks, other: _____					
Loading/Unloading Area:	A N	A N	A N	A N	A N

Observations, comments, date and specific nature of any items indicated as "Not Acceptable": _____

A = Acceptable N = Not Acceptable

Part II

K. CLOSURE PLAN

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

In the event that some presently unforeseen circumstance(s) would result in the discontinuance of operations and permanent closure or sale of the facility, this closure plan identifies the steps necessary to close the facility at any point during its intended life. This plan should be applied to the tanks system, container storage areas, and equipment used by the facility for hazardous waste management to accomplish the closure performance standard of 40 CFR 264.111. It is intended that all closures will be complete and final with removal of waste and decontamination of the facility and associated equipment. This will eliminate the need for maintenance after closure and the possibility of escape of hazardous waste constituents into the environment. Because closure is not anticipated for some time Safety-Kleen agrees to notify the Department when this decision is made to work with FDEP to update the closure plan using the current requirements and FDEP guidance documents.

FACILITY DATA

1. Waste Management Facility Descriptions
 - a. Aboveground Storage Tank: The tank is a 20,000-gallon steel tank. This tank is located within a containment system consisting of a 56'7" x 38'8" foundation slab with 3' perimeter walls.
 - b. Solvent Return/Fill Station: The station is a 54' 2" x 78' 9" concrete portion of the building located between the office and warehouse. It contains two wet dumpsters and a Continued Use Vat. The two active dumpsters are used to receive returned solvent from containers and pump it to the used parts washer solvent tank. These dumpsters are not intended for storage, but can

hold a max. of 216 gallons (108 gallons each).

- c. Container Storage Area: The container storage area has a 47'7" x 78' 6" portion of the building. The floors in this area are sloped toward a 2' x 12' containment trench in the middle of the area with a containment capacity of 2,077-gallons. The maximum storage capacity of this area is 20,770-gallons. Wastes allowed for storage are paint related wastes, parts washer solvent dumpster mud, tank bottoms, dry cleaning wastes, spent immersion cleaner, and oil filters.

2. Maximum Inventory of Wastes

- a. Used Parts Washer Solvent: 20,000 gallons
- b. Wet Dumpsters: 216 gallons
- c. Containerized Waste: 6,912 gallons. (Note: This includes any combination of 5, 16, 30, 55, 85-gallon containers, and 350-gallon totes used for various management purposes).

All wastes will be disposed offsite in accordance with appropriate hazardous waste regulations.

CLOSURE PROCEDURES

Container Storage Areas

- At closure, all containers present at the facility will be sent to a Safety-Kleen TSDF, or third party facility where the contents in the containers will be reclaimed and the containers cleaned for reuse. The containers will be removed and transported with proper packaging, labeling, and manifesting.
- The concrete floor, spill containment area, and walls will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, one rinsate sample will be collected from the container storage area. The rinsate sample will be analyzed by EPA method 6010 for petroleum constituents, the eight RCRA metals and nickel, and for volatile and semi-volatile organics by EPA methods 8015, 8260, and 8270. The area will be decontaminated to meet FDEP's guidance at the time of closure. The pans, grating, and floor beneath the pans in the paint waste shelter will be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle the metal components (e.g., pans and grating) in accordance with 40 CFR 261.6(a)(3)(ii) or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of these components is required only to the extent necessary for safe demolition, storage, and transportation of the scrap. Decontamination of the mercury-containing lamps and devices storage area will be conducted at the time of closure as part of the overall decontamination of the container storage areas. No additional, special decontamination of the mercury-containing lamps and devices storage area will be conducted at the time of closure, because any decontamination associated with releases from mercury-containing lamps and devices will be conducted at the time of release.

- Decontamination (i.e., detergent wash and clean rinse) fluids will be collected and contained for proper management. One representative sample of the contained fluids will be collected to determine whether the water is hazardous. This determination will be made by laboratory analysis of the sample for the metals and organics (excluding pesticides/herbicides) on the TCLP list. (Note: This wash water will be from all areas undergoing decontamination, not just from the container storage areas.)
- If the wash water or other wastes generated in the closure process are determined to be hazardous, they will be disposed of properly as a hazardous waste. Otherwise, the material will be disposed of as an industrial waste. Assumptions of wash water generation are based on Safety-Kleen's past experience from other facility closures. The generated wash water is expected to be non-hazardous based on Safety-Kleen's experience from other facility closures.
- Equipment to be used to clean this area includes mops, pails, scrub brushes, a wet/dry vacuum, and containers. The mops, pails, and scrub brushes will be containerized and disposed of as hazardous waste. The wet/dry vacuum and containers used will be washed with a detergent solution and rinsed to decontaminate them.

Solvent Return/Fill Station

- At closure, any sludge in the wet dumpsters ("dumpster mud") will be cleaned out and containerized, labeled, and manifested for proper disposal.
- The metal superstructure components of the station (i.e., the wet dumpsters and the dock grating) will be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle these components as scrap metal in accordance with 40 CFR 261.6(a)(3)(ii), or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of the components is required only to the extent necessary for safe demolition, storage, and transportation of the scrap.

- The concrete floor in the return/fill station will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the container storage area rinsate sample. The area will be decontaminated to meet FDEP's guidance at the time of closure.

Aboveground Storage Tank System

Note: The product solvent & used oil tanks will be closed in accordance with Chapter 62-762, F.A.C.

Metal Components of the Tank Storage System

- At closure, the contents of the tank will be removed to a tanker truck using existing unloading equipment and subsequently transported to a Safety-Kleen recycle center, or 3rd party facility.
- Once the contents have been drained, the tank will be opened by removing the manways and vented by supplying fresh air to the interior space of the tank. Any residual wastes will be removed via vacuum for recycling with the previously drained wastes.
- The interior of the tank as well as all associated piping and appurtenant equipment will then be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle the tank, piping, and appurtenant equipment as scrap metal in accordance with 40 CFR 261.6(a)(3)(ii), or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of the metal components is required only to the extent necessary for the safe demolition, storage, and transportation of the scrap.

Concrete Containment System

- Final disposition of the concrete containment system where the waste tank is located will depend in part upon the presence or absence of underlying soil contamination. To make that determination, the upper six inches of soil immediately below the concrete slab will be sampled at the following locations, as follows:
 1. Under the waste tank, and at the containment system pumps;
 2. Beneath the most prominent of any cracks observed in the slab, and under the tanker connections.
- Sampling locations, and the number of samples required will ultimately be determined after consultation with the Department
- These sample locations may be adjusted as actual field conditions warrant, but a minimum of two samples will be retrieved. These samples will be analyzed for petroleum constituents, and by EPA Method 6010 for the eight RCRA metals and nickel, and for volatile and semi-volatile organics by EPA Methods 8015, 8260, and 8270.
- The perimeter walls and foundation slab of the secondary containment area will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the container storage area rinsate sample. The area will be decontaminated to meet FDEP's guidance at the time of closure. Safety-Kleen anticipates that proper maintenance of the concrete containment system will allow the slab to remain in place at closure.
- Safety-Kleen will proceed with demolition of the perimeter walls. If it is determined that soil contamination exists beneath the foundation slab, Safety-Kleen will demolish the entire concrete structure and complete a further delineation of the extent of soil contamination to be removed to complete closure. Any site assessment, interim measures, or corrective action that may be required will be conducted in accordance with Chapter 62-780, F.A.C. and permit requirements.

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

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

FACILITY CLOSURE SCHEDULE AND CERTIFICATION

- Safety-Kleen may amend the closure plan at any time during the active life of the facility. The active life of the facility is that period from initial receipt of hazardous waste to certification of final closure. Safety-Kleen will amend the plan any time changes in operating plans or facility design affect the closure plan or whenever a change occurs in the expected year of closure of the facility. The plan will be amended within 60 days of the changes.
- Safety-Kleen will notify the FDEP of its intent to close the facility in accordance with Chapter 62-730.240, F.A.C.
- Safety-Kleen will remove from the site all hazardous wastes in accordance with the approved closure plan. The Regional Administrator may approve a longer period if Safety-Kleen demonstrates that:
 1. The activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete; or
 2. The following requirements are met:
 - a) The facility has the capacity to receive additional wastes;
 - b) There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
 - c) Closure of the facility would be incompatible with continued operation of the site; and
 - d) Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen will complete closure activities in accordance with the approved closure plan within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, whichever is later. When closure is completed, all facility equipment and structures shall have been properly disposed of, or decontaminated by removing all hazardous waste and residues.
- Within 60 days of closure completion, Safety-Kleen will submit certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

Figure 10.3-1 presents a typical closure schedule anticipated for the Sanford facility.

CONTINGENT POST-CLOSURE PLAN

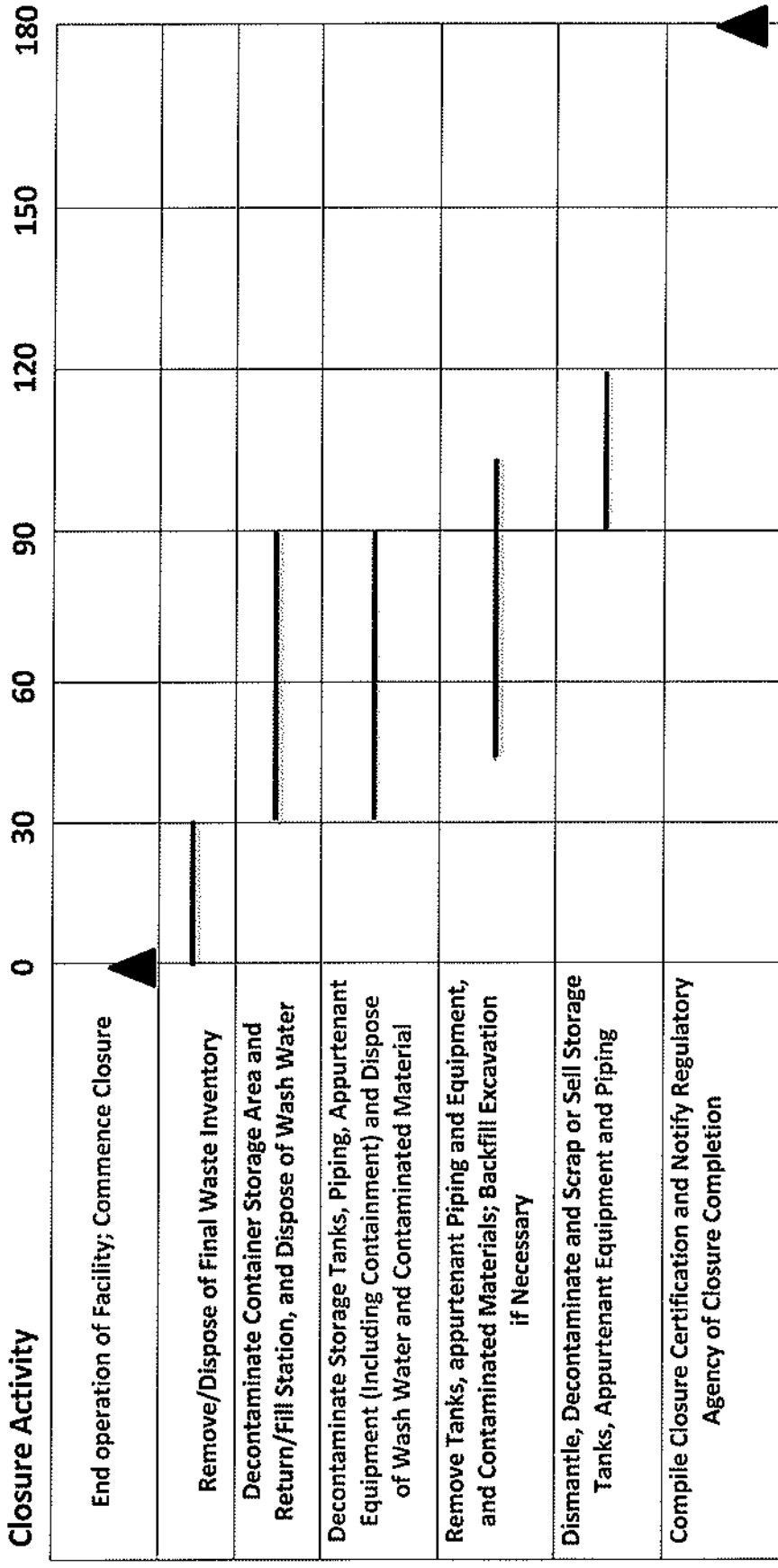
The tank system at the Sanford facility meets the secondary containment requirements of 40 CFR 264.193, and is, therefore, not required to have a contingent post-closure plan under 40 CFR 264.197(c). In addition, Safety-Kleen intends to remove or decontaminate all tank system components, associated containment systems, and contaminated soils (if any) at the time of closure. However, should future conditions indicate that all contaminated soils and tank system components cannot practicably be decontaminated or removed, then a plan to perform post-closure care in accordance with the post-closure care requirements that apply to landfills (40 CFR 264.310) will be prepared for implementation upon FDEP approval.

CLOSURE COST ESTIMATE

The cost for closure of the facility is estimated in the CCE worksheets and summarized as follows:

• Project Coordination and Scheduling	\$3,860
• Mobilize to Site and Prepare for Closure	\$54,309
• Storage Tank Decontamination and Removal	\$20,624
• Decontaminate Return/Fill Station	\$28,334
• Decontaminate Container Storage Area	\$8,849
• Containerize, Stage, Transport and Dispose of Decon Wastes	\$11,626
• Closure Certification Report	\$5,157
Subtotal	\$132,760
Location Factor for RS Means Rate	0.83
Total Closure Cost Estimate (Adjusted for Location)	\$110,191
15% Contingency	\$16,529
2013 Total Closure Cost Estimate	\$126,720

Figure 10.3-1
Typical Closure Schedule
Safety-Kleen Sanford



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3. On separate sheet(s) of paper, describe all data available on all prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring, for each unit noted in 1. above and also for each hazardous waste unit in your Part B application [40 CFR 270.14(d)(1)].

Provide the following information for each SWMU:

- a. Date of release.
 - b. Specifications of all wastes managed at the unit, to the extent available.
 - c. Quantity or volume of waste released.
 - d. Describe the nature of the release (i.e., spill, overflow, ruptured pipe or tank, etc.)
 - e. Location of the unit on the topographic map provided under 40 CFR 270.14(b)(19).
 - f. Designate the type of unit.
 - g. General dimensions and structural description (supply any available drawings).
 - h. Dates of operation.
4. On separate sheet(s) of paper, provide for each unit all analytical data that may be available which would describe the nature and extent of the environmental contamination that exists as a result of the prior releases described in 3. above. Focus on the concentrations of hazardous wastes or constituents present in contaminated soil or groundwater [40 CFR 270.14(d)(3)].

Part II

***P. #2 INFORMATION REQUIREMENTS REGARDING SOLID WASTE
MANAGEMENT UNITS***

SWMU-1(Container Storage Area Inside Service Center) is described within the permit application in section Part II B.

SWMU-2 (Tank Storage Area Inside Tank Farm Building) is described within the permit application in section Part II C.

SWMU-3 (Return and Fill Area) is described in Part II C.

SWMU-4 (Satellite Container Area (Inside SWMU-3)) is one 55-gallon container next to the wet dumpsters in the return/fill area.

SWMU-5 (Oily Water Tanker Trailer) is a 6,000 gallon tanker sitting in the back loading/unloading dock. This tanker is used for storage of material serviced by Safety-Kleen's Vacuum program.

SWMU-6 (Spent Mineral Spirits Tank (Inside SWMU-2)) is located within the tank farm and is described in Part II C.

SWMU-7 (Used Oil Tanks (Inside SWMU-2)) consists of two 20,000 gallon tanks for storage of used oil.

SWMU-8 (Used Antifreeze Tank) is a 12,000 gallon double-walled vertical above-ground storage tank immediately west of the tank farm.

SWMU-9 (Transfer Waste Storage Area) consists of the northwestern portion (Bay 1) of the return and fill area, and the southern portion of the container storage area.

SWMU-10 (Solid Waste Dumpster) is a municipal dumpster for solid wastes that is located immediately west of the used antifreeze tank.

SWMU-11 (Loading/Unloading Areas) are located as follows:

- 11a – Warehouse Dock – northwest corner of warehouse building
- 11b – Return/Fill Dock – northern portion of return and fill area
- 11c – Tank Farm Area – immediately north of tank farm

SWMU-12 (Mercury Lamps/Devices Storage Area (Inside SWMU-1)) is located along the northern wall of the container storage area in the warehouse building.

Part II P.3 Prior/Current Releases

Date	Material	Amt. (gallons)	Explanation
2/24/99	105 Solvent	30	Leaky drum on route truck in the north parking lot.
6/8/99	Perc	3	Drum tipped over in return/fill bay and spilled material into secondary containment
9/21/99	Compound Cleaning Liquid	5	Drum leaking in container storage area
2/8/01	Non-hazardous Waste Water	25	Drum leaking within containment area
8/10/01	Used Oil	20	3 rd party transporter blew a gasket seal while pumping oil in the tanker loading/unloading area.
7/16/09	Oily Water	30	Hose not secured properly and came loose during off-loading into oily water tanker trailer at back dock
8/13/09	Aqueous Cleaning Solution	15	While transferring material into a bin approximately 15 gallons spilled onto the return/fill bay floor
9/22/09	Antifreeze	15	Product antifreeze container punctured by forklift in the warehouse building spilling material into the containment trench.
12/28/09	Used Oil	1	Coupler came loose while off-loading and sprayed about 1 gallon of used oil onto the tank farm pad
2/21/11	Oily Water	5	Hose connection came loose while off-loading into the tanker trailer back dock containment area
3/13/12	Diesel Fuel	0.5	Fuel line under oil truck failed while off-loading on the tank farm pad
11/15/12	Used Oil	30	Connection failed at the valve due to the hose coupler not being secured and spilled 30 gallons of used oil onto the tank farm pad
4/16/13	Used Oil	10	Hose split while off-loading into used oil tank spilling 10 gallons of used oil onto tank farm pad.

Part II

Q. INFORMATION REQUIREMENTS FOR SOLID WASTE MANAGEMENT UNITS

Part II.Q. of the Florida Department of Environmental Protection's (FDEP's) Application for a Hazardous Waste Permit outlines the information requirements for solid waste management units (SWMU's) at the facility. This section provides the required information.

A RCRA Facility Assessment Report, dated June 24, 1991, was completed by the Florida Department of Environmental Protection for the Safety-Kleen Sanford facility. In this report two SWMU's were identified. These SWMU's are listed in the current operating permit (22198-HO-005) in Appendix A. Ten additional SWMU's have been identified in this current permit renewal application. These additional units have been identified after review of previous Safety-Kleen permit renewals due to the similarity of operations at the facilities. The complete list of SWMU's is found on the next page.

SWMU NUMBER	DESCRIPTION
1	Container Storage Area Inside Service Center
2	Tank Storage Area Inside Tank Farm Building
3	Return and Fill Area
4	Satellite Container Area (Inside SWMU-3)
5	Oily Water Tanker Trailer
6	Spent Mineral Spirits Tank
7	Used Oil Tanks
8	Used Antifreeze Tank
9	Transfer Waste Storage Area
10	Solid Waste Dumpster
11	Loading/Unloading Areas
11a	Warehouse Dock
11b	Return/Fill Dock
11c	Tank Farm Area
12	Mercury Lamps/Devices Storage Area (Inside SWMU-1)



Part II

S. AIR EMISSION STANDARDS

AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

The requirements of 40 CFR 264 Subpart BB – Air Emission Standards for Equipment Leaks apply to certain equipment associated with the used parts washer solvent storage tanks system. Figure 2.2-6 plots the facility layout with the locations of the hazardous waste management units. Equipment subject to Subpart BB requirements is included in the “above ground storage tanks” shown in Figure 2.2-6. This equipment contains or contacts hazardous wastes with VOC concentrations > 10% by weight. The Subpart BB requirements apply to pumps, valves, flanges, etc., which are part of the used parts washer solvent storage tank system. Figure 11.1-1 shows the specific equipment items, which are considered to be in “heavy liquid service” for the purposes of Subpart BB. Compliance with the applicable sections of 40 CFR 264.1052 thru 1063 has been achieved by the implementation of the procedures outlined in Appendix D and other procedures detailed below.

Implementation Schedule

All facilities subject to these regulations were required to be in compliance by the date specified in the final rule.

Schedule and Procedures For Inspections

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

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

Alternate Control Devices

No alternate control devices are in use at this facility.

Documentation Of Compliance

Pumps in Light Liquid Service (40 CFR 264.1052)

Safety-Kleen manages parts washer solvent (mineral spirits) that has vapor pressure less than 0.3 kilopascals at 20 degrees C. Therefore pursuant to 40 CFR 264.1030, these materials are classified as heavy liquids. The existing pumps that manage hazardous wastes at the Sanford facility are identified and listed for use in heavy liquid service. Therefore, the Sanford facility does not have any pumps that are in light liquid service subject to the requirements of 40 CFR 264.1052.

Compressors (40 CFR 264.1053)

The facility does not have any compressors that are in contact with organic chemicals. Therefore, 40 CFR 264.1053 is not applicable.

Pressure Relief in Gas/Vapor Service (40 CFR 264.1054)

The facility does not have any pressure relief subject to the requirements of 40 CFR 264.1054.

Sampling Connecting Systems (40 CFR 264.1055)

The facility does not have any sampling connecting systems or in situ sampling systems.

Open-Ended Valves or Lines (40 CFR 264.1056)

Safety-Kleen has identified the location of each open-ended valve and line and included it in the inspection record. The open-ended valves and lines that are subject to the requirements of 40 CFR 264.1056 are identified in the facility's environmental piping schematic drawing (Figure 11.1-1). This equipment is either equipped with caps, second valves, or double block and bleed system. A cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring hazardous waste stream flow through the open-ended valve or line. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the hazardous waste stream end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves.

Valves in Gas/Vapor Service or in Light Liquid Service (264.1057)

All existing valves that come in contact with hazardous wastes are in heavy liquid service. Therefore, they are not subject to the requirements of 40 CFR 264.1057. If their use is changed to light liquid service, the valves will be monitored for leaks using a portable organic vapor analyzer in accordance with Method 21.

Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and Other Connectors (40 CFR 264.1058)

At the present time, the pumps, valves, flanges, and other connectors at the Sanford facility are used for heavy liquid service. As defined in 40 CFR 264.1031, the mineral spirits solvents managed at the facility are considered to be heavy liquid because the solvents have a vapor pressure less than 0.3 kilopascals at 20° C. Furthermore, no single contaminant is present in the wastes that has vapor pressure greater than 0.3 kilopascals in concentrations in excess of 20% by weight. In addition, the wastes presently managed in the equipment at the Sanford facility have a maximum of 2,000 ppm concentration in the vapor phase. Therefore, a portable organic vapor analyzer will not detect leaks at 10,000 ppm and a leak will be observed based on a visible liquid leak rather than by a portable organic analyzer. The first attempt at repair will be made no later than five calendar days after each leak is detected. Pursuant to the requirements of 40 CFR 264.1058, if a visual leak is observed, the affected equipment will be repaired no later than 15 days after it is detected. Whenever a leak is detected as specified in 40 CFR 264.1064 the following will apply:

- A weatherproof and readily visible identification attached to the leaking equipment shall be marked with the following information: equipment identification number, date that evidence of a potential leak was found in accordance with 264.1058(a), and date leak was detected.
- The identification on equipment, except on a valve, may be removed after it has been repaired.
- The identification on a valve may be removed after it has been monitored for two successive months as specified in 264.1057(c) and no leak has been detected during those two months.

Whenever a leak is detected as specified in 40 CFR 264.1058, the following information shall be recorded, as deemed appropriate, in an inspection log and shall be kept as part of the facility operating record:

- The instrument, operator, and equipment ID numbers.
- The date that evidence of a potential leak was found in accordance with 264.1058(a).
- The date the leak was detected and the dates of each attempt to repair the leak.
- Repair methods applied in each attempt to repair the leak.
- “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
- Documentation supporting the delay of repair of a valve in compliance with 264.1059(c).
- The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a hazardous waste management unit shutdown.
- The expected date of successful repair of the leak, if the leak is not repaired within 15 calendar days.
- The date of successful repair of the leak.

Recordkeeping Requirements

Pursuant to the requirements of 40 CFR 264.1064, Safety-Kleen has identified all affected equipment by number and location (Equipment Schedule) as shown in Figure 11.1-1.

The following records will be maintained at the Sanford Branch and maintained as part of the facility’s operating record.

- Type of equipment; valve, pump, flange, etc.
- Service; light liquid or heavy liquid.
- Percent-by-weight is not necessary for the equipment because the facility manages wastes that are nearly 100% organic by weight.
- Method of compliance; daily inspections.
- ID on the equipment, if they are found leaking, will be implemented.
- Leak monitoring results and any repairs conducted at the facility.

Closed-Vent Systems and Control Devices (40 CFR 264.1060)

Since neither a closed vent system nor a control device is required for, or as part of, the equipment ancillary to the facility's hazardous waste storage tank (equipment subject to Subpart BB), demonstrations of compliance with applicable design, operation and maintenance specifications are not required. The Sanford facility will maintain records as part of the facility's operating record that indicate the name and ID of each equipment (i.e., pumps, valves, flanges, open-ended valves, etc.) at the facility. The record will include the type of chemicals managed in each equipment (i.e., light liquid, heavy liquid, etc.) and the state of the chemicals (i.e., gas, vapor, liquid, etc.) and any leaks detected (i.e., visual, >10,000 ppm, etc.) and the date and type of repair performed to repair the leaking equipment. Since Safety-Kleen manages organic chemicals that are nearly 100% by weight organic, it is not required to maintain in the records the concentration of organic chemicals in the waste stream (40 CFR 264.1064(b)(1)(iv)).

AIR EMISSION STANDARDS FOR TANKS, AND CONTAINERS

Safety-Kleen's Sanford facility manages wastes that range in Volatile Organic concentrations up to 100%. Therefore, all wastes managed in containers and in storage tanks are handled as being subject to 40 CFR 264 Subpart CC requirements based on the knowledge of the wastes managed at the facility. Therefore, no analytical waste determination is required.

Subpart CC Tank Standards (40 CFR 265.1084)

The Safety-Kleen Sanford facility manages hazardous wastes in a tank system that consists of one 15,000-gallon storage tank. The tank in this system is subject to Subpart CC requirements as a Level 1 Tank based on tank dimensions and maximum vapor pressure of volatile organic materials managed in this tank (see following table). A list of tank, tank dimensions and maximum vapor pressure of volatile organics managed in tanks subject to Level 1 Tank controls is provided in the following table.

Applicability of Standards Level 1 Tanks

Tank Capacity	Maximum Vapor Pressure
> 151 cubic meters (39800 gallons)	< 5.2 kPa (0.76 psia)
> 19800 gallons < 39800 gallons	27.6 kPa (4.05 psia)
< 19800 gallons	76.6 kPa (11.26 psia)

Tanks that meet the above size and vapor pressure limits and that are not heated to a temperature that would increase the vapor pressure of the materials above these limits are required to meet Level 1 Tank Standards. See Table 11.2-1 for a summary of the tank at the Sanford facility subject to the requirements of Subpart CC, and the applicable controls.

Level 1 Tank Requirements (40 CFR 264.1084(c))

Safety-Kleen spent parts washer solvent has a vapor pressure of less than 0.3 kilopascals at 20° C. The tank used for storing this waste has a capacity of 20,000 gallons. A complete description of the tank system is found in Part II C. Waste material stored in these tanks is spent Safety-Kleen Premium Gold 150 Solvent. The storage tanks meeting Level 1 requirements are equipped with fixed roofs with the following specifications:

- The fixed roof and its closure devices form a continuous barrier over the entire surface area of the hazardous waste in the tank.
- There are no visible cracks, holes, gaps, or other open spaces between roof section and the tank wall.
- Each opening in the fixed roof is equipped with a closure device designed to operate such that when the closure device is secured in closed position, there are no visible cracks, holes, gap, or other open spaces in the closure device or between the perimeter of the opening and the closure device or connected to a control device (control is not required for Level 1 Tanks).

Inspection Requirements for Level 1 Tanks are as follows:

The fixed roof and its closure devices are visually inspected to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes or gaps in the roof sections; broken, cracked, or damaged seals or gaskets on closure devices; broken or missing hatches, access covers, caps, or other closure devices. A description of inspections and example log for tanks can be found in Part II C.

The most recent tank assessment was completed on May 21, 2013 and is included in this permit application.

Level 2 Tanks (40 CFR 265.1084(d))

There are no level 2 tanks at this facility.

Subpart CC Container Standards (40 CFR 264.1086)

This section is applicable to containers that are greater than 26 gallons that are used to manage hazardous wastes with greater than 500 ppm volatile organic contents. Hazardous waste containers that are filled (generated) at the facility as well as hazardous waste containers that are received from off site are subject to this rule. Table 11.2-2 provides a summary of the areas, and types of containers managed, at the Sanford facility for which Subpart CC is applicable.

Level 1 Containers (40 CFR 265.1086(c))

Containers greater than 26 gallons but less than 119 gallons and containers greater than 119 gallons used in heavy material service (<0.038 psia) are to be-controlled in accordance with one of the following Level 1 container standards as follows:

- Containers that meet DOT standards are in compliance with Subpart CC Level 1 container design standards. Safety-Kleen drums meet DOT's standards; or
- A container equipped with cover and closure devices that form a continuous barrier over the container openings such that when the cover and closure devices are secured in the closed position there are no visible holes, gaps, or other open spaces into the interior of the container. The cover may be a separate cover installed on the container such as a lid on a drum or a tarp on a roll-off box; or
- An open-top container in which an organic-vapor-suppressing barrier is placed on or over the hazardous waste in the container such that no hazardous waste is exposed to the atmosphere.

Level 1 Container Operating Requirements (40 CFR 264.1086(c)(3))

Whenever a hazardous waste is in a container using Level 1 controls, the covers shall be maintained in closed position except as follows:

- Adding hazardous waste or other materials to the container if the container is filled in one continuous operation, the container is closed upon conclusion of the filling operation. In the case of discrete or batch filling the container is to be closed:
 - a) upon filling the container to the intended final level;
 - b) the completion of a batch loading after which no additional waste will be added within 15 minutes;
 - c) the person performing the loading operation leaving the immediate vicinity of the container; or
 - d) the shutdown of the process generating waste being added to the container.

- Removing hazardous waste from the container:
When discrete quantities of hazardous waste are removed from the container, covers shall be promptly secured upon completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container. RCRA empty containers may be open to the atmosphere at any time.
- Sampling wastes, measuring depth or quantity of wastes:
Containers may be opened when sampling and/or measuring hazardous wastes, as well as adding or removing hazardous wastes from them. Covers must be replaced and secured on containers once such activities are completed.

Level 1 Container Inspection Requirements

All Level 1 Containers that are not emptied upon receipt at the facility, are inspected upon arrival and each day thereafter until the container is transferred to a recycle center. Each Level 1 Container and its cover and closure devices are inspected for visible cracks, holes, gaps, or other open spaces. No container remains at the facility over 1 year. If a defect is detected for a container, cover, or closure devices, a repair shall be attempted within 24 hours after detection, and repair shall be completed as soon as possible, but no later than 5 calendar days. The container will be over-packed in a DOT approved container as a means of repair. A description of the types of inspections and example logs for containers can be found in Part II B.

Level 2 Containers (264.1086(d))

Hazardous waste containers with design capacity greater than 119 gallons and that are in light material service are subject to Level 2 container standards. These include totes, roll-off boxes that are greater than 119 gallons in capacity, and bulk tankers and rail car tankers. Level 2 containers are not stored at this facility, therefore 40 CFR 264.1087(d) does not apply at this location. However, these types of containers may undergo 10-day transfer at the facility, but since they will be considered “still in the course of transportation” Subpart CC will not be applicable.

Documentation of Compliance

Safety-Kleen prepared a written compliance plan for those units subject to Subpart CC, and instituted the plan on December 6, 1996. A copy of Subpart CC Compliance Plan is included in Appendix D.

FIGURE 11.1-1
PIPING SCHEMATICS
40 CFR 264, SUBPART BB EQUIPMENT LIST
SAFETY-KLEEN SYSTEMS, INC.
SANFORD, FLORIDA

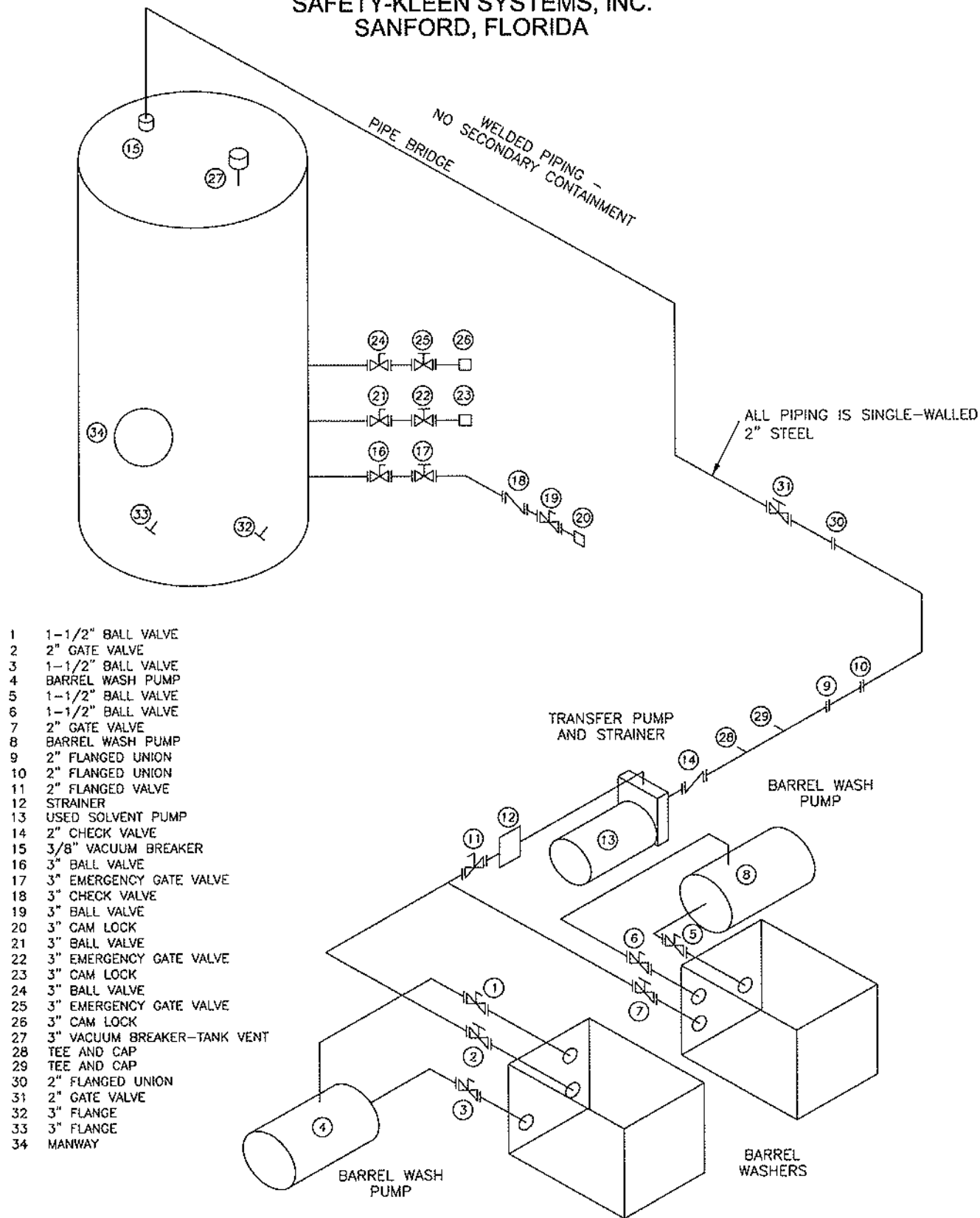


Figure 11.1-2
Safety-Kleen Sanford, Florida
Daily Inspection of Tank Equipment

INSPECTORS NAME/TITLE:

INSPECTORS SIGNATURE				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE (MM/DD/YY)

TIME

Pump, Flange, or Valve Number	MON	TUES	WED	THURS	FRI
1. 3" Camlock Coupling	A N	A N	A N	A N	A N
2. 3" Gate Valve	A N	A N	A N	A N	A N
3. 3" Check Valve	A N	A N	A N	A N	A N
4. 3" Gate Valve	A N	A N	A N	A N	A N
5. 3" Emergency Valve	A N	A N	A N	A N	A N
6. Manway	A N	A N	A N	A N	A N
7. 2" Check Valve	A N	A N	A N	A N	A N
8. Waste Mineral Spirits Pump	A N	A N	A N	A N	A N
9. Filter Basket	A N	A N	A N	A N	A N
11. 2" Ball Valve	A N	A N	A N	A N	A N
12. 2" Ball Valve	A N	A N	A N	A N	A N
13. 2" Ball Valve	A N	A N	A N	A N	A N
14. 2" Ball Valve	A N	A N	A N	A N	A N
15. Waste Mineral Spirits Pump	A N	A N	A N	A N	A N
16. 1" Ball Valve on Catch Pan	A N	A N	A N	A N	A N
17. Waste Mineral Spirits Pump	A N	A N	A N	A N	A N
18. 2" Ball Valve	A N	A N	A N	A N	A N
19. 2" Ball Valve	A N	A N	A N	A N	A N
20. 2" Ball Valve	A N	A N	A N	A N	A N
21. 2" Ball Valve	A N	A N	A N	A N	A N
22. 1" Ball Valve on Catch Pan	A N	A N	A N	A N	A N

If "N" enter pump or valve # _____ and circle appropriate problem: potential leak, active leak, sticking, wear, does not operate smoothly, or other: _____

For all leaks and potential leaks, the Leak Detection and Repair Record (Figure 11.1-3) must be completed.

A = Acceptable N = Not Acceptable

TABLE 11.2-1
SUMMARY OF TANK MANAGEMENT UNITS SUBJECTED TO SUBPART CC
SAFETY-KLEEN SYSTEMS, INC. SANFORD, FL
EPA ID NUMBER: FLD 984 171 165

Hazardous Waste Management Unit	Location of Hazardous Waste Management Unit	EPA Hazardous Waste Codes Managed	Brief Waste Description	Average Volatile Organic Concentration of Hazardous Waste	Subpart CC Status	Control Option (See Table 11.2-3)
Waste Parts Washer Solvent Tank (15,000 g)	See Figure 2.1-6	D001, and codes listed in Note 1 below	Waste Parts Washer Solvent (Petroleum Naptha)	> 500	Level 1 Control	1

NOTE: D018, D039, D040

TABLE 11.2-2
SUMMARY OF CONTAINER MANAGEMENT UNITS SUBJECTED TO SUBPART CC
SAFETY-KLEEN SYSTEMS, INC. SANFORD, FL
EPA ID NUMBER: FLD 984 171 165

Hazardous Waste Management Unit	Location of Hazardous Waste Unit	EPA Hazardous Waste Codes Managed	Brief Waste Description	Average Volatile Organic Concentration of Hazardous Waste	Container Type	Subpart CC Status	Control Option (See Table 11.2-3)
Container Storage Area Paint Waste Shelter	See Figure 2.1-6	D001, F001, F002, F003, F005 and codes listed in Note 1 below	Waste Parts Washer Solvent (Petroleum Naptha), Dry Cleaner Wastes	> 500	Type A	Container Level 1 Controls per 264.1086(c)	11
Return and Fill Area	See Figure 2.1-6	D001 and codes listed in Note below	Waste Parts Washer Solvent (Petroleum Naptha)	> 500	Type A	Container Level 1 Controls per 264.1086(c)	11

Note: D004 thru D011, D018, D019, D021 thru D030, and D032 thru D043

Table 11.2-3

Subpart CC Control Options

Tanks

1. These tanks shall comply with Tank Level 1 controls which require tanks to have a fixed roof with no visible cracks, holes, gaps, or other spaces in accordance with 40 CFR 264.1084(c). The tank shall be visually inspected for defects prior to the tank becoming subject to these requirements and at least once a year thereafter [40 CFR 264.1084(c)].
2. These tanks are fixed roof tanks equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(e). The internal floating roof shall be visually inspected for defects at least once every twelve months after initial fill unless complying with the alternative inspection procedures in 40 CFR 264.1084(e)(3)(iii). [40 CFR 264.1084.(d)(1)]
3. These tanks are equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(f). The external roof seal gaps shall be measured in accordance with procedures contained in 40 CFR 264.1084(f)(3)(I) within 60 days and at least once every 5 years thereafter. The external floating roof shall be visually inspected for defects at least once every 12 months after initial fill. [40 CFR 264.1084(d)(2)]
4. These tanks are vented through a closed-vent system to control device and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(g). The tank shall be equipped with a fixed roof and closure devices which shall be visually inspected for defects initially and at least once every year. The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 264.1087. [40 CFR 264.1084(d)(3)]
5. These tanks are pressure tanks which shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(h). [40 CFR 264.1084(d)(4)]
6. These tanks are located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(i). The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 264.1087 [40 CFR 264.1084(d)(5)]
7. These tanks have covers which have been specified as "unsafe to inspect and monitor" and shall comply with the requirements of 40 CFR 264.1084(j)(1) [40 CFR 264.1084(f) & (g)]

Table 11.2-3

Subpart CC Control Options

Containers

8. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and meet the applicable US DOT regulations under the Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1) & (c)(1)(i)]
9. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(i) & (c)(1)(i)]
10. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and are open-top containers in which an organic-vapor surpressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(i) & (c)(1)(iii)]
11. These containers have a design capacity greater than 0.46 m³, are not in light material service and meet the applicable US DOT regulations under Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(i)]
12. These containers have a design capacity greater than 0.46 m³, are not in light material service and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(ii)]
13. These containers have a design capacity greater than 0.46 m³, are not in light material service and are open-top containers in which an organic-vapor surpressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(iii)]
14. These containers have a design capacity greater than 0.46 m³, are in light material service and meet the applicable US DOT regulations under Container Level 2 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(iii) & (d)(1)(i)]

Table 11.2-3

Subpart CC Control Options

15. These containers have a design capacity greater than 0.46 m³, are in light material service and operate with no detectable organic emissions as defined in 40 CFR 265.1081. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1088(b)(1)(iii) & (d)(1)(ii)]
16. These containers have a design capacity greater than 0.46 m³, are in light material service and that have been demonstrated within the preceding 12 months to be vapor tight using 40 CFR Part 60, Appendix A, Method 27. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1088(b)(1)(ii) & (c)(1)(i)]
17. These containers have a design capacity greater than 0.1 m³ that are used for treatment of a hazardous waste by a waste stabilization process and are vented directly through a closed-vent system to a control device in accordance with 40 CFR 264.1086(e)(2)(ii). The closed-vent system and control devices shall be inspected and monitored as specified in 40 CFR 264.1087. [40 CFR 264.1088(b)(2) & (e)(1)(i)]
18. These containers have a design capacity greater than 0.1 m³ that are used for treatment of a hazardous waste by a waste stabilization process and are vented inside an enclosure which is exhausted through a closed-vent system to a control device in accordance with 40 CFR 264.1086(a)(2)(i) & (ii).). The closed-vent system and control devices shall be inspected and monitored as specified in 40 CFR 264.1087. [40 CFR 264.1088(b)(2) & (e)(1)(ii)]

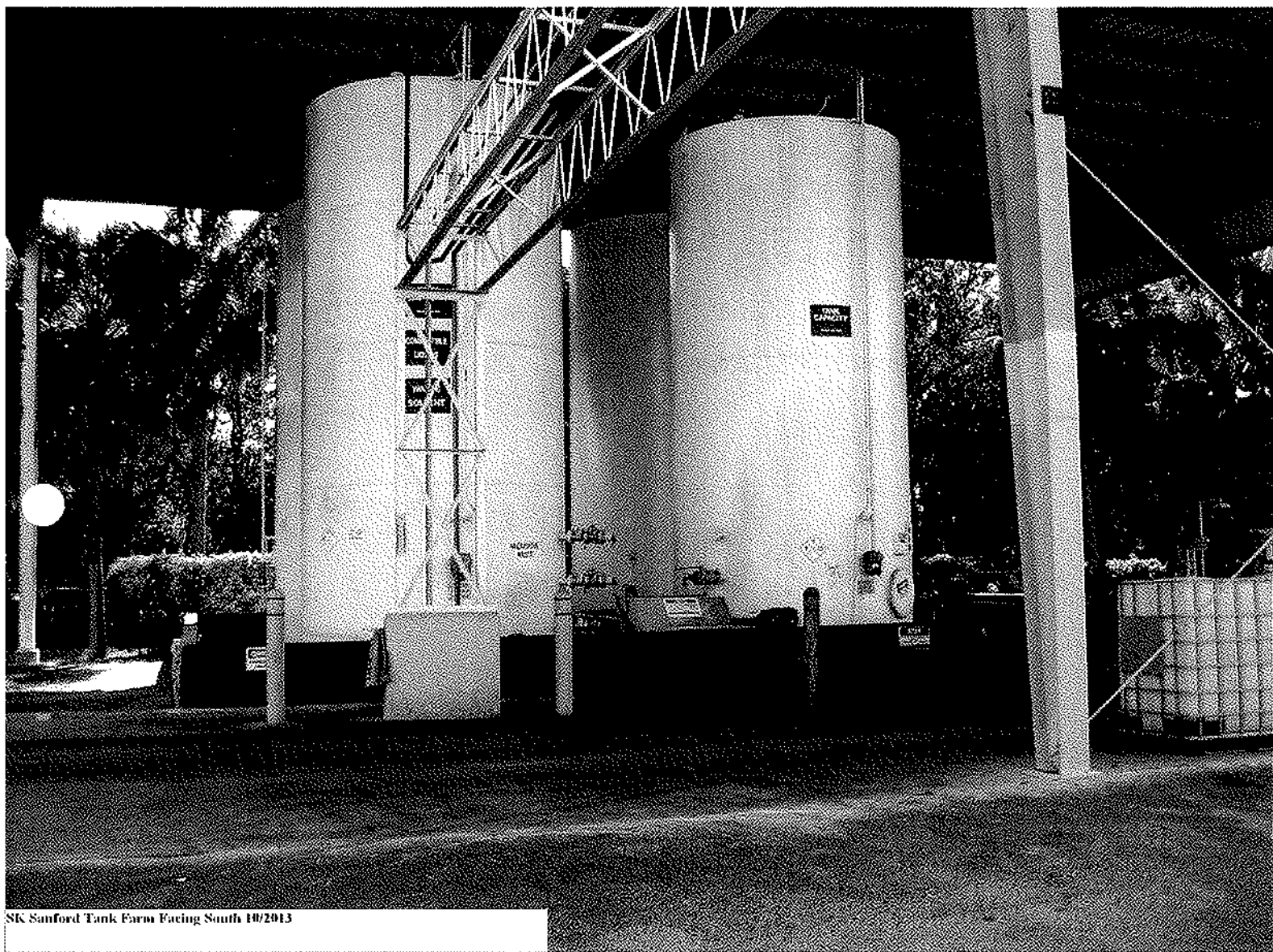
Appendix A
Site Photographs



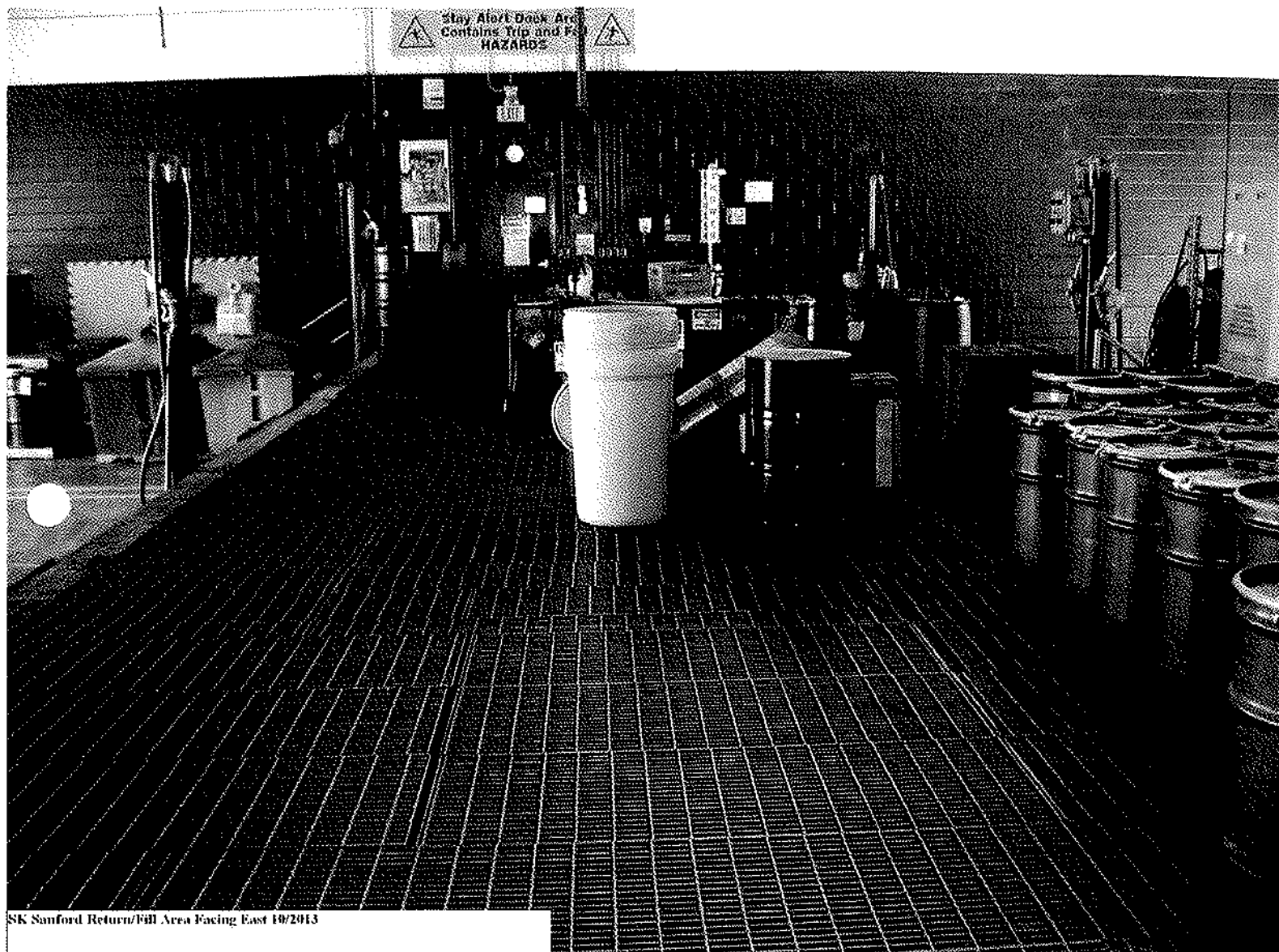
SK Sanford Front Building 10/2013



SK Sanford Container Storage Area Facing West 10/2013



SK Sanford Tank Farm Facing South 10/2013



SK Sanford Return/Fill Area Facing East 10/2013



SK Sanford Satellite Container in Return/FBI Area 10/2013



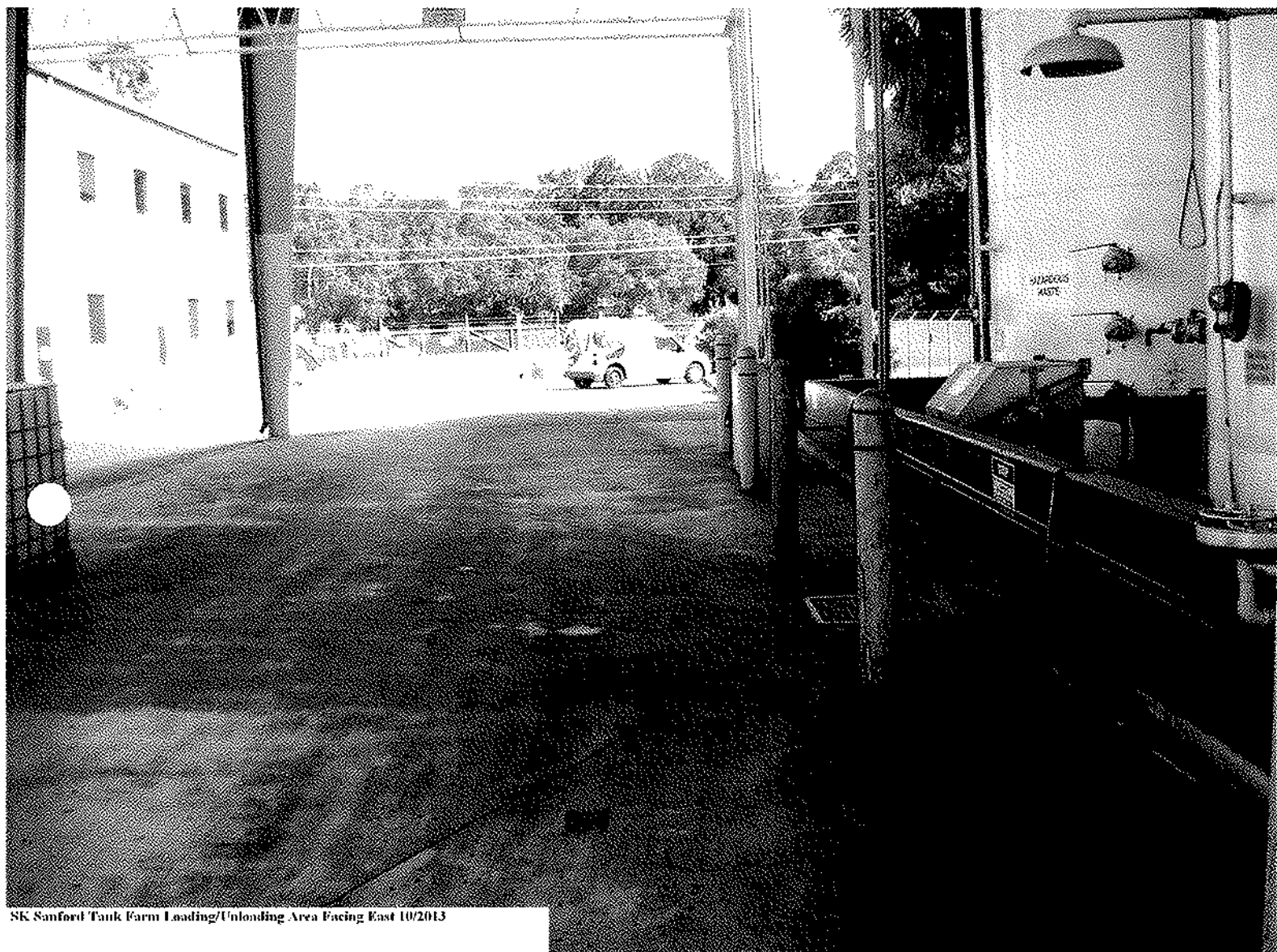
SK Sanford Oily Water Tanker Facing Southeast 10/2013



SK Sanford Used Antifreeze Tank Facing Southeast 10/2013



SK Sanford Solid Waste Dumpster Facing South 10/2013



SK Sanford Tank Farm Loading/Unloading Area Facing East 10/2013



SK Sanford Mercury Lamps/Devices Storage Area 10/2013

Appendix B
Chemical Analysis Reports
Annual Re-Characterization

Appendix B Chemical Analysis Information

The Safety-Kleen Annual Re-characterization chemical analysis data was submitted with the 2013 Orange Park permit renewal application. Therefore, it is not being submitted with this renewal application as the Department has the current data.

Appendix C
Tank Integrity Inspection Report

**SAFETY KLEEN
SANFORD, FLORIDA**

OUT-OF-SERVICE INSPECTION

TANK 001

An Out-of-Service Inspection was performed on Tank 001 located at the Safety Kleen facility in Sanford, Florida, on September 17, 2013. This tank was originally built to the UL Standard 142. This inspection met or exceeded the minimum requirements set by the Steel Tank Institute Standard for Shop Fabricated Aboveground Storage Tanks SP001-5. Following is a detailed report of the inspection, including findings and recommendations.

Configuration: Vertical

Product: Waste Solvent

Installed: 1991

Capacity: 20,000 Gallons

Foundation: Carbon Steel/Concrete Pad

Height: 25 Feet 11 Inches

Containment: Concrete

Diameter: 12 Feet

Shell/Roof: Carbon Steel-Butt Welded



Inspected By: Frank Omoregbee
API 653 Certification Number: 42391

Mott Tank Inspection, Inc.
PO Box 394
Clarks Summit, PA 18411

The information contained within this report is based on a thorough general inspection of the entire structure, including all appurtenances, as well as piping to and from the tank up to, yet exclusive of, the nearest valve. The methods used to acquire the information, as well as compile and analyze the data in this report, are the most current and widely accepted methods in the industry. This report and all of its contents are in no way a guarantee of the integrity of the structure, nor does it ensure that the tank will not leak or completely fail. Mott Tank Inspection, Inc. accepts no responsibility or liability, under any circumstances, for the failure of this tank or any ensuing environmental clean up. The recommendations included in this report are merely guidelines for attaining the highest level of spill prevention and facility safety. Repairs above and beyond those suggested here may be necessary upon commencement of recommended repairs and further inspection. Any professional opinion indicating time for the suitable storage of the product in this tank is an estimate of the maximum allowable time span before re-inspection is required. This estimate is the best judgment of a certified tank inspector; however, it does not guarantee that the tank will not leak during the allotted time.

OUT-OF-SERVICE INSPECTION RESULTS

The field checklist utilized during the inspection was modeled after the Steel Tank Institute Standard for Shop Fabricated Aboveground Storage Tanks. Results of the inspection are summarized below.

CONTAINMENT AREA

The concrete containment area was covered with an epoxy liner. The containment area and liner were in satisfactory condition.

FOUNDATION

The tank was supported by an insulated carbon steel skirt that was anchored to a concrete pad. No deficiencies were observed.

TANK

The tank did not have any indications of distortion or weakness.

The coating on the shell was in satisfactory condition.

The roof was in satisfactory condition.

The roof angle was in satisfactory condition. Ultrasonic thickness measurements ranged from 0.245 inch to 0.249 inch.

There was an area of clustered pitting on the center of the interior tank bottom located beneath the automatic tank gauge float. The pitting ranged from 0.070 inch to 0.090 inch in depth. The area was marked for repair. It is recommended to install a patch plate and perform NDE testing after installation.

Ultrasonic thickness measurements taken on the shell, roof, and floor were uniform and satisfactory.

APPURTENANCES

The nozzles were clean and dry with no indications of seepage.

The coating on the nozzles was in satisfactory condition.

The high level alarm was in satisfactory operational condition.

The tank was equipped with normal and emergency ventilation.

The automatic tank gauge was in satisfactory operational condition.

COMPLIANCE DEFICIENCIES

There was an area of clustered pitting on the interior tank bottom located beneath the automatic tank gauge float of up to 0.090 inch in depth.

COMPLIANCE RECOMMENDATIONS

Repair the area of pitting marked for repair on the floor.

RESULTS

It is the professional opinion of this inspector that the area of pitting on the floor should be repaired before returning the tank to service.

NEXT INSPECTION

The next inspection should be determined after repair to the floor is completed.

REMAINING THICKNESS CALCULATIONS

$$t_{act} - t_{min} = C_a = \text{Remaining Corrosion Allowance (inches)}$$

$$t_{prev} - t_{act} / Y = C_r = \text{Corrosion Rate (inches per year)}$$

$$C_a / C_r = R_L = \text{Remaining Life (years)}$$

Where:

- C_a = Remaining corrosion allowance of the shell course under consideration, in inches.
- C_r = Corrosion rate of the shell course under consideration, in inches per year.
- t_{act} = Minimum thickness measurement of the shell course under consideration, as recorded at the time of inspection, in inches.
- t_{min} = Minimum required thickness of shell course, at the maximum allowable fill height.
- t_{prev} = Previous thickness measurement of shell course under consideration as recorded at last inspection, or nominal thickness if no previous thickness measurements, in inches.
- R_L = Estimated remaining life of the shell course under consideration, in years.
- Y = Time span between thickness readings or age of the tank if nominal thickness is used for t_{prev} , in years.

Tank Age 22 years

Course	t_{prev}	t_{act}	t_{min}	% remaining	C_a	C_r	R_L
1	0.250	0.240	0.125	96.00%	0.115	0.00045	253
2	0.250	0.248	0.125	99.20%	0.123	0.00009	1353
3	0.250	0.242	0.125	96.80%	0.117	0.00036	322
4	0.188	0.184	0.094	97.87%	0.090	0.00018	495
Roof	0.188	0.180	0.094	95.74%	0.086	0.00036	237

Tank Age 22 years

Floor	t_{prev}	t_{act}	t_{min}	% remaining	C_a	C_r	R_L
Before Repairs	0.250	0.160	0.125	64.00%	0.035	0.00409	9
After Repairs	0.250	0.222	0.125	88.80%	0.097	0.00127	76

NOZZLE MINIMUM THICKNESS DETERMINATION

The following pipe/nozzle minimum thicknesses are based on the current in-house engineering standards, which take into consideration pressures, structural integrity, and localized corrosion allowance.

Tank Age 22 years

Nozzle	t_{prev}	t_{act}	t_{min}	C_a	C_r	R_L
A	0.300	0.264	0.070	0.194	0.00164	119
B	0.300	0.265	0.070	0.195	0.00159	123
C	0.300	0.275	0.070	0.205	0.00114	180
D	0.300	0.264	0.070	0.194	0.00164	119
E	0.300	0.268	0.070	0.198	0.00145	136
F	0.250	0.225	0.130	0.095	0.00114	84

INSPECTION DATA

An Olympus® Ultrasonic Meter (serial number: 54236804 DL Plus) was used to determine inspection data. Ultrasonic thickness measurements are provided in inches.

Thickness measurements were taken on the first course (chime area), at three (3) inches from the bottom and on each course for drop requirements.

TANK THICKNESS MEASUREMENTS

Shell Chime Area

0.248	0.246	0.245	0.242	0.240
0.244	0.247	0.244		

MEAN	MINIMUM
0.245	0.240

Course 1	0.249	0.246	0.248	0.252	0.250
Course 2	0.250	0.254	0.252	0.248	0.251
Course 3	0.246	0.248	0.244	0.242	0.245
Course 4	0.187	0.188	0.190	0.188	0.184

MINIMUM	MEAN
0.184	0.233

Roof	0.182	0.187	0.183	0.188	0.186
	0.185	0.180	0.184	0.182	0.180
	0.181				

MINIMUM	MEAN
0.180	0.183

Floor	0.252	0.244	0.238	0.236	0.235
	0.239	0.243	0.253	0.243	0.240
	0.222	0.238	0.248	0.255	

MINIMUM	MEAN
0.222	0.242

NOZZLE THICKNESS MEASUREMENTS

Nozzle ID	Nozzle Size	Service	Nozzle Thickness Measurements			
	Inches		T	B	R	L
A	3	Blank	0.264	0.278	0.270	0.274
B	3	Blank	0.288	0.274	0.271	0.265
C	3	Product	0.291	0.282	0.275	0.286
D	3	Blank	0.272	0.264	0.275	0.270
E	3	Blank	0.281	0.280	0.292	0.268
F	24	Manway	0.225	0.236	0.231	0.238

APPENDIX A

Engineering Drawings

The tank layout includes:

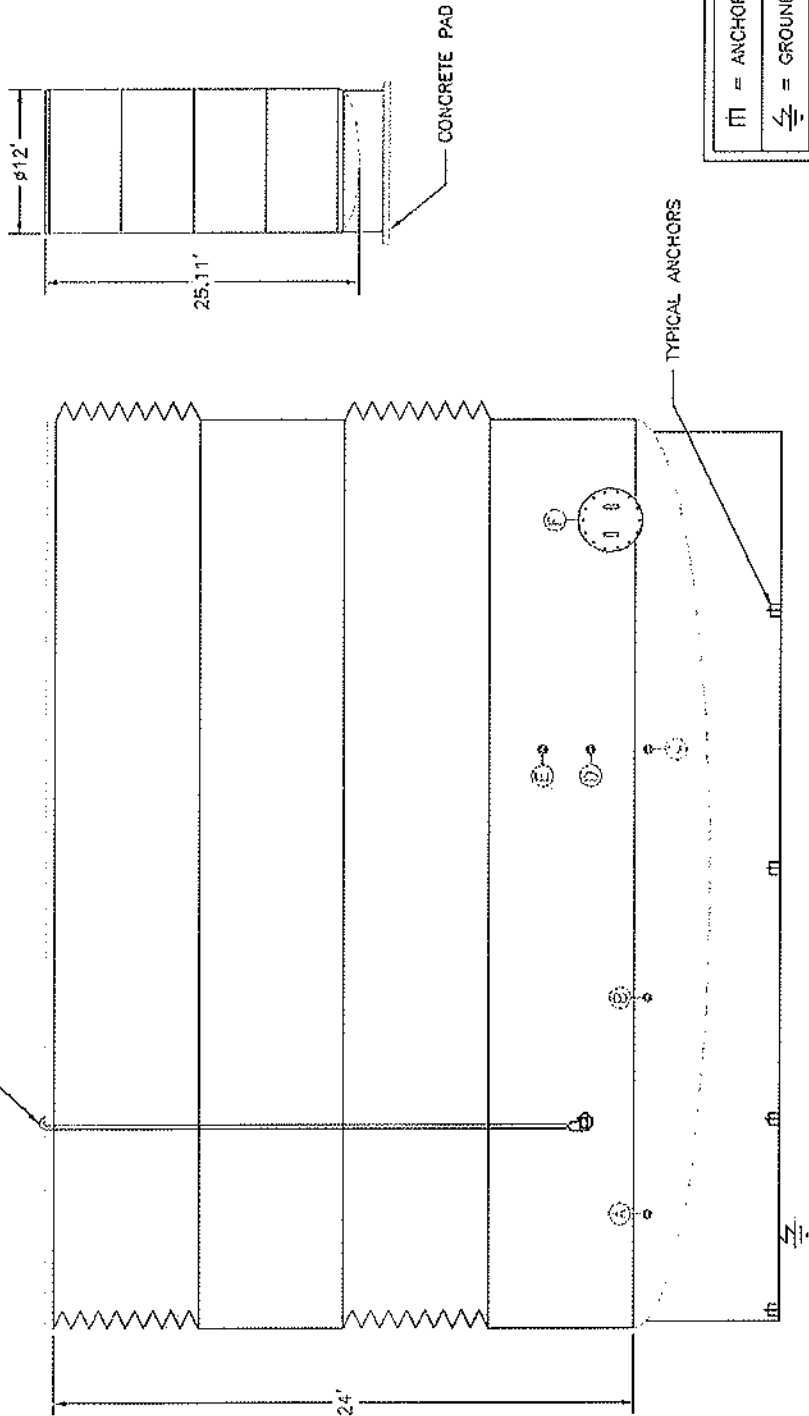
- Shell Layout
- Shell Appurtenances
- Roof Layout
- Roof Appurtenances
- Floor Layout

SHELL LAYOUT

TANK# 001

NOTES:
1) SHELL VIEW SHOWN ROLLED OUT FLAT.

AUTOMATIC TANK GAUGE



m = ANCHOR
Z = GROUND

MOTT TANK INSPECTION, INC.

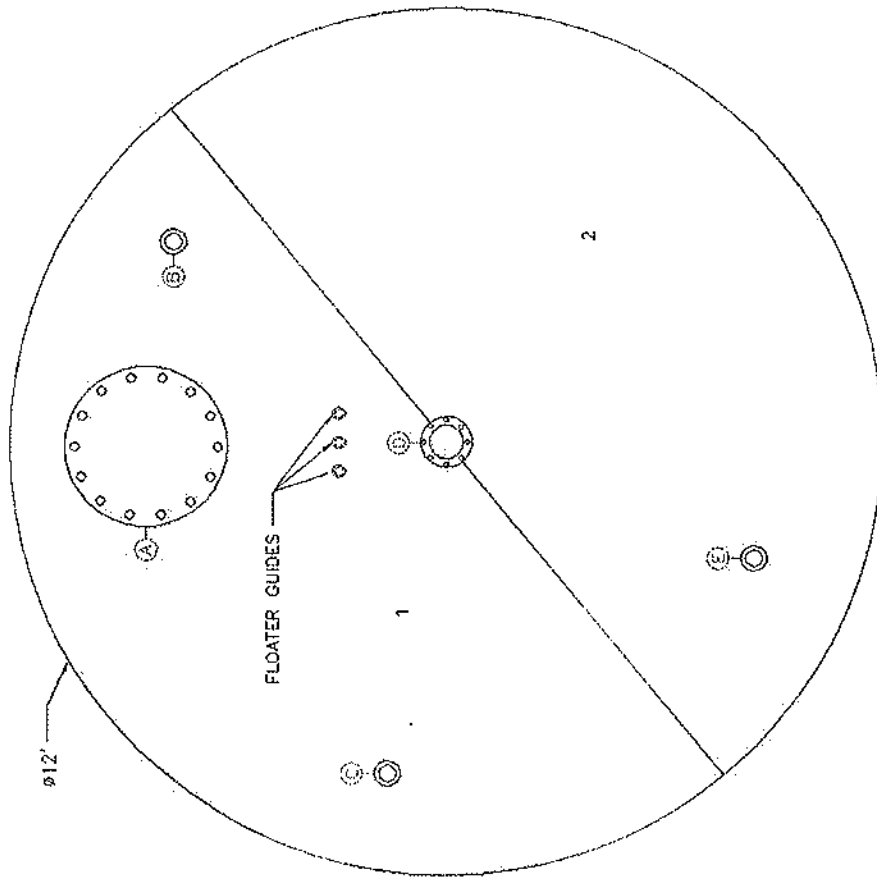
570-536-3944	Name: SAFETY KLEEN
Date: 09/17/2013	Location: Sanford, Florida
Scale: NTS	Service: Waste Solvent
CS13-MB1118	Material: Carbon Steel Construction
Tank# 001	Shell Layout - 2013

Sheet: 1 of 1

SIZE	ITEM	SIZE	ITEM
A 3"	BLANK	D 3"	BLANK
B 3"	BLANK	E 3"	BLANK
C 3"	PRODUCT	F 24"	MANWAY

TOP HEAD

TANK# 001

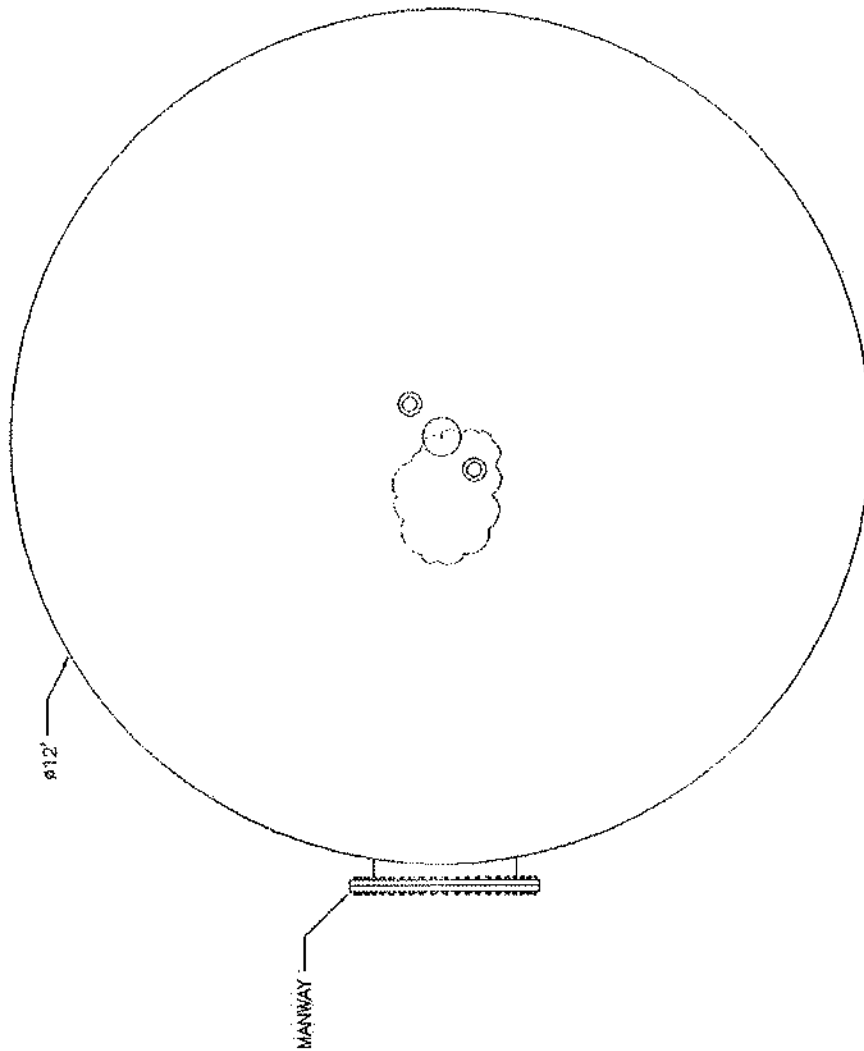



SIZE	ITEM	MOTT TANK INSPECTION, INC.			
A	24" MANWAY	570-586-3944	Name: SAFETY KLEEN		
B	3" VENT	Date: 03/17/2013	Location: Sanford, Florida		
C	3" BLANK	Scale: NTS	Service: Waste Solvent		
D	3" HIGH LEVEL ALARM	CS13-MD1118	Material: Carbon Steel Construction		
E	3" FOAM LINE	Tank# 001	Top Layout - 2013		
				Sheet: 1 of 1	

INTERNAL BOTTOM

HEAD

TANK # 11

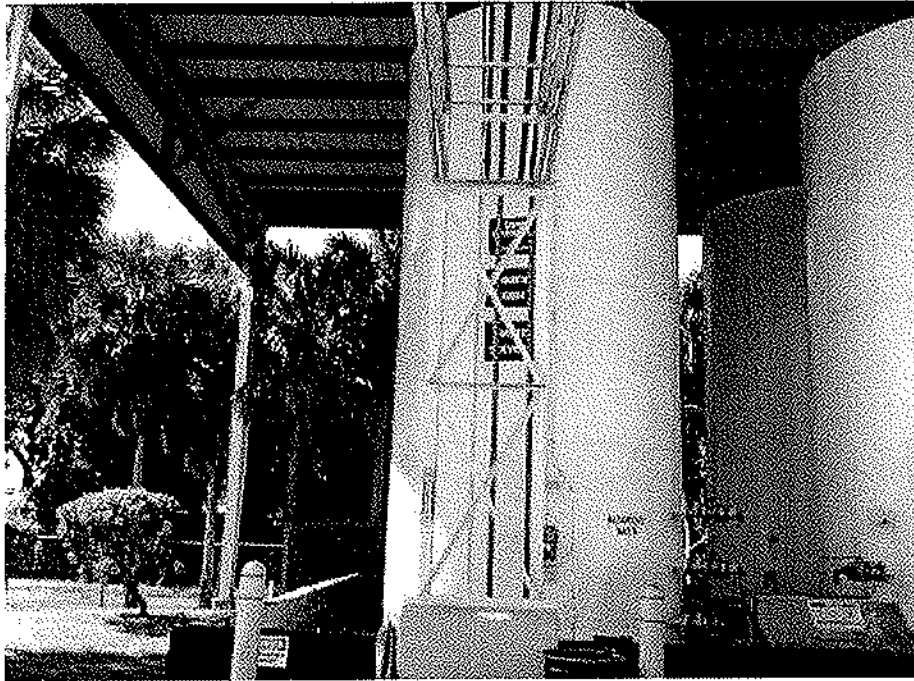


 = AREA OF PITTING

MOTT TANK INSPECTION, INC.			
570-586-3944	Name: SAFETY KLEEN		
Date: 08/17/2013	Location: Sanford, Florida		
Scale: NTS	Service: Waste Solvent		
CS13-M01118	Material: Carbon Steel Construction		
Tank # 001	Bottom Layout - 2013		
			Sheet: 1 of 1

APPENDIX B

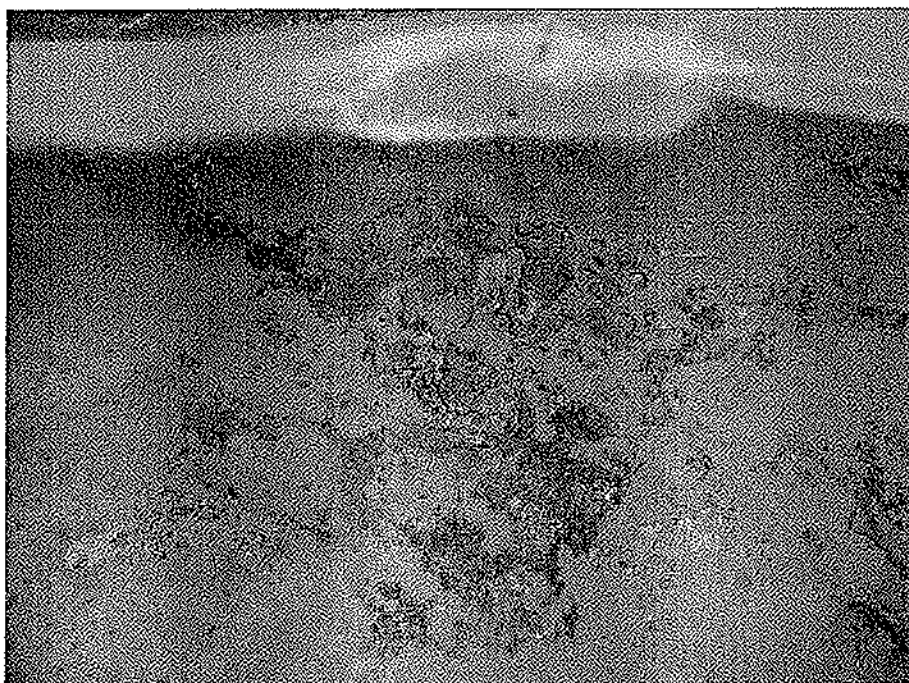
Photographs



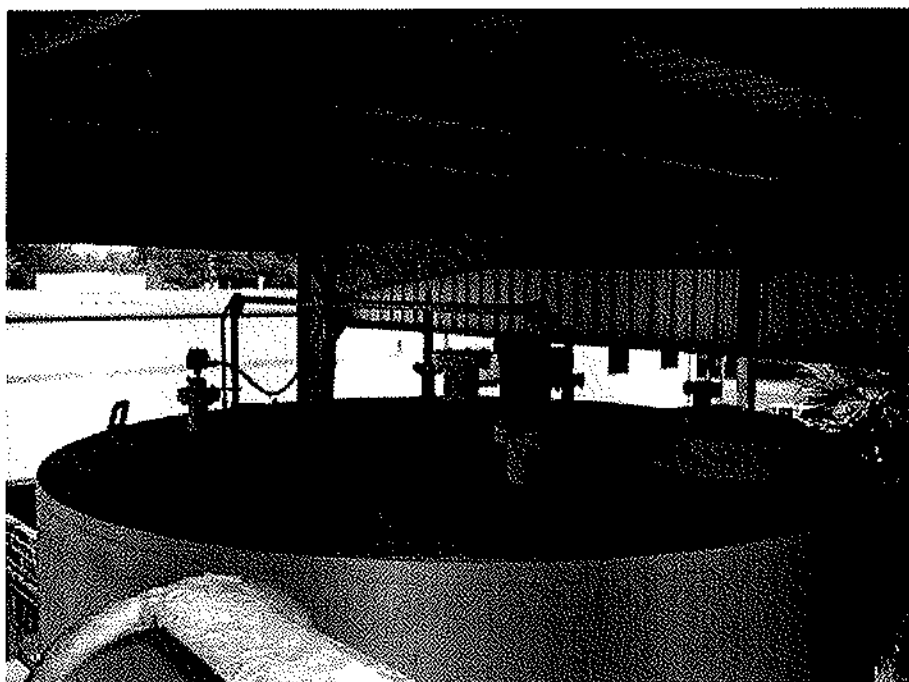
Tank 001



Pitting Marked for Repair on the Floor



Close Up of Pitting



Top of the Tank



Containment Area

Documentation Package

Install Patch Plate

Safety-Kleen

Sanford, FL



CONSOLIDATED, INC.

Fabrication & Constructors • 3851 Edgeworth Street • Corp. 219-46400 • (219) 219-1150 • Fax (219) 219-1151

CFC Job# 19008
Safety-Kleen
600 Central Park Dr
Sanford, FL 32771

Tk#
Foreman: Chris Anstead
219-746-3239
Date: 9/20/13

SCOPE OF WORK:

- Move In / Site Specific Safety Meeting / Setup
- Install one (1) ¼" thick x 18" x 24" patch plate w/ all rounded corners and Vacuum Test
- Clean up / Move out

QW-482 SUGGESTED FORMAT FOR WELDING PROCEDURE SPECIFICATION (WPS)
(See QW-200.1, Section IX, ASME Boiler and Pressure Vessel Code)

Company Name Consolidated Fabrication & Constructors, Inc. By: Richard D. Spork
Welding Procedure Specification No. 401N Date 6-6-86 Supporting PQR No. (s) 101N & 302N
Revision No. 2 Date 2-1-91
Welding Process(es) SMAW Type(s) Manual
(Automatic, Manual, Machine, or Semi-Auto.)

JOINTS (QW-402)

Details

Joint Design See Attached Sketch
Backing (Yes) With or Without (No) _____
Backing Material (Type) PI
(Refer to both backing and retainers.)

☒ Metal ☐ Nonfusing Metal
☐ Nonmetallic ☐ Other

Sketches, Production Drawings, Weld Symbols or Written Description should show the general arrangement of the parts to be welded. Where applicable, the root spacing and the details of weld groove may be specified.

(At the option of the Mfr., sketches may be attached to illustrate joint design, weld layers and bead sequence, e.g. for notch toughness procedures, for multiple process procedures, etc.)

***BASE METALS (QW-403)**

P-No. I Group No. _____ to P-No. I Group No. _____

OR

Specification type and grade _____
to Specification type and grade _____

OR

Chem. Analysis and Mech. Prop. _____
to Chem. Analysis and Mech. Prop. _____

Thickness Range:

Base Metal: Groove .0625" up to 8.0" Fillet All thicknesses
Pipe Dia. Range: Groove All Diameters Within Thickness range Fillet All Diameters
Other _____

***FILLER METALS (QW-404)**

Spec. No. (SFA)	<u>5.1</u>	<u>5.1</u>
AWS No. (Class)	<u>E-6010</u>	<u>E-7018</u>
F-No.	<u>3</u>	<u>4</u>
A-No.	<u>1</u>	<u>1</u>
Size of Filler Metals	<u>3/32", 1/8"</u>	<u>3/32", 1/8", 5/32", 3/16"</u>
Weld Metal		
Thickness Range:		
Groove	<u>Up to 1/4"</u>	<u>Up to 1 1/4"</u>
Fillet	<u>All Thicknesses</u>	<u>All thicknesses</u>
Electrode-Flux (Class)	<u>None</u>	<u>None</u>
Flux Trade Name	<u>N/A</u>	<u>N/A</u>
Consumable Insert	<u>None</u>	<u>None</u>
Other	<u>None</u>	<u>None</u>

*Each base metal-filler metal combination should be recorded individually.

POSITIONS (QW-405) Position(s) of Groove <u>All</u> Welding Progression: Up <u>X</u> Down _____ Position(s) of Fillet <u>All</u>	POSTWELD HEAT TREATMENT (QW-407) NONE Temperature Range _____ Time Range _____																
PREHEAT (QW-406) Preheat Temp. Min. <u>50°F (over 1-1/4" thick 200°F)</u> Interpass Temp. Max. <u>600°F</u> Preheat Maintenance <u>N/A</u> (Continuous or special heating where applicable should be recorded)	GAS (QW-408) <div style="text-align: center;">NONE</div> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Gas(es)</th> <th style="text-align: center;">Percent Composition (Mixture)</th> <th style="text-align: center;">Flow Rate</th> </tr> </thead> <tbody> <tr> <td>Shielding</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>Trailing</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>Backing</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table>		Gas(es)	Percent Composition (Mixture)	Flow Rate	Shielding	_____	_____	_____	Trailing	_____	_____	_____	Backing	_____	_____	_____
	Gas(es)	Percent Composition (Mixture)	Flow Rate														
Shielding	_____	_____	_____														
Trailing	_____	_____	_____														
Backing	_____	_____	_____														

ELECTRICAL CHARACTERISTICS (QW-409) Current AC or DC <u>DC</u> Polarity <u>Reverse</u> Amps (Range) <u>See Chart</u> Volts (Range) <u>See Chart</u> (Amps and volts range should be recorded for each electrode size, position, and thickness, etc. This information may be listed in a tabular form similar to that shown below.)	
Tungsten Electrode Size and Type <u>N/A</u> <div style="text-align: right;">(Pure Tungsten, 2% Thoriated, etc.)</div>	
Mode of Metal Transfer for GMAW <u>N/A</u> <div style="text-align: right;">(Spray arc, short circuiting arc, etc.)</div>	
Electrode Wire feed speed range <u>N/A</u>	

TECHNIQUE (QW-410) String or Weave Bead <u>String and/or Weave</u> Orifice or Gas Cup Size <u>N/A</u> Initial and Interpass Cleaning (Brushing, Grinding, etc.) <u>Brushing, Grinding, Filing and or Needle Scaling</u>	
Method of Back Gouging <u>Air Arc and or grinding</u> Oscillation <u>N/A</u> Contact Tube to Work Distance <u>N/A</u> Multiple or Single Pass (per side) <u>Multiple</u> Multiple or Single Electrodes <u>Single</u> Travel Speed (Range) <u>N/A</u> Peening <u>Not Allowed</u> Other <u>Each pass shall not exceed 1/8" thick.</u> <u>This WPS will restrict normal weld thickness up to 1 1/2"</u> <u>For base metal thickness less than 3/16"; use E-7018 electrode only</u>	

Weld Layer(s)	Process	Filler Metal		Current		Volt Range	Travel Speed Range	Other (e.g., Remarks, Comments, Hot Wire Addition, Technique, Torch Angle, Etc.)
		Class	Dia.	Type Polar.	Amp. Range			
1	SMAW	E-6010	3/32"	EP	90-120	20-24		
	SMAW	E-6010	1/8"	EP	110-140	22-26		
2	SMAW	E-7018	3/32"	EP	90-120	20-24		
	SMAW	E-7018	1/8"	EP	110-140	22-26		
	SMAW	E-7018	5/32"	EP	130-180	23-28		
	SMAW	E-7018	3/16"	EP	150-210	24-29		

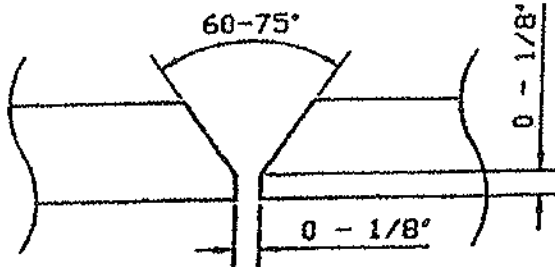


CONSOLIDATED, INC.

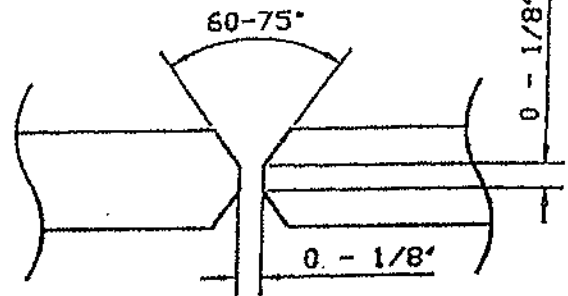
Fabrication & Constructors • 3851 Ellsworth Street • Gary, IN 46408 • (219) 984-6150 • Fax (219) 984-6652

JOINT PREPARATIONS

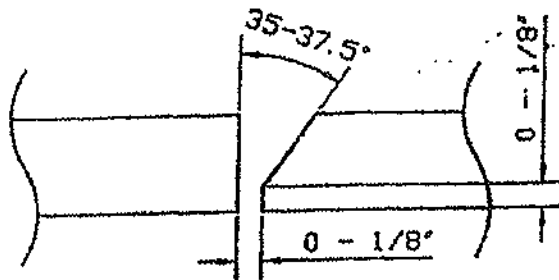
SINGLE VEE GROOVE



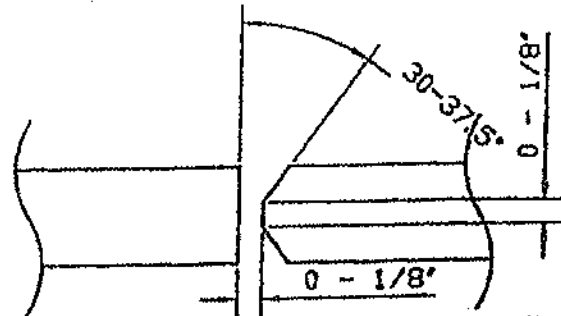
DOUBLE VEE GROOVE



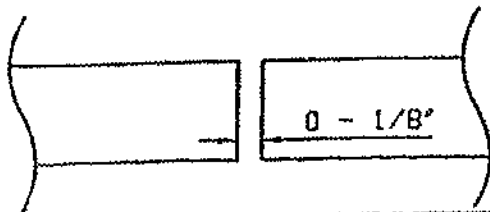
SINGLE BEVEL GROOVE



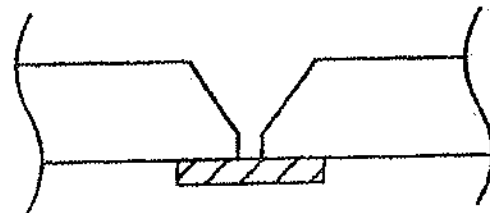
DOUBLE BEVEL GROOVE



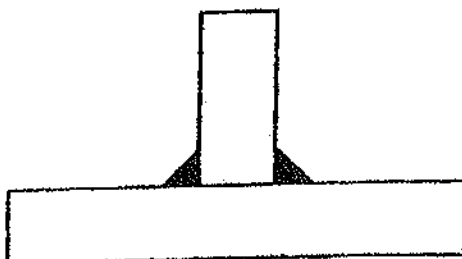
SQUARE GROOVE



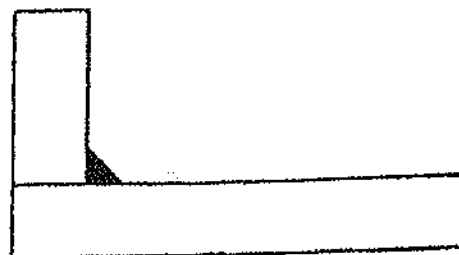
BACKING STRIP



FILLET WELD



FILLET WELD

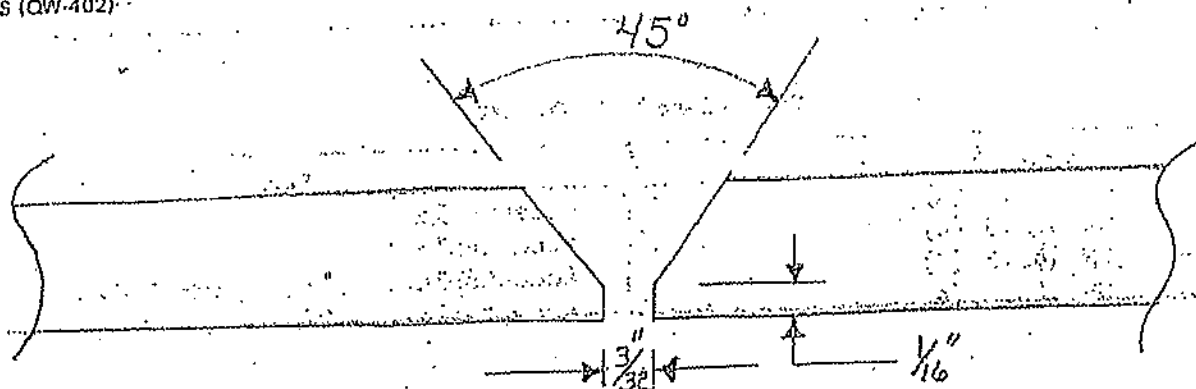


QW-483 SUGGESTED FORMAT FOR PROCEDURE QUALIFICATION RECORD (PQR)
 (See QW-201.2, Section IX, ASME Boiler and Pressure Vessel Code)
 Record Actual Conditions Used to Weld Test Coupon.



Company Name Consolidated Fabrication & Constructors, Inc.
 Procedure Qualification Record No. 101N Date January 23, 1986
 WPS No. 101N
 Welding Process(es) S.M.A.W.
 Types (Manual, Automatic, Semi-Auto.) Manual

JOINTS (QW-402)



Groove Design of Test Coupon

(For combination qualifications, the deposited weld metal thickness shall be recorded for each filler metal or process weld.)

BASE METALS (QW-403)

Material Spec. S.A. - 53 Grade B
 Type or Grade I
 P-No. I to P.No. I
 Thickness of Test Coupon .237"
 Diameter of Test Coupon 4.0"
 Other

POSTWELD HEAT TREATMENT (QW-407)

Temperature None
 Time N/A
 Other

GAS (QW-408)

Type of Gas or Gases N/A
 Composition of Gas Mixture N/A
 Other

FILLER METALS (QW-404)

Weld Metal Analysis A-No. I
 Size of Filler Metal 1/8"
 Filler Metal F-No. 4
 SFA Specification SEA 5.1
 AWS Classification E-7018
 Other

ELECTRICAL CHARACTERISTICS (QW-409)

Current D.C.
 Polarity Reverse
 Amps. 80-120 Volts 18-22
 Tungsten Electrode Size N/A
 Other

POSITION (QW-405)

Position of Groove 6G
 Weld Progression (Uphill, Downhill) Uphill
 Other

TECHNIQUE (QW-410)

Travel Speed 1-5 inches per minute
 String or Weave Bead String/Weave
 Oscillation None
 Multipass or Single Pass (per side) Multiple
 Single or Multiple Electrodes Single
 Other

PREHEAT (QW-406)

Preheat Temp. 50 Degrees F. Minimum
 Interpass Temp. N/A
 Other

QW-483 (Back)

Tensile Test (QW-150)

PQR No. 101N

Specimen No.	Width	Thickness	Area	Ultimate Total Load lb.	Ultimate Unit Stress psi.	Type of Failure & Location
G0295 A	.756	.211	.160	13,600	84,900	Weld
G0295 B	.756	.216	.163	13,900	85,100	Weld

Guided Bend Tests (QW-160)

Type and Figure No.	Result
Face A QW 463.3 (a)	Acceptable
Face B QW 463.3 (a)	Acceptable
Root A QW 463.3 (a)	Acceptable .055 2 pin holes
Root B QW 463.3 (a)	Acceptable .065

Toughness Tests (QW-170)

Specimen No.	Notch Location	Notch Type	Test Temp.	Impact Values	Lateral Exp.		Drop Weight	
					% Shear	Mils.	Break	No Break

Fillet Weld Test (QW-180)

Result — Satisfactory: Yes _____ No _____ Penetration into Parent Metal: Yes _____ No _____

Macro-Results _____

Other Tests

Type of Test _____

Deposit Analysis _____

Other _____

Welder's Name

Edward P. Podkul

Clock No. 2

Stamp No. _____

Tests conducted by:

G-Squared Metallurgical

Laboratory Test No. G0295

We certify that the statements in this record are correct and that the test welds were prepared, welded and tested in accordance with the requirements of Section IX of the ASME Code.

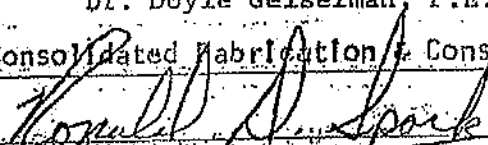
Dr. Doyle Geiselman, P.E. 1/29/86

Manufacturer

Consolidated Fabrication & Constructors, Inc.

Date July 23 1986

By



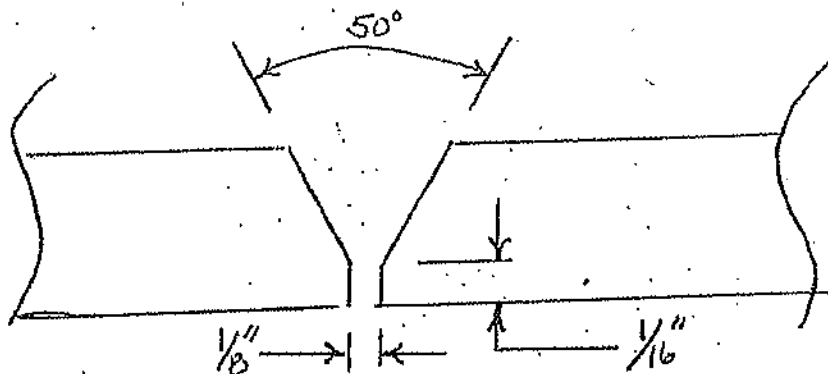
(Detail of record of tests are illustrative only and may be modified to conform to the type and number of tests required by the Code.)

QW-483 SUGGESTED FORMAT FOR PROCEDURE QUALIFICATION RECORD
 (See QW-201.2, Section IX, ASME Boiler and Pressure Vessel Code)
 Record Actual Conditions Used to Weld Test Coupon.



Company Name Consolidated Fabrication & Constructors, Inc.
 Procedure Qualification Record No. 302N Date March 15, 1988
 WPS No. 1QIN Revision 1
 Welding Process(es) SMAW
 Types (Manual, Automatic, Semi-Auto.) Manual

JOINTS (QW-402)



Groove Design of Test Coupon

(For combination qualifications, the deposited weld metal thickness shall be recorded for each filler metal or process weld.)

BASE METALS (QW-403)

Material Spec. SA-516
 Type or Grade Grade 70
 P.No. 1 to P.No. 1
 Thickness of Test Coupon 1.5"
 Diameter of Test Coupon N/A
 Other _____

POSTWELD HEAT TREATMENT (QW-407)

Temperature None
 Time N/A
 Other _____

GAS (QW-408)

Type of Gas or Gases N/A
 Composition of Gas Mixture N/A
 Other _____

FILLER METALS (QW-404)

Weld Metal Analysis A-No. 1
 Size of Filler Metal 1/8" & 5/32"
 Filler Metal F-No. 3 & 4
 SFA Specification SFA 5.1
 AWS Classification E-6010 & E-7018
 Other APPROXIMATE DEPOSIT WELD THICKNESS FOR E-6010 = 1/8"
REMAINDER OF WELD THICKNESS DEPOSIT IS E-7018.
P.S. 2-6-91

ELECTRICAL CHARACTERISTICS (QW-409)

Current D.C.
 Polarity Reverse
 Amps. 115 & 180 Volts 19 & 24
 Tungsten Electrode Size N/A
 Other _____

POSITION (QW-405)

Position of Groove 1G
 Weld Progression (Uphill, Downhill) N/A
 Other _____

TECHNIQUE (QW-410)

Travel Speed 1"-5" per minute
 String or Weave Bead String/Weave
 Oscillation None
 Multipass or Single Pass (per side) Multiple
 Single or Multiple Electrodes Single
 Other _____

PREHEAT (QW-406)

Preheat Temp. 50 F Min.
 Interpass Temp. N/A
 Other _____

QW-183 (Back)

PQR No. 302N

Tensile Test (QW-150)

Specimen No.	Width	Thickness	Area	Ultimate Total Load lb.	Ultimate Unit Stress psi	Type of Failure & Location
A	.758	.679	.515	45,000	87,400	Weld - Ductile
B	.780	.745	.581	48,000	82,600	" "
C	.747	.693	.518	44,400	85,700	" "
D	.769	.724	.557	45,000	80,800	" "

Guided Bend Tests (QW-160)

Type and Figure No.	Result
A Side Bend	Acceptable - No defects
B " "	" "
C " "	" "
D " "	" "

Toughness Tests (QW-170)

Specimen No.	Notch Location	Notch Type	Test Temp.	Impact Values	Lateral Exp.		Drop Weight	
					% Shear	Mils	Break	No Break

Fillet Weld Test (QW-180)

Result — Satisfactory: Yes _____ No _____ Penetration into Parent Metal: Yes _____ No _____
 Macro-Results: _____

Other Tests

Type of Test _____
 Deposit Analysis _____
 Other _____

Welder's Name Michael Dropp Clock No. 6 Stamp No. 6
 Tests conducted by: Calumet Associates, Inc. Laboratory Test No. C3952
 We certify that the statements in this record are correct and that the test welds were prepared, welded and tested in accordance with
Dr. Doyle Geiselman, P.E.
 the requirements of Section IX of the ASME Code. Consolidated Fabrication & Constructors, Inc. 3/21/88
 Manufacturer _____
 Date March 15, 1988 By Ronald D. Spork
 (Detail of record of tests are illustrative only and may be modified to conform to the type and number of tests required by the Code.)
 Ronald D. Spork

MSi Testing & Engineering, Inc.

Your Source for Metallurgical Testing and Failure Analysis

1390 N. 25th Avenue
Melrose Park, IL 60160
708-343-3444
F A X-3033



TESTING CERT 30310 01

Calumet Testing Service, Inc.
1945 North Griffith Blvd.
Griffith, IN 46319

Report No.: 147224-3
Date: 6-15-09
Order No.: 4314-14402
Page: 1 of 1

Attn: Mr. John Korienek

SAMPLE IDENTIFICATION

Size	Sample I.D.	Description	Specification
1 1/2	401N	Welded Plate	API 650, Sect. 7

TEST RESULTS *

Charpy Impact Testing

Specimen Orientation: Transverse to Weld
Test Temperature: -20°F
Specimen Size: 10mm x 10mm
Notch Type: V
Notch Location: See Below

	Weld			Heat Affected Zone		
Absorbed Energy, ft-lbs	18	83	110	166	107	100
Lateral Expansion, .001"	20	69	85	95	75	70
% Shear	20	40	60	90	80	70

* Testing performed in accordance with ASTM A370 and E23 using a digitally encoded 700 ft-lb impact tester.

Respectfully Submitted,

MSi Testing & Engineering Inc.

George A. Prause

George A. Prause
Staff Metallurgical Engineer

GAP/jc/E-Document

The Above Test Report Relates Only To The Items Tested And Shall Not Be Reproduced Except In Full, Without The Written Consent Of MSi Testing & Engineering, Inc.
All Specimen Remnants Pertaining To The Above Tested Items Are Retained For a Maximum Of 30 Days, Unless Notified In Writing.
Template: Reports:_Report Templates\Calumet Testing - address.doc

Consolidated Fabrication and Constructors, Inc.
3851 Ellsworth Street
Gary, IN 46408

Welder / Welding Operator Performance Qualification (WPO)

Welder's name <u>Chris Anstead</u>	WPS: <u>401N Rev. 2</u>	Stamp no. <u>207</u>
Welding process(es) used <u>Shielded Metal Arc Welding</u>	Clock Number <u>708</u>	Type: <u>Manual</u>
Base material(s) welded <u>SA-36</u>		Thickness: <u>.750"</u>

Note: WO= Without, W= With

Welder Variables (QW-350)	Actual Values Used	Range Qualified
P-No. to P-No.	P-No. 1 to P-No. 1	P-1 thru P-11, P-34 & P-4X to the same
Plate or Pipe	Plate	Thru 1.50"
Pipe Diameter (in)	N/A	Note 1
Welding Process	SMAW	SMAW
Backing **	WO	W
AWS Classification	E6010	E7018
Filler Metal Specification (SFA)	5.1	5.1, 5.4 (non-austenitic) & 5.5
Filler Metal F-No.	F3	F1 thru F4- W
Weld deposit thickness (in)	0.100"	Thru 1.30"
Number of weld layers	1	See thickness Qualification
Welding position	2G, 3G & 4G	All
Weld Progression	Vertical Up	Vertical Up
Consumable insert	N/A	N/A
Backing gas	N/A	N/A
Transfer Mode	N/A	N/A
Current / Polarity	DCEP	DCEP or DCEN

Machine Welder Variables (QW-360)	Actual Values Used	Range Qualified
Direct / remote visual control	N/A	N/A
Automatic voltage control	N/A	N/A
Automatic joint tracking	N/A	N/A
Welding position	N/A	N/A
Consumable insert	N/A	N/A
Backing **	N/A	N/A
Single / multiple pass per side	N/A	N/A

Fillet Welds: Qualified to make fillet welds of any size on all base material thickness and pipe diameters of any size

Welds with backing include fillets and double V-Groove welds

Note 1: All plate and pipe over 24", 1G & 2G on pipe 2.875" thru 24"

Guided Bend Test (QW-160)

Figure Number and Type	Result	Figure Number and Type	Result
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

Visual examination results:	<u>Satisfactory per QW-302.4 and QW-194</u>
Radiographic test results:	<u>Satisfactory per QW-302.2 and QW-191</u>
Welding test conducted by:	<u>Consolidated Fabrication and Constructors, Inc.</u>

Mechanical / Radiographic tests conducted by: Cahmet Testing Services, Inc. Job# 9315

We certify that the statements in this record are correct and that the test coupons were prepared, welded, and tested in accordance with the requirements of Section IX of the A.S.M.E. Code.

Organization: Consolidated Fabrication and Constructors, Inc.

Certified by: <u>Richard D. Spork</u>	Quality Control Manager	05-06-94 Date
---------------------------------------	-------------------------	------------------

<u>Clock</u>	<u>Stamp</u>	<u>Processes</u>	<u>Name</u>	<u>Yr/Mo</u>	<u>Job #</u>
708	207	S	Christopher R. Anstead	12/09	16498
708	207	S		12/10	17494
708	207	S		12/11	17494
708	207	S		12/12	17494
708	207	S		13/01	18070
708	207	S		13/02	17418
708	207	S		13/03	18143
708	207	S		13/04	18379
708	207	S		13/05	18256
708	207	S		13/06	18484
708	207	S		13/07	18652
708	207	S		13/08	18652
708	207	S		13/09	18397

Process Legend

S = SMAW

M = GMAW

G = GTAW

F = FCAW

U = SAW

end of list.....

2097	105613	Material/Part Reference for Job Number 19008				pg 1			
Rev No	Item	Description	Quantity	Unit	Material	Part	Slab	Draw	Notes
10094	1090	1/4" x 96" SA-36 Mod Steel Plate	1	PC	SA-36	AS1855			LIST
10095	1053	1/4" x 24" SA-36 Steel Plate	2	PC	SA-36	AS1855			LIST

end of report....



Kloeckner Metals Corp - CHI
12900 S. Metron Drive
Chicago, IL 60633
August 08, 2013

Material Certifications For Shipment

BI Num: 80198413

Customer
Consolidated Fabrications and
Constructors, Inc
3851 Ellsworth Street
Gary, IN 46403

Ship To
Consolidated Fabrications
3851 Ellsworth St
Gary, IN 46403 2013

Orders

Order	GA Ord	Width	Length	Description/Part Number	Grade
9751469	1	96	240	MIL Balled Plate 1 1/2"	ASTM A36 / ASME-SA36
				1496340	

Cust PO: 125316

Heat: A35185

Mill ID:

Vendor: NEMAK STEEL TUSCALOOSA INC

Carbon Equivalent: .36

Chemical Properties

C	Mn	P	S	Si	Al	Ca	Cr	Cu	Mo
.19	.25	.011	.007	.03	.031	.0016	.06	.24	.017
N	Ni	Sn	V						
.01	.06	.008	.001						

Physical Properties

Property	YIELD	TENSILE
Mill Test		
Internal Test Head		
Internal Test Middle		
Internal Test Tail		

Charpy Properties

Property	CHARPY SAMPLE	IMPACT FT-LBS1	IMPACT FT-LBS2	IMPACT FT-LBS3	AVG FT- LBS
Value					
Internal Test Head					
Internal Test Middle					
Internal Test Tail					

We certify that the listed information is correct as contained in the records of the company and that all results meet the requirements of the specification cited above. All ASME Section II Part A specifications are 2010 Edition, 2011 Addenda. Certified per UG-10. All Charpy tests are at -20 F unless otherwise indicated.



Load Number	Tally	Mill Order Number	PO NO	Line NO	Part Number	Certificate Number	Prepared													
5032932	0000000504563	N-120533-011	66-0586	11		L421631-1	06/04/2013 16:47													
Grade																				
Customer:																				
Order Description:																				
A36, 0.2500 IN x 96.000 IN x 240.000 IN																				
Quality Plan Description:																				
A36/MDN-TRIPLE: ASTM A36-08 MOD MIN/ASME SA36-03/A709-36-10																				
Shipped Item	Heat/Slab Number	Certified By	C	Mn	P	S	Si	Cu	Ni	Cr	Mo	Cb	V	Al	Ti	N2	B	Ca	Sn	CEV
3E31178	8356798-03 ***	8356798	0.19	0.85	0.014	0.004	0.06	0.25	0.06	0.08	0.017	0.000	0.001	0.027	0.001	0.010	0.0001	0.0018	0.009	0.37
3E3117C	8356798-03 ***	8356798	0.19	0.85	0.014	0.004	0.06	0.25	0.06	0.08	0.017	0.000	0.001	0.027	0.001	0.010	0.0001	0.0018	0.009	0.37
3E3117D	8356798-03 ***	8356798	0.19	0.85	0.014	0.004	0.06	0.25	0.06	0.08	0.017	0.000	0.001	0.027	0.001	0.010	0.0001	0.0018	0.009	0.37
3E3138E	A351893-04 ***	A351893	0.17	0.83	0.013	0.006	0.04	0.25	0.06	0.08	0.020	0.000	0.001	0.031	0.001	0.009	0.0000	0.0021	0.007	0.35
3E3139C	A351893-04 ***	A351893	0.17	0.83	0.013	0.006	0.04	0.25	0.06	0.08	0.020	0.000	0.001	0.031	0.001	0.009	0.0000	0.0021	0.007	0.35
3E3139D	A351893-04 ***	A351893	0.17	0.83	0.013	0.006	0.04	0.25	0.06	0.08	0.020	0.000	0.001	0.031	0.001	0.009	0.0000	0.0021	0.007	0.35
3E3216B	A351895-05 ***	A351895	0.19	0.85	0.011	0.007	0.03	0.24	0.06	0.06	0.017	0.000	0.001	0.031	0.000	0.010	0.0000	0.0016	0.008	0.36
3E3216C	A351895-05 ***	A351895	0.19	0.85	0.011	0.007	0.03	0.24	0.06	0.06	0.017	0.000	0.001	0.031	0.000	0.010	0.0000	0.0016	0.008	0.36
3E3216D	A351895-05 ***	A351895	0.19	0.85	0.011	0.007	0.03	0.24	0.06	0.06	0.017	0.000	0.001	0.031	0.000	0.010	0.0000	0.0016	0.008	0.36
3E3249B	A351898-03 ***	A351898	0.18	0.86	0.011	0.006	0.05	0.23	0.10	0.05	0.016	0.000	0.001	0.031	0.000	0.009	0.0001	0.0014	0.008	0.35
3E3249C	A351898-03 ***	A351898	0.18	0.86	0.011	0.006	0.05	0.23	0.10	0.05	0.016	0.000	0.001	0.031	0.000	0.009	0.0001	0.0014	0.008	0.35
3E3249D	A351898-03 ***	A351898	0.18	0.86	0.011	0.006	0.05	0.23	0.10	0.05	0.016	0.000	0.001	0.031	0.000	0.009	0.0001	0.0014	0.008	0.35
3E3269E	A351900-05 ***	A351900	0.18	0.83	0.008	0.004	0.06	0.25	0.11	0.06	0.017	0.000	0.001	0.032	0.001	0.010	0.0000	0.0019	0.007	0.36
3E3270C	B356814-02 ***	B356814	0.19	0.85	0.009	0.004	0.06	0.24	0.08	0.05	0.018	0.000	0.001	0.032	0.001	0.005	0.0001	0.0016	0.007	0.36
3E3270D	B356814-02 ***	B356814	0.19	0.85	0.009	0.004	0.06	0.24	0.08	0.05	0.018	0.000	0.001	0.032	0.001	0.005	0.0001	0.0016	0.007	0.36
3E3272B	B356814-01 ***	B356814	0.19	0.85	0.009	0.004	0.06	0.24	0.08	0.05	0.018	0.000	0.001	0.032	0.001	0.005	0.0001	0.0016	0.007	0.36
3E3273B	B356814-04 ***	B356814	0.19	0.85	0.009	0.004	0.06	0.24	0.08	0.05	0.018	0.000	0.001	0.032	0.001	0.005	0.0001	0.0016	0.007	0.36
3E3273C	B356814-04 ***	B356814	0.19	0.85	0.009	0.004	0.06	0.24	0.08	0.05	0.018	0.000	0.001	0.032	0.001	0.005	0.0001	0.0016	0.007	0.36
3E3273D	B356814-04 ***	B356814	0.19	0.85	0.009	0.004	0.06	0.24	0.08	0.05	0.018	0.000	0.001	0.032	0.001	0.005	0.0001	0.0016	0.007	0.36

Mercury has not come in contact with this product during the manufacturing process not has any mercury been used by the manufacturing process. Certified in accordance with EN 10204 3.1. No weld repair has been performed on this material. Manufactured to a fully killed fine grain practice. NUTEMPER TEMPER PASSED plate from coil

ISO 9001:2008 Registered, PED Certified

**** indicates Heats melted and Manufactured in the U.S.A.

We hereby certify that the product described above passed all of the tests required by the specifications.

Quilin Yu
Dr. Quilin Yu - Metallurgist

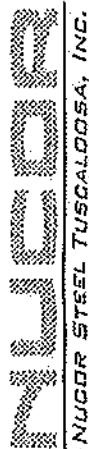


NUCOR STEEL TUSCALOOSA, INC.

MILL TEST CERTIFICATE

1700 HOLT RD. S.E.
TUSCALOOSA, AL 35404-1600
800-827-3572

Load Number	Tally	Mill Order Number	PO NO Line NO	Part Number	Certificate Number	Prepared										
B032932	00000000504503	N-120533-011	56-0336 11		1-21631-1	06/04/2013 16:47										
Grade: Customer:																
Order Description: Sold TO: A36, 0.3500 IN X 96.000 IN X 240.000 IN KLOECKNER METALS Chicago IL Quality Plan Description: Ship TO: A36/004P-TRIPLE: ASTM A36-08 MOD W/ASME SA36-03/4799-26-10 KLOECKNER METALS Chicago IL																
Shipped Item	Certified By	Heat Number	Yield ksi	Tensile ksi	Y/T %	ELONGATION %		Bend OK?	Hard HB	Charpy Impacts (ft.-lbs)			Shear %			Test Temp
						2"	8"			Size mm	1	2	3	1	2	
3E32160	3E32114FT	A351895 ***	51.0	71.2	72.4	37.9										
3E32160	3E32114FT	A351895 ***	50.5	70.2	72.4	38.2										
3E32160	3E32114FT	A351895 ***	49.0	70.4	69.6	38.0										
3E32160	3E32114FT	A351895 ***	53.2	73.0	72.9	33.2										
3E32160	3E3214FT	A351895 ***	50.5	71.7	70.4	31.3										
3E32160	3E32114FT	A351895 ***	52.8	69.0	76.5	29.1										
3E32160	3E3214FT	A351895 ***	51.6	69.7	74.0	26.6										
3E32160	3E32114FT	A351895 ***	53.2	73.0	72.9	33.2										
3E32160	3E3214FT	A351895 ***	50.5	71.7	70.4	31.3										
3E32160	3E32114FT	A351895 ***	52.8	69.0	76.5	29.1										
3E32160	3E3214FT	A351895 ***	51.6	69.7	74.0	26.6										
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3E321																



NUCOR STEEL TUSCALOOSA, INC.

MILL TEST CERTIFICATE

1700 HOLT RD N.E.
TUSCALOOSA, AL 35404-1000
800-827-3872

Load Number	Tally	Mill Order Number	PO NO	Line NO	Part Number	Certificate Number	Prepared					
3032932	0000000504563	N 120533 011	5640566	11		L421631-1	05/04/2013 16:47					
Customer:												
Order Description:												
A36, 0.2500 IN x 96.000 IN x 240.000 IN												
Quality Plan Description:												
A36/ODNN-TRIPLE: ASTM A36-08 MOD MIN/ASME SA36-03/A709-36-10												
Shipped Item	Certified By	Heat Number	Yield ksi	Tensile ksi	Y/T %	ELONGATION % 2" 8"	Bend OK?	Hard HB	Charpy Impacts (ft-lbs) Size mm 1 2 3	Shear % 1 2 3	Avg	Test Temp
3E3269E	3E3269EFTT	A351900 ***	48.4	71.7	67.5	30.0						
3E3269E	3E3269EFTT	A351900 ***	50.0	67.2	74.4	27.1						
3E3270C	3E3274FTT	B356814 ***	47.2	70.6	66.9	28.8						
3E3270C	3E3275FTT	B356814 ***	53.4	72.0	74.2	28.1						
3E3270C	3E3274MTT	B356814 ***	48.5	67.1	72.3	31.2						
3E3270C	3E3275MTT	B356814 ***	48.4	67.3	71.9	27.7						
3E3270D	3E3274FTT	B356814 ***	47.2	70.6	66.9	28.8						
3E3270D	3E3275FTT	B356814 ***	53.4	72.0	74.2	28.1						
3E3270D	3E3274MTT	B356814 ***	48.5	67.1	72.3	31.2						
3E3270D	3E3275MTT	B356814 ***	48.4	67.3	71.9	27.7						
3E3272B	3E3274FTT	B356814 ***	47.2	70.6	66.9	28.8						
3E3272B	3E3275FTT	B356814 ***	53.4	72.0	74.2	28.1						
3E3272B	3E3274MTT	B356814 ***	48.5	67.1	72.3	31.2						
3E3272B	3E3275MTT	B356814 ***	48.4	67.3	71.9	27.7						
3E3273B	3E3274FTT	B356814 ***	47.2	70.6	66.9	28.8						
3E3273B	3E3275FTT	B356814 ***	53.4	72.0	74.2	28.1						
3E3273B	3E3274MTT	B356814 ***	48.5	67.1	72.3	31.2						
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3E3273C	3E3274FTT	B356814 ***	47.2	70.6	66.9	28.8						
3E3273C	3E3275FTT	B356814 ***	53.4	72.0	74.2	28.1						
3E3273C	3E3274MTT	B356814 ***	48.5	67.1	72.3	31.2						

We hereby certify that the product described above passed all of the tests required by the specifications.

Quinn Yu
Quinn Yu - Metallurgist

*** Indicates Heat metal and manufactured in the U.S.A



CONSOLIDATED
Fabrication & Construction

CFC Procedure
CFC VACBOX
Vacuum Box
Form

Date and Revision #

July 1, 2009

Rev 4

1 of 1

Author: Joe White

Engineering Approval:

Vacuum Test Record

Vacuum Gauge Serial #

Surface Temperature Gauge Serial #

Customer SAFETY KLEEN
Job Location SANFORD FL
Tank # Tank # 1
CFC Job # 19008
Test Date SEP 20 - 2013

Reason(s) for Performing Test (Check All That Apply)

- ☐ New Tank Bottom ☐ New Floating Roof ☐ New Tank Fixed Roof
☒ Tank Bottom Patching ☐ Bottom Plate Replacement ☐ Shell to Bottom Weld
☐ Floating Roof Leg Pads ☐ Misc. Bearing/Striker Pads ☐ Column Bearing Pads

Others _____

Base Metal Temperature (Use supplied Surface Temperature Gauge) 70° F

Vacuum Box Gauge Reading (minimum 10 inHg) 16 psi

Vacuum Box Operator: CHRIS ANSTEN

Number of Indications (If Any): NONE

Repair Date (If Applicable): N/A

Re-Test Date (If Applicable): N/A

Field Witnessed By: [Signature]

Date: Sept 20, 2013

Customer Rep: _____

Date: _____

CFC Rep: [Signature]

Date: SEPT 20-213

Record all Indications, Repairs, Re-Tests and Vacuum Box Operator on the CFC or Inspection Drawings

Appendix D
Subpart BB/CC Information



Procedure for Compliance with RCRA Subparts BB and CC

OPERATIONS

Division/Department: Operations
Contact: Alan Israel (847) 468-6787
Procedure: O220-005
Revision: 2
Revision Date: **April 25, 2012**
Supercedes: January 6, '05
Issue Date: November 3, '04
Page: 1 of 12
Approved: Dave Eckelbarger/Bill Ross

Purpose:

The purpose of this Branch Operating Guideline is to provide general guidelines for complying with the requirements for controlling emissions from equipment leaks (Subpart BB) and controlling emissions from containers, tanks, surface impoundments and miscellaneous units (Subpart CC).

Scope:

This procedure applies to all U.S. Safety-Kleen Branches that are permitted Treatment, Storage, and Disposal Facilities (TSDFs).

Responsibilities:

Branch General Manager (BGM)	Branch General Managers are responsible for following these procedures. BGMs also assist the EHS Manager in all compliance issues as they relate to the branch.
Environment Health and Safety Managers (EHS Manager)	EHS Managers are responsible for understanding all federal, state, and local regulatory issues pertaining to maintaining branch compliance with the control of emissions. EHS Managers conduct routine inspections and training to ensure branch compliance with Subparts BB and CC compliance.

Definitions:

Average Volatile Organic Concentration or average VO concentration	Means the mass-weighted average volatile organic concentration of a hazardous waste as determined in accordance with the requirements of 40 CFR 265.1084.
Closed-vent system	A system that is not open to the atmosphere and that is composed of piping, connections, and necessary, flow-inducing devices that transport gas or vapor from a piece or pieces of equipment to a control device.

Closure device	Means a cap, hatch, lid, plug, seal, valve, or other type of fittings that blocks an opening in a cover such that when the device is secured in the closed position it prevents or reduces air pollutant emissions to the atmosphere (Example: a hinged access lid or hatch)
Connector	Any flanged, screwed, welded, or other joined fittings used to connect two pipelines or a pipeline and a piece of equipment. For the purposes of reporting and recordkeeping, connector means flanged fittings that are not covered by insulation or other materials that prevent location of the fittings.
Equipment	Each valve, pump, compressor, pressure relief device, sampling connection system, opened-ended valve or line, or flange, or any control devices or systems required by Subpart BB.
In heavy liquid service	Means that the piece of equipment is not in gas/vapor service or in light liquid service (Example: mineral spirits is a heavy liquid)
In light liquid service	Means that the piece of equipment contains or contacts a waste stream where the vapor pressure of one or more of the components in the stream is greater than 0.3 kilopascals (kPa) at 20°C, the total concentration of the pure components having a vapor pressure greater than 0.3 kPa at 20°C is equal to or greater than 20 percent by weight and the fluid is a liquid at operating conditions (Example: paint thinner is a light liquid)
Level 1 Container	≤ 122 gallons, Storage of any hazardous; no waste stabilization or >122 gallons, "Not in light material service" (See Subpart BB section of this BOG for Light Material Service definition); no waste stabilization
Level 2 Container	>122 gallons, "In light material service," no waste stabilization
Level 3 Container	>26.4 gallons, Stabilization of hazardous waste
Malfunction	Means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or unusual manner. Note: Failures that are caused in part by poor maintenance or careless operation are not malfunctions.
Maximum Organic Vapor Pressure	Means the sum of the individual organic constituent partial pressure exerted by the material contained in a tank, at the maximum vapor pressure-causing conditions (i.e., temperature, agitation, pH effects of combining wastes, etc.) reasonably expected to occur in the tank.
Open-ended valve or line	Any valve, except pressure relief valves, have one side of the valve seat in contact with the process fluid and one side open to the atmosphere, either directly or through open piping.

Point of waste origination

- (1) When the facility owner or operator is the generator of the hazardous waste, point of waste origination means the point where a solid waste is produced by a system, process, or waste management unit is determined to be a hazardous waste as defined by 40 CFR Part 261.
- (2) When the facility owner and operator is not the generator of the hazardous waste, point of the waste origination means the point where the owner or operator accepts delivery or takes possession of the hazardous waste.

Related Documents:

Subpart BB Inspection Form	Example daily Subpart BB Inspection Form
Subpart BB Leak Detection and Repair Form	Example Leak Detection and Repair Form
Subpart CC Daily Inspection Form	Example Branch Daily Inspection Form (tanks and containers)
Subpart CC Annual Tank Inspection	Example Subpart CC Annual Tank Inspection (including difficult Subpart BB tagged fittings at tops of tanks).

Overview:

Procedures for compliance with both Subparts BB and CC are covered in the BOG.

Standards have been promulgated limiting organic emissions resulting from equipment leaks at new and existing hazardous waste treatment, storage and disposal facilities (TSDFs) requiring RCRA permit under RCRA Subtitle C.

These emission standards, set forth under 40 CFR Parts 264 and 265, Subpart BB, apply to any "leaks" from valves, pumps, compressors, pressure relief devices, sampling connection systems, flanges or other pipe connectors, control devices, and open-ended valves or lines that may result in organic emissions. Controls for these sources are required at TSDFs where the equipment contains or comes in contact with hazardous waste streams with 10 percent or greater organics content (by weight).

Subpart CC regulations require owners and operators of tanks, container, surface impoundments, and miscellaneous units to limit VOC emissions from these units by providing covers and emission control devices.

Tanks Subject to Subpart CC: Any tank that is used to store or treat hazardous waste with a VO concentration 100 ppmw or greater.

Containers Subject to Subpart CC: Containers with design volume of greater than 0.1 m³ (about 26 gallons) that are used to store or treat hazardous waste with a VO concentration 100 ppmw or greater.

Generators storing hazardous waste in containers and in tanks for up to 90 days are also subject to the Subpart CC regulations. Satellite accumulation drums of less than 55 gallons are not subject to Subpart CC.

Procedures:

Subpart BB

- Each piece of equipment in waste service, such as pumps, valves, flanges (includes flanges located at either end of a valve), compressors, other connectors (any threaded fitting), open-ended lines, and flanged manway covers must be marked (tagged) such that they are easily distinguished from other pieces of equipment (numbered).

Note: Zip ties (nylock ties) are not acceptable for attaching Subpart BB ID tags to equipment. Subpart BB ID tags **must** be attached to equipment using a stainless steel wire which can be ordered from MSC (**MSC #93536928**). All Subpart BB equipment ID tags currently attached to equipment by something other than a stainless steel wire need to be replaced immediately.

- Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve which seals the open end at all times except when hazardous waste flows through the open-ended valve or line. **Note:** Any cover to an open-ended valve must be marked (tagged/number).
- Drawings to show location of each piece of equipment and corresponding tag/number must be current and maintained in the EHS file. **Note:** Notify EHS Manager if tags or equipment are added or removed.
- List numbers for valves (threaded fittings) that are designated as unsafe-to monitor or difficult-to-monitor. Provide an explanation of why these threaded fittings are unsafe or difficult to monitor on a daily basis and when they are inspected. (Example: Tagged equipment on top of vertical tank(s) is inspected annually in conjunction with the Subpart CC inspection. See Subpart CC section of this BOG)
- Each tagged piece of equipment must be visually inspected during daily inspections. If a leak is noticed, it must be noted on the daily inspection log for that day.
- If pieces of equipment are found to be leaking:
 - Note the leaking equipment on the daily inspection form (circle "N" and note the tag number at the bottom of the inspection sheet)
 - Tag the leaking equipment with a weatherproof tag.
 - Complete the Leak Detection and Repair form with the required information. Record the status of repairs on this form.
 - The first attempt to repair the leak must be done in 5 calendar days from the time the leak was noted on the daily inspection sheet.

- The leak must be repaired with 15 calendar days of detecting a leak or the equipment must be taken out of service. **Note:** Contact BGM and EHS Manager if it appears that repairs cannot be made within the 15 days.
- If repairs are not made within 15 calendar days or taken out of service, the EHS Manager must submit a semi-annual report to the Regional Administrator describing the situation.
- Remove the weatherproof tag when repairs are finished.
- All activities to repair a leak must be recorded on a Leak Detection and Repair form.
- The actual vapor pressure must be maintained in the operating record (EHS 999 file cabinet) to show that the equipment is in heavy liquid service. **Note:** EHS Manager will make sure this information is current, in the EHS 999 file, and available for inspection.

Subpart CC

- The facility operating record must identify all hazardous waste storage tanks for Subpart CC compliance (including 90 day tanks), drum storage areas and transfer operations, such as drum emptying and truck stations, as applicable units.

Note: This information can be found in Part B Permit Application, but must be in EHS 999 file and available for inspection

- Hazardous waste storage tanks must be classified as Level 1 or Level 2 tanks based on the above referenced definitions.

Note: Most branch storage tanks are classified as Level 1 tanks. Therefore, the following procedures address Level 1 tanks.

- Vapor pressure of the waste in the tank(s) must be available for inspection (see EHS 999 files).
- Tanks must be equipped with covers, and all cover openings are kept closed except when sampling, adding or removing waste materials.

Note: Due to SK policy which requires the use of 55-gallon drums for accumulation of site generated wastes, all satellite accumulation containers of return and fill/dock wastes are subject to this requirement.

Note: In states that consider the drum washer(s) as Level 1 tanks, the drum washer(s) lid must be closed when drum washing operations are being conducted and when not in use if materials are present in the unit (exception being when wastes are being added or removed from the equipment), and be equipped with proper seals on the lid to control emissions.

- Annual inspections must be conducted on all tanks' covers and all tank openings, such as manhole covers, pressure relief devices, conservation vents and long bolted manways.

Note: If visible holes or gaps are noted in the inspection: Repair documentation must indicate the first attempt at repair was performed within 5 days and repairs must be completed within 45 days of discovery unless repair cannot be conducted without emptying the tank or taking it out of service and no alternative tank capacity is available. In such instances, a tank must be repaired the next time it stops operation and the repair must be completed before placing the tank back into service (Note: see EHS Manager for additional guidance if repair cannot be completed within 45 days of detecting a leak. Some permits or other regulatory requirements may not allow the continued operation of a tank beyond 45 days after discovering a defect. Severe leaks will require immediate action and may require the tank to be removed from service immediately, and repair certified by an independent Professional Engineer).

- An inspection of the top of the tank(s) must be conducted annually. The findings must be documented.

Branches with vertical waste tank(s): Due to the difficult location of the Subpart BB tags for the threaded fittings at the top of these tank(s), daily inspection of these fittings is not possible. Therefore, in conjunction with the annual Subpart CC inspection, these tagged fittings will be inspected. The documentation of the Subpart CC annual tank inspection will also reference the tag numbers for the fittings located at the top of the tank and whether leaks were noted or not.

ATTACHEMENT A – Example Subpart BB Inspection Form

Page 3 of 3

INSPECTION LOG SHEET FOR:
Daily Inspection of TANK EQUIPMENT

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE: (M/D/Y)

TIME	Pump, Flange, or Valve Number		MON.	TUES.	WED.	THURS.	FRI.
	1	_____	A N	A N	A N	A N	A N
	2	_____	A N	A N	A N	A N	A N
	3	_____	A N	A N	A N	A N	A N
	4	_____	A N	A N	A N	A N	A N
	5	_____	A N	A N	A N	A N	A N
	6	_____	A N	A N	A N	A N	A N
	7	_____	A N	A N	A N	A N	A N
	8	_____	A N	A N	A N	A N	A N
	9	_____	A N	A N	A N	A N	A N
	10	_____	A N	A N	A N	A N	A N
	11	_____	A N	A N	A N	A N	A N
	12	_____	A N	A N	A N	A N	A N
	13	_____	A N	A N	A N	A N	A N
	14	_____	A N	A N	A N	A N	A N
	15	_____	A N	A N	A N	A N	A N
	16	_____	A N	A N	A N	A N	A N
	17	_____	A N	A N	A N	A N	A N
	18	_____	A N	A N	A N	A N	A N
	19	_____	A N	A N	A N	A N	A N
	20	_____	A N	A N	A N	A N	A N
	21	_____	A N	A N	A N	A N	A N
	22	_____	A N	A N	A N	A N	A N
	23	_____	A N	A N	A N	A N	A N
	24	_____	A N	A N	A N	A N	A N
	25	_____	A N	A N	A N	A N	A N
	26	_____	A N	A N	A N	A N	A N
	27	_____	A N	A N	A N	A N	A N
	28	_____	A N	A N	A N	A N	A N
	29	_____	A N	A N	A N	A N	A N
	30	_____	A N	A N	A N	A N	A N
	31	_____	A N	A N	A N	A N	A N
	32	_____	A N	A N	A N	A N	A N
	33	_____	A N	A N	A N	A N	A N
	34	_____	A N	A N	A N	A N	A N
	35	_____	A N	A N	A N	A N	A N
	36	_____	A N	A N	A N	A N	A N
	37	_____	A N	A N	A N	A N	A N
	38	_____	A N	A N	A N	A N	A N
	39	_____	A N	A N	A N	A N	A N
	40	_____	A N	A N	A N	A N	A N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leak, active leak, sticking, wear, does not operate smoothly, other: _____

For all leaks and potential leaks, the Leak Detection and Repair Record must be completed.

*Add short descriptions of unit being inspected (e.g. gate valve, dumpster flange, dumpster pump, etc.)

**A = Acceptable N = Not Acceptable

Draw a line through rows and pump I.D. numbers which do not apply.

Form 1000-00

ATTACHMENT B – Example Subpart BB Leak Detection and Repair Form

LEAK DETECTION AND REPAIR RECORD

EQUIPMENT I.D. # _____ BRANCH# _____
 DESCRIPTION _____
 TANK SYSTEM _____

	<u>DATE</u>	<u>INSPECTOR'S SIGNATURE</u>
HOW WAS POTENTIAL OR ACTUAL LEAK DETECTED? _____	_____	_____

DESCRIBE THE POTENTIAL OR
ACTUAL LEAK: _____

INSTRUMENT MONITORING WITHIN
FIVE DAYS

(1.) RESULTS _____

REPAIR ATTEMPT
METHOD _____

(2.) RESULTS _____

REPAIR ATTEMPT
METHOD _____

(3.) RESULTS _____

DATE OF SUCCESSFUL REPAIR
(must be completed w/in 15 days)

METHOD _____
 (4.) RESULTS _____

FOLLOWUP MONTHLY MONITORING FOR VALVES

(5.) RESULTS _____

(6.) RESULTS _____

MONITORING SUMMARY

	(REFERENCE NUMBER - SEE ABOVE)					
	(1)	(2)	(3)	(4)	(5)	(6)
INSTRUMENT #/OPERATOR	_____	_____	_____	_____	_____	_____
CALIBRATION	_____	_____	_____	_____	_____	_____
BACKGROUND READING	_____	_____	_____	_____	_____	_____
READING AT EQUIPMENT	_____	_____	_____	_____	_____	_____
LEAK DETECTED?	_____	_____	_____	_____	_____	_____

ATTACH ANY DOCUMENTATION PREPARED BY THE CONSULTANT

Procedure for Compliance with RCRA Subparts BB and CC

ATTACHMENT C – Example Subpart CC Daily Inspection Form Page 1 of 3

INSPECTION LOG SHEET FOR: Daily Inspection of STORAGE TANK SYSTEM

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

	MON.	TUES.	WED.	THURS.	FRI.
TRANSFER PUMPS AND HOSES					
Pump Seals:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, other: _____					
Motors:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: overhauling, other: _____					
Fittings:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, other: _____					
Valves:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, sticking, other: _____					
Loss Connections and Fittings:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: cracked, loose, leaks, other: _____					
Loss Body:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: crushed, thin spots, leaks, other: _____					

RETURN AND FILL STATION

Ret Dispenser:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, other: _____					
Secondary Containment:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: sediment/liquid, leaks, deterioration, distortion, excess debris, other: _____					
Loading/Unloading Area:	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: cracks, ponding/wet spots, deterioration, other: _____					

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

A – Acceptable N – Not Acceptable

IF AN ITEM IS NOT APPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE "ACCEPTABLE/NOT ACCEPTABLE" ROW

ATTACHMENT C – Example Subpart CC Daily Inspection Form Page 2 of 3

**INSPECTION LOG SHEET FOR
Daily Inspection of STORAGE TANK SYSTEM**

(A separate log must be completed for each tankfarm which contains a hazardous waste storage tank.)

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE (M/D/Y): _____

TIME _____

STORAGE TANKS:

TANKS MUST NEVER BE MORE THAN 80% FULL:

	MON.	TUES.	WED.	THURS.	FRI.
* Tank [in]	/	/	/	/	/
Tank [in liquid]	/	/	/	/	/

Tank Exterior:

A** N A N A N A N A N

If "N", circle appropriate problem: rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other: _____

High Level Alarms:

A N A N A N A N A N

If "N", circle appropriate problem: malfunctioning "Power On" light, malfunctioning alarm/stroke light, other: _____

Volume Gauges:

A N A N A N A N A N

If "N", circle appropriate problem: disconnected, sticking, condensation, other: _____

CONTAINMENT AREA (Tank Dike)

Any material which spills, leaks or otherwise accumulates in the dike, including rainwater, must be completely removed within 24 hours.

Bottom and Walls:

A N A N A N A N A N

If "N", circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots, stains, sealant is pitted, cracked, chipped, deterioration, displacement, leaks, other: _____

Rigid Piping and Supports:

A N A N A N A N A N

If "N", circle appropriate problem: distortion, corrosion, paint failure, leaks, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE"

*Fill in the Waste Type (e.g. Mineral Spirits)

**A = Acceptable

N = Not Acceptable

If an item is not applicable, enter "N/A" after it and draw a line through the acceptable/not acceptable row.

ATTACHMENT C – Example Subpart CC Daily Inspection Form Page 3 of 3

Daily Inspection of CONTAINER STORAGE AREA
(A separate log must be completed for each storage area.)

DESCRIPTION OF AREA (e.g., metal shelter, northeast corner of warehouse, etc.) _____

PERMITTED STORAGE VOLUME _____

SPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
_____	_____	_____	_____	_____

DATE: M / D / Y

CONTAINERS	MON.	TUES.	WED.	THURS.	FRI.
Total Volume* of _____ "waste":					
Total Volume of _____ "waste":					
Total Volume of _____ "waste":					
Total Volume of _____ "waste":					
Total Volume of _____ "waste":					
TOTAL VOLUME (IN GALLONS)					
	A** N	A N	A N	A N	A N

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted.

other: _____

Condition of Containers: A N A N A N A N A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion,

other: _____

Stacking/Placement/Aisle Space: A N A N A N A N A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged pallets, other: _____

CONTAINMENT

Sealing, Floor and Sumps: A N A N A N A N A N

Any material which spills, leaks or otherwise accumulates in the secondary containment must be completely removed within 24 hours of being discovered.

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant, other: _____

Loading/Unloading Area: A N A N A N A N A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

When calculating total volumes, assume the containers are full.

* Enter a short description of the waste (e.g., H.S., I.C., paint, etc.)

** A = Acceptable N = Not Acceptable

† AN ITEM IS NOT APPLICABLE ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW

