FACILITY SAFTEY KLEEN CORPORATION
I.D. NUMBER FLD 980 847 271
PATS NUMBER HC29-210802
TYPE OF APPLICATION TANK CONSTRUCTION
DATE 5-4-92
REVIEWER W.C. CRAWFORD

SUBMITTALS	REF. NO	DATE	REVIEWER
Application	1	3-23-92	CRAWFORD
	2		
	3		

REF. NO	PAGE	17-30.401(2) Part I §270.13	COMP.	INCOMP.	COMMENTS
1	11	A. GENERAL INFORMATION A-1 TYPE OF FACILITY §270.13(a)	✓		STORAGE - TANKS
	11	A-2 TYPE OF APPLICATION	✓		CONSTRUCTION
	11	A-3 DATE OPERATION BEGAN §270.13(g)	✓		NA ESTIMATED 6-92
	11	A-4 FACILITY NAME §270.13(b)	✓		Saftey Kleen - Corp 3-163-01
	11	A-5 EPA/DER I.D. NUMBER	✓		FLD 980 847 271
	11	A-6 FACILITY LOCATION §270.13(b)	✗	✗	5309 24th Ave (TAMIA) FL BRANDON ?
	11	A-7 FACILITY MAILING ADDRESS §270.13(b)	✓	✓	SHOULD be 777 Big Timber Road Elgin, ILL 60123
	11	A-8 FACILITY CONTACT NAME PHONE TITLE ADDRESS	✓		Victor San Agustin 813-682-8094 Environmental Eng 777 Big Timber Road. Elgin ILL 60123
	11	A-9 OPERATOR'S NAME §270.13(d)	✓		Saftey Kleen Corporation
		A-10 OPERATOR'S ADDRESS §270.13(d)	✓		777 Big Timber Road. Elgin ILL

PERM 30-1-88

FACILITY Safety Kleen Corp FEDERAL I.D. NO. FED 980 847 271 PATS NO. HL29-210802

REF. NO	PAGE	17-30.401(2) Part I	COMP.	INCOMP.	COMMENTS
	11	A-11 FACILITY OWNER'S NAME §270.13(e)	✓		Scott Fore ~~Owners Name~~
	12	A-12 FACILITY OWNER'S ADDRESS §270.13(e)	✓		777 Big Timber Road, Elgin ILL
	12	A-13 LEGAL STRUCTURE A-14 COUNTY-STATE REGISTRATION	✓		Corporation
	12	A-15 STATE OF INCORPORATION	✓		Wisconsin
	12	A-16 PARTNERSHIP OWNERS NAMES ADDRESS	✓		NA
	12	A-17 SITE OWNERSHIP STATUS LAND OWNER'S LAND OWNER'S ADDRESS	✓		Owned ~~Owned~~ Scott Fore 777 Big Timber Road, Elgin ILL 60123
	13	A-18 ENGINEER NAME REGISTRATION NUMBER ADDRESS ASSOCIATION	✓		Fred W. Blickle, III 39409 4730 N.W. Boca Raton Blvd, Boca Raton, Fl 33431 Blasland, Bouck, Lee
	13	A-19 INDIAN LAND §270.13(f)	—		No
	13	A-20 EXISTING ENVIRONMENTAL PERMITS §270.13(k)	✓		H029-15-8020 RCRA OPERATING
	13	B. SITE INFORMATION B-1 FACILITY LOCATION COUNTY §270.13(b) NEAREST COMMUNITY LATITUDE LONGITUDE	✓ ✓ ✓ ✓		Hillsborough TAMPA 27°55'21" N 82°23'04" W

FACILITY Safety Kleen FEDERAL I.D. NO. FLD 980 847 271 PATS NO. HC29-210802 PAGE 3 OF 3

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	13	B-2 AREA OF FACILITY SITE	✓		3 acres
	13	B-3 SCALE DRAWING AND PHOTOGRAPHS §270.13(h)	✓		attachment I.B. 3
		B-4 TOPOGRAPHIC MAP §270.13(1)			
		MAP SCALE AND DATE	✓		1" = 2000 ft 1981
		100- YEAR FLOODPLAIN AREA	✓		Figure 1.B.4-2
		ORIENTATION OF THE MAP	✓		
		SURFACE WATER BODIES WITHIN 1/4 MILE OF THE FACILITY PROPERTY BOUNDARY	✓		NONE
		SURROUNDING LAND USES	✓		Figure 1.B.4-3
		LEGAL BOUNDARIES OF THE FACILITY	✓		Figure 1.B.4-4
		INJECTION WELLS	✓		NONE on facility -
		DRINKING WATER WELLS	✓		TABLES 1.B.4-1 and TABLES 1.B.4-2
		INTAKE AND DISCHARGE STRUCTURES	✓		NONE
	13	B-5 FLOOD PLAIN	—		No ATTACHMENT I.B.4
		C. LAND USE INFORMATION			
	14	C-1 ZONING	✓		Light Industrial
	14	C-2 ZONING CHANGES	✓		NA
	14	C-3 PRESENT LAND	✓		
	14	D OPERATING INFORMATION			
	~~14~~	D-1 WASTE GENERATED ON SITE §270.13(c)	✓		SIC 7389, 5084, 5172, 5013
	14	D-2 DESCRIPTION OF OPERATION §§270.13(i) and (m)			ATTACHMENT I.D.2
		D-3 PROCESS CODE §270.13(j)			
		DESIGN CAPACITY AND UNITS	✓		900 gpd
	14	EPA HAZARDOUS WASTE NUMBER	✓		
		ANNUAL QUANTITY AND UNITS	✓		

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APPLICATION	1	3-23-92	CRAWFORD
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REF. NO	PAGE	17-30.401(2) Part II - A - GENERAL §270.14	COMP.	INCOMP.	COMMENTS
1	15	1 A. TOPAGRAPHIC MAP 1" TO 200' §270.14(b)(19)			ATTACHMENT II A.1(a)
		MAP SCALE AND DATE	✓		
		100 - YEAR FLOODPLAIN AREA	✓		Figure II.A.1(a)-1
		ORIENTATION OF THE MAP	✓		
		ACCESS CONTROL	✓		Figure II.A.1(a)-2
		INJECTION AND WITHDRAWAL WELLS			
		BUILDING AND OTHER STRUCTURES	✓		Figure II.A.1(a)-2
		CONTOURS	✓		Figure II.A.1(a)-6
		LOADING AND UNLOADING AREAS	✓		Figure II.A.1(a)-4
		DRAINAGE OR FLOOD CONTROL	✓		Figure II.A.1(a)-6
		RUNOFF CONTROL SYSTEM	✓		Figure II.A.1(a)-6
		LOCATION OF TSD AREAS	✓		Figure II.A.1(a)-5
		PAST, PRESENT, FUTURE			
		LOCATION OF SOLID WASTE MANAGEMENT UNITS	✓		Figure II.A.1(a)-6
	15	B. WIND POSE	✓		ATTACHMENT II.A.1(b)
		WIND SPEED	✓		
		DIRECTION	✓		
		LEGEND	✓		
		DATE	✓		1998 - 1978 data
	15	C. TRAFFIC PATTERNS §270.14(b)(10)			ATTACHMENT II.A.1(c)
		VOLUME			
		PATTERN	✓		Figure II A.1(c)-1
		CONTROL	✓		
		ACCESS ROADS LOAD			
		- BEARING CAPACITY ROAD SURFACES	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	15	2 FINANCIAL RESPONSIBILITY INFORMATION CALL TALLAHASSEE TO GET INFORMATION ON COMPLETENESS OF FINANCIAL.			ATTACHMENT II.A.2
	16	3 FLOOD MAP §270.14(b)(11) DOCUMENTATION OF WHETHER OR NOT THE FACILITY IS LOCATED WITH A 100-YR FLOODPLAIN INCLUDING THE SOURCE OF DATA (FEDERAL INSURANCE ADMINISTRATION MAP OR OTHER MAPS AND CALCULATIONS). IF MAP OTHER THAN FIA MAP IS USED DEMONSTRATION OF EQUIVALENT MAPPING TECHNIQUE SHOULD BE PROVIDED. IF LOCATED IN 100-YR FLOODPLAIN INCLUDE: ° 100-YR FLOODPLAIN LEVEL ° OTHER SPECIAL FLOODING FACTORS (E.G., WAVE ACTION) THAT MUST BE CONSIDERED TO PREVENT WASHOUT. DEMONSTRATION OF COMPLIANCE FOR FACILITIES LOCATED WITHIN THE 100-YR FLOOD-PLAIN, A DESCRIPTION OF HOW THE FACILITY IS DESIGNED, CONSTRUCTED, OPERATED, AND MAINTAINED TO PREVENT WASHOUT OF ANY HAZARDOUS WASTE DURING A FLOOD. EITHER OF THE FOLLOWING MAY BE USED: FLOOD PROOFING AND FLOOD PROTECTION A STRUCTURAL OR OTHER ENGINEERING STUDY SHOWING HOW DESIGN OF HAZARDOUS WASTE UNITS AND THE FLOOD PROOFING AND PROTECTION DEVICES AT THE FACILITY WILL PREVENT WASHOUT INCLUDING:	✓		ATTACHMENT II.A.3 NA

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		° ENGINEERING ANALYSIS OF HYDRODYNAMIC AND HYDROSTATIC FORCES ° STRUCTURAL OR OTHER ENGINEERING STUDIES OF HAZARDOUS WASTE UNITS AND FLOOD PROTECTION DEVICES. FLOOD PLAIN DESCRIPTION OF THE PROCEDURES TO BE FOLLOWED TO REMOVE HAZARDOUS WASTE TO SAFETY BEFORE THE FACILITY IS FLOODED. THE PLAN MUST ADDRESS THE FOLLOWING: ° TIMING RELATED TO FLOOD LEVELS ° ESTIMATED TIME TO MOVE THE WASTE ° DESCRIPTION OF THE LOCATION TO WHICH THE WASTE WILL BE MOVED MOVED AND PROOF OF THE RECEIVING FACILITY'S ELIGIBILITY TO RECEIVE HAZARDOUS WASTE ° PROCEDURES, EQUIPMENT, AND PERSONNEL TO BE USED AND THE MEANS TO ENSURE THAT THESE RESOURCES WILL BE AVAILABLE ° POTENTIAL FOR ACCIDENTAL DISCHARGE OF THE WASTE.			NA
	17	4 FACILITY SECURITY INFORMATION a) DESCRIPTION OF SECURITY §§264.14 and 270.14(b)(4) SECURITY PROCEDURES AND EQUIPMENT UNLESS A WAIVER IS GRANTED, THE FACILITY MUST DEMONSTRATE THE FOLLOWING: 24-HOUR SURVEILLANCE SYSTEM §264.14(b)(1) A 24-HOUR SURVEILLANCE SYSTEM THAT CONTINUOUSLY MONITORS AND CONTROLS ENTRY ONTO THE ACTIVE PORTION OF THE FACILITY (e.g., TELEVISION MONITORING OR SURVEILLANCE BY		✓	attachment II. A. 4(a) The security procedures describe the security of the container storage area, and are not descriptive of the tank storage area.

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	17	GUARDS OR FACILITY PERSONNEL); OR BARRIER AND MEANS TO CONTROL ENTRY BARRIER §264.14(b)(2)(i) AN ARTIFICIAL OR NATURAL BARRIER THAT COMPLETELY SURROUNDS THE ACTIVE PORTION OF THE FACILITY; HEIGHT OF FENCE MATERIAL OF CONSTRUCTION AND MEANS TO CONTROL ENTRY §264.14(b)(2)(ii) A MEANS TO CONTROL ENTRY, AT ALL TIMES, THROUGH THE GATES OR OTHER ENTRANCES TO THE ACTIVE PORTION OF THE FACILITY (e.g., AN ATTENDANT, TELEVISION MONITORS, LOCKED ENTRANCE, OR CONTROLLED ROADWAY ACCESS TO THE FACILITY.)		✓	chain link fence mentioned - height and material of construction not identified gates and doors are ~~discussed~~ mentioned
		WARNING SIGNS §264.14(c) THE FACILITY MUST HAVE A SIGN WITH THE LEGEND "DANGER- UNAUTHORIZED PERSONNEL KEEP OUT", WHICH MUST BE POSTED AT EACH ENTRANCE TO THE ACTIVE PORTION OF THE FACILITY AND AT OTHER LOCATIONS, IN SUFFICIENT NUMBERS TO BE SEEN FROM ANY APPROACH TO THIS ACTIVE PORTION. THE LEGEND MUST BE LEGIBLE FROM A DISTANCE OF AT LEAST 25 FT. EXISTING SIGNS WITH A LEGEND OTHER THAN "DANGER- UNAUTHORIZED PERSONNEL KEEP OUT" MAY BE USED IF THE LEGEND ON THE SIGN INDICATES THAT ONLY AUTHORIZED PERSONNEL ARE ALLOWED TO ENTER THE ACTIVE	✓		attachment II-A.4(a)

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		PORTION AND THAT ENTRY ONTO THE WAIVER ACTIVE PORTION CAN BE DANGEROUS.			
		IF A WAIVER OF THESE REQUIREMENTS IS REQUESTED, THE OWNER OR OPERATOR MUST DEMONSTRATE THE FOLLOWING: INJURY TO INTRUDER §264.14(a)(1) PHYSICAL CONTACT WITH THE WASTE, STRUCTURE, OR EQUIPMENT WITHIN THE ACTIVE PORTION OF THE FACILITY WILL NOT INJURE UNKNOWNING OR UNAUTHORIZED PERSONS OR LIVESTOCK THAT MAY ENTER THE ACTIVE PORTION OF A FACILITY AND VIOLATION CAUSED BY INTRUDER §264.14(a)(2) DISTURBANCE OF THE WASTE OR EQUIPMENT BY THE UNKNOWING OR UNAUTHKORIZED ENTRY OF PERSONS OR LIVESTOCK ONTO THE ACTIVE PORTION OF A FACILITY WILL NOT CAUSE A VIOLATION OF THE REQUIRMENTS OF §264.			NA
	17	b) CONTINGENCY PLAN §§264 SUBPART D AND 270.14(b)(7) A COPY OF THE CONTINGENCY PLAN OR SPILL PREVENTION CONTROL AND COUNTER MEASURES (SPCC) PLAN AMENDED FOR HAZARDOUS WASTE MANAGEMENT TO DESCRIBE THE ACTIONS FACILITY PERSONNEL WILL TAKE IN RESPONSE TO FIRES, EXPLOSIONS, OR ANY UNPLANNED SUDDEN OR NONSUDDEN RELEASE OF HAZARDOUS WASTE OR HAZARDOUS WASTE			Attachment II.A.4(b)

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1	17	CONSTITUENTS TO AIR, SOIL, SURFACE WATER, OR GROUND WATER AT THE FACILITY.			
		GENERAL INFORMATION §§264.52 AND .53 FACILITY NAME AND LOCATION OWNER OR OPERATOR NAME SITE PLAN DESCRIPTION OF FACILITY OPERATIONS	✓ ✓	✓ ✓	The Contigency plan does not identify the facility location. facility name, location, telephone # The information on this page should operate be identified on the cover page II.A.4(b)1
		EMERGENCY COORDINATORS §§264.52(d) AND .55 NAMES, ADDRESSES, OFFICE AND HOME PHONE NUMBERS, AND DUTIES OF PRIMARY AND ALTERNATE COORDINATES A STATEMENT AUTHORIZING DESIGNATED COORDINATORS TO COMMIT THE NECESARY RESOURCES TO IMPLEMENT THE CONTINGENCY PLAN	✓ ✓		Page II.A.4(b)-3 ~~Page~~ Table II A.4.(b)-1 This information should be added FDEM 5PM → 8AM M-F 24 S/S SW FDER 8:00Am - 5Pm M-F
		IMPLEMENTATION §§264.52(a) & 264.56(d) CRITERIA FOR IMPLEMENTATION OF CONTINGENCY PLAN FOR ANY POTENTIAL EMERGENCY.	✓		Page II.A.4(b)-1
		EMERGENCY RESPONSE PROCEDURES §§264.56(a)&(d) NOTIFICATION METHODOLOGY FOR IMMEDIATE NOTIFICATION OF FACILITY PERSONNEL AND NECESSARY STATE OR LOCAL AGENCIES.	✓		Verbal blowing of car phone
		IDENTIFICATION OF HAZARDOUS MATERIALS §264.56(b) AVAILABLE DATA AND/ OR PROCEDURES FOR IDENTIFICATION OF HAZARDOUS MATERIALS INVOLVED IN THE EMERGENCY AND QUANTITY AND AREAL EXTENT OF RELEASE. INCLUDE INFORMATION ON: BIOLOGICAL, PHYSICAL, AND	✓		II.A.4(b)-2 and Appendix A

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		CHEMICAL PROPERTIES OF THE WASTE EXACT SOURCE AMOUNT AREAL EXTENT OF RELEASE	✓		Page II.A.4(b)-3
		HAZARD ASSESSMENT §264.56(c) &(d) PROCEDURE FOR ASSESSMENT OF POSSIBLE HAZARDS TO THE ENVIRONMENT AND HUMAN HEALTH PROCEDURE FOR DETERMINING THE NEED FOR EVACUATION AND NOTIFICATION OF AUTHORITIES.	✓		Page II.A.4(b)-3 and 4
		CONTROL PROCEDURES §264.52(a) SPECIFIC RESPONSES AND CONTROL PROCEDURES TO BE TAKEN IN THE EVENT OF A FIRE, EXPLOSION, OR RELEASE OF HAZARDOUS WASTE TO AIR, LAND, OR WATER, INCLUDING PROCEDURES FOR RAPIDLY STOPPING WASTE FEED.		✓	Spill Procedures - Page II.A.4(b)-7 Potential spills does not address truck to tank transfers or tank to truck transfers.
		PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES § 264.56(e) DURING AN EMERGENCY SITUATION, A DESCRIPTION OF THE NECESSARY STEPS TO BE TAKEN TO ENSURE THAT FIRES, EXPLOSIONS, OR RELEASES DO NOT OCCUR, RECUR, OR SPREAD TO OTHER HAZARDOUS WASTE AT THE FACILITY. STEPS SHOULD INCLUDE: SHUT-DOWN OF PROCESSES AND	✓		II.A.4(b)-5 The application states that the E.C. must take the steps necessary to do this, but does not describe the necessary steps.

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		CONTINUED MONITORING OF THEM			
		COLLECTING, CONTAINING AND TREATING RELEASED WASTED	✓		
		REMOVING AND ISOLATING CONTAINERS	✓		
		AND			
		PROPER USE OF FIRE CONTROL STRUCTURES (e.g. FIRE DOORS), SYSTEMS (e.g. SPRINKLER SYSTEMS), AND EQUIPMENT (e.g. EXTINGUISHERS)	✓		II.A.4(b)-11 No Fire Doors only roll up No Sprinkler System
		STORAGE AND TREATMENT OF RELEASED MATERIAL §264.56(g)			
		PROVISION FOR TREATMENT, STORAGE, OR DISPOSAL OF ANY HAZARDOUS WASTE RESULTING FROM A RELEASE, FIRE, OR EXPLOSION AT THE FACILITY		✓	II.A.4(b)-5 STATES E.C. MUST DO THIS does not describe how he will accomplish this responsibility
		EQUIPMENT AVAILABLE AND LOCATION	✓		
		PROCEDURES FOR DEPLOYMENT OF THESE RESOURCES	✓		
		METHODS TO CONTAIN, TREAT, AND CLEAN UP A HAZARDOUS RELEASE AND DECONTAMINATE THE AFFECTED AREA	✓		II.A.4(b)-9
		INCOMPATIBLE WASTE §264.56(h)(1)			
		PROVISIONS FOR PREVENTION OF INCOMPATIBLE WASTE FROM BEING TREATED, STORED, OR LOCATED		✓	II.A.4(b)-9 STATE E.C. must do this does not describe how he will do it.
		THE AFFECTED AREAS UNTIL CLEANUP PROCEDURES ARE COMPLETED.			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		POST-EMERGENCY EQUIPMENT MAINTENANCE §§264.56(h)(2) and (i) PROCEDURES FOR ENSURING THAT ALL EMERGENCY EQUIPMENT LISTED IN THE CONTINGENCY PLAN IS CLEANED AND FIT FOR ITS INTENDED USE BEFORE OPERATIONS ARE RESUMED.	✓		II.A. 4(b) - 10
		SURFACE IMPOUNDMENTS SPILLS AND LEAKAGE			
		EMERGENCY EQUIPMENT §264.52(e) LOCATION, DESCRIPTION, AND CAPABILITIES OF EMERGENCY EQUIPMENT. THIS SHOULD INCLUDE: SPILL CONTROL EQUIPMENT FIRE CONTROL EQUIPMENT PERSONNEL PROTECTIVE ITEMS SUCH AS RESPIRATORS AND PROTECTIVE CLOTHING FIRST AID AND MEDICAL SUPPLIES EMERGENCY DECONTAMINATION EQUIPMENT EMERGENCY COMMUNICATION AND ALARM SYSTEMS	✓ ✓ ✓ ✓ ✓ ✓		page II.A. 4(b) - 10
		COORDINATION AGREEMENTS §§264.37 & .52(c) A DESCRIPTION OF COORDINATION AGREEMENTS WITH LOCAL POLICE AND FIRE DEPARTMENTS, HOSPITALS, CONTRACTORS, AND STATE AND LOCAL EMERGENCY RESPONSE TEAMS TO FAMILIARIZE THEM WITH THE FACILITY AND ACTIONS NEEDED IN CASE OF EMERGENCY. A STATEMENT INDICATING THAT A COPY OF THE CONTINGENCY PLAN HAS BEEN	✓		page II.A. 4(b) - 12

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		SUBMITTED TO THESE ORGANIZATIONS IF APPLICABLE, DOCUMENTATION OF REFUSAL TO ENTER INTO A COORDINATION AGREEMENT	✓		
		EVACUATION PLAN §264.52(f) THIS PLAN MUST INCLUDE: CRITERIA FOR EVACUTION A DESCRIPTION OF SIGNAL (S) TO BE USED TO BEGIN EVACUATION WITH PRIMARY AND ALTERNATE EVACUATION ROUTES, RALLY POINTS			page II.A.4(b)-12 Primary and Alternate routes are not indicated on a facility site layout.
		REQUIRED REPORTS §264.56(u) PROVISIONS FOR SUBMISSION OF REPORTS OF EMERGENCY INCIDENTS WITHIN 15 DAYS OF OCCURANCE NOTATION OF SUCH INCIDENTS IN THE OPERATING RECORD IDENTIFYING THE TIME, DATE, AND DETAILS OF THESE EMERGENCY INCIDENTS	✓ ✓		page II.A.4(b)-4, -5, -6
		C) DESCRIPTION OF PROCEDURES, STRUCTURES, OR EQUIPMENT §270.14(b)(8) A DESCRIPTION OF PROCEDURES, STRUCTURES OR EQUIPMENT USED AT THE FACILITY FOR THE FOLLOWING: PREVENTION OF HAZARDS IN UNLOADING OPERATIONS (e.g. USE OF RAMPS OR SPECIAL FORKLIFTS) PREVENTION OF RUNOFF FROM HAZARDOUS WASTE HANDLING AREAS TO OTHER AREAS OF THE FACILITY OR ENVIRONMENT, OR PREVENTION OF FLOODING (e.g., BERMS, DIKES, TRENCHES) PREVENTION OF CONTAMINATION OF	 ✓ ✓ ✓	 ✓ ✓	ATTACHMENT II.A.4(b) Page II.A.4(b)-C-8 describe potential spill activities and some measures to reduce potential. However, the discussion of tank truck to tank activities is not included and therefore a description of these activities is not complete. Additionally no discussion of reducing fire or explosion potential is provided See page II.A.4(b)-11

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		WATER SUPPLIES MITIGATION OF EFFECTS OF EQUIPMENT FAILURE AND POWER OUTAGES PREVENTION OF UNDUE EXPOSURE OF PERSONNEL TO HAZARDOUS WASTE (e.g., PROTECTIVE CLOTHING)		✓ –	
		PRECAUTIONS TO PREVENT OR IGNITION OR REACTION OF IGNITABLE FOR REACTIVE WASTE §264.17(a) A DESCRIPTION OF THE PRECAUTIONS TAKEN BY A FACILITY THAT HANDLES IGNITABLE, REACTIVE WASTE TO PREVENT ACTUAL IGNITION, INCLUDING SEPARATION FROM SOURCES OF IGNITION SUCH AS OPEN FLAMES SMOKING, FRICTIONAL HEAT, SPARKS (STATIC, ELECTRICAL OR MECHANICAL), SPONTANEOUS IGNITION (e.g., HEAT PRODUCING CHEMICAL REACTIONS), AND RADIANT HEAT. DEMONSTRATION THAT WHEN IGNITABLE OR REACTIVE WASTE IS BEING HANDLED, THE OWNER OR OPERATOR CONFINES SMOKING AND OPEN FLAMES TO SPECIALLY DESIGNATED LOCATIONS LOCATIONS. "NO SMOKING" SIGNS MUST BE CONSPICUOUSLY PLACED WHEREVER A HAZARD EXISTS FROM IGNITABLE OR REACTIVE WASTE.	✓	OFC	5-7-92 - The contingency plan does not describe the special requirements for the prevention of ignition or reaction. II.A.4(d)-9, II.A.4(d)-12
		GENERAL PRECAUTIONS FOR HANDLING IGNITABLE OR REACTIVE WASTE AND MIXING OF INCOMPATIBLE WASTE §264.17(b) A DESCRIPTION OF THE PRECAUTIONS TAKEN BY A FACILITY THAT TREATS, STORES, OR DISPOSES OF IGNITABLE OR REACTIVE WASTE AND OTHER MATERIALS,	✓		None of the chemicals are incompatible

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		TO PREVENT REACTIONS WHICH: (1) GENERATE EXTREME HEAT OR PRESSURE, FIRE OR EXPLOSIONS OR VIOLENT REACTIONS; (2) PRODUCE UNCONTROLLED FLAMMABLE FUMES, DUSTS, OR GASES IN SUFFICIENT QUANTITIES TO THREATEN HUMAN HEALTH OR THE ENVIRONMENT; (3) PRODUCE UNCONTROLLED FLAMMABLE FUMES OR GASES IN SUFFICIENT QUANTITIES TO POSE A RISK OF FIRE OR EXPLOSIONS; (4) DAMAGE THE STRUCTURAL INTEGRITY OF THE DEVICE OR FACILITY; OR (5) BY SIMILAR MEANS THREATEN HUMAN HEALTH OR THE ENVIRONMENT.			
		D) PREPAREDNESS AND PREVENTION PROCEDURES EQUIPMENT REQUIREMENTS §§264.32 & 270.14(b)(6) DEMONSTRATE THAT NONE OF THE HAZARDS POSED BY WASTE HANDLED AT THE FACILITY COULD REQUIRE A PARTICULAR KIND OF EQUIPMENT SPECIFIED BELOW. OR THE FACILITY MUST HAVE THE FOLLOWING EQUIPMENT:			Attachment II. A. 4(d)
		INTERNAL COMMUNICATIONS §264.32(a) AN INTERNAL COMMUNICATION OR ALARM SYSTEM CAPABLE OF PROVIDING IMMEDIATE EMERGENCY INSTRUCTION TO FACILITY PERSONNEL.		✓	page II. A. 4(d)-3 Table II. A. 4(b)-5 second page says paging system is available from office to warehouse - communication from tank to office/warehouse not mentioned
		EXTERNAL COMMUNICATIONS §264.32(b)			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		A DEVICE SUCH AS A TELEPHONE OR A HANDHELD TWO-WAY RADIO, FOR SUMMONING EMERGENCY ASSISTANCE FROM LOCAL POLICE DEPARTMENT OR STATE OR LOCAL EMERGENCY RESPONSE TEAMS.	✓		
		EMERGENCY EQUIPMENT §264.32(c) FIRE CONTROL EQUIPMENT (INCLUDING) SPECIAL EXTINGUISHING EQUIPMENT, SUCH AS THAT USING FOAM, INERT GAS, OR DRY CHEMICALS AND PORTABLE FIRE EXTINGUISHERS SPILL CONTROL EQUIPMENT DECONTAMINATION EQUIPMENT	✓		page II. A. 4 (d)-3 and table II. A. 4 (d)-2
		WATER FOR FIRE CONTROL §264.32(d) WATER AT ADEQUATE VOLUME AND PRESSUE TO SUPPLY WATER HOSE STREAMS, OR FOAM-PRODUCING EQUIPMENT, OR AUTOMATIC SPRINKLERS OR WATER SPRAY SYSTEMS	✓		water for fire fighting would be supplied by the fire department responding to a fire call
		AISLE SPACE REQUIREMENT §264.35 ADEQUATE AISLE SPACE AVAILABLE OR DEMONSTRATION THAT AISLE SPACE IS NOT NEEDED TO ALLOW THE UNOBSTRUCTED MOVEMENT OF PERSONNEL, FIRE PROTECTION EQUIPMENT, OR SPILL CONTROL EQUIPMENT TO ANY AREA OF FACILITY OPERATION IN AN EMERGENCY.	✓		
		E) PERSONNEL TRAINING §§264.16 & 270.14(b)(12) AN OUTLINE OF BOTH THE INTRODUCTORY AND CONTINUING TRAINING PROGRAMS BY OWNERS			Attachment II. A. 4 (e)

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		AND OPERATORS TO PREPARE THE PERSONNEL TO OPERATE AND MAINTAIN THE FACILITY IN A SAFE MANNER. INCLUDE A BRIEF DECRIPTION OF HOW TRAINING WILL BE DESIGNED TO MEET ACTUAL JOB TASKS. (NOTE: ON-THE-JOB TRAINING MAY BE USED TO COMPLY WITH THESE REQUIREMENTS.)			
		JOB TITLES AND DUTIES §§264.16(d)(1) & (2) FOR EACH EMPLOYEE WHOSE POSITION AT THE FACILITY IS RELATED TO HAZARDOUS WASTE MANAGEMENT INCLUDE: NAME JOB TITLE JOB DUTIES JOB DESCRIPTION	 ✓ ✓ ✓	✓	application does not state where a list of names will be maintained
		TRAINING CONTENT, FREQUENCY, AND TECHNIQUES §§264.16(d)(3) & (c) IN BOTH INTRODUCTORY AND CONTINUING TRAINING (INCLUDING AN ANNUAL REVIEW OF THE INITIAL TRAINING) FOR EACH EMPLOYEE DESCRIBE: TRAINING CONTENT FREQUENCY OF TRAINING TECHNIQUE(S) USED IN TRAINING	 ✓ ✓ ✓		page II.A.4(e)-1 and Table II.A.4(e)-1 This section has a topic outline of the ~~materials~~ to be covered in training but subjects does not identify areas within the subjects. pages II.A.4(e)-11 through 13 cover specific items
		TRAINING DIRECTOR §264.16(a)(2) DEMONSTRATION THAT THE PROGRAM IS DIRECTED BY A PERSON TRAINED IN HAZARDOUS WASTE MANAGEMENT. CREDENTIALS OF TRAINING DIRECTOR		✓	page II.A.4(e)-12 The qualifications of individuals conducting training should be at the facility after they conduct the training - additionally knowledge of contingency plan deleted
		RELEVANCE OF TRAINING TO JOB POSITION §264.16(a)(2) A BRIEF DESCRIPTION OF HOW INSTRUCTION OF FACILITY PERSONNEL IN HAZARDOUS WASTE MANAGEMENT PROCEDURES (INCLUDING	✓		page II.A.4(e)-13

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		CONTINGENCY PLAN IMPLETATION) IS RELEVANT TO THEIR POSITIONS.			
		TRAINING FOR EMERGENCY RESPONSE §264.16(a)(3) DOCUMENTATION THAT THE TRAINING PROGRAM TRAINS FACILITY PERSONNEL TO RESPOND EFFECTIVELY TO EMERGENCIES AND TRAINS THEM TO BE FAMILIAR WITH EMERGENCY PROCEDURES, AND EMERGENCY EQUIPMENT, AND EMERGENCY SYSTEMS, INCLUDE WHERE APPLICABLE: PROCEDURES FOR USING, INSPECTING, REPAIRING, AND REPLACING FACILITY EMERGENCY AND MONITORING EQUIPMENT KEY PARAMETERS FOR AUTOMATIC WASTE FEED CUTOFF SYSTEMS SOME KEY PARAMETERS INCLUDE: - TYPE OF VALVE (e.g.,DIAPHRAGM, SOLENOID, OR FUSIBLE ELEMENT) AND HOW IT BASICALLY OPERATES - WHETHER THE VALVE FAILS IN AN OPEN OR CLOSED POSITION - WHETHER THE VALVE IS PNEUMATICALLY, HYDRAULICALLY, ELECTRICALLY, OR IN THE CASE OF FUSIBLE ELEMENT, HEAT ACTIVATED - WHETHER OR NOT THERE IS A MANUAL OVERRIDE IN CASE OF VALVE FAILURE AND HOW TO MANUALLY OPERATE THE VALVE - CONDITIONS WHICH ACTIVATE WASTE FEED CUT-OFF			page II.A.4(e)-13 The training plan does not specifically state or address activities around the tank storage farm. NA
		COMMUMICATIONS OR ALARM SYSTEM	✓		
		RESPONSE TO FIRES	✓		
		RESPONSE TO GROUNDWATER CONTAMINATION INCIDENTS		✓	

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		SHUTDOWN OF OPERATIONS			
		IMPLEMENTATION OF TRAINING PROGRAM §§264.16(d)(4) & 264.16(b) - INDICATION THAT TRAINING HAS BEEN AND WILL BE SUCCESSFULLY COMPLETED BY FACILITY PERSONNEL WITHIN SIX MONTHS OF THEIR EMPLOYMENT OR ASSIGNMENT TO A FACILITY, OR TRANSFER TO A NEW POSITION AT AT FACILTIY, WHICHEVER IS LATER. (NOTE: EMPLOYEES HIRED AFTER THE EFFECTIVE DATE OF THESE REGULATIONS MUST NOT WORK IN UNSUPERVISED POSITIONS UNTIL THEY HAVE COMPLETED THE TRAINING REQUIREMENTS). - RECORDS DOCUMENTING THAT THE REQUIRED TRAINING HAS BEEN GIVEN TO AND COMPLETED BY FACILITY PERSONNEL MUST BE MAINTAINED	✓ ✓		page II.A.4(e)-14
		5 CHEMICAL AND PHYSICAL ANALYSIS §§264.13(a)& 270.14(b)(3) FOR EACH HAZARDOUS WASTE TREATED, STORED OR DISPOSED AT THE FACILITY, THE FOLLOWING INFORMATION SHOULD BE PROVIDED: - GENERAL SOURCE AND DESCRIPTION OF THE WASTE - HAZARDOUS CHARACTERISTICS - BASIS FOR HAZARD DESIGNATION - LABORATORY DATA ON ANALYSES RESULTS - EXISTING PUBLISHED OR DOCUMENTED DATA ON HAZARDOUS WASTE OR HAZARDOUS WASTE FROM A SIMILAR PROCESS AT A MINIMUM, THE ANALYSES SHOULD INCLUDE ALL THE INFORMATION WHICH MUST BE KNOWN TO TREAT, STORE OR DISPOSE OF THE WASTE IN ACCORDANCE WITH THE REGULATORY REQUIREMENTS.	✓ ✓ ✓ ✓ ✓		attachment II.A.5

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		6 WASTE ANALYSIS PLAN §§270.14(b)(2) & 264.13 THE WASTE ANALYSIS PLAN SHOULD DESCRIBE THE PROCEDURES USED TO OBTAIN CHEMICAL AND PHYSICAL INFORMATION AND DATA ON THE WASTES TO INSURE PROPER STORAGE, TREATMENT AND DISPOSAL.		✓	Attachment II. A.6 Page II.A.6-1 application references waste materials - should be more specific
		- PARAMETERS AND RATIONALE §264.13 A LIST OF PARAMETERS CHOSEN FOR ANALYSIS AND AN EXPLANATION OF THE RATIONALE FOR THEIR SELECTION.	✓		Table II.A.6-1
		- TEST METHODS §264.13 A DESCRIPTION OF THE TEST METHODS USED TO TEST FOR PARAMETERS CHOSEN (EPA OR EQUIVALENT METHOD).	✓		Table II.A.6-2
		- SAMPLING METHODS §264.13 & 261 APPENDIX I A LIST OF THE SAMPLING METHODS USED TO OBTAIN A REPRESENTATIVE SAMPLE OF EACH WASTE TO BE ANALYZED (EPA OR EQUIVALENT METHOD).	✓		Table II.A.6-3
		- FREQUENCY OF ANALYSIS §264.13(b)(4) A DESCRIPTION OF THE FREQUENCY AT WHICH THE ANALYSES WILL BE REPEATED. FOR AN ON-SITE FACILITY THIS WILL BE WHENEVER THERE IS A PROCESS CHANGE OR AS OFTEN AS REQUIRED TO VERIFY CONSISTENCY OF THE WASTE LOAD.	✓		Table II.A.6-4
		- ADDITIONAL REQUIREMENTS FOR WASTES GENERATED OFF-SITE §§264.13(b)(5) & 264.13(c) A DESCRIPTION OF THE PROCEDURES USE TO			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		INSPECT AND/OR ANALYZE WASTES GENERATED OFFSITE THAT INCLUDES PROCEDURES TO DETERMINE THEIR IDENTITY AND SAMPLING METHODS USED. ALSO INFORMATION SUPPLIED BY THE GENERATOR.	✓		
		- ADDITIONAL REQUIREMENTS FOR FACILITIES HANDLING IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES §§264.13(b)(6) & 264.17 IF THE FACILITY STORES OR TREATS IGNITIBLE, OR INCOMPATIBLE WASTE, A DESCRIPTION OF METHODS WHICH WILL BE USED TO MEET THE ADDITIONAL WASTE ANALYSIS REQUIREMENTS NECESSARY FOR COMPLYING WITH THE REGULATORY REQUIREMENTS FOR THESE TYPES OF HAZARDOUS WASTE.		✓	~~Attachment II.A.-7 not found~~ The waste managed in this tank is compatible with itself. ~~The operating permit application~~ However, the application should address the compatibility should address compatibility with the other waste stored in other tanks.
		7 MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING §264.12; 264.71; §264.72; 264.73; - REQUIRED NOTICES §264.74; 264.75; - MANIFEST SYSTEM §264.76; 264.77; - OPERATING RECORDS - RECORDS RETENTION - ANNUAL REPORTS - UNMANIFESTED WASTE REPORTS - WASTE MINIMIZATION - ADDITIONAL REPORTS			Attachment II.A-7 not found

FACILITY Safety Kleen
I.D. NUMBER FLD 980 847 721
PATS NUMBER HC29-210302
TYPE OF APPLICATION TANK CONSTRUCTION
DATE 5-9-92
REVIEWER W.C. CRAWFORD

SUBMITTALS	REF. NO	DATE	REVIEWER
Application	1	3-23-92	W.C. CRAWFORD
	2		
	3		

REF. NO	PAGE	17-30.401(2) Part II C - Tanks §270.16	COMP.	INCOMP.	COMMENTS
		1. Structural Integrity §§264.191 & 264.192			Attachment II. C. 1 Page II. C. 1-1
		a) Description of Tanks A review of tank design specifications and engineering calculations to assure that the tanks will not collapse or rupture. The specifications and calculations to be reviewed include shell strength, capacity, pressure controls, foundations structural support, and seams sufficient to demonstrate that tank will not collapse or rupture. Specifically, the applicant should address such items as:			
		- Types and number of tanks	✓		1 @ 15000 gallons 10'6" dia 34'0 straight side 36'9" total dished bottom - cone top
		- Tank wall thickness	✓		
		- Tank internal pressure and pressure controls	✓		
		- Foundation construction, specifications, and structural supports	✓		sheet 2 of 5
		- Tank design specifications including dimensions, capacity, design, shell thickness, material and method of construction	✓		15000 gal - 10'6" dia 28'0 tall dished bottom - cone top c.s.
		- Tank design standard code and year	✓		UL 142
		- Specifications on seams			
		- Operating pressure and temperature		✓	
		- Type of waste contained in tanks	✓		Ethylene glycol - ~~ignitable~~ characteristic for lead, pesticides
		- Specific gravity of tank liquids	✓		
		- Maximum height of liquid level		✓	
		b) Hazardous characteristic of the waste			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		Tank construction compatibility with waste and test or documentation to substantiate compatibility.	✓		
		c) Tank Corrosion and Erosion §264.192(a) A review of the pertinent characteristics of the tank construction material and lining materials to determine corrosion or erosion effects with wastes and other materials (i.e., treatment reagents). The applicant should also address: - Description of lining and coating materials - Corrosion allowance and corrosion and erosion rates. Demonstration of how minimum shell thickness will be maintained - Tank construction compatiblity with waste and tests or documentation to substantiate compatibility - Description of treatment reagents.	✓ ✓	✓ #12 #14	- page II.C.1-2 says external coating is adequate - does not specify the coating ATTACHMENT II.C.1 drawing # 4 general note # 11 - 12 and page II.C.1 and 2 NA
		d) Age of the tanks	✓		NEW
		e) Tank integrity examination results			NA
		2. Dimensions and capacity of tanks §264.191 & 192 a) Dimennsions b) Capacity	✓ ✓		page II.C-1 10'6" dia 26'8" high 15000 gal design capacity MAX ———
		3. Tank Management Practices §264.192(b) A description of the tank owner's or operator's operating practices and controls: - Description of controls to prevent overfilling and overtopping such as waste feed cut-off system(s), by-pass or standby tank	✓		ATTACHMENTS II.C.3 and II.C.4

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		- Demonstration of maintenance of sufficient freeboard to prevent overtopping by wave or wind action or precipitation for uncovered tanks			NA
		4. Diagram of Piping, Instrumentation, and Process Flows			ATTACHMENTS II.C.2, II.C.3, II.C.4, and II.C.5 #
		- Tank process flow and piping diagrams and specifications	✓		
		- Description of tank instrumentation such as pressure, temperature, pH level, gauges and monitors	✓		ATTACHMENT II.C.4 - HEADING ON HLA systems say typical and does not specify TAMPA. ~~or other~~
		- Description of safety devices such as rupture discs and safety vents	✓		page II.C-1
		- Description of pollution control devices such as vapor recovery systems.	✓		None
		5. Corrosion Protection §264.191(c)	✓		page II.C-1 and 2
		6. Installed of Tank System §§264.192(b),(c),(d)& (e) §264.192(b) a) certification of proper handling procedures b) type of backfill material §264.192(c) c) tested for tightness §264.192(d) d) supporting and protectionof ancillary equipment §264.192(e)			NA
		7. Secondary Containment System			attachment II.C.1 o
		a) meet requirement for secondary containment §264.193(a)	✓		page II.C-2
		b) 1. Design of system §264.193(b)	✓		drawing 2 of attachment II.C.1
		2. Detecting and collecting releases	✓		
		c) 1. Compatible with waste in the system §264.193)c)			
		2. Foundation	✓		coated
		3. Leak-detection system	✓		daily inspection

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		4. Remove of released waste or accumulated precipitation d) A degree for the secondary containment §264.193(d) e) Secondary containment systems requirement 1. External liner system §264.193(e) 2. Vault system 3. Double-walled tank 4. Variance requirement	✓ ✓		page II.C-3
		8. Variance Requirement § 264.193(g) a) Plans and engineering reports describing alternate design and operating practices. b) Hydrogeologic reports describing prevent of hazardous constituents into the groundwater or surface water c) Risk assessment	✓		NONE
		9. Controls and Practices to Prevent Spills and Overflow §264.194(b) a) Check valves b) Level sensing devices c) High level alarms d) Automatic feed cutoff e) freeboard A description of operation procedures that ensures at least 60 cm (2 ft) of freeboard, unless the open tank is equipped with a containment structure, a drainage control system, or a diversion structure with a capacity that equals or exceeds the volume of the top 60 cm (2 ft) of the tank.	 – ✓ ✓		 drawing 3 Attachment II.C.1 and attachment II.C.2 attachment II.C.3 attachment II.C.4 NONE NA ~~Operating~~ description of operation should include a detailed discussion of the procedures the truck drivers will follow when emptying and filling their trucks
		10. General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		§§264.198 and .199 A description of the precautions taken by a facility that treats, stores, or disposes of ignitable or reactive waste, or accidentally mixes incompatible waste or incompatible wastes and other materials, to prevent reactions which: (1) generate extreme heat or pressure, fire or explosions or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes, or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; (5) by similar means threaten human health or the environment.			this facility does store ethylene glycol a characteristic waste (TCLP)
		Ignitable or Reactive Wastes in Tanks A description of the operational procedures used for storing such wastes in tanks that includes specific information on: - How the waste is treated, rendered, or mixed before or immediately after placement in the tank so tthat it is no longer considered ignitable and complies with §264.17(b); or the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite; or the tank is used solely for emergencies. - How facilities that treat or store ignitable or reactive waste in covered in covered tanks comply with the National Fire Protection Association's code for tanks.			NA
		11. Inspection Schedule			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		§264.15 General Inspection Requirements §264.15(a)&(b) §264.33 A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment: - Monitoring equipment - Emergency and safety equipment - Security devices - Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.	✓ ✓ ✓ ✓		page II. C-3 Item 11 and Table II. 4(d)-1
		Types of Problems §264.15(b)(3) The schedule must identify the types of problems to look for during the inspection (e.g., leaks, deterioration, readings out of specified range, missing items or materials, inoperative equipment, etc.).	✓		
		Frequency of Inspection §264.15(b)(4) A description of the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undected between inspections Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. All emergency waste feed cut-off valves must be inspected at least weekly to verify proper operation. All system alarms must also be tested daily.	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		Specific Process Inspection Requirement §264.195 Tank Inspection - A description of the daily inspection of overfilling control equipment, monitoring equipment and level of waste in uncovered tanks - A description of the weekly inspection of tank construction materials and the area surrounding the tank - A schedule describing the daily monitoring of monitoring equipment (e.g., pressure and temperature gauges, shutoff valves, vents, piping, etc.) where present to ensure that the tank is operated according to design specifications - A schedule showing the level of waste in uncovered tanks is inspected daily - A schedule and procedure for assessing the condition of the tank - A procedure for emptying a tank to allow entry and inspection when necessary.	✓ ✓ ✓ NA ✓ ✓		Table II. A.4(d)-1 daily page II. A.4(d) 2
		Remedial Action §264.15(c) §264.195 Procedures for taking remedial actions when inspections reveal problems. (These may alternately be described in the contingency plan.)			page II. A.4(d)-3 states that these actions will occur - but the schedule does not indicate a location on the form for these corrective actions
		Inspection Log §264.73(b)(5) §264.15(d) A description of the inspection log or summary including the following: - Dates and times of inspections		✓	Table II. A.4(d)-1

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		- Name(s) of inspector(s) - Observations made - Date and nature of repairs or remedial actions.		✓ ✓ ✓	
		12. Closure Closure Plans §122.25(a)(13) §264.112 A copy of the written closure plan consistent with the following items:			attachment II. K
		Closure Performance Standard §264.111 A description of how closure - Minimizes the need for post-closure maintenance - Minimizes releases of hazardous wastes, leachate, and contaminated rainfall to the air, groundwater, surface water, and surrounding land.	 ✓ ✓		 II. K.1-2
		Partial Closure and Final Closure Activities §264.112(a)(1) If partial closure is anticipated, a description of how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure Also, a description of how and when the facility will be finally closed.			N/A
		Maximum Waste Inventory §264.112(a)(2) A calculation of the maximum inventory of wastes that could be in storage and treatment at any time.	 ✓		page II. K.1-1 15000 gal design

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		Inventory Disposal, Removal or Decontamination of Equipment §264.114 A description of how all facility equipment and structures will be decontaminated or disposed of when closure is completed. - Decontamination procedures - Criteria for determining contamination - List equipment - Disposal of contaminated soil - Decontamination of cleanup materials and residues - Demonstrate decontamination has been effective	✓ ✓ ✓	 ✓ ✓ ✓ 	II. K.1-2 PLAN does not address sampling surrounding soils
		Closure of Tanks §264.197 A description of how at closure all hazardous waste residues will be removed from tanks, discharge control equipment, and discharge confinement structure, and the facility will be decontaminated. The description should address the following: - Waste removal from tanks and equipment - Decontamination of all components - Verification of decontamination - Disposal of wastes and residues - Maximum inventory	 ✓ ✓ ✓ ✓ ✓		
		Schedule for Closure §264.112(a)(4) A schedule for final closure including: - Estimated expected year of closure - Closure schedule with total time to close, time for closure activities and inspection schedule during closure.			Page II. K.1-6

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		Time Allowed for Closure §264.113(a)&(b) A schedule for closure which shows - All hazardous wastes will be treated, removed off-site, or disposed of on-site within 90 days from receipt of final volume of waste - All closure activities will be completed within 180 days from receipt of final volume of waste.	✓ ✓		
		Extensions for Closure Time §264.113(a) §264.113(b) A petition made to the Department for a schedule for closure which exceeds the 90 days for treatment, removal, or disposal of wastes and/or the the 180 days for completion of closure activities to the Department. One of the following must be demonstrated: - Closure activities require longer than 180 days - Facility has capacity to receive additional wastes - A person other than owner or operator will begin operation of the site - Closure would be incompatible with continued operation. Demonstrate that all steps have and will be taken to prevent threats to human health and environment from unclosed but inactive facility.		✓	The application did not address petition for extension of closure time frames.

FACILITY Safety Kleen
I.D. NUMBER FLD 980 897 271
PATS NUMBER HCZP- 210 802
TYPE OF APPLICATION TANK CONSTRUCTION
DATE 5-4-92
REVIEWER W. C. CRAWFORD

SUBMITTALS	REF. NO	DATE	REVIEWER
- application	1	3-23-92	W. C. Crawford
	2		
	3		

REF. NO	PAGE	17-30.401(2) Part II K Closure/Post-closure §270.14(b)(13)	COMP.	INCOMP.	COMMENTS
		1 Closure performance standard of §264.111 a. A description of how each hazardous waste management unit at the facility will be closed in accordance with §264.111.	✓		application address the closure of proposed storage tank
		b. A description of how final closure will be conducted in accordance with §264.111, including the maximum extent of the operations which will be not be closed during the active life of the facility.	✓		
		c. An estimate of maximum inventory of wastes ever on site over the active life of the facility of the facility, and a detailed description of the methods to be used during partial and final closures, including, but not limited to: i. Procedures for cleaning equipment ii. Procedures for removing contaminated soils iii. Methods for sampling and testing surrounding soils iv. Criteria for determining the extent of decontamination required to satisfy the closure performanace standard	✓ ✓	 ✓ ✓ 	 plan does not include any sampling of the soils under or around the tank storage area.
		e. A detailed description of additional activities necessary during the closure period to ensure that all partial closures and final closure satisfy the closure performance standards, including, but not limited to:			

FACILITY Safety Kleen FEDERAL I.D. NO. FLD 980 842 271 PATS NO. HK29-210802

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		i. Groundwater monitoring ii. Leachate collection iii. Run-on and run-off control			NA
		f. Closure schedules for each hazardous waste unit and for final closure: i. Time required to close each unit ii. Time required for intervening closure	✓ ✓		
		g. An estimate of the expected year of final closure (for facilities that use trust funds to establish financial assurance under 264.43 or .145 and that are expected to close prior to the expiration of the permit)	✓		2025
		2 A Post-closure plan (if required) in accordance with 264.118 and .197 which must contain the following information for each unit at the facility subject to the requirements of 264. This plan must include all information required by part II, sections A through I of this application [270.14(b)(14)]: a. The activities which will be carried on after closure for each disposal unit and the frequencies of these activities			NA
		b. A description of the planned monitoring activities and frequencies at which they will be performed to comply with subparts F, J, K, L, M and N of Part 264 during the post-closure care period			NA
		c. A description of the planned maintenance activities, and frequencies at which they will be performed to ensure the integrity of the cap and final cover or other containment systems in accordance with the requirements of subparts J, K M and N of Part 264 and to ensure the function of the monitoring equipment in accordance with the requirements of subparts F, J, K, L, M and N			NA

FACILITY Safety Kleen FEDERAL I.D. NO. FLD 980 847 721 PATS NO. HC29-210802

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		d. The name, address and phone number of the person or office to contact about the hazardous waste disposal unit or facility during post-closure care			NA
		3 If closure/post-closure plans have been approved by the Department as part of a previous permit application, attach a copy of the plan as required by 264.112 and 264.118, and either: a. Attach a certification that no changes have been made or b. provide an amended plan showing all changes or proposed changes.			NA

FACILITY Safety Kleen
I.D. NUMBER FLD 980 847 721
PATS NUMBER HC29-210 502
TYPE OF APPLICATION Tank - construction
DATE May 8, 92
REVIEWER W.C. Crawford

SUBMITTALS	REF. NO	DATE	REVIEWER
Application	1	3-23-92	W C Crawford
	2		
	3		

REF. NO	PAGE	17-30.401(2) Part II P - Information Regarding Potential Releases From Solid Waste Management Units	COMP.	INCOMP.	COMMENTS
		1 - Facility Name	✗	✓	application contains information on solid waste management units (Part Q) But not Part P (Potential Releases from SWMU)
		2 - EPA ID Number			
		3 - City			
		4 - State			
		5 - Did they check if they have solid waste management units.			
		6 - Is there a description of the solid waste management units with data on quantities or volumes, and dates.			
		7 - Is there any data for prior or current releases of hazardous waste or constituents a) Date of release b) Type of waste release c) Quantity or volume of waste released d) Describe nature of release			
		8 - Is there a description of the analytical data which describe the nature and extent of environmental contamination			
		9 - Signature of Certification			