Universal Waste & Transit, Inc.

Operation Permit Application

ATTACHMENT "A" - APPLICATION
ATTACHMENT VOLUME 1

Located at:
2002 North Orient Road
Tampa, Florida 33619
(813) 623-5302

Volume 1

- General Information
- Site Information
- Land Use
- Operating Information
- Security
- Financial Responsibility
- Certificates
- Containers
- Chemical, Physical, & Biological Treatment
- Closure

HO29-171163

DER Form # 17-730.900(2)
Form Title Ap. for a Hazardous Waste Facility Permit
Effective Date
DER Application No (Filled in by DER)

Application for a Hazardous Waste Facility Permit

RECEIVED
OCT 10 1989
SOUTH-WEST DIST.
TAMPA

Part I - General

To Be Completed By All Applicants

Please Type or Print

A. General Information

1. Type of Facility:
   Disposal [X] Landfill [ ] Land Treatment [ ] Surface Impoundment [ ] Miscellaneous Units [ ]
   Storage [X] Containers [X] Tanks [ ] Piles [ ] Surface Impoundment [ ] Miscellaneous Units [ ]
   Treatment [X] Tanks [ ] Piles [ ] Incineration [ ] Surface Impoundment [ ] Miscellaneous Units [ ]
2. Type of Application: [ ] TOP [ ] Construction [X] Operation [ ] Closure [ ] RD&D
3. Date current operation began (or is expected to begin): November 1989
4. Facility Name: Universal Waste & Transit, Inc
5. EPA/DER I.D. No.: FLD 981 932 494
6. Facility location or street address: 2002 N. Orient Road
7. Facility mailing address: 2002 N. Orient Road (Street or P.O. Box) Tampa (City) Florida (State) 33619 (Zip)
8. Contact person: ~~[illegible]~~ SHARON ROEHM RJB Telephone: (813) 623-5302
   Title: Vice President / General Manager
   Mailing address: 2501 N. Orient Road Suite A (Street or P.O. Box) Tampa (City) Florida (State) 33619 (Zip)
9. Operator's name: Universal Waste & Transit Telephone: (813) 623-5302
10. Operator's address: 2501 N. Orient Rd. Suite A (Street or P.O. Box) Tampa (City) Florida (State) 33619 (Zip)
11. Facility owner's name: Universal Transit Property
12. Facility owner's address: 2501 N. Orient Road (Street or P.O. Box) Tampa, (City) Florida (State) 33619 (Zip)
13. Legal structure: [X] Corporation [ ] Non-Profit Corporation [ ] Partnership [ ] Individual
    [ ] Local Government [ ] State Government [ ] Federal Government [ ] Other
14. If an individual, partnership, or business is performed under an assumed name, specify county and state where name is registered.
    County: N/A State:
15. If a corporation, indicate state of incorporation Delaware

DER Form # 17-730.900(2)
Form Title Ap. for a Hazardous Waste Facility Permit
Effective Date
DER Application No (Filled in by DER)

C. Land Use Information

1. Present zoning of the site? Heavy Industrial
2. If a zoning change is needed, what should new zoning be? No change needed
3. Present land use of site construction of facility , previosly vacant land

D. Operating Information

1. Is waste generated on site? [X] Yes [ ] No List the SIC codes (4-digit)
   9511 8911 4953 7391

2. Attach a brief description of the facility operation, nature of the business, and activities that generate or otherwise involve hazardous waste.

3. Using the following table and codes provided, specify, (1) each process used for treating, storing, or disposing of hazardous waste (including design capacities) at the facility, and (2) the hazardous waste (or wastes) listed or designated in 40 CFR Part 261, including the annual quantities to be treated, stored, or disposed by each process at the facility. (See instructions for list of process codes and units).

Process Code	Process Design Capacity and Units of Measure	Hazardous Waste Code	Annual Quantity of Hazardous Waste and Units of Measure
	Include as attachment	10	

DER Form # 17-730.900(2)
Form Title Ap. for a Hazardous Waste Facility Permit
Effective Date
DER Application No. (Filled in by DER)

Part II

A. General

1A. Attach a topographic map showing a distance of 1000 feet around the hazardous waste management area at a scale of 1 inch to 200 feet. Contours must be shown on the map with intervals sufficient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit of the facility (e.g., contour intervals of 5 feet if relief is greater than 20 feet or an interval of 2 feet if relief is less than 20 feet). The map should clearly show the following:

1) Map scale and date
2) 100-year floodplain area
3) Orientation of the map
4) Access control (fences, gates)
5) Injection and withdrawal wells both on-site and off-site
6) Building and other structures (recreational areas, access and internal roads, storm, sanitary and process sewerage systems, fire control facilities, etc.)
7) Contours sufficient to show surface water flow
8) Loading and unloading areas
9) Drainage or flood control barriers
10) Hazardous waste units including clean up areas
11) Runoff control system

B. A wind rose should be included with the maps, or as a separate item, indicating the local prevailing wind speed and direction, legend, and date.

C. Traffic information

Topographic maps may be obtained at the following address:

Branch of Distribution
U.S.G.S.
1200 South Eads
Arlington, Virginia 22202
Phone No. (703) 557-2751

Information on latitudes and longitudes may be obtained from the U.S.G.S. National Cartographic Information Center at (703) 860-6336.

2. Financial responsibility information

a) Attach the most recent closure cost estimates for the facility (§264.142) and a copy of the financial mechanism used to establish financial assurance for closure of the facility [§264.143 and §270.14(b)(15)]. Use DER form numbers 17-730.900(4) (a,b,c,d,e,f,g,h,i, or j) only. Retyped documents are not acceptable. Send the originally signed documents to: Hazardous Waste Financial Responsibility Coordinator, Department of Environmental Regulation, Division of Waste Management, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400.

b) If applicable, attach the most recent post-closure care cost estimate for the facility (§264.144) and a copy of the financial mechanism used to establish financial assurance for post-closure care of the facility [§264.145, §264.146 and §270.14(b)(16)]. Use DER form numbers 17-730.900(4) (a,b,c,d,e,f,g,h,i, or j) only. Retyped documents are not acceptable. Send the originally signed documents to the address in a. above.

c) Attach a copy of the documents used to demonstrate liability coverage (§264.147). Use DER form numbers 17-730.900(4) (b,d,k,l,m or n) only. Retyped documents are not acceptable. Send the originally signed documents to the address in a. above. If forms 17-730.900(2) (k, l, m or n) are used, also send a signed duplicate original of the insurance policy with the originally signed documents to the address in a. above [§264.147(a)(1)(i) and (§270.14(b)(17)].

3. Attach a flood map. Information on flood areas may be obtained from a flood map produced by the Federal Insurance Administration (FIA) of the Federal Emergency Management Agency. If a FIA flood map is not available for an area, an equivalent mapping technique may be used to determine whether the facility is within the 100-year floodplain, and if so, what the 100-year flood elevation would be. Information requested in this section may be obtained from the U.S. Geological Survey, the Soil Conservation Service, the Water Management Districts, or the Regional Planning Councils.

If the site is located in the 100-year floodplain, identify the 100-year flood level and any other special flooding factors (e.g., wave action) which must be considered in designing, constructing, operating, or maintaining the facility to withstand washout from a 100-year flood. Additionally, provide the following information:

a) Engineering analysis to indicate the various hydrodynamic and hydrostatic forces expected to result at the site as a consequence of a 100-year flood.

b) Structural or other engineering studies showing the design of operational units (i.e., tanks, incinerators) and flood protection devices (i.e., floodwalls, dikes) at the facility and how these will prevent washout.

c) If applicable, and in lieu of paragraphs (1) and (2) above, a detailed description of procedures to be followed to remove hazardous waste to safety before the facility is flooded, including:

(1) Timing of such movement relative to flood levels, including the estimated time to move the waste to show that such movement can be completed before floodwaters reach the facility;

(2) A description of the location(s) to which the waste will be moved and a demonstration that those facilities will be eligible to receive hazardous waste in accordance with the regulations under 40 CFR Parts 264 and 265;

(3) The planned procedures, equipment, and personnel to be used and the means to ensure that such resources will be available in time for use; and

(4) The potential for accidential discharges of the waste during movement.

If the site is not located in the 100-year floodplain, provide the source of data for such a determination and include a copy of the relevant FIA flood map or the calculations and maps used where a FIA map is not available.

4. Facility security information

a) Attach a description of the security procedures and equipment required by §264.14 [270.14(b)(4)].

b) Attach a copy of the contingency plan required by 40 CFR Part 264, Subpart D [270.14(b)(7)].

c) Attach a description of procedures, structures, or equipment used at the facility to:

(1) Mitigate effects of equipment failure and power outages;
(2) Prevent hazards in unloading operations (i.e., ramps, special forklifts);
(3) Prevent undue exposure of personnel to hazardous waste (i.e., protective clothing);
(4) Prevent contamination of water supplies;
(5) Prevent run-off from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding (i.e., berms, dikes, trenches); and
(6) Prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes [270.14(b)(9)].

d) Attach a description of the preparedness and prevention procedures required by 40 CFR Part 264, Subpart C, including design and operation of the facility, required equipment, testing and maintenance of equipment, access to communications or alarm system, required aisle space, and arrangements with local authorities [270.14(b)(6)].

e) Attach an outline of both the introductory and continuing training programs used to prepare persons to operate or maintain the hazardous waste management facility in a safe manner as required to demonstrate compliance with §264.16 [270.14(b)(12)].

5. Attach a copy of the reports of the chemical and physical analyses of the hazardous wastes handled at the facility, including all information which must be known to treat, store, or dispose of the wastes in accordance with §264.13 [270.14(b)(3)].

6. Attach a copy of the waste analysis plan required by §264.13 [270.14(b)(2)]. Such information should include the following:

a) Parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters;

b) Test methods used;

c) Sampling methods used;

d) Frequency of analysis to ensure accuracy;

e) Waste analyses that generators supply;

f) Methods used to meet additional waste analysis requirements; and if applicable,

g) For off-site facilities, the procedures used to inspect and ensure that the wastes received match the accompanying manifest.

7. Attach a copy of the procedures used to comply with §264.12 and 40 CFR Part 264, Subpart E (manifest system, record keeping, and reporting).

B. Containers

The applicant must provide the following information in accordance with 40 CFR 264 Subpart I (§270.15).

1. Attach the requirements of either (a) or (b):

a) Demonstrate compliance with §264.175(c) by attaching:

1) Test procedures and results or other documentation or information to show that the wastes do not contain free liquids; and
2) A description of how the storage area is designed or operated to drain and remove liquids or how containers are kept from contact with standing liquids.

b) Describe the containment system to show compliance with §264.175(b) by attaching:

1) Basic design parameters, dimensions, and materials of construction.
2) How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system.
3) Capacity of the containment system relative to the number and volume of containers to be stored.
4) Provisions for preventing or managing run-on.
5) How accumulated liquids can be analyzed and removed to prevent overflow.

2. Attach sketches, drawings, or data demonstrating compliance with §264.176 (special requirements for ignitable or reactive wastes) and §264.177 (special requirements for incompatible wastes) where applicable.

3. Where incompatible wastes are stored or otherwise managed in containers, attach a description of the procedures used to ensure compliance with §264.177(a) and (b) (special requirements for incompatible waste) and §264.17(b) and (c) (general requirements for ignitable, reactive, or incompatible waste).

4. Attach a description of the procedures used to comply with §264.171 (condition of containers), §264.172 (compatibility of waste with containers), and §264.173 (management of containers).
5. Attach a copy of the inspection procedures as required in §264.174 (inspections) and §264.15 (general inspection requirements).
6. Attach a copy of the closure plan as required by §§264.112 and 264.178.

C. Tanks

The applicant must provide the following information in accordance with 40 CFR 264 Subpart J (§270.16).

1. A written assesment that is reviewed and certified by an independent, qualified, registered professional engineer to the structural integrity and suitability for handling hazardous waste of each tank system, as required under §§264.191 and 264.192.
2. Dimensions and capacity of each tank.
3. Description of feed systems, safety cutoff, bypass systems, and pressure controls (e.g., vents).
4. A diagram of piping, instrumentation, and process flow for each tank system.
5. A description of materials and equipment used to provide external corrosion protection, as required under §264.191(c).
6. For new tank systems, a detailed description of how the tank system(s) will be installed in compliance with §264.192(b), (c), (d), and (e).
7. Detailed plans and description of how the secondary containment system for each tank system is or will be designed, constructed, and operated to meet the requirements of §264.193(a), (b), (c), (d), (e), and (f).
8. For tank systems for which a variance from the requirements of §264.193 is sought as provided by §264.193(g):
   a) Detailed plans and engineering and hydrogeologic reports, as appropriate, describing alternate design and operating practices that will in conjunction with location aspects, prevent the migration of any hazardous wastes or hazardous constituents into the ground water or surface water during the life of the facility, or
   b) A detailed assessment of the substantial present or potential hazards posed to human health or the environment should a release enter the environment.
9. Description of controls and practices to prevent spills and overflows, as required under §264.194(b).
10. For tank systems in which ignitable, reactive, or incompatible wastes are to be stored or treated, a description of how operating procedures and tank system and facility design will achieve compliance with the requirements of §§264.198 and 264.199.
11. A schedule and procedure for meeting inspection requirements as required by §§264.15 and 264.195.
12. Attach a copy of the closure and post-closure plan as required by §§264.112 and 264.197.
13. Attach a copy of the plan for the response to leaks or spills and disposition of leaking or unfit-for-use tank systems as required by §264.196.

D. Surface Impoundments

The applicant must provide the following information in accordance with 40 CFR 264 Subpart K (§270.17).

1. Attach a list of the hazardous wastes placed or to be placed in each surface impoundment.
2. Attach detailed plans and an engineering report describing how the surface impoundment is or will be designed, constructed, operated, and maintained to meet the requirements of §264.221. This submission must address the following items as specified in §264.221:
   a) The liner system (except for an existing portion of a surface impoundment). If an exemption from the requirement for a liner is sought as provided by §264.221(b), submit detailed plans and engineering and hydrogeologic reports as appropriate, describing alternate design and operation practices that will, in conjuction with location aspects, prevent the migration of any hazardous constituents into the ground water or surface water at any future time;
   b) Prevention of overtopping; and
   c) Structural integrity of dikes.
3. Attach a description of how each surface impoundment, including the liner and cover systems and appurtenances for control of overtopping, will be inspected in order to meet the requirements of §§264.226(a) and (b). This information should include the inspection plan required under §264.15.
4. Attach a certification by a qualified engineer which attests to the structural integrity of each dike, as required under §264.226(c). For new units, the owner or operator must submit a statement by a qualified engineer that he will provide such a certification upon completion of construction in accordance with the plans and specifications.
5. Attach a description of the procedure to be used for removing a surface impoundment from service, as required under §§264.227(b) and (c).

Attach a description of how hazardous waste residues and contaminated materials will be removed from the unit at closure, as required under §264.228(a)(1). For any wastes not to be removed from the unit upon closure, the owner or operator must submit detailed plans and an engineering report describing how §§264.228(a)(2) and (b) will be complied with. This information should include the closure plan and, where applicable, the post-closure plan required under §§264.112* and 264.228*.

7. If ignitable or reactive wastes are to be placed in a surface impoundment, attach an explanation of how §§264.229 and 264.17 will be complied with.
8. If incompatible wastes or incompatible wastes and materials will be placed in a surface impoundment, attach an explanation of how §§264.230 and 264.17 will be complied with.
9. Attach a copy of the notice that has been placed in the deed or other instrument required by §264.119.
10. If applicable, attach a waste management plan for EPA Hazardous Waste Nos. F020, F021, F022, F023, F026, and F027 describing how the surface impoundment is or will be designed, constructed, operated, and maintained to meet the requirements of §264.231. This submission must address the following items as specified in §264.231:
    a) The volume and the physical and chemical characteristics of the wastes, including their potential to migrate through soil or to volatilize or escape into the atmosphere;
    b) The attenuative properties of underlying and surrounding soils or other materials;
    c) The mobilizing properties of other materials co-disposed with these wastes; and
    d) The effectiveness of additional treatment, design, or monitoring techniques.
11. Attach the information described in Part II M - Ground Water Protection.
12. Attach the information described in Part II O - Exposure Information.

*This information should be included in the contingency plan submitted under §264.227.

E. Waste Piles

The applicant must provide the following information in accordance with 40 CFR 264 Subpart L (§270.18).

1. Attach a list of hazardous wastes placed or to be placed in each waste pile.
2. If an exemption is sought to §264.251 and Subpart F of Part 264, as provided by §264.250(c) or §264.90(b)(2), attach an explanation of how the requirements of §264.250(c) will be complied with or detailed plans and an engineering report describing how the requirement of §264.90(b)(2) will be met.
3. Attach detailed plans and an engineering report describing how the pile is or will be designed, constructed, operated and maintained to meet the requirements of §264.251. This submission must address the following items as specified in §264.251:
    a) The liner system (except for an existing portion of a pile). If an exemption from the requirement for a liner is sought, as provided by §264.251(b), the owner or operator must submit detailed plans and engineering and hydrogeologic reports as appropriate, describing alternate design and operating practices that will, in conjunction with location aspects, prevent the migration of any hazardous constituents into the ground water or surface water at any future time;
    b) Control of run-on;
    c) Control of run-off;
    d) Management of collection and holding units associated with run-on and run-off control systems; and
    e) Control of wind dispersal of particulate matter, where applicable.
4. Attach a description of how each waste pile, including the liner and appurtenances for control of run-on and run-off, will be inspected in order to meet the requirements of §§264.254(a) and (b). This information should include the inspection plan required under §264.15.
5. If treatment is carried out on or in the pile, attach details of the proces and equipment used, and the nature and quality of the residuals.
6. If ignitable or reactive wastes are to be placed in a waste pile, attach an explanation of how the requirements of §§264.256 and 264.17 will be complied with.
7. If incompatible wastes or incompatible wastes and materials will be placed in a waste pile, attach an explanation of how §§264.257 and 264.17 will be complied with.
8. Attach a description of how hazardous waste residues and contaminated materials will be removed from the waste pile at closure, as required under §264.258(a). For any waste not to be removed from the waste pile upon closure, the owner or operator must submit detailed plans and an engineering report describing how §264.310(a) and (b) will be complied with. This information should include the closure plan and, where applicable, the post-closure plan required under §§264.112 and 264.118.
9. If applicable, attach a copy of the notice that has been placed in the deed or other instrument required by §264.119.
10. If applicable, a waste management plan for EPA Hazardous Wastes Nos. F020, F021, F022, F023, F026, and F027 describing how a waste pile that is not enclosed, as defined in §264.250(c), is or will be designed, constructed, operated, and maintained to meet the requirements of §264.259. This submission must address the following items as specified in §264.259:
    a) The volume and the physical and chemical characteristics of the wastes to be disposed in the waste pile, including their potential to migrate through soil or to volatilize or escape into the atmosphere;

b) The attenuative properties of underlying and surrounding soils or other materials;
c) The mobilizing properties of other materials co-disposed with these wastes; and
d) The effectiveness of additional treatment, design, or monitoring techniques.

11. Attach the information described in Part II M - Ground Water Protection.

F. Land Treatment

The applicant must provide the following information in accordance with 40 CFR 264 Subpart M (§270.20).

1. Attach a description of plans to conduct treatment demonstration as required under §264.272. The description must include the following information:
   a) The wastes for which the demonstration will be made and the potential hazardous constituents in the wastes;
   b) The date sources to be used to make the demonstration (e.g., literature, laboratory data, field data, or operating data); and
   c) Any specific laboratory or field test that will be conducted, including:
      1) The type of test (e.g., column leaching, degradation);
      2) Materials and methods including analytical procedures;
      3) Expected time for completion;
      4) Characteristics of the unit that will be simulated in the demonstration including treatment zone characteristics, climatic conditions, and operating practices.
2. Attach a description of a land treatment program, as required under §264.271. This information must be submitted with the plans for the treatment demonstration and updated following the treatment demonstration. The land treatment program must address the following items:
   a) The wastes to be land treated;
   b) Design measures and operating practices necessary to maximize treatment in accordance with §264.273(a) including:
      1) Waste application method and rate;
      2) Measures to control soil pH;
      3) Enhancement of microbial or chemical reactions;
      4) Control of moisture content.
   c) Provisions for unsaturated zone monitoring including:
      1) Sampling equipment, procedures, and frequency;
      2) Procedures for selecting sampling locations;
      3) Analytical procedures;
      4) Chain of custody control;
      5) Procedures for establishing background values;
      6) Statistical methods for interpreting results;
      7) The justification for any hazardous constituents recommended for selection as principal hazardous constituents, in accordance with the criteria for such selection in §265.278(a).
   d) A list of hazardous constituents reasonably expected to be in, or derived from, the wastes to be land treated based on waste analysis performed pursuant to §264.13.
   e) The proposed dimensions of the treatment zone.
3. Attach a description of how the unit is or will be designed, constructed, operated, and maintained in order to meet the requirements of §264.273. This submission must address the following items:
   a) Control of run-on;
   b) Collection and control of run-off;
   c) Minimization of run-off or hazardous constituents from the treatment zone;
   d) Management of collection and hold facilities associated with run-on and run-off control systems;
   e) Periodic inspection of the unit. This information should include a copy of the inspection procedures required under §264.15; and
   f) Control of wind dispersal of particulate matter, if applicable.
4. If food-chains crops are to be grown in or on the treatment zone of the land treatment unit, attach a description of how the demonstration required under §264.276(a) will be conducted including:
   a) Characteristics of the food-chain crop for which the demonstration will be made;
   b) Characteristics of the waste, treatment zone, and waste application method and rate to be used in the demonstration;
   c) Procedures for crop growth, sample collection, sample analysis, and data evaluation; and
   d) Characteristics of the comparison crop including the location and conditions under which it was or will be grown.

5. If food-chain crops are to be grown, and cadium is present in the land-treated waste, attach a description of how the requirements of §264.276(b) will be complied with.
6. A description of the vegetative cover to be applied to closed portions of the facility and a plan for maintaining such cover during the post-closure care period, as required under §§264.280(a)(8) and §264.280(c)(2). This information should include the closure plan and, where applicable, the post-closure care plan required under §§264.112 and 264.118.
7. If ignitable or reactive wastes will be placed in or on the treatment zone, attach an explanation of how the requirements of §§264.281 and 264.17 will be complied with.
8. If incompatible wastes or incompatible wastes and materials will be placed in or on the same treatment zone, attach an explanation of how §§265.282 and 264.17 will be complied with.
9. If applicable, a waste management plan for EPA Hazardous Waste Nos. F020, F021, F022, F023, F026, and F027 describing how a land treatment facility is or will be designed, constructed, operated, and maintained to meet the requirements of §264.283. This submission must address the following items as specified in §264.283:
   a) The volume and the physical and chemical characteristics of the wastes, including their potential to migrate through soil or to volatilize or escape into the atmosphere;
   b) The attentuative properties of underlying and surrounding soils or other materials;
   c) The mobilizing properties of other materials co-disposed with these wastes; and
   d) The effectiveness of additional treatment, design, or monitoring techniques.
10. Attach an unsaturated zone monitoring program as required by §264.278.
11. Attach a statement of how the recordkeeping requirement will be met to satisfy §264.279.
12. Attach the information described in Part II M - Ground Water Protection.

G. Landfills

The applicant must provide the following information in accordance with 40 CFR 264 Subpart N (§270.21).

1. Attach a list of the hazardous wastes placed or to be placed in each landfill or landfill cell.
2. Attach detailed plans and an engineering report describing how the landfill is or will be designed, constructed, operated, and maintained to comply with the requirements of §264.301. This submission must address the following items as specified in §264.301:
   a) The liner system and leachate collection and removal system (except for an existing portion of a landfill). If an exemption from the requirements for a liner and a leachate collection and removal system is sought as provided by §264.301(b), submit detailed plans and engineering and hydrogeologic reports as appropriate describing alternate design and operating practices that will, in conjunction with location aspects, prevent the migration of any hazardous constituent into the ground water or surface water at any future time;
   b) Control of run-on;
   c) Control of run-off;
   d) Management of collection and holding facilities associated with run-on and run-off control systems; and
   e) Control of wind dispersal of particulate matter, where applicable.
3. If an exemption from Subpart F of Part 264 is sought, as provided by §264.90(b)(2), the owner or operator must submit detailed plans and an engineering report explaining the location of the saturated zone in relation to the landfill, the design of a double-liner system that incorporates a leak detection system between the liners, and a leachate collection and removal system above the liners.
4. Attach a description of how each landfill, including the liner and cover systems, will be inspected in order to meet requirements of §§264.303(a) and (b). This information should include the inspection plan required under §264.15.
5. Attach detailed plans and an engineering report describing the final cover which will be applied to each landfill or landfill cell at closure in accordance with §264.310(a), and a description of how each landfill will be maintained and monitored after closure in accordance with §264.310(b). This information should include the closure and post-closure plans required under §§264.112 and 264.118.
6. If ignitable or reactive wastes will be landfilled, attach an explanation of how the requirements of §§264.312 and 264.17 will be complied with.
7. If incompatible wastes, or incompatible wastes and materials will be landfilled, attach n explanation of how §§264.313 and 264.17 will be complied with.
8. If bulk or non-containerized liquid waste or waste containing free liquids is to be landfilled, attach an explanation of how the requirements of Chapter 17-730.180(3) will be complied with.
9. If containers of hazardous waste are to be landfilled, attach an explanation of how the requirements of §§264.315 or 264.316, as applicable, will be complied with.
10. Attach a copy of the notice that has been placed in the deed or other instrument required by §264.119.

11. If applicable, attach a waste management plan for EPA Hazardous Waste Nos. F020, F021, F022, F023, F026, and F027 describing how a landfill is or will be designed, constructed, operated, and maintained to meet the requirements of §264.317. This submission must address the following items as specified in §264.317:
    a) The volume and the physical and chemical characteristics of the wastes, including their potential to migrate through soil or to volatilize or escape into the atmosphere;
    b) The attentuative properties of underlying and surrounding soils or other materials;
    c) The mobilizing properties of other materials co-disposed with these wastes; and
    d) The effectiveness of additional treatment, design, or monitoring techniques.
12. Attach a statement of how the surveying and recordkeeping requirement will meet §264.309.
13. Attach the information described in Part II M - Ground Water Protection.
14. Attach the information described in Part II O - Exposure Information.

H. Incinerators

The applicant must provide the following information in accordance with 40 CFR 264 Subpart O (§270.19).

1. The applicant must fulfill the requirements of either Section a), b), or c):
    a) When seeking an exemption under §264.340(b) or (c) (ignitable, corrosive or reactive wastes only), attach documentation showing:
        1) That the waste is listed as a hazardous waste in Part 261, Subpart D, solely because it is ignitable (Hazard Code I), corrosive (Hazard Code C), or both; or
        2) That the waste is listed as a hazardous waste in Part 261, Subpart D, solely because it is reactive (Hazard Code R) for characteristics other than those listed in §261.23(a)(4) and (5), and will not be burned when other hazardous wastes are present in the combustion zone; or
        3) That the waste is a hazardous waste solely because it possesses the characteristic of ignitability, corrosivity, or both, as determined by the tests for characteristics of hazardous wastes under Part 261, Subpart C; or
        4) That the waste is a hazardous waste solely because it possesses the reactivity characteristics listed in §261.23(a)(1), (2), (3), (6), (7), or (8), and that it will not be burned when other hazardous wastes are present in the combustion zone.
    b) Submit the results of a trial burn conducted in accordance with and including all the determinations required by the following:
        1) The trial burn must be conducted in accordance with a trial burn plan prepared by the applicant and approved by the Department. The trial burn plan will then become a condition of the permit. The trial burn plan will include the following information:
            (a) An analysis of each waste, or mixture of wastes, to be burned which includes:
                (1) Heat value of the waste in the form and composition in which it will be burned;
                (2) Viscosity (if applicable), or description of physical form of the waste;
                (3) An identification of any hazardous organic constituents listed in 40 CFR Part 261, Appendix VIII, which are present in the waste to be burned, except that the applicant need not analyze for constituents listed in 40 CFR Part 261, Appendix VIII, which would reasonably not be expected to be found in the waste. The constituents excluded from analysis must be identified and the basis for their exclusion stated. The waste analysis must rely on analytical techniques specified in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference) or their equivalent; and
                (4) An approximate quantification of the hazardous constituents identified in the waste, within the precision produced by the analytical methods specified in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference) or their equivalent.
            (b) A detailed engineering description of the incinerator for which the permit is sought, including:
                (1) Manufacturer's name and model number of incinerator (if available);
                (2) Type of incinerator;
                (3) Linear dimensions of the incinerator unit including the cross sectional area of combustion chamber;
                (4) Description of the auxiliary fuel system (type/feed);
                (5) Capacity of prime mover;
                (6) Description of automatic waste feed cut-off system(s);
                (7) Stack gas monitoring and pollution control equipment;
                (8) Nozzle and burner design;
                (9) Construction materials; and
                (10) Location and description of temperature, pressure, and flow indicating and control devices.
            (c) A detailed description of sampling and monitoring procedures, including sampling and monitoring locations in the system, the equipment to be used, sampling and monitoring frequency, and planned analytical procedures for sample analysis.

(d) A detailed test schedule for each waste for which the trial burn is planned including date(s), duration, quantity of waste to be burned, and other factors relevant to the Department's decision under Paragraph (4) of this section.

(e) A detailed test protocol, including, for each waste identified, the ranges of temperature, waste feed rate, combustion gas velocity, use of auxiliary fuel, and any other relevant parameters that will be varied to affect the destruction and removal efficiency of the incinerator.

(f) A description of, and planned operating conditions for, any emission control equipment which will be used.

(g) Procedures for rapidly stopping waste feed, shutting down the incinerator, and controlling emissions in the event of an equipment malfunction.

(h) Such other information as the Department reasonably finds necessary to determine whether to approve the trial burn plan in light of the purposes of this paragraph and the criteria in Paragraph (4) of this section.

2) The Department, in reviewing the trial burn plan, shall evaluate the sufficiency of the information provided and may require the applicant to supplement this information, if necessary, to achieve the purposes of this paragraph.

3) Based on the waste analysis data in the trial burn plan, the Department will specify as Trial Principal Organic Hazardous Constituents (Trial POHC's), those constituents for which destruction and removal efficiencies must be calculated during the trial burn. These Trial POHC's will be specified by the Department based on its estimate of the difficulty of incineration of the constituents identified in the waste analysis, their concentration or mass in the waste feed, and, for wastes listed in 40 CFR Part 261, Subpart D, the Hazardous Waste Organic Constituent of constituents identified in Appendix VII of that part as the basis for listing.

4) The Department shall approve a trial burn plan if it finds that:

(a) The trial burn is likely to determine whether the incinerator performance standard required by §264.343 can be met.

(b) The trail burn itself will not present an imminent hazard to human health or the environment.

(c) The trial burn will help the Department to determine operating requirements to be specified under §264.345.

(d) The information sought in paragraphs (4)(a) and (c) of this section cannot reasonably be developed through other means.

5) During each approved trial burn (or as soon after the burn as is practicable) the applicant must make the following determinations:

(a) A quantitative analysis of the trial POHC's in the waste feed to the incinerator;

(b) A quantitative analysis of the exhaust gas for the concentration and mass emissions of the Trial POHC's, oxygen (O_2) and hydrogen chloride (HCl);

(c) A quantitative analysis of the scrubber water (if any), ash residues, and other residues for the purpose of estimating the fate of Trial POHC's;

(d) A computation of destruction and removal efficiency (DRE) in accordance with the DRE formula specified in §264.343(a);

(e) If the HCl emission rate exceeds 1.8 kilograms of HCl per hour (4 lbs per hour), a computation of HCl removal efficiency in accordance with §264.343(b);

(f) A computation of particulate emissions in accordance with §264.343(c);

(g) An identification of sources of fugitive emissions and their means of control;

(h) A measurement of average, maximum, and minimum temperatures, and combustion gas velocity;

(i) A continuous measurement of carbon monoxide (CO) in the exhaust gas; and

(j) Such other information as the Department may specify as necessary to ensure that the trial burn will determine compliance with the performance standard in §264.343 and to establish the operating conditions required by §264.345 as necessary to meet that performance standard.

6) The applicant shall submit to the Department a certification that the trial burn has been carried out in accordance with the approved Trial Burn Plan, and the results of all the determinations required in Paragraph (5)(a) of this section. The submission shall be made within 90 days of the completion of the trial burn or later if approved by the Department.

7) All data collected during any trial burn must be submitted to the Department following the completion of the trial burn.

8) All submissions required by this paragraph shall be certified on behalf of the applicant by the signature of a person authorized to sign a permit application or a report.

c) In lieu of a trial burn, the applicant may submit the following information:

1) An analysis of each waste or mixture of wastes to be burned including:

(a) Heat value of the waste in the form and composition in which it will be burned;

(b) Viscosity (if applicable) or description of physical form of the waste;

(c) An identification of any hazardous organic constituents listed in Part 261, Appendix VIII, which are present in the waste to be burned, except that the applicant need not analyze for constituents listed in Part 261, Appendix VIII, which would reasonably not be expected to be found in the waste. The constituents excluded from analysis must be identified and the basis for their exclusion stated. The waste analysis must rely on analytical techniques specified in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference) or their equivalent;

(d) An approximate quantification of the hazardous constituents identified in the waste, within the precision produced by the analytical methods specified in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference) or their equivalent; and

(e) A quantification of those hazardous constituents in the waste which may be designated as POHC's based on data submitted from other trial or operational burns which demonstrate compliance with the performance standard in §264.343.

2) A detailed engineering description of the incinerator, including:

(a) Manufacturer's name and model number of incinerator;

(b) Type of incinerator;

(c) Linear dimension of incinerator unit including cross sectional area of combustion chamber;

(d) Description of auxiliary fuel system (type/feed);

(e) Capacity of prime mover;

(f) Description of automatic waste feed cutoff system(s);

(g) Stack gas monitoring and pollution control monitoring system;

(h) Nozzle and burner design;

(i) Construction materials; and

(j) Location and description of temperature, pressure, and flow indicating devices and control devices.

3) A description and analysis of the waste to be burned compared with the waste for which data from operational or trial burns are provided to support the contention that a trial burn is not needed. The data should include those items listed in this part. This analysis should specify the POHC's which the applicant has identified in the waste for which a permit is sought, and any differences from the POHC's in the waste for which burn data are provided.

4) The design and operating conditions of the incinerator unit to be used, compared with that for which comparative burn data are available.

5) A description of the results submitted from any previously conducted trial burn(s), including:

(a) Sampling and analysis techniques used to calculate performance standards in §264.343;

(b) Methods and results of monitoring temperatures, waste feed rates, carbon monoxide, and an appropriate indicator of combustion gas velocity (including a statement concerning the precision and accuracy of this measurement); and

(c) The certification and results required by Paragraph (b)(5)(b).

6) The expected incinerator operation information to demonstrate compliance with §§264.343 and 264.345, including:

(a) Expected carbon monoxide (CO) level in the stack exhaust gas;

(b) Waste feed rate;

(c) Combustion zone temperature;

(d) Indication of combustion gas velocity;

(e) Expected stack gas volume, flow rate, and temperature;

(f) Computed residence time for waste in the combustion zone;

(g) Expected hydrochloric acid removal efficiency;

(h) Expected fugitive emissions and their control procedures; and

(i) Proposed waste feed cut-off limits based on the identified significant operating parameters.

7) Such supplemental information as the Department finds necessary to achieve the purposes of this paragraph.

8) Waste analysis data, including that submitted in Paragraph One (1) of this section, sufficient to allow the Department to specify as permit Principal Organic Hazardous Constituents (Permit POHC's) those constituents for which destruction and removal efficiencies will be required.

9) The Department shall approve a permit application without a trial burn if it finds that:

(a) The wastes are sufficiently similar; and

(b) The incinerator units are sufficiently similar, and the data from other trial burns are adequate to specify (under §264.345) operating conditions that will ensure that the performance standards in §264.343 will be met by the incinerator.

2. Attach a copy of the inspection schedule which demonstrates compliance with §264.15 (General Inspection Requirements). Unless exempted in accordance with §263.340, include a demonstration of compliance with §264.347 (Monitoring and Inspections).

3. Attach a copy of the closure plan as required in §§264.112 and 264.351.

I. Miscellaneous Units

The applicant must provide the following information in accordance with 40 CFR 264 Subpart X (§270.23)

1. Attach a detailed description of the unit being used or proposed for use, including the following:
   a) Physical characteristics, materials of construction, and dimensions of the unit;
   b) Detailed plans and engineering reports describing how the unit will be located, designed, constructed, operated (§264.73), maintained (§264.33), monitored, inspected (§264.15), and closed (§264.112) to comply with the requirements of §§264.601 and 264.602; and
   c) For disposal units, a detailed description of the plans to comply with the post-closure requirements of §§264.603 and 264.118.
2. Attach detailed hydrologic, geologic, and meterologic assessments and land-use maps for the region surrounding the site that address and ensure compliance of the unit with each factor in the environmental performance standards §264.601.
3. Attach information on the potential pathways of exposure of humans or environmental receptors to hazardous waste or hazardous constituents and on the potential magnitude and nature of such exposures.
4. Attach for any treatment unit, a report on a demonstration of the effectiveness of the treatment based on laboratory or field data.
5. If ignitable, reactive, or incompatible wastes are to be placed in the miscellaneous unit, attach an explanation of how the requirements of §264.17 will be complied with.
6. Submittal of 17-730.900(2) Part II - K - Closure
7. Submittal of 17-730.900(2) Part II - M - Ground Water Protection. (If applicable)
8. Submittal of 17-730.900(2) Part II - O - Exposure Information.

J. Reserved

K. Closure

The applicant must provide the following information in accordance with 40 CFR 264 Subpart G (§270.14(b)(13)).

1. Attach the following information to meet the closure performance standard of 40 CFR 264.111, which requires controlling, minimizing, or eliminating to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground water, surface waters or to the atmosphere (this plan must include all of the information required under Part II Sections A through I of this application) (§270.14(b)(13)):
   a) A description of how each hazardous waste management unit at the facility will be closed in accordance with 40 CFR 264.111;
   b) A description of how final closure of the facility will be conducted in accordance with 40 CFR 264.111. The description must identify the maximum extent of the operations which will be unclosed during the active life of the facility;
   c) An estimate of the maximum inventory of wastes ever onsite over the active life of the facility and a detailed description of the methods to be used during partial closures and final closure, including but not limited to, methods for removing, transporting, treating, storing, or disposing of all hazardous wastes and identification of the type(s) of the offsite hazardous waste management units to be used, if applicable;
   d) A detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during partial and final closure, including, but not limited to, procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of decontamination required to satisfy the closure performance standard;
   e) A detailed description of other 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, ground water monitoring, leachate collection, and run-on and run-off control; and
   f) A schedule for closure of each hazardous waste management unit and for final closure of the facility. The schedule must include, at a minimum, the total time required to close each hazardous waste management unit and the time required for intervening closure activities which will allow tracking of the progress of partial and final closure.
   g) For facilities that use trust funds to establish financial assurance under §264.143 or §264.145 and that are expected to close prior to the expiration of the permit, an estimate of the expected year of final closure.

ttach, if required, a post-closure plan in accordance with §264.118 and §264.197 which must contain the following information for each azardous waste management unit at the facility subject to the requirements of Part 264 (this plan must inlcude all information required by Part II Sections A through I of this application) (§270.14(b)(13)):

a) The activities which will be carried on after closure for each disposal unit and the frequency of these activities;

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;

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, L, 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 of Part 264; and

d) The name, address, and phone number of the person or office to contact about the hazardous waste disposal unit or facility during the post-closure care period.

3. If closure or post-closure plans have been approved by the Department as part of a TOP, Construction, or Operation Permit Application, attach a copy of a closure and post-closure plan as required by §264.112 and §264.118. Also, either:

a) Attach a certification stating that no changes have been made to the plans which have been provided to the Department; or

b) Provide an amended plan showing all the changes which have been made, or are proposed to be made, to the plans which have been provided to the Department.

L. Compliance Schedule

1. The applicant may, at his option, propose a compliance schedule for achieving compliance with any standards that have not been met at this time. The Department will take this proposal into consideration when developing a compliance schedule.

M. Ground Water Protection

The applicant must provide the following information in accordance with 40 CFR 264 Subpart F (§270.14(C)).

The following additional information regarding protection of ground water is required from owners or operators of hazardous waste surface impoundments, piles, land treatment units, miscellaneous units, and landfills except as otherwise provided in §264.90(b) or Section 17-730.180(7), FAC:

1. A summary of the ground water monitoring data obtained during the interim status period under §§265.90 through 265.94, where applicable.

2. Identification of the uppermost aquifer and aquifers hydraulically interconnected beneath the facility property, including ground water flow direction and rate, and the basis for such identification (i.e., the information obtained from hydrogeologic investigations of the facility area including ground water contour maps).

3. On the topographic map required under Part II-A-1, a delineation of the waste management area, the property boundary, the proposed "Point of Compliance" as defined under §264.95, the proposed location of ground water monitoring wells as required under §264.97, and to the extent possible, the information required in (2) above.

4. A description of any plume of contamination that has entered the ground water from a regulated unit at the time that the application is submitted that:

a) Delineates the vertical and horizontal extent of the plume of the topographic map required under Part II-A-1; and

b) Identifies the concentration of each hazardous constituents in Appendix IX of Part 264 throughout the plume or identifies the maximum concentrations of each hazardous constituent in Appendix IX of Part 264 in the plume.

5. Detailed plans and an engineering report describing the proposed ground water monitoring program to be implemented to meet the requirements of §264.97.

6. If the presence of hazardous constituents has not been detected in the ground water at the time of permit application, the owner or operator must submit sufficient information, supporting data, and analyses to establish a detection monitoring program which meets the requirements of §264.98. This submission must address the following items as specified under §264.98:

a) A proposed list of indicator parameters, waste constituents, or reaction products that can provide a reliable indication of the presence of hazardous constituents in the ground water;

b) A proposed ground water monitoring system;

c) Background values for each proposed monitoring parameter or constituent, or procedures to calculate such values; and

d) A description of proposed sampling, analysis and statistical comparison procedures to be utilized in evaluating ground water monitoring data.

7. If the presence of hazardous constituents has been detected in the ground water at the point of compliance at the time of permit application, the owner or operator must submit sufficient information, supporting data, and analyses to establish a compliance monitoring program which meets the requirements of §264.99. The owner or operator must also submit an engineering feasibility plan for a corrective action program necessary to meet the requirements of §264.100 and Chapter 17-730.180(4) except as provided in §264.98(h)(5). To demonstrate compliance with §264.99, the owner or operator must address the following items:

a) A description of the wastes previously handled at the facility;

b) A characterization of the contaminated ground water, including concentrations of hazardous constituents;

c) A list of hazardous constituents for which compliance monitoring will be undertaken in accordance with §§264.97 and 264.99;

d) Proposed concentration limits for each hazardous constituent, based on the criteria set forth in §264.94(a), including a justification for establishing any alternate concentration limits;

e) Detailed plans and an engineering report describing the proposed ground water monitoring system, in accordance with the requirements of §264.97; and

f) A description of proposed sampling, analysis and statistical comparison procedures to be utilized in evaluating ground water monitoring data.

8. If hazardous constituents have been measured in the ground water which exceed the concentration limits established under §264.94 Table 1, or if ground water monitoring conducted at the time of permit application under §§265.90-264.94 at the waste boundary indicates the presence of hazardous constituents from the facility in ground water over background concentrations, the owner or operator must submit sufficient information, supporting data, and analyses to establish a corrective action program which meets the requirements of §§264.100 and 264.101 and Chapter 17-730.180(4). However, an owner or operator is not required to submit information to establish a corrective action program if the owner or operator demonstrates to the Department that alternate concentration limits will protect human health and the environment after considering the criteria listed in §264.94(b). An owner or operator who is not required to establish a corrective action program for this reason must instead submit sufficient information to establish a compliance monitoring program which meets the requirements of §264.99 and (6) above. To demonstrate compliance with §§264.100 and 264.101 and Chapter 17-730.180(4), the owner or operator must address, at a minimum, the following items:

a) A characterization of the contaminated ground water, including concentratrions of hazardous constituents;

b) The concentration limit for each hazardous constituent found in the ground water as set forth in §264.94;

c) Detailed plans and an engineering report describing the corrective action to be taken;

d) A description of how the ground water monitoring program will assess the adequacy of the corrective action; and

e) A description of the wastes previously handled at the facility.

Chapters 17-3 and 17-4, FAC, requirements.

In accordance with Section 17-730.180(4)(c) hazardous waste facilities which may impact the ground water must also comply with the ground water provisions of Chapters 17-3 and 17-4. The Department's Supplemental Ground Water Monitoring Form (DER Form 17-1.216(3)), must be completed as part of the Hazardous Waste Permit Application unless the Department makes the determination that the facility's existing Hazardous Waste Ground Water Monitoring Program is in substantial compliance with Section 17-4.245(6).

10. Additional ground water monitoring requirements.

a) All ground water samples must be taken without using filters. Filtered samples may be taken for comparison purposes only.

b) A well construction summary report must be completed and submitted for each piezometer, ground water monitoring and recovery well installed as part of initial site assessment and any ground water monitoring program(s) under 40 CFR Parts 264 and 265.

DER Form # 17-730.900(2)
Form Title Ap. for a Hazardous Waste Facility Permit
Effective Date
DER Application No (Filled in by DER)

Well Construction Summary Report

Facility: _____

EPA identification number

Well identification

Date(s) of installation _____

Well driller's complete name _____

Well driller's license number _____

Latitude (D D M M S S . S S) Longitude (D D M M S S . S S)

Elevation surface: _____ Elevation TOC: _____

Surveyor's name: _____ Surveyor's license # _____

Turbidity: _____ Date of reading (M M D D Y Y)

Static water level (msl) _____

Casing:

Material	Outside Diameter	Inside Diameter	Depth From (ft)	Depth To (ft)

Screen:

Material	Outside Diameter	Inside Diameter	Depth From (ft)	Depth To (ft)	Slot Size

Annulus:

Material including Additives for sealant	Size of Material	Depth From (ft)	Depth To (ft)	Installation Method

Drilling Method	Bit/auger Diameter	From (ft)	To (ft)	Drilling fluids

Well Construction Diagram

Surface (msl) _____

Scale: 1 unit = _____

DER Form #: 17-730.900(2)
Form Title: Ap. for a Hazardous Waste Facility Permit
Effective Date:
DER Application No. (Filled in by DER)

Instructions for Well Construction Summary

A. **Elevation:** The land surface elevation at the well location and the elevation of the top of casing (TOC) must be reported relative to mean sea level (MSL).

B. **Turbidity:** Measurements must be made immediately after well development is completed.

C. **Casing:** List the material of each casing used (PVC, stainless steel, etc.) in order of emplacement in each well, the inside and outside diameter of each casing, and the top and bottom depth of each casing (or series of casings where identical casings are used) relative to ground surface.

D. **Screen:** List the material of the monitoring screen, inside and outside diameter of the screen, the top and bottom depth of the screen (relative to ground surface) and the manufactured slot (or perforation) size of the screen.

E. **Annulus:** List the material(s) used to seal the annular space of the well along with any additives, the size of the material (filter pack), the depth interval (relative to ground surface), and the method used to install the material (tremie pipe, pouring, etc.).

F. **Drilling method:** List drilling method(s) used to install the well (mud-rotary, etc.), the diameters of the bit or auger used, the drilling interval (relative to ground surface) for each method or bit/auger diameter used, and the type of drilling fluids used.

G. **Well construction diagram:** The diagram should show the final construction details of the well including surface elevation, hole diameter, casing length, casing material, screen length, screen material, annulus sealant, and total depth of the well. Height (relative to ground surface) of stickup and presence of security should be indicated.

H. **Latitude, Longitude:** These must be reported to the nearest one-hundreth (.01) of a second.

DER Form # 17-730.900(2)
Form Title Ap for a Hazardous Waste Facility Permit
Effective Date
DER Application No. (Filled in by DER)

N. Research, Development and Demonstration

1. The applicant should submit a letter to the Department summarizing the proposed research prior to submitting the formal application so that the Department may, in accordance with 17-730.330(2), determine if any of the requirements of the application can be waived. This letter should contain:
   a) The purpose of the research;
   b) An explanation of why the research is innovative and experimental; and
   c) A summary of the research objectives.
2. As part of the formal application, the applicant should submit the following information:
   a) The purpose of this project.
   b) An explanation as to why the proposed activity is experimental and innovative..
   c) A general description of the proposed activity.
   d) The estimated time of operation for the experimental activities.
   e) Any information on the expected performance of the unit.
   f) A description of performance data that may have been previously generated from the operation of the unit.
3. Monitoring and inspection requirements should be established at a level consistent with the proposed activity in order to assure protection of human health and the environment.
4. Reporting and record keeping should be proposed in a manner which will sufficiently provide the Department with data about the operating efficiency of the RD&D activity. Time frames for the submission of data should be proposed and should be at a frequency adequate to allow proper department oversight of the experimental activity.
5. Personnel qualifications should be given and be consistent with the proposed experimental activity. The personnel responsible for conducting and managing the experimental testing should be technically competent to assure that any situations which arise as a result of the experimental activity will be properly handled.
6. A closure plan should be prepared in accordance with the appropriate sections of Part II of this application.

O. Exposure Information (§270.10(j))

The applicant must provide the following information, if the facility has a surface impoundment, miscellaneous units, or a landfill:

1. Reasonably foreseeable potential releases from both normal operations and accidents at the unit, including releases associated with transportation to or from the unit.
2. The potential pathways of human exposure to hazardous wastes or constituents resulting from the release described under Paragraph One (1).
3. The potential magnitude and nature of the human exposure resulting from such releases.

P. Information Regarding Potential Releases from Solid Waste Management Units

Facility name: Universal Waste & Transit, Inc

EPA I.D. number: FLD 981-932-494

Location: City Tampa State Florida

1. Are there any of the following solid waste management units (existing or closed) at your facility?

Note - Do not include hazardous wastes units currently shown in your Part B application

	Yes	No		Yes	No		Yes	No
Landfill	☐	☒	Storage Tank (Above Ground)	☐	☒	Wastewater Treatment Units	☐	☒
Surface Impoundment	☐	☒	Storage Tank (Underground)	☐	☒	Transfer Stations	☐	☒
Land Farm	☐	☒	Container Storage Area	☐	☒	Waste Recycling Operations	☐	☒
Waste Pile	☐	☒	Injection Wells	☐	☒	Land Treatment Facility	☐	☒
Incinerator	☐	☒						

DER Form # 17-730.900(2)
Form Title Ap. for a Hazardous Waste Facility Permit
Effective Date
DER Application No. (Filled in by DER)

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, and location at facility. Provide a site plan if available.

Note: Hazardous waste are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and *also* those hazardous waste units in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information:

a. Date of release
b. Type of waste released
c. Quantity or volume of waste released
d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

No prior or current releases of hazardous wastes or constituents to the enviroment have previously occured or are now occuring

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or ground water.

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Robert J. Bedore Vice Pres.
Name and Title (Typed)

DER Form # 17-730.900(2)
Form Title Ap. for a Hazardous Waste Facility Permit
Effective Date
DER Application No. (Feed in by DER)

Application for a Hazardous Waste Facility Permit
Certification

To be completed by all applicants

1. **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 possiblity of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department of Environmental Regulation. It is understood that the permit is only transferable in accordance with Section 17-730, FAC, and, if granted a permit, the Department of Environmental Regtulation will be notified prior to the sale or legal transfer of the permitted facility.

Pamela K. Day
Signature of the Operator or Authorized Representative*

Pamela K. Day Vice President/GM
Name and Title (Please Type or Print)

*Attach a letter of authorization

Date: _____ Telephone No. (813) 623-5302

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 close 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 and regulations of the Department of Environmental Regulation.

Signature of the Facility Owner or Authorized Representative*

Robert J. Bedore Vice President
Name and Title (Please Type or Print)

*Attach a letter of authorization

Date: _____ Telephone No. (____) _____

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 to construct, operate, or close a hazardous waste management facility on the property as described. For hazardous waste disposal facilities, 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 17-730, FAC.

Signature of the Facility Owner or Authorized Representative*

Robert J. Bedore Vice President
Name and Title (Please Type or Print)

*Attach a letter of authorization

Date: _____ Telephone No. (____) _____

4. **Professional Engineer Registered in Florida (Where Required by Chapter 471, F.S.)**

This is to certify that the engineering features of this hazardous waste management facility have been designed/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 Regulation.

James Winter
Signature

James Winter
Name (Please Type)

Florida Registration No.: 18313

Mailing address: 14483 62nd St North
Street or P.O. Box

Clearwater, FL 34620
City State Zip

(Please Affix Seal)

(813) 539-0051
Telephone No.

9/27/89
Date

VOLUME 1

GENERAL FACILITY INFORMATION

Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary
Dr. Richard Garrity, Deputy Assistant Secretary

JUN 16 1989

Robert J. Bedore, Vice President
Universal Waste & Transit, Inc.
2501 North Orient Road, Suite A
Tampa, Florida 33619

Permit Modification
Construction Permit HC29-141782

Dear Mr. Bedore:

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

CONDITION	FROM	TO
Expiration Date	November 23, 1989	November 23, 1990

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

Richard Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

RDG/pjpb

cc: James Scarbrough - EPA/Atlanta
Satish Kastury - DER/Tallahassee

CERTIFICATION OF COMPLETION

This is to certify that the engineering features of this hazadous waste management facility has been examined by me and is found to conform to engineering principals applicable to such facility.

In my professional judgement, this facility was constructed in accordance with Construction Permit #HC29-141782 and when properly maintained, operated, and closed, the facility will comply with all applicable statutes and rules of the Department of Environmental Regulation.

James Winter 12/6/89

JAMES M. WINTER, P.E. #18313 Date
Registered Florida Engineer
(Seal)

SEMINOLE ENGINEERING, INC.
14483 62nd Street North
Clearwater, FL 34620
(813)539-0051

UNIVERSAL WASTE & TRANSIT, INC.

2501 N. Orient Rd.
Suite A
Tampa, FL 33619
813-623-5302

December 5, 1989

Mrs. Lynne Milanian
Florida Department of
Environmental Regulations
4520 OakFair Blvd.
Tampa, FL 33610 - 7347

Ref: Permit #H029-171163

Dear Mrs. Milanian,

We are requesting that the above Hazardous Waste permit application be modified to include the acceptance of unknown wastes.

1. To receive and store said unknown waste, but not limited to emergency response situations.
2. Said waste may be generated or managed by various governmental agencies such as fire departments, US-EPA, Florida DER, etc.
3. A manifest will be filled out for each stream after field testing (finger printing).
4. Unknowns will be manifested then stored according to the findings in the finger print analysis, ie, waste corrosive liquids, etc.
5. Universal will not take title to any unknown waste until testing is complete.
6. Each material/waste will be finger printed prior to acceptance for corrosives, reactives, flammability, oxidizer, etc. At this point, proper labing will be completed.

Thank you for your consideration in this matter.

Yours very truly,

Robert J. Bedore
Vice President

RJB:lp

INTRODUCTION

Universal Waste & Transit is enclosing a completed "Application For A Hazardous Waste Permit" in accordance with Chapter 17-30 of the Florida Administrative Code.

Universal Waste & Transit intends to operate a hazardous waste storage and treatment facility at the address indicated below:

2002 Orient Road
Tampa, Florida 33619

The intent of this facility is to store hazardous waste for subsequent on-site treatment or shipment off-site to licensed hazardous waste treatment and/or disposal facilities. The proposed treatment at this location will include:

- solidification

Universal Waste & Transit will make every effort to assist local industries in the management of their waste materials. We are placing specific emphasis on the small business sector and small quantity generators within this area who require environmentally sound waste management practices at economically affordable prices.

Included as Attachment 1 is a list of potential hazardous waste generators in the Hillsborough County area which Universal Waste & Transit anticipates servicing.

Volume I

PART I - GENERAL FACILITY INFORMATION

A. GENERAL INFORMATION

All general information is included on the State of Florida, Department of Environmental Regulation, "Application for a Hazardous Waste Facility Permit" (DER form 17-30-401(2)), effective October, 1987, which is included in this document as Attachment 2. All information included on this aforementioned form will be reiterated within this section. The Universal Waste & Transit (UWT) facility will be used for the storage of waste in containers and for physical/chemical treatment of hazardous waste.

This application is for an operating permit. The anticipated date for commencing operations is August, 1989.

The facility name and street address are indicated below:

Universal Waste & Transit, Inc.
2002 Orient Road
Tampa, Florida 33619

The mailing address for UWT is:
3400 East Lafayette
Detroit, Michigan 48207
Attention: Paul T. Sgriccia

The facility contact, operator and owner are:

Facility contact:	Paul Sgriccia (313) 567-4700
Facility operator:	Universal Waste & Transit, Inc. (813) 623-5302
Facility owner:	Universal Waste & Transit, Inc. (813) 623-5302

UWT is a licensed Florida corporation. The corporate charter is included as Attachment 3.

The site has been purchased and the purchase contract is attached. The landowner is:

Universal Transit Property Company
810 - 63rd Avenue North
St. Petersburg, Florida 33702

The engineer of record for the facility is:
James Winters, P.E., L.S.
Seminole Engineering
14483 62nd Street, North
Clearwater, Florida 34620

The facility is not located on Indian land.

An EPA identification number FLD 981 932 494 and a FDER construction permit number HC29-141782 have been issued.

PART I - GENERAL FACILITY INFORMATION

A. GENERAL INFORMATION

All general information is included on the State of Florida, Department of Environmental Regulation, "Application For A Hazardous Waste Facility Permit" (DER form 17-30-401 (2)),effective October, 1987, which is included in this document as Attachment 2. All information included on this aforementioned form will be reiterated within this section. The Universal Waste & Transit facility will be used for the storage of waste in containers and for physical/chemical treatment of hazardous waste.

Replaced

This application is for an operating permit. The anticipated date for commencing operations is August, 1989.

The facility name and street address are indicated below:

Universal Waste & Transit., Inc.
2002 Orient Road
Tampa, Florida 33619

The mailing address for Universal Waste & Transit. is:

2002 Orient Road
Tampa, FL 33619
(813) 623-5302

The facility contact; operator and owner are:

Facility contact/Operator:	Sharon Roehm (813) 623-5302
Facility owner	M.C. Carolan (813) 866-8579

Universal Waste & Transit is a licensed Florida corporation. The corporate charter is included as Attachment 3

The site has been purchased and the purchase contract is attached. The landowner is:

Universal Transit Property Company
810 - 63rd Avenue North
St. Petersburg, Florida 33702

The engineer of record for the facility is :
Mr. James Winters, P.E., L.S.
Seminole Engineering
14483 62nd St. North
Clearwater, FL 34620

The facility is not located on Indian land.

An EPA Identification Number FLD 981 932 494 and a FDER Construction Permit Number HC29-141782 have been issued.

B. SITE INFORMATION

Once again specific site information is included on the previously referenced application form and will be reiterated within this text.

1. FACILITY LOCATION

County: Hillsborough

Nearest Community: City of Tampa, Florida

Lattitude: 27 degrees; 57 minutes; 49 seconds; N

Longitude: 82 degrees; 22 minutes; 23 seconds; W

2. SITE AREA

The site is located on land having a total area of ~~1.4 acres~~ (MOL). The land was ~~previously undeveloped~~. No previous solid waste management units were located at this location. The Universal Waste & Transit facility is now located on this site.

3. TOPOGRAPHIC MAPS

The appropriate topographic maps are included in this submittal as Attachment 4.

No recorded drinking water wells are located within 0.25 miles of the proposed facility. A printout from the SWFWMD is included as Attachment 5.

No intake or discharge structures are located within 1 mile of the proposed facility. No injection wells are to be used at the proposed facility.

The surrounding land uses are industrial. These include chemical plants; construction offices; rendering plants; steel plants; railroad yards and gas manufacturing facilities. The City of Tampa zoning ordinance classifies this area zoned heavy industrial as suitable for hazardous waste facilities.

A complete site survey at a scale of 1 inch to 200 feet is included as Attachment 6. (included with the "As Built Construction Drawings)

An aerial photograph of the site at a scale of 1 inch to 2000 feet in included as Attachment 7.

A copy of the local wind rose is included as Attachment 8.

Complete facility "as built" drawings are included in the map tube.

4. FLOOD PLAIN

The site is located ~~outside~~ the 100 year flood plain. A map outlining the area of the site has been obtained from the Federal Emergency Management Agency indicating this fact and is included as Attachment 9. This fact is also certified on the site survey by a registered surveyor.

C. LAND USE INFORMATION

1. PRESENT ZONING

The site is located within Hillsborough County in an area which is zoned heavy industrial. The use of heavy industrial land for hazardous waste facilities is acceptable under the City of Tampa zoning code. The Tampa Bay Regional Planning Council (WFRPC), in 1985, performed in-depth evaluations to locate a suitable area for a hazardous waste storage and treatment facility. This area was among those chosen.

A building permit was obtained from Hillsborough County.

PRESENT USE

The present land use for this site and adjacent properties is heavy industrial.

D. OPERATING INFORMATION

1. SIC Codes

Waste material will be generated on site. The following SIC codes are representative of this operation:

9511

8734

2. DESCRIPTION OF THE FACILITY

(a.) Business Activities

Universal Waste & Transit, Inc. will operate a commercial hazardous waste storage and treatment facility at the proposed location. As indicated in Attachment 10, Universal Waste & Transit will have the potential to store a variety of waste materials. Many of these waste materials, however, will be present in small quantities which will result from the removal of overage laboratory chemicals or waste from small quantity generators.

A large volume of waste material to be stored or treated will emanate from local industries.

Universal Waste & Transit will offer a complete range of waste management services which will include:

- evaluation of existing industrial waste management practices
- sampling and analysis of waste materials
- packaging and/or containerization of waste products
- labeling and manifest preparation for the waste generator
- transportation
- storage and/or treatment of the waste
- annual report assistance for the waste generator

(b) Storage Facility

Universal Waste & Transit proposes to operate its storage & treatment facility within a 5,866 square foot building which will be specifically designed for hazardous waste management.

This permit application requests the following storage and treatment capacities:

- Drum Storage Capacity of 33,600 gallons
- Treatment via solidification of 2000 pounds per day

The total capacity within the building is 33,600 gallons which may consist of solids, filtrate and other stored containers.

A brief description of these storage & treatment processes are indicated below:

Universal Waste & Transit will store waste materials for either subsequent on-site treatment or for consolidation and transport to other off site treatment/disposal facilities. No on-site disposal will be performed.

All drummed waste material will be stored in Department of Transportation (DOT) acceptable containers in such a manner that detrimental co-mingling will not occur.

Revision No. 1 December, 1989

(b.) Storage Facility

Universal Waste & Transit proposes to operate its storage and treatment facility within a five thousand eight hundred and sixty six (5,866) square foot building which will be specifically designed for hazardous waste management.

This permit application requests the following storage and treatment capacities:

- drum storage capacity of 33,600 gallons
- treatment via solidification of up to 2000 pounds per day

A brief description of these storage and treatment processes are indicated below.

Universal Waste & Transit will store waste materials for either subsequent on-site treatment or for consolidation and transport to other licensed off site treatment/disposal facilities. No on-site disposal will be performed.

All drummed waste materials will be stored in Department of Transportation (DOT) acceptable containers in such a manner that detrimental co-mingling will not occur. replaced LRM

All drummed flammable and combustible waste materials will be stored in a separate area which has been specifically designed for this purpose. This area contains explosion proof wiring throughout the area; both primary and secondary fire suppression systems; automatic ventilation system; on-line explosivity monitoring; blow-out panels; explosion proof lighting; and similar safety and fire protection devices.

The storage facility has been specifically designed so as to insure protection of the environment. The floor is continuously poured concrete subsequently coated with an impervious urethane coating. The building design complies with both Southern Building Code and NFPA requirements.

The floors are sloped to containment sumps so that any leak can be readily contained, and to prevent co-mingling of incompatible wastes. A minimum of at least 10% containment is available with the containment sumps alone.

As previously indicated the maximum storage volume requested at the facility would be 33,600 gallons.

(c.) Treatment Facility

Universal Waste proposes to perform a variety of waste treatment at the facility. Our initial intent is to service the needs of local industry while making every attempt to insure maximum waste minimization and assisting industries in complying with the land ban restrictions.

All processes will be performed on a batch basis. No continous treatment processes are in place.

(c.1) Solidification

Solidification will be performed only when land disposal is required. The intent of Universal Waste is to employ off-site land disposal only when no other acceptable alternative is available.

The solidification process is labor intensive and requires very little sophisticated equipment.

Treatment is accomplished by pumping semi-solid waste into an air operated plate and frame filter press. Liquid/solid separation will take place within the press. The filtrate will be discharged to the sanitary sewer system (if acceptable) or transported off-site for acceptable disposal. The solid fraction will be consolidated for ultimate off-site land disposal.

A more detailed description of the solidification system is included in the Physical, Chemical or Biological Treatment section of this Volume.

find out what acceptable limits are and which city SEWER IS RECEIVING PLUS NEED ACCEPTANCE LETTER from POTW

(d.) Hazardous Waste to be Managed on Site

Universal Waste & Transit requests the capability to manage most waste materials currently regulated by both state and federal law. Granting of this request will allow Universal Waste & Transit the ability to remove most wastes generated within Florida to licensed disposal facilities. This will aid not only small quantity generators but will also be of tremendous help in the successful management of household hazardous waste. It should be noted that the quantities requested for many of these wastes are quite low reflecting our estimates that only minimal quantities of certain wastes will be accepted on an annual basis.

The attached listing of waste materials anticipated at the proposed facility is included as Attachment 10. These items are listed by USEPA Hazard Code Number.

(e.) Estimated Annual Quantities of Hazardous Waste

The estimated annual quantity of hazardous waste to be managed at the facility varies substantially with any particular waste material, for example Universal Waste & Transit anticipates managing a substantial volume of EP Toxic liquids, sludges and solids but anticipates only minimal quantities of the acutely toxic wastes.

It should also be noted that some overlap occurs when estimating quantities of hazardous waste, for example, wastes in the D-001 category overlap with those in the F-003; F-004; F-005 categories. These overlaps will be noted in the attachment addressing hazardous waste quantities. The list of USEPA Hazardous Waste Codes; their waste type and the estimated annual quantity of waste managed at Universal Waste & Transit is included as Attachment 10.

The estimated quantities are as indicated below:

Annual total waste estimate:

- 377,100 gallons

STORAGE OF WASTE IN TRAILERS

UW&T plans to operate the trailer storage under the Florida transfer facility regulations as specified in FAC 17-730.171, UW&T plans to use the trailers only for staging waste prior to off-site removal. Large volumes of containerized waste will not be held in storage trailers. It is estimated that no more than two such storage trailers will be available for transfer activities. At maximum capacity this would mean 160 drums could be held within the transfer trailers.

UW&T has notified the FDER of its intention to operate a transfer facility for these storage trailers. All requirements for transfer facilities under FAC 17-730.171 have been met. FDER has notified UW&T that those submittals are acceptable.

All waste within the storage trailers will be managed as required by Department of Transportation Regulations.

(f.) Waste Handling Procedures and Equipment Required

Outlined below are the procedures and steps involved in the successful management of waste materials at Universal Waste & Transit from the time of initial generator contact through removal of the waste material to licensed off-site treatment or disposal facilities:

1. initial contact by waste generator

2. generator required to complete and sign a Universal Waste & Transit Waste Data Sheet

3. sampling of the waste and subsequent analyses is the responsibility of the generator.

4. the completed Universal Waste & Transit Waste Data Sheet and a sample of the waste must be submitted to Universal Waste & Transit prior to waste approval, (lab packs require a complete packing list in lieu of samples)

5. analytical data reviewed by Universal Waste & Transit staff chemist

6. internal decision made as to whether the waste will be accepted at Universal Waste & Transit

7. if accepted, a date for pickup is scheduled with the generator

8. UW&T field personnel arrives at generator's site at which time all containers are inspected to insure compliance with Department of Transportation (DOT) Regulations and quality control samples are obtained.

9. if the container is unacceptable by either DOT standards or facility permit standards a decision will be made by the generator as to whether the contents will be transferred to new containers; overpacked; or left on site.

10. if visual observations of the quality control samples do not comply with the completed profile sheet (such as physical state; color change; etc.) the container will be rejected immediately.

11. all acceptable containers will be labeled and manifested in accordance with DOT regulations.

12. waste materials will be removed from the generator's site and transported via the most direct route to Universal Waste & Transit.

13. waste arrives at UW&T loading dock area.

14. containers reinspected to insure no damage in transit.

storage in tanks is not authorized

15. containers are placed in appropriate storage locations or bulk waste placed in appropriate tank

16. quality control samples are analyzed to verify Profile Sheet analyses.

17. if off-specification containers are discovered the generator will be immediately notified and the appropriate actions taken. The original manifest will be signed and returned to the generator.

18. all appropriate data will be logged onto the Universal Waste & Transit computer system.

19. approval for ultimate treatment and/or disposal will be obtained.

20. the waste will be scheduled for treatment and/or reshipment.

21. the waste material will be treated if deemed necessary.

22. all wastes will be ultimately transported to the appropriate off-site disposal facility.

23. the waste be will removed from current inventory.

(g.) Required Equipment

The items required for the successful completion of these tasks are shown below:

- storage/treatment facility
- drum trucks
- drum de-header
- bung wrenches
- non-sparking tools
- drum pumps
- air powered diaphragm pumps
- patay drum pump (non-sparking)
- air compressor
- empty containers (5, 20, 30, 55, 85, 110 gallon)
- personnel protective equipment
- spill cleanup equipment
- miscellaneous handtools
- straight trucks (incoming waste)
- semi-tractor trailers (outgoing waste)

3. PROCESS AND PROCESS CODES

All regulated wastes which will be managed at the facility as well as estimated annual quantities; USEPA Code Number; and process code are included on Attachment 10. Please note that it is difficult, if not impossible, to know which wastes will enter the facility in a form amenable to treatment.

4. TRAFFIC PATTERNS & TRAFFIC CONTROL

As shown on the "as built" drawings and reiterated in the Security section of Volume 1 the ~~only entrance to the~~ facility is through a ~~lockable gate~~ located on the entrance road. All ingress and egress traffic at the facility must pass through this gate. Since this gate is the only entrance/exit at the facility the only ~~access road is 9th~~ Avenue.

No activities have occurred at this site prior to submittal of this application and therefore we can only estimate the forthcoming truck traffic. However, we are estimating that no more than ~~three twenty four foot vans will enter~~ the facility on a daily basis. We are estimating that ~~five semi tractor trailors~~ will depart the facility on a weekly basis. Normal operating hours are from ~~7:00 a.m. to 6:00 p.m.~~ however vehicles may enter or exit the facility at other times for emergency situations or unexpected deliveries.

All vehicular traffic which exists the facility is controlled by a stop sign at the entrance/exit gate. Traffic will then turn left on 9th Avenue to Orient Road. Vehicles will then turn left on Orient Road and continue to Interstate 4. A secondary truck route would be:

9th Avenue to Orient Road

Right on Orient Road to S.R. 60

Right on S.R. 60 to 50th Street

Left on 50th Street to the Crosstown Expressway

All roadways are comprised of the following:

- 8" limerock base primed & compacted to 98% max. density
- 2" type S-1 asphaltic concrete

The minimum load bearing capacity is 2500 psi at 95% of standard Procter

As indicated on the "as built" drawings about 100 feet is available for the truck turnaround area. The American Institute of Architects in the Architectural Reference Standards, 7th Edition; states that a 55 foot semi-tractor trailer requires only a 50 foot practical turning radius for a 180 degree turn. More than sufficient room exists at the Universal Waste facility.

PART II

A. GENERAL

1. TOPOGRAPHIC MAP

Since topographic maps at a scale of 1 inch to 200 feet are not available from the United States Geological Survey, a site survey was performed by a registered surveying company.

A complete facility drawing at a scale of 1 inch to 50 feet has also been included with the "as built" drawings. This survey and facility drawing show the orientation of the map; access control; building and structures; contours; loading; drainage areas; run-off control system;ingress and egress roadways; legal description of the property and associated site data.

As previously addressed a seperate flood plain map obtained from the Federal Emergency Management Agency has been included as Attachment 9.

The required wind rose has been previously addressed as being included as Attachment 8.

2. FINANCIAL RESPONSIBILITY

A. CLOSURE COST ESTIMATE

A complete Closure Plan is included within Volume 1. Our most recent closure cost estimate for the facility is $83,748.10

A financial guarantee bond in that amount will be negotiated with the National Union Fire Insurance Company of Pittsburgh, Pennsylvania, or similar vendor. A standby trust fund agreement will be provided by First Florida Bank of Tampa, Florida, or similar financial institution. These financial assurance documents will be in place and the originals filed with the Hazardous Waste Financial Responsibility Coordinator at least 60 days prior to the acceptance of any waste at the facility. Copies of these documents will be filed with the Department of Environmental Regulation's Tampa office at that time.

B. POST CLOSURE COST ESTIMATE

No post closure care is required for the proposed facility.

Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

M E M O R A N D U M

TO: Universal Waste & Transit Inc.

EPA ID: FLD-981-932-494

FROM: Linda Lakes, Hazardous Waste Management Section

DATE: November 8, 1989

SUBJECT: Hazardous Waste Transporters Financial Responsibility

POLICY NUMBER: NK-125-8703

The Florida Department of Environmental Regulation has received and processed the forms you have filled out in compliance with Florida's hazardous waste transporter financial responsibility requirements. The forms have been properly completed and will remain in our files.

You are reminded that the insurance policy, including all endorsements must be maintained at the carrier's principal place of business and a signed du cate original of the policy and all endorsements may be requested by the Secretary of the Florida Department of Environmental Regulation.

Evidence of financial responsibility must be verified annually by submission of a revised 17-30.900(5) form or by submission of a certificate of insurance. If a certificate of insurance is used it must include a certification by the insurer that the original insurance policy and all endorsements are still in effect.

Cancellation of the insurance, whether by the Insurer or the Insured, and any other termination of the insurance (e.g., expiration, non-renewal), will be effective only upon written notice and only after the expiration of thirty-five (35) days after a copy of such written notice is received by the Secretary of the FDER as evidenced by certified mail return receipt. In addition, if your insurance agent should change, new forms must be completed and submitted to the department.

Any changes in your existing hazardous waste transporter liability coverage should be submitted to:

Linda Lakes
Hazardous Waste Management Program
Florida DER
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-0300

L/

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

September 13, 1989

Mr. Robert Bedore
President
Universal Waste & Transit, Inc.
1923 Frederick Street
Detroit, Michigan 48211

RE: FLD 981 932 494 - Universal Waste & Transit - Tampa, Florida

Dear Mr. Bedore:

Thank you for the quick response to my August 11 letter requesting additional information involving the Standby Trust Fund Agreement with Michigan National Bank and the Hazardous Waste Facility Liability Endorsement/Certificate filing requirements. The Exhibit A and Certification of Acknowledgment received with Mr. Edward M. Bedikian's letter were reviewed and found to be in order. The Hazardous Waste Facility Endorsement and Certificate of Liability Insurance from American Home Assurance Company were also reviewed and found to be in order.

Therefore, Universal Waste & Transit, Inc. is in compliance with the financial assurance and liability requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Rule 17-730.180 Florida Administrative Code.

If you have any questions or need any additional information, call me at (904) 488-0300.

Sincerely,

Fred J. Wick

Fred J. Wick
Environmental Specialist

FJW/mkr
cc: Alan Farmer
Rabin Prusty
Bill Crawford
Edward M. Bedikian

C. LIABILITY INSURANCE

Universal Waste & Transit has now obtained the required liability coverage. Included as Attachment 11 is a statement that all required liability coverage will be in place at least 60 days prior to any waste acceptance.

The appropriate State of Florida, DER forms have been completed and filed with the Hazardous Waste Financial Responsibility Coordinator.

3. FLOOD PRONE AREAS

The Universal Waste & Transit hazardous waste storage and treatment facility is located in Flood Zone C as indicated on the Federal Emergency Management Agency Map included as Attachment 9. The entire site is located outside of the 100 year Flood Plane Zone.

The facility is also located outside of the hurricane storm surge zone.

4. FACILITY SECURITY

(a.) SECURITY PROCEDURES AND EQUIPMENT

As indicated in Construction Drawing C-1, the active portion of the Universal Waste & Transit facility is fully fenced. A seven foot high fence encircles the active portion of the site. There is controlled access to the site by means of a double lockable gate. Entrance to the active portion of the facility can be accomodated only through this gate entrance.

Posted at the gate and on the fence surrounding the facility are signs with the following legend:

"DANGER- UNAUTHORIZED PERSONNEL KEEP OUT"

The legend on this sign is in both English and Spanish.

The facility is monitored by an automatic alarm system for fire. If the system is activated the City of Tampa Fire Department will be automatically notified.

During all non-working hours the gate will be locked. During working hours the gate will remain closed but not locked. Working hours are defined as 7:00 a.m. to 6:00 p.m.. Activity can occur at the facility at times other than those identified as normal working hours. For example during emergency response situations or for special deliveries.

1B. CONTINGENCY/EMERGENCY RESPONSE PLAN

The Universal Waste & Transit, Inc. (UWT) Contingency/Emergency Response Plan as required by 40 CFR 264, Subpart D is included as Volume 2 of this submittal.

Copies of the UWT Contingency/Emergency Response Plan have been submitted to the following agencies for review and approval:

City of Tampa Police Department
City of Tampa Fire Department
Hillsborough County Hazardous Materials Response Team
United States Coast Guard
Westinghouse Remediation Services, Inc. - Tampa
Humäna Hospital - Brandon
Doctor's Hospital

Signed receipt forms from those agencies are attached to the Contingency/Emergency Response Plan (Volume 2, Attachment 8).

1B. CONTINGENCY PLAN

The Universal Waste & Transit Contingency Plan as required by 40CFR 264, Subpart D is included as Volume 2 of this submittal.

Copies of the Universal Waste & Transit Contingency Plan have been submitted to the following agencies for review and approval:

City of Tampa Police Department

City of Tampa Fire Department

Hillsborough County Hazardous Materials Response Team

United States Coast Guard

Westinghouse - HazTech

Humana Hospital - Brandon

Centro Espanol Memorial Hospital

Signed receipt forms from those agencies are attached to the Contingency Plan (Volume 2, Attachment 8).

REPLACED

C. SAFETY PROCEDURES, STRUCTURES AND EQUIPMENT

(1) POWER OUTAGES AND EQUIPMENT FAILURE

Universal Waste & Transit houses the active portion of the storage and treatment operation within a 5,866 square foot concrete and metal building. All container storage (over 10 days) and all treatment of hazardous waste occurs within the confines of this building.

Based upon the proposed uses of this facility (limited treatment and storage) there will be only a minimal effect upon our operations in the event of a power outage or equipment failure.

There are no continuous treatment processes. All treatment will be on a batch basis.

The filter press to be employed operates on a hydraulic closing basis which is pneumatically operated. There are no electrical components. Only low volumes of in-plant compressed air are required. The automatic feed pump control system allows the system to be automatically shutdown when the press is filled. Also incorporated is a low hydraulic pressure safety shutdown device. Any time the hydraulic pressure drops below a preset limit the system will completely shutdown eliminating any possible leakage.

In the event of a power outage the main electrical disconnect would be placed in the "OFF" position. This will insure that no operations would commence until a complete review by the facility manager or his/her representative.

Other than interior lighting no electrical requirements are needed for the storage of hazardous waste at this facility. Emergency lighting has been installed as required by the National Fire Protection Association (NFPA). All fire detection devices such as smoke detectors, flame detectors, and explosivity meters are equipped with backup battery powered electrical systems to insure their operation in the event of an inadvertant loss of power to the facility.

It is doubtful that any liquid transfer would be required during a power outage,however, all pumps are operated by compressed air, should that need arise. No electrical equipment is required for drum movement.

The inadvertant loss of power to any portion of this facility would not cause potential harm to human health or the environment.

TELEPHONE (813) 988-4600

D.E.R.

DEC - 7 1989

SOUTHWEST DISTRICT TAMPA

SECKMAN FIRE SPRINKLERS, INC.

7910 PROFESSIONAL PLACE • TAMPA, FLORIDA • 33637

THIS AGREEMENT made and executed in duplicate original by and between SECKMAN FIRE SPRINKLERS, INC., hereinafter called Corporation and Universal Waste & Transit, Inc. hereinafter called Customer.

W I T N E S S E T H

1. In consideration of the sum of $ 300.00 per annum, Corporation agrees to inspect the automatic fire extinguishing equipment and adjuncts on premises owned or occupied by Customer which are located at 2501 North Orient Road, Suite A, Tampa, Florida 33619 and being more particularly described as follows: Fire Sprinkler System

2. The Corporation shall inspect the above described equipment and adjuncts 4 times during each twelve month period hereunder, and shall make a written report to Customer following each inspection made.

3. Inspection reports to Customer shall include what items of maintenance, repairs, and replacements, if any, are necessary, in the Corporation's judgement, to maintain same in good working order.

4. The annual inspection fee of Corporation shall be paid immediately following the first inspection made, and is payable annually thereafter.

5. This agreement shall be effective for a period of one (1) year from date and shall be automatically renewed each year unless terminated by mutual agreement or by a thirty (30) days written notice by either party to the other.

6. Any work, other than inspection, shall be done at the written request of Customer as evidenced by letter, purchase order, authorized work order ordering charges for the additional work requested.

7. The Corporation shall inspect any additional fire extinguishing equipment or adjuncts added during the effective term of this agreement and Customer shall pay an additional inspection fee commensurate with the additional inspection work to be performed. A new contract shall be executed by the parties to show all items to be inspected and the adjusted annual inspection fee.

8. The Corporation shall have the right to enter the premises of Customer at all reasonable times and hours for the purposes of performing the work designated herein.

Pamela K. Day

Customer Pam Day

Customer's Mailing Address:

2501 North Orient Road/Suite A

Tampa, Florida 33619

SECKMAN FIRE SPRINKLERS, INC.

By: Brian R. Boyer

Approved: Brian R. Boyer, Service Manager

COMMERCIAL SALES PROPOSAL/AGREEMENT

Form 2881-00B

Date June 20, 1989

ADT Security Systems, Mid-South, Inc.

Address: 1107 West North A Street
Tampa, FL 33606

Tel. No. 813-251-4888

To: (Customer Name and Address)

Universal Waste & Transit Inc.
2501 North Orient Road, Suite A
Tampa, FL 33619

Attn: George P. Phelps Tel. No. 813-623-5302

ADT proposes to install or cause to be installed the equipment and furnish the services indicated herein:

QTY.	DESCRIPTION	LOCATION (BE SPECIFIC)
1	Focus 45 8-Zone Digital Control Set	
1	Stand-by Power Supply	
1	Touch Pad On/Off Device	
1	Dual Line Communicator	
5	Exterior Pedestrian Door Contacts	
2	Exterior Pedestrian Explosion Proof Door Contacts	
1	Exterior Audible/Strobe Alarm	
2	RJ31X Phone Jacks	

All Labor, Ridge Conduit, Standard Conduit Connectors, Boxes and Miscellaneous Hardware

Cancellation charge based upon good service. RER RJB

If subcontractors are used, Universal Waste has the option to authorize. RER, RJB

If Universal Waste moves, cancellation charge is waived. RER RJB

The above system will be City of Tampa approved for fire alarm monitoring. RER - RJB

D.E.R.

DEC - 7 1989

SOUTHWEST DISTRICT TAMPA

Type of Transaction

☐ Direct Sale (equipment to become property of the Customer upon payment of Selling Price indicated below in full).

■ System to remain property of ADT.

ADT may remove or upon written notice to the Customer, abandon in whole or in part, all devices, instruments, appliances, cabinets, and other materials associated with the system, upon termination of this agreement, without obligation to repair or redecorate any portion of the Customer's premises upon such removal, and the removal or abandonment of such materials shall not be held to constitute a waiver of the right of ADT to collect any charges which have been accrued or may be accrued hereunder.

Services To Be Provided	P - Provided NP - Not Provided (Circle One)
Central Station Signal Receiving and Notification Service	(P) NP
■ Fire Alarm ☐ Hold Up Alarm	
■ Burglar Alarm ☐ Duress	
☐ Supervisory ☐ Other _____	
Direct Connection Service	P (NP)
To _____	
Using:	
■ Digital Communicator	
☐ Leased Line	
☐ Derived Local Channel	
☐ Telephone Charges Not Included In ADT Billing	
Maintenance	(P) NP
Investigator Response ☐ Interior ☐ Exterior	P (NP)
Supervised/Scheduled Opening/Closing	P (NP)
Opening/Closing Logging	P (NP)
Opening/Closing Reports	P (NP)
Other _____	P (NP)
If Maintenance Service is declined, Customer please initial here.	

Installation $1295.00 payable _____ acceptance of this proposal and the balance payable upon completion of the installation. In addition for the service(s) to be provided as indicated above, Customer agrees to pay $ _____

$900.00 Annually ~~$300.00~~ $225.00 Billed Quarterly

per annum, annually in advance for a period of five years effective from the date service is operative under this agreement. After the five years, this agreement shall be automatically renewable yearly unless terminated by either party upon written notice at least 30 days prior to the anniversary date. ADT shall have the right to increase the annual service charge after 1 year.

In the event of termination prior to the end of the contract term, the Customer agrees to pay, in addition to any charges for services rendered prior to termination, 40% of the service charge remaining to be paid for the unexpired term of the agreement.

The Customer agrees to pay, in addition to the service charges above, any false alarm assessments, taxes, fees or charges that are imposed by any governmental body, relating to the installation or service provided under this Agreement and to pay any increase in charges to ADT for facilities required for transmission of signals under this Agreement.

In the event ADT's representative is sent to the Customer's premises in response to a service call or alarm signal caused by the Customer improperly following operating instructions or, failing to close or properly secure a window, door or other protected point, or improperly adjusting monitors or accessory components, there shall be a service charge to the Customer.

Failure to pay amounts when due shall give ADT in addition to any other remedies, the right to charge interest at the highest legal rate on the delinquent amounts. Customer agrees to pay all costs, expenses and fees of ADT's enforcement of this Agreement, including collection expenses, court costs, and attorneys' fees.

Installation charge quoted in this agreement is based on ADT performing the installation with its own personnel. If for any reason this installation must be performed by outside Contractors, said installation charge shall be subject to revision.

Customer warrants that the Customer owns the premises in which the equipment is being installed or that Customer has the authority to engage ADT to carry out the installation in the premises.

By Bob Ronella Agent

Approved _____ Authorized Representative of ADT

Customer Acceptance

In accepting this Proposal, Customer agrees to the terms and conditions contained herein including those on the reverse side. It is understood that they shall prevail over any variation in terms and conditions on any purchase order or other document that the Customer may issue. Any changes in the system requested by the Customer after the execution of this Agreement shall be paid for by the Customer and such changes shall be authorized in writing.

ATTENTION IS DIRECTED TO THE WARRANTY, LIMIT OF LIABILITY AND OTHER CONDITIONS ON REVERSE SIDE.

Signature

Vice President 6/29/89

Title Date

This Agreement is not binding unless approved in writing by an authorized Representative of ADT. In the event of failure of such approval, the only liability of ADT shall be to return to the Customer the amount, if any, paid to ADT upon signing of this Agreement.

TERMS AND CONDITIONS

A. Signal Receiving and Notification Service shall be provided by ADT if the reverse side of this Agreement includes a charge for Signal Receiving and Notification Service and in the event an alarm signal registers at ADT's Central Station, ADT shall endeavor to notify the appropriate Police or Fire department and the designated representative of the Customer. In the event a supervisory signal or trouble signal registers at ADT's central station, ADT shall endeavor to notify promptly the designated representative of the Customer.

In the event ALARM VERIFICATION SERVICE is being furnished, it is mutually understood and agreed that equipment is being installed which, as to certain locations in the premises, will require the activation of two sensing devices, or a second activation of a single alarm sensor, or a continuous alarm event from a single sensor, in order for an alarm signal to be transmitted.

It is mutually agreed that the Customer assumes full responsibility for the operation of any and all bypass or switch units provided for disconnecting or reconnecting the alarm sounding and/or transmitting equipment at Customer's premises.

The Customer represents that any vault to be protected by ADT hereunder by sound or vibration detector systems has the minimum construction characteristics prescribed by the Underwriters' Laboratories, Inc.

The Customer agrees to test any ultrasonic, microwave, capacitance or other electronic equipment designated on the Schedule of Protection prior to setting the alarm system for closed periods, according to procedures prescribed by ADT, and to notify ADT promptly in the event that such equipment fails to respond to the test.

Communication Facilities - A. AUTHORIZATION - Customer authorizes ADT to make requests for information, service, orders or equipment in any respect on behalf of Customer to a telephone company (the "Telephone Company") or other entity providing facilities or services for transmission of signals under this Agreement. B. DIGITAL COMMUNICATOR - If connection to the ADT Central Station is to be by Digital Communicator, the Customer agrees to provide a connection via a registered telephone jack to a telephone channel required for the ADT equipment. Such connection shall be electrically first before any other telephone or Customer equipment, and shall be within 10 feet of the ADT Control Panel. If requested by the Customer, ADT shall provide such connection at the cost of the Customer. The Customer understands that if a digital communicator is installed under this Agreement, it uses standard telephone lines as the transmission mode of sending signals and eliminates the need for dedicated telephone facilities and the large cost increases frequently imposed on such facilities. **Customer also understands that ADT does not receive signals when the transmission mode is or becomes non-operational and that signals from the digital communicator cannot be received if the transmission mode is cut, interfered with or otherwise damaged.** C. DERIVED LOCAL CHANNEL - The facilities and services provided by the Telephone Company, in connection with the services to be provided to the Customer hereunder, include what is generally described as Derived Local Channel service (and which may be provided under specific service marks or service names of individual Telephone Companies). Those facilities and services relate to the provision of lines, signal paths, scanning and transmission. The Customer agrees that the liability of the Telephone Company is limited in accordance with, and the Telephone Company may invoke, the provisions of Paragraph E of this Agreement.

B. **Warranty:** If direct sale is indicated on the reverse side, any part of the system, including the wiring, installed under this Agreement which proves to be defective in material or workmanship within ninety (90) days of the date of completion of installation will be repaired or replaced at ADT's option with a new or functionally operative part. Labor and material required to repair or replace such defective components will be free of charge for a period of ninety (90) days following the completion of the original installation.

This Warranty does not apply to the conditions listed below and in the event Customer calls ADT for service under the Warranty and upon inspection by ADT's representative it is found that one of these conditions has led to the inoperability or apparent inoperability of the system, a charge will be made for the service call of ADT's representative whether or not he actually works on the system. Should it actually be necessary to make repairs to the system due to one of the "Conditions" not covered by Warranty, a charge will be made for such work at ADT's then applicable rates for labor and material. Service will be furnished by ADT during its normal working hours, 8:00 A.M. to 4:30 P.M., Monday through Friday, except holidays.

Conditions not covered by Warranty: A) Damage resulting from accidents, acts of God, alteration, misuse, tampering or abuse. B) Failure of the Customer to properly follow operating instructions provided by ADT at time of installation or at a later date. C) Adjustments necessitated by misalignment of CCTV cameras, improper adjustment of monitor brightness and contrast tuning dials or insufficient light on the area viewed by the camera(s). D) Trouble due to interruption of commercial power or to the phone service.

THE FOREGOING WARRANTY IS IN LIEU OF ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. THE PURCHASER'S EXCLUSIVE REMEDY WITH RESPECT TO ANY AND ALL LOSSES OR DAMAGES RESULTING FROM ANY CAUSE WHATSOEVER, INCLUDING ADT'S NEGLIGENCE, SHALL BE REPAIR OR REPLACEMENT AS SPECIFIED ABOVE. ADT SHALL IN NO EVENT BE LIABLE FOR ANY CONSEQUENTIAL OR INCIDENTAL DAMAGES OF ANY NATURE, INCLUDING WITHOUT LIMITATION, DAMAGES FOR PERSONAL INJURY OR DAMAGES TO PROPERTY, AND HOWEVER OCCASIONED, WHETHER ALLEGED AS RESULTING FROM BREACH OF WARRANTY OR CONTRACT BY ADT OR NEGLIGENCE OF ADT OR OTHERWISE.

C. **Maintenance** — If the reverse side of this agreement indicates this service is being provided, ADT will inspect and test the system, and bear the expense of all ordinary maintenance and repair of said system due to normal wear and tear. The expense of all extraordinary maintenance and repair due to alterations in the Customer's premises, alterations of the system made at the request of the Customer, or made necessary by changes in the Customer's premises, damage to the premises or to the alarm system, or to any cause beyond the control of ADT, shall be borne by the Customer. The Customer agrees to furnish any necessary electric current through the Customer's meter and at the Customer's own expense with an outlet within 10 feet of the ADT Control Panel. It is mutually agreed that the work of installation and ADT's periodic inspections, repairs and tests of the system shall be performed between the hours of 8:00 A.M., and 4:30 P.M., exclusive of Saturdays, Sundays and holidays.

EXCLUSIONS: Maintenance on the following devices will be provided only on a time and material basis: (1) window foil, (2) security screens, (3) any exterior mounted devices, (4) PROM (Programmable Read Only Memory), (5) Conditions not covered by warranty listed above in paragraph B.

It is understood and agreed that ADT's obligation relates to the maintenance solely of the specific protection system, and that ADT is in no way obligated to maintain, repair, service, replace, operate or assure the operation of any device or devices of the Customer or of others not installed by ADT.

If not contracted for before the expiration of the Warranty, ADT will enter into a Maintenance Service Contract only after inspecting the system and making any necessary repairs or replacements to the system at a charge to the Customer for labor and/or material at ADT's then prevailing rates.

D. IF INVESTIGATOR RESPONSE SERVICE is being furnished as indicated on the reverse side, the levels available are as follows:

Level I—Exterior Investigation: Upon receipt of a burglar alarm signal from the Customer's premises, ADT, in addition to notifying the Police Department as indicated above, will endeavor to notify the Customer's designated representative and also dispatch a representative to the Customer's premises. The representative will make an investigation of the exterior of the premises from his vehicle. At the conclusion of the representative's investigation, ADT will notify the Customer's designated representative of the results of the investigation.

Level II—Interior Investigation: Upon receipt of a burglar alarm signal from the Customer's premises, ADT, in addition to notifying the police department as indicated above, will dispatch a representative. The representative will conduct an exterior investigation and then enter the Customer's premises with keys which must be provided by the Customer and make an interior investigation. However, if there is evidence of an attack, the ADT representative will terminate his investigation until the police arrive. The Customer's representative will then be notified if there has been an attack. Otherwise a notice of the alarm will be left at the control unit.

For either level of investigation, the Customer authorizes and directs ADT to cause the arrest of any person or persons unauthorized to enter his premises and to hold him or them until released by the Customer or an authorized known representative, and in such cases to indemnify ADT against any liability, cost or expense in consequence of such arrest.

If the Customer requests that the ADT Representative remain at the premises pending Customer's arrival, and ADT agrees to comply, the Customer will be charged at ADT's then prevailing rate for labor.

E. IT IS UNDERSTOOD THAT ADT IS NOT AN INSURER, THAT INSURANCE, IF ANY, SHALL BE OBTAINED BY THE CUSTOMER AND THAT THE AMOUNTS PAYABLE TO ADT HEREUNDER ARE BASED UPON THE VALUE OF THE SERVICES AND THE SCOPE OF LIABILITY AS HEREIN SET FORTH AND ARE UNRELATED TO THE VALUE OF THE CUSTOMER'S PROPERTY OR PROPERTY OF OTHERS LOCATED IN CUSTOMER'S PREMISES. ADT MAKES NO GUARANTY OR WARRANTY, INCLUDING ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS, THAT THE SYSTEM OR SERVICES SUPPLIED, WILL AVERT OR PREVENT OCCURRENCES OR THE CONSEQUENCES THEREFROM, WHICH THE SYSTEM OR SERVICE IS DESIGNED TO DETECT. IT IS IMPRACTICAL AND EXTREMELY DIFFICULT TO FIX THE ACTUAL DAMAGES, IF ANY, WHICH MAY PROXIMATELY RESULT FROM FAILURE ON THE PART OF ADT TO PERFORM ANY OF ITS OBLIGATIONS HEREUNDER. THE CUSTOMER DOES NOT DESIRE THIS CONTRACT TO PROVIDE FOR FULL LIABILITY OF ADT AND AGREES THAT ADT SHALL BE EXEMPT FROM LIABILITY FOR LOSS, DAMAGE OR INJURY DUE DIRECTLY OR INDIRECTLY TO OCCURRENCES, OR CONSEQUENCES THEREFROM, WHICH THE SERVICE OR SYSTEM IS DESIGNED TO DETECT OR AVERT; THAT IF ADT SHOULD BE FOUND LIABLE FOR LOSS, DAMAGE OR INJURY DUE TO A FAILURE OF SERVICE OR EQUIPMENT IN ANY RESPECT, ITS LIABILITY SHALL BE LIMITED TO A SUM EQUAL TO 10% OF THE ANNUAL SERVICE CHARGE OR $1,000, WHICHEVER IS GREATER, AS THE AGREED UPON DAMAGES AND NOT AS A PENALTY, AS THE EXCLUSIVE REMEDY; AND THAT THE PROVISIONS OF THIS PARAGRAPH SHALL APPLY IF LOSS, DAMAGE OR INJURY, IRRESPECTIVE OF CAUSE OR ORIGIN, RESULTS DIRECTLY OR INDIRECTLY TO PERSON OR PROPERTY FROM PERFORMANCE OR NONPERFORMANCE OF OBLIGATIONS IMPOSED BY THIS CONTRACT OR FROM NEGLIGENCE, ACTIVE OR OTHERWISE, OF ADT, ITS AGENTS OR EMPLOYEES. NO SUIT OR ACTION SHALL BE BROUGHT AGAINST ADT MORE THAN ONE (1) YEAR AFTER THE ACCRUAL OF THE CAUSE OF ACTION THEREFOR. IT IS FURTHER AGREED THAT THE LIMITATIONS ON LIABILITY, EXPRESSED HEREIN, SHALL INURE TO THE BENEFIT OF AND APPLY TO ALL PARENT, SUBSIDIARY AND AFFILIATED ADT COMPANIES. IF THE CUSTOMER DESIRES ADT TO ASSUME A GREATER LIABILITY, ADT SHALL AMEND THIS AGREEMENT BY ATTACHING A RIDER SETTING FORTH THE AMOUNT OF ADDITIONAL LIABILITY AND THE ADDITIONAL AMOUNT PAYABLE BY THE CUSTOMER FOR THE ASSUMPTION BY ADT OF SUCH GREATER LIABILITY PROVIDED, HOWEVER, THAT SUCH RIDER AND ADDITIONAL OBLIGATION SHALL IN NO WAY BE INTERPRETED TO HOLD ADT AS AN INSURER. IN THE EVENT ANY PERSON, NOT A PARTY TO THIS AGREEMENT, SHALL MAKE ANY CLAIM OR FILE ANY LAWSUIT AGAINST ADT FOR FAILURE OF ITS EQUIPMENT OR SERVICE IN ANY RESPECT, CUSTOMER AGREES TO INDEMNIFY AND HOLD ADT HARMLESS FROM ANY AND ALL SUCH CLAIMS AND LAWSUITS INCLUDING THE PAYMENT OF ALL DAMAGES, EXPENSES, COSTS AND ATTORNEY'S FEES. IF THIS AGREEMENT PROVIDES FOR A DIRECT CONNECTION TO A MUNICIPAL POLICE OR FIRE DEPARTMENT, OR OTHER ORGANIZATION, THAT DEPARTMENT OR OTHER ORGANIZATION MAY INVOKE THE PROVISIONS HEREOF AGAINST ANY CLAIMS BY THE CUSTOMER DUE TO ANY FAILURE OF SUCH DEPARTMENT OR ORGANIZATION.

F. In the event INTRUSION DETECTION SERVICE or WATCHMAN'S REPORTING SERVICE is furnished under this Agreement, the service will be provided in accordance with ADT's FORM NUMBER 837 or 839, which shall be attached to and made a part of this Agreement.

G. IF CCTV EQUIPMENT IS INVOLVED, Customer will provide adequate illumination under all operational conditions for the proper operation of the closed circuit television camera and will provide the 110 AC power supply where required as well as shelf or desk space for monitors.

H. A Direct Connection to the Municipal Police, Fire Department or other Agency shown shall be provided if the reverse side of this Agreement provides for such direct connect service.

It is mutually understood and agreed that signals transmitted hereunder will be monitored in Municipal Police and/or Fire Departments or other location and that the personnel of such Municipal Police and/or Fire Departments or other location are not the agents of ADT nor does ADT assume any responsibility for the manner in which such signals are monitored or the response, if any, to such signals.

I. At ADT's option, the Customer may be charged for any false alarm caused by the Customer or for any unnecessary service run.

J. **CANCELLATION**— If Central Station or Direct Connection is furnished, this Agreement may be terminated at the option of ADT if ADT's Central Station is substantially damaged by fire or catastrophe, or if ADT is unable to have connections or privileges necessary to transmit signals between the Customer's premises, ADT's Central Station or the Municipal Fire or Police Department or other agency and ADT shall not be liable for any damages or subject to any penalty as a result of such termination.

It is understood and agreed that this Agreement may be terminated by ADT in the event that the Customer fails to follow any recommendations ADT may make for the repair or replacement of defective parts of his system not covered under the Warranty or Maintenance Service Contract or in the event that the Customer's failure to follow the operating instructions provided by ADT results in an undue number of false alarms or if the premises in which the system is installed are so modified or altered after installation as to render continuation of service impractical.

ADT ASSUMES NO LIABILITY FOR DELAYS IN INSTALLATION OF THE EQUIPMENT, OR FOR INTERRUPTIONS OF SERVICE DUE TO STRIKES, RIOTS, FLOODS, FIRES, ACTS OF GOD OR ANY CAUSES BEYOND THE CONTROL OF ADT, AND WILL NOT BE REQUIRED TO SUPPLY SERVICE TO THE CUSTOMER WHILE INTERRUPTION OF SERVICE DUE TO ANY SUCH CAUSE SHALL CONTINUE.

L. This Agreement is not assignable by the Customer except upon written consent of ADT first being obtained. ADT shall have the right to assign this agreement or to subcontract any of its obligations under this agreement without notice to Customer.

M. If any of the provisions of this agreement shall be determined to be invalid or unenforceable, the remaining provisions shall remain in full force and effect.

N. THIS AGREEMENT CONSTITUTES THE ENTIRE AGREEMENT BETWEEN THE CUSTOMER AND ADT. IN EXECUTING THIS AGREEMENT, CUSTOMER IS NOT RELYING ON ANY ADVICE OR ADVERTISEMENT OF ADT. CUSTOMER AGREES THAT ANY REPRESENTATION, PROMISE, CONDITION, INDUCEMENT OR WARRANTY, EXPRESS OR IMPLIED, NOT INCLUDED IN WRITING IN THIS AGREEMENT SHALL NOT BE BINDING UPON ANY PARTY, AND THAT THE TERMS AND CONDITIONS HEREOF APPLY AS PRINTED WITHOUT ALTERATION OR QUALIFICATION, EXCEPT AS SPECIFICALLY MODIFIED IN WRITING. THE TERMS AND CONDITIONS OF THIS AGREEMENT SHALL GOVERN NOTWITHSTANDING ANY INCONSISTENT OR ADDITIONAL TERMS AND CONDITIONS OR ANY PURCHASE ORDER OR OTHER DOCUMENT SUBMITTED BY THE CUSTOMER.

BORRELL
FIRE SYSTEMS
SINCE 1947

November 27, 1989

Universal Waste and Transit, Inc.
2501 N. Orient Road, Suite A
Tampa, Florida 33619
Attention: Mr. Robert Bedore

RE: Executed Service Contract
Halon Fire Suppression System

Dear Mr. Bedore:

Enclosed is your executed copy of the Service Contract to perform semi-annual maintenance on the Halon Fire Suppression System installed at the above mentioned facility.

We will be in touch with you regarding a convenient time to perform your service.

Please feel free to call our office should you have any questions, or if we may be of service in any way.

Yours truly,

BORRELL FIRE SYSTEMS

Thomas L. Butler
Branch Manager

TLB:rms
Enclosures

BORRELL FIRE SYSTEMS
501 N. Newport Avenue
Tampa, Florida 33606-1325
(813) 254-3306 • FAX (813) 253-3190
FL WATS 1-800-282-6527

BORRELL FIRE SYSTEMS

BORRELL™

☐ **TAMPA BRANCH**
501 N. NEWPORT AVENUE
TAMPA, FLORIDA 33606
(813) 254-3306

☐ **ORLANDO BRANCH**
624 DOUGLAS AVENUE
SUITE 1404
ALTAMONTE SPRINGS, FLORIDA 32714
(407) 788-3335

☐ **POMPANO BEACH BRANCH**
1864 N.W. 21st STREET
POMPANO BEACH, FLORIDA 33069
(305) 974-9100

☑ **JACKSONVILLE BRANCH**
4110 SOUTHPOINT BOULEVARD
JACKSONVILLE, FLORIDA 32216
(904) 733-9477

Service Contract For Fire Protection Systems

I. This contract between Borrell Fire Systems, a Division of Borrell Electric Co., Inc., hereinafter designated as the CONTRACTOR, and Universal Waste and Transit hereinafter designated as the OWNER, covers the servicing and maintenance by the CONTRACTOR of the Fire Protection System(s) No.(s) installed in the:

Area or Department: North and South Non-flammable Storage F/A, Flammable Storage Foam System

of

Name of Company: Universal Waste and Transit

Located at: 2002 N. Orient Tampa, Florida

in compliance with National Fire Protection Association standards, and recommendations of equipment manufacturers.

II. It is agreed that the CONTRACTOR shall provide the following services during the period of this Service Contract: PLEASE READ AND KEEP ATTACHED EXHIBIT A

III. The CONTRACTOR shall inspect the equipment and installation time(s) during each contract year at approximate intervals of Two (2) month(s), with the initial inspection to be performed within Six (6) month(s) from the receipt of the executed contract. A report (in duplicate) of each inspection shall be forwarded to the officer specified by the OWNER. Reports to be sent to: Six (6)

Robert Bedore
(Name and Title)

IV. The term of this Contract shall be for a period of not less than One (1) Year nor more than Five (5) Years, beginning November 1, 1989 and ending October 31, 1990 unless sooner terminated by either party as provided herein.

V. Payment to be paid by the OWNER Net 30 days upon completion of services described in this agreement. A service charge of 1½% per month (18%) per year will be added to delinquent accounts. OWNER agrees to pay CONTRACTOR $ 500.00 per semi-annual inspection ($1,200.00 Annually) for services performed under the terms of this agreement.

CONTRACTOR:

BY: [signature]

TITLE: VICE PRESIDENT

DATE OF EXECUTION: 10-25-89

ATTEST:

SOUTHWEST DISTRICT TAMPA

OWNER:

BY: [signature]

TITLE: Branch Manager

DATE OF EXECUTION: 12/4/89

ATTEST: DEC - 7 1989

D.E.R.

SEE TERMS AND CONDITIONS ON REVERSE

1. It is hereby mutually agreed that work will be done during the seller's normal working time. If work is to be performed during other than the seller's normal working hours, the buyer agrees to pay the additional overtime expenses unless specifically stated otherwise in this proposal.

2. Each inspection shall normally include tests of circuitry for continuity and adequate insulation, and of components for proper functioning condition. If such tests are not possible due to plant operation, this shall be noted on the Inspection Report.

3. The CONTRACTOR shall replace equipment found defective due to improper design, or faulty manufacture within the terms of the installation purchase agreement. If the defectiveness is the result of conditions not disclosed to the CONTRACTOR at the time of system design, or improper handling by the OWNER, or a change in plant conditions, the charges incurred to bring the system up to the proper standard of protection shall be borne by the OWNER. The CONTRACTOR shall replace equipment, subject to normal deterioration such as batteries, explosive devices, etc., and the expense of such replacement shall be borne by the OWNER. If plant conditions exist which accelerate such deterioration, such conditions shall be noted in the Inspection Report.

4. The CONTRACTOR, in the event of actuation of the protection system, shall provide service personnel to inspect the installation and recommend the reconditioning and/or replacement of equipment necessary to return the protection system to its original state. Costs for reconditioning and/or replacement to be borne by the OWNER. The system shall not be placed in operation until final inspection by the CONTRACTOR'S service personnel has been performed. A report (in duplicate) shall be forwarded as stated in Paragraph III outlining the work performed.

5. OWNER agrees to indemnify and hold harmless CONTRACTOR against claims, actions or demands against him, and against any damages, liabilities, for personal injury or death, or for loss or damage to property arising out of OWNER'S use of these systems. It is further agreed that CONTRACTOR is not liable for repairs, alterations or installations made by OWNER.

6. The OWNER shall advise the CONTRACTOR of any changes made in the equipment, operating procedures, installation or plant, prior to the incorporation of such changes. This Contract shall not cover the charges for any work performed by the CONTRACTOR necessary to render the system satisfactory for the changed conditions.

7. It is understood and agreed between the parties hereto that the CONTRACTOR is not an insurer, that the payments hereinbefore named are based solely on the value of the service in the maintenance of the system described, and that the CONTRACTOR assumes no liability whatsoever for the failure of the equipment to perform the service for which it is intended or for any losses of whatever nature which may result from any malfunction or alleged malfunction of the system.

8. This Contract shall remain in force from the date of execution by CONTRACTOR and may be terminated by either party upon Thirty (30) Days written notice.

9. In the event the settlement of the controversy or claim arising out of or relating to this agreement as to breach thereof, cannot be concluded by the parties to this Service Contract, they shall resort to arbitration upon written request one to the other. Such arbitration shall be in accordance with commercial arbitration rules then in effect of the American Arbitration Association and both parties agree to abide by a decision resulting from such arbitration. If necessary, the decision of the American Arbitration Association may be enforced by the courts having jurisdiction over this contract.

10. In the event arbitration or legal action is brought by either party to this Contract, the prevailing party shall be entitled to costs and attorney's fee which will be made a part of the award of judgement.

11. The laws of the State of Florida shall apply and bind the parties in any and all questions arising hereunder, regardless of the jurisdiction in which any action or proceeding may be initiated or maintained. It is understood, however, that this is a general form of agreement and if any of its provisions are contrary to the laws of the State or Territory, such provisions shall be deemed not to be a part of this agreement, and the remainder of this agreement shall remain in full force and effect.

BORRELL
FIRE SYSTEMS
SINCE 1947

EXHIBIT A

SEMI-ANNUAL INSPECTION FOR HALON / CO2 / DRY CHEMICAL/ FIRE ALARM SYSTEMS

The following to be performed per the terms of the Agreement:

1. Agent Storage Containers

   Check the pressure gauges of each agent storage container. If the pressure is less than the manufacturer's specification, the container should be removed, inspected carefully and reconditioned, recharged or replaced as required.

   Check all component supporting hardware and tighten are required. Inspect all piping, fittings and nozzles for looseness, dirt or other damage. Disconnect piping at the agent storage container and blow out with low air pressure if needed.

   Determine weight of all agent storage containers. Losses in net weight of agent must not exceed 5%.

2. Detectors, Manual Pull Stations, Abort Switches, Signal Devices

   Check each individual device for proper response. If required, clean detectors of dust, oily film, etc., per the manufacturer's instructions.

3. Main Control Panel and System Components

   Check the following: Input voltage, reset switch, system trouble, lamp test switch, battery test switch, trouble silence switch, supervision of modules, relays, signal circuits, ground fault, short circuit faults, external output, smoke detector output, battery output, alarm outputs, dry contacts, ammeter, voltmeter, remote monitor, remote annunciator, underfloor annunciator.

4. Sequence of Events

   Confirm that the air handlers, exhaust fans, shunts, ETL dampers, motorized dampers, bells, magnetically held doors, horns, remote alarms, etc., performed per the plans and specifications.

BORRELL FIRE SYSTEMS
501 N. Newport Avenue
Tampa, Florida 33606-1325
(813) 254-3306 • FAX (813) 253-3190
FL WATS 1-800-282-6527

5. Initiator Replacement

Some systems will have initiators to discharge the agent. The initiators in each storage container must be replaced periodically. The life span will vary with the ambient temperature.

The following replacement schedule is recommended:

Maximum Exposure Temperature	Replace After
80°F	5 Years
100°F	3 Years
120°F	2 Years
140°F	1 Year

6. Battery Inspection and Replacement

Check batteries for physical damage. Batteries with cracked cases, loose or corroded terminals should be replaced. Check batteries electrically by placing a load across the battery to see if the battery comes up to voltage and whether it will discharge quickly. Batteries that quickly discharge should be replaced. The life span of batteries will vary with ambient temperature. The following replacement schedule is recommended:

Maximum Exposure Temperature	Replace After
80°F	5 Years
100°F	3 Years
120°F	2 Years
140°F	1 Year

BORRELL
FIRE SYSTEMS
SINCE 1847

October 23, 1989

Universal Waste and Transit
2002 N. Orient Road
Tampa, Florida 33619
Attention: Mr. Robert Bedore

RE: Service Contract Proposal
Halon Fire Suppression System

Dear Mr. Bedore:

Enclosed is our Service Contract to perform semi-annual maintenance inspection on the Halon Fire Suppression System installed at the above mentioned facility.

We are obligated by our insurance carrier to advise you that this periodic maintenance is required by the National Fire Protection Association and by the manufacturer's warranty and product guarantee.

Our experience has proven to us the value of such periodic maintenance. The cost of the maintenance is truly insignificant when compared to the cost of replacing the equipment and facility that these fire systems protect.

I sincerely hope that you will find our proposal acceptable and will return all signed copies back to our office. An executed copy will be returned for your files and an appointment will be scheduled for your maintenance inspection to begin.

Please feel free to call our office should you have any questions.

Yours truly,

BORRELL FIRE SYSTEMS

Shirley A. Jones
Administrative Secretary

SAJ:rms
Enclosures

BORRELL FIRE SYSTEMS
501 N. Newport Avenue
Tampa, Florida 33606-1325
(813) 254-3306 • FAX (813) 253-3190
FL WATS 1-800-282-6527

BORRELL FIRE SYSTEMS

BORRELL™

☐ **TAMPA BRANCH**
501 N. NEWPORT AVENUE
TAMPA, FLORIDA 33606
(813) 254-3306

☐ **ORLANDO BRANCH**
624 DOUGLAS AVENUE
SUITE 1404
ALTAMONTE SPRINGS, FLORIDA 32714
(407) 788-3335

☐ **POMPANO BEACH BRANCH**
1864 N.W. 21st STREET
POMPANO BEACH, FLORIDA 33069
(305) 974-9100

☐ **JACKSONVILLE BRANCH**
4110 SOUTHPOINT BOULEVARD
JACKSONVILLE, FLORIDA 32216
(904) 733-9477

Service Contract For Fire Protection Systems

I. This contract between Borrell Fire Systems, a Division of Borrell Electric Co., Inc., hereinafter designated as the CONTRACTOR, and Universal Waste and Transit hereinafter designated as the OWNER, covers the servicing and maintenance by the CONTRACTOR of the Fire Protection System(s) No.(s) installed in the:

Area or Department North and South Non-flammable Storage F/A, Flammable Storage Foam System

of

Name of Company Universal Waste and Transit

Located at 2002 N. Orient Tampa, Florida

in compliance with National Fire Protection Association standards, and recommendations of equipment manufacturers.

II. It is agreed that the CONTRACTOR shall provide the following services during the period of this Service Contract:

PLEASE READ AND KEEP ATTACHED EXHIBIT A

III. The CONTRACTOR shall inspect the equipment and installation Two (2) time(s) during each contract year at approximate intervals of Six (6) month(s), with the initial inspection to be performed within Six (6) month(s) from the receipt of the executed contract. A report (in duplicate) of each inspection shall be forwarded to the officer specified by the OWNER. Reports to be sent to:

Robert Bedore
(Name and Title)

IV. The term of this Contract shall be for a period of not less than One (1) Year nor more than Five (5) Years, beginning November 1, 1989 and ending October 31, 1990 unless sooner terminated by either party as provided herein.

V. Payment to be paid by the OWNER Net 30 days upon completion of services described in this agreement. A service charge of 1½% per month (18%) per year will be added to delinquent accounts. OWNER agrees to pay CONTRACTOR $ 600.00 per semi-annual inspection for services performed under the terms of this agreement. ($1,200.00 Annually)

CONTRACTOR: ATTEST:

BY: _____ _____

TITLE: VICE PRESIDENT _____

DATE OF EXECUTION: 10-25-89

OWNER: ATTEST:

BY: _____ _____

TITLE: _____ _____

DATE OF EXECUTION: _____

SEE TERMS AND CONDITIONS ON REVERSE

BORRELL
FIRE SYSTEMS
SINCE 1847

EXHIBIT A

SEMI-ANNUAL INSPECTION FOR HALON / CO2 / DRY CHEMICAL/ FIRE ALARM SYSTEMS

The following to be performed per the terms of the Agreement:

1. Agent Storage Containers

Check the pressure gauges of each agent storage container. If the pressure is less than the manufacturer's specification, the container should be removed, inspected carefully and reconditioned, recharged or replaced as required.

Check all component supporting hardware and tighten are required. Inspect all piping, fittings and nozzles for looseness, dirt or other damage. Disconnect piping at the agent storage container and blow out with low air pressure if needed.

Determine weight of all agent storage containers. Losses in net weight of agent must not exceed 5%.

2. Detectors, Manual Pull Stations, Abort Switches, Signal Devices

Check each individual device for proper response. If required, clean detectors of dust, oily film, etc., per the manufacturer's instructions.

3. Main Control Panel and System Components

Check the following: Input voltage, reset switch, system trouble, lamp test switch, battery test switch, trouble silence switch, supervision of modules, relays, signal circuits, ground fault, short circuit faults, external output, smoke detector output, battery output, alarm outputs, dry contacts, ammeter, voltmeter, remote monitor, remote annunciator, underfloor annunciator.

4. Sequence of Events

Confirm that the air handlers, exhaust fans, shunts, ETL dampers, motorized dampers, bells, magnetically held doors, horns, remote alarms, etc., performed per the plans and specifications.

BORRELL FIRE SYSTEMS
501 N. Newport Avenue
Tampa, Florida 33606-1325
(813) 254-3306 • FAX (813) 253-3190
FL WATS 1-800-282-6527

5. Initiator Replacement

Some systems will have initiators to discharge the agent. The initiators in each storage container must be replaced periodically. The life span will vary with the ambient temperature.

The following replacement schedule is recommended:

Maximum Exposure Temperature	Replace After
80°F	5 Years
100°F	3 Years
120°F	2 Years
140°F	1 Year

6. Battery Inspection and Replacement

Check batteries for physical damage. Batteries with cracked cases, loose or corroded terminals should be replaced. Check batteries electrically by placing a load across the battery to see if the battery comes up to voltage and whether it will discharge quickly. Batteries that quickly discharge should be replaced. The life span of batteries will vary with ambient temperature. The following replacement schedule is recommended:

Maximum Exposure Temperature	Replace After
80°F	5 Years
100°F	3 Years
120°F	2 Years
140°F	1 Year

(2). LOADING AND UNLOADING OPERATIONS

This facility has been designed for ease in material handling. As shown on the "as built" drawings both incoming and outgoing vehicles have separate loading and unloading areas. The south side of the building is used for incoming waste and the center and north sections for both incoming and outgoing waste. Container movement can easily be managed in this area.

Truck wells have been designed to accomodate both straight trucks and tractor trailers.

The rear of the truck is level with the floor of the building. This insures the ease of transfer of the waste materials either from the truck into the facility or from the facility into the outgoing vehicle. Container transfer can be accomodated either manually with drum trucks or by means of towmotors equipped with barrel handling attachments. Drums will never be moved with the forks of a lift truck.

Any drum movement within the flammable storage area will be accomplished manually. We firmly believe that manual drum movement within the flammable/combustible storage area is much safer than movement of drums with lift trucks even if those lift trucks are specifically equipped to operate in high hazard areas.

A similiar belief is held for internal drum movement within the facility. We believe it is easier and safer to move most of the drums manually with drum trucks rather than to attempt negotiating corners and turns with a motorized lift truck.

All containers will remain sealed during storage and will only be opened as required for inspection, transfer, consolidation or treatment.

Tractor trailers may be used as temporary storage units for drums prior to transport off-site. These vehicles will meet all requirements for transfer facilities as dictated by FDER.

As previously discussed all containers will have been inspected prior to the transport from the generators facility by a Universal Waste & Transit chemist to insure that they meet all DOT and DER criteria for structural integrity and compatibility. Included as Attachment 12 is a chemical compatibility chart for plastics, metals and elastomers which will be given to all Universal Waste & Transit chemists during their training program. This compatibility chart will give guidance to the field chemists during their inspection of the containers at the generators site and will allow them to pre-determine whether any problems may arise during transit or storage.

All transport vehicles are equipped with drum lids; gaskets; drum bungs; bands and bolts. These items can be replaced before transport if necessary. All vehicles are also equipped with overpack containers and spill cleanup materials should those be required.

As previously addressed the containers are again inspected upon receipt at the Universal Waste & Transit facility for structural integrity.

We, therefore, believe that we have taken every precaution to mitigate any hazards involved during loading or unloading operations.

(3.) PREVENTION OF PERSONNEL EXPOSURE

The prevention of employees to any exposure or unnecessary hazard is always of utmost importance. Adequate training is the first step in assuring that personnel exposure is minimized. The Universal Waste & Transit Training Program is included as Volume 4 of this submittal. In addition to this training program however, additional requirements may be necessary.

All field personnel at Universal Waste & Transit are supplied at least five (5) sets of work uniforms per week. They are required to change from their street clothes into their uniforms each day. Before handling any containers all employees are required to wear the following protective equipment:

- disposable tyvek suits
- safety glasses
- boots
- gloves (type of glove dependent upon activity undertaken)

No eating, drinking or smoking will be tolerated inside the active portion of the facility.

At the end of each work day all employees who have been working in the storage/treatment area are required to change from their work uniform into their street clothes. No uniforms are allowed to be taken home. Universal Waste & Transit. is resposible for cleaning all uniforms.

A wide variety of additional protective equipment will be available for tasks which require higher levels of protection. For example, all personnel handling acids or alkaline materials will wear acid resistant clothing and gloves as well as a face shield in place of safety glasses. Full body encapsulation suits; air-line respirators; full and half-face cartridge respirators as well as SCBA's are also available. A complete description of all safety equipment available and its use is included within the previously addressed training program (Volume 4).

(4.) PREVENTION OF WATER SUPPLY CONTAMINATION

There are no recorded potable water wells within one quarter (1/4) mile of the proposed facility. A printout from the SWFWMD indicating this is included as Attachment 5.

The area immediately surrounding the accessible active portions of the facility will be either concrete or asphalt.

All drummed wastes will be stored in compatible, DOT acceptable containers which have been inspected to insure their structural integrity and which are considered primary containment.

All floors are sloped to containment sumps. The slope of the floors is away from all doorways, therefore, the waste cannot flow outside of the building. The slope on the floor is 1/8 inch per foot. No drum is located further than 25 feet from a containment sump, as shown on Attachment 13.

All truck wells are sloped to a containment trench. This containment trench flows by means of a sump pump to both sand and activated carbon systems. The sump pump must be manually activated for any entrained liquid to leave the containment trench.

However, to further alleviate any fears, we have installed several monitoring wells both up gradient and down gradient from the facility. These wells are of the design as indicated on Attachment 15. All wells have been installed according to accepted.hydrogeological criteria. These wells, once developed, will be monitored on an annual basis as part of our routine procedures. The data obtained will be maintained at the facility and copies presented to the DER during their periodic inspection of the facility. If at any time during the monitoring program unusual or excessively high values are obtained, Universal Waste & Transit will immediately notify the DER of that data.

Also included in Attachment 15 is the soil boring data obtained at the site. Both soil and ground water samples were analyzed and this data is also included.

It should be noted that neither state nor federal law requires monitoring wells at this facility.

By employing the criteria previously addressed we believe that Universal Waste & Transit has insured that no surface or subsurface contamination will occur at this site.

SAND & ACTIVATED CARBON FILTRATION SYSTEM

The sand and activated carbon filtration system is a simple stormwater pretreatment system required by the City of Tampa.

It is not intended to treat spills of hazardous waste!!

During rain events the sump pump will be activated at the loading dock area and accumulated rainwater will be fed through the filtration system to the stormwater retention pond.

When loading or unloading of waste materials the sump pump is not to be activated until the loading or unloading process is completed. This ensures that an unlikely spill would not be transferred to the retention pond.

On a quarterly basis the sand filter will be inspected and, if required, the sand will be manually removed and new sand manually replaced. On a semi-annual basis the activated carbon canister will be removed from service; sent to the manufacturer for regeneration and a new carbon canister installed. This preventative maintenance activity will be recorded in the facility operating record.

Revised February, 1990

SPILL RESPONSE PROCEDURES

In the unlikely event that a spill were to occur at the UW&T facility during loading or unloading the following procedures would be implemented:

As previously indicated the containment trench sump pump is not activated during loading or unloading of waste.

Upon detection of liquid in the containment sump the leaking container will be located immediately and its contents either transferred to a new container or overpacked into a larger container.

All waste entering the facility has been previously analyzed and therefore the chemical composition is easily determined. Small volumes of liquid in the collection sump will be removed by means of a Patay pump and placed into a suitable container, larger volumes will be removed by an on site vacuum tanker. Waste then will be properly labeled and managed in accordance with all applicable state and federal regulations.

Any spilled material on the loading dock surface will be removed with absorbent pads or sorbent granules (oil-dri) and placed into an appropriate container for off site disposal.

Revised February, 1990

The sump and loading dock will be decontaminated with an appropriate decontamination solution which will also be removed from the sump or floor as previously described and managed as indicated above.

After final cleanup a decontamination assessment plan will be submitted to FDER for approval. This plan will increase surface/subsurface containment assessments: acceptable levels of decontamination and ultimate spill residue repository.

All response information and associated data will be entered into operating record.

EMERGENCY SHOWER & FIRE SYSTEM ACTIVATION

The emergency shower will be activated when personnel have come into intimate contact with waste materials which could endanger human health or safety. For example acids; caustics; flammables or chlorinated solvents.

The majority of the shower water would be contained within the containment area. Any overflow would run to one of the containment sumps.

After caring for the affected individual all liquids would be removed as previously described. Similar procedures would begin for decontamination; analyses; removal & disposal.

The activation of the foam and/or sprinkler system would indicate that a fire had occurred. The Contingency Plan would be implemented immediately and all necessary agencies contacted to inform them of the situation.

After the situation was controlled an assessment would begin which would determine several key parameters. Those would include the following:

The quantity and types of waste discharged; structural damaged; volume damage; volume of liquid which may have been discharged; an estimate of the volume of liquid still remaining within the building.

Upon completion of the assessment a cleanup plan would be submitted to FDER for approval.

(5.) RUN-OFF PREVENTION

As previously noted all container storage at this facility is under roof.

As shown on the " as built" drawings the facility floor is five inches of continuously poured 4000 psi concrete with 6x6, 10/10 wire mesh reinforcement throughout. The floors are coated with one coat of sealant and two coats of polyurethane coating. This coating is Glidthane 1. The specifications are included as Attachment 16.

As shown on the "as built" drawings the floor of the facility has been divided into containment areas. The storage area is divided into ~~four~~ three containment sections ~~each with its own~~ having a total of five containment sumps. Each collection sump has a 928 gallon capacity (3 ft. X 4.6 ft X 8 ft = 122 cubic feet X 7.5 gal/cu ft = 928 gallons). No seams exist on the collection sumps. The floor is sloped at a grade of 1/8 inch per foot on all four sides to the collection sump. A similar floor design and collection sump exists in the flammable/combustible storage area.

Revision 1 December, 1989

(5.) RUN-OFF PREVENTION

As previously noted, all container storage at this facility is under roof.

As shown on the "as built" drawings the facility floor is five (5) inches of continuously poured 4000 psi concrete with 6x6, 10/10 wire mesh reinforcement throughout. The floors are coated with one coat of sealant and two coats of a polyurethane coating. This coating is Glidthane 1. The specifications are included as Attachment 16.

As shown on the "as built" drawings the floor of the facility has been divided into containment areas. The storage area is divided into three containment bays having a total of five collection sumps. Each collection sump has a 810 gallon capacity (3 ft X 4.5 ft X 8 ft = 108 cubic feet X 7.5 gal/cu. ft. = 810 gallons).. These collection sumps are pre-cast concrete, coated with sealant. No seams exist on the collection sumps. The floor is sloped at a grade of 1/8 inch per foot on all four sides to the collection sump. A similiar floor design and collection sump exists in the flammable/combustible storage area.

replaced LRM

Since the maximum storage volume per bay will not exceed 9,280 gallons we are within the required 10% containment with the collection sumps alone.

As previously indicated the loading area is slopped towards the containment trench. The portion of this trench is controlled by a manually operated sump which discharges to a sand and activated carbon filtration system.

The ultimate portion of this discharge is the retention pond. Any liquids retained in the containment trench will be analyzed prior to discharge. The containment trench will be inspected twice daily and monitored continuously during rain events.

All hazardous waste at the facility will be managed as hazardous waste and will not, in any case, be discharged to the retention pond.

The interior sumps will be inspected daily. The liquids will be analyzed for the parameters indicated on the UW&T Request For Disposal Form.

Revision 1; December, 1989

The maximum storage volume can not exceed 33,600 gallons. The collection sumps alone can contain 4,050 gallons and therefore we are well within the 10% required containment.

As previously indicated the loading area is sloped towards the containment trench. The outfall of this trench is controlled by a manually operated sump pump which discharges to a sand and activated carbon filtration system. The ultimate outfall of this discharge is the retention pond. Any contaminated liquids retained in the containment trench will be analyzed prior to discharge. This analyses will determione whether the liquids can be pretreated with the sand and activated carbon system or will require removal and off-site disposal. Only contaminated liquids will be pretreated before discharge to the retention pond. Rainwater will not require pretreatment. The containment trench will be inspected daily.

The interior sumps will be inspected daily. These liquids will be analyzed for the parameters indicated on the UW&T Request For Disposal Form.

REPLACED LRM

(6.) PREVENTION OF ACCIDENTAL IGNITION OR REACTION

Universal Waste & Transit will take many precautions to insure that the accidental ignition or reaction of waste materials does not occur.

As previously indicated all flammable and combustible materials will be segregated in a specially designed area. Since there are three separate containment areas within the general storage portion of the facility it is very easy to segregate incompatible materials so that no inadvertant comingling of incompatible wastes will ever occur. All containerized wastes will be properly sealed, labeled and manifested by the generator. Upon receipt at the facility representative samples will be taken to verify the contents. Incompatible wastes will be strictly segregated in the container storage bays.

Any transfer of flammable liquids will occur by means of a manually operated Patay pump or by air operated diaphragm pumps. No electrical equipment will be used in the flammable storage area. As previously indicated all drum movement within the flammable storage area will be performed manually; no lift trucks will be used in the flammable/combustible storage area.

The flammable storage area is designed solely for the placement of ignitable wastes. It contains the following:

- Complete firewall seperation on all sides.
- Explosion proof wiring throughout the area.
- Automatic ventilation system.
- Continuous lower explosive limit (LEL) monitoring.
- Automatic activation of the ventilation system.
- Fully sprinklered.
- Secondary fire supression system (High Expansion Foam)
- Halon fire extinguishers.
- Explosion proof lighting.
- Non-sparking tools.
- Manual or air operated pumps only.
- Flame and smoke detectors.
- Explosion proof emergency lighting, fire alarm and intercom system.

"No smoking" signs have been placed throughout the building. The entire building is sprinklered and smoke detectors are located throughout. A continuously monitored fire alarm system has been installed.

The solidification system is an enclosed system with little or no chance of producing fumes, dusts or mists.

There will be no mixing of incompatible wastes at the facility. Waste compatibility will be determined by test methods taken from the "Test Methods For Evaluating Solid Waste: Physical/Chemical Methods"; SW-846; and other USEPA approved methodology.

Prior to any waste being placed into a treatment or storage unit it will be evaluated for its compatibility to the construction materials of that tank or treatment unit. Attachment 12 lists compatibility of construction materials for a variety of chemical compounds.

No material will be transferred into an empty container or treatment unit that previously contained an incompatible waste, unless the unit has been properly cleaned. Treatment systems will be cleaned by flushing with water or solvent or both. If necessary any solids or sludge will be removed manually employing all necessary precautions.

Precautions will be taken to avoid mixing of incompatible wastes through the use of common lines. All pumps, hoses and pipes will be properly flushed, drained and/or purged to preclude cross contamination with incompatible materials.

At the completion of a transfer operation, the pump, hoses and piping will be thoroughly flushed with water (or some compatible fluid). The pump will be shut off, and either air or inert gas (if flammable vapors were initially present) will be used to purge the lines. Lines will not be cleaned when the next batch of waste is compatible with the last batch. Flushing and purging will be performed only between batches of incompatible wastes.

All flammable containers are located at least fifty feet from the nearest property line.

Grounding provisions will be made to dissipate any accumulation of static charge. The principles of static grounding and the hazards associated with flammable and reactive materials will be thoroughly explained to all personnel as part of their training.

All decontamination fluids and rinsates will be collected, analyzed and managed in accordance with all applicable local, state and federal regulations.

Revision 1; December, 1989

All flammable containers are located at least fifty feet from the nearest property line.

Grounding provisions will be made to dissipate any accumulation of static charges. The principles of static grounding and the hazards associated with flammable and reactive materials will be thoroughly explained to all operating personnel as part of their training.

REPLACED LRM

D. PREPAREDNESS AND PREVENTION

(1.) DESIGN AND OPERATION OF THE FACILITY

Universal Waste & Transit has previously discussed many design criteria which will insure that no fire, explosion, or unplanned sudden or non-sudden release will occur. These design standards have included:

- Completely segregated flammable/combustible storage area with all of the safety features mentioned in the last section (Prevention of Accidental Ignition or Reaction).
- Seperate storage bins and collection sumps to insure that co-mingling of incompatible waste does not result.
- On-site emergency response and safety equipment.
- Use of only DOT approved containers which have been checked to insure their structural integrity has not been compromised.
- Use of only air operated pumps for liquid transfer

(2). **REQUIRED EQUIPMENT**

In order to insure the safe operation of this facility Universal Waste & Transit will supply the following equipment at the facility:

- an internal communications device which will consist of a telephone system equipped with an intercom. The intercom/telephone system is shown on the Safety Equipment Drawing (Attachment 17). Personnel will have easy access to this system regardless of their location.

- As a secondary alarm system Universal Waste & Transit will have available a number of air horns which can be manually activated in an emergency situation. These horns are located so that they are easily visible. Once again these warning horns are identified on Attachments 17.

- A complete set of emergency telephone numbers will be posted above every telephone/intercom system.

- Portable, multipurpose (ABC) fire extinguishers will be located throughout the facility and clearly identified with labels reading "Fire Extinguishers" . Halon fire extinguishers are located in the flammable storage area similarly marked. All of these are identified on Attachments 17.

- The entire facility will be equipped with smoke detectors and a sprinkler system. Automatic and continuous monitoring will be performed on a 24 hour basis. A secondary fire suppression system will be located in the flammable/combustible storage area. This is a high expansion foam system. Flame detectors and an automatic lower explosion limit monitoring system are also located in the flammable/combustible storage area. The sprinkler system will be directly attached via a riser to a 6 inch water line. A wide variety of spill control and safety equipment will be available to personnel at the facility. A complete list of this equipment is include within the Contingency Plan.
- It will be company policy that at least two employees be present before entering any active portion of the facility. Seperate storage areas for general storage; flammable storage; bulk storage and waste processing.

(3.) TESTING AND MAINTENANCE OF EQUIPMENT

All equipment at UW&T will be tested and maintained in accordance with manufacturers recommendations. Since all equipment such as alarm systems; fire protection equipment; treatment systems and safety equipment are new, UW&T has enetered into maintenance agreements with the manufacturers.

Inspection of equipment will occur at least every six months from the date of purchase or at a frequency recommended by the manufacture.

A detailed Inspection Plan is attached to this submittal.

(4.) ACCESS TO COMMUNICATIONS OR ALARM SYSTEM

As previously indicated and as shown on Attachment 17, a telephone/intercom system is located at various points at the facility. All employees should have easy access to this equipment regardless of their location.

Also as previously mentioned and as shown on Attachment 17, there are located throughout the facility numerous warning horns which can be easily activated and which will give a warning that an incident has occurred.

As previously stated it is company policy that at least two employees will be present before entering any active portion of the facility.

The evacuation routes are indicated within the Contingency Plan.

(5.) REQUIRED AISLE SPACE

The design of the Universal Waste & Transit storage and treatment facility will lend itself easily to the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment throughout the facility.

It should be noted that in all storage areas a minimum of approximately three feet has been allowed between rows of containers.

The aisle boundaries are marked with appropriately colored lines to clearly delineate the required aisle space.

No drums will be stored within four (4) feet of any wall at the facility. This allows for sufficient access to all safety and emergency equipment. Drums may be stored over the collection sumps but can easily be removed for inspection or liquid removal. Sufficient space will be available between the drums to inspect the bottom of the sump and for removal of any liquids which may be required. The sump design is shown on the "as built" drawings.

As previously indicated the on-site trailers may be used for temporary storage under the FDER transfer facilty regulations. These vehicles will be parked over impermeable surfaces and will contain all necessary spill response equipment. Sufficient space will be allowed for container inspection.

(6.) ARRANGEMENTS WITH LOCAL AUTHORITIES

The Universal Waste Contingency Plan has been submitted to all required agencies for review and comment. Copies of letters of receipt from those agencies are attached to the Contingency Plan in this submittal.

Prior to operation the local fire, police and emergency response groups will be invited to tour the facility to become familiar with the location of all items previously discussed. All such agencies are welcome to inspect the facility at any time.

E. PERSONNEL TRAINING PROGRAM

All personnel involved in any handling, transportation, storage or treatment of hazardous waste at Universal Waste & Transit are required to successfully complete the Universal Waste & Transit Personnel Training Program within 30 days of passage of their pre-employment screening physical examination. This training program includes the following:

1. Safety equipment
2. Personnel protective equipment
3. First aid and CPR
4. Waste handling procedures
5. Release prevention and response
6. Decontamination procedures
7. Facility operations
8. Facility maintenance
9. Transportation requirements
10. Recordkeeping

The Universal Waste & Transit personnel training program is included as Volume 4 of this document.

We strongly urge that all personnel involved in the handling, transportation, storage or treatment of hazardous wastes actively pursue additional technical courses at either the University of South Florida, or the St. Petersburg Junior College.

Recommended courses would include General Chemistry; Analytical Chemistry; Environmental Chemistry; Toxicology; Computer Technology; and additional Safety and Health related topics. Universal Waste & Transit will pay all registration, tuition and book fees for any courses which are job related. The only requirement is the successful completion of that course.

All training and related items will be handled by the Universal Waste & Transit training officer, Mr. Paul Sgriccia, P.E.. Mr. Sgriccia's resume' is included as Attachment 18 to this document and is also included within the Personnel Training Program.

All potential employees at Universal Waste & Transit are carefully screened prior to hiring. This includes:

in-depth interviews

academic and experience requirements

medical evaluation

All potential employees are informed that they will working with hazardous or potentially hazardous materials. All potential employees will visit the facility to determine first hand what the work environment entails. All potential employees are informed that any safety violations or improper handling of waste materials/containers will result in immediate dismissal.

A list of job related prerequisites, job titles and written job description are included as Attachment 19 as well as being included within the training program itself.

Four types of training are employed at Universal Waste & Transit. These include:

1. A formal training course for all new employees which encompasses the areas previously mentioned. This course is culminated by a written examination. A review of all formalized courses is performed annually. Written confirmation that the training program has been completed will be signed by each employee and verified by the training instructor.
2. An informal weekly safety meeting during which time new safety apparatus are discussed or training films/slide presentations are viewed. Alternative to this are discussions on waste handling procedures; site cleanup work; emergency response efforts; changes in regulations; etc.
3. Attendance at commercially available safety or preparedness classes. Examples include: J.T. Bakers "Management and Disposal of Hazardous Chemical Waste" or the various University of Florida TREEO Waste Management Courses. All supervisory personnel must attend these schools or similiar classes.
4. An ongoing on-the-job training program which assists new employees in familiarizing themselves with the existing working conditions and company policy. Also available to all employees is a well equipped technical library.

If an employee is not kept well informed of the company's activities they quickly loses interest and pride in his/her work. In the area of hazardous waste management this situation cannot be tolerated. Therefore, it is also company policy at Universal Waste & Transit to have a weekly meeting to discuss what work is in progress; what new jobs are anticipated and to determine what questions or recommendations employees may have to operate more efficiently or safely.
Contained within the Universal Waste & Transit training program are various documents which are given to all new employees. These include the following:

General safety manual

Protective clothing guide

Respiratory training program

Basic emergency training guide

Facility contingency plan

Pocket guide to Hazardous Waste Materials

NIOSH workers safety bulletin for hazardous waste sites

Each document is reviewed with the employee by Universal Waste & Transit safety officers.

All pertinent safety equipment is reviewed with all employees. This includes: Respirator; SCBA; Acid Suits; Encapsulation Suits; Fire Extinguishers ; Evacuation Horns and Routes; as well as material handling equipment.

Each employee is assigned their own respirator and fit tested as required. Cleaning and maintenance of the respirator is explained. The location and usage of safety and emergency response equipment is detailed.

All new employees are immediately informed as to the procedures involved in any spill or release at the facility. This includes:

- employee warning signals
- agencies to contact
- evacuation routes
- response actions

Finally, each new employee is shown how drums are inspected; opened; sampled; sealed; labeled; moved; and the recordkeeping and reporting requirements.

Upon completion of training program both an oral and written examination is required. An annual review of all training programs is performed.

All training records on current personnel will be kept until closure of the facility. Training records on former employees will be kept for at least three years from the date the employee last worked at the facility.

As previosly indicated the Universal Waste & Transit personnel training program is included as Volume 4 of this application.

5. CHEMICAL AND PHYSICAL ANALYSES OF HAZARDOUS WASTE HANDLED AT THE FACILITY

In order to comply with 40CFR Part 264.13 it will be necessary to obtain detailed analytical data on any waste material destined for the proposed facility prior to its receipt at the facility.
This information can be obtained from several sources. Those would include Material Safety Data Sheets; data obtained from waste profile sheets; or analytical data obtained from a certified laboratory. A detailed description of the procedures involved in obtaining this information is included within the Universal Waste & Transit Waste Analysis Plan included as Volume 3 of this application. A brief description of each is outlined below.

In certain instances the data obtained from a Material Safety Data Sheet may be sufficient to allow approval of a waste material into the facility. For example waste solvents such as ethanol, methanol, trichloroethane and so on may be sufficiently pure that the information contained on their Material Safety Data Sheets would yield sufficient analytical data. A list of the Material Safety Data Sheets which will be available at the proposed facility are included as Table 5 of the Universal Waste & Transit Waste Analysis Plan.

In all cases a Universal Waste & Transit Request For Disposal form must be filed with the facility manager or his/her designated representative prior to shipment of the waste to the facility. Included in the Waste Analysis Plan are typical Universal Waste & Transit Request For Disposal forms. Sufficient information is normally generated from this form to enable Universal Waste & Transit personnel the ability to adequately determine the wastes acceptability prior to its receipt at the facility.

A third alternative for the generator of the hazardous waste would be to obtain representative samples of those materials, employing acceptable sampling criteria, and subsequently submitting those samples to a certified analytical laboratory for a complete chemical analyses. The analytical data required would be that needed to complete the Universal Waste & Transit Request For Disposal.

In all cases a sample of the waste material must be submitted to Universal Waste & Transit along with the Request For Disposal so that an informed decision can be reached on the wastes acceptability at the facility.

It should be noted that the responsibility for adequately identifying the characteristics of the waste rests with the generator of that waste.

The listing of hazardous wastes which would be considered acceptable at the facility have been previously identified on Attachment 10.

6. WASTE ANALYSIS PLAN

As previously indicated the Universal Waste & Transit Waste Analysis Plan is included as Volume 3 of this application. A brief description of that plan will be outlined below.

The intent of the Universal Waste & Transit Waste Analysis Plan is to adequately identify waste materials prior to their receipt at the facility. The responsibility for generating sufficient information for that decision to be reached rests with the generator of the waste. A sample of the waste as well as one of the following must be submitted by the generator prior to receipt of the waste at the facility. Those three options include:

Material Safety Data Sheet
Universal Waste & Transit Request For Disposal form
analytical data from a certified laboratory

Once the sample of the waste is delivered to the facility along with the required analytical information the Universal Waste & Transit facility manager or his/her designated representative will evaluate the sample and the data obtained. This review will determine whether the waste is acceptable for receipt at the facility. The review will answer the following questions:

-Is the facility permitted to handle the waste in question

-Is sufficient storage space available at the facility

-Can the waste be treated on site

-If on site treatment is not feasible is a suitable outlet available for the waste

-Do the physical characteristics (color, consistency, phases) match those identified on the waste profile sheet

Universal Waste & Transit will subcontract the majority of any required, in-depth analytical determinations, to a certified laboratory. At this time we are proposing to use either Wadsworth Laboratory; Pace Laboratory or ENCON Inc. A copy of those State approved Quality Assurance Plans are appended to the Universal Waste & Transit Waste Analysis Plan.

Universal Waste & Transit will have available on site the following analytical equipment for use in quality control analyses. This equipment includes:

pH/specific ion/orp meter

flash point tester (Pensky-Martins closed cup)

drying oven

associated laboratory glassware

This apparatus will allow Universal Waste & Transit the ability to perform quality control checks on incoming waste materials.

The following information will be addressed in detail within the Universal Waste & Transit Waste Analysis Plan:

parameters for which hazardous waste will be analyzed

waste analysis rational

test methods employed

sampling methods

frequency of analyses

generator supplied analytical data

quality control samples

We believe that the data supplied within the Universal Waste & Transit Waste Analysis Plan is sufficient to comply with all requirements of 40CFR Part 264.13.

UNIVERSAL WASTE AND TRANSIT
PROCEDURE FOR HANDLING UNKNOWN WASTE

In the event that the constituents of a waste material have not or cannot be determined prior to being transported to the UW&T facility, the waste will temporarily be classified as an "unknown waste".

Every attempt will be made to gather information about the unknown waste. If the generator of the waste is known he/she will be questioned as to the contents and any relevant information which may help in identifying the waste. This information together with on site analytical parameters may be sufficient to identify the material. If identification is determined by UW&T the waste will then be handled in accordance with UW&T established procedures for known waste. If identification is not possible at the site and transportation of the waste to UW&T is necessary, the following procedure will be implemented.

Step 1

Where applicable, prior to the unknown waste being loaded onto an EPA lincened truck for transportation to Universal Waste & Transit certain on site parameters will be run. Universal Waste and Transit personnel will analyzed the waste for color, density, physical state, pH, and any noticeable odor will be documented at this time. See attached Unknown Waste Characterization Form.

The data obtained from these physical parameters will determine whether the waste will be transported as a Hazardous Waste Liquid, or as a Hazardous Waste Solid. Once this determination is made the waste will be labeled as an unknown hazardous waste and transported to Universal Waste and Transit.

Step 2

Upon arrival at the facility the unknown waste will be segregated from the known waste by placing it in the North Bay, lab packing area. Ignitability, corrosivity and reactivity will be run as part of the UW&T in house quality control. One hundred percent (100%) of all unknowns entering UW&T will have these QC analyses performed within an appropriate time frame.. A less than 24 hour time frame is perceived for completion of the QC analyses.

Step 3

Upon completion of the QC analyses the waste will be classified as Flammable, Reactive, Acidic or Alkaline and moved to the corresponding bay within the facility. If the waste does not fall into any of the above mentioned of the above mentioned categories, further analytical parameters for identification will be determined on a case by case basis. Samples of the unknown waste along with the required chain of custody form (see attached) will be sent to a certified laboratory for analysis.
All analytical information will be kept on a UW&T Unknown Waste Characterization Form, a copy which is attached.

Upon receipt of the outside analytical the waste will be classified and shipped off site for final disposal at a Universal Waste & Transit approved waste disposal site.

UNIVERSAL WASTE & TRANSIT
UNKNOWN WASTE
CHARACTERIZATION FORM

Field Parameters

Color _____

Density _____

pH _____

Physical State _____

Odor _____

QC Parameters

Ignitability _____

Corrosivity _____

Reactivity _____

Follow-up Analytical

Parameter	Result

UW&T

UNIVERSAL WASTE & TRANS[illegible], INC.

2002 N. ORIENT ROAD, TAMPA, FLORIDA 33619
(813) 623-5302

CHAIN OF CUSTODY RECORD

Page _____ _____

PROJECT NO. PROJECT NAME

SAMPLER'S (SIGNATURE)

STATION NO.	DATE	TIME	COMPOSITE	GRAB	STATION LOCATION	NO. OF CONTAINERS									REMARKS

RELINQUISHED BY:	DATE/TIME:	RECEIVED BY:	RELINQUISHED BY:	DATE/TIME:	RECEIVED BY:
RELINQUISHED BY:	DATE/TIME:	RECEIVED BY:	RELINQUISHED BY:	DATE/TIME:	REMARKS:
RELINQUISHED BY:	DATE/TIME:	RECEIVED BY:	RECEIVED FOR LABORATORY BY:		

7. MANIFESTING, RECORDKEEPING AND REPORTING

A. Manifest System

All hazardous waste either entering or leaving the facility will accompanied by a Uniform Hazard Waste Manifest which will be acceptable to the State of Florida. This document is included within the Training Program as Exhibit 1 of Chapter VI. Waste material which is shipped out of state may require a different manifest since some states have specific manifest requirements. For example waste which is shipped to Chemical Waste Management in Alabama will require an Alabama manifest for that shipment. In those cases that specific manifest will be employed.

Any hazardous waste which is scheduled to be received at the Universal Waste & Transit facility via licensed hazardous waste transporter other than Universal Waste & Transit must have a manifest accompanying that shipment. The manifest must contain, at a minimum, the same information as required on a Uniform Hazardous Waste Manifest.

All required certifications (under the new Land Ban Restrictions) will also accompany any incoming/outgoing shipments. The UW&T Land Ban Certifications are attached to the manifest and shown as Chapter 7 within the Training Program (Volume 4 of this application).

When a manifested shipment arrives at the facility, the facility manager or his/her designated representative will perform the following:

1. sign and date each copy of the manifest to certify that the hazardous waste described on the manifest was received.
2. note any significant discrepancies on each copy of the manifest. (These would be obvious discrepancies such as the wrong number or type of containers.)
3. Check all containers to insure that they conform to both DOT and Florida DER compatibility and structural requirements.
4. A Universal Waste & Transit chemist will be notified that waste has arrived and that quality control samples must be obtained in accordance with the Universal Waste & Transit Waste Analysis Plan.
5. If all initial evaluations are consistent with the manifest; one copy of the manifest will be given to the transporter. If manifest discrepancies are noted or if the containers do not meet DOT or DER requirements the following will be immediately contacted in an attempt to resolve the discrepancy:
    1. generator
    2. transporter
    3. DER Regional Office (Tampa)

(For additional information on manifest discrepancies please note the "Manifest Discrepancy" portion of this section.)

6. Within thirty (30) days of the date the manifest was signed the original copy of the manifest will be returned to the generator.
7. All manifests will be retained at the facility for at least three (3) years from the date of delivery. A copy will also be retained at the corporate offices.
8. It is not anticipated that any waste will be received by either rail or water shipment directly to the facility.
9. Any waste material which is generated at the facility will comply with all regulations contained in 40CFR Part262 as well as the applicable sections in the Florida Administrative Code.

B. Manifest Discrepancies

When any manifest discrepancy is discovered it is necessary to immediately contact the generator and/or transporter in an attempt to resolve this discrepancy. If the discrepancy is not resolved within fifteen (15) days after receipt of the waste, Universal Waste & Transit, will notify the Florida DER in writing as to the extent of the discrepancy and what attempts were made to resolve the issue. A copy of the manifest will also be included.

A discrepancy will be defined as follows:

- A variation of more than 10% in weight for bulk wastes
- Any variation in piece count for containers
- Improper labeling or identification
- Irreconcilable differences between the initial and the on site waste analyses

2. OPERATING RECORD

A written operating record will be maintained at Universal Waste & Transit until closure of the facility. This operating record will contain at a minimum the following information:

1. A description, by its common name, of each waste which enters the facility.

2. The EPA/DER hazardous waste number for each of these wastes. If more than one EPA/DER number applies each will be listed.

3. The quantity of each waste.

4. The physical form of each waste (solid, liquid, semisolid, or contained gas).

5. If the waste is not a "listed waste" the description will also include the process by which the waste was generated.

6. The manifest reported weight or volume/density.

7. The methods by which the material was stored, treated or transferred off-site for disposal.

8. The dates on which this storage, treatment or transfer occurred.

9. All records and results of waste analyses.

10. Reports and details of any incident which required implementation of the Universal Waste & Transit Contingency Plan.

11. Records and results of all inspections (kept for three years only).

12. Location of each hazardous waste within the facility

13. All required notices to generators.

14. All closure cost estimates.

15. A certification statement, updated annually, that a program is in place to reduce the volume and toxicity of any hazardous waste generated.

A fully computerized data management program has been developed for Universal Waste & Transit to aid in maintaining all required Operating Record information. A printout of all data elements is included as Attachment 20.

3. **Availability, Retention & Disposition Of Records**

All records and plans which are required for the operation of this facility will be furnished or made available to the Florida DER or the USEPA upon request.

4. Documents Maintained At The Facility

The following documents will be maintained at the facility until closure and certification by a registered professional engineer:

- Waste Analysis Plan
- Personnel training documents and records
- Contingency Plan
- Inspection Plan
- Operating Record
- Universal Waste & Transit manifest copies with certifications
- Annual certification of waste minimization
- Closure Plan
- Closure cost estimate

5. Annual Reporting

Universal Waste & Transit will submit to Florida DER an annual report no later then March 1st of each year the facility is in operation.

6. Unmanifested Waste Reports

Universal Waste & Transit never anticipates unmanifested waste entering the facility, however, in the unlikely event that Universal Waste & Transit would accept waste materials into the facility without an accompanying manifest we would file an "Unmanifested Waste Report" with Florida DER.

This report would be filed within fifteen (15) days of the date the waste was received. The report would identify the following:

- Facility EPA identification number and address.
- Date the facility received the waste
- Generator EPA identification number & address
- A description of the waste and the quantity involved.
- The method of storage, treatment or transfer.
- An explanation of why the waste was not manifested.
- An explanation of why the waste was accepted without an accompanying manifest.
- A certification signed by the operator of the Universal Waste & Transit facility.

7. Additional Reports Required

Universal Waste & Transit will file a report with Florida DER and the USEPA in the event that any of the items listed below would occur:

- Releases, fires or explosions [in accordance with 40 CFR Part 264.56(j)].

- Closure (in accordance with 40 CFR Part 264.115).

B. CONTAINERS

1. Basic Design Parameters

As previously discussed the design of the container storage area at UW&T is unique. The floor of the facility is five (5) inches of 4,000 psi continuously poured concrete with 6x6, 10/10 wire mesh woven throughout. No cracks or gaps exist in the floor. This floor has been coated with one coat of sealant and two coats of epoxy urethane. The epoxy urethane coating is specified in Attachment 16. This floor with its subsequent coatings will be impervious to the material stored at the UW&T facility.

As shown on the "as built" drawings the floor of the UW&T facility is divided into containment bays. There are three such containment bays within the general storage area and one within the general storage area/ facility (two for the general storage area and one for the flammable storage area). A total of five containment sumps are located within these three bays. These bays are sloped at an angle of 1/8 inch per foot of floor area to the central containment sumps. This will ensure that any liquids resulting from leaks or spills would be directed to a central containment area.

No drum will be more than 25 feet from the containment sump.

Since the UW&T container storage and treatment facility is located completely under roof there is no potential for accumulation of precipitation on the active portion of the site.

Revision 1; December, 1989

B..CONTAINERS

1. Basic Design Parameters

As previously discussed the design of the container storage area at Universal Waste & Transit is unique. The floor of the facility is five (5) inches of 4,000 psi continuously poured concrete with 6x6, 10/10 wire mesh woven throughout.

This floor has been coated with 1 coat of sealant and 2 coats of epoxy urethane. This epoxy urethane coating is specified in Attachment 16. This floor with its subsequent coatings will be impervious to the material stored at the Universal Waste & Transit facility.

(As shown on the "as built" drawings the floor of the Universal Waste & Transit facility is divided into containment bays. There are three such containment bays within the general storage area and one within the flammable storage area. These bays are sloped at an angle of 1/8 inch per foot of floor area to a central containment sump. This will insure that any liquids resulting from leaks or spills would be directed to a central containment area.)

No drum will be more than 25 feet from the containment sump.

Since the Universal Waste & Transit container storage and treatment facility is located completely under roof there is no potential for accumulation of precipitation on the active portion of the site.

REPLACED 2RM

As previously discussed within the "General" section of this application the Universal Waste & Transit facility has the capacity for more than the required 10% containment of the maximum quantity of hazardous waste which may be potentially on site at any time. Our maximum storage capacity would be 33,600 gallons. If the facility were at maximum capacity and all waste present was liquid (a very unlikely situation), we would be required to contain 3,360 gallons of hazardous waste within the facility. Each containment sump has a capacity of 810 gallons. (See tab 15 page 41 should be 928) → Since there are five separate containment sumps this is a total containment volume within the sumps alone of 4,050 gallons. Therefore, the containment sumps alone place us above the required 10% maximum capacity as required by Federal and State law.

As shown on the "as built" drawings the interior floor of the building is ,at a minimum, 6 inches above the exterior ground elevation. It should also be noted that all exterior drainage is away from the proposed facility. These two items will insure that run-on to the facility is prevented.

In the unlikely event that a large volume of water were to enter the proposed facility, such as could result from the activation of the sprinkler system, Universal Waste & Transit will have on site both sand and activated carbon filtration units. This water can be analyzed and pretreated with those units if necessary. Also, our alternate Emergency Response Contractor, HazTech, has available a portable water treatment system which can be employed if necessary.

Any liquids which enter the containment sumps will be sampled and analyzed in accordance with the UW&T Waste Analysis Plan (Volume 3). This liquid, when removed, would be analyzed to determine its hazardous characteristics. Removal of the liquids would be performed by either a manual Patay pump or by air powered diaphragm pumps. Upon removal of this liquid it will be placed into the appropriate containers and managed as a hazardous waste if required.

As indicated within the UW&T Inspection Plan (Attachment 14) daily inspection of the sumps will be performed so as to prevent overflow of the collection system.

The truck well containment trench use; the means of discharge of any collected waters in the trench; the use of the sand and activated carbon filters and the required chemical analyses of any collected liquids is addressed in the General section of this volume.

All hazardous waste will be managed as hazardous waste and will not be discharged to the retention pond.

Revision 1; December, 1989

Container storage is as indicated on Figure 5.12-A. Containers in the ignitables bay (Bay 2) may be stored along the north and south interior walls (as indicated on Figure 5.12-A) as long as a minimum of two feet of aisle space is maintained and the containers do not block any exits, entrances, or safety equipment.

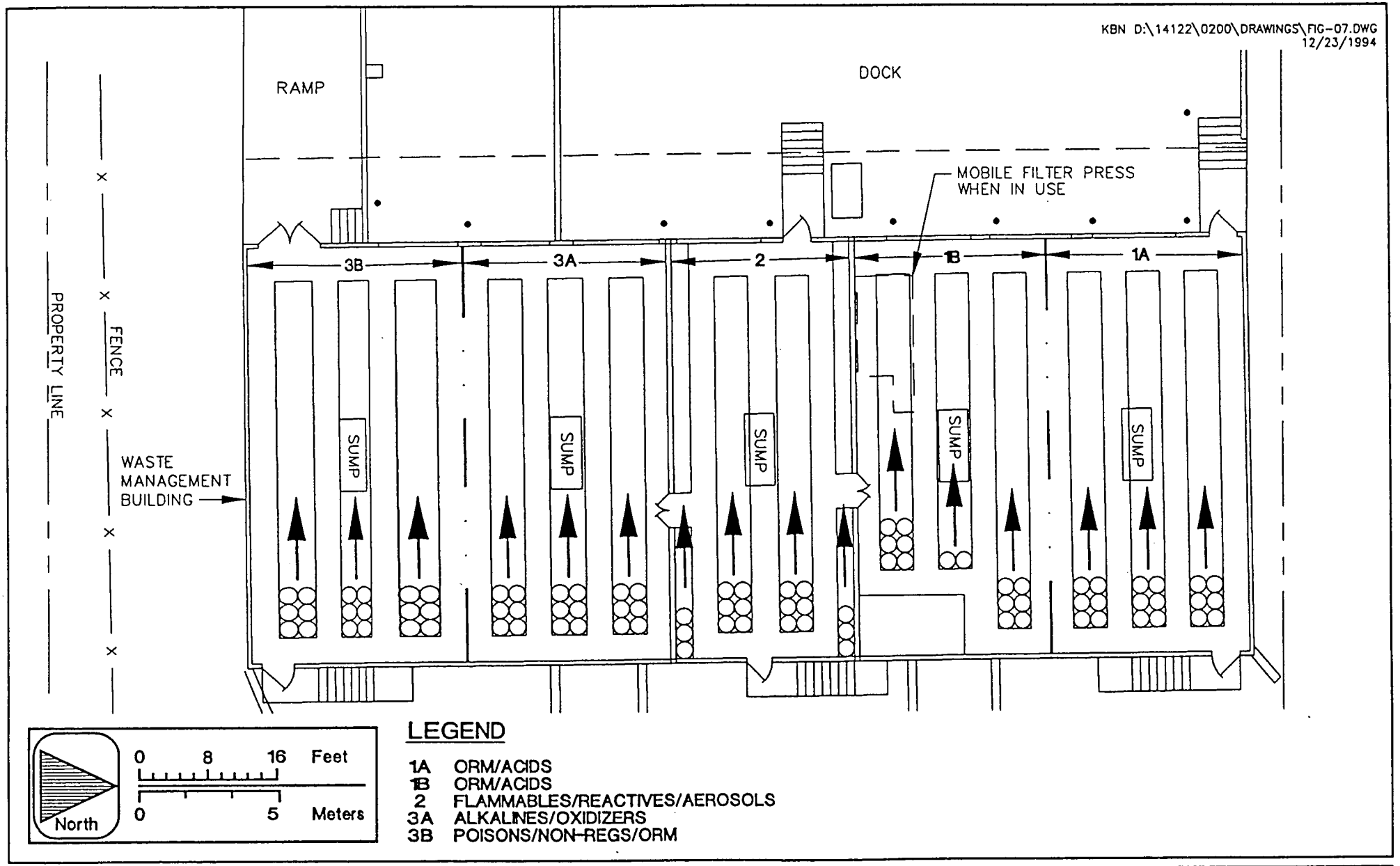


FIGURE 5.12 A
CONTAINER STORAGE DIAGRAM

Universal Waste & Transit, Inc.

SOURCES: UWT,1994; KBN,1994

2. Requirements for Ignitable, Reactive and Incompatible Waste

No ignitable or reactive waste will be stored within 15 meters (50 feet) of the property line.

All ignitable waste will be stored in a separate area specifically designed for the storage of such materials. These design criteria include:

- firewall separation on all sides
- fully sprinklered area with secondary fire supression system
- halon fire extinguishers
- automatic ventilation system
- automatic explosivity monitoring
- continuous monitoring of the alarm system
- use of non-sparking tools only
- no smoking throughout the area

A sign will be posted in the flammable area which states the following: "ONLY INTRINSICALLY SAFE LIFT TRUCKS PERMITTED IN THIS AREA".

No incompatible wastes, or incompatible wastes and materials will be placed into the same container. Included within the Universal Waste & Transit Training Program (Volume 4) are tables which indicate the following:

- chemical compatibility
- hazardous waste compatibility chart
- compatibility tree

These documents, when used in conjuction with the Training Program, will aid all employees in determining chemical compatibility to insure compliance with this section.

All containers will be compatible with their contents. All containers held at the proposed facility will be made of or lined with materials which will not react with the waste contained within. All compatibility testing will be performed as specified within "USEPA Methods for Determining Compatibility of Hazardous Waste" (EPA-600/2-80-76).

No hazardous waste will be transfered to unwashed containers which previously held waste material or raw material.

The co-mingling of potentially incompatible wastes at Universal Waste & Transit will not occur.

As previously discussed, all wastes will be analyzed prior to their receipt at the facility. Therefore, sufficient information will be available to determine if any wastes are potentially incompatible.

The following wastes will not be stored within the same containment area:

- no acidic wastes (D 002; with a pH of less than 2.0)) will be stored with any alkaline wastes (D 002; with a pH of greater than 12.5)
- no acidic wastes (D 002) will be stored with any cyanide or sulfide bearing wastes (D 003)
- no acutely toxic wastes (P coded wastes) will be stored with any acidic wastes (D 002) since several of these acutely toxic wastes have the potential for gaseous release under acidic conditions

4. Condition of Containers

Any hazardous waste container which is scheduled to be brought in to the proposed facility will be inspected before removal from the generators site to insure compliance with DOT regulations.

All containers will be in good condition with no evidence of rust; leaks; corrosion; or structural defects. Any container which does not meet these requirements will have the contents transferred to an acceptable container, will be overpacked into a compatible container, or will be left at the generator's site. If any container begins to leak similiar action will be taken immediately.

All containers held at the Universal Waste & Transit facility will remain sealed during storage. These container will opened only when it is necessary to add or remove waste materials, such as at the time of treatment, transfer, or during sampling. All containers will be managed and handled to insure that no damage, puncture, rupture or leakage will result. All containers will be transported either manually using drum trucks or by means of a towmotor equipped with a barrel handling attachment. No towmotors will be permitted within the flammable storage area. No drums will be moved with the forks of a towmotor vehicle.

Chemical compatibility of wastes with containers will be as prescribed by the Department of Transportation in 49CFR Parts 100 thru 199. All employees will be familiar with those standards. These standards will be briefly identified in this text.

No drum will be completely filled. Sufficient outage will be allowed so that the drum will not be full at a temperature of 130 degrees Fahrenheit. (2-3 inches of headspace will be available in all drums)

Flammable and combustible liquids will be acceptable in only DOT specification containers 5; 5A; 5B; 5C; 5M; 17E; 17C; 42B; 17H; 37A; 37P; 34; or 6D with inside liner of specification 2S.

Flammable solids; oxidizers and organic peroxides will be acceptable in only DOT specification containers 6B; 6C; 17C; 17E; 17H; 37A; 37B; 35; and 6D or 37M with inside liner of specification 2S, 2SL or 2U.

Corrosive liquids will be acceptable in only DOT specification containers 5A; 5B; 5C; 5M; 17C; 17E; 17F; 17H; 37A; 37B; 37P; 34; and 6D or 37M with inside liner of specification 2S, 2SL or 2U.

Corrosive solids will be acceptable in only DOT specification metal drums; fiber drums not exceeding 500 pounds and plastic drums or pails not exceeding 95 pound capacity.

Poisons will be acceptable in only DOT specification containers 5A; 5B; 5C; 17C; 17E; 37A; 37B; 34; 42B; 42D; and 6D or 37M with inside liner specification of 2S or 2SL.

Any material classified as "ORM" or Other Regulated Material must comply with the requirements of 49 CFR Part 172 Subparts B, C & D as well as Part 173 Subparts A & B.

In order for personnel to identify these containers their specifications are listed in 49 CFR Part 178 Subpart A Section 178.16; 49 CFR Part 178 Subpart B Sections 178.24, 178.35 and 178.35a as well as in 49 CFR Part 178 Subpart D Sections 178.80 thru 178.147.

For ease of identification the DOT specification number is stamped on the drum itself.

A list of chemical compatibilities is included as Attachment 12.

5. Inspection Procedures

All containers in the container storage area will be inspected on a daily basis in compliance with Universal Waste & Transit Inspection Plan (Attachment 14).

Any defects in containers noted during inspection will be corrected immediately. Any defects in the containment systems such as cracks, or other structural damage which may be noted during an inspection will be corrected within fourteen (14) days or Universal Waste & Transit. will submit within seven (7) days a schedule to correct these defects to the Florida DER. In the event that hazard is imminent, remedial action will be taken immediately.

6. Closure

The Universal Waste & Transit Closure Plan is included in Volume 1 of this document. At the time of closure all hazardous waste and residues will be removed from the containment system. Any remaining containers or contaminant items will either be removed for off-site disposal or decontaminated in compliance with the previously referenced Closure Plan.

J. CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT

1. General Operating Requirements

Universal Waste & Transit proposes to perform solidification at the storage and treatment facility. Solidification will be performed only when off-site land disposal is required. Our intention is to dispose of waste by burial only when no other acceptable alternative can be found. In an effort to comply with the Waste Minimization Program and the new Land Ban Restrictions, Universal Waste & Transit is attempting to reduce the volume of waste which is currently being sent out of state for land disposal by employing this solidification process.

The solidification process will employ a filter press similiar to that identified in Attachment 21. The filter press will be an 800mm device having a length of 123 inches and a width of approximately 43-1/2 inches. The filter press is manufactured of structural steel and is pneumatically operated. There are no electrical components. Only low volumes of in-plant compressed air are required for operation. Leak free operation is assured. The standard gasketed, polypropylene chamber plates are center feed, four cornered discharge type that are corrosion resistant and superior in performance. The filter cloth is held in place by a caulking cord driven into a groove around the outer perimeter of the plate recess. Gaskets around the sealing surface and ports of each plate provide a leak tight seal.

The process will be operated on a batch basis and no continuous feed is anticipated.

The process is intended to be used on non-flammable, non-RCRA corrosive wastes and therefore, the potential for the equipment to rupture, leak, corrode or otherwise fail before the end of its intended life will be minimal.

2. Inspection Procedures

The solidification area will be inspected on a daily basis to comply with the Universal Waste & Transit Inspection Plan included as Attachment 14 to this document.

As previously indicated this is a batch treatment process. The waste will be pumped into the filter press by means of an air powered diaphragm pump until the press is full. A pneumatically actuated hydraulic pump will close the press and automatically compensate for any varying temperatures or pressures that can expand or contract the polypropylene filter plate stack. An automatic feed pump control system will allow the pressure to be automatically increased in four intervals throughout the fill cycle. Continuos monitoring of the feed pump pressure allows the system to be automatically shutdown when the press has become filled. Also incorporated into this system is a low hydraulic pressure safety shutdown device. Anytime the hydraulic pressure drops below the preset limit, the system will completely shutdown elimanating any possible leaking. The filtrate will be discharged to suitable containers to determine its acceptability for either discharge to the sanitary sewer or off-site disposal. The resultant filter cake will be discharged into appropriate containers as indicated in Attachment 21.

Because of the simple design of this process, there is no need for waste feed cutoff systems, bypass systems, or pressure release systems.

3. WASTE ANALYSIS AND TRIAL TESTS

The solidification process is designed for semi-solid waste which has the potential for land disposal. Because of the recent land ban restrictions, this significantly limits the type of waste which may be acceptable for this process. It is anticipated that the majority of the waste will be metal bearing sludges and semi-solids which require further filtration.

UW&T will treat only those wastes which are acceptable for storage as specified within the UW&T Hazardous Waste Operating Permit.

As previously indicated within subsequent sections and within the UW&T Waste Analysis Plan (Volume 3), a sample of each waste must be sent to the facility prior to its acceptance. With this sample bench scale tests can be performed to determine the suitability of this material for filtration with the filter press. The information obtained from the initial waste analysis and any subsequent trial tests will be placed in the operating record for the facility.

The current use of the filter press is on a batch basis only. The current discharge of any resulting liquids is to a container. At present there is no continuous or batch discharge of liquids to any sanitary sewer connection.

In the future any discharge of liquids to the sanitary sewer would be on a case-by-case basis. Any future discharge to the sanitary sewer system must comply with all current discharge limitations imposed on industrial effluents by the City of Tampa.

Revision 1; December, 1989

3. Waste Analysis and Trial Tests

The solidification process is designed for semi-solid waste which has the potential for ultimate land disposal. Because of the recent Land Ban Restrictions, this significantly limits the type of waste which may be acceptable for this process. It is anticipated that the majority of the waste will be metal bearing sludges and semi solids which require further filtration.

As previously indicated in subsequent sections and in the Universal Waste & Transit Waste Analysis Plan (Volume 3) a sample of each waste must be sent to the facility prior to its acceptance. With this sample bench scale tests can be performed to determine the suitability of this material for filtration with the filter press. The information obtained from the initial waste analysis, and any subsequent trial tests will be placed in the operating record for the facility.

The current use of the filter press is on a batch basis only. The current discharge of any resulting liquid is to a container. At present there is no continous or batch discharge of liquids to any sanitary sewer connection.

In the future, any discharge of liquids to the sanitary sewer system would be on a case-by-case basis. Any future discharge to the sanitary sewer system must comply with all current discharge limitations imposed on industrial effluents by the City of Tampa.

REPLACED LRM

4. Requirements for Ignitable or Reactive Wastes

As previously mentioned it is not anticipated that any ignitable or reactive waste will be treated via filtration. However, in the unlikely event that this were to occur, certain precautions will be taken. As indicated, the filter press has no electrical components and therefore, is intrinsically safe for the treatment of ignitable wastes. No smoking is allowed within the facility and all ignitable wastes are kept in an area seperate from flames, sparks or accidental sources of ignition. No activities will be performed at the Universal Waste & Transit treatment facility which during any treatment process will cause the waste to ignite or react.

As indicated on the previous page and at numerous locations throughout this document, all waste which enters the facility will have been analyzed to determine its chemical composition. If, during the treatment process it is determined that a waste due to be treated is not compatible with a waste previously treated in the filter press the following steps will be taken:

- the filter cloth will be changed
- the inlet waste fill line will be purged with water
- water will be passed through the system for one fill cycle

The resulting filtrate will be analyzed for the parameters indicated on the Universal Waste & Transit Waste Disposal Request Form to determine its hazard characteristics. This liquid will be disposed of in accordance with all applicable local, state and federal regulations.

5. Closure

The Universal Waste & Transit Closure Plan is included in Volume 1 of this document. At the time of closure all hazardous waste and resulting residues will be removed from the filter press and managed in accordance with all local, state and federal regulations. These guidelines have been outlined in the Universal Waste & Transit Closure Plan.

K. CLOSURE

The Universal Waste & Transit Closure Plan is included in Volume 1 of this document. The anticipated closure date for this facility is in the year 2008. All required items are addressed within the previously referenced Closure Plan. No post closure is required for this facility.

CLOSURE PLAN
for
Universal Waste & Transit
2002 Orient Rd
Tampa, Florida

November, 1988
Revised: January 30, 1989
Revised: August 1989

TABLE OF CONTENTS

INTRODUCTION

This closure plan has been adopted in accordance with the Code of Federal Regulations, Part264, Subpart G, including the most recent revisions as specified in the Federal Register of May 2, 1986.

Owners Name	Universal Waste & Transit
Address	2002 Orient Rd.
	Tampa, Florida 33619
Telephone	813-623-5302
Contact	Sharon Roehm

Facility Address: 2002 Orient Rd.
Tampa, Florida

I. FACILITY CONDITIONS

A. General Information

Universal Waste & Transit operates a storage/treatment facility encompassing 5,866 square feet. Storage at the facility occurs in containers only. The maximum storage inventory is as indicated below:

Process Type	Volume
Container Storage	33,660 gallons

No other RCRA regulated facilities are located on-site.

B. Waste Characterization

Indicated below are the types of waste material which could potentially be on hand at the time of closure.

Waste Material	Maximum Potential Quantity on Hand
Flammable Liquid	6,490 gallons
Other Regulated Wastes	27,170 gallons
Total Quantity	33,660 gallons

Indicated below is an identification of the physical state, chemical composition and other pertinent chemical/physical data relative to each of the previously described waste streams: The actual chemical analysis for each waste container/tank will be retained within the laboratory log books, analysis log books, treatment log books, and waste profile sheets on file at the facility as well as on computer at the corporate offices.

Waste Classification:

Flammable Liquid, Combustible Liquid

Physical State Liquid

Chemical Composition

Waste solvents or mixtures of waste solvents, as well as paints, oil, and so on.

Flash Point <94 degrees C (<200 degrees F)

Other Pertinent Data

All flammable liquids and solids are stored in an explosion-proof area designed specifically for those materials. Disposal via incineration.

Waste Classification

Waste Poisonous Materials

Physical State Liquid/Solid/Semi-Solid

Chemical Composition

Pesticides; chlorinated organics; cyanides; compounds containing arsenic, mercury, and lead.

Flash Point <60 degrees C (<140 degrees F) (usually non-combustible materials)

Other Pertinent Data

Disposal via treatment or land burial.

Waste Classification

Oxidizer/Reactives

Physical State Liquid/Solid

Chemical Composition

Hypochlorite salts; peroxides; nitrates; chlorates; nitric acid; perchloric acid.

Flash Point <60 degrees C (<140 degrees F) (for liquids only if applicable)

Other Pertinent Data

Highly reactive when in contact with reducing agents or organic material. Disposal accommodated via on-site treatment.

Waste Classification

Flammable Solids

Physical State Solid

Chemical Composition

Alkali and alkaline earth metals; paint sludges and flammable solid residues

Flash Point <60 degrees C (<140 degrees F) not applicable to alkaline metals, but is employed on paint sludges and similar materials

Other Pertinent Data

Treated either by off-site treatment or land burial

Waste Classification

Waste Corrosive Materials

Physical State Liquid/Solid

Chemical Composition

Acidic and alkaline materials (i.e. hydrochloric acid; acetic acid; chromic acid; sodium hydroxide; potassium hydroxide; etc.

Flash Point <60 degrees C (<140 degrees F)

Other Pertinent Data

Treated via on-site neutralization with any generated residue being disposed of by land burial

---

Waste Classification

Hazardous Waste Liquid/Hazardous Waste Solid

Physical State Liquid/Semi-Solid/Solid

Chemical Composition

Chlorinated organic liquids; heavy metal sludges; plating wastes; etc.

Flash Point <60 degrees C (<140 degrees F)

Other Pertinent Data

Liquid wastes are disposed of by on-site treatment or incineration. Solid material are disposed of by land burial.

C. Schedule for Final Closure

Indicated below is our schedule for final closure of the Universal Waste & Transit storage/treatment facility.

1. Final date of waste acceptance: January 7, 2008
2. Date that all preprocessing will be completed: January 28, 2008
3. Date that all inventory has been removed off-site: March 3, 2008
4. Date of final facility decontamination: March 17, 2008
5. Final date of facility closure: March 31, 2008
6. Total time required to close the facility: Twelve (12) weeks (84 days).

The Regional Administrator and Florida DER will be informed of our planned closure no later than November 7, 2008 in compliance with 40CFR264.112(d).

II OFF-SITE TREATMENT OR DISPOSAL

A. General Information

A total of 33,660 gallons will be available for shipment to off-site treatment or disposal facilities. These are as indicated:

Waste Materials	Maximum Quantity On-Site
Flammable Liquids	6,490 gallons
Oxidizers/Reactives/Flammable Solids	1,320 gallons
Poisonous Wastes	3,850 gallons
Hazardous Waste Solid	9,625 gallons
Hazardous Waste Liquid	7,975 gallons
Corrosives	4,400 gallons
Total Quantity Available for Off-Site Treatment/Disposal at Time of Closure	33,660 gallons

B. Flammable Liquids

All flammable liquids on hand at the time of closure would be removed by means of vacuum tanker and transported to either Oldover Corp. or International Solvent Recovery for incineration or recycle. We estimate that 6,490 gallons of waste flammable liquids could be on hand at the Universal Waste & Transit storage facility at the time of closure.

Universal Waste & Transit will arrange for two 5000 gallon tankers capable of removal and transportation of flammable liquid wastes. If 3,245 gallons of liquids are placed into each tanker, it would require two tanker loads to remove all waste flammable liquids present in storage at the time of closure. Based upon past experience, we know that we can move at least two tanker loads per day, and therefore the removal of all flammable liquid wastes at the time of closure would require no more than two (2) days of effort.

C. Oxidizer/Reactive/Flammable Solids

We are estimating that 1,320 gallons of oxidizer, reactive or flammable solid waste could be on hand at the time of closure. These would be disposed of as follows:

- 275 gallons of alkalai or alkaline earth metals; sulfides, peroxides or nitrating compounds to BDT Corporation in New Jersey, for treatment.
- 1,045 gallons of flammable solids (paint sludge etc.) to ENSCO located in Arkansas for incineration.

We estimate that one (1) week would be required for transport of the reactives to BDT Corporation. The materials which are to be transported to ENSCO would be combined with other waste destined for that location (see Section E).

D. Hazardous Waste Solid/Poisonous Material

A large volume of the remaining wastes which are on hand at the time of closure would be disposed of via land burial at Chemical Waste Management Incorporated located in Emelle, Alabama. Samples of these waste materials would be obtained and data submitted on a Chemical Waste Management Waste Profile Sheet. Both samples and the completed profile sheet would be submitted to Chemical Waste Management to obtain an approval for disposal. This process generally requires 30 days from the time of sample submission.

We are estimating that 13,475 gallons of waste material could be on hand at Universal Waste & Transit at the time of closure. This includes 9.625 gallons of hazardous waste solids; and 3,850 gallons of DOT listed poisonous waste and/or RCRA toxic wastes. Universal Waste & Transit will arrange for two tractor trailers capable of transporting 80 drums per load to the Chemical Waste Management facility. Based upon past experience, we would estimate that two loads per week could be transported to Alabama per truck. Therefore, a total of 2 weeks would be required for transportation of the waste. Thus, from the time of final waste acceptance until all waste material has been removed for disposal at Chemical Waste Management no more than 6-weeks would be required.

E. Hazardous Waste Liquids

A substantial volume of RCRA regulated liquid waste (7,975 gallons) could be on hand at the time of closure. These liquids would not be flammable nor corrosive and would therefore fall under the generic DOT classification of "Hazardous Waste Liquid, N.O.S.".

These wastes would be transported, via tractor trailer, to ENSCO in Arkansas for incineration. Two loads would be required which would take approximately two weeks.

F. Corrosive Liquids

A total of 4,400 gallons of RCRA regulated corrosive wastes (D-002) could be on hand at the time of closure.

These wastes would be transported to Environmental Enterprises Inc., located in Cincinnati, Ohio for treatment.

One tractor trailer would be required to transport this waste.

We estimate one week for completion of this task.

III. Decontamination

The Universal Waste & Transit storage/treatment facility is totally enclosed. The facility construction is concrete, concrete block and metal and therefore no subsurface soil contamination will result during any period of the facility's operation. However, soil sampling will still be performed at four locations around the site. (See page 36 & 37 of this section)

All process equipment will be cleaned with water, solvent or both and the resultant liquid sent to ENSCO for incineration. We are estimating that no more than 275 gallons of liquid residue will be generated during the decontamination process. All other equipment and the floors will then be steam cleaned to insure that all residue has been removed. This liquid will be analyzed to determine its acceptability for placement into sanitary sewer system. If the liquid waste generated from the decontamination procedure does not meet a licensed POTW discharge standards, it will be placed into tankers and transported to ENSCO for subsequent incineration. No more than 2,000 gallons of this decontamination liquid is anticipated.

III DECONTAMINATION

The Universal Waste & Transit storage/treatment facility is totally enclosed. The facility construction is concrete, concrete block and metal and therefore no subsurface soil contamination will result during any period of the facility's operation. However, soil sampling will still be performed at four locations around the site.

All process equipment will be cleaned with water, solvent or both and the resultant liquid sent to ENSCO for incineration. We are estimating that no more than 275 gallons of liquid residue will be generated during the decontamination process. All other equipment and the floors will then be steam cleaned to insure that all residue has been removed. This liquid will be analyzed to determine its acceptability for placement into the sanitary sewer system. If the liquid waste generated from the decontamination procedure does not meet a licensed POTW discharge standards, it will be placed into tankers and transported to ENSCO for subsequent incineration. No more than 2,000 gallons of this decontamination liquid is anticipated.

REPLACED LRM

G. EMPTY CONTAINERS

All empty containers resulting from the bulking of material from drums into tankers will be transported to a metal reclamation facility.

The only wastes which are transferred from containers to tankers are flammable liquids. These wastes will not meet the criteria for classification as an acutely toxic waste and therefore will not require triple rinsing.

All such liquids will be transferred from the containers in a manner that will insure that they meet the statutory definition of an "empty" container.

There will be no additional cost to UW&T for the recycling of empty containers and therefore no change in the closure cost estimate.

Revision 1: December, 1989

All decontamination will be performed by outside contractors.

Once all liquid waste has been either transferred to a licensed POTW or transported to ENSCO for incineration, all tankers will be cleaned with water/industrial detergent and subsequently steam cleaned to insure that decontamination has occurred. Again, this liquid will be analyzed to determine its acceptability for transport to a licensed POTW. If the first cleaning of the tanker is not acceptable to a licensed POTW it will be transported to ENSCO for incineration. This process will continue until such time as the liquid residue in the tanker meets a licensed POTW's discharge requirements. We estimate that no more than 2,000 gallons of liquid will be generated in this manner.

It is our best estimate that no more than two (2) weeks will be required to fully decontaminate all equipment and the storage facility itself.

replaced LRM

IV CLOSURE CERTIFICATION

Universal Waste & Transit will subcontract the closure certification to a registered professional engineer licensed within the State of Florida. It is anticipated that three on site inspections by the registered professional engineer will occur during the closure period. Those inspections are indicated below:

1st. inspection: Final date of waste acceptance

2nd. inspection: Upon completion of all removal for off-site disposal.

3rd. inspection: Upon completion of all decontamination

It is the intent of these inspections to insure that all materials are being handled in accordance with our Closure Plan. An independent analytical laboratory will perform swab sampling of the building interior and soil sampling on the building exterior. This will insure that decontamination is satisfactory, Universal Waste & Transit will submit, at the time of closure, a list of parameters for which the samples will be analyzed. Upon completion of the final inspection by the registered professional engineer, a certification that closure has been completed will be submitted to the Regional Administrator and Florida DER by both Universal Waste & Transit and the independent registered professional engineer. These certification statements are shown in Attachments 1 and 2. These certifications will be sent within 60 days of completion of closure by registered mail.

V CLOSURE COST ESTIMATE

Indicated below is our most recent closure cost estimate based upon the quantities of materials indicated in our Closure Plan and the methods indicated for treatment/disposal of those waste materials.

A. Liquid Waste for Incineration at ENSCO

9,020 gallons of non-flammable liquid waste

4,275 gallons of decontamination liquid

Total 13,295 gallons for incineration

13,295 gallons is equivalent to 3 truck loads for incineration

Based upon an average cost of $2.73/gallon the total cost for incineration would therefore be $36,295.35.

Transportation cost for removal and transport from Universal Waste & Transit to ENSCO is approximately:

$1200/load or $3,600.00 total cost.

13,295 gallons x $2.73/gallon	=	$36,295.35
3 x $1200.00/load	=	3,600.00
Subtotal		$39,895.00

B. Solid Materials for Land Disposal at Chemical Waste Management in Emelle, Alabama

13,475 gallons of hazardous waste solid

This volume of waste can be transported in three truckloads to CWM.

13,475 gallons at disposal cost of $1.09/gallon	=	$14,687.75
Transportation cost at $1200/truckload	=	3,600.00
Subtotal for CWM		$18,287.75

C. Treatment of Corrosive Liquids at Environmental Enterprises, Cincinnati, Ohio

This treatment will include the following:

4,400 gallons of corrosive liquid

This volume of waste can be transported in one truckloads.

The average cost of corrosive waste treatment at Environmental Enterprises is $1.05/gallon.

Based upon 4,400 gallons at $1.05/gallon a total cost for treatment of corrosive liquids would be $4,620.00.

Transportation cost per truckload would be $1,200.00.

The total cost for transportation and disposal of corrosive liquids at EEI would be $6,120.00

D. Treatment of Reactive Waste at BDT in New Jersey

This small quantity of waste materials will be transported to BDT in New Jersey for treatment. Approximately 275 gallons could be at the facility during closure.

275 gallons at a treatment cost of $6.00/gallon =	$1,650.00
Transportation of 275 gallons at a cost of $2.00/gal	550.00
Total Transport and Treatment Cost	$2,200.00

E. Recycle/Incineration of Flammable Wastes at Oldover Corp. or International Solvent

An estimated 6,490 gallons of flammable liquid could be on hand at the time of closure. These materials would be sent to either Oldover Corp. or International Solvent for recycle or incineration. Two truckloads would be necessary for transport to these facilities.

Based upon past experience our worst case disposal cost estimate for this waste material would be about $.50/gallon.

6,490 gallons x $.50/gallon	=	$3,245.00
2 truckloads x $500/load	=	1,000.00
Total cost for disposal	=	$4,245.00

F. Decontamination

All decontamination of the facility, equipment, and vehicles will be in accordance with our Closure Plan. It is estimated that no more than $1,000 would be required to insure complete decontamination. Removal and disposal costs for decontamination have already been accounted for separately. All labor costs are indicated in a subsequent section.

G. Professional Engineer Certification

The cost for certification by a registered professional engineer visiting the facility three times and certifying that closure is in accordance with the Universal Waste & Transit Closure Plan is estimated at no more than $2,000.

H. Labor

It is our estimate that approximately 400 hours of labor will be required to insure that closure is completed as indicated in the Universal Waste & Transit Closure Plan. At an average rate of $10/hour, this cost is $4,000. It should be noted that all cost for transportation related labor have been previously addressed.

I. Closure Cost Summary

Liquid Waste Incineration	$ 39,895.35
Land Disposal at CWM	18,287.75
Corrosive Liquid Treatment	6,120.00
Reactive Treatment	2,200.00
Flammable Liquid Incineration	4.245.00
Decontamination (equip & filter press)	1,000.00
Certification	2,000.00
3rd Party Administration & Overhead Cost	6,000.00
Labor	4,000.00
TOTAL CLOSURE COST	$ 83,748.10

VI TRUST FUND

An irrevocable trust fund will be instituted in the amount of $83,748.10. Payments to the trust fund will be made annually during the term of the permit or over the estimated life of the facility. The first payment will be made prior to receipt of any waste at the facility. Subsequent payments will be made within 30 days of the anniversary of the first payment.

VII CLOSURE COST ADJUSTMENT

This closure cost estimate will be adjusted within 30 days after each anniversary of the date of permit issuance. The adjustment will be made by multiplying this closure cost estimate by the inflation factor. Subsequent adjustments will be made by multiplying the most recent closure cost estimate by the latest inflation factor.

ATTACHMENT 2

I, _____, of
owner or operator

_____
Name and address of hazardous waste facility

hereby state and certify that, to the best of my knowledge and belief, the above named hazardous waste facility has been closed in accordance with the attached approved closure plan, and that the closure was completed on the ____day of _____, 19___.

_____ _____
signature date

ATTACHMENT 3

I, _____, a certified professional engineer, hereby certify, to the best of my knowledge and belief, that I have verified that Professional Engineer Closure Certificates were issued for all prior closure activities at

_____ and
hazardous waste facility

that I have made visual inspection(s) of the aforementioned facility, and closure of the aforementioned facility has been performed in accordance with the closure plan for the facility approved by the Regional Administrator for Region_____of the United States Environmental Protection Agency.

_____ _____
signature date

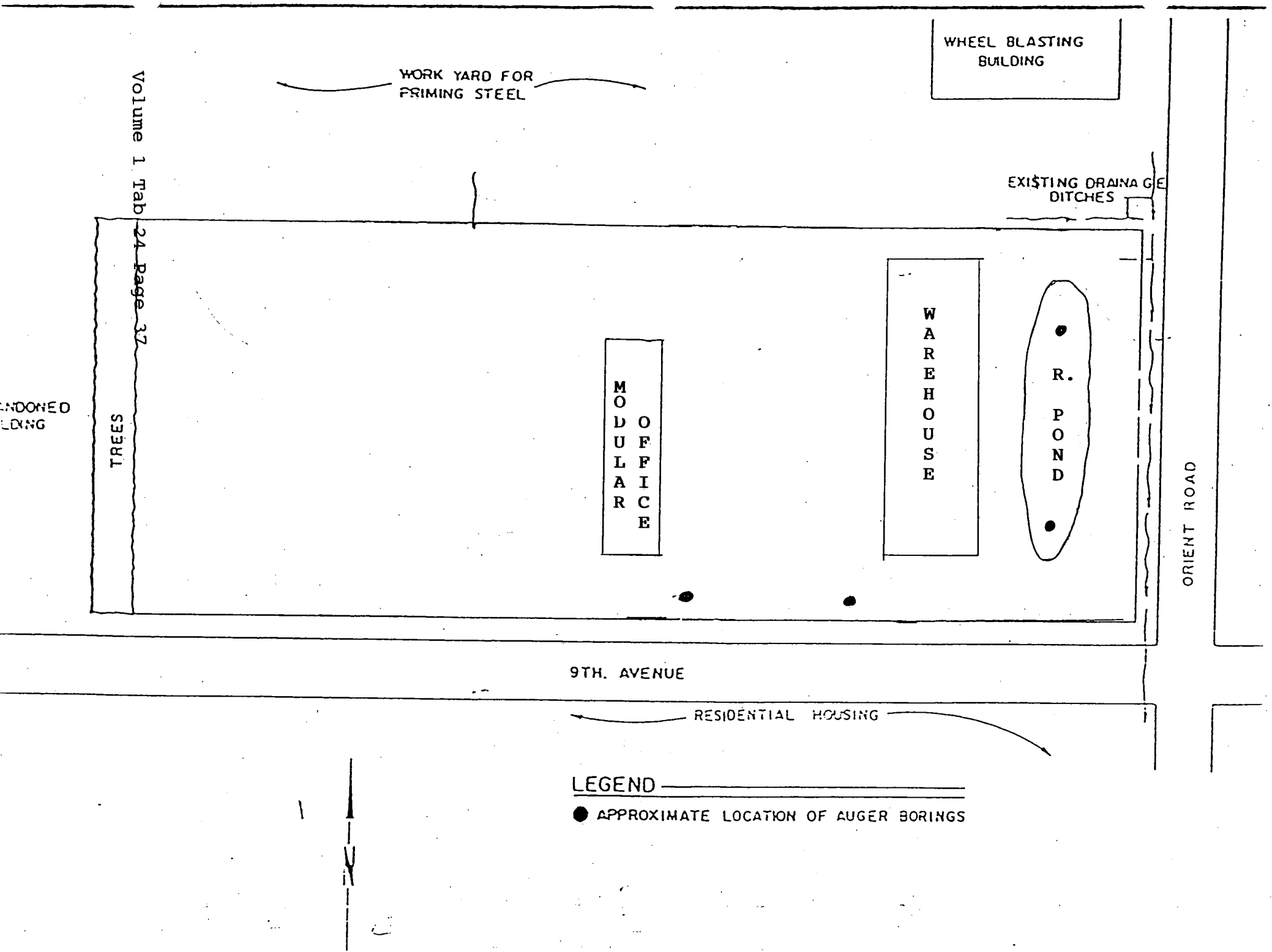
_____
State Professional Engineer License No., issued by the State of

_____
business address and telephone number

CLOSURE SOIL SAMPLING

As required in 40 CFR 264.112 (d), the FDER will be notified at least 30 days prior to final closure. We believe that a more prudent time to discuss the location of soil borings would be at the time of this notification. This will ensure that sufficient operating information is available to locate the soil borings in areas which would generate the most useful information. Attached is a map detailing the possible locations of the four soil samples. These locations were selected based on water run off from the facility. See enclosed map.

Revised February, 1990


WHEEL BLASTING BUILDING
WORK YARD FOR PRIMING STEEL
Volume 1 Tab 24 Page 37
EXISTING DRAINAGE DITCHES
TREES
MODULAR OFFICE
WAREHOUSE
R. POND
ORIENT ROAD
9TH. AVENUE
RESIDENTIAL HOUSING
LEGEND
APPROXIMATE LOCATION OF AUGER BORINGS

C. TANKS

No tank storage is requested in this application.

D. SURFACE IMPOUNDMENTS

No surface impoundments are proposed at this facility.

E. WASTE PILES

No waste piles will be present at this proposed facility.

F. LAND TREATMENT

No land treatment of hazardous waste will be performed at this facility.

G. LAND FILLS

No land fills or land disposal will be performed at this facility or on the property upon which this facility is located.

H. INCINERATORS

No incineration will be performed at this facility.

I. THERMAL TREATMENT

No thermal treatment will be performed at this facility.

L. COMPLIANCE SCHEDULE

No compliance schedule is requested in this application.

M. GROUND WATER PROTECTION

As required in 40CFR Part264 Subpart F, Universal Waste & Transit believes it is exempt from these regulations as specified in Paragraph 264.90 (b) (2)(iii). As previously described this facility has been designed to exclude liquid precipitation and other means of run-on and run-off. Universal Waste & Transit however, has installed several monitoring wells (one up-gradient and one down-gradient) at the facility as indicated in Attachment 15. These wells will be monitored on an annual basis and the data included within the facility Operating Record.

N. RESEARCH, DEVELOPMENT AND DEMONSTRATION

No research, development and demonstration is anticipated at this facility.

O. EXPOSURE INFORMATION

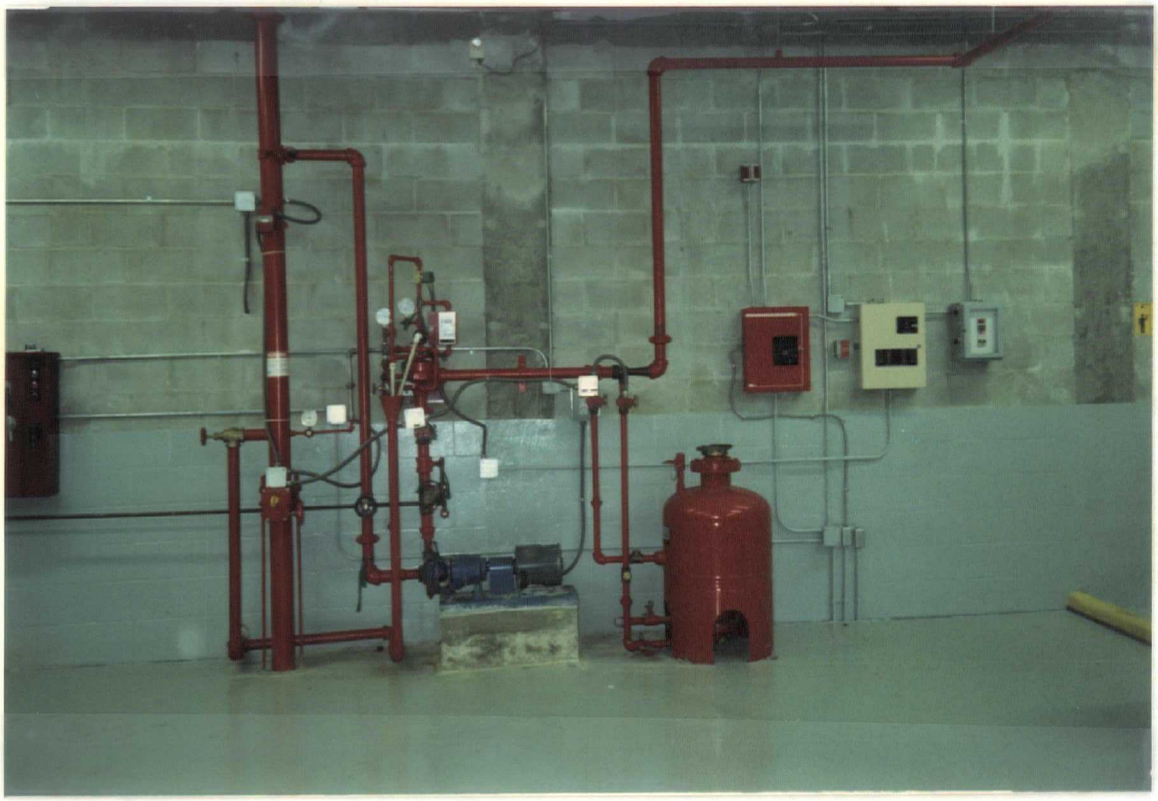
No surface impoundment or landfill is proposed at this facility.

P. RELEASES FROM SOLID WASTE MANAGEMENT UNITS

No previous, present or proposed releases from solid waste management units have occurred or are anticipated at this facility. The completed form, however, has been signed and certified and is included as Attachment 2 to this document.

Q. CERTIFICATION STATEMENTS

The certifications for operator; facility owner; landowner; and professional registered engineer are included with Attachment 2 of this document.




SCOTT