

ATTACHMENT 3

ANALYSIS PLAN

**Background:**

CBI's Miami Wastewater Pre-Treatment Facility is approved by the State of Florida to accept and treat multiple waste streams. This plan is put in place to ensure the Facility remains in compliance with applicable permits, local ordinances and EPA mandates.

**Purpose:**

The purpose of this plan is to identify the various waste streams that may be accepted into the CBI Miami Facility and define the testing criteria for each.

**Discussion**

This Analysis Plan, coupled with the Waste Acceptance Plan, will ensure compliance of the facility by detailing the minimum testing requirements for all waste received into the facility. The Analysis Plan covers the following waste streams: Used oil, Petroleum Contact Water (PCW), Grit trap/Sump waste, EPA Sub Category (A) Metals, EPA Sub Category (B) Oils, EPA Sub Category (C) Organics and NON Hazardous Solids. The Analysis Plan covers: liquids, solids and semi solids waste streams to ensure compliance for the acceptance and treatability standards. The Miami Facility uses best treatment practices coupled with the waste analysis protocols to ensure compliance.

The following waste streams may be accepted into the Miami Facility for processing:

- Used Oil
- PCW
- Grit Trap/Sump Waste
- EPA Subcategory (A) Metals
- EPA Subcategory (B) oils
- EPA Sub Category (C) Organics
- Non Hazardous solids

## General Comment

A hazardous waste determination will be conducted on any oily wastes or sludge generated at the facility that cannot be managed for energy recovery. The materials will be managed in accordance with 40 CFR Part 279.10(c) and (e).

## Used Oil

A Representative sample of the used oil will be collected and brought to the lab for the following tests to be performed prior to offloading of the waste or by product. The lab will perform water by distillation, treatability, halogens, Flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile, the used oil load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the Facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales Manager or the generator directly to discuss the problem with acceptance of the waste stream. If (after discussion) it is deemed that the facility cannot treat and process the waste stream, the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. All used oil streams must meet the used oil specs designated by EPA for Used oil. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capability of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

## PCW

A representative sample of the PCW will be collected and brought to the lab for the following tests to be performed prior to offloading. The lab will perform water by distillation and treatability tests. After all testing has been performed to ensure that it meets the approved profile, the PCW load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the Facility. All loads not meeting the profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales Manager or the generator directly to discuss the problem with the acceptance of the waste stream. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capability of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

## **Grit Trap/Sump Waste**

A representative sample of the grit trap/sump waste will be collected and brought to the lab for the following tests to be performed prior to offloading the waste stream. The lab will perform treatability, metals, and percent solids tests. After all testing has been performed to ensure that it meets the approved profile, the load will be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the Sales Manager or the generator directly to discuss the problem with the acceptance of the waste stream. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capability of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected

## **EPA Sub Category (A) Metals**

A representative sample of the EPA Sub Category (A) waste stream will be collected and brought to the lab for the following tests to be performed prior to offloading of the waste stream. The lab will perform treatability, metals, and percent solids tests. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capability of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

## **EPA Sub Category (B) Oils**

A representative sample of the Sub Category (b) oils will be collected and brought to the lab for the following tests to be performed prior to offloading of the waste stream. The Lab Manager will perform water by distillation, treatability, halogens tests and a flash point, solids content and PCB scan when applicable. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. All used oil streams must meet the used oil specs designated by

EPA for Used Oil. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capability of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

### **EPA Sub category (C) Organics**

A representative sample of the Sub Category (C) Organics will be collected and brought to the lab for the following tests to be performed prior to offloading of the load. The Lab Manager will perform metals, treatability, and solids content tests. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capability of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

### **Non hazardous Solids**

All drums will be opened and inspected to meet all profile criteria. If the waste meets all the profile's criteria then it will be disposed of in a proper manner. If any waste does not meet profile criteria and it may cause a problem from compliance or health & safety criteria, then the Sales Manager and Disposal Manager will be contacted immediately for an alternate solution for the waste. The drummed waste will be rejected and sent off-site for alternative waste disposal. All drums will be inspected on arrival at the facility. They will be segregated and stored until time of disposal.

### **Summary**

This waste Analysis Plan shall be followed as described. This plan sets the criteria for testing waste coming into the Miami Facility to ensure compliance. Only the President or Executive V.P. of Cliff Berry Inc. has authorization to alter or change the acceptance criteria prescribed above. Any employee who does not adhere to the specific acceptance criteria detailed in this plan will be subject to termination. The plan may be changed upon EPA, State or local rule changes for acceptance of waste. Annually, the Disposal Services Dept. Manager together with the Facility Manager will review this plan to ensure that this waste analysis program is being followed and it continues to reflect the standards needed to ensure the Facility remains compliant. Any changes to this plan will be provided to senior staff, all field managers and sales personnel.