

## Kruchell, Carrie L.

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**From:** Stuart Stapleton <Stuart.Stapleton@usecology.com>  
**Sent:** Thursday, May 19, 2016 5:36 PM  
**To:** Kruchell, Carrie L.; Knauss, Elizabeth; Honey, Kelly  
**Cc:** Gene Cieply; Ken Dean  
**Subject:** RAI Response

Carrie,

I have the signed and sealed application documents and they have been included in the application. I also changed the revision number and revision date. All of the files have been uploaded to <ftp://ftp.dep.state.fl.us/pub/incoming/dwm/EQ> Florida RAI Response. A hard copy is being overnighted to you, Beth and Kelly tomorrow morning.

Please let me know if you need anything else.

### Stuart Stapleton

EHS Manager



[stuart.stapleton@usecology.com](mailto:stuart.stapleton@usecology.com)

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7202 East Eighth Ave. Tampa, FL 33619

*Emergency Response: 800.839.3975*

*Customer Service: 800.592.5489*



**VOLUME 1 OF 3**

**Permit Modification Application**

**FOR**

**Modification Application for Operation of a  
Hazardous Waste Treatment and Storage Facility**

**AT**

**7202 East 8<sup>th</sup> Avenue  
Tampa, FL 33619**

***Permit No.: 34875-HO-011***

**EQ Florida, Inc.  
7202 East 8<sup>th</sup> Avenue  
Tampa, FL 33619**

**Revision: 01  
May 13, 2016**

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## **COMMON ABBREVIATIONS**

BCSA – Bulk Container Storage Area  
CSB – Container Storage Building  
EQ – EQ Florida, Inc.  
I/O – Inbound/Outbound Staging Area  
ISCA – Improved Secondary Containment Area  
LDR – Land Disposal Restrictions  
OCA – Offsite Consequence Analysis  
PFT – Paint Filter Test  
TCLP – Toxicity Characteristic Leachate Procedure  
UHC – Underlying Hazardous Constituents  
VOC – volatile Organic Compound  
UTS – Universal Treatment Standards  
WPB – Waste Processing Building

## 1.0 FDEP APPLICATION FORMS

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### APPLICATION FOR A HAZARDOUS WASTE PERMIT PART I - GENERAL TO BE COMPLETED BY ALL APPLICANTS

Please Type or Print

#### A. General Information

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

☐ DISPOSAL

☐ Landfill ☐ Land Treatment ☐ Surface Impoundment

☐ Miscellaneous Units Type of Unit \_\_\_\_\_

☒ STORAGE

☒ Containers ☐ Tanks ☐ Piles

☐ Surface Impoundment ☐ Containment Building

☐ Miscellaneous Unit Type of Unit \_\_\_\_\_

☒ TREATMENT

☒ Tanks ☐ Piles ☐ Surface Impoundment

☐ Incineration ☐ Containment Building

☐ Boiler / Industrial Furnace Type of Unit \_\_\_\_\_

☐ Miscellaneous Unit Type of Unit \_\_\_\_\_

2. Type of application: Modification to:

☐ Construction Permit

☐ Operation Permit

☒ Construction & Operation Permit

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

☐ Postclosure Permit

☐ Clean Closure Plan

☐ Subpart H Remedial Action Plan

☐ Equivalency Demonstration

3. Revision Number: 01

4. Date current operation began, or is expected to begin: 07 / 01 / 1990

5. Facility Name EQ Florida, Inc.

6. EPA/DEP I.D. No. FLD981932494

7. Facility location or street address 2002 North Orient Road

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8. Facility mailing address 7202 East 8th Avenue  
street or P.O. Box  
Tampa FL 33619  
city state zip

9. Contact person Stuart Stapleton Telephone ( 813 ) 319-3423  
 Title EHS Manager

Mailing address 7202 East 8th Avenue  
street or P.O. Box  
Tampa FL 33619  
city state zip

E-mail address gene.cieply@usecology.com

10. Operator's name Gene Cieply Telephone ( 813 ) 319-3410  
 Mailing address 7202 East 8th Avenue  
street or P.O. Box  
Tampa FL 33619  
city state zip

E-mail address gene.cieply@usecology.com

11. Facility owner's name Gene Cieply Telephone ( 813 ) 319-3410  
 Mailing address 7202 East 8th Avenue  
street or P.O. Box  
Tampa FL 33619  
city state zip

E-mail address dwolf@usanova.com

12. Legal structure  
☒ Corporation ☐ Non-profit corporation ☐ Partnership ☐ Individual  
☐ Local government ☐ State government ☐ Federal government ☐ Other

13. If an individual, partnership, or business is operating under an assumed name, specify the county and state where the name is registered.  
 County N/A State N/A

14. If the legal structure is a corporation, indicate the state of incorporation.  
 State of incorporation Michigan

15. If the legal structure is an individual or partnership, list the owners.  
 Name N/A  
 Address N/A  
Street or P.O. Box city state zip  
 Name N/A  
 Address N/A  
Street or P.O. Box city state zip

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16. Site ownership status

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

If leased, indicate land owner's name \_\_\_\_\_

Address \_\_\_\_\_  
Street or P.O. Box city state zip

E-mail address \_\_\_\_\_

17. Name of engineer Daniel Wolf Registration No. 46774

Address 1226 Tech Boulevard, Tampa, FL, 33619  
Street or P.O. Box city state zip

Associated with NOVA Engineering and Environmental

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

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

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
See Attached				

**B. Site Information**

1. The facility is located in Hillsborough County.

The nearest community to the facility is Tampa

Latitude 27 Deg, 57 Min, 44.95 Sec N Longitude 82 Deg, 22 Min, 26.17 Sec W

Method and datum Facility Center on Google Earth

2. The area of the facility site is 4.46 (MOL) acres.

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

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4. Attach a topographic map which shows all the features indicated in the instructions for this part.
5. Is the facility located in a 100-year flood plain? ☐ Yes ☒ No
6. The facility complies with the wellhead protection requirements of Chapter 62-521, F.A.C.  
☒ Yes ☐ No

**C. Land Use Information**

1. The present zoning of the site is IH Industrial Heavy (See Figure 3).
2. If a zoning change is needed, what should the new zoning be? N/A.

**D. Operating Information**

1. Is waste generated on-site? ☒ Yes ☐ No
2. List the NAICS codes (5 to 6 digits) 562211 562111 562219 562112  
\_\_\_\_\_
3. Use the codes and units provided in the instructions to complete the following table.  
Specify:
  - a. Each process used for treating, storing or disposing of hazardous waste (including design capacities) at the facility, and
  - b. The hazardous waste(s) listed or designated in 40 CFR Part 261, including the annual quantities, to be treated, stored, or disposed by each process at the facility.

PROCESS CODE	PROCESS DESIGN CAPACITY AND UNITS OF MEASURE	HAZARDOUS WASTE CODE	ANNUAL QUANTITY OF HAZARDOUS WASTE AND UNITS OF MEASURE
See Appendix B	in Application	Volume 2 of 3	

EQ Florida, Inc. Environmental Permit List			
Permit	Permit #	Agency	Expiration Date
EPA ID #	FLD981932494	FDEP	N/A
EPA STORM WATER NOI MULTI-SECTOR	FLR05E179	FDEP	7/21/2016
ENVIRONMENTAL RESOURCES PERMIT	29-024691-003	FDEP	N/A
SOLID WASTE PERMIT	34757-010/SO/30	FDEP	4/1/2019
MERCURY STORAGE & TRANSPORTER	FLD981932494	FDEP	3/1/2017
HAZARDOUS WASTE TRANSPORTER	FLD981932494	FDEP	6/30/2017
TAMPA PORT AUTHORITY WASTE OIL	N/A	TPA	9/30/2016
WASTE TIRE COLLECTOR	00044633	FDEP	4/1/2017
USED OIL COLLECTION & TRANSPORTER	FLD981932494	FDEP	6/30/2017
BROWARD CO. WASTE TRANSPORTER	WT-14-0018	DNRP	4/30/2018
HAZARDOUS WASTE PERMIT (TSDF)	34875-HO-011	FDEP	4/1/2019

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**P. Information Regarding Potential Releases From Solid Waste Management Units**

Facility Name EQ Florida, Inc.

EPA/DEP I.D. No. FLD981932494

Facility location Tampa FL  
city state

1. Are there any of the following solid waste management units (existing or closed) at your facility? A solid waste management unit (SWMU) is a discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include all areas at a facility where solid wastes have been routinely and systematically released.

**DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION.**

landfill	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
surface impoundment	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
land farm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
waste pile	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
incinerator	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
storage tank	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
container storage area	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
injection wells	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
wastewater treatment units	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
transfer station	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
waste recycling operations	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
land treatment facility	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
boiler/industrial furnace	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
other (units not listed above)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

2. If there is a "yes" answer to any of the items in one (1.) above, on separate sheet(s) of paper, provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, focus on whether or not the wastes would be considered hazardous wastes or hazardous constituents under RCRA. (Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.) Include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Provide a description of each unit and include capacity, dimensions, and location at the facility. Provide a site plan, if available, and the dates of operation of the unit [40 CFR 270.14(d)(1)].



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3. On separate sheet(s) of paper, describe all data available on all prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring, for each unit noted in one (1.) above and also for each hazardous waste unit in your Part B application [40 CFR 270.14(d)(2)].

Provide the following information for each SWMU:

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

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

**Signature and Certification**

Facility Name EQ Florida, Inc.

EPA/DEP I.D. No. FLD981932494

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

**1. Facility Operator**

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

  
Signature of the Operator or Authorized Representative\*

Gene Cieply / General Manager

Name and Title (Please type or print)

Date May 13, 2016 E-mail address gene.cieply@usecology.com

Telephone (813) 319-3410

- **Attach a letter of authorization**

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**2. Facility Owner**

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

Signature of the Facility Owner or Authorized Representative\*

Gene Cieply / General Manager

Name and Title (Please type or print)


Date May 13, 2016 E-mail address gene.cieply@usecology.com

Telephone (813) 319-3410

\* Attach a letter of authorization

**3. Land Owner**

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

  
Signature of the Land Owner or Authorized Representative\*

Gene Cieply / General Manager

Name and Title (Please type or print)

Date May 13, 2016 E-mail address gene.cieply@usecology.com

Telephone (813) 319-3410

\* Attach a letter of authorization

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**4. Professional Engineer Registered in Florida**

Complete this certification when required to do so by Chapter 471, F.S., or when not exempted by Rule 62-730.220(9), F.A.C.

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

Signature

Daniel Wolf, PE, CIH

Name (please type)

Florida Registration Number 46774

Mailing Address 1226 Tech Boulevard

street or P.O. Box

Tampa

FL

33619

city

state

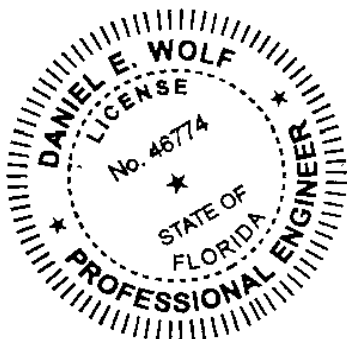
zip

Date May 13, 2016

E-mail address dwolf@usanova.com

Telephone (813) 623-3100

**(PLEASE AFFIX SEAL)**



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**5. Professional Geologist Registered in Florida**

Complete this certification when required to do so by Chapter 492, F.S., or when not exempted by Rule 62-730.220(10), F.A.C.

This is to certify that the interpretations of geology at this hazardous waste management facility have been examined by me, and the interpretations conform to sound geological principles. In my professional judgement, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and the rules of the Department of Environmental Protection.

Signature \_\_\_\_\_

**NOT APPLICABLE**

Name (please type) \_\_\_\_\_

Florida Registration Number \_\_\_\_\_


Mailing Address \_\_\_\_\_  
street or P.O. Box

\_\_\_\_\_ city state zip

Date \_\_\_\_\_ E-mail address \_\_\_\_\_

Telephone (\_\_\_\_) \_\_\_\_\_

**(PLEASE AFFIX SEAL)**

 <b>8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY</b> DEP Waste Management Division-HWRS, MS4560 2600 Blair Stone Rd. Tallahassee, FL 32399-2400 (850) 245-8707		Date Received (for FDEP Official Use Only)	
EPA ID: <b>F L D 9 8 1 9 3 2 4 9 4</b>		Please use the instructions document to complete this form	
<b>1. Reason for Submittal</b> <small>(all submitters must complete pages 1 and 2 and sign page 5. Pages 3 and 4, - complete as applicable)</small>		<b>Mark 'X' in the correct box:</b> <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, used oil activities, or PCW activities). <input checked="" type="checkbox"/> To provide subsequent notification (to update status and facility identification information). <input type="checkbox"/> To provide the final notification (closing) for the facility. (see instructions—must complete pages 1,2,5) <b>FL Registration(s)</b> <input checked="" type="checkbox"/> UW Mercury (see page 3) <input checked="" type="checkbox"/> HW Transporter (see page 4) <input checked="" type="checkbox"/> Used Oil (see page 4)	
<b>2. Facility or Business Name</b>		<b>EQ Florida, Inc.</b>	
<b>3. Facility Operator</b> <small>(List additional Operators in the comments section.)</small>		Name of Operator: <b>EQ Florida, Inc.</b> Date became Operator: <u>02 / 02 / 04</u> Street or P.O. Box: <b>7202 East 8th Avenue</b> Phone Number: <b>813-319-3423</b> City or Town: <b>Tampa</b> State: <b>FL</b> Zip Code: <b>33619</b> Country (if not USA): Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> County <input type="checkbox"/> Other	
<b>4. Facility Physical Location Information</b> <small>(No P.O. Boxes)</small> <input checked="" type="checkbox"/> Same address as #3 above or:		Physical Street Address: <b>2002 North Orient Road</b> <input type="checkbox"/> Vessel City or Town: <b>Tampa</b> State: <b>FL</b> Zip Code: <b>33619</b> County: <b>Hillsborough</b> Country (if not USA):	
<b>5. Facility North American Industry Classification System (NAICS) Code(s)</b> <small>(at least 5 digits)</small>		A. <u>5</u> <u>6</u> <u>2</u> <u>2</u> <u>1</u> <u>1</u> (required)    B. <u>5</u> <u>6</u> <u>2</u> <u>1</u> <u>1</u> <u>1</u> C. <u>5</u> <u>6</u> <u>2</u> <u>2</u> <u>1</u> <u>9</u> D. <u>5</u> <u>6</u> <u>2</u> <u>1</u> <u>1</u> <u>2</u>	
<b>6. Facility or Business Mailing Address</b>		<input checked="" type="checkbox"/> Same address as #3 above or: Street or P.O. Box: City or Town:    State:    Zip/Postal Code:    Country (if not USA):	
<b>7. Facility or Business RCRA Contact Person</b>		First Name: <b>Stuart</b> Last Name: <b>Stapleton</b> Title: <b>EHS Manager</b> Phone Number: <b>813-319-3423</b> Extension:    E-Mail: <b>stuart.stapleton@usecology.com</b> Fax: <b>813-626-7451</b> Street or P.O. Box: City or Town:    State:    Zip Code:    Country (if not USA):	
<b>8. Real Property (FL Land) Owner of the Facility's Physical Location</b> <small>(List additional owners in the comments section.)</small> <input checked="" type="checkbox"/> Same address as #3 above or:		Name of Owner: <b>EQ Holdings, Inc.</b> Date became Owner: <u>02 / 02 / 04</u> <input type="checkbox"/> New Owner    mm    dd    yy Street or P.O. Box:    Phone Number: City or Town:    State:    Zip Code:    Country (if not USA): Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> County <input type="checkbox"/> Other	

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. Effective Date April 23, 2013 Page 1 of 5

<b>RCRA Hazardous Waste Status Notification or Out of Business Notification</b>				EPA ID No. <b>FLD981932494</b>			
<b>9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):</b>							
<b>(A) (1)Generator of Hazardous Waste</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Do not include Universal Waste or Used Oil) If YES, Choose only one of the following three categories. <input checked="" type="checkbox"/> <b>a. Large Quantity Generator (LQG):</b> Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of non-acute hazardous waste; or Greater than 1 kg (2.2 lbs) of acute hazardous waste (at least once a year) <input type="checkbox"/> <b>b. Small Quantity Generator (SQG):</b> Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste (at least once a year) <input type="checkbox"/> <b>c. Conditionally Exempt SQG (CESQG):</b> Generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs) or less of acute hazardous waste In addition, indicate other generator activities that apply. <input type="checkbox"/> d. Short-Term Generator (one-time, not on-going) <input type="checkbox"/> e. Episodic: Not more than one-time per year: __SQG__LQG <input checked="" type="checkbox"/> f. United States Importer of hazardous waste <input type="checkbox"/> g. Mixed Waste (hazardous and radioactive) Generator				<b>For Items 2 through 7, mark 'X' in all that apply.</b> <b>(2) Treater, Storer, or Disposer of Hazardous Waste</b> (at your facility) Note: A hazardous waste permit may be required for this activity. <input checked="" type="checkbox"/> a. Operating Commercial TSD <input type="checkbox"/> b. Operating Non-Commercial TSD <input type="checkbox"/> c. Non-Operating: Postclosure or Corrective Action Permit or Order (HSWA, etc.) <b>(3) Recycler of Hazardous Waste (at your facility)</b> Specify: <input type="checkbox"/> Commercial <input type="checkbox"/> Non-Commercial. Note: A permit is required for storage prior to recycling. <b>(4) Exempt Boiler and/or Industrial Furnace</b> <input type="checkbox"/> a. Small Quantity On-site Burner Exemption <input type="checkbox"/> b. Smelting, Melting, and Refining Furnace Exemption <b>(5) Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities</b> Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP. <b>(6) Receives Hazardous Waste from Off-Site</b> <input type="checkbox"/> <b>(7) Underground Injection Control</b> <input type="checkbox"/>			
<b>10. Waste Codes for Federally Regulated Hazardous Wastes:</b> List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, K019, P012, U112). Hazardous waste transporters list codes routinely or usually transported. Use comments or an additional page if more spaces are needed.							
<sup>1</sup> D001	<sup>2</sup> D002	<sup>3</sup> D003	<sup>4</sup> D004	<sup>5</sup> D005	<sup>6</sup> D006	<sup>7</sup> D007	
<sup>8</sup> D008	<sup>9</sup> D009	<sup>10</sup> D010	<sup>11</sup> D011	<sup>12</sup> D012	<sup>13</sup> D013	<sup>14</sup> D014	
<sup>15</sup> D015	<sup>16</sup> D016	<sup>17</sup> D017	<sup>18</sup> D018	<sup>19</sup> D019	<sup>20</sup> D020	<sup>21</sup> D021	
<b>11. Other Status Changes</b> (If no longer handling waste or closed, sections 9 and 10 should be blank and skip Section 12-16): <b>(A) Non-Handler of Regulated Waste at This Facility</b> (Sections 9, 10 and 12-16 should be blank.) <input type="checkbox"/> (1) Business no longer generates, transports, treats, stores, disposes of, or otherwise handles any regulated waste. <b>(B) Facility Closed</b> (Complete this section only if <u>all</u> business activities at this facility have ceased.) <input type="checkbox"/> (1) Closed at this location and moved or moving to another - Submit a new Form 8700-12FL for the new location if you will <input type="checkbox"/> (2) Out of Business - Business closed on _____ (date) <input type="checkbox"/> <b>(C) Property Tax Default</b> <input type="checkbox"/> <b>(D) Petition for Bankruptcy Protection</b>							
<b>12-14 — Registration Activities Contact Information</b> (only if this submission is a registration or registration information update): <input checked="" type="checkbox"/> Same as Facility RCRA Contact on page 1 or enter: Contact for: <input checked="" type="checkbox"/> HW Transporter <input type="checkbox"/> Used Oil Handler <input type="checkbox"/> Universal Waste							
First Name:		Last Name:		Title:			
Phone Number:		Extension:		E-Mail:			
Street or P.O. Box:							
City or Town:				State:(Country):		Zip Code:	

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. Effective Date April 23,2013 Page 2 of 5

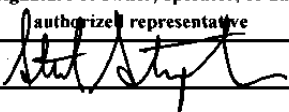
<b>Universal Waste Notification and Mercury Transporter/Handler Registration</b>		EPA ID No. <b>FLD981932494</b>
<b>12. Universal Waste (UW) Activities (Mark 'X' and complete all that apply) :</b>		
<b>A. Federal Notification</b>	<input type="checkbox"/> <b>Federally Defined Large Quantity Handler (LQH) = Generate/Accumulate: <u>5,000 kg (11,000 lb) or more</u> of any combination of UW accumulated (at any one time)</b>  <div style="display: flex; justify-content: space-between;"> <span>Accumulates: <input type="checkbox"/> a. UW Batteries</span> <span><input type="checkbox"/> b. Pesticides</span> <span><input type="checkbox"/> c. Pharmaceuticals</span> </div> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> d. Mercury Containing Devices</span> <span><input type="checkbox"/> e. Mercury Containing Lamps</span> </div> <input type="checkbox"/> <b>Destination Facility for UW</b> Note: For this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.	
<b>B. Florida Universal Pharmaceutical Waste (UPW): one-time registration</b>		
<input type="checkbox"/> Pharmaceuticals <b>LQH</b> = 5,000 kg or more of Universal Pharmaceutical Waste (UPW) accumulated (at any one time) <input checked="" type="checkbox"/> Pharmaceuticals <b>Acute LQH</b> = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste (UPW) accumulated <input checked="" type="checkbox"/> <b>Reverse Distributor</b> of Universal Pharmaceutical Waste (UPW) (must be registered with the Florida Department of Health [DOH])		
<b>C. Florida Annual Mercury Handler Registration:</b>		
<p><b>For-hire transporters, transfer facilities, handlers, reclamation and recovery facilities of Mercury-Containing Lamps and Devices operating in the State of Florida are required to register annually with the Department using this section of the form [Chapter 62-737, F.A.C.]. A one-time fee of \$1,000 is required for first time registration as a Large Quantity for-hire Handler of Mercury-Containing Lamps and Devices as detailed in 62-737.400(3)(a)3. (please contact FDEP first).</b></p> <p><b>If you <u>only</u> generate lamps and/or devices or manage pharmaceuticals, do not register or complete the information below.</b></p>		
<p><b>(1) This form is being submitted as a Florida Registration of Universal Waste Transporter/Handler for-hire Activities</b></p> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> First time registering             <input checked="" type="checkbox"/> Renewal             <input type="checkbox"/> One-time \$1,000 fee for Mercury for-hire first time LQH registration is attached           </div>		
<input checked="" type="checkbox"/> For-hire <b>Transporter</b> of Universal Waste Mercury-Containing Lamps or Devices <input checked="" type="checkbox"/> For-hire <b>Transfer Facility</b> of Universal Waste Mercury-Containing Lamps or Devices <input checked="" type="checkbox"/> Mercury-Containing Devices (thermostats, etc) <b>SQH</b> = less than 100 kg accumulated by for-hire handler <input checked="" type="checkbox"/> Mercury-Containing Lamps <b>SQH</b> = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler	Annual Registration Required	
<input type="checkbox"/> Mercury-Containing Devices <b>LQH</b> = 100 kg (220 lb) or more accumulated at any one time by for-hire handler <input type="checkbox"/> Mercury-Containing Lamps <b>LQH</b> = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler	Annual Registration + one-time \$1,000 fee+ More Requirements (contact FDEP)	
<p><b>(2) Mercury Recovery and/or Reclamation Facility</b> (A <u>hazardous waste permit</u> is required for this activity)</p> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> First time registering             <input type="checkbox"/> Renewal           </div>		Annual Registration Required
<p>Briefly Describe your Universal Waste Activities: <span style="float: right;"><input type="checkbox"/> We use Drum Top Bulb Crusher(s).</span></p> <p><b>Hazardous waste TSDF. Material is collected from the generator, received at the facility, then sent off-site for recycling.</b></p>		
<p><b>13. Other State Regulated Waste Activities:</b> Petroleum Contact Water (PCW) <input type="checkbox"/> Recovery <input type="checkbox"/> Transport [62-740 F.A.C.]</p> <p style="font-size: small;">Note: A water facility permit may be required for this activity. An annual report is required for a recovery facility pursuant to Rule [62-740.300(5)]</p>		

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. Effective Date April 23,2013 Page 3 of 5



<b>Hazardous Waste and Used Oil Transporter Registrations</b>		EPA ID No. <b>FLD981932494</b>												
<b>14. HW Transporter Activities: (Mark 'X' and complete all that apply if you need to register your HW Transporter activities)</b>														
<p><b>Transporters of and Transfer Facilities for Hazardous Waste in the State of Florida are required to register and annually renew their registration.</b> Evidence of casualty/liability insurance pursuant to 62-730.170(2)(a) is required in addition to this registration. Transfer facilities must submit several additional documents as detailed on page 5 the first time they register and when the information changes. Registered transporters and transfer facilities may only begin operations after receiving approval from the Department. <b>Generators of hazardous waste who transport waste only within the boundaries of their facility should not register.</b></p>														
<p><b>A. HW Transporter Registration Information (must be completed annually and when this information changes)</b></p> <p><b>This facility is a registered transporter of hazardous waste.</b></p> <p>This form is: <input type="checkbox"/> Initial Registration <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Notification of changes <input type="checkbox"/> Cancel Registration</p> <p><input type="checkbox"/> 1. For own waste only <input type="checkbox"/> 2. For commercial purposes <input type="checkbox"/> 3. Both commercial and own waste</p> <p>4. Transportation Mode <input type="checkbox"/> Air <input type="checkbox"/> Rail <input checked="" type="checkbox"/> Highway <input type="checkbox"/> Water <input type="checkbox"/> Other - specify _____</p>														
<p><b>B. HW Transfer Facility Registration Information (must be completed annually and when this information changes)</b></p> <p><input checked="" type="checkbox"/> <b>This facility is a Hazardous Waste Transfer Facility: (at this location)</b> Storage Volume _____</p> <p>This form is: <input type="checkbox"/> Initial Registration <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Notification of changes <input type="checkbox"/> Cancel Registration</p> <p><b>Note: Hazardous Waste transfer facilities must comply with the requirements of Rule 62-730.171, F.A.C., and Rule 62-730.182, F.A.C.</b></p> <p><b>The Transfer Facility records required under the provisions of Rule 62-730.171(6) , F.A.C., are kept at (check one):</b></p> <p><input type="checkbox"/> Our mailing (business) address <input checked="" type="checkbox"/> The site (facility) address</p> <p>Please enter the EPA ID Number of the HW Transporter who carries the insurance for this Transfer Facility: <table border="1" style="display: inline-table; text-align: center; width: 150px;"> <tr> <td>F</td><td>L</td><td>D</td><td>9</td><td>8</td><td>1</td><td>9</td><td>3</td><td>2</td><td>4</td><td>9</td><td>4</td> </tr> </table></p> <p><b>Please see the top of page 5 for additional items that must be submitted in addition to the above registration for Hazardous Waste Transfer Facilities [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)];</b></p>			F	L	D	9	8	1	9	3	2	4	9	4
F	L	D	9	8	1	9	3	2	4	9	4			
<b>15. Used Oil and Oil Filter Activities: : (Mark 'X' and complete all that apply if you need to register your used oil activities),</b>														
<p><b>Transporters (exemptions in 40 CFR 279.40(a)(1-4) , transfer facilities, processors, off-specification burners, and/or marketers <u>must annually register</u> with the Department using this form. All except Florida used oil (UO) Processors and collection centers must pay an annual \$100 registration fee.</b></p> <p>This form is: <input type="checkbox"/> Initial Registration <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Notification of changes <input type="checkbox"/> Cancel Registration</p> <p><input checked="" type="checkbox"/> If applicable, a check or money order, in the amount of \$100, payable to Florida Department of Environmental Protection is enclosed.</p>														
<p>(1) Used Oil Transporter - mark activities: (occurring in Florida)</p> <p><input checked="" type="checkbox"/> a. Transporter (off-site) and noncontiguous locations</p> <p><input checked="" type="checkbox"/> b. Transfer Facility</p> <p>(2) <input type="checkbox"/> Collection Center (From businesses, <u>no more than 55 gal</u> per shipment)</p> <p>(3) <input type="checkbox"/> Used Oil Processor (A permit is required.)</p> <p>(4) <input type="checkbox"/> Off-Specification Used Oil Burner</p> <p>(5) Used Oil Fuel Marketer <input type="checkbox"/> On-Spec <input type="checkbox"/> Off-Spec</p>	<p>(6) Used Oil Filter Management (must annually register)</p> <p><input checked="" type="checkbox"/> a. Transporter</p> <p><input checked="" type="checkbox"/> b. Transfer Facility</p> <p><input type="checkbox"/> c. Processor (Annual Report Required )</p> <p><input type="checkbox"/> d. End User</p> <p>(7) The records required under the provisions of Rule 62-710.510, FAC, are kept at (check one):</p> <p><input type="checkbox"/> Our mailing (business) address <input checked="" type="checkbox"/> The site (facility) address</p>													
<p><b>Please see the top of page 5 for additional items that must be submitted in addition to the above registration and fees required for non-exempt Used Oil Transporters.</b></p>														

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2 , F.A.C. Effective Date April 23,2013 Page 4 of 5

<b>Transfer Facility and Used Oil Transporter requirements and required signature page</b>		<b>EPA ID No. FLD981932494</b>	
<p><b>(14 cont.) Hazardous Waste Transfer Facilities:</b> In addition to the registration required for Transfer Facilities on Page 4, Section 14, the following items are required to be submitted with the initial notification for a transfer facility and any changed items must be submitted with any subsequent submission [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:</p> <p>___ Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]</p> <p>___ Evidence of the transporter's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]</p> <p>___ A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]</p> <p>___ A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]</p> <p>___ A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]</p> <p>___ A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]</p>			
<p><b>(15 cont.) Used Oil Transporters: (Exemptions in 40 CFR 279.40(a)(1-4))</b></p> <p>In addition to the requirements on Page 4 Section 15:</p> <ul style="list-style-type: none"> <li>• ALL registered UO Handlers must submit an annual report except generators transporting UO from noncontiguous operations within their own company.</li> <li>• UO transporters transporting off-site over public highways only within their own company must submit proof of insurance.</li> <li>• UO transporters transporting more than 500 gallons/year must submit proof of insurance annually, and must sign and certify this submission as a certified used oil transporter in section 17 (except those exempted by Rule 62-710.600(1), F.A.C.):</li> </ul> <p><input type="checkbox"/> The used oil annual report is attached      <input type="checkbox"/> Evidence of Liability Insurance pursuant to 62-710.600(2)(e), F.A.C. is attached.</p>			
<p><b>16. Comments (attach a page if more space is needed):</b></p> <p>See Attachment 1 for additional EPA Waste Codes.</p>			
<p><b>17. Certification:</b> 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 gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>			
<p><input checked="" type="checkbox"/> I certify as a <b>Used Oil Transporter</b> that I am familiar with the applicable Florida and Federal laws and rules governing used oil transportation and have an annual and new employee training program in place covering the applicable used oil rules. Evidence of financial responsibility is demonstrated by the Used Oil Transporter Certificate of Liability Insurance, DEP form 62-730.900(5)(a), F.A.C..</p>			
<p><b>Signature of owner, operator, or an authorized representative</b></p> 	<p><b>Print Name and Title</b></p> <p style="text-align: center;">Stuart Stapleton</p>	<p><b>Used Oil</b></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><b>Date Signed (mm-dd-yyyy)</b></p> <p>05/13/2016</p>
<p><b>If the person that filled in this form is not the Facility Contact or Operator, please complete the information below:</b></p>			
(Name of person completing this form)	(Phone Number)	(E-mail Address)	

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. Effective Date April 23, 2013 Page 5 of 5



## PERMITTED HAZARDOUS WASTE CODES

EQ Florida

### CHARACTERISTIC WASTE

D001	D002	D003	D004	D005	D006	D007	D008	D009	D010	D011	D012	D013	D014	D015	D016	D017	D018
D019	D020	D021	D022	D023	D024	D025	D026	D027	D028	D029	D030	D031	D032	D033	D034	D035	D036
D037	D038	D039	D040	D041	D042	D043											

### HAZARDOUS WASTE FROM NON-SPECIFIC SOURCES

F001	F002	F003	F004	F005	F006	F007	F008	F009	F010	F011	F012	F019	F020	F021	F022	F023	F024
F025	F026	F027	F028	F032	F034	F035	F037	F038	F039								

### HAZARDOUS WASTE FROM SPECIFIC SOURCES

K001	K002	K003	K004	K005	K006	K007	K008	K009	K010	K011	K013	K014	K015	K016	K017	K018	K019
K020	K021	K022	K023	K024	K025	K026	K027	K028	K029	K030	K031	K032	K033	K034	K035	K036	K037
K038	K039	K040	K041	K042	K043	K044	K045	K046	K047	K048	K049	K050	K051	K052	K060	K061	K062
K069	K071	K073	K083	K084	K085	K086	K087	K088	K093	K094	K095	K096	K097	K098	K099	K100	K101
K102	K103	K104	K105	K106	K107	K108	K109	K110	K111	K112	K113	K114	K115	K116	K117	K118	K123
K124	K125	K126	K131	K132	K136	K141	K142	K143	K144	K145	K147	K148	K149	K150	K151	K161	

### DISCARDED COMMERCIAL CHEMICAL PRODUCTS, OFF-SPECIFICATION SPECIES, CONTAINER RESIDUES AND SPILL RESIDUES THEREOF

P001	P002	P003	P004	P005	P006	P007	P008	P009	P010	P011	P012	P013	P014	P015	P016	P017	P018
P020	P021	P022	P023	P024	P026	P027	P028	P029	P030	P031	P033	P034	P036	P037	P038	P039	P040
P041	P042	P043	P044	P045	P046	P047	P048	P049	P050	P051	P054	P056	P057	P058	P059	P060	P062
P063	P064	P065	P066	P067	P068	P069	P070	P071	P072	P073	P074	P075	P076	P077	P078	P081	P082
P084	P085	P087	P088	P089	P092	P093	P094	P095	P096	P097	P098	P099	P101	P102	P103	P104	P105
P106	P108	P109	P110	P111	P112	P113	P114	P115	P116	P118	P119	P120	P121	P122	P123	P127	P128
P185	P188	P189	P190	P191	P192	P194	P196	P197	P198	P199	P201	P202	P203	P204	P205		
U001	U002	U003	U004	U005	U006	U007	U008	U009	U010	U011	U012	U014	U015	U016	U017	U018	U019
U020	U021	U022	U023	U024	U025	U026	U027	U028	U029	U030	U031	U032	U033	U034	U035	U036	U037
U038	U039	U041	U042	U043	U044	U045	U046	U047	U048	U049	U050	U051	U052	U053	U055	U056	U057
U058	U059	U060	U061	U062	U063	U064	U066	U067	U068	U069	U070	U071	U072	U073	U074	U075	U076
U077	U078	U079	U080	U081	U082	U083	U084	U085	U086	U087	U088	U089	U090	U091	U092	U093	U094
U095	U096	U097	U098	U099	U101	U102	U103	U105	U106	U107	U108	U109	U110	U111	U112	U113	U114
U115	U116	U117	U118	U119	U120	U121	U122	U123	U124	U125	U126	U127	U128	U129	U130	U131	U132
U133	U134	U135	U136	U137	U138	U140	U141	U142	U143	U144	U145	U146	U147	U148	U149	U150	U151
U152	U153	U154	U155	U156	U157	U158	U159	U160	U161	U162	U163	U164	U165	U166	U167	U168	U169
U170	U171	U172	U173	U174	U176	U177	U178	U179	U180	U181	U182	U183	U184	U185	U186	U187	U188
U189	U190	U191	U192	U193	U194	U196	U197	U200	U201	U203	U204	U205	U206	U207	U208	U209	U210
U211	U213	U214	U215	U216	U217	U218	U219	U220	U221	U222	U223	U225	U226	U227	U228	U234	U235
U236	U237	U238	U239	U240	U243	U244	U246	U247	U248	U249	U271	U278	U279	U280	U328	U353	U359
U364	U367	U372	U373	U387	U389	U394	U395	U404	U409	U410	U411						



251 E. Front St., Suite 400, Boise, ID. 83702  
P 800.590.5220 • 208.331.7900

March 16, 2015

**Subject: Delegation of Signing Authority**

To whom it may concern:

As a Responsible Corporate Officer of EQ Florida, Inc., I due hereby delegate to the Director of Operations, General Manager or Facility Manager with day-to-day operational authority of the respective company's facility, the authority of signing letters, reports, applications and forms or other required documents requested or required by governmental agencies on behalf of EQ Florida, Inc.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Bell'.

Simon Bell  
Executive Vice President  
Operations and Environmental Services

A large, thick, black swoosh graphic that starts on the left and curves upwards and to the right, ending under the text.

Unequaled service. Solutions you can trust.  
**USecology.com**

May 13, 2016

## 2.0 GENERAL FACILITY INFORMATION

### 2.1 Permit Modification Overview

This submittal is intended to modify only the existing hazardous waste operating permit (No. 34875/HO/011) for the EQ Florida, Inc. (EQ) facility (**Figure 1**) located at 7202 East 8th Avenue, Tampa, Hillsborough County, FL 33619. An updated Boundary Survey (**Figure 6**) and Existing and Proposed Facility Layout (**Figure 7**) present surveyed, to-scale plans of the facility's processing, storage and office buildings, parking lots, retention ponds and adjoining and adjacent streets and offsite parcels.

This application proposes the following changes to the current Resource Conservation and Recovery Act (RCRA) Hazardous and Solid Waste Amendment (HSWA) Operating Permit, No. 34875/HO/011, finalized on April 1, 2014, including the:

1. Addition of 'listed' Waste Code K062, to the list of hazardous wastes codes (D002 and D004 thru D011) that are currently permitted for treatment within the WPB. K062 is the waste code for 'spent pickle liquor' from steel finishing operations. EPA's Office of Solid Waste (OSW) defines "steel finishing operations" as processes which impart desired mechanical and surface characteristics to steel.
2. Addition of 4,400 gallons of hazardous waste (waste codes D002, D004 thru D011, and K062) storage in the Waste Processing Building (WPB). The additional proposed chemical storage in the WPB will include containers of 'characteristic' hazardous waste received by EQ as solids, liquids, and sludges. The waste materials will be stored in the proposed designated storage area (See Inset, **Figure 7**) awaiting treatment by 'stabilization' in the hazardous waste treatment tank. Modeling shall be undertaken for risk of offsite consequences as per Florida Statutes (F.S.) 403.7211 – *Hazardous Waste Facilities managing hazardous wastes generated offsite* (Section 14). The WPB is designated as Solid Waste Management Unit (SWMU) 7.
3. Addition of 800 cubic yards (CY), or a maximum of forty (40) 20-CY roll-off boxes, of post-treated (via stabilization) and solidified formerly 'characteristic and/or listed' hazardous waste material storage within the footprint of the asphalt-covered parking lot located on the south side of E. 9<sup>th</sup> Avenue within the proposed Bulk Container Storage Areas (BCSAs) illustrated on **Figure 7**. The treated material will be placed in roll-offs and positioned inside of the four (proposed) designated and permitted BCSAs only after EQ has confirmed that no free liquids exist within each given 'batch' of material being treated within the hazardous waste treatment tank by administering one (1) 'paint filter test' per batch (See Method 9095a, Appendix J, Volume 2 of 3, and the Waste Analysis Plan (WAP), Section 4.0). Sampling protocols for paint filter tests and subsequent 'toxicity characteristic leaching procedure' (TCLP) analyses are provided in the WAP in Section 4.0. The proposed storage area meets the 40 CFR 264.175(c) containment system requirements for the storage of containers holding wastes that do not contain free liquids. As a further safeguard, a "cracks and gaps identification and repair program" (SOP QES-OP-006-FLA, Appendix J, Volume 2 of 3) will ensure that the asphalt parking lot surface remains sufficiently impervious. In addition, the parking lot is sloped in a manner that drains precipitation away from the storage area and stored bulk containers; the bottom of the bulk containers are elevated 6 -8 inches above the ground which protects the bottom of the container from contact with accumulated liquids. The 20-CY roll-off boxes are designed for hazardous waste transportation and are DOT-approved. All proposed storage within the BCSAs shall be managed, permitted and financially assured as hazardous waste until receipt of laboratory analytical confirmation declares the waste as 'non-hazardous and no longer characteristic'. In addition, non-hazardous waste may be stored within the BCSAs (provided

the 800 CY maximum capacity is not exceeded) and will not be counted toward the facility's daily hazardous waste capacity provided that proper labeling procedures have been undertaken (Section 12). The BCSAs are designated as SWMUs 20a through 20d, as illustrated on **Figure 17**.

4. Deletion of the currently permitted (April 1, 2014) but not yet installed 6,000-gallon oil-water separator (SWMU 19) which was to be constructed outside and along the northeast corner of the WPB. EQ requests the deletion of this unit from the permit due to changes in market conditions since April 2014, and no longer intends to construct an oil-water separator.
5. Clarification regarding the operations within the 10-day Transfer Facility. Explanations within Paragraphs 15, 18 and 19 of the current permit pages 19 & 20 of 47 remain unclear.
6. Clarification that the permitted hazardous waste capacity for the Inbound/Outbound (I/O) Staging Area co-located on the E. 8<sup>th</sup> Avenue property within the footprint of the 10-day Transfer Area (SWMU 11) is included as part of the total allowable 50,000 gallons as permitted for storage in the CSB and ISCA. Explanations within the current permit, Paragraphs 15, 18 and 19, pages 19 & 20 of 47 remain unclear.
7. Hazardous debris, as described in 40 CFR 268.45, will no longer be treated in the hazardous waste treatment tank. Permit language discussing the treatment of hazardous debris has been removed from the application.

**TOTAL EXISTING & PROPOSED HAZARDOUS WASTE STORAGE CAPACITIES**

<b>Building/Storage Area</b>	<b>Existing or Proposed</b>	<b>Location at Facility</b>	<b>SWMU</b>	<b>Capacity</b>
CSB & ISCA & I/O <sup>1</sup>	Existing	2002 N. Orient Road, North of E. 9 <sup>th</sup> Avenue & 7202 E. 8 <sup>th</sup> Avenue, Parking Lot, West of Office Building	1, 2, 8, 11	50,000 gallons
WPB <sup>2</sup>	Proposed	7202 E. 8 <sup>th</sup> Avenue, West of Office Building	7	4,400 gallons
10-day Transfer Area	Existing	7202 E. 8 <sup>th</sup> Avenue, Parking Lot, West of Office Building	11	20,000 gallons or 100 CY
BCSAs <sup>3</sup>	Proposed	Parking Lot, South of E. 9 <sup>th</sup> Avenue, North and West of Office Building	20a-20d	800 CY
<b>Total Existing &amp; Proposed Hazardous Waste Storage Capacity:</b>				<b>74,400 gallons + 800 CY</b>

**NOTES:**

- 1 – Container Storage Building, Improved Secondary Containment Area and Inbound/Outbound Staging Area
- 2 – Waste Processing Building
- 3 – Bulk Container Storage Areas

The facility General Information, Inspection Plan, Contingency Plan, Procedures, Training Program, WAP, Container Management, Closure Plan, Risk/Offsite Exposure Analysis and other sections have been updated as part of this modification application and revised to reflect regulatory changes and more detailed and accurate conditions.

**2.2 Facility Details and Background**

EQ, formerly known as US Liquids Inc., is a division of EQ Holding Company, a Michigan Corporation, and a wholly-owned subsidiary of US Ecology.

ID No.:	FLD 981 932 494
Current HSWA Permit #:	34875/HO/011
Pending HSWA Permit #:	34875/HO/012
Name:	EQ Florida Inc.
Facility Address:	7202 East 8 <sup>th</sup> Avenue, Tampa, FL 33619
Telephone #:	(813) 623-5302
County:	Hillsborough

The EQ facility is a permitted non-hazardous and hazardous waste storage and treatment facility and a registered hazardous waste transporter with a State-registered (on-site) transfer facility. No on-site disposal occurs at the EQ facility. EQ manages non-RCRA regulated waste, household hazardous waste, used oil



and filters, mercury containing lamps and devices, TSCA-exempt and limited quantity exempt PCB and asbestos wastes, recyclable materials, and other similar substances, materials, and wastes. The primary waste management operations are: storage, consolidation and transfer of hazardous wastes, and treatment of hazardous wastes (D002, D004-D011, and (proposed) K062). The main office and mailing address is listed as 7202 E. 8<sup>th</sup> Avenue; the majority of inbound wastes are delivered to the Container Storage Building (CSB) located at 2002 N. Orient Road. The I/O Staging Area is co-located with the 10-day Transfer Area on the E. 8<sup>th</sup> Avenue property and used for incoming loads of hazardous waste awaiting receipt and unloading, and for full loads awaiting transportation to an offsite disposal and/or recycling facility.

An aerial photograph of the site is included as **Figure 2**, and a topographic map at a scale of 1 inch to 2,000 feet is included as **Figure 4**. Facility and hazardous waste management building as-built record drawings are included in Appendix D (of Volume 2 of 3).

The facility is located outside the 100-year flood plain. A Federal Emergency Management Agency (FEMA) map indicating this fact is included as **Figure 5**. A boundary survey drawing is provided as Figure 6 and a facility layout plan is provided as **Figure 7**.

The land was previously undeveloped and no solid waste management units (SWMUs) were located on the site. The SWMUs currently identified on site are described in the SWMU section. The surrounding land uses are heavy industrial. These include two National Priority List (NPL) (Superfund) sites, metals recyclers, a construction debris transfer facility, steel cleaning and coating, fishery, gas manufacturing, pesticide formulator, and bail bonds businesses.

The surrounding land use is shown on **Figure 8**. The facility is located in the city of Tampa in a heavy industrial zoned area known as Orient Park. The area zoning is shown on **Figure 3**. The City of Tampa classifies this area as suitable for hazardous waste facilities. The West Florida 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.

The EQ facility (**Figures 1 through 6**) comprises 4.46 acres, more or less (MOL), with processing, storage, transportation and administrative operations conducted on two separate but adjacent/contiguous parcels located north and south, respectively, of East 9<sup>th</sup> Avenue, Tampa, Florida.

The northern parcel (**Figures 13 and 14**) consists of the 5,866 square foot (ft<sup>2</sup>), totally enclosed (CSB, with a “covered processing area” and “staging area” to the west and a retention pond to the east and adjacent to Orient Road. The CSB is utilized for the container storage of hazardous waste, and has three bays [Bay 1 (A & B), Bay 2, and Bay 3 (A & B)]. Within the Covered Processing Area is the “Improved Secondary Containment Area” (ISCA) discussed in Section 2.3 below. Also located on the northern parcel is a small, one-story modular office building where receiving is done.

The southern parcel (**Figures 6, 7 and 15**) consists of a two-story office building with a small laboratory and (**Figure 7**) and adjoining Solid Waste Operations Area, asphalt parking areas, retention ponds and an 8,050 square foot covered, open-sided Waste Processing Building (WPB) that houses the on-ground solid waste solidification tank; shredder; non-hazardous waste storage (drums and containers); on-ground hazardous waste treatment tank; temporary staging area for hazardous waste chemicals (maximum of 80 drums), future proposed permitted storage; and a reactive(s) magazine.

A RCRA Facility Assessment (RFA) of the EQ facility was initiated on February 15, 1993. An RFA Addendum was prepared by FDEP on May 13, 2011. To date, there have been no releases to the environment of hazardous waste or hazardous waste constituents for any EQ SWMU. Refer to **Figure 17**

and Appendix G (Volume 2 of 3) for further information regarding historical (SWMUs 1 through 19) and more recent SWMUs (SWMU 20a through 20d) at this facility.

## **2.3 Facility Layout and Operations**

Below is a detailed explanation of the various hazardous waste operations which occur within the defined buildings and existing (and proposed) permitted storage areas across the EQ facility (**Figures 15 and 16**).

### **2.3.1 Container Storage Building (CSB) and Improved Secondary Containment Area (ISCA) – Northern Parcel, 2002 N. Orient Road – 50,000 gallons Total Capacity**

The CSB (**Figure 14**) was built in accordance with the Florida Fire Prevention Code and is composed of three separate bays. The bays are separated by an eight-inch wide concrete block wall and 4-hour fire rated doors. The concrete block wall extends from the floor to the roof and has been designed with a minimum fire-resistance-rating of four hours. Bays 1 and 3 are used for storage of all of the permitted hazardous waste codes (Volume 2 of 3, Appendix B). Bay 2 is used for the storage of ignitables, reactives and cyanides only.

All solid and hazardous waste is received at the CSB before further processing and/or storage. The CSB (and adjoining ISCA) has a total permitted hazardous waste capacity of 50,000 gallons. Of that 50,000 gallons, a maximum of 20,000 gallons each is permitted for Bays 1 and 3, and a maximum of 10,000 gallons is permitted for Bay 2.

The ISCA is located in the loading/unloading area within the Container Processing Area west of the CSB on the west-side of Bays 2 and 3A, and is constructed with two concrete containment walls. The ISCA also has a permitted total allowable capacity of 10,000 gallons, however this 10,000 gallon capacity falls within the total CSB allowable capacity of 50,000 gallons; so, at no time, shall the CSB and ISCA hazardous waste capacities combined exceed the 50,000 gallon total permitted storage amount as per the confines of the permit. This 50,000 gallon total capacity amount is known to be consistent with the physical limitations of the CSB and adjacent ISCA. Actual day-to-day volume is usually less than 25,000 gallons/day. The ISCA was constructed in order to provide secondary containment for the following operations:

- 1) **Recontainerization/Over-Packing.** Some of the waste received at the CSB will be recontainerized or over-packed from one container to another. In general, recontainerization includes consolidation of like waste into similar sized or larger containers. Wastes are transferred between containers by pumping (using a portable pump) or pouring directly from one container to another. All container transfer operations take place either within the CSB or the ISCA. Other recontainerization operations will include drum crushing and rag compacting (**Figures 14 & 17**, SWMU 18), loading to roll-offs, and loading to tanker truck. Loading to roll-offs and tanker trucks only takes place within the ISCA.
- 2) **Paint Can Crushing.** The facility receives water-based latex and solvent-based paint in containers up to 5-gallons for re-containerization and disposal. The majority of the paint received is from household waste. This operation will include opening the container, crushing the paint can, collecting the paint waste, collecting the empty containers and containerizing the paint for transport off-site. This operation will take place within the permitted ISCA processing area identified on **Figures 14 and 17** (SWMU 9).

All waste transfer and re-containerization is conducted utilizing “best management practices” (BMP). Hazardous wastes have already been profiled and approved as described in the EQ Waste Analysis Plan (WAP) included as Section 4. Each hazardous waste stream has been sampled and quality control verified as described in the EQ WAP. Only compatible wastes are transferred or re-containerized in each batch operation. The same waste management practices for inspections, contingency, preparedness and prevention, training, precautions for ignitable, reactive, and incompatible wastes, waste analysis, record keeping, and container management that apply for treatment and storage will also apply for waste transfer and re-containerization.

EQ will utilize the container arrangement shown on **Figure 14**. The containers will normally be stored in a "single-stacked" arrangement, although small containers (such as 5-gallon pails) may be manually stacked on top of the "single stacked" containers. EQ will occasionally utilize a double-stack container arrangement. Pallet jacks are used in the CSB due to the fact that they are smaller and easier to navigate than forklifts and more efficient, given the lack of room to maneuver within the CSB. Manual Pallet Jacks can be used in the ignitables/reactives/cyanides bay (Bay 2).

### **2.3.2 Inbound & Outbound (I/O) Staging Area – Southern Parcel, 7202 E. 8<sup>th</sup> Avenue – Shares 50,000 gallons Total Capacity with CSB/ISCA**

The I/O Area (SWMU 11) is only used for inbound loads waiting for unloading and receipt and outbound loads waiting for completed transportation paperwork. Vehicles/trailers in this area are marked as either an inbound load or an outbound load to avoid being confused with other vehicles/trailers that may also be located in the same vicinity. The inbound identification tags are clearly visible and include the vehicle/trailer number, manifest document number, trip number (if applicable), receipt date, container count and total gallons. The outbound identification tags are also clearly visible and include the trailer number, manifest document number, start date, destination, container count and total gallons. EQ may be either the generator or the designated facility.

### **2.3.3 The 10-Day Transfer Facility – Southern Parcel, 7202 E. 8<sup>th</sup> Avenue – 20,000 gallons or 100 CY**

The 10-Day Transfer Facility (SWMU 11) is used to store manifested hazardous waste on site for no longer than ten (10) days as allowed for transfer facilities. It will not be utilized for any waste where EQ is the designated facility on the manifest or originated at the facility where EQ is listed as the generator. Vehicles and trailers parked in this area are marked as a 10-Day vehicle/trailer to avoid being confused with other vehicles/trailers that may also be located in the same vicinity. The 10-day identification tags are clearly visible and include the vehicle/trailer number, manifest document number, start date, destination, container count and total gallons. Transfer facility (**Figure 16**) waste shipments are noted in a separate Transfer Log (operating record).

### **2.3.4 Waste Processing Building (WPB) – Southern Parcel, 7202 E. 8<sup>th</sup> Avenue – 4,400 gallons**

The 8,050 square foot covered WPB (**Figure 15**) has a proposed hazardous waste storage capacity of 4,400 gallons. The capacity is consistent with the physical limitations of the WPB.

The WPB (SWMU 7) includes the following units/storage areas:

- 1) A non-hazardous drum storage area.

- 2) A permitted Reactives Storage Container Unit – used for the temporary storage of reactives only. See Section 2.3.7 for additional details. The total capacity of the magazine is 575 gallons which is included within the 4,400-gallon total capacity of the WPB.
- 3) A shredder – used for the shredding of non-hazardous materials.
- 4) A non-hazardous waste solidification unit.
- 5) A permitted hazardous waste treatment unit.
- 6) A proposed 4,400 gallon hazardous waste storage area -- Containers that will be placed in the proposed storage area will primarily consist of 55-gallon drums, although waste may also be received in 250-gallon and 275-gallon totes. EQ will normally store containers in a "single-stacked" arrangement but may occasionally utilize a double-stack container arrangement. Rows of containers will be separated by a 2-foot aisle space which will allow for container inspection, response to and management of leaks, and the movement of containers.

In order to separate the hazardous waste operations from the solid waste operations, a 12-in wide bright yellow line will be painted between the two access ramps on the east and west sides of the treatment building and separating the north from the south sides. A similar bright line will be painted around the reactives magazine.

### **2.3.5 Bulk Container Storage Areas (BCSAs) – Southern Parcel, 7202 E. 8<sup>th</sup> Avenue – 800 CY**

The BCSAs (SWMU 20a through 20d) are for hazardous waste that has been treated in the hazardous waste treatment tank, sampled for confirmatory analysis, is a solid (passes the paint filter test), and has been removed from the treatment tank. Until confirmatory analysis is received from a certified off-site laboratory, the waste will be considered hazardous waste. When the treated waste's confirmatory analysis is received, and the analytical results indicate that the waste has been successfully treated and meets all de-characterization and LDR treatment standards, the waste will be considered non-RCRA waste. The asphalt parking lot area (**Figure 16**) where the BSCAs will be located is sloped (**Figure 13**) and drains precipitation away from the storage area and the stored bulk containers. The bottom of the bulk containers are elevated 6 -8 inches above the ground, and are protected from contact with any liquids (precipitation, stormwater runoff) that may accumulate.

While EQ believes that the roll-off boxes containing confirmed solids will not leak, in the event that leakage is identified/observed, the area will be immediately contained and cleaned up in accordance with the SOP (SOP # OPS-OP-071-FLA) contained in Appendix J of Volume 2 of 3 of this permit application.

- 1) Re-containerization/Over-Packing. Some of the waste received at the WPB will be re-containerized or over-packed from one container to another. In general, re-containerization includes consolidation of like waste into similar sized or larger containers. Wastes are transferred between containers by pumping (using a portable pump) or pouring directly from one container to another.
- 2) Clean, RCRA-empty roll-offs are positioned on the south side of the WPB in close proximity to the Hazardous Waste Treatment Tank, loaded with treated material, and then moved onto a roll-off truck which then re-locates the roll-off box into one of the four (proposed) permitted BCSAs.

## **2.4 Operations Description - Overview**

The hazardous waste operations at the EQ facility consist of the proposed treatment of the listed waste code K062 and selected characteristically hazardous wastes (Waste Codes D002, D004 thru D011) and storage of hazardous waste in containers, primarily 55-gallon drums, although waste may also be received in 250-gallon and 275-gallon totes. A minimum of 10 percent of each hazardous waste stream entering the facility is sampled. Some waste is re-containerized or consolidated in other containers. Re-containerization operations may also include use of the following equipment: paint can crusher, drum crusher, and rag compactor. Wastes not treated on site are shipped offsite for final disposal and/or recycling.

Hazardous wastes treated in the on-ground treatment tank that meet the Land Disposal Restrictions (LDR), contain no free liquids (as determined by EPA SW-846 Method 9095B [i.e., Paint Filter Test (PFT)]) and no longer exhibit hazardous waste characteristics (i.e., have been de-characterized) based on TCLP test results will be loaded into roll-off boxes or dump trailers for subsequent off-site disposal at an approved disposal facility.

### **2.4.1 Waste Received**

All solid and hazardous waste is received at the CSB before further processing and/or storage. Waste may be received at the facility in any size container up to 275-gallon totes. Waste is also received in other DOT.-approved containers including bulk shipments. Drums and other portable containers are off-loaded into the CSB. Bulk shipments are stored in the ISCA located on the loading dock in front of Bay 2. Received containers are moved, categorized and stored according to waste type. The following waste type categories are handled at the facility:

1. Ignitable Waste (I)
2. Corrosive Waste (C)
3. Reactive Waste (R)
4. Toxicity Characteristic Waste (E)
5. Acute Hazardous Waste (H)
6. Toxic Waste (T)
7. Non-RCRA Regulated Waste

No forbidden explosives as defined in 40 CFR 261.23(a)(8), regulated radioactive, or regulated biohazardous waste will be managed at the EQ facility.

Waste types include liquids, solids, sludges, and a variety of lab packs (waste which is packaged in its original container).

### **2.4.2 Recontainerization**

Some of the waste received will be re-containerized or over packed from one container to another. In general, re-containerization includes consolidation of like waste into similar sized or larger containers. Wastes are transferred between containers by pumping (using a portable pump) or pouring directly from one container to another. All container transfer operations take place either within the Container Storage Building or the Waste Processing Building, except for the paint can crushing and the drum crusher/rag compactor operations.

Other re-containerization operations will include paint can crushing, drum crushing and rag compacting, loading to roll-offs, and loading to tanker truck. All waste transfer and re-

containerization is conducted utilizing best management practices. Hazardous wastes have already been profiled and approved as described in the EQ Waste Analysis Plan. Each hazardous waste stream has been sampled and quality control verified as described in the EQ Waste Analysis Plan. Only compatible wastes are transferred or re-containerized in each batch operation. The same waste management practices for inspections, contingency, preparedness and prevention, training, precautions for ignitable, reactive, and incompatible wastes, waste analysis, record keeping, and container management that apply for treatment and storage will also apply for waste transfer and re-containerization. Waste processing areas, to include re-containerization operations and paint can crushing locations, are identified on **Figure 16**.

EQ refers to the re-containerization and compatibility testing as “Consolidated Confirmatory Compatibility Testing” and the text in subsequent sections has been modified to reflect this clarification. The SOP that EQ has prepared for assuring compatibility during re-containerization is referred to as “Liquids Bulking” and is summarized in Appendix J (in Volume 2 of 3) with other applicable EQ SOPs pertinent to this hazardous waste renewal application.

#### **2.4.3 Paint Can Crushing**

The facility receives water-based latex and solvent-based paint in containers up to 5-gallons for re-containerization and disposal. The majority of the paint received is from household waste. This operation will include opening the container, crushing the paint can, collecting the paint waste, collecting the empty containers and containerizing the paint for transport off-site. This operation will take place within the permitted processing areas identified on **Figure 16**.

#### **2.4.4 Drum Crushing and Rag Compacting**

The drum crusher and rag compactor consists of a closed cabinet unit located on the ramp outside Bay 3. A drum is placed inside the unit and a ram is used to crush the drum. The unit contains a grate and collection pan at the bottom to catch any liquid or solid residue material from the crushed drum. The material is drummed as waste.

The rag compactor works in a similar manner in that a drum of waste rags is placed inside the unit. A ram, which is slightly smaller than the drum opening, is used to compact the rags inside the drum.

#### **2.4.5 Treatment of Characteristic and Listed (K062) Hazardous Wastes**

The goal of treating characteristic (D004-D011) and listed hazardous waste (K062) is to stabilize the material in a manner that the resulting mixture no longer exhibits the characteristics of hazardous waste and meets the Land Disposal Restrictions. Adding prescribed reagents to the waste raises the pH of the mixture to an optimal metals treatment range of 9 to 13. Once the mixture is at this optimum pH range, the toxicity of the hazardous components (RCRA metals) are reduced or eliminated by lowering their solubility and leaching ability. A solidifying reagent is added to the treated mixture in the final step of the treatment process and eliminates any free liquids that may remain after thorough mixing.

The hazardous waste treatment tank is a custom manufactured piece of equipment, essentially meeting the 40 CFR, Part 264.10 definition of an on-ground tank. The unit is constructed of steel plates that have been welded into the shape of a box. The box is 20-ft. wide by 20-ft. long and is 4-ft. 7-in tall. The floor of the tank is 3/4-in steel plate and the side walls of the tank are 1/2-in steel plate. The top of the box is open. The connections between the plates are joined together with

full penetration welded joints so that the box is liquid-tight and will not allow waste to escape. The treatment tank will also be anchored to the floor on the north, west and south sides. The design and installation of the on ground treatment tank complies with all the requirements specified in 40 CFR, Subpart J, and the design drawings and specifications for the treatment tank as well as the engineering certification of the design are provided in Appendix I (Volume 2 of 3).

The primary reagents used for treatment of the waste include hydrated lime/lime kiln dust, ferrous sulfate, sodium sulfide/sulfide flakes, and hypochlorite. The amount of reagent varies based on the waste stream but is generally a 5:1 ratio when absorbing liquids and 10:1 for solids (i.e., 1 ton of waste to 200 pounds of lime).

The waste selected for treatment is deposited directly into the top of the box by pumping pouring, etc. The pH is then adjusted and raised by adding treatment reagent to the waste until the optimal metals treatment range of 9 to 13 is reached. The material is mechanically mixed using a backhoe, portable mixer, or similar piece of equipment thoroughly to ensure that all of the material has been treated. A solidification agent is then added to the treated mixture which eliminates any free liquids that may remain. Once the material has completed the treatment and solidification process, a grab sample of the treated material is collected from the treatment tank for verification analysis by a NELAP accredited laboratory. The material is then removed from the treatment tank by an excavator or other similar piece of heavy equipment and placed into a lined, sealed, bulk container. The bulk container is then moved to the proposed Bulk Container Storage area pending analysis.

The grab sample is subjected to a TCLP test to assure compliance with the land disposal restrictions (LDRs) as well as running a Paint Filter Test (PFT) by Method 9095B to assure the absence of free liquids. Treated materials that are decharacterized, meet the LDRs and contain no free liquids are sent for disposal at an approved disposal facility (Subtitle D landfill). If the treated material fails the initial TCLP screening and is still characteristically hazardous or fails to meet LDRs or PFT, it will be re-treated until a TCLP, LDR and PFT tests have confirmed the material no longer retains the hazardous characteristics for the waste being treated. It should also be pointed out that the disposal facility accepting the treated material may require additional testing above and beyond a TCLP test before they will accept the waste. EQ will determine testing requirements for the proposed disposal facility and have the samples analyzed accordingly.

#### **2.4.6 Loading to Roll-Offs**

Re-containerization operations will include loading material to roll-off boxes and/or dump trailers for transport off-site. Roll-offs or dump trailers will be loaded in the loading/unloading area located outside the Container Storage Building. Loaded roll-offs or dump trailers will be manifested and shipped off-site for ultimate treatment and disposal.

Treated hazardous wastes that no longer exhibit hazardous waste characteristics, contain no free liquids, and meet the LDRs based on the TCLP grab sample test results, will be loaded into bulk containers. They will be subsequently manifested off-site for disposal at an approved disposal facility. Because solid waste and de-characterized hazardous waste containing no free liquids and meeting the LDRs may be stored in the Waste Processing Building in bulk containers, proper paper work will be completed and associated with each load in the event a facility inspection is performed.

Typically, only solid material is loaded into the roll-off containers and/or dump trailers, although some sludge material may also be off-loaded. However, free-flowing liquids are not typically

contained in the roll-offs or dump trailers. The roll-offs and dump trailers will be kept closed except when loading.

Roll-off containers or dump trailers approved for storing or transporting liquids will be utilized if the hazardous waste being transported or stored contains free liquids. These containers may include "sludge boxes" or sealed roll-offs with liners.

#### **2.4.7 Reactives Magazine**

The reactivities magazine consists of a custom Type 2 Class ABC, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) specification indoor magazine manufactured by Armag Corporation. The exterior of the magazine is constructed of ¼-inch ASTM A-36 prime steel and the interior is lined with 2-inch hardwood to meet bullet resistant requirements. It has a front opening door (cabinet type), casters, shelving, a double lock system with ¼-inch steel lock covers, two ATF approved padlocks, one 12-inch by 24-inch magnetic sign reading "DANGER-EXPLOSIVES," top lifting D-rings, and a red exterior finish. The dimensions of the magazine are 6 feet long by 6 feet wide by 7 feet tall, and the approximate weight of the unit is 6,000 pounds empty. Information on the reactivities magazine is contained in Appendix I (Volume 2 of 3).

The reactivities magazine will be used for the temporary storage and pass-through of road flares, DOT 1.4 material, marine aerial and signal flares, small arms munitions, black powder, residential fireworks and other permitted explosives. Due to the limited size and nature of the material (consumer commodities), the storage of this material is exempted from the provisions of the Federal explosives laws and a Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) storage license is not required. No forbidden explosives will be transported to the site and/or stored in the magazine. No treatment or processing of explosive materials will be completed onsite.

There will be no staging of material in the reactivities magazine area. Once moved to the reactivities area, the material will immediately be placed in the unit. There should be no exposure to the elements because of the short duration of time between movement to the reactivities magazine and placement in the unit. It will be kept secure by being locked except for those instances where material is added to or removed from the unit.

#### **2.4.8 Tanker Loading**

Liquid wastes will be loaded to a tanker truck for transport off-site. Wastes will be pumped from a container directly to the tanker. Tankers will be kept closed except when loading.

#### **2.4.9 Empty Container Management**

Empty containers and/or inner liners removed from empty containers which meet the requirements of 40 CFR 261.7 will be managed as RCRA Empty. Empty containers and/or liners that have held an acute hazardous waste listed in 40 CFR 261.31, 261.32, 261.33(e) will be managed as Acute Empty. Containers and/or liners which do not meet the requirements of RCRA Empty will be managed as Non-Empty Containers.

RCRA Empty containers smaller than 55 gallons will be recycled or managed as non-RCRA regulated solid waste. RCRA Empty containers 55 gallons and larger will be recycled, returned to reconditioners, or managed as non-RCRA regulated solid waste.



RCRA-Empty containers will be accumulated on an empty trailer, and/or at the truck loading/unloading area. The empty containers will be sent off-site for recycling, reconditioning, and/or disposal when sufficient quantity is available (usually a truckload). The empty container storage area will be inspected as per the inspection plan. Empty containers may be crushed and/or compacted on site.

Acute empty containers will be triple rinsed or managed as hazardous waste. Containers that are triple rinsed will be thoroughly rinsed using an appropriate solvent a minimum of three (3) times. The container will be fully emptied into a container, typically a 55-gallon drum or 5-gallon bucket following each rinse. The collected rinse solvent will be managed as hazardous waste. The rinsing will occur within the warehouse above the impervious floor.

Non-Empty containers will be managed as per the requirements for the material within the container.

#### **2.4.10 Household Hazardous Waste Management**

EQ manages a significant quantity of Household Hazardous Waste (HHW). The HHW is solid waste (mostly labpacks) which is not hazardous waste as defined in 40 CFR 261.4 (b) 1). The HHW is regulated under Subtitle D regulations which (by definition) do not apply to this permit. The inclusion of HHW information is for informational purposes only. EQ exceeds all applicable regulations for HHW Management. Nearly all HHW managed at the EQ facility is managed as if it were hazardous waste. EQ typically manifests (including Land Disposal Restriction notification) labels, and enters this information into the facility operating record for HHW shipments. Other permit requirements such as training, inspections, and contingency are typically adhered to by EQ for the management of HHW. The management of HHW is included in EQ facility capacity as labpack waste (20 gallons maximum per 55 gal. drum), containment, closure, and financial assurance calculations. Management of HHW does not interfere with management of RCRA regulated hazardous waste.

#### **2.4.11 Universal Waste**

The facility receives Universal Waste including batteries and mercury-containing lamps such as fluorescent lamps. Lamps are also received from Conditionally Exempt Small Quantity Generators (CESQGs). If Universal Waste is received in containers that show evidence of leakage, spillage, or damage that could cause leakage, the material will be repackaged into containers that are structurally sound and compatible with the waste. All Universal Waste is handled in a manner that will prevent breakage, releases of their components, and their exposure to moisture. Once received, the lamps and batteries are placed in storage. Universal Waste batteries are stored on the ramp located adjacent to Bay 3B as shown on **Figure 14**. Universal Waste Lamps are stored in the cargo area of a box truck that is able to be sealed from the weather. The storage location for the Universal Waste Lamps is also illustrated on **Figure 17**.

#### **2.4.12 Unknown Waste Handling Procedures**

EQ periodically receives unknown waste generated from off-site emergency clean-up activities. The unknown waste in all cases have been sufficiently characterized (by laboratory quality control, or similar means) to determine the waste compatibility and hazard class. This information will be sufficient for DOT approved shipping and handling of the waste, but may not be sufficient to fully manage the waste per 40 CFR Part 268 (Land Disposal Restrictions) until further information is

received. EQ will utilize the following procedure for the management of "not fully characterized" (i.e., unknown) wastes.

1. EQ (or other approved) personnel will sample the container of waste following DEP SOP 5000 (Waste Sampling) and/or other "procedures and guidelines" mentioned in this paragraph procedures and guidelines for approaching and sampling unknown waste.
2. Field screening tests for color, density, physical state, pH, ignitability, oxidizer potential, solubility, and water reactivity will be performed to characterize the compatibility and hazard class of the waste.
3. The waste will be labeled and manifested for transport to the EQ facility. Shipping name will be determined by the field characterization and, at minimum, will be Hazardous Waste Solid (or Liquid), Not Otherwise Specified (NOS). The legend "Pending Analysis" will be written on the container (or label) and manifest.
4. Any "not fully characterized" (unknown) waste received by the EQ facility will be segregated from all other hazardous wastes until the wastes are identified and waste compatibility is determined. This is an extra precautionary measure since waste compatibility will have been field determined prior to receipt. The segregated area utilized for these wastes will have a separate containment system not contiguous with the containment systems provided for the known wastes. EQ utilizes containment pallets for separate containment.
5. Each container of "not fully characterized" (unknown) waste will be sampled and analyzed following the procedures specified in the EQ Waste Analysis Plan.
6. Once the waste is fully characterized, the waste will be moved to the appropriate storage location and scheduled for treatment or shipment to an off-site disposal facility.
7. EQ will notify the Department detailing waste type and quantity if characterization of the waste indicates the waste is not authorized by the EQ permit. The waste will be removed within 10 working days to a permitted treatment, storage, disposal facility if it is not authorized by the EQ permit.

#### **2.4.13 Stormwater Management System**

The EQ facility is designed and built to minimize the potential release of hazardous waste or hazardous waste constituents to the air, soil or surface water. The CSB is totally enclosed. The building floor is more than four (4) feet above the grounds of the site to allow loading and unloading directly from truck to warehouse and from warehouse to truck. The building roof overhangs ten feet out over the loading and unloading docks.

Many features have minimized the potential of stormwater contacting hazardous waste or hazardous waste constituents. The 10-foot roof overhang reduces the amount of stormwater in the loading and unloading area. All waste managed in the loading and unloading area is in closed containers. Currently, an extra precautionary design of the facility is a stormwater filtration system. It should be noted that this system is not a required by this permit and is included for information purposes only.

The loading and unloading area is constructed of concrete and asphalt materials. The surface is sloped to containment trench. The containment trench runs from the north loading and unloading area to the south accumulation sump. All stormwater from the loading and unloading area flows to the 640-gallon concrete sump through the containment trench. The accumulated stormwater is pumped from the sump through a sand filter, two (2) carbon filters, and then to the stormwater drain where it flows (by gravity) to the stormwater retention pond.

The pump remains off during waste management operations with a potential of release of hazardous waste or hazardous waste constituents. When these operations (such as loading or unloading) are complete, the area, stormwater and stormwater systems are inspected. Unsatisfactory conditions (if any) are corrected prior to turning the pump on to activate the system. These inspections are also conducted daily (each operating day) as indicated the EQ Inspection Plan.

The retention pond has dimensions of 126 feet x 35 feet with an average volume of 0.1335 acre-feet and a slope of 3:1. The pond retains filtered stormwater. Non-filtered stormwater from roof drains also discharges into the pond. The stormwater containment trenches and sump are constructed of concrete. The holding sump has a capacity of 640 gallons. The sump pump can pump 30-40 gallons per minute. The sand filter has 3.1 square feet of filter area in a fiberglass wrapped shell. The sand filter can accommodate flow rates of 20-62 gallons per minute. The sand filter is an efficient means of filtering out potential solids, oils and greases. The sand in the sand filter system typically lasts for many years and is changed out as required. The filter can be back flushed when the filter pressure is high or the flow rate is restricted. Back flushed materials will be managed as either solid or hazardous waste depending upon the waste characterization. The carbon filter consists of a 55-gallon drum/carbon filter. The filter contains 200 pounds of activated carbon, which provides approximately three minutes of contact time at 20 gallons per minute. The filter is an effective means of filtering potentially toxic (organic and metal) constituents. The carbon will be replaced at least annually. Documentation of filter carbon replacement will be included in the facility operating record. EQ may increase the amount of sand or carbon if it becomes necessary. More frequent changing will occur if breakout or breakthrough is detected. The spent carbon will be managed as solid or hazardous waste (depending upon the waste characterization) if it is not returned to the manufacturer for regeneration.

### **3.0 GENERAL FACILITY STANDARDS**

#### **3.1 Location Standards**

In regard to seismic location standards, the EQ facility is not located within 200 feet of a fault which has had displacement in Holocene time. Political jurisdictions requiring demonstration of the seismic location standard are listed in Appendix VI to 40 CFR, Part 264. There are no such locations in the state of Florida and therefore the facility is assumed to be in compliance with the seismic location standard.

The EQ facility is not located in a 100-year floodplain. This is shown on the Federal Insurance Administration (FIA) of the Federal Emergency Management Agency (FEMA) 100-year floodplain map included on **Figure 5**. The only water body within a one-mile radius of the EQ facility is the Tampa Bypass Canal which is located approximately 3/4 mile east.

No on-site disposal occurs at the EQ facility. Wastes will not be placed in any salt dome formation, salt bed formation, underground mine, or cave. There are no surface impoundments, waste piles, or landfills.

The Southwest Florida Water Management WMIS (Water Management Information System) database was consulted to determine the presence of injection and withdrawal wells, both on site and off site, within 1000-ft around the hazardous waste management area. Information on these wells are contained in Appendix E of Volume 2 of 3. It should be noted that not every well permitted within this area was summarized in the table. The rule calls for injection and withdrawal wells within 1000-ft. The WMIS database is currently limited in its ability to sort wells in this fashion and professional judgment was used to screen out wells used for monitoring or recovery purposes considering the general heavy industrial use of the area surrounding the EQ facility. In addition, because of the way the wells are loaded into the database, most are given similar latitudes and longitudes due to poor information by the applicant or driller. This results in tens of wells plotting in the same place on the location map.

#### **3.2 Facility Security**

A seven-foot high security fence surrounds the entire EQ facility. The fence includes six foot of chain link fabric and a one-foot barbed wire parapet. Entry is controlled at all times through closed locked gates. The control gates consist of lockable pedestrian gates and a lockable vehicle gates located in various locations along the fence lines. The vehicle gates may remain open for no longer than one (1) hour during normal operations. A sign with the legend "Danger - Unauthorized Personnel Keep Out" is posted at each gate entrance. A second vehicular entrance is located at the southwest corner of the facility. This entrance facilitates improved traffic flow by allowing vehicles to enter at the southeast gate and exit at the southwest gate. This minimizes vehicles turning around and two-way traffic. The second gate remains closed and locked when not in use. It is also constructed of chain link with barbed wire parapet similar to the existing vehicle gate. Signs are also posted on the north, south, east, and west portions of the fence surrounding the facility. The legend is written in English and Spanish and is legible from a distance of at least 25 feet. The Container Storage Building is fully enclosed and all doors are locked during non-working hours. The Container Storage Building is also monitored by an automatic alarm system for fire. The fire alarm automatically notifies the City of Tampa Fire Department.

All site security features including fencing, gates, and signs are shown on **Figure 10**.

### 3.3 Traffic Information

The EQ facility is located in an area of Tampa zoned heavy industrial. The location is within easy access of major roads I-4, I-75, I-275, US 301, Highway 60, Highway 41 and the Crosstown Expressway. Vehicles may use these roads and others to access Orient Road. Vehicles heading south on Orient Road will turn right onto 9th Avenue then turn right into the entrance of the facility. Vehicles heading north on Orient Road will turn left onto 9th Avenue then turn right into the entrance of the facility. Exiting vehicles will turn left onto 9th Avenue from the exit of the facility. The vehicles will then be able to turn either left (north) or right (south) onto Orient Road to proceed to their destination. The vehicle gates allow vehicles to enter one gate and exit another while minimizing turnarounds and two-way traffic. Traffic flow is shown on **Figure 9**.

Traffic volume usually consists of two 24-foot semi-truck van loads per day and three truck loads (tractor trailer, roll-off, or tanker) per week. The semi-truck vans are utilized primarily for inbound waste shipments and tractor trailers are utilized primarily for outbound shipments. Inbound vehicles are utilized for outbound shipments when possible. Access roadways (9th Avenue) are constructed of 8-inch lime rock base primed and compacted to 98% maximum density and 2 inches of type S-1 asphaltic concrete. The design load bearing capacity is 2,500 psi at 95% of Standard Proctor. The roadways are maintained by the City of Tampa

### 3.4 Ignitable, Reactive, or Incompatible Wastes

EQ has taken precautions to prevent accidental ignition or reaction of ignitable or reactive waste. Ignitable and reactive wastes are separated from other wastes. Ignitable and reactive wastes are stored in Bay 2 of the Container Storage Building. All cyanide bearing waste will be stored in the northwest corner of Bay 2, the area identified as 2A in **Figure 14**. Bay 2 has been specifically designed and built for the storage of ignitable and reactive hazardous wastes. All four walls of Bay 2 are constructed of eight-inch wide concrete block, extending from the floor to the roof. The walls are designed for a minimum fire resistance of four hours. The floor is five inches of 4,000 psi concrete placed monolithically and coated with three layers of chemical resistant coatings and sealants. The roof is also constructed of concrete.

Lighting and other fixtures in Bay 2 are intrinsically safe (explosion proof). Bay 2 has smoke, flame and lower explosive limit (LEL) monitors. There are two LEL meters. One is mounted in the spill containment sump to detect vapors more dense than air. The second is mounted near the roof to detect vapors less dense than air. The LELs are set to automatically activate two blowers at 10% LEL and to automatically close magnetically released doors to the bay, activate the high expansion foam fire suppression system, the fire alarm, and automatically dispatches the Tampa Fire Department. ABC and Halon (or equivalent) fire extinguishers are located in Bay 2.

There is a single 1,001-gallon spill containment sump in Bay 2. The floor of the bay is sloped at 1/8 inch per foot so that all leaks and spills will be directed to the containment sump located in the center of the bay. The location of safety and fire control equipment located (or available) in Bay 2 is indicated on the building as-built record drawings included in Appendix D (in Volume 2 of 3) and facility evacuation routes are shown on **Figure 11**. Supplemental emergency and safety equipment not shown on the as built in Appendix D (Volume 2 of 3), or described in the PPP/CP (Appendix M of Volume 2 of 3) are also listed in Appendix H (Volume 2 of 3).

Transfer of ignitable liquids is by pouring, manual repack, manually operated pump, or air operated pump. Grounding cables are utilized when transferring ignitable liquids. Intrinsically safe, explosion proof, and non-sparking equipment is used in the ignitable/reactive storage bay (Bay 2). "No Smoking" signs are

located prominently throughout the facility. Smoking is only permitted in the designated smoking area located outside the north office entrance and west of the office in the undeveloped (inactive) portion of the facility. These designated areas are over 100 feet away from all ignitable, reactive, or any other hazardous waste area. Operational controls are in place to insure that no open flames are allowed within 50 feet of any ignitable or reactive waste. All ignitable and reactive waste is stored at least fifty feet from all property lines. All areas of Bay 2 (including the east wall and loading dock and 10,000-gallon improved secondary containment area) are at least 50 feet from the property line. This permit application is structured to provide detailed information on the precautions EQ has taken to prevent reactions which may:

1. Generate extreme heat, pressure, fire, explosion, or violent reaction;
2. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantity to threaten human health or the environment;
3. Produce uncontrolled flammable fumes or gases in sufficient quantities to threaten human health or the environment;
4. Damage the structural integrity of the device or facility; and,
5. Through other similar means which threaten human health or the environment.

These precautions begin before any waste is transported or received by the facility.

All prospective waste materials are thoroughly reviewed by EQ technical services staff prior to approval for transportation to or receipt by EQ. The waste generator prepares a profile of the prospective waste for EQ Technical Services Staff on EQ Waste Profile form (included in Appendix J in Volume 2 of 3). The form fully characterizes the waste including any applicable analytical results. A sample of the waste is included with the Waste Profile if necessary. This waste approval process is thoroughly described in the EQ Waste Analysis Plan.

Waste characterization forms for the most commonly received wastes at EQ are contained in Appendix K (Volume 2 of 3) along with a summary of the inbound waste shipments received in 2012. These forms also include the characteristically hazardous wastes that EQ intends to treat in the treatment tank and which formed the basis of the exposure evaluation described in Section 14.0.

All waste containers meet DOT specifications. The transporter inspects each container for proper DOT approved containers, container condition and integrity, proper closure, labels, and manifesting prior to receipt by EQ. EQ personnel double-check each of these items upon receipt at the facility. Representative samples of each waste are taken to verify the container contents are the materials approved on the EQ Waste Profile form. Selected samples are analyzed in the EQ laboratory (or subcontractor lab) to verify this information. These procedures are fully detailed in the EQ Waste Analysis Plan.

Waste containers are placed in the proper storage location based on the Waste Profile or laboratory quality control information. The storage of ignitable and reactive wastes in Bay 2 was previously discussed in this section. Bays 1 and 3 are further subdivided into two different containment areas each. Bay 1 has two different 1,001-gallon containment sumps to further segregate incompatible wastes within this bay. The north half of Bay 1 is sloped to one containment sump and the south half of Bay 1 is sloped to another containment sump. Bay 3 is subdivided into two different containment areas in the same manner. Incompatible wastes such as acids and alkalines are in either separate containment sections or bays. Three major incompatibility groups (acids/alkalines, oxidizers/ignitable organic solvents, and acids/cyanides) are stored in separate bays with floor to roof walls and separate 1,001-gallon containment sumps separating them.

There is no mixing of incompatible wastes at the facility. Waste compatibility is determined by test methods from "SW-846: Test Methods for Evaluating Solid Waste - Physical/Chemical Methods"; or equivalent accepted methods. No material will be transferred into an empty container or unit that previously contained an incompatible waste, unless the container or unit has been properly cleaned or decontaminated. All pumps and hoses will be properly cleaned or decontaminated to eliminate cross contamination with incompatible wastes. Processing or treatment is by batch mode. Only compatible wastes will be processed by any unit or treated in any batch. All units will be cleaned or decontaminated at the end of processing or between batches of incompatible wastes. All cleaning and decontamination fluids and residues collected will be analyzed and managed in accordance with all applicable local, state, and federal regulations.

### **3.5 Considerations under Federal Law**

No other federal environmental laws apply to the EQ facility.

## **4.0 WASTE ANALYSIS PLAN**

### **4.1 Introduction**

In accordance with the regulatory requirements set forth in 40 CFR 264.13 (b) and 40 CFR 268.7, EQ has developed this Waste Analysis Plan (WAP). The procedures set forth in this plan ensure that this facility will be in compliance with all the requirements of 40 CFR 264.13 and 268.7. A copy of the current plan will be available at the facility.

The purpose of this Waste Analysis Plan (WAP) is to identify and document the necessary sampling methods, analytical techniques and overall procedures that are undertaken for hazardous wastes that enter this facility for treatment or storage. As appropriate, the EQ facility will utilize as guidance the following EPA April 201 final document entitled: "Waste Analysis at Facilities That Generate, Treat, Store and Dispose of Hazardous Wastes: A Guidance Manual." In addition, EQ has a number of SOPs used internally and these are included in Appendix J (of Volume 2 of 3).

The EQ WAP describes the following:

1. Pre-Acceptance Procedures - Determines the acceptability of a particular waste stream pursuant to facility permit conditions and operating capabilities prior to shipment of that waste to the facility.
2. Incoming Waste Shipment Procedures - Identifies that the delivered waste shipment matches the accompanying manifest, as well as the pre-acceptance description (the profile), and the conditions of the facility permit.
3. Sampling Methods - Ensures that adequate quality control (QC) waste identification samples are properly obtained.
4. Analytical Techniques - Verifies that the waste received at the facility conforms to the properties and characterization approved on the waste profile form so that the appropriate treatment or storage techniques can be utilized.
5. Operational Procedures - Maintains safe and appropriate methods of storage, treatment and ultimate outbound shipment of wastes.

All RCRA-regulated wastes treated or stored at the facility will be handled in accordance with the Waste Analysis Plan. Non-RCRA regulated waste is, by definition, not regulated by RCRA. Non-RCRA regulated waste will be managed at the facility. This will not interfere with the management of hazardous waste at the facility. It is EQ's policy to screen non-RCRA regulated waste for hazardous characteristics utilizing the EQ WAP. This is to ensure that the facility will be in compliance with all applicable permits and regulations to properly, safely manage all waste.

All forms shown within this WAP are typical forms currently used by the facility. These forms may change or be updated to equivalent forms as regulations, customer needs, operations or company policy dictates. Updated copies of all forms outlined in this plan will be provided to the FDEP as these are put into use by the facility.

### **4.2 Pre-Acceptance Procedures**

EQ has developed procedures to determine the acceptability of specific wastes for management at the facility in accordance with safe storage, treatment and all prohibitions on Land Disposal (40 CFR Part 268). The pre-acceptance procedures dictate what information a potential customer will provide to enable EQ to determine the acceptability of the waste for treatment, storage and ultimate off-site disposal. The Pre-Acceptance Procedure is the mechanism for deciding to reject or accept a particular type of waste, prior



to its shipment to the facility, based upon the conditions or limitations of existing permits, applicable land disposal restrictions and its compatibility with other wastes being treated and stored, at the facility. EQ operations, technical, and field personnel are trained annually in completing waste profiles, DOT regulations (hazard classes, shipping names, and more) manifesting, and Land Disposal Restrictions (LDR).

The procedures listed below are utilized to review information and approve or reject waste prior to delivery to the facility.

1. The generator will provide EQ with a completed Waste Profile Form. A copy of the current EQ Waste Profile Form is included in Appendix J (Volume 2 of 3). The completed profile provides the following information:
  - General Information;
  - Physical Characteristics;
  - Chemical/Physical Composition;
  - Characteristic Constituents;
  - Reactivity & Other Hazards;
  - Hazardous Characterization;
  - Shipping Information; and
  - Certification.

At a minimum, the generator supplies all the information needed to treat, store, or dispose of the waste as required by 40 CFR Part 264.13(a)(1).

2. The generator will provide EQ with a representative sample, if requested. A copy of the current EQ Sample Chain of Custody form is included in Appendix J (Volume 2 of 3).
3. The generator will provide EQ with other supporting documentation, which may include Safety Data Sheets (SDS), laboratory analysis, and any information concerning Land Disposal Restrictions (LDR) of 40 CFR Part 268. A completed Land Disposal Restriction (LDR) form will describe the LDRs that apply to the waste. A copy of the current Land Disposal Restrictions form is included in Appendix J (Volume 2 of 3).
4. EQ will review information presented on the Profile, analytical data supplied by the generator, SDSs and other applicable documentation as supplied by the generator for:
  - Completeness;
  - Process producing waste;
  - Chemical constituents of waste;
  - Analytical results; and
  - Land Disposal Restrictions requirements.
5. EQ will determine the acceptability of the waste based on:
  - The permit conditions for the facility;
  - Facility operational requirements;
  - The compatibility of the waste being consolidated or treated;
  - The status of waste under current Land Disposal Restrictions;
  - The available on-site treatment capabilities; and
  - The available off-site recycling, reclamation, treatment or disposal options.

6. The pre-acceptance evaluation will be recertified biennially at a minimum. Recertification or pre-acceptance evaluations will be done when any of the following occur:
  - Biennially (every two years);
  - Waste Generation Process Changes;
  - Waste Analyses or Screening Changes; or
  - Regulatory Changes Related to Waste Analysis.
7. EQ may perform necessary annual analysis, dependent on the particular waste stream characteristics, from a representative sample of the waste received to ensure that the initial analysis is accurate and up-to-date.
8. Samples may be requested when the situation is warranted, such as for waste requiring treatment by solidification in order to perform solidification evaluation testing.

**Note:** Laboratory Packaged (Lab Pack) wastes are the exception to the above procedures. Lab pack procedures are discussed in the lab pack section of the WAP.

### **4.3 EQ Technical Services**

Approval chemists (or equivalent) and approval coordinators are responsible for the pre-acceptance evaluation decision (i.e., whether to accept for storage, treatment, and off-site disposal or reject the waste). The approval chemist or coordinator reviews the profiles for general information, physical characteristics, chemical/physical composition, characteristic constituents, reactivity/other hazards, hazardous characterization, shipping information, and certifications. The chemist or coordinator also reviews the process producing the waste, waste description, EPA waste code identifications, and chemical constituents to determine the facility's ability to safely and properly manage the waste for storage, treatment, and ultimate disposal.

Problems with the profile encountered during the evaluation process, such as EPA waste codes that do not correspond with the process producing waste statement, chemical constituents that do not correspond with analytical data supplied, or analytical data that does not confirm treatment standards have been met for land disposal restricted waste (when applicable), are noted by approval personnel. An attempt to resolve discrepancies will be made by contacting the generator for additional information, documentation or analytical data. Discrepancies that cannot be resolved will result in the rejection of the waste profile. A Technical Services Manager or equivalent is available to review approval and rejection decisions if necessary.

The pre-acceptance evaluation is concluded with the final decision regarding the acceptability of the waste. Storage, treatment and disposal decisions are based on (but not limited to):

- Conditions or limitations of existing permits and regulations
- Capability to safely manage the waste
- Regulatory requirements
- Results of compatibility evaluation or treatability tests (as appropriate)
- Management decision

#### **4.3.1 Waste Characterization**

Indicated below are the waste characterizations of the various waste streams managed at the treatment/storage and transfer facilities. Actual waste analysis information (if available), waste

profile information, supporting lab analytical, QC lab reports, manifests, land ban forms, and the EQ computer data base information will be retained as part of the facility operating record.

### **Ignitable Waste (I)**

Physical State: Liquid/Solid/Semi-Solid  
Chemical Composition: Flammable Liquids: Solvents, paints, thinners, alcohols, fuels, oils, etc.  
Flammable Solids: water-reactive metals, phosphorous, paint sludges, and solid residues, etc.  
Oxidizers: permanganates, nitrates, nitrites, perchlorates, etc.  
Disposal: Off-site via fuel blending, deactivation, and/or incineration.  
Other Data: Stored in an explosion-proof designed area.  
Oxidizers must be kept separate from organics.

### **Corrosive Waste (C)**

Physical State: Aqueous  
pH: Less than 2.0 and greater than 12.5  
Chemical Composition: Acids: Hydrochloric, nitric, chromic, phosphoric, sulfuric, etc.  
Caustics: Sodium hydroxide, potassium hydroxide, etc.  
Disposal: Off-site via neutralization. Alternately, some, or all, of the acceptable materials may be treated on-site in the treatment tank located in the WPB and disposed of at a subtitle D landfill once decharacterized, meets LDRs, and passes the PFT.  
Other Data: Keep acids and caustics separated from each other and do not add water to acids or caustics.

### **Reactive Waste (R)**

Physical State: Liquid/Solid/Semi-Solid  
Chemical Composition: Cyanides, sulfides, and water-reactive metals, etc.  
Disposal: Off-site via deactivation, and/or incineration.  
Other Data: Stored in an explosion-proof designed area.  
Cyanides and sulfides must be kept separate from acids.  
Water reactives are usually immersed in kerosene or mineral oil.

### **Toxicity Characteristic Waste (E)**

Physical State: Liquid/Solid/Semi-Solid  
Chemical Composition: D004 - D043 wastes.  
Disposal: Off-site via stabilization, incineration, or landfill. Alternately, allowable waste codes may be treated in the treatment tank and disposed of at a Subtitle D facility once decharacterized, meets LDRs, and passes the PFT.

### **Acute Hazardous Waste (H)**

Physical State: Liquid/Solid/Semi-Solid  
Chemical Composition: Arsenics, carbamates, endrin, lindane, toxaphene, methoxychlor, etc.  
Disposal: Off-site via incineration, stabilization/oxidation and/or Subtitle C facility.  
Other Data: May be an inhalation hazard.

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**Toxic Waste (T)**

Physical State:	Liquid/Solid/Semi-Solid
Chemical Composition:	Acetone, Acetyl Chloride, Acrylonitrile, Aniline, Azaserine, etc.
Disposal:	Off-site via incineration. Fuels blending, stabilization/oxidation and/or Subtitle C facility.
Other Data:	May be an inhalation hazard.

#### **4.4 Sampling Methods**

Sampling is performed at the facility by EQ personnel trained to sample incoming materials. The training includes personal protective equipment, sampling requirements, sampling equipment, and sampling techniques. All sampling personnel are HAZWOPER trained and are expected to follow appropriate health and safety procedures during all sampling and analysis activities. Based on generator knowledge of the waste to be sampled, health and safety procedures will be implemented to assure worker safety. These measures include wearing appropriate safety glasses, gloves and protective clothing or apron when collecting or handling samples

Specific sampling procedures are dependent on both the nature of the material and the type of container. This section presents sampling methods to be utilized by EQ personnel. The generator provides EQ with information concerning the concentration, as well as the nature of the waste components on the profile. The analysis to be performed is a conformance check. Sampling protocols will follow approved sampling methods.

The sampling equipment and procedures described in this Waste Analysis Plan represents the facility's recommended sampling protocol for general types of waste materials and containers. Certain waste materials or containers may require different sampling procedures or equipment. Procedures and equipment may be updated and revised as new equipment or procedures become available. In general, the methods utilized for sampling correspond to those referenced in 40 CFR 261, Appendix I. The general sampling methods and the equipment utilized for waste materials are presented in the Sampling Methods and Equipment Table which follows.

In addition to ASTM, FDEP and EPA sampling procedures, EQ has instituted specific methods for ensuring that samples taken from various types of containers are representative. The types of containers to be sampled at the facility vary, but usually are 55-gallon steel drums. Containers may consist of pails, drums, overpacks, totes, tankers, roll-off boxes, the hazardous waste treatment tank, or other DOT approved containers. The sampling devices are selected, depending on the size and type of containers and on the specific material involved.

Access to a container (e.g., barrel bungs) influence the location within the container from which samples can be taken. Every effort to achieve representative samples will be taken. Sampling of small containers (e.g., drums and pails) varies with the nature of the waste material. For flowable materials, the sampling device of choice is a Coliwasa, tubing or sample rod, to draw a full vertical section. For non-flowable wastes, tubing or a trier is normally used to obtain a sample. Table 4-1 shows sampling methods and equipment. As appropriate, the FDEPs SOPs (SOP) FS 5000 will be used to supplement the methods and equipment specified in Table 4-1.

**Table 4-1**  
**SAMPLING METHODS AND EQUIPMENT**

<u><b>Material</b></u>	<u><b>Method</b></u>	<u><b>Equipment</b></u>	<u><b>Sample Container</b></u>
Extremely viscous	ASTM D140-70, E300 (a)	Tubing (b) or thief	Plastic/Glass jar w/screw top
Crushed or powdered material	ASTM D364-75, E300 (a)	Tubing (b), trier, scoop, or shovel	Plastic/Glass jar w/screw top
Soil material	ASTM D420-69, E300 (a)	Tubing (b), trier, auger, scoop, or shovel	Plastic/Glass jar w/screw top
Soil-like material	ASTM D1462.65, E300 (a)	Tubing (b), trier, auger, scoop, or shovel	Plastic/Glass jar w/screw top
Fly ash-like material	ASTM D2234-76 (a)	Tubing (b), trier, auger, scoop, or shovel	Plastic/Glass jar w/screw top
Containerized Liquids	SW-846 (c) ASTM E300 (a)	Coli-wasa or tubing (b) or sampling rod	Plastic/Glass jar w/screw top
<b>NOTES:</b> (a) ASTM International. Annual Book of ASTM Standards. Philadelphia, PA. 1982 or most recent edition. (b) Personal Protection and Safety Training Manual (Cincinnati, OH: USEPA National Training and Operational Technology Center 1981), pp. 3-1 and 3-4. (c) U.S. Environmental Protection Agency. SW-846-Test Methods for Evaluating Solid Waste. Office of Solid Waste and Emergency Response, Washington, D.C., Third Edition 2009 or most recent edition.			

Liquids in large containers are sampled with a Coli-wasa, tubing, or sample rod to obtain a vertical section. A composite sample is obtained by taking equal volumes from each applicable port and mixing in a common container. Light, dry powders, granules and heavier solids are sampled by trier or shovel, or by coring with heavy tubing or an auger.

Sampling equipment will be decontaminated by scrubbing with a solution of Alquinox or similar material followed by a distilled water rinse. The sampling equipment will then be allowed to air dry and any further manufacturer recommended maintenance will be performed. The rinsate collected during decontamination will be containerized and will be added to the next batch of like material to be treated. Because the material will have been decharacterized and meets LDRs, it will no longer be hazardous and accumulation start dates are not applicable. A further option would be to decant the liquids and dispose of those as wastewater and to treat the accumulated sediments as solid waste in the solid waste treatment unit.

Sampling strategy and techniques are described in more detail in the Treatment Tank Section 12.0. The integrity of samples collected for internal EQ analyses will be documented on the internal chain of custody form contained in Appendix J (Volume 2 of 3). Samples intended for confirmatory analyses by an

independent off site laboratory will be packed and shipped in laboratory provided containers along with proper chain of custodies provided by the laboratory.

#### **4.5 Analytical Rationale**

Analyses are performed on selected incoming wastes by EQ to verify conformance with the approved profile. Analytical methods are classified as "Fingerprint Analyses," "Additional Analyses" and "Supplemental Analyses." This arrangement allows a progressive decision approach to waste identification enabling EQ to analyze and to adequately identify the waste and to provide operational controls for the various treatment processes as well as compatibility determinations. In addition, a minimum of 10 percent (considered an industry norm) of all waste received will be Quality Assurance (QA) checked for accuracy of classification. Any sample failing the 10% QC screen will be further analyzed in detail for the particular parameter(s).

All incoming waste shipments are subjected to the "Fingerprint Analyses." "Fingerprint Analyses" are sufficient to properly verify that the waste received is the same as the waste that was characterized and identified on the pre-acceptance evaluation (waste profile). This is not designed to characterize the waste. EQ may perform other "Additional Analyses" or "Supplemental Analyses" to provide further verification of waste characterization. "Additional Analyses" and/or "Supplemental Analyses" are performed at the direction of the Facility Management to further identify a waste or to make certain proper handling and treatment can be achieved. EQ management may select these additional and/or supplemental analyses to perform the annual analysis, when fingerprint analyses indicate non-conformance or to provide additional operational control and compatibility determinations. A summary of the analytical parameters within each category and their use is provided below:

##### ***4.5.1 Fingerprint Analyses***

The "Fingerprint Analyses" include six screening procedures that may be performed to provide a general identification of the waste received. These analyses provide the basis for the conformance check against the profile and manifest in confirming the identity of the waste. Based on a review of the Waste Characterization Report and a visual examination of the waste, the following fingerprint analyses may be performed based on the observations. The parameters and associated rationale of the six "Fingerprint Analyses" are as follows:

1. Physical Description (i.e. appearance, physical state, layers, etc.) is used to determine the general physical properties of the waste. This facilitates subjective comparison of the sampled waste with prior waste descriptions or samples. It is used to identify obvious differences in waste type. It is also used to identify the presence or absence of free liquid.
2. The pH Screen is undertaken to indicate the pH and, in general, the corrosive nature of the waste. The pH Screen will also aid in the compatibility determinations. pH may not apply to certain waste types (e.g., organic solvent waste, oil waste, or insoluble solid waste).
3. Water Mix is used to determine whether the waste has a potential to vigorously react with water to form gases or other products and to indicate whether it generates extreme heat when mixed with water. This test does not apply to wastes that are already in contact with excess water, or for which sufficient analytical data exist that indicate no potential reactivity with water.
4. Flammability Potential Screen is used to indicate the ignitability potential of the waste. It is also used to identify obvious differences in waste type, such as waste solvent substituted for a waste acid. This test can be applied to all waste liquids, semi-solids, or solids.

5. Organic Halogen Screen is used to indicate whether or not halogenated organics are present in the waste and the need for further analysis. It is also used to identify obvious differences in waste type such as waste solvent substituted for a waste acid. This test can be applied to all waste liquids, semi-solids, or solids. The Organic Halogen Screen will be used for wastes where halogen information is necessary. For example, hazardous wastes carrying halogen waste codes would not require this screen since it would not provide any useful information.
6. Oxidizer Screen is used to indicate whether or not the waste is a potential oxidizer. No EPA test method exists for identifying oxidizers. 40 CFR 261.21(a)(4) identifies oxidizers as defined in 49 CFR 173.151 by DOT. The DOT test involves igniting the material and a known oxidizer for comparison testing. The EQ Oxidizer Screen will not involve igniting oxidizers. The EQ Oxidizer Screen will be utilized to screen potential oxidizers. For example, obvious organic wastes would not require this screen since they cannot be oxidizers.

#### **4.5.2 Additional Analyses**

The applicability of these analyses as described below, are based on procedures and protocol formulated by EQ (when determined necessary for proper classification):

1. Solidification Evaluation Test is run to determine whether the waste is amenable to solidification and to determine the ratio of solidification reagent-to-waste required to effect solidification.
2. Land Disposal Restriction (LDR) Stabilization Evaluation Test is run to demonstrate whether or not a Land Disposal Restricted Waste can be stabilized to meet the appropriate treatment standard.
3. Oxidizer Screen is used to determine the presence of organic peroxides or inorganic oxidizers. It is not required if the waste is not suspected of being an oxidizer.
4. Cyanide Screen is used to indicate whether the waste has the potential to produce hydrogen cyanide upon acidification. It is not required if the pH of the waste is less than 6.0 or if the waste is not suspected of containing cyanides.
5. Sulfide Screen is used to indicate whether the waste has the potential to produce hydrogen sulfide upon acidification. It is not required if the pH of the waste is less than 6.0 or if the waste is not suspected of containing sulfides.
6. Peroxide Screen is used to indicate the presence of peroxides. It is not required if the waste is not suspected of containing peroxides.
7. BTU Screen is used on organic material to determine if BTU's are greater or less than 5,000 BTU/lb. for energy recovery by fuels substitution. It is not required for wastes not applicable to fuels substitution. It is also not required for fuels known to have greater than 5,000 BTU/lb.
8. Nitric Acid Screen is used to determine if material contains nitric acid. It is not required if the waste is not acidic or not suspected of containing nitric acid.
9. Radiation Screen is used to screen wastes for radioactivity above background. EQ is not permitted to accept radioactive or low-level mixed waste and does not routinely screen for radioactivity. This is an additional test EQ can perform using the Geiger Mueller counter if management had reason to suspect that an incoming waste contained radioactive material. It's uncertain what particular instance or set of circumstances would trigger the request, or need, for radiation screening.
10. GC Scan is used to identify separate organic compounds. A GC Scan may be requested by management if they believe it is needed.

11. Metals scan is used to identify metals constituents. A metals scan may be requested by management if they believe it is needed.
12. Consolidated Confirmatory Compatibility Testing. The SOP for this test procedure is contained in Appendix J (Volume 2 of 3) "Liquids Bulking." Compatibility Testing is performed to determine if materials are compatible prior to consolidation or treatment.

#### ***4.5.3 Supplemental Analyses Using Standard Techniques***

These test methods are adopted from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Office of Solid Waste SW-846, Updates and Appended Materials) and other EPA approved methods. Other methods may be added as required.

#### **4.6 Incoming Waste Shipment Procedures**

Each hazardous waste shipment, upon arrival at the facility, will be inspected, sampled and analyzed as defined herein. All RCRA-regulated waste shipments will be sampled and analyzed according to this WAP. This includes bulk shipments manifested to EQ even though it may be re-manifested out immediately without entering or not stored at the facility. All shipments received on manifest will be entered into the EQ electronic waste tracking system (WTS). This serves two purposes. First, it compares the actual waste shipment identity with that identified in the pre-acceptance phase and that listed on the waste manifest. Second, it ensures the proper management of the waste through final disposal off site.

The Quality Control (QC) sheets or WTS container tracking system tracks the waste through the facility from point of arrival at the receiving area to its final disposal. The current EQ QC sheet is included in Appendix J (Volume 2 of 3). The identity, quantity, and types of waste from each generator's incoming shipment are tracked and documented by the WTS tracking system and QC sheets. Fingerprint Analysis results are also tracked and documented by this method.

Incoming waste shipment identification verification begins upon arrival of the waste at the facility. The sampling and analysis of the incoming waste will be performed in accordance with the methods described in this WAP. The shipping papers for the waste are checked and compared to the approved profile. The waste will be accepted (pending quality control verification) if the shipping documents are correct. Shipping document discrepancies are resolved with the generator prior to acceptance (pending quality control verification) of any waste material. Hazardous waste shipments will be sampled and analyzed for at least the mandatory waste fingerprint analyses. This occurs every time a shipment is received. A flow chart of the EQ Waste Screening process is included in Appendix J (Volume 2 of 3).

A minimum of 10 percent of the containers per each waste stream will be selected for sampling of non-lab pack waste. Example: For a shipment of one waste stream of 80 containers, a minimum of 8 samples will be taken. Container samples that are related to one generator and one process may be composited prior to analysis, providing the individual samples are similar in physical appearance. If discrepancies are noted in samples taken from 10 percent of the containers, such as the material approved is a solid and liquids are found, all remaining containers will be opened and inspected (at minimum).

Certain types of waste are not sampled or analyzed. These are lab packs from facilities such as households, laboratories and schools, and "empty" containers. A visual inspection of at least 10 percent of the "empty" containers will be performed to ensure the containers are empty as per 40 CFR 261.7(b)(1). Lab pack procedures are described in the Lab Pack section of this WAP. Wastes such as light bulbs, lamps and batteries are also not sampled.



The general logic utilized by the facility personnel in deciding whether to accept or reject a particular waste load is based on "Fingerprint Analyses." Other major decisions regarding waste acceptance is the need for additional analyses, the actual waste identification, and an evaluation of whether a waste found to be off-specification can still be accepted.

The EQ chemist or facility manager decides whether additional analyses are required for a particular waste based on the following:

- Results of "Fingerprint Analyses"
- Knowledge of generator and/or waste-generating process
- Results of pre-acceptance evaluation.

Further testing will be required if the results indicate unexpected presence or absence of screen parameters with respect to pre-acceptance analytical results or if there is reason to suspect that the waste composition has changed. The effectiveness of the waste identification step is dependent on the following components:

- Inspection
- Sampling
- Analytical Results
- Waste Profile
- Any additional documentation supplied by the generator
- Land Disposal Restrictions of 40 CFR Part 268
- Waste Manifest
- Pre-Acceptance Analytical Results
- Management Decision

Laboratory personnel must classify the waste as being "off-specification" if it is significantly different in waste type from the information shown in the profile, the pre-acceptance evaluation or on the manifest. Wastes found to be in non-conformance may be rejected. They may be re-evaluated for possible acceptance by the facility despite the non-conformance or they may be shipped to an alternate TSD facility if the proper treatment method is available. The re-evaluation may be based on the following criteria:

- Permit Authorization
- Discussions with the Generator
- Facility Conditions
- Facility Manager's or Designee's Judgment

Pursuant to 40 CFR Part 265.72, the facility personnel must discuss and attempt to resolve with the generator any discrepancies between the actual waste and that shown on the manifest.

EQ does not accept the materials listed below:

1. Regulated Biomedical Waste. If incidental biomedical waste is discovered in the shipment and it is identified by the material being placed in a "red bag" or is clearly labeled as such, the material will be rejected back to the generator. If non-hazardous material, which is not regulated by chapter 64E-16 F.A.C. is discovered, the material will be handled as solid waste.
2. Regulated Radioactive Materials

## 4.7 Operational Procedures

Each movement of a waste within the facility during which any change in its type or overall properties occur may make it subject to additional inspection, sampling and analysis to determine appropriate handling and management of the waste. Many of the analyses needed for the treatment, storage, and disposal functions are performed during incoming shipment identification. These are not repeated unless it is known or believed that the waste identity may have changed during storage or processing.

## 4.8 Analysis of Treated Hazardous Wastes

Confirmatory analysis of the treated hazardous waste is conducted in order to confirm that the treated waste no longer exhibits the hazardous waste characteristic(s) (TCLP) for which it was listed, meets the LDRs (summarized in Section 12), and contains no free liquids (Paint Filter Test).

A single representative grab sample of the treated material is collected using the sampling protocols listed above in Table 4-1 Sampling Methods and Equipment. The Paint Filter Test (as determined by the Paint Filter Test Method 9095B) is initially conducted on a portion of the collected sample in the QA/QC laboratory and the results are known immediately after the test is completed. The remaining portion of the collected sample is then sent off-site for TCLP analysis by a NELAP accredited laboratory. The analytical methods used for the confirmatory analysis are identified below in Table 4-2 Treated Waste Analytical Methods. The results of the TCLP analysis are generally returned to EQ from the laboratory within 48-hours of sample submittal. However, it is

Reference Section 12 for treatment methods and processes and Appendix J (Volume 2 of 3) for SOP OPS-OP-071-FLA Hazardous Waste Treatment.

**Table 4-2 Treated Waste Analytical Methods**

Waste Code	Constituent	Analytical Method	Preparation Method	Leachate Method	Paint Filter Test
D004	Arsenic	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
D005	Barium	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
D006	Cadmium	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
D007	Chromium	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
D008	Lead	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
D009	Mercury	EPA 7470	EPA 7470	EPA 1311	EPA 9095B
D010	Selenium	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
D011	Silver	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
K062	Chromium	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
K062	Lead	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
K062	Nickel	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
UHCs <sup>1</sup>	Antimony	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
UHCs <sup>1</sup>	Beryllium	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
UHCs <sup>1</sup>	Nickel	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
UHCs <sup>1</sup>	Thallium	EPA 6010	EPA 3010	EPA 1311	EPA 9095B

1/ Most commonly encountered UHCs.

## **4.9 Quality Control Policy**

EQ intends to follow all sampling and testing criteria set forth in accordance with applicable SW-846 methods. For methods not addressed in SW-846, ASTM or comparably standardized laboratory methods will be used. It is EQ's understanding that this will be acceptable since our sampling and analysis at the facility are primarily for "Fingerprint Screening" of incoming wastes to assure that they meet profiled parameters. If a NELAP accredited laboratory has provided sufficient results then waste codes may be removed from the sampled containers.

EQ has developed a program of quality control practices and procedures to ensure that precision and accuracy are maintained throughout its laboratory. Contract laboratories employed by the company must be NELAP accredited. Data produced for use by DEP will use applicable DEP SOPs per the DEP Quality Assurance Rule, 62-160.210, .240, .300 & .320, F.A.C.

The EQ QC Sampling and Analysis Procedures are utilized to verify waste characterization and not to quantitatively analyze the waste. This section does not provide specific performance standards of quality control procedures for individual sampling and analysis techniques. Such specifics can be found in the facility Laboratory SOP manual. The specific performance standards are dynamic and are revised as warranted to reflect technological advances in sampling and analytical techniques.

## **4.10 Analytical Procedures**

### ***4.10.1 Fingerprint Analyses***

These are analytical procedures designated to identify or screen waste. They have been developed by EQ based upon its operating experience as rapid but effective means for establishing key decision parameters pertinent to proper waste management.

1. Physical Description. Samples are inspected and the physical appearance of the waste is recorded Physical State (solid, semi-solid, liquid, etc.)
2. pH Screen. Full-range pH paper or a pH meter is used directly on liquid samples and on the free liquid portion of liquid/solid samples.
3. Water Mix Test. Approximately equal volumes of waste and water are mixed. Water should be added to the waste rather than addition of wastes to water. The following characteristics are noted:

- Gross Solubility in H<sub>2</sub>O
- Gross Specific Gravity (heavier or lighter than water)

If water reactivity is noted (generation of gases, heat, turbulence or sudden physical changes such as solidification, thickening or emulsification) record the results.

4. Flammability Potential Screen. A small amount of a liquid waste sample or a solid waste sample is placed into an aluminum-weighing tray (or similar laboratory container). A flame is very briefly applied to the sample. If the sample does not ignite, the result is recorded as a negative flammability potential (e.g., negative). If the sample ignites with the application of a flame, then the result is recorded as positive and may require further investigation. Liquids with a negative flammability potential may be quantified using an approved flash point tester.

Solids may be further investigated (e.g., via review of the Generator's Waste Material Profile Sheet or other supporting documentation) to determine flammability and BTU value for possible fuel

blending disposal off site. The investigation will also examine the waste's potential to cause fire through friction, absorption of moisture, or spontaneous chemical changes.

**Note:** Halogenated solvents typically give off vapors that burn with a yellow (or greenish) smokey (sooty) flame in the presence of an external flame. Wastes with this type of non-sustaining flame are reported as having a negative flammability potential.

#### **4.10.2 Additional Waste Analyses**

1. Specific Gravity. This test is performed to aid in determining if an acid or base may be concentrated or to determine the weight of the material.
2. Cyanide Screen. This screening test is performed using Cyantessmo (or equivalent) test paper according to the laboratory operating procedure.
3. Sulfide Screen. This screening test is performed using lead acetate test paper (or equivalent) according to the laboratory operating procedure.
4. Radiation Screen. The sample is placed in a position below the Geiger-Mueller probe (or equivalent) for a period of at least five (5) seconds. An audible alarm and meter reading above the background reading will indicate radioactivity.
5. Oxidizer Screen. This screening test is performed using potassium-iodide starch test paper (or equivalent) according to the laboratory operating procedure. All positive oxidizer screen results will be verified with an ORP test (or equivalent).
6. Consolidated Confirmatory Compatibility Testing. The SOP for this test procedure is contained in Attachment J in Volume 2 of 3 "Liquids Bulking."

#### **4.11 Acceptance of Packaged Laboratory Wastes (Lab Packs)**

Laboratory chemicals from many different sources are accepted at the facility. The majority of the "laboratory chemicals" (lab packs) received by the facility are household exempt wastes. The household waste lab packs consist primarily of paints and paint related materials. Other household wastes include cleaners, pool chemicals, pesticides, and lawn chemicals. Lab packs from industrial generators consist of virtually any type of chemical acceptable by the EQ permit. Lab packs may be EQ packed or be "customer" (generator) packed. Lab packs that are EQ packed have been packed by EQ personnel (chemist or equivalent). The container contents have been reviewed, packed, documented, approved, and verified by an EQ chemist or equivalent. Generator packed lab packs have been packed by generator personnel. The generator submits a container contents sheet to EQ for review and approval. A copy of the current EQ lab pack container contents sheet is included in Appendix J (Volume 2 of 3).

The following is a partial example of lab pack guidelines and procedures that are used for lab pack wastes. Complete EQ lab pack guidelines are available on site at the EQ facility.

##### **4.11.1 Guidelines for Acceptable Lab Packs**

###### **Group 1: Alkali (with pH greater than 12.5)**

- A. Inorganic alkaline chemicals (e.g. sodium hydroxide, calcium hydroxide including alkaline salts, Na<sub>3</sub> PO<sub>4</sub>, sodium borate).
- B. Organic bases (e.g. triethanolamine)

###### **Group 2: Acids (with pH less than 2)**

- A. Inorganic acids (e.g. hydrochloric acid, sulfuric acid) as solids or as liquids.
- B. Organic acids, (e.g. stearic acid, citric acids, acetic acid)

**Group 3: Non-Hazardous - (e.g., plastics, oils)**

- A. No container larger than 5 gallons to be packed in drum.
- B. No more than 50#/containers of solids to be packed without special permission.
- C. Maximum quantities per lab pack container are as follows:
  - a) 20 gallons per 55-gallon drum
  - b) 11 gallons per 30-gallon drum
  - c) 2 gallons per 5-gallon drum
  - d) For solids, use spacing rule (e.g. 2-3 inches between drum walls and materials)
  - e) Sealed liquid containers should be overpacked in drum with enough compatible absorbent to absorb all liquid if broken.

The above list is not all-inclusive but should be regarded as an example of a basic packing guideline for lab packs.

**4.11.2 Unacceptable Lab Packs**

- A. Regulated Bio-Hazardous
- B. Regulated Radioactive Materials

**4.12 Procedure for Waste Acceptance**

Before containers are shipped to EQ, a waste profile form or electronic version must be submitted to EQ, including a complete set of container contents sheets describing the contents of each drum in terms of explicit chemical identification, quantities, concentrations, pH, etc., as applicable. EQ Technical Services (chemist or equivalent) will review the profile and the container contents sheets and inform the generator of any materials that are not acceptable, the packing of incompatible materials that are not acceptable, or the packing of incompatible materials within the same drum. When the necessary corrections have been made by the generator, corrected container contents (changes indicated, initialed, and dated) should be sent to EQ. After review of the corrections, the generator will be notified that the waste is approved for shipment. When the hazardous waste arrives at EQ, a chemist or equivalent will quality control check the labpacks. A minimum of 10% of EQ packed hazardous waste lab packs will be opened and inspected. Each generator packed hazardous waste lab pack (100%) will be opened and inspected. See the Waste Screening Flow Chart in Appendix J (Volume 2 of 3) for further information.

**4.13 Site Generated Waste**

Site-generated wastes include the following:

- Containment sump liquids and residues
- Spent fluorescent lamps
- Spent batteries
- Lab trash
- Lab wastes and rinses
- Samples (when hold time is complete)
- Personal protective equipment
- Chemical rags

Site-generated wastes are characterized and managed according to all applicable requirements and regulations.

## **5.0 INSPECTION PLAN**

### **5.1 General**

The EQ facility is regularly inspected for malfunctions and deterioration, operator errors, and discharges, which may cause (or lead to) release of hazardous waste constituents to the environment or a threat to human health. These inspections are intended to identify problems in time to correct them before a release of hazardous waste or constituents occur. A facility inspection log is maintained to document the results of these inspections.

### **5.2 Schedule**

Inspections will be performed by trained EQ operations personnel. All inspections will be reviewed and approved by a senior EQ employee (manager, supervisor, or chemist). All monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment, including the on ground treatment tank, that are important to preventing, detecting, or responding to human health or environmental hazards will be inspected daily (each operating day). The following are the typical hours of operation at EQ:

- Monday through Friday: 12:00 AM – 11:59 PM
- Saturday: 5:00 AM – 3:00 PM
- Sunday: 8:00 PM – 11:59 PM

The inspector will look for the items listed on the EQ Facility Inspection Log. All areas subject to spills, such as the loading/unloading, container storage areas, hazardous waste treatment tank, and oil-water separator are inspected daily (each operating day). All containers are inspected for container condition, closure, labeling, and aisle space. Housekeeping and proper storage in the storage building are also inspected daily. The vehicle loading and unloading areas and transfer facility vehicles and wastes are inspected daily to identify problems. External areas such as the area for storage of empty containers and the stormwater systems (trenches, filter, and retention pond) are inspected daily to identify problems. Safety and emergency equipment is inspected daily for condition, availability, and operations capability. The safety and emergency equipment inspected includes fire control equipment, communication devices, safety showers and eye washes, spill kits, exits, safety supply lockers, fire suppression and alarm systems, and LEL meter and sensors. The contents of the safety supply lockers will be inspected and inventoried monthly. The date of inspection and inventory will also be noted on the Facility Inspection Log. The contents of the safety supply lockers are to be used only in the event of an emergency. The date of re-inspection and re-inventory will be noted on the Facility Inspection Log. The waste inventory for each hazard class and bay, to include transfer facility waste, is noted daily on the inspection log.

### **5.3 Remedial Actions**

Every unsatisfactory condition noted during the inspection will be immediately corrected if possible. Items not immediately corrected will be noted on the inspection log. Unsatisfactory conditions noted on the inspection log will be corrected within fourteen (14) days. EQ will submit a written schedule to correct the deficiency to the FDEP should any deficiency not be corrected within fourteen (14) days. Where a hazard is imminent or has already occurred, remedial action will be taken immediately. The EQ Contingency Plan will be implemented if a fire, explosion, or unplanned release of hazardous waste or hazardous waste constituents occurs to the air, soil, groundwater, or surface water, which could threaten human health or the environment. All remedial actions completed will be noted on the inspection log.

## **5.4 Inspection Log**

A copy of the EQ Inspection Log is included as the following page. Inspections will be recorded on the inspection log. These records will be kept for a minimum of three (3) years from the date of the inspection. The inspection log records include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or remedial actions.

**EQ Florida, Inc.**  
**Container Storage Building (CSB) Inspection Log**

Date: \_\_\_\_\_  
Time: \_\_\_\_\_

Inspector: \_\_\_\_\_  
Approved By: \_\_\_\_\_

	SATISFACTORY	UNSATISFACTORY
1. Containers		
1.1 Condition, Closure, Compatibility & Leaks	_____	_____
1.2 Proper Labeling	_____	_____
1.3 Over 1 Year Accumulation Start Date	_____	_____
1.4 Proper Storage Location	_____	_____
1.5 Aisle Space, Exits & Housekeeping	_____	_____
2. Safety Equipment		
2.1 Fire Extinguishers	_____	_____
2.2 Telephones & Air Horns	_____	_____
2.3 Safety Shower & Eye Wash	_____	_____
2.4 Acid, Caustic, Solvent & Mercury Spill Kits	_____	_____
2.5 Emergency Exits	_____	_____
2.6 Safety Supply Lockers	_____	_____
2.7 Fire Suppression System, LEL Meter & Sensors	_____	_____
2.8 Signage	_____	_____
3. Vehicle Unloading Area		
3.1 Structural Integrity (cracks, damage, etc.)	_____	_____
3.2 Leaks, Spills & Standing Water	_____	_____
3.3 Trench Sumps (cracks, leaks, etc.)	_____	_____
4. Improved Secondary Containment Area (ISCA)		
4.1 Structural Integrity (cracks, damage, etc.)	_____	_____
4.2 Leaks, Spills & Standing Water	_____	_____
4.3 Trench Sumps (cracks, leaks, etc.)	_____	_____
5. Stormwater System		
5.1 Trenches	_____	_____
5.2 Sump & Filter System	_____	_____
5.3 Lock Out Box Installed	_____	_____
5.4 Retention Pond	_____	_____
5.5 Outfall No. #1	_____	_____

Waste Inventory		Total
Bay 1	Class 9	0
Bay 1	Acids	0
Bay 2	Flam Liquids	0
Bay 2	Flam Solids	0
Bay 2	Reactives	0
Bay 2	Aerosols	0
ISC	Flam Liquids	0
ISC	Aerosols	0
ISC	Flam Solids	0
Bay 3	Oxidizers	0
Bay 3	Alkalines	0
Bay 3	Poisons	0
Bay 3	Non-Regs	0
Outbound Staging		0
Inbound Bulk Staging		0
Inbound Staging		0
10-Day Transfer Facility		0
TOTAL HAZARDOUS WASTE IN STORAGE		
0		GALLONS

6. Additional Comments & Information: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Remedial actions necessary for unsatisfactory items: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. Remedial actions corrected and completed on: \_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name Signature

*The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.*



**EQ Florida, Inc. Inspection Log  
Bulk Container Storage (BCS)  
Waste Processing Building (WPB)  
10-Day Transfer AND Inbound/Outbound (I/O) Staging**

Date: \_\_\_\_\_  
Time: \_\_\_\_\_

Inspector: \_\_\_\_\_  
Approved By: \_\_\_\_\_

	SATISFACTORY	UNSATISFACTORY
1. Stormwater System		
1.1 Building Drains and Piping	_____	_____
1.2 Retention Ponds & Overflows	_____	_____
1.3 Inlet Pipe	_____	_____
1.4 Outlet Pipe, Housing & Snorkel	_____	_____
1.5 Outfall No. 2	_____	_____
2. 10-Day Transfer AND Inbound/Outbound (I/O) Staging		
2.1 No Leaks	_____	_____
2.2 Secondary Containment Integrity	_____	_____
2.3 Placarding & Identification Tags	_____	_____
2.4 Lot Integrity (cracks, gaps, etc.)	_____	_____
3. Bulk Container Storage (BCSAs)		
3.1 No Leaks	_____	_____
3.2 Bulk Container Integrity (tarps, bows, etc.)	_____	_____
3.3 Placarding & Identification Tags	_____	_____
3.4 Lot Integrity (cracks, gaps, etc.)	_____	_____
4. Container Storage (WPB)		
4.1 No Leaks	_____	_____
4.2 Condition & Closure	_____	_____
4.3 Proper Labeling	_____	_____
4.4 Aisle Space (2 ft. min.) & Housekeeping	_____	_____
4.5 Proper Storage Location (compatibility, etc.)	_____	_____
4.6 Over 1 Year Accumulation Start Date	_____	_____
5. Waste Processing Building (WPB) Containment		
5.1 Berm Structural Integrity (cracks, leaks, etc.)	_____	_____
5.2 Leaks, Spills & Standing Water	_____	_____
6. Hazardous Waste Treatment Tank		
6.1 Structural Integrity (cracks, leaks, etc.)	_____	_____
6.2 Interstitial Inspection Ports	_____	_____
7. Hazardous Waste Treatment Tank Ramp		
7.1 Structural Integrity (cracks, damage, etc.)	_____	_____
7.2 Leaks, Spills, Standing Water	_____	_____
7.3 Trench Sumps	_____	_____
8. Non-Hazardous Waste Solidification Tank		
8.1 Structural Integrity (cracks, leaks, etc.)	_____	_____
9. Non-Hazardous Waste Solidification Tank Ramp		
9.1 Structural Integrity (cracks, damage, etc.)	_____	_____
9.2 Leaks, Spills, Standing Water	_____	_____
9.3 Trench Sumps	_____	_____

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**EQ Florida, Inc. Inspection Log  
Bulk Container Storage (BCS)  
Waste Processing Building (WPB)  
10-Day Transfer AND Inbound/Outbound (I/O) Staging**

Date: \_\_\_\_\_  
Time: \_\_\_\_\_

Inspector: \_\_\_\_\_  
Approved By: \_\_\_\_\_

10. Safety Equipment

10.1	Fire Extinguishers	_____	_____
10.2	Air Horns	_____	_____
10.3	Safety Shower & Eye Wash	_____	_____
10.4	Spill Kit	_____	_____
10.5	Shredder Fire Suppression System	_____	_____
10.6	Signage	_____	_____

11. Reactives Magazine

11.1	Structural Integrity (cracks, damage, etc.)	_____	_____
11.2	Locked	_____	_____

12. Additional Comments & Information: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

13. Remedial actions necessary for unsatisfactory items: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14. Remedial actions corrected and completed on:

_____	_____	_____
Date	Print Name	Signature

WPB Inventory	Gallons
Acids	0
Alkalines	0
Class 9	0
Reactives	0
Non-Hazardous (Solid Wa:	0
Total Hazardous Waste =	0
Total Solid Waste =	0
<b>Total WPB Inventory =</b>	<b>0</b>

BCS Inventory	Cubic Yards
Hazardous Waste	0
Non-Hazardous Waste	0
<b>Total BCS Inventory =</b>	<b>0</b>

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## **6.0 TRAINING PROGRAMS**

### **6.1 General**

All EQ operations personnel involved in any hazardous waste handling, transportation, emergency response, storage or treatment will successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a safe manner that ensures the facility compliance with the requirements of 40 CFR Part 264.16. Contingency Plan training for EQ employees is documented in the Employee Training record. EQ personnel who do not typically visit the facility more than once per year, do not have to have a training record. These employees will be treated as visitors. They will be given a safety briefing and be accompanied by an employee with Contingency Plan training if they visit the facility. Training includes a combination of continuing education courses, university or community college courses, seminars, off-site courses, classroom instruction, video films, computerized courses, on-the-job training, readings, or safety meeting briefings. The training given to each employee will be documented on the Employee Training Record according to job description.

### **6.2 Training Director**

The EQ Training Program is directed by personnel trained in hazardous waste management procedures. The Training Program is under the direction of the EQ Compliance Manager. Training and management of the Training Program is conducted by the EQ Technical Staff consisting of a senior chemist, technical manager, and facility manager. Training is also conducted by outside professional training organizations and consultants. Trainer qualifications will include a combination of degrees, training, certifications, or experience in the field that is taught. Qualifications of all EQ trainers and personnel are included in the Employee Training Record. These records are filed in the Compliance Managers Office.

### **6.3 Contingency Plan (Emergency) Training**

All EQ employees have reviewed and are familiar with the EQ Contingency Plan. "Hands on" operations personnel involved in hazardous waste handling, transportation, emergency response, storage, or treatment have successfully completed a program of classroom instruction or on-the-job training that teaches Contingency Plan implementation. The course outline for the EQ Contingency Plan training is included in the Training Program. The Contingency Plan training includes an on-site emergency response drill and post-drill evaluation.

### **6.4 Training Schedule**

EQ facility operations personnel will successfully complete the EQ training program within six months of their assignment to hazardous waste operations or to a new position in hazardous waste operations. EQ operations personnel training will be updated and reviewed at least annually.

### **6.5 Annual Training Review**

Facility operations personnel will take part in an annual review of the initial training. The annual review will, at minimum, include Contingency Plan training review and update as well as the OSHA required 8-hour HAZWOPER training review and update. The Contingency Plan training review and update may be included within the 8-hour HAZWOPER training review and update.

## **6.6 Training Records**

The following documents and records are maintained for full-time EQ employees:

1. Job title for each position at the facility related to hazardous waste management.
2. The name of the employee filling each job.
3. A written job description for each position at the facility related to hazardous waste management.
4. The required skills, education, qualifications, and duties of employees assigned to these positions.
5. A written description of the type and amount of introductory and continuing training given to each person filling these positions.
6. Records or certificates that document the training or job experience required, given to, and completed by facility operations personnel.

## **COURSE OUTLINE**

### **EQ 24 (or 40) Hour OSHA HAZWOPER Training** *(As Required by 29 CFR 1910.120)*

- ✓ Regulatory Review 29 CFR 1910.120
- ✓ Toxicology
- ✓ Principles of Hazardous Materials
- ✓ Right-To-Know (HAZ-COM)
- ✓ Personnel Protective Equipment (PPE)
- ✓ Respiratory Protection
- ✓ Contingency Plan Implementation
- ✓ Spill Clean-up Drill
- ✓ Decontamination
- ✓ Manifests, Profiles, Labels, & Land Bans
- ✓ DOT Labeling, Placarding, & Shipping
- ✓ On-The-Job Training
- ✓ Site Control/Site Safety & Health Plan
- ✓ Emergency Response
- ✓ Hazardous Waste Operations
- ✓ Firefighting Procedures
- ✓ Emergency First Aid/CPR

## **COURSE OUTLINE**

### **EQ 8-Hour OSHA HAZWOPER Refresher** *(As Required by 29 CFR 1910.120)*

- ✓ Contingency Plan Implementation
- ✓ Mock Chemical Spill Drill
- ✓ SCBA and Air Line
- ✓ Cartridge Respirator
- ✓ Respirator Fit Test
- ✓ PPE (Vendors)
- ✓ Florida Right-To-Know
- ✓ Manifests, Profiles, Labels, & Land Bans
- ✓ DOT Labeling, Placarding, & Shipping
- ✓ On-The-Job Training
- ✓ Safety Meetings
- ✓ Emergency Response
- ✓ Hazardous Waste Operations
- ✓ Firefighting Procedures
- ✓ Emergency First Aid/CPR

## **COURSE OUTLINE**

### **EQ Hazardous Waste Management Procedures & Contingency Plan Implementation**

- ✓ Emergency Response
- ✓ Emergency Procedures
- ✓ Emergency Equipment
- ✓ Emergency Systems
- ✓ Communications and Alarms
- ✓ Response to Fires and Explosions
- ✓ Response to Groundwater Incidents
- ✓ Shutdown of Operations
- ✓ Response Drill
- ✓ Response Drill Evaluation

## **COURSE OUTLINE**

### **EQ Hazardous Waste Management Operations**

- ✓ Introduction to Hazardous Waste Management Operations
- ✓ Waste Management Procedures
- ✓ Waste Management Documentation
- ✓ Safety and Emergency Procedures
- ✓ Transportation Procedures and Documentation



## **COURSE OUTLINE**

### **EQ Personal Protective Equipment (PPE) Training** *(Protection Required by Hazard Level)*

#### **A. LEVEL A**

- a) Recognition of Level A Hazards
- b) Description of PPE Required

#### **B. LEVEL B**

- a) Recognition of Level B Hazards
- b) Description of PPE Required

#### **C. LEVEL C**

- a) Recognition of Level C Hazards
- b) Description of PPE Required

#### **D. LEVEL D**

- a) Recognition of Level D Hazards
- b) Description of PPE Required

## **JOB DESCRIPTION**

### **GENERAL MANAGER**

**Job Title:** General Manager

**Job Description:** The General Manager has the overall responsibility for administrative, profitability, environmental, health, and safety operations and maintenance of the company.

**Reports To:** Vice President.

**Qualifications:** Minimum four-year degree in chemistry, engineering or related physical science and seven years' experience in waste management or similar field. Equivalent years of education and/or experience may be substituted.

Applicants must pass pre-employment physical and drug screening.

**Responsibilities:** Plan, direct and monitor facility operations.

Ensure environmental, health and safety regulatory compliance of all company operations.

Plan, direct and monitor administrative operations and profitability.

Represent EQ in community, regulatory, and public relation activities.

Carry out corporate policy and standards regarding facility, equipment, operations and maintenance.

## **JOB DESCRIPTION**

### **MANAGER**

**Job Title:** Operations Manager  
Industrial Services Manager  
Project Manager  
Transportation Manager

**Job Description:** Managers have the overall responsibility for facility/field operations and maintenance.

**Reports To:** General Manager

**Qualifications:** Minimum four-year degree in chemistry or equivalent experience, engineering or related physical science and five years' experience in waste management or similar field. Equivalent years of education and/or experience may be substituted.

Applicants must pass pre-employment physical and drug screening.

**Responsibilities:** Plan, direct and monitor waste operations.

Train waste handlers.

Carry out corporate policy and standards regarding facility, equipment, operations and maintenance.

Ensure the regular inspection of the facility and equipment and the implementation of any necessary repairs or remedial actions.

Coordinate with Technical Service Department and implement necessary actions or plans for training programs, environmental, safety and health regulatory compliance.

Act as the primary emergency response coordinator.

Manage EQ laboratory operations.

## **JOB DESCRIPTION**

### **COMPLIANCE MANAGER**

- Job Title:** Environmental, Health & Safety
- Job Description:** The Compliance Manager has responsibility for the development and implementation of programs and procedures required for training, environmental, safety, and health regulatory compliance related to waste operations.
- Reports To:** General Manager
- Qualifications:** Minimum four-year degree in chemistry or equivalent experience, engineering or related physical science and five years' experience in waste management or similar field. Equivalent years of education and/or experience may be substituted.
- Applicants must pass pre-employment physical and drug screening.
- Responsibilities:** Plan, direct and monitor training, environmental, safety, and health compliance activities.
- Evaluate and approve in-bound waste streams.
- Develop outbound waste approvals.
- Represent EQ in local community affairs and public relation activities.
- Carry out corporate policy and standards regarding facility, equipment, operations and maintenance.
- Evaluate laboratory data.
- Evaluate incoming waste for acceptability.
- Manage EQ training program

## **JOB DESCRIPTION**

### **SUPERVISOR**

**Job Title:** Operations Supervisor  
Lead Coordinator

**Job Description:** The Supervisors have the responsibility, under general supervision, for waste handling activities such as sampling, identifying, packaging, storing and loading of waste materials in the field or at the facility.

**Reports To:** Operations Manager  
Project Manager

**Qualifications:** Graduation from high school or equivalent (GED) and three years' experience in waste handling operations.

Applicants must pass pre-employment physical and drug screening. Drivers must possess CDL license and pass DOT physical and drug screening.

**Responsibilities:** Supervise and conduct waste stream sampling.

Supervise and conduct labeling of waste containers.

Supervise and conduct loading and unloading waste materials.

Supervise and conduct transfer, storage, or treatment of hazardous and non-hazardous wastes.

Supervise and conduct facility and equipment maintenance as directed.

Transportation of waste materials.

Transportation documentation.

## **JOB DESCRIPTION**

### **WASTE TECHNICIAN**

**Job Title:** Hazardous Waste Technician  
Driver

**Job Description:** The Waste Technician has the responsibility, under direct supervision, for sampling, packaging, storing, loading and transferring of waste materials.

**Reports To:** Operations Supervisor  
Lead Coordinator  
Industrial Services Manager  
Transportation Manager

**Qualifications:** Graduation from high school or equivalent (GED).  
  
Applicants must pass pre-employment physical and drug screening.

**Responsibilities:** Sampling waste streams.  
  
Labeling waste containers.  
  
Loading waste materials onto trucks.  
  
Transfer of hazardous and non-hazardous wastes.  
  
Facility and equipment maintenance as directed.

## **JOB DESCRIPTION**

### **TRANSPORTATION COORDINATOR**

**Job Title:** Transportation Coordinator

**Job Description:** The Transportation Coordinator has the direct responsibility for activities involving transportation of waste materials.

**Reports To:** Transportation Manager.

**Qualifications:** Minimum four-year degree in chemistry, engineering or related physical science and two years' experience in waste management transportation. Equivalent years of education and/or experience may be substituted.

Applicants must pass pre-employment physical and drug screening.

**Responsibilities:** Plan, direct and monitor waste transportation operations.

Maintain transportation records.

Carry out corporate policy and standards regarding waste transportation.

Coordinate with Technical Service Department and implement necessary actions or plans for regulatory compliance.

Documentation of waste shipments.

## **JOB DESCRIPTION**

### **CHEMIST**

**Job Title:** Facility Chemist  
Field Chemist  
QA/QC Chemist

**Job Description:** The Chemists have the responsibility, under general supervision, for facility operations.

**Reports To:** Operations Manager  
Project Manager

**Qualifications:** Minimum four-year degree in chemistry, engineering or related physical science and two years' experience in waste management or similar field. Equivalent years of education and/or experience may be substituted.

Applicants must pass pre-employment physical and drug screening.

**Responsibilities:** Plan, direct, conduct, and monitor facility operations.

Plan, direct, conduct, and monitor field service operations.

Analyze and evaluate incoming waste streams for acceptability.

Direct appropriate waste management actions.

Carry out corporate policy and standards regarding facility, equipment, operations and maintenance.

Prepare shipments for outbound disposal.

Ensure the regular inspection of the facility and equipment and the implementation of any necessary repairs or remedial action.

Documentation of waste management activities.

Quality control analysis of waste samples.



## **JOB DESCRIPTION**

### **ADMINISTRATIVE**

**Job Title:** Project Coordinator  
Retail Coordinator  
Approvals Coordinator  
Receiving Coordinator

**Job Description:** Administrative personnel have the responsibility, under general and/or direct supervision, for administrative duties related to the efficient operation of the facility, such as, maintaining written record of all waste-handling activities.

**Reports To:** Operations Manager  
Project Manager

**Qualifications:** Graduation from high school or equivalent (GED) and one year's clerical experience.  
  
Applicants must pass pre-employment physical and drug screening.

**Responsibilities:** Answering phones and directing calls.  
  
Operate gate.  
  
Recordkeeping (preparation, distribution, and retention).  
  
Maintain clerical supplies.  
  
Computer data entry.  
  
Administrative equipment maintenance (fax and copy machine).

## **6.7 Training Records Retention**

Training records on current personnel will be kept until closure of the facility. Training records on inactive former employees will be kept at least three years from the date the employee last worked at the facility. Inactive files will be kept in storage in archive files.

## **7.0 MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING**

### **7.1 Required Notices**

Generators will be notified in writing that EQ has the appropriate permit for, and will accept, the waste the generator is shipping. Copies of this written notice are kept as part of the operating record. Copies of the EQ permit are available for review. The FDEP will be notified in writing at least 2 (two) weeks in advance of the date the waste is expected to arrive at the facility if EQ arranges to receive hazardous waste from a foreign source.

The EQ owner or operator will notify any new owner or operator in writing of the required notices of 40 CFR Parts 264.12 and 270 before transferring ownership or operation of the EQ facility during its operating life. There are currently no plans to transfer ownership or operation of the EQ facility.

### **7.2 Manifest System Use**

All hazardous wastes entering and leaving the EQ facility will be accompanied by a Uniform Hazardous Waste Manifest. All manifested hazardous waste shipments will be accompanied by Land Disposal Restrictions certifications.

For inbound (receiving) waste shipments, the EQ facility owner, operator, or agent will:

1. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest is received;
2. Significant discrepancies in the manifest [as defined in 40 CFR 264.72(a)] will be noted on each copy of the manifest; *[Note: The EQ facility waste analysis may not be complete prior to signing the manifest and giving it to the transporter. Unreconciled discrepancies discovered during later analysis will be reported as per 40 CFR 264.72 (b).]*
3. The transporter will be given one copy of the signed manifest;
4. A copy of the signed manifest will be sent to the generator within 30 days after the delivery; and,
5. EQ will retain a copy of each manifest at the facility for at least three years from the date of delivery.

For outbound (exiting) waste shipments, the EQ facility owner, operator, or agent will:

1. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest is properly shipped;
2. Have the designated transporter sign acknowledging receipt of the waste shipment;
3. Retain a copy of the manifest (generator copy) and submit the other copies (complete with Land Disposal Restriction notifications) to the designated transporter;
4. Significant discrepancies in the manifest [as defined in 40 CFR 264.72 (a)] will be noted on the manifest;
5. The returned copy of the manifest (signed by designated Facility) will be filed with the original manifest copy retained; and,
6. EQ will retain a copy of each manifest at the facility for at least three years from the date of delivery.

The EQ facility does not have rail or water access in order to receive hazardous waste directly from a rail or water transporter. Shipments of hazardous waste initiated from the EQ facility will comply with the requirements of 40 CFR 262.

### **7.3 Manifest Discrepancies**

Upon discovering a significant manifest discrepancy, the EQ owner, operator, or agent will attempt to reconcile the discrepancy with the waste generator, transporter or designated facility. Manifest discrepancies are differences in quantity or type of hazardous waste designated on the manifest, and the quantity or type of hazardous waste a facility actually receives. Significant discrepancies in quantity are:

1. Variations greater than 10 percent in weight for bulk waste, and
2. Any variation in piece count (quantity of containers in a truckload for containerized wastes).

Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid, or hazardous waste constituents not reported on the manifest. Discrepancies not resolved within 15 days after receiving the waste, will require notification to the FDEP. The EQ owner, operator, or agent will submit to the FDEP a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue.

### **7.4 Operating Record**

A written operating record will be kept at the EQ facility. The following information will be recorded and maintained in the operating record until closure of the facility:

1. A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its storage, shipment or treatment at the facility.
2. A description of the common name and EPA hazardous waste number which applies to the waste.
3. The physical form of the waste.
4. The process generating the waste (for hazardous waste not listed in 40 CFR, 261, Subpart D).
5. The manifest-reported weight or volume and density; and
6. The methods (by handling codes) and dates of storage or treatment.
7. The location of each hazardous waste within the facility and quantity at each location.
8. Records and results of waste analyses performed.
9. Reports and details of all incidents that require implementing the contingency plan.
10. Records and results of inspections (these data need be kept only three years).
11. Monitoring, testing or analytical data, and corrective action where required by 40 CFR 264, Subpart F (Solid Waste Management Units), Miscellaneous Units, and Air Emission Standards for Equipment Leaks.
12. Notices to generators.
13. All closure cost estimates.
14. A certification no less often than annually, that a program is in place to reduce the volume and toxicity of hazardous waste that is generated to the degree determined to be economically practicable; and the method of treatment or storage is that practicable method currently available which minimizes the present and future threat to human health and the environment.
15. A copy of the Land Disposal Restriction notice, and the certification and demonstration, if applicable, required by the generator or owner or operator.

Most of the operating record information will be entered and stored on the EQ computer management information system.

## **7.5 Records Retention**

All records, including plans, will be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the FDEP who is duly designated by the Administrator.

The retention period for all records required under this part will be extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the Administrator or FDEP.

A copy of records of waste disposal locations and quantities will be submitted to the FDEP and local land authority upon closure of the facility.

## **7.6 Biennial Report**

EQ will prepare and submit a biennial report to the FDEP by March 1 of each even numbered year. The report will cover facility activities during the previous calendar year and will include:

1. The EPA identification number, name, and address of the facility.
2. The calendar year covered by the report.
3. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year; for imported shipments, the report will give the name and address of the foreign generator;
4. A description and the quantity of each hazardous waste the facility received, treated, and shipped during the year. This information will be listed by EPA identification number of each generator;
5. The method of treatment, storage, or shipment for each hazardous waste;
6. The most recent closure cost estimate;
7. A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated;
8. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and
9. The certification signed by the owner or operator of the facility or his authorized representative.

## **7.7 Unmanifested Waste Report**

If the facility accepts for treatment or storage, any hazardous waste from an off-site source without an accompanying manifest, or without an accompanying shipping paper, and if the waste is not excluded from the manifest required by 40 CFR, 261.5, EQ will prepare and submit a report to the FDEP within fifteen days after receiving the waste. The report will be designated "Unmanifested Waste Report" and include the following information:

1. The EPA identification number, name, and address of the facility;
2. The date the facility received the waste;
3. The EPA identification number, name, and address of the generator and the transporter, if available;
4. A description and the quantity of each unmanifested hazardous waste and facility received;
5. The method of treatment or storage for each hazardous waste
6. The certification signed by the EQ owner or operator or authorized representative.
7. A brief explanation of why the waste was unmanifested, if known; *[Note: Conditionally exempt small quantities of hazardous waste are excluded from regulation under this part and do not require a manifest.]*

## **7.8 Waste Minimization**

EQ certifies that a program is in place to reduce the volume and toxicity of waste generated to the degree determined to be economically practicable and that selected practicable methods of storage or treatment minimize the present and future threat to human health and the environment.

## **7.9 Additional Reports**

EQ will also report to the FDEP:

1. Releases, fires, and explosions requiring implementation of the Contingency Plan;
2. Facility closure; and
3. As otherwise required

## 8.0 SOLID WASTE MANAGEMENT UNITS

### 8.1 Facility Setting

The EQ facility is located in a heavily industrialized area (Orient Park) in Tampa, Florida. The previous use of the EQ property was residential (one residence) and vacant land. There is significant documented groundwater contamination in the Orient Park area. Two NPL (Superfund) sites adjacent to the EQ facility are being investigated and remediated under the direction of the EPA. There are also several other sites or former sites potentially contributing to the documented Orient Park groundwater contamination. The site and surrounding area are shown on **Figure 1**.

The requirements of 40 CFR 264 Subpart F (releases from Solid Waste Management Units (SWMUs) do not apply to the EQ facility. There have been no releases from any SWMU at the EQ facility. EQ will comply with the EPA and FDEP requirements of the Final RFA Report.

### 8.2 SWMU Discussion

A SWMU RCRA Facility Assessment (RFA) of the EQ Florida, Inc. facility was initiated on February 15, 1993. The RFA was based on a preliminary review (PR) of US EPA Region IV and Florida Department of Environmental Protection (FDEP) files and a visual site inspection (VSI) of the EQ facility. The PR was performed during the week of February 15-19, 1993. The VSI was conducted on February 25, 1993. A RFA report was issued by FDEP and EPA Region IV.

The purpose of the RFA was to identify SWMUs and other potential sources of environmental contamination not necessarily involving hazardous wastes. The SWMUs were evaluated for their potential of release of hazardous wastes or hazardous waste constituents to the air, surface water, soil, and groundwater.

An RFA of the EQ facility was also conducted by the EPA on August 18, 1988. The EQ facility was a new facility planned for construction at the time of the 1988 RFA. It was determined that there was no evidence of solid waste management activities at the site. It was also determined that there was no evidence of a prior or continuing release of hazardous waste or hazardous waste constituents at the site. Therefore, at the time of 1988 RFA, Section 3004 (u) of the Hazardous and Solid Waste Amendments (HSWA) of 1984 did not apply. The summary letter from the EPA concerning the 1988 RFA and a RFA Addendum prepared by the FDEP, dated May 13, 2011, are included in Appendix G.

The 1993 draft RFA (PR and VSI) resulted in the identification of six (6) SWMUs. The units identified are the container storage building and five sumps (SWMU #1), the entire loading/unloading dock area (SWMU #2), the stormwater retention pond (SWMU #3), the filter press (SWMU #4 no longer in use), the municipal waste dumpster (SWMU #5) and the sand and carbon stormwater filtration system (SWMU #6). All SWMUs identified at the EQ facility were determined to have no evidence of release prior to or at the time of the draft 1993 RFA.

An RFA Addendum was completed by the FDEP on March 13, 2011. The RFA Addendum updated the SWMU information submitted in the July 22, 2010 Part B permit renewal application. The EQ SWMUs previously and currently have not had any release of hazardous waste or hazardous waste constituents. The EQ SWMUs are identified on **Figure 17**.

The SWMUs at the facility are listed in Appendix G (Volume 2 of 3) and the following information describes the waste generation and activity at each identified SWMU:

**SWMU #1 (Concrete Container Storage Building and Five (5) Sumps)**

The concrete Container Storage Building is used to store containers (primarily 55- gallon drums) of permitted hazardous and non-hazardous wastes. The Container Storage Building is composed of three (3) separate containment bays having a total of five (5) collection sumps. Each collection sump has a capacity of 1,000 gallons. The collection sumps are seamless and made of pre-cast concrete coated with sealant. 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. The maximum storage area and sump volumes capacities are 50,000 gallons and 5,000 gallons respectfully. The interior storage areas and sumps are visually inspected daily.

**SWMU #2 (Loading/Unloading Dock)**

The loading/unloading dock is a concrete surface to load and unload permitted hazardous and non-hazardous wastes. The loading area is covered by a roof and sloped towards the containment trench. The area also contains an epoxy coated improved containment area in front of Bay 2.

**SWMU #3 (Retention Pond)**

The retention pond has dimensions of 126 ft. by 35 ft. with an average volume of 0.1355 acre-feet and a slope of 3:1. The pond is used to retain stormwater runoff.

**SWMU #4 (Filter Press-Certified Closed)**

The filter press was decontaminated prior to submittal of the revised hazardous waste application and a closure certification report was submitted to the FDEP under separate cover. The former unit was certified closed on October 31, 2013.

**SWMU #5 (Municipal Waste Dumpster)**

The steel municipal waste dumpster is located on the concrete loading/unloading area. The dumpster has an approximate capacity of 2.5 cubic yards and is used for municipal solid wastes until disposal pick-up.

**SWMU #6 (Stormwater Pre-Treatment Unit)**

Stormwater from the truck loading/unloading area drains to a concrete trench drain which flows from north to south along the loading area. The trench drain flows to a 640-gallon concrete holding sump, which is equipped with a sump pump with a capacity of approximately 30 to 40 gallons per minute. The sump pump pumps the stormwater from the holding tank through sand and carbon filters and then to the stormwater retention pond. The pump is set to keep the sump level to below 300 gallons. The carbon filter utilizes activated carbon to remove contaminants and has specifications which include 24 inch by 36 inch dimensions (diameter/height), 200 pounds of carbon, and a flow rate of twenty gallons per minute (gpm) at 2 ½ minute contact time. The sand filter has a flow rate of 20 gpm per square foot, and a 3.1 square foot filter area.

**SWMU #7 (Waste Processing Building)**

The Waste Processing Building is used for the receiving, processing, and associated storage, loading, unloading, and transfer of solid and hazardous waste. The building consists of a concrete pad and a steel roof structure. The north and south sides of the structure are solid walls and the east and west sides are open in the southern two-thirds of the building to allow for the movement of waste and equipment in and out of the structure. The east and west walls of the building are closed in its northern third. The solid and hazardous waste processes completed in this structure include segregation, decanting, filtration, solidification, treatment and shredding. The non-hazardous treatment tank is located in this building along with the high volume industrial waste shredder. An approach ramp and a 4-foot high platform are located on the southeast side of the structure that



allow waste to be emptied from trucks and containers directly into the non-hazardous treatment tank.

The hazardous waste treatment tank is installed adjacent to a ramp on the southeast corner of the building. A non-hazardous waste ESU and associated 24-inch high approach ramp is located in the building approximately 30 feet to the north of the hazardous waste treatment tank.

The solid waste side of the operations is kept separate from the hazardous waste operations in the Waste Processing Building by demarcating the areas with a bright yellow painted on the floor, between the two existing ramps located near the center of the building on the east and west sides. A similar line is around the reactives magazine along with protective bollards.

**SWMU #8 (Universal Waste Battery Storage Area)**

Universal Waste Battery Storage Area is located in the loading/unload dock 3C. This area is covered by a roof and sloped towards the containment trench.

**SWMU #9 (Paint Can Crushing Area)**

Solvent-based paints are received in one-gallon cans for re-containerization and disposal. The operation takes place in the permitted hazardous waste processing areas. The operation includes manually placing the paint can in the enclosed unit and crushing the can. The paint drains into a 55-gallon drum for off-site transport. The empty crushed paint cans are handled as solid waste. EQ uses best management practices such as using plastic sheeting to contain any drippage. Each waste stream is characterized to determine appropriate management.

**SWMU #10 (Roll-off Storage Area)**

The Roll-off Storage Area is located on the 8<sup>th</sup> Avenue property and is used for the storage of roll-off boxes that are full of the solidified material created in the Solid Waste Processing Facility. The roll-off boxes are staged in this area and are waiting for outbound transportation. The area consists of a 2,288 square foot covered concrete pad and has a capacity of 20,200 gallons. Since no liquids are stored in this area, there is a leachate collection system for secondary purposes.

**SWMU #11 (10-Day Transfer Facility and Inbound & Out Bound Staging Area)**

The 10-Day Transfer Facility is located on the 8<sup>th</sup> Avenue property. The 10-Day Transfer Facility is used to store manifested hazardous waste on site for no longer than ten (10) days as allowed for transfer facilities. It will not be utilized for any waste where EQ is the designated facility on the manifest or originated at the facility where EQ is listed as the generator. Vehicles and trailers parked in this area are marked as a 10-Day vehicle/trailer to avoid being confused with other vehicles/trailers that may also be located in the same vicinity. The 10-day identification tags are clearly visible and include the vehicle/trailer number, manifest document number, start date, destination, container count and total gallons. Transfer facility waste shipments are noted in a separate Transfer Log (operating record). Vehicles/trailers located in this area are parked on a man-made impervious surface and secondary containment is provided if vehicles/trailers are going to be parked in this area for more than 24-hours.

The Inbound & Outbound Staging (I/O) Area is also located on the 8<sup>th</sup> Avenue property and shares the same footprint as the 10-Day Transfer Facility. The I/O Area is only used for inbound loads waiting for unloading and receipt and outbound loads waiting for completed transportation paperwork. Vehicles/trailers in this area are marked as either an inbound load or an outbound load to avoid being confused with other vehicles/trailers that may also be located in the same vicinity. The inbound identification tags are clearly visible and include the vehicle/trailer number, manifest

document number, trip number (if applicable), receipt date, container count and total gallons. The outbound identification tags are also clearly visible and include the trailer number, manifest document number, start date, destination, container count and total gallons. EQ may be either the generator or the designated facility. Inbound waste shipments are noted in a separate Inbound Log (operating record). Outbound waste shipments are noted in a separate Outbound Log (operating record). Vehicles/trailers located in this area are parked on a man-made impervious surface. Secondary containment is provided if vehicles/trailers are going to be parked in this area for more than 24-hours.

**SWMU #12 (Used Oil Facility)**

The Used Oil Facility is located in, and part of, the Container Storage Building (SWMU#1) which is discussed above. SWMU #12 remains active since the proposed Oil-Water Separator System (SWMU #19) was not installed and is being removed from the application. Used oil is consolidated into larger containers prior to off-site disposal/recycling.

**SWMU #13 (Satellite Accumulation Area)**

The Satellite Accumulation Area is located in the Laboratory on the 8<sup>th</sup> Avenue property. The material collected in the satellite accumulation area includes various types of debris associated with container sampling and the containerization of collected samples. Accumulated material is transferred to the Orient Road property for further processing and disposal.

**SWMU #14 (Parts Washer)**

The parts washer is located in the maintenance area on the 8<sup>th</sup> Avenue property. The washer consists of a metal sink fixed to a 30-gallon drum of part cleaning solution. The solution is pumped from the drum into the sink where the parts are washed and cleaned. The solution is drained back into the drum when the cleaning is completed. The solution is reused until it is no longer useful and at that point it is sent off-site for recycling.

**SWMU #15 (Additional Retention Pond)**

The additional Retention Pond is located on the 8<sup>th</sup> Avenue property and collects storm water from the roof of the Waste Processing Building. The retention pond was sized for both the permanent pool volume required and the 1" runoff storage (temporary pool). This SWMU was previously investigated and the results have been submitted to the FDEP in a report entitled: "Sediment Sampling Report 8<sup>th</sup> Avenue Property Stormwater Retention Pond" dated February 29, 2012.

**SWMU #16 (Universal Waste Lamp Storage Area)**

The Universal Waste Lamp Storage Area is located on the Orient Road property. The material is stored in a box van with a storage capacity of 1,104 cubic feet.

**SWMU #17 (Aerosol Can Crushing)**

The aerosol can recycler was scrapped and removed from the site approximately 2 years ago (circa 2010) and has not been replaced. EQ has no immediate plans to re-enter the aerosol can recycling business and this SWMU no longer exists.

**SWMU #18 (Drum Crushing)**

The crushing unit is a Drumbeaters of America crusher, model # DC5000-10. Additional details of the compactor are located in Appendix I. The drum crusher consists of a closed cabinet unit located at the top of the ramp leading into Bay 3. A drum is placed inside the container and a ram is used to crush the drum. The unit contains a grate and collection pan at the bottom to catch any liquid or solid residues from the crushed drum. The residue is managed as a waste. The unit is used

to crush drums and other various RCRA empty metal containers. Crushed drums are sent off-site to a metal recycler.

**SWMU #19 (Oil-Water Separator System)**

The Oil-Waste Separator was not installed and is being removed from the application.

**SWMU #20a through 20d (Bulk Container Storage Area)**

The Bulk Container Storage Area(s) are used for the storage of bulk containers that contain solid (passes the paint filter test) material that has been treated in the hazardous waste treatment tank. The material has been sampled and is waiting on confirmatory analytical results from the off-site laboratory. Bulk Containers pending analytical are marked as Treated Hazardous Waste to avoid being confused with other bulk containers that may also be located in the same vicinity. The Treated Hazardous Waste identification tags are clearly visible and include the start date, Hazbox Tracking number, container number, and container count. The Bulk Container Storage Area is also used for the storage of bulk containers that contain solid (passes the paint filter test) material that has been removed from the treatment tank and has received analytical results that confirms that the waste has been successfully treated and meets all de-characterization and LDR treatment standards. Bulk Containers that have received confirmatory analysis and meet all de-characterization and LDR treatment standards are marked as Treated Non-Hazardous Waste to avoid being confused with other bulk containers boxes that may also be located in the same vicinity. Their identification tags are clearly visible and include the start date, Hazbox Tracking number, container number, and container count. Bulk containers stored in the BCSA are noted in a separate Bulk Container (operating record).

The Bulk Container Storage Area is sloped and drains precipitation away from the storage area and the bulk containers. The bulk containers also have metal rollers for wheels, which elevate the bottom of the container 6 -8 inches above the ground, and protect it from contact with accumulated liquids.

## 9.0 CLOSURE PLAN

### 9.1 General/Applicability

This section outlines closure requirements for both the permitted EQ facility (storage and treatment) and the EQ on-site 10-day Transfer Facility (transporter). The EQ financial assurances will cover the permitted TSD operations as required by 40 CFR 264 Subpart H and the 10-day Transfer Facility. This closure plan has been adopted in accordance with the Code of Federal Regulations, Part 264, Subpart G for the EQ facility:

Facility Name:	EQ Florida, Inc.
EPA ID Number:	FLD 981 932 494
Facility Address:	2002 North Orient Road Tampa, Florida 33619
Facility Telephone:	(813) 623-5302
Facility Contact:	Gene Cieply
Mailing Address:	7202 East Eighth Avenue Tampa, Florida 33619

Storage at the facility occurs in containers only. The maximum storage inventory is as indicated below:

Maximum Storage Inventory Summary

Storage Location	Storage Capacity
Container Storage Building	50,000 Gallons
10-Day Transfer Facility	20,000 Gallons or 100 Cubic Yards
Waste Processing Building	4,400 Gallons
Bulk Container Storage Area	800 Cubic yards

No other RCRA regulated units are located on site.

#### 9.1.1 Waste Characterization

Indicated below is the waste characterization of the various waste streams managed at the treatment/storage and transfer facilities. Actual waste analysis information on the waste materials will be retained on waste profile, supporting lab analytical, QC lab reports, manifests, land ban forms, and the EQ computer database.

##### Flammable Liquids

Physical State:	Liquid
Flash Point:	<140 F
Chemical Composition:	Solvents, paints, thinners, alcohols, fuels, oils, etc.
Other Data:	Facility warehouse storage is in an explosion-proof designed area. Vehicles are placarded and meet all DOT requirements. Disposal is off-site via fuel blending and/or incineration.

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**Oxidizers/Reactives/Flammable Solids**

Physical State: Liquid/Solid/Semi-Solid  
Chemical Composition: Oxidizers – permanganates, nitrates, nitrites, perchlorates, etc.  
Reactives – cyanides, sulfides, and water-reactive metals  
Flammable Solids – water-reactive metals, phosphorous, paint sludges, and solid residues.  
Other Data: Cyanides and sulfides must be kept separate from acids.  
Oxidizers must be kept separate from organics.  
Flammable solid/water reactives must be kept dry and usually immersed in kerosene.  
Disposal is off-site via deactivation or incineration.

**Poisons**

Physical State: Liquid/Solid  
Chemical Composition: Arsenics, carbamates, endrin, lindane, toxaphene, methoxychlor, etc.  
Other Data: May be an inhalation hazard.  
Disposal is off-site via incineration.

**Corrosives**

Physical State: Liquid/Semi-Solid  
PH: Acids – 2.0  
Caustics – 12.5  
Chemical Composition: Acid – hydrochloric, nitric, chromic, phosphoric, sulfuric, etc.  
Alkaline – sodium hydroxide, potassium hydroxide, etc.  
Other Data: Keep acids and caustics separated from each other and do not add water to acids or caustics.  
Disposal is off-site via neutralization. Alternately, some, or all, of the acceptable materials may be treated in the treatment tank in the waste processing building and disposed of at a subtitle D landfill once de-characterized, meets LDRs and passes the PFT.

**Characteristic and Others**

Physical State: Liquid/Solid/Sludge  
Chemical Composition: Listed plating sludges, toxic metals (chrome, lead), D018-43 TC wastes  
Other Data: Disposal is off-site via stabilization and landfill. Alternately, allowable waste codes may be treated in the to-be-constructed treatment tank and disposed of at a subtitle D landfill once de-characterized, meets LDRs and passes the PFT.

## 9.2 Closure Performance Standards

EQ plans to continue operating the EQ permitted facility as long as it is a viable business activity, both economically and environmentally. There are currently no plans to stop waste management activities or close the facility. This Closure Plan is submitted to plan, prepare, and secure financial assurances so that closure can be completed when necessary.

Closure of the EQ facility will be done in a manner that minimizes the need for further care. All hazardous waste and hazardous waste constituents will be properly managed at closure so that post closure care and post closure potential for releases of hazardous waste or hazardous waste constituents are eliminated. The EQ Closure Plan complies with the requirements of 40 CFR 264 Subpart G. It is the intent of this plan to protect human health and the environment from any release of hazardous materials or constituents.

Closure and the closure cost estimate are based upon a third party completely managing and conducting all closure activities.

### 9.3 Final Closure Activities

Final closure activities will include the removal of all hazardous waste and hazardous waste constituents from the facility for shipment to permitted treatment and disposal facilities. Final closure also includes the decontamination of all equipment, the floors inside of the Container Storage Building, the containment sumps, the inside walls of the building (three feet up), and the loading/unloading areas (the paved area from the building to five feet out and the outside of the warehouse dock wall from the ground up to the floor level).

The facility land, office, and decontaminated Container Storage Building will require no post closure care. The facility will then be available for commercial use.

### 9.4 Maximum Waste Inventory

A maximum total of 50,000 gallons of hazardous waste from the Container Storage Building, 20,000 gallons or 100 cubic yards of hazardous waste from 10-day Transfer Facility, 4,400 gallons of hazardous waste from the Waste Processing Building, and 800 cubic yards of waste (400 CY of hazardous waste and 400 CY of non-RCRA waste) will require shipment off-site to treatment or disposal facilities at closure. These quantities are summarized below:

MAXIMUM WASTE INVENTORY

Waste Materials	Container Storage Building Maximum Capacity	10-Day Transfer Maximum Capacity	Waste Processing Building Maximum Capacity	Bulk Container Storage Area Maximum Capacity	Total Combined Maximum Capacity
Flammable Liquids	7,810 Gallons	3,225 Gallons	0 Gallons	0 Gallons	11,035 Gallons
Oxidizers	6,655 Gallons	825 Gallons	0 Gallons	0 Gallons	7,480 Gallons
Reactives & Flammable Solids	2,370 Gallons	825 Gallons	0 Gallons	0 Gallons	3,195 Gallons
Poisons	6,765 Gallons	2,640 Gallons	0 Gallons	0 Gallons	9,405 Gallons
Corrosives - Alkaline	6,765 Gallons	1,210 Gallons	495 Gallons	0 Gallons	8,470 Gallons
Corrosives - Acid	6,765 Gallons	1,540 Gallons	3,025 Gallons	0 Gallons	11,330 Gallons
Other Hazardous Waste (Liquids)	6,765 Gallons	5,005 Gallons	880 Gallons	0 Gallons	12,650 Gallons
Other Hazardous Waste (Solids)	6,105 Gallons	4,730 Gallons	0 Gallons	0 Gallons	10,835 Gallons
Treated Hazardous Waste (Bulk Containers)	0 Cubic Yards	0 Cubic Yards	0 Cubic Yards	800 Cubic Yards	800 Cubic Yards
<b>Inventory Totals (Gallons)</b>	<b>50,000 Gallons</b>	<b>20,000 Gallons</b>	<b>4,400 Gallons</b>	<b>0 Gallons</b>	<b>74,400 Gallons</b>
<b>Inventory Totals (Cubic Yards)</b>	<b>0 Cubic Yards</b>	<b>0 Cubic Yards</b>	<b>0 Cubic Yards</b>	<b>800 Cubic Yards</b>	<b>800 Cubic Yards</b>

### 9.5 Closure Items

The facility hazardous waste inventory may be consolidated as much as possible based upon waste hazard class, compatibility, and treatability. Compatible hazardous waste liquids may be pumped to tankers for outbound shipment to ultimate treatment and disposal facilities. Compatible hazardous waste solids may be consolidated to bulk containers for outbound shipment to ultimate treatment and disposal facilities.

#### 9.5.1 Waste Inventory

##### Flammable Liquids

All flammable liquids on hand at the time of closure will be removed and transported to a permitted fuel blending facility (or equivalent). A maximum total (from TSDF and transfer operations combined) of 11,035 gallons of waste flammable liquids would be on hand at closure. The 11,035 gallons would be transported by a permitted hazardous waste transporter. Removal would take a maximum of twenty (20) days.

### **Oxidizers**

All oxidizers on hand at the time of closure will be removed and transported to a permitted ~~sent~~ hazardous waste treatment and disposal facility. A maximum total (from TSDF and transfer operations combined) of 7,480 gallons of oxidizers would be on hand at closure. The 7,480 gallons of oxidizers would be transported by a permitted hazardous waste transporter. Removal would take a maximum of twenty (20) days.

### **Flammable Solids/Reactives**

All flammable solids and reactive wastes on hand at the time of closure will be removed and transported to a permitted hazardous waste treatment facility or incinerator (or equivalent) for disposal. A maximum total (from TSDF and transfer operations combined) of 3,195 gallons would be on hand at closure. The 3,195 gallons would be transported by a permitted hazardous waste transporter. Removal would take a maximum of ten (10) days.

### **Poisons**

All poisonous hazardous waste on hand at the time of closure will be removed and transported to a permitted incinerator (or equivalent). A maximum total (from TSDF and transfer operations combined) of 9,405 gallons of poisons would be on hand at closure. The 9,405 gallons would be transported by a permitted hazardous waste transporter. Removal would take a maximum of twenty (20) days.

### **Corrosives**

All corrosive hazardous waste on hand at the time of closure will be removed and transported to a permitted treatment facility (or equivalent) for treatment and disposal. A maximum total (from TSDF and transfer operations combined) of 20,290 gallons of corrosives would be on hand at closure. The 20,290 gallons of corrosives would be sent to a designated treatment facility. The shipment would be transported by a permitted hazardous waste transporter. Removal would take a maximum of forty (40) days.

### **Other Hazardous Waste**

All other hazardous wastes on hand at the time of closure (such as listed plating sludges, toxic metals, and characteristic D002, D004-011, and D018-043 TC wastes) would be removed and transported to a permitted hazardous waste treatment/disposal facility (or equivalent) for treatment or incineration (or equivalent) and disposal. A maximum total (from TSDF and transfer operations combined) of 23,595 gallons and 400 cubic yards of characteristic waste would be on hand at closure. The 23,595 gallons of characteristic wastes would be sent to the designated treatment/disposal facility. The 400 cubic yards of characteristic wastes would be sent to the designated treatment/disposal facility. The shipments would be transported by permitted hazardous waste transporters. Removal would take a maximum of ten (10).

#### **9.5.2 Other Items**

##### **Empty Containers**

All empty containers resulting from the bulking of material will be sent to a drum recycling facility or metal reclamation facility. These facilities will pick up the empties at the EQ site at no charge.

These empty containers will not meet the criteria for classification as an acutely toxic waste and therefore will not require triple rinsing.

Any empty containers from acutely toxic waste will be managed as hazardous waste or triple rinsed with resulting rinses managed as hazardous waste.

There will be no additional cost to EQ for the recycling of non-acutely toxic empty containers and therefore no change in the closure cost estimate.

### **Equipment**

Most of the equipment necessary for decontamination and closure will already be owned by EQ. Equipment which may require decontamination includes a forklift, a compactor, a paint can processor, and an industrial shredder.

## **9.6 Decontamination**

The EQ Container Storage Building is totally enclosed. The facility construction is concrete and concrete block with containment. The transfer loading and unloading area is concrete and paved with sloped and diked containment. Loading and unloading of waste is direct from trailer to warehouse and direct from warehouse to trailer.

Soil sampling will be performed at locations around the site. One soil sample will be taken from the stormwater retention pond (SWMU 3). Unless there is direct knowledge or evidence that a release occurred from the container storage area into SWMU#3, then such contamination, if reported as present, could be from other on-site sources. If this is the case, any contamination that is discovered would be done under HSWA corrective actions rather than under closure of the container storage area. Further, any assessment and clean up would follow the requirements of Chapter 62-780, F.A.C.

In the unlikely event that releases of hazardous waste or hazardous waste constituents were to occur by the facility, the most likely path of migration would be the stormwater system. The inclusion of two additional soil samples allows an up gradient sample from the northeast corner of the facility and a downgradient sample from the southeast corner of the facility to be investigated beyond the stormwater retention area. A soil sample from under the building will also be taken. Additional soil samples will be taken in any area with visual evidence of contamination. Soil samples will also be taken under buildings or in sumps if there are visible cracks or indications that contamination could have migrated into soils and/or groundwater.

All process equipment will be cleaned with water, solvent or both and the resultant liquid sent to a permitted hazardous waste treatment/disposal facility. The floors and sumps will then be decontaminated by steam cleaning. The facility warehouse inner walls will be decontaminated three feet up from the floor. The loading/unloading area will be decontaminated. The loading/unloading area to be decontaminated includes the dock exterior wall from the ground up to the warehouse floor level and the paved ground from the building to out five feet. This liquid will be analyzed for organic solvents and TCLP constituents to determine its acceptability for disposal.

All decontamination will be done and certified by outside contractors. Samples of rinse waters will be taken and analyzed to confirm all washed areas as sufficiently decontaminated.

It is estimated that no more than four weeks will be required to fully decontaminate all equipment and the storage facility itself.

Additional details regarding closure and decontamination activities at the waste processing building are provided in Volume 3 of 3.



Equipment decontamination will be performed on the paint can processor, compactor and forklift. All other equipment is small enough that it could be drummed up and managed as hazardous waste (worst case) if necessary.

Three shallow, surface soil samples will be obtained and analyzed. The main sample will be from the retention pond. The FDEP (HSWA permit) has confirmed that confirmatory sampling and analysis of only the retention pond is sufficient from a SWMU and HSWA permit standpoint. Up gradient, downgradient and quality control samples will be taken and analyzed also for a total of four samples.

Analysis includes full TCLP, 624, 8240, and 8260. This covers all characteristic waste as well as many solvents.

### 9.6.1 Closure Certification

Closure certification (as well as all other closure activities) will be conducted by an independent third party.

An independent registered professional engineer licensed in the State of Florida will certify closure of the EQ hazardous waste facility. It is anticipated that three on-site inspections by the registered professional engineer will occur during the closure period. Those inspections are indicated below:

- First Inspection: Final date of waste acceptance
- Second Inspection: Upon completion of all removal for off-site disposal
- Third Inspection: Upon completion of all decontamination and FDEP inspection.

It is the intent of these inspections to ensure that all materials are being handled in accordance with our Closure Plan. 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 DEP. This certification will be sent within 60 days of completion of closure by registered mail.

## 9.7 Closure Cost Estimate (Container Storage Building)

Indicated below is the most recent closure cost estimate for the TSDF operation based upon the maximum quantities indicated in the Closure Plan and the methods indicated for treatment and/or disposal.

CONTAINER STORAGE BUILDING CLOSURE COST

Waste Materials	Disposal Volume	Units	Disposal Cost	Units	Cost Estimate
Flammable Liquids	142	Drum	\$107	Drum	\$15,194
Oxidizers	121	Drum	\$261	Drum	\$31,581
Reactives & Flammable Solids	44	Drum	\$407	Drum	\$17,908
Poisons	123	Drum	\$315	Drum	\$38,745
Corrosives - Alkaline	123	Drum	\$151	Drum	\$18,573
Corrosive - Acid	123	Drum	\$161	Drum	\$19,803
Other Hazardous Waste (Liquids)	123	Drum	\$138	Drum	\$16,974
Other Hazardous Waste (Solids)	110	Drum	\$138	Drum	\$15,180
Other Hazardous Waste (Roll-Offs)	0	Ton	\$87	Ton	\$0
Treated Non-Hazardous Waste (Roll-Offs)	0	Ton	\$23	Ton	\$0
Subtotal For Container Storage Building =					\$173,958

## 9.8 Closure Cost Estimate (10-Day Transfer Facility)

Indicated below is the most recent closure cost estimate for the 10- Day Transfer Facility based upon the maximum quantities indicated in the Closure Plan and the methods indicated for treatment and/or disposal.

10-DAY TRANSFER FACILITY CLOSURE COST

Waste Materials	Disposal Volume	Units	Disposal Cost	Units	Cost Estimate
Flammable Liquids	59	Drum	\$107	Drum	\$6,313
Oxidizers	15	Drum	\$261	Drum	\$3,915
Reactives & Flammable Solids	15	Drum	\$407	Drum	\$6,105
Poisons	48	Drum	\$315	Drum	\$15,120
Corrosives - Alkaline	22	Drum	\$151	Drum	\$3,322
Corrosive - Acid	28	Drum	\$161	Drum	\$4,508
Other Hazardous Waste (Liquids)	90	Drum	\$138	Drum	\$12,420
Other Hazardous Waste (Solids)	86	Drum	\$138	Drum	\$11,868
Other Hazardous Waste (Roll-Offs)	0	Ton	\$87	Ton	\$0.00
Treated Non-Hazardous Waste (Roll-Offs)	0	Ton	\$23	Ton	\$0.00
Subtotal For 10-Day Transfer Facility =					\$63,571

Treatment and disposal costs for both the TSDF and Transfer Operations are based on actuals charged by various disposal contractors used by EQ during 2015.

## 9.9 Closure Cost Estimate (Waste Processing Building)

Closure of the Waste Processing Building would consist of removal of 4,4000 gallons of hazardous waste, the hazardous waste treatment tank, the reactives magazine, remaining reagents used for hazardous waste treatment, the shredder and the solid waste treatment unit. Costs for removal of the shredder and solid waste treatment unit are provided in the solid waste permit renewal application (Volume 3 of 3). The costs presented below relate more directly to closure of the hazardous waste side of the Waste Processing Building and general clean-up of the building itself.

The maximum cost for closure of the hazardous waste treatment tank would occur if the tank were filled with material to be treated, or that had been partially treated, at shutdown. In this case the contents would be removed and placed back into appropriate containers for off-site disposal. No additional cost for treatment of this material has been assumed in this case because the disposal volume has already been accounted for in either the TSDF or Transfer Operations Closure presented in Sections 9.7 and 9.8. The only additional cost would be the time to empty the contents of the tank. Rinsate costs are based on assumption of generating 0.5 gallons per square foot. Labor hours are based on cleaning 225 square feet per hour at a rate of \$40 per hour.

Coincidentally with removing the contents of the tank, the remaining materials to be disposed of at closure of the treatment building would be any reagents being stored for use in treatment of the characteristically hazardous waste. A total of 40 tons was assumed for closure cost estimating and the unit price for transportation and disposal is currently \$26 per ton.

After removal of the contents, closure of the treatment tank would consist of a high pressure steam rinse with collection of the accumulated rinsate and any sediment into containers for analysis to determine ultimate disposal requirements. Because of the waste codes treated in the tank, analyses would be need only for corrosives (D002) and the metals (D004-D011). The tank will be allowed to air dry and then will be cut into manageable sections and be shipped off site for recycling as scrap metal. In this instance, the material would not be considered a solid waste under RCRA and would fall under the scrap metal exemption in 261.4(a)(13).

Once the tank is removed, the reactivities magazine will be decontaminated and the floor of the waste processing building, including sumps, will be steam cleaned and the rinsate collected for proper disposal. Cleaning and decontamination of miscellaneous equipment will also occur at this time.

The Waste Processing Building consists of a concrete slab approximately 8-in thick. No provisions have been made in the closure cost estimate for sampling of soils to determine if there has been a release to the subsurface. Further, no estimates have been provided for additional cleaning and potential removal of the upper surface of the slab and treatment of the resulting debris. At closure, the FDEP will be requested to tour the treatment building and make a joint determination with EQ as to whether soil sampling or concrete cleaning will be required based on evidence of spills, cracks in the slab, or other means by which the slab has been compromised and would justify subgrade soil sampling. Should such testing be required, the funding set aside for contingency provided in Section 9.10 will be available for this purpose. Pending the outcome of this inspection, a closure certification will be provided by a registered professional engineer.

**WASTE PROCESSING BUILDING CLOSURE COST**

Waste Materials	Disposal Volume	Units	Disposal Cost	Units	Cost Estimate
Flammable Liquids	0	Drum	\$107	Drum	\$0
Oxidizers	0	Drum	\$374	Drum	\$0
Reactives & Flammable Solids	0	Drum	\$426	Drum	\$0
Poisons	0	Drum	\$315	Drum	\$0
Corrosives - Alkaline	9	Drum	\$151	Drum	\$1,359
Corrosive - Acid	55	Drum	\$161	Drum	\$8,855
Other Hazardous Waste (Liquids)	16	Drum	\$138	Drum	\$2,208
Other Hazardous Waste (Solids)	0	Drum	\$138	Drum	\$0
Other Hazardous Waste (Roll-Offs)	0	Ton	\$87	Ton	\$0
Treated Non-Hazardous Waste (Roll-Offs)	0	Ton	\$23	Ton	\$0
<b>Subtotal For Waste Processing Building =</b>					<b>\$12,422</b>

**WASTE PROCESSING BUILDING DECONTAMINATION CLOSURE COST**

Item	Quantity	Unit	Rate	Cost
Disposal of Unused Reagents (Transportation & Disposal)	40	Ton	\$26	\$1,040
Remove Contents of Treatment Tank (9000 Gallons)	2	Hour	\$40	\$80
Steam Clean Treatment Tank (Inside & Out)-1152 Sq. Ft. and Pump Out Rinsate	6	Hour	\$40	\$240
Dismantle Tank for Scrap/Recycling (4-Man Crew)	32	Hour	\$100	\$3,200
264 Sq. Ft.(Floor, Roof & Inside)	2	Hour	\$40	\$80
8,050 Sq. Ft. Floor and Sumps	26	Hour	\$40	\$1,040
Pumps, Filters, Hand Trucks	4	Hour	\$40	\$160
Rinsate Disposal/Treatment	4733	Gallon	\$0.69	\$3,266
Misc. Equipment Rental	2	Day	\$200	\$400
Mobilization and Demobilization	2	Day	\$1,850	\$3,700
Closure Certification	1	Each	\$1,500	\$1,500
<b>Subtotal for WPB Decontamination =</b>				<b>\$14,706</b>

### 9.10 Closure Cost Estimate (Bulk Container Storage Area)

Indicated below is the most recent closure cost estimate for the Bulk Container Storage Area based upon the maximum quantities indicated in the Closure Plan and the methods indicated for treatment and/or disposal.

**BULK CONTAINER STORAGE AREA CLOSURE COST**

Waste Materials	Disposal Volume	Units	Disposal Cost	Units	Cost Estimate
Flammable Liquids	0	Drum	\$107	Drum	\$0
Oxidizers	0	Drum	\$374	Drum	\$0
Reactives & Flammable Solids	0	Drum	\$426	Drum	\$0
Poisons	0	Drum	\$315	Drum	\$0
Corrosives - Alkaline	0	Drum	\$151	Drum	\$0
Corrosive - Acid	0	Drum	\$161	Drum	\$0
Other Hazardous Waste (Liquids)	0	Drum	\$138	Drum	\$0
Other Hazardous Waste (Solids)	0	Drum	\$138	Drum	\$0
Other Hazardous Waste (Roll-Offs)	800	Ton	\$87	Ton	\$69,520
<b>Subtotal For Bulk Container Storage Area =</b>					<b>\$69,520</b>

## 9.11 Transportation

Transportation was considered in the closure cost calculations to keep incompatible hazard class loads separate as follows:

**TRANSPORTATION**

Waste Materials	Disposal Volume	Units	Loads	Cost	Total Cost
Flammable Liquids	201	Drum	3	\$2,400	\$6,030
Oxidizers	136	Drum	2	\$2,400	\$4,080
Reactives & Flammable Solids	59	Drum	1	\$2,400	\$1,770
Poisons	171	Drum	2	\$2,400	\$5,130
Corrosives - Alkaline	154	Drum	2	\$2,700	\$5,198
Corrosive - Acid	206	Drum	3	\$2,700	\$6,953
Other Hazardous Waste (Liquids)	229	Drum	3	\$2,700	\$7,729
Other Hazardous Waste (Solids)	196	Drum	2	\$2,700	\$6,615
Other Hazardous Waste (Roll-Offs)	800	Cubic Yards	40	\$5,000	\$200,000
<b>Subtotal for Transportation =</b>					<b>\$243,504</b>

## 9.12 Closure Cost Estimate (Combined Operations)

A summary of the closure cost for the combined operations is provided below. These costs assume a 10% contingency which is considered an adequate, industry standard, for unanticipated closure activities.

**TOTAL CLOSURE COST**

Container Storage Building =	\$173,958
10-Day Transfer Facility =	\$63,571
Waste Processing Building =	\$12,422
Bulk Container Storage Area =	\$69,520
Waste Processing Building Decon =	\$14,706
Transportation =	\$243,504
<b>Subtotal =</b>	<b>\$577,681</b>
Contingency @ 10% =	\$57,768
<b>Total Closure Cost =</b>	<b>\$635,449</b>

## 9.13 Financial Assurance

Total cost of Closure for the Combined Operations is estimated to be \$635,449. The current Letter of Credit of \$290,996, dated February 17, 2016, is less than the Combined Closure Cost Estimate.

EQ, a division of EQ Holding Company, will meet its financial assurance requirements under 40 CFR 264.143 Subpart H Letter of credit guaranteeing payment into a closure trust fund. Requisite insurance documentation and a Letter of Credit in favor of the State of Florida will be issued upon the Department's review and acceptance of the facility closure cost estimate provided in Section 11.10. This information will demonstrate compliance with Rule 62-730.300(2)(b), Florida Administrative Code (F.A.C.) and 40 CFR Part 264 Subpart H as adopted by reference in Rule 62-730.180, F.A.C.

After initial submission of financial information, annual updates will be provided after the close of each succeeding fiscal year. Updated information will consist of the following:

1. An inflationary increase in the Letter of Credit held for facility closure.
2. A copy of the current Standby Trust Fund Agreement.
3. A copy of the current Certificate of Liability Insurance.

#### **9.14 Schedule for Final Closure**

EQ plans to continue operating the EQ permitted facility as long as it is a viable business activity, both economically and environmentally. There are currently no plans to stop waste management activities or close the facility. The schedule for final closure is listed below in the event closure is necessary.

EQ will notify the FDEP in writing at least 45 days prior to the date on which final closure is expected to begin. This date (beginning of final closure) will be no more than 30 days after the receipt of the final volume of hazardous waste.

Indicated below is a list of tasks for final closure of the EQ storage/treatment facility. These tasks will be performed within a schedule of 90 days from beginning closure activities.

1. Final Waste Acceptance	15 Days
2. Processing Complete	21 Days
3. Offsite Disposal Shipments Complete	30 Days
4. Facility Decontamination Complete	45 Days
5. Soil Sampling and Analysis Complete	60 Days
7. Closure Certification	89 Days
8. Final Date of Facility Closure	90 Days
<b><i>Total time required to close facility</i></b>	<b><i>90 Days</i></b>

All hazardous wastes will be removed within 90 days of receiving the final volume of hazardous waste. All closure activities will be complete within 180 days of receiving the final volume of hazardous waste.

#### **9.15 Certificate of Closure**

Prior to the implementation of the closure plan, EQ will meet with FDEP to discuss the details of the closure plan. Based upon new regulations and/or guidance or policy issues, the plan may need to be amended and/or updated prior to its implementation.

Within 60 days of the closure of each hazardous waste unit and within 60 days of the final closure of the facility, EQ will submit to the FDEP, by registered mail, a certification that the facility has been closed in accordance with the EQ Closure Plan. The certification will be signed by the owner or operator and by an independent registered professional engineer. Documentation supporting the closure certification will be included in this submittal.

The EQ facility has no disposal units. Therefore, no survey or post closure care is required.

The EQ Closure Plan will be amended as per the requirements of 40 CFR 264 Subpart G if amendments are necessary.

## **10.0 USE AND MANAGEMENT OF CONTAINERS**

### **10.1 Condition of Containers**

All hazardous waste containers are inspected by an EQ driver or subcontract transporter prior to removal from the generator's site. The containers are checked for compliance with DOT (or other applicable) regulations. Containers are specifically checked for container and waste compatibility, container integrity, excess rust, excess corrosion, excess dents or defects, leakage, closure, labels, and proper shipping documents. All storage containers will comply with 40 CFR 264, Subpart I requirements. Unacceptable containers will be corrected at the generator's site. These corrections include things such as relabeling a container or tightening the closure. Unacceptable containers can be overpacked or the materials can be transferred to a new or acceptable container. Unacceptable containers, not resolved to EQ satisfaction, will be left at the generator's site.

Containers are double checked for the same problems and conditions upon receipt at the EQ facility. The same corrections or actions occur at the EQ facility except unacceptable containers will be rejected and returned to the generator.

### **10.2 Compatibility of Waste with Containers**

EQ will use containers made of or lined with materials, which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. Chemical compatibility of the wastes with the containers will be in accordance with DOT regulations specified by 49 CFR. The DOT lists standards for containers made of steel, aluminum, metal (other than steel or aluminum), plywood, fiber, plastic, wood, natural wood, reconstituted wood, fiberboard, woven plastic, plastic film, textile, paper, composite with plastic liner, and composite with glass, porcelain, or stoneware liners.

EQ utilizes many of these types of containers. The most common container types utilized are steel, plastic, fiber, and woven fiber. Most of the waste managed by EQ is in 55-gallon steel drums. Fiber and woven fiber containers may be used for solid materials. Steel containers are used for nearly all types of waste materials except corrosives. Corrosives may be stored in steel containers if a plastic liner is used or if the corrosives are in lab pack form. Corrosive materials are usually stored in plastic (poly) containers. The container sizes usually range from a 5-gallon pail to one cubic yard totes. Bulk transport containers such as roll-off boxes and tankers are occasionally utilized for outbound or transfer shipments. All bulk tanker storage will be in the improved containment area located in front of Bay 2.

### **10.3 Management of Containers**

All containers at the EQ facility will remain closed. The containers will be opened only when it is necessary to add or remove waste materials for sampling, transfer, or treatment. All containers managed by EQ will be handled to ensure that no damage, rupture, or leakage will occur. Containers will be moved manually, by drum truck, forklift with proper container handling attachment, pallet jack, or suitable means designed or utilized for movement of containers of hazardous waste.

### **10.4 Inspections**

Container storage areas are inspected daily (each operating day) by EQ personnel. The inspector will check for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. Inspection of containers is described in the EQ Inspection Plan provided as Section 5 of this permit renewal.

## 10.5 Containment Design & Operations

### 10.5.1 Base

The EQ container storage building has a containment system designed and built to contain leaks or spills of hazardous waste. The building is 5,866 square feet (MOL) and features a floor, which is five inches of 4,000 PSI concrete placed monolithically with 6x6, 10/10 wire mesh woven throughout. The base is free of gaps and cracks. The floor has been coated with a chemical resistant sealant and two layers of chemical resistant polyurethane coating. The specifications and manufacturer's information on the coating material are included in Appendix I. All floors and containments in the container storage building are built and coated to these specifications. The floors, sumps, and coatings are compatible with the materials stored in the building. The floors and sumps with coatings are impervious to contain leaks or spills.

### 10.5.2 Slope and Drainage

The building is divided into 3 (three) separate bays. An eight-inch wide concrete block wall separates each bay. The walls extend from the floor to the roof and are designed with a minimum fire resistance of 4 (four) hours. Bays 1 (north) and 3 (south) are for general storage (non-flammable) of hazardous waste. Bay 2 (center) is for the storage of flammable and reactive waste. Bays 1 and 3 have dimensions of approximately 48 feet by 50 feet. Bays 1 and 3 are each subdivided into two equal sections of approximately 24 feet by 50 feet. Each equal subdivided section of Bays 1 and 3 has its own containment sump (one sump each section, or two sumps each bay). Bay 2 is in the center of the building approximately half the size of Bays 1 and 3. The dimensions of Bay 2 are approximately 22 feet by 50 feet. Bay 2 has a separate containment sump giving the entire building a total of five separate equal size containment sumps. The floors of Bay 2 and the floors of each of the subdivided sections of Bays 1 and 3 slope 1/8 inch per foot to the central containment sumps. This ensures that any liquids resulting from leaks or spills will be directed to a central containment sump. Each containment sump is available to contain spills or leaks of different hazard class materials. This prevents the potential for incompatible materials to spill or leak into the same containment sump. No container will be more than 25 feet from a containment sump. The EQ container storage building is located completely under roof (complete with 10-foot overhang and 50-foot roof extension) and there is no potential of accumulation of precipitation in the building. The containment sumps and container storage areas are shown on **Figure 14** and the as-built record drawings for the hazardous waste/management building included in Appendix D (Volume 2 of 3).

The asphalt parking lot area (**Figure 16**) where the BSCAs will be located is sloped (**Figure 13**) and drains precipitation away from the storage area and the stored bulk containers. The bottom of the bulk containers are elevated 6 -8 inches above the ground, and are protected from contact with any liquids (precipitation, stormwater runoff) that may accumulate.



### 10.5.3 Capacity

The five (5) Container Storage Building containment sumps are of identical (MOL) rectangular dimensions of 8.5 feet (length) by 3.5 feet (width) by 4.5 feet (depth). The containment volume of each sump and the Improved Secondary Containment Area located in front of Bay 2 are calculated below:

Containment Area	Containment Calculations (L x W x H x 7.48 Gallons/Cubic Foot)	Total Volume (Gallons)
CSB Sumps (Total 5)	$(8.5' \times 3.5' \times 4.5' \times 7.48) \times 5$	5,007
ISCA #1	$(46' \times 25.41' \times 1.16' \times 7.48) / 2$	5,071
ISCA #2	$46' \times 19.33' \times 0.59' \times 7.48$	3,924
ISCA Area #3	$(46' \times 19.33' \times 1.16' \times 7.48) / 2$	3,858
<b>Total Containment Capacity</b>		<b>17,860</b>

The calculated containment volume of the SCB sumps is approximately 5,007 gallons. The EQ facility capacity of hazardous waste is 50,000 gallons. The containment capacity of the five sumps alone exceeds the required 10% containment of the maximum quantity of hazardous waste, which may potentially be on site at any time. The total containment capacity provided is 17,860 gallons, which is more than triple the containment capacity needed.

The EQ facility containment is actually much greater if the following considerations are taken. Approximately one-fifth of the containers managed are lab packs (mostly exempt household waste). The lab pack containers contain a maximum of 20 gallons of hazardous waste per container. The remaining (non-lab packed) containers are approximately half with free liquids and half with no free liquids. The slope of the floors would also provide additional containment in an emergency. There is an approximate total of 3 inches of slope to each of the five containment sumps. The actual containment of the facility would actually far exceed the minimum required 10% when all these other conditions are considered. Containers without free liquids and lab packs (counted as 55 gallons instead of the actual 20-gallon maximum) have been included in the containment calculation to provide a worst case scenario. For the purposes of storage capacity, the actual quantity of liquids being stored will always be less than the permitted capacity.

The 8,050 sq. ft. Waste Processing Building has a total storage capacity of 173,532 gallons. The entire WPB is surrounded by a concrete curb. The slab in the north side of the building is sloped towards the center of the north side, which directs liquids towards a 50-gallon subsurface sump in that location. The concrete slab in the southern portion of the building is sloped towards a subsurface sump located near the south side of the building. These sumps allows for more efficient removal of liquids. Liquids accumulated in the sumps, from leakage or spills of containers (if any), will be managed as the waste which caused the leak or spill and be placed into the appropriate treatment/solidification tank (non-hazardous or hazardous), a tanker truck, or other container by suitable means (such as pumping to drums). Spillage of liquids on the hazardous waste side of the operations (southern end of the building) will be routed to the sump in this portion of the building. Spillage of liquids on the non-hazardous side of the operations (northern end of the building) will be primarily routed to the sump in this portion of the building, although some may drain to the sump in the hazardous waste operations area.

The building curbing and subsurface sumps provide 28,015 gallons of containment. This is sufficient to hold 110 percent of the largest container (the 14,064 gallon hazardous waste treatment

tank) or 10 percent (17,353 gallons) of the total volume of waste (173,532 gallons) that can potentially be stored in the Waste Processing Building, whichever is greater.

The BSCAs are sloped and drain precipitation away from the storage area and the stored bulk containers. The stored bulk containers contain only solids (passes the Paint filter Test). The bottom of the bulk containers are elevated 6 -8 inches above the ground, and are protected from contact with any liquids (precipitation, stormwater runoff) that may accumulate. Per 40 CFR 264.175, a containment system is not required for this area.

#### ***10.5.4 Run-On – include all storage areas***

Run-on into the containment system is not possible. The floors to the storage building are approximately four feet above the exterior ground elevation. The storage building is totally enclosed to prevent run-on into the building. The exterior drainage is away from the building.

#### ***10.5.5 Waste Removal – include all storage areas***

Spilled or leaked waste will be removed from the containment sump in as timely a manner as is necessary to prevent overflow of the containment system or a threat to human health or the environment. Where a hazard is imminent or has already occurred, waste removal will be immediate. Wastes will be removed from sumps as soon as possible. Wastes will be removed the same day that waste is discovered in the sump by the daily (or other) inspections. The containment sumps are inspected daily as indicated in the Inspection Plan. All liquids which accumulate in the containment sumps, unless already identified, will be sampled and analyzed in accordance with the Waste Analysis Plan. The accumulated liquids will be pumped into appropriate containers and managed as hazardous waste if required.

### **10.6 Containers without Liquids**

Calculation of the containment capacity of the CSB, WPB, and the ISCA, includes all containers including those without free liquids. This is a conservative approach. The waste materials managed include liquids, sludges, and solids. Solids represent approximately one-third of the waste managed at the facility yet containers of solids (with no free liquids) are counted as liquids and are included in the containment calculation. Should the facility need to test for free liquids, the procedures described in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" US EPA SW 846 (latest edition) will be utilized. The test for free liquids is described in the Waste Analysis Plan of this permit application. The facility is designed and operated such that storage areas are able to drain and remove liquids so that containers do not remain in contact with accumulated liquids.

All wastes (including solids with no free liquids) which include waste codes F020, F021, F022, F023, F026, and F027 will have a containment system as required by 40 CFR 264.175.

### **10.7 Ignitable or Reactive Wastes**

Containers holding ignitable or reactive wastes will be located at least 50 feet from the facility's property line. Ignitable or reactive wastes are described in the Ignitable, Reactive, or Incompatible Wastes section of this permit modification application.

### **10.8 Incompatible Wastes**

The EQ facility incompatible waste requirements and procedures are described in the Ignitable, Reactive, or Incompatible Wastes section of this permit modification application.

### **10.9 Closure**

At closure, all hazardous waste and hazardous waste residues will be removed from the containment systems. All containers, liners, bases, and soil containing or contaminated with hazardous waste (or residues) will be decontaminated or removed. This and the closure cost estimate are described in the Closure Plan, discussed in Section 9.0 of this permit modification application.

## **11.0 ON GROUND TREATMENT TANK SYSTEM**

### **11.1 Design of Treatment Tank System**

As described in the introductory sections, EQ operates an on ground treatment tank system to treat selected characteristic hazardous wastes (waste codes D002 and D004 through D011, and K062). No treated hazardous waste is being proposed for disposal at the facility.

The design of the tank system and/or ancillary equipment is provided in Appendix I (Volume 2 of 3). The tank sits on the covered, concrete slab that forms the foundation of the WPB and is anchored on the north, west and south sides as shown on the design drawings.

The treatment tank dimensions are 20-ft wide x 20-ft long x 4-ft 7-in tall. The tank capacity is approximately 68 cubic yards (CY) but the working volume is approximately 2/3 of that, or between 40-45 CY. This allows adequate freeboard to prevent over topping of the tank due to wave or wind action and precipitation is not considered an issue because the tank is located inside the covered WPB. The WPB is open sided on the west and east. Retractable curtains are installed and used to counteract wind-related impacts when wind becomes an issue during the operation of the treatment unit.

The hazardous waste treatment tank is a custom manufactured piece of equipment, essentially meeting the 40 CFR, Part 264.10 definition of an on-ground tank. The unit is constructed of steel plates that are welded into the shape of a box. The box is 20-ft. wide by 20-ft. long and is 4-ft. 7-in tall. The floor and walls of the box are 3/4-inch and 1/2-inch steel plate, respectively, and the top of the box is open. The connections between the plates are joined together with full penetration welded joints so that the box is liquid-tight and will not allow waste to escape. The design and installation of the on ground treatment tank complies with all the requirements specified in 40 CFR, Subpart J, and the design drawings and specifications for the treatment tank as well as the engineering certification of the design are provided in Appendix I (Volume 2 of 3).

After the tank was constructed, and prior to being placed in operation, the tank system was inspected by an independent, qualified, P.E., for the presence of the following items:

- (1) Weld Breaks
- (2) Punctures
- (3) Scrapes of protective coatings
- (4) Cracks
- (5) Corrosion
- (6) Any other structural damage or inadequate construction/installation

A design and installation certification, in accordance 40CFR 270.11(d), is maintained on file at the facility.

### **11.2 Treatment Description**

Candidate containers of hazardous waste potentially amenable for treatment in the on-ground hazardous waste treatment tank are selected from the current inventory and reviewed by the Operations Manager prior to bench testing in the on-site lab. When the selection process is complete, representative samples of each selected waste stream are collected and forwarded to the on-site lab for bench testing. The bench testing determines waste compatibility and the sequence that the waste and reagents are added to the treatment tank in order to ensure complete treatment. Based on the bench test results, pH monitoring, and established solubility curves, a batch treatment recipe is developed by the QA/QC Chemist and the Operations Manager (or designee).

The approved batch treatment recipe is forwarded to the Waste Processing Building (WPB) Supervisor for processing. All of the selected containers on the batch recipe are verified by the Supervisor, or by a designated WPB staff member under the Supervisor's direct supervision, prior to being placed in the treatment tank. The waste and reagents are placed in the treatment tank as prescribed by the batch recipe and then thoroughly mixed using an excavator. The treatment process is complete when all of the reagents have been added to the waste according to the batch recipe, the material has been mixed thoroughly, and all free liquids have been removed.

When the treatment is complete, a representative sample of the treated waste is collected and forwarded to the QA/QC Chemist. The QA/QC Chemist conducts a Paint Filter Test in the on-site lab to demonstrate that the waste has no free liquids remaining in the mixture. The remaining sample is then prepared and sent off-site to a NELAP/NELAC certified lab for TCLP and UTS analysis. If the material fails the Paint Filter Test (PFT), additional treatment reagent is added to the mixture to ensure that all free liquids have been removed. The treated waste is then retested as required.

If the material passes the PFT, the batch is removed from the treatment tank and placed into bulk containers (usually 2-4 boxes per batch). A hazardous waste bulk container ID tag is applied to each bulk container in the batch. The ID tag identifies the bulk container as a hazardous waste and includes the accumulation start date, batch #, bulk container #, and the bulk container count (ex., 1 of X, 2 of X, etc.). Each bulk container is moved from the Waste Processing Building and placed into storage. The bulk container storage area is located within the 10-Day Transfer Facility/Inbound & Outbound Staging/Bulk Container Storage Area as identified in **Figure 16** of the application.

When the TCLP and UTS results are received from the off-site lab (usually within 2-business days of sample submittal), the QA/QC Chemist and the Operations Manager (or designee) review the analytical results and determine whether the batch has been decharacterized and meet the Underlying Hazardous Constituent treatment standards. If the results indicate that the batch has failed for either TCLP or UTS treatment standards, the batch and its associated bulk containers maintain their original hazardous waste bulk container ID tags and are placed on the schedule for retreatment. Retreatment usually occurs within 2-business days of analytical receipt. The failed batch bulk containers remain in the storage area until their scheduled retreatment. If both the TCLP and UHC treatment standards are met, no further treatment is required and the treated waste is now identified as Non-RCRA waste. The original hazardous waste bulk container ID tags are removed and replaced with new Non-RCRA bulk container ID tags which identified the accumulation start date, batch #, bulk container #, and the bulk container count (ex., 1 of X, 2 of X, etc.).

The analytical results of treated of non-RCRA waste are sent to the Subtitle D landfill for review and approval per their acceptance requirements. When the acceptance approval is received from the Subtitle D landfill, the non-RCRA waste bulk containers are loaded onto a transportation vehicle, removed from the storage area, and transported to the landfill for disposal. Generally, all non-RCRA waste is removed from the storage area within 10-business days of passing treatment standard testing and being declared non-RCRA waste.

Based on generator knowledge and the Waste Characterization Reports submitted with the in-bound shipments, no organic UHCs are present at the point of generation in the characteristically hazardous metals containing waste received for treatment. Therefore, identification of additional UHCs should not be necessary and the waste will be treated to meet the inorganic constituent concentration UTS's listed in Part 268-Subpart D so that the treated material is rendered non-hazardous and can be decharacterized.

Table 11.1 summarizes the characteristic hazardous wastes to be treated by EQ and the standards to be achieved for decharacterization and meeting the LDRs. It should also be pointed out that the disposal

facility accepting the treated material may require additional testing above and beyond a TCLP test before they will accept the waste. EQ will determine testing requirements for the proposed disposal facility and have the samples analyzed accordingly.

### **11.3 Treatment Process**

In order to decharacterize treated waste and meet the LDR treatment standards, EQ uses the NEURT treatment technology, as defined in 40 CFR 268.42 Table 1, for the treatment of D002 waste and the STABL treatment technology, as defined in 40 CFR 268.42 Table 1, for the treatment of D004 through D011 and K062 waste.

The NEURT treatment technology is described as follows:

Neutralization with the following reagents (or waste reagents) or combination of reagents: (1) Acids; (2) bases; or (3) water (including wastewaters) resulting in a pH greater than 2 but less than 12.5 as measured in the aqueous residuals.

The STABL treatment technology is described as follows:

Stabilization with the following reagents (or waste reagents) or combinations of reagents: (1) Portland cement; or (2) lime/pozzolans (e.g., fly ash and cement kiln dust)—this does not preclude the addition of reagents (e.g., iron salts, silicates, and clays) designed to enhance the set/cure time and/or compressive strength, or to overall reduce the leachability of the metal or inorganic.

### **11.4 Routine Maintenance/Decontamination**

As previously noted in Section 5.0, the hazardous waste treatment tank is inspected daily. Depending on usage rates and quantities of materials treated, the treatment tank will require periodic decontamination. The decontamination consists of a rough brush of the sides and bottom, followed by a high pressure water rinse. Mixing equipment decontamination will be considered when moving from one characteristically hazardous category or group (e.g., metals) to another (e.g., corrosives.) The equipment will receive a rough surface brush followed by a clean water rinse. The decontamination solids and liquids will be containerized and temporarily stored until the next batch of like material is to be treated and it will be added to that batch rather than disposed of in some other fashion. Because each batch of treated material is tested to assure it has been decharacterized and meets LDRs before disposal, it is redundant to also have to test or characterize the decontamination solids and liquids. The internal SOP used by EQ for decontamination is contained in Appendix J (Volume 2 of 3).

**Table 11-1. EQFL Wastes Treated and Standards for Decharacterization/Meeting LDRs**

Waste Code	Constituent	Concentration <sup>1</sup>	Alternative Soil Treatment Standards <sup>2</sup>		Non-Wastewater UTS/TCLP <sup>3</sup>	Other Requirements <sup>4</sup>
			10 x UTS	90% Reduction		
D002	Corrosive	2 ≥ pH ≥ 12.5	Remove/Deactivate Characteristic		DEACT	PFT
D004	Arsenic	5.0	50	-	5.0	PFT
D005	Barium	100.0	210	-	21	PFT
D006	Cadmium	1.0	1.1	-	0.11	PFT
D007	Chromium	5.0	6.0	-	0.60	PFT
D008	Lead	5.0	7.5	-	0.75	PFT
D009	Mercury	0.2	0.25	-	0.025	PFT
D010	Selenium <sup>5</sup>	1.0	57	-	5.7	PFT
D011	Silver <sup>6</sup>	5.0	1.4	-	0.14	PFT
K062	Chromium	0.60	6.0	-	0.60	PFT
K062	Lead	0.75	7.5	-	0.75	PFT
K062	Nickel	NA	NA	-	NA	PFT

Notes:

- 1/ Metals constituents by TCLP (Toxicity Characteristic Leaching Procedure)
- 2/ Alternate Soil Treatment Standards to meet LDRs are 90% removal capped at 10 x UTS (Universal Treatment Standards). Characteristically hazardous metals could be land disposed if they are treated to the concentration shown in the 10 x UTS column. However, EQFLs intent to decharacterize the waste through treatment so that it will no longer meet the characteristic, meets LDRs and can be disposed of in a Subtitle D landfill. The 90% reduction column would depend on the starting concentrations. In order to meet both the LDRs and decharacterize at the same time, the required reduction may need to be >90%.
- 3/ If the starting material is a liquid which is solidified/stabilized, there is a change in treatability group and the non-wastewater UTS Concentration would apply. This is not considered impermissible dilution.
- 4/ EQFL does not intend to dispose of any bulk or noncontainerized treated liquids and will demonstrate the absence of free liquids by analyzing a sample by EPA SW-846 Method 9095B (Paint Filter Test).
- 5/ Selenium will retain its hazardous characteristics if treated only to meet the non-wastewater UTS. Therefore it will require treatment to 1. mg/L TCLP or less in order to be decharacterized and meet LDRs.
- 6/ If silver starting concentration is between 14-50 mg/L, the 90% reduction will meet the LDR and decharacterization. If starting concentration is <14 mg/L, use 10 x UTS which meets LDRs and decharacterization.

## **12.0 FACILITY AIR EMISSIONS REQUIREMENTS**

### **12.1 Introduction**

EQ operates a hazardous waste treatment and storage facility located in Tampa, Florida. The primary operations at the EQ facility are storage and processing of hazardous waste in containers, primarily 55-gallon drums, and treatment of hazardous waste codes D002, D004-D011, and K062 (proposed). A minimum of 10 percent of each waste stream entering the facility is sampled. Some waste is processed (recontainerized or consolidated) into other containers of similar size or larger. Recontainerization operations may also include use of a paint can crusher and a drum crusher/rag compactor. Wastes are primarily shipped out of the facility in 55-gallon drums, although some wastes will be consolidated in roll-off dumpsters or tanker trucks for transport off-site.

The facility currently does not require an air permit. The potential air emissions of volatile organic compounds (VOCs), to include these activities, have been evaluated and are presented herein to provide information that shows levels to be below air permitting requirements. Because this application is not requesting any change in waste codes or quantities, the write up and analysis provided below is still considered accurate and applicable to this evaluation.

### **12.2 Description of Operations**

Waste is received at the facility primarily in 5-gallon drums to 275 gallon totes. The containers are offloaded at the concrete loading/unloading area just outside the Container Storage Building. The containers are moved inside the building and are categorized and stored according to compatible waste type. The following waste type categories are handled at the facility:

1. Ignitable Waste (I)
2. Corrosive Waste (C)
3. Reactive Waste (R)
4. Toxicity Characteristic Waste (E)
5. Acute Hazardous Waste (H)
6. Toxic Waste (T)
7. Non-RCRA Regulated Waste

The containers are inspected and a portion, i.e., a minimum of 10 percent of each waste type received, are sampled and analyzed. Waste types include liquids, solids, sludges, and a variety of lab packs, i.e., waste that is packaged in its original container. Waste handling and associated operations completed at the site include:

- Container Sampling
- Recontainerization
- Container Loading
- Paint Can Processing
- Drum Crushing and Rag Compacting
- Loading to Roll-Offs
- Bulk Tank Loading
- Laboratory Analysis



## 12.3 Potential Air Emissions

### 12.3.1 Volatile Organic Compounds

The facility is currently permitted to handle virtually all types of hazardous waste. The primary VOCs handled at the facility are methyl ethyl ketone (MEK), methanol, xylenes, toluene, and benzene. In order to conservatively estimate emissions, the vapor pressure of acetone was used to represent all potentially evaporative waste at the facility. Acetone has the highest vapor pressure of the evaporative waste managed at the facility. Therefore, for the emission calculations, all evaporative liquid is assumed to contain 100 percent acetone and approximately half of the waste handled at the facility is assumed to contain all VOC. This assumption produces conservative emission estimates because:

1. Assuming that all liquid waste is 100 percent volatile produces emission estimates significantly higher than actually expected, since liquid waste does not contain 100 percent VOC.
2. Because primary VOC constituents have vapor pressures less than acetone, the assumption that all VOC at the facility is acetone is conservative.

Other assumptions made for the emission estimates will also produce conservative results:

1. The effect of the storage building for containment of VOC emissions was not taken into consideration. All evaporation was assumed to occur outdoors to ambient air. Most operations occur within the storage building by the roll up doors.
2. True vapor pressure at a temperature of 90 degrees Fahrenheit (deg F) was assumed for all emission calculations. Mean annual temperatures in the Tampa area for years 1961 through 1998 were approximately 82 deg F. Therefore, assuming a vapor pressure at 90 deg F would result in higher emission estimates on an annual basis.

Potential VOC emissions have been estimated for several operations at the facility. A summary of primary activities at the facility and estimated emissions is included on Table 12-1. Emission calculations for individual operations are included on Tables 12-2 through 12-5.

Total facility emissions were estimated to be just 3.25 tons per year. As mentioned, these emissions are based on conservative assumptions and actual emissions are expected to be much less.

An Offsite Consequence Analysis (OCA) was conducted and models for potential worst case chemical releases for the EQ facility. The results of the OCA are summarized in Section 14

### 12.3.2 Lead

Lead is considered to be the most significant toxic heavy metal constituent handled at the facility. It is estimated that approximately 20 percent of all waste handled contains some quantity of lead. RCRA regulated lead hazardous waste managed usually ranges from 5 to 500 parts per million (ppm) in concentration. Therefore, the amount of lead present at the facility is less than the amount of VOCs present. The vapor pressure of lead in aqueous solution is much lower than VOCs, and, as such, lead emissions are expected to be negligible based on the same conservative assumptions used and emission estimates calculated for VOC emissions.

## **12.4 Regulatory Applicability**

### ***12.4.1 Stationary Sources***

Because the facility handles waste which may contain small amounts of benzene, the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations relating to benzene were analyzed for potential applicability.

#### **40 CFR 60 Subpart A-Standards of Performance for New Stationary Sources**

There are no stationary sources or affected facilities as defined in this section that apply to this permit renewal application.

### ***12.4.2 Pumps in Light Liquid Service***

EQ will utilize pumps to transfer materials within the processing area of the permitted facility. The total use of equipment subject to the requirements of this subpart will not exceed 300 hours per calendar year. Each pump will be inspected visually each calendar week to determine that no indications of leaking liquids from the pump seals are present. Additionally, if an instrument reading of greater than 10,000 ppm is measured the pump will be considered to be leaking. If a leak is detected it will be repaired as soon as practical, not to exceed 15 calendar days. No pump that is known to leak will be used for hazardous waste transfer operations.

#### **40 CFR 61 Subpart J-National Emission Standards for Equipment Leaks (Fugitive Emission Sources) of Benzene**

This subpart applies to sources (i.e., pumps, compressors, pressure relief devices, sampling connections, etc.) which are intended to operate in benzene service. However, "benzene service" refers to facilities with process units that contain equipment in benzene service. A "process unit" is defined under 61.241 as equipment assembled to produce a volatile hazardous air pollutant (VHAP) or its derivatives as intermediates or final products, or equipment assembled to use a VHAP in the production of a product. Because the facility does not produce or manufacture a product, it is not subject to this subpart.

#### **40 CFR 61 Subpart V-National Emission Standards for Equipment Leaks (Fugitive Emission Sources)**

Again, this unit applies to equipment operating in VHAP service, which is part of a process unit. Because the facility does meet the requirements of a process unit (see Section 4.2.1), the facility is not subject to this subpart.

#### **40 CFR 61 Subpart BB-National Emission Standards for Benzene Emissions from Benzene Transfer Operations**

This subpart applies to loading racks at benzene production facilities and bulk terminals only. Therefore, the facility is not subject to this subpart.

#### **40 CFR 61 Subpart FF-Emission Standards for Benzene Waste Operations**

This subpart applies to owners and operators of chemical manufacturing plants, coke byproduct recovery plants, and petroleum refineries, or owners and operators of hazardous waste treatment, storage, and disposal facilities that treat, store, or dispose of hazardous waste generated by any of the affected facilities. Because EQ does not currently accept waste from these facility types, this subpart does not apply.

#### **40 CFR 264 Subpart BB-Emission Standards for Equipment Leaks General**

Compliance with the requirements of 40 CFR 264, Subpart BB will be attained by the following the procedures described in this section. This section requires facilities to identify and repair leaks in specified pieces of equipment. Equipment is considered to be leaking when materials are dripping from pump seals or valves, or when an instrument reading of greater than 10,000 ppm is measured. The detection instrument used for monitoring will meet the performance criteria of Reference Method 21 in 40 CFR Part 60. Equipment used to transfer hazardous waste (with an organic concentration of at least 10 percent by weight) at EQ is used less than 300 hours per calendar year. This equipment is exempt from the requirements of Sections 264.1052 through 264.1060 once identified as required by 264.1050 (e) and (f). EQ uses pumps in light liquid service as identified herein.

##### ***12.4.3 Trucks in Vacuum Service***

EQ will utilize equipment that is in vacuum service. Vacuum trucks are used to transport and transfer hazardous materials.

#### **40 CFR 264 Subpart BB-Emission Standards for Equipment Leaks General**

Compliance with the requirements of 40 CFR 264, Subpart BB will be attained by the following the procedures described in this section. This section requires facilities to identify and repair leaks in specified pieces of equipment. Equipment is considered to be leaking when materials are dripping from pump seals or valves, or when an instrument reading of greater than 10,000 ppm is measured. The detection instrument used for monitoring will meet the performance criteria of Reference Method 21 in 40 CFR Part 60. Equipment used to transfer hazardous waste (with an organic concentration of at least 10 percent by weight) at EQ is used less than 300 hours per calendar year. Equipment in vacuum service is also used. This equipment is exempt from the requirements of Sections 264.1052 through 264.1060 once identified as required by 264.1050 (e) and (f). EQ uses trucks in vacuum service as identified herein.

##### ***12.4.4 Containers***

EQ stores hazardous waste in containers greater than 26 gallons and as such must follow the requirements of 40 CFR 264 Subpart CC. Most of the hazardous waste processed by EQ will have a VOC concentration of greater than 500 parts per million by weight (ppmw). In most cases, hazardous waste that may have a VOC concentration of less than 500 ppmw and will be managed as if it does have a VOC concentration of greater than 500 ppmw. EQ does not have any existing tanks, surface impoundments or hazardous waste stabilization treatment processes and therefore these items are not addressed in this permit renewal.

#### **40 CFR 264 Subpart CC- Air Emission Standards for Tanks, Surface Impoundments, and Containers**

EQ shall control air pollutant emissions from all containers stored or processed at the permitted facility. The transfer of hazardous waste in or out of containers will be accomplished in a manner that minimizes the exposure of hazardous waste to the atmosphere. This will be done to the extent practical, considering the physical properties of the hazardous waste and good engineering practices. Containers having a design capacity of 0.1m<sup>3</sup> - 0.46 m<sup>3</sup> will be managed using U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as a Level 1 control standard. Containers will comply with the requirements of 49 CFR part 178, except as permitted by EQ approved DOT exemption for lab packs managed in accordance with 49 CFR part 178 or combination packages specified in 49 CFR 173.12. Containers having a capacity of greater than 0.46 m<sup>3</sup>, that are in light service, will also comply with these DOT standards, as required, to provide Level 2 control. Containers meeting these standards are designed so that any potential release of VOC concentrations are eliminated with proper care and use. EQ will ensure that containers have secured closure devices (drum lid, tanker lid or equivalent) in place and closed when materials are not being loaded to the container. This will be done within 15 minutes, when the person performing the loading operation leaves the immediate vicinity of the container, or the process generating the material being added to the container shuts down, whichever occurs first. Containers will also be opened as needed to allow access for routine activities other than the transfer of hazardous waste. These activities may include sampling, measurement, inventory, or repackaging. The container will be properly closed and secured immediately following the completion of the activity.

All containers will be inspected for visible cracks, holes, gaps or other spaces into the interior of the container when closed and secured in order to insure that no emission release into the environment will occur. If defects are discovered they will be corrected (repaired, replaced, repacked or over packed) within 24 hours of detection. Section 10, Use and Management of Containers, provides detailed information on inspection practices.

## 12.5 Conclusions

Potential emissions of VOCs have been estimated for operations at the EQ facility. Because the proposed treatment tank will only treat characteristically hazardous wastes (D002 and D004 through D011) and listed hazardous waste (K062 via "lime stabilization") which have low volatilities and do not contain any VOCs, the calculations previously performed by EQ for the facility appear appropriate for the current application. The emission estimates have been prepared based on conservative assumptions. Therefore, the estimated emissions are expected to be far lower than presented herein. These data show that current air emission estimates are below the existing standard of 10 tons per year (TPY). Rule 62-210.300(3)(b), F.A.C. requires a level of greater than 10 TPY for air permitting to be required. These data have been presented to the Hillsborough County Environmental Protection Commission (HCEPC) during prior permit renewals.

## 12.6 Section References

- Environmental Protection Agency, 1987. Hazardous Waste Treatment, Storage, and Disposal Facilities, (TSDf)-Air Emission Models. EPA-450/3-87-026. Section 7.3.1.
- Florida Department of Environmental Protection, 1994a. Letter from Howard L. Rhodes to Angela R. Morrison, May 20, 1994. Title V Insignificant Source Summary-Electric Power Plants.
- Florida Department of Environmental Protection, 1994b. Letter from Howard L. Rhodes to Jose F. Alvarez, October 5, 1994. Title V Insignificant Source Summary-Sugar Cane Industry.
- Florida Department of Environmental Protection, 1994c. Letter from Howard L. Rhodes to Nancy Stephens, January 26, 1994. Title V Insignificant Source Summary-Chemical Industry.
- Weather History at: [http://www.ncdc.noaa.gov/cgi/bin/gsod\\_xmgr](http://www.ncdc.noaa.gov/cgi/bin/gsod_xmgr)

**Table 12-1 Summary of Primary Activities and Estimated Emissions**

Activity Description	Activity Location	Potential Air Emissions	Comments & Assumptions	Reference for Emission Calculations	Estimated VOC Emissions (Tons Per Year)
Closed Container Loading/Unloading	Loading/unloading dock	None	Containers remain closed	NA	NA
Container Sampling	Inside Container Storage Building	Minimal	10% of containers are sampled	Table 13-2	0.0009
Hazardous Waste Treatment	Waste Processing Building				
Emergency Exhaust Fans	Container Storage Building Bay 2	Negligible	Emergency use only	NA	NA
Portable Floor Fans	Container Storage Building Bays 1 and 3	Negligible	Personnel cooling	NA	NA
Roll-off Storage	Bulk Container Storage Areas	Negligible	Covered when in storage	NA	NA
Laboratory Hood Exhaust	8th Avenue Laboratory	Negligible	Exempt Activity (F.A.C. rule)	NA	NA
<b>Recontainerization Operations</b>					
Container to Container	Inside the Container Storage Building	Minimal	Typically pumped or poured; include lab packs	Table 13-3	0.26
Paint Can Crushing	Improved Secondary Containment Area	Minimal	Solvent-based paint	Table 13-6	0.40
Drum Crushing/Rag Compaction	Loading/unloading dock	Negligible	Low use, enclosed unit	NA	NA
Container to Roll-off	Improved Secondary Containment Area	Minimal	Typically solid material	Table 13-4	2.02
Tanker Loading	Loading/unloading dock	Minimal	Liquids Only	Table 13-5	0.577
<b>TOTAL =</b>					<b>3.25</b>

**Table 12-2 Worksheet for Estimating Emissions from Container Sampling**

<b>Calculation Parameters</b>			
<b>Variable</b>	<b>Descriptions</b>	<b>Value</b>	<b>Basis</b>
Po	Atmospheric Pressure, mm Hg	760	Standard Value
MW	Molecular Weight, g/g mol	58.08	Chemical Database
yi*	Equil mole fraction in gas phase ( $x_i \cdot P_i^* / P_o$ )	0.20	Calculated
xi*	Mole fraction in aqueous liquid	0.5	Assumption
Pi*	Component vapor pressure, mm Hg	306	Based on 5.917 psia at 90 deg F
w	Width of dump to wind flow, cm	7.62	Assume 15 feet dumpster length
R	Gas constant, 62,300 mm Hg*cm <sup>3</sup> /gmol*K	62,300	Given
T	Temperature, Deg K	305.4	90 deg F
Di	Diffusivity in air, cm <sup>2</sup> /s	0.124	Chemical Database
l	Length of dumpster in direction of wind flow, cm	7.6	Assume 10 feet dumpster width
U	Wind speed, cm/s	22.35	Assume nominal 1 mph
Fv	Fricks law correction factor (function of yi*)	0.85	From Graph 13-1
<b>Equation:</b>	<b><math>(2)(P_o)(MW)(y_i^*)(w)(R/T) \times ((D_i)(l)(U)(3.14)(F_v))^{0.5}</math></b>	<b>0.02 g/s</b>	<b>Calculated Emission Factor</b>
<b>Operating Data:</b>			
<b>Variable</b>	<b>Descriptions</b>	<b>Value</b>	<b>Basis</b>
NC	Number of containers sampled, containers/yr.	1,560	10% of all containers
t	Typical sampling time. Seconds per container	25	Conservative assumption
<b>Equation:</b>	<b>Calculated Emission Factor x NC x t/454 g/lb.</b>	<b>1.72</b>	<b>Pounds per year</b>
<b>Total Emissions =</b>		<b>0.0009</b>	<b>Tons per year</b>

Assumptions: Conservatively assume that half (by mole fraction) of all liquid waste sampled is acetone.

Source: Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF) - Air Emission Models. EPA-450/3/87-026, December 1987.

**Table 12-3 Worksheet for Estimating Emissions from Drum Loading (Recontainerization)**

<b>Calculation Parameters</b>			
<b>Variable</b>	<b>Descriptions</b>	<b>Value</b>	<b>Basis</b>
S	Saturation Factor	1.45	Based on splash loading
P	True Vapor Pressure of Liquid (psi)	5.917	VP of acetone at 90 deg F
M	Molecular Weight of Vapors (lb/lb-mole)	58.08	MW of acetone
T	Temperature of Bulk Liquid (deg R)	550	90 deg F
<b>Equation:</b>	<b>12.46(S)(P)(M)(T)</b>	<b>11.3 lbs/1,000 gal</b>	<b>Calculated Emission Factor</b>
<b>Operating Data:</b>			
<b>Variable</b>	<b>Descriptions</b>	<b>Value</b>	<b>Basis</b>
Q	Quantity loaded (gal/year)	47,850	Pumping or pouring operations
Pct	Amount of solids in waste loaded (percent)	95	Assumption
<b>Equation:</b>	<b>Calculated emission factor x Q/1,000/2,000 lbs/ton x Pct/100</b>	<b>0.26</b>	<b>Tons per year</b>

Assumptions: Conservatively assume that half (by mole fraction) of all liquid waste recontainerized is acetone.  
Source: Compilation of Air Pollutant Factors (AP-42), Section 4.4. EPA, September 1985.

**Table 12-4 Worksheet for Estimating Emissions from Loading Roll-Off Containers**

Calculation Parameters			
Variable	Descriptions	Value	Basis
Po	Atmospheric Pressure, mm Hg	760	Standard Value
MW	Molecular Weight, g/g mol	58.08	Chemical Database
yi*	Equil mole fraction in gas phase ( $x_i \cdot P_i^* / P_o$ )	0.40	Calculated
xi*	Mole fraction in aqueous liquid	1	Assumption
Pi*	Component vapor pressure, mm Hg	306	Based on 5.917 psia at 90 deg F
w	Width of roll-off to wind flow, cm	457.2	Assume 15 feet dumpster length
R	Gas constant, 62,300 mm Hg*cm <sup>3</sup> /gmol*K	62,300	Given
T	Temperature, Deg K	305.4	90 deg F
Di	Diffusivity in air, cm <sup>2</sup> /s	0.124	Chemical Database
l	Length of dumpster in direction of wind flow, cm	304.8	Assume 10 feet dumpster width
U	Wind speed, cm/s	44.7	Assume nominal 1 mph
Fv	Fricks law correction factor (function of yi*)	0.7	From Graph 13-1
Equation:	$(2)(P_o)(MW)(y_i^*)(w)(R/T) \times ((D_i)(l)(U)(3.14)(F_v))^{0.5}$	0.02 g/s	Calculated Emission Factor
Operating Data:			
Variable	Descriptions	Value	Basis
NR	Number of roll-offs loaded, roll-offs/month	1,560	10% of all containers
t	Typical loading time. Hours per roll-off	1.5	Conservative assumption
Pct	Amount of solids in waste loaded (percent)	95	Assumption
Equation:	Calculated emission factor x NR x t x 3,600 s/hr / 454 g/lb x (1-Pct/100)	335.85	Pounds per year

Assumptions: Conservatively assume that half (by mole fraction) of all liquid waste loaded to roll-offs is acetone.  
Source: Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF) - Air Emission Models. EPA-450/3/87-026, December 1987.



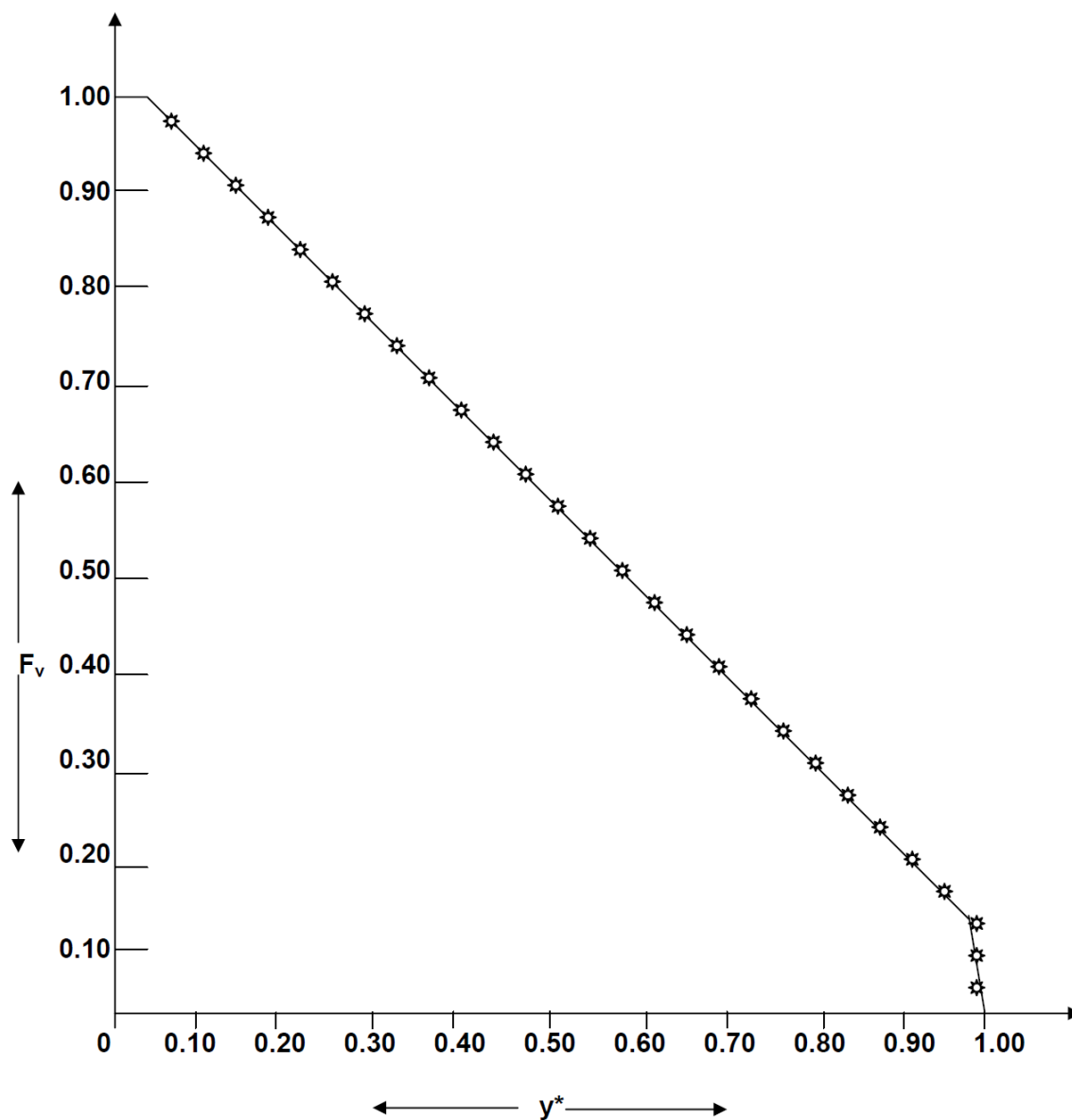
**Table 12-5 Worksheet for Estimating Emissions from Tanker Truck Loading**

<b>Calculation Parameters</b>			
<b>Variable</b>	<b>Descriptions</b>	<b>Value</b>	<b>Basis</b>
S	Saturation Factor	1.45	Based on splash loading
P	True Vapor Pressure of Liquid (psi)	5.917	VP of acetone at 90 deg F
M	Molecular Weight of Vapors (lb/lb-mole)	58.08	MW of acetone
T	Temperature of Bulk Liquid (deg R)	550	90 deg F
<b>Equation:</b>	<b>12.46(S)(P)(M)(T)</b>	<b>11.3 lbs/1,000 gal</b>	<b>Calculated Emission Factor</b>
<b>Operating Data:</b>			
<b>Variable</b>	<b>Descriptions</b>	<b>Value</b>	<b>Basis</b>
Q	Quantity loaded (gal/year)	99,000	Assume 100 drums/tanker; tankers loaded/month (1/2 acetone)
Pct	Amount of solids in waste loaded (percent)	95	Assumption
<b>Equation:</b>	<b>Calculated Emission Factor x Q/1,000/2,000 lbs/ton x Pct/100</b>	<b>0.57</b>	<b>Tons per year</b>

Assumptions: Conservatively assume that half (by mole fraction) of all liquid waste loaded to tanker trucks is acetone.

Source: Compilation of Air Pollutant Factors (AP-42), Section 4.4. EPA, September 1985.

**Graph 12-1 – Fick's law correction factor  $F_v$  as a function of  $y^*$  <sup>31</sup>**



### **13.0 EXPOSURE INFORMATION**

An Offsite Consequence Analysis (OCA) was conducted to determine if the proposed activities represent a substantial modification of the permit. The OCA methodology and results are presented below in a report prepared for EQ by Koogler & Associates.

# 2016 RMP Modeling Final Report

## Toxic Worst-Case Release Scenarios

EQ Florida Inc.

Prepared for  
NOVA Engineering and Environmental, LLC

Tampa, Florida

April 8, 2016

Prepared by:

Koogler & Associates  
4014 N.W. 13<sup>th</sup> Street  
Gainesville, FL 32609

[www.kooglerassociates.com](http://www.kooglerassociates.com)

Project No. 817\_16\_02



**Certification**

I certify that, based upon information and belief formed after reasonable inquiry, the statements and information in the attached documents are true, accurate and complete.

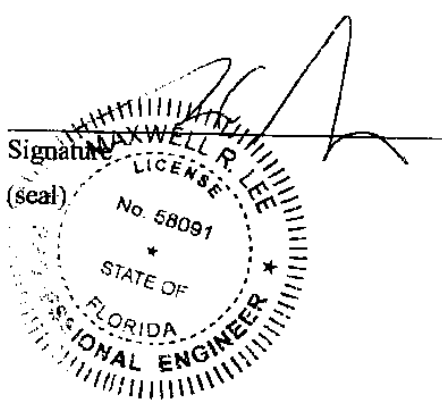
Signature

Max Lee, Ph.D., P.E.  
President of Koogler & Associates Inc.

Name / Title

KA Project 817\_16\_02  
DEP application No. 34875-HO-012

**Professional Engineer Certification**

Professional Engineer Name: <b>Max Lee</b>		
Registration Number: <b>58091</b>		
Professional Engineer Mailing Address...		
Organization/Firm: <b>Koogler and Associates, Inc.</b>		
Street Address: <b>4014 NW 13<sup>th</sup> Street</b>		
City: <b>Gainesville</b>	State: <b>Florida</b>	Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers...		
Telephone: <b>(352) 505 - 8643</b>	ext. <b>19</b>	Fax: <b>(352) 377 - 7158</b>
4. Professional Engineer E-mail Address: <b>mlee@kooglerassociates.com</b>		
5. Professional Engineer Statement:		
<i>I, the undersigned, hereby certify to the best of my knowledge, the data provided are true, accurate, and complete and are based upon reasonable techniques available for EPA RMP accidental release modeling per 40 CFR 68.</i>		
Signature (seal)		Date
		<u>5/18/16</u>

## 1. Offsite Consequence Analysis (OCA)

### a. OCA Process Overview

NOVA Engineering and Environmental, LLC (NOVA) contracted Koogler and Associates, Inc. (Koogler) to conduct modeling for worst-case release OCA of potential chemical releases from the EQ Florida Inc. (EQ) Tampa, Florida facility (see Attachment 1, Building Layout). The modeling is provided for environmental permitting requirements and is conducted per the requirements of Environmental Protection Agency's (EPA) Risk Management Program (RMP) (40 CFR Part 68, Subpart G). EPA guidelines<sup>1</sup> for RMP OCA modeling provide descriptions of the modeling requirements for worst-case releases. The scenarios modeled in this project involve 'worst case' releases of the compounds listed in Table 1 from their respective storage containers. The location of the releases is shown in Attachment 1 at the southern side of the storage building. The modeling was conducted in a two-step modeling sequence to first assess using the conservative modeling of RMPCOMP provided by EPA. For those compounds that RMPCOMP estimated over the distance of 1000 feet, a more accurate model, HGsystem was applied.

**Table 1. Modeled toxic chemicals**

<b>Toxic Chemicals</b>	<b>Weight Fraction</b>	<b>Volume (gal)</b>	<b>Modeling</b>	<b>Toxic Endpoint (ft)</b>
Ammonia (aqueous)	20%	55	RMPCOMP	528
Hydrofluoric acid	12%	55	HGSYSTEM	262
Hydrochloric acid	30%	275	HGSYSTEM	853
Nitric acid	30%	275	HGSYSTEM	1050

These chemicals were modeled to determine the distance to the RMP toxic endpoint for each chemical, after a "worst-case" release into the interior of the storage building.

### b. RMPCOMP model

EPA offers an online version on its website for modeling of RMP chemicals by a simplistic model RMPCOMP. The model is based on the conservative assumptions described in RMP program modeling guidance.<sup>2</sup> The model makes a number of conservative assumptions, while not highly accurate, that provide a reasonable measure of conservatism to assure the modeling result includes the toxic endpoint for the above chemicals. Ammonia was modeled by RMPCOMP to have an end point of only 0.1 miles (RMPCOMP only provides results in increments of 0.1 miles) or 528 ft. which is conservative and within the facility property boundary. The input parameters included a total tank volume of 55 gallons, ammonia weight fraction of 20%, reservoir temperature of 97 °F and does not consider an interior release.

### c. HGSYSTEM Model<sup>3</sup>

HGSYSTEM is short-range distance (less than 50 km) model developed specifically for accidental releases approved and recommended by EPA that can simulate a release of toxic liquid and then disperse the pollutant cloud into the atmosphere after the accidental release. The model contains a number of submodules that one uses in sequence for each step in the initial release to the final toxic endpoint determination.

The initial release was reduced to account for an interior release (see Section i.) based on EPA guidance. The release forms a pool and evaporates based on the chemical properties of the pollutant and the remaining mixture (water). The submodule LPOOL was used to model the pool and its evaporation. The results of the model (file ending in \*.LPR) are provided in Attachment 2.

The dispersion modeling was determined using the submodule, HEGADAST. This module provides time interval dispersion of the plume and its concentration at downwind (centerline) concentrations from the evaporating pool. HEGADAST was set to provide results of the instantaneous cloud concentration data (in units of percent of volume) along the centerline of the cloud plume at 20-meter intervals away from the release. The cloud concentration data at 20-meter distance intervals is calculated for each 200-second time interval following the release. Given the high evaporation properties and the relatively smaller volumes of the modeled chemical releases, the dispersion cloud reaches a maximum distance as the chemicals, without containment, evaporate quickly such that the farthest hourly average toxic endpoint occurs within the first couple of hours.

After HGSYSTEM modeling produces these 200-second interval data, the data are used to calculate the hourly-average concentration of the cloud. Hourly-average concentration data are corrected for the fractional amount of the regulated toxic compound within the cloud at each time interval using data from the LPOOL submodule (file ending in .LPC Attachment 2). Hourly-average concentration data sheets are tabled and provided near the end of Attachment 2 and indicate the resulting farthest distance of the toxic endpoint over 200 second intervals. EPA guidance<sup>4</sup> states:

*“The averaging time is specified as 1 hour to make the model-predicted concentrations comparable to the ERPG (Emergency Response Planning Guideline) concentrations.”*

The toxic endpoint distances were determined as the greatest distance that the toxic endpoint (concentration of chemical in units of  $\mu\text{g}/\text{m}^3$ ) or greater was observed in the cloud plume.

#### **d. EPA MODELING PARAMETERS**

Certain specified input parameters are provided in EPA RMP modeling guidance for worst-case scenarios as required input for RMP modeling. Some



modeling input parameters not specified by EPA have been obtained through literature review, calculated through literature review, or chosen by engineering judgment. These are provided in Attachment 2.

Atmospheric conditions required for modeling are determined using EPA guidance. For example, the worst-case release ambient temperature and humidity applied to the model are determined as highest daily maximum temperature (36 °C (97 °F)) and average humidity (70 percent) for the site (Tampa, FL) during the past three years, per 40 CFR 68.22(c). This same temperature was conservatively applied to the containers of liquid tank. Wind speed is set at 1.5 m/s and atmospheric stability at F class. Surface roughness was determined to be “obstructed terrain” (urban). It is stated in 40 CFR 68.22(e):

*“The owner or operator shall use either urban or rural topography, as appropriate. Urban means that there are many obstacles in the immediate area; obstacles include buildings or trees. Rural means there are no buildings in the immediate area and the terrain is generally flat and unobstructed.”*

#### **i. Interior Building Release**

These releases occur inside the EQ facility building as shown in the Attachment 1 figure. The release of a toxic liquid and the subsequent dispersion plume are impeded by the building for which EPA specifically addresses in guidance.<sup>5</sup> For this modeling, the EPA factor for building mitigation of 0.1 is applied to the release amount. Note that EPA describes the impact of interior releases as more restrictive and therefore use of this factor is considered a conservatively high value resulting in a farther endpoint than suggested by EPA.

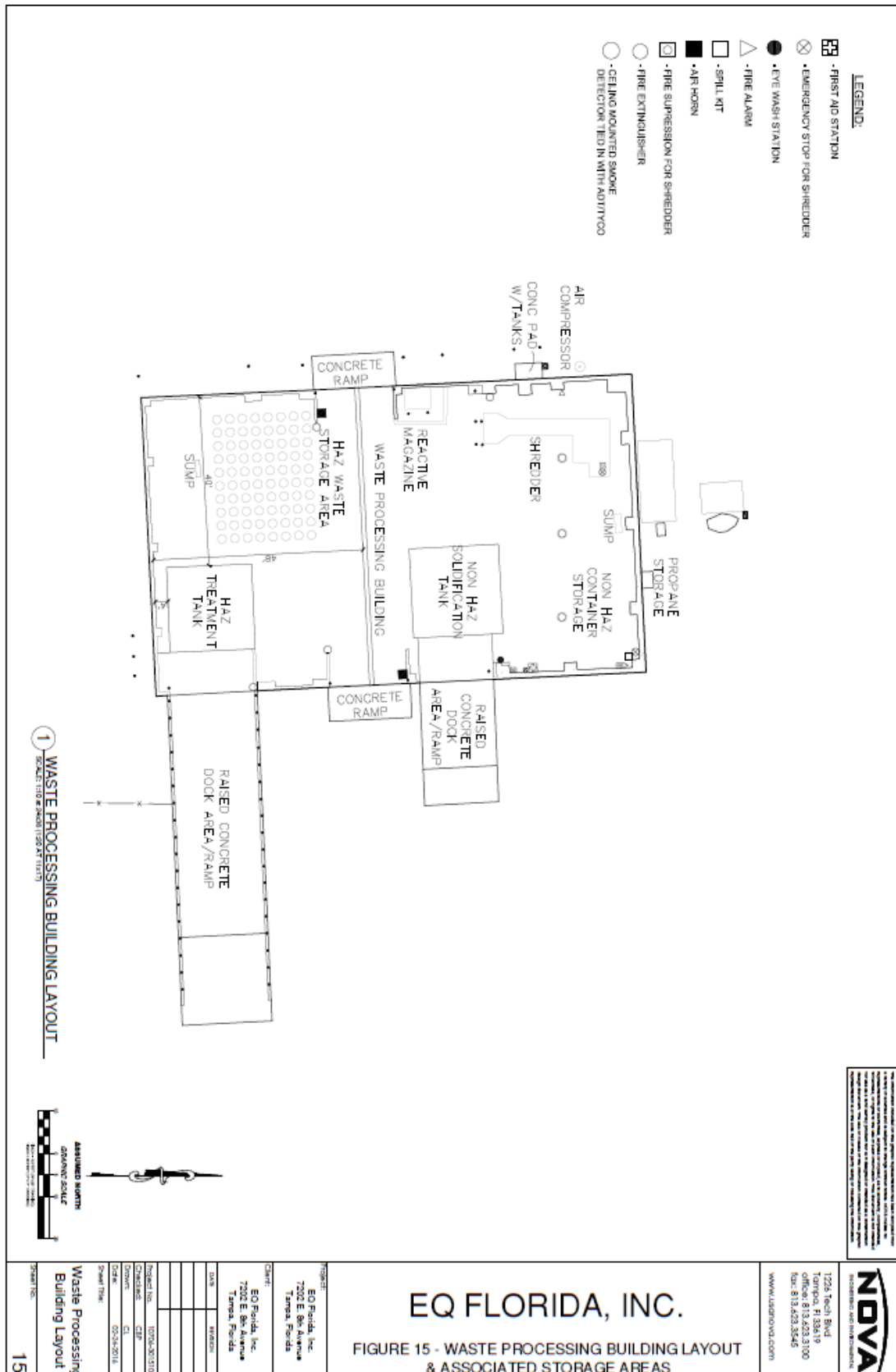
## **2. Conclusion**

The results of RMP worst-case release modeling for the EQ facility have been determined to extend to a maximum distance of 1050 feet from the location of the facility hazardous waste storage area. Additional refinement of the modeling parameters would likely reduce toxic endpoints.

### **3. References**

1. "Risk Management Program Guide for Offsite Consequence Analysis," EPA Doc. No. EPA-550-B-99-009.
2. <https://www.epa.gov/rmp/guidance-facilities-risk-management-programs-rmp>
3. "HGSYSTEM User Manual," Shell Internationale Research Maatschappij BV. The Hague, TNER.94.058, 1994.
4. EPA Doc. No EPA-454/R-93-002, section 5.8.16.
5. <https://www.epa.gov/sites/production/files/2013-11/documents/oca-apds.pdf>, Section 3.2.3

## **ATTACHMENT 1: BUILDING LAYOUT**



## **ATTACHMENT 2: MODELING RESULTS**

**2016-EQ, RMP Modeling**  
**Koogler Project: 817\_16\_02**  
**RISK MANAGEMENT PLANNING, OFF-SITE CONSEQUENCE ANALYSIS**

**SUMMARY OF WORST-CASE RELEASE SCENARIO MODELING**

**HF**

AMOUNT RELEASE		endpoint	
gallons	kg	meters	feet
55	225	<b>80</b>	<b>262</b>

filename: 8171602F

**HCl**

RELEASE		endpoint	
gallons	kg	meters	feet
275	1227	<b>260</b>	<b>853</b>

filename: 8171602C

**HNO3**

RELEASE		endpoint	
gallons	kg	meters	feet
275	1165	<b>320</b>	<b>1050</b>

filename: 8171602B

Chemical	KG/M3	G/M3 = MG/L	MOL. WT.	GMOLE/M3	PPM	%VOL
<b>HF</b>	1.60E-05	0.016	20.01	0.000800	19.550	1.955E-03
<b>HCl</b>	3.00E-05	0.03	36.46	0.000823	20.118	2.012E-03
<b>HNO3</b>	2.60E-05	0.026	63.01	0.000413	10.089	1.009E-03

**2016-EQ, RMP Modeling**  
**Koogler Project: 817\_16\_02**  
**RISK MANAGEMENT PLANNING, OFF-SITE CONSEQUENCE ANALYSIS**

**CHEMICAL PARAMETERS**

**HYDROFLUORIC ACID (AQUEOUS)**

model file sumame: 8171602F

HF, balance of water

Release amount				
mixture	density	weight	volume	
volume				
gallons	lb/gal	lb	kg	m3
55	9.02	496.1	225.0	0.2

containment	building
surf area	mitigation
ft2	factor
NA	0.1

spill
w/ mititation
over 60 sec
m3/s
0.000347

largest tank	
mixture	
weight	
lb	kg
496.1	225.0

HF				LPool molar fraction			
wt.	weight	mol wt.	amount	water	water	water	comp.
%	kg	kg/kgmol	mol	weight	mol wt.	amount	water
				kg	kg/kgmol	mol	
12.0	27	20.01	1.3	198	18.0	11.0	0.109
							0.891

**HYDROCHLORIC ACID (AQUEOUS)**

model file sumame: 8171602C

HCl, balance of water

Release amount				
mixture	density	weight	volume	
volume				
gallons	lb/gal	lb	kg	m3
275	9.84	2706.3	1227.4	1.0

containment	building
surf area	mitigation
ft2	factor
NA	0.1

spill
w/ mititation
over 60 sec
m3/s
0.001735

largest tank	
mixture	
weight	
lb	kg
2706.3	1227.4

HCL				LPool molar fraction			
wt.	weight	mol wt.	amount	remaining	water	water	comp.
%	kg	kg/kgmol	mol	weight	mol wt.	amount	water
				kg	kg/kgmol	mol	
30.0	368	36.46	10.1	859	18.0	47.7	0.175
							0.825

**NITRIC ACID (AQUEOUS) (ASSUME NO2 RELEASED)**

model file sumame: 8171602B

HNO3, balance of water

Release amount				
mixture	density	weight	volume	
volume				
gallons	lb/gal	lb	kg	m3
275	9.34	2568.7	1165.0	1.0

containment	building
surf area	mitigation
ft2	factor
NA	0.1

spill
w/ mititation
over 60 sec
m3/s
0.001735

largest tank	
mixture	
weight	
lb	kg
2568.7	1165.0

HNO3				LPool molar fraction			
wt.	weight	mol wt.	amount	remaining	water	water	comp.
%	kg	kg/kgmol	mol	weight	mol wt.	amount	water
				kg	kg/kgmol	mol	
30.0	349	63.08	5.5	815	18.0	45.3	0.109
							0.891

**2016-EQ, RMP Modeling  
Koogler Project: 817\_16\_02**

**RISK MANAGEMENT PLANNING, OFF-SITE CONSEQUENCE ANALYSIS**

**HG system compound input values**

	HCL		HF		HNO3		
specific heat of vapour	29.2	1	29.1	2	53.0	3	J/mole-K
specific heat of liquid	90	1	50.2	2	109.6	4	J/mole-K
heat of vaporization	16334	1	25777	2	39000	1	J/mole
critical temperature	325	3	461.1	2	431	1	K
critical pressure	83	3	64	2	101	1	atm
vapor B1	-6.156		-6.156	2	-6.156		
vapor B2	-4.348		-4.348	2	-4.348		
vapor B3	13.13		13.13	2	13.13		
vapor B4	-33.14		-33.14	2	-33.14		
molar mass	36.46	1	20.01	2	63.08	1	kg/kmole
liquid density	1193	1	977.7	2	1510	1	kg/m3
amt boil pt	188	1	293	2	356	1	K
vapour viscosity	1.34E-05	1	0.000108	2	1.3E-10	1	kg/m/s

1 <http://encyclopedia.airliquide.com/> (use NO2 for nitric acid gas)

2 provided by Hgssystem

3 <http://webbook.nist.gov/> (for nitric acid at 298 K)

4 use heat of vaporization at 298 K



**2016-EQ, RMP Modeling**  
**Koogler Project: 817\_16\_02**  
**RISK MANAGEMENT PLANNING, OFF-SITE CONSEQUENCE ANALYSIS**

**Compound Thermochemical Properties**

**TOXIC COMPOUND VAPOR PRESSURE - estimator**

VAPOR PRESSURE - WAGNER EQUATION										Atm. Pressure @ 298 K	
	B1	B2	B3	B4	T	Tc	Tr	Q	Pc	atm	mm Hg
HF	-6.156	-4.348	13.130	-33.140	309	461.1	0.670	0.330	64	1.7	1303
HCL	-6.156	-4.348	13.130	-33.140	309	325	0.951	0.049	45	31.2	23693
nitric acid (NO2)	-6.156	-4.348	13.130	-33.140	309	431	0.717	0.283	101	5.27	4008

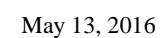
use trend of HF basis for other gases. Trend line similar other than Tc and Pc

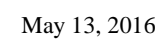
#### **14.0 ITEMS NOT APPLICABLE TO THE PERMIT RENEWAL APPLICATION**

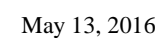
The following items are not applicable to the EQ facility and information pertaining to them is not included in this permit renewal application:

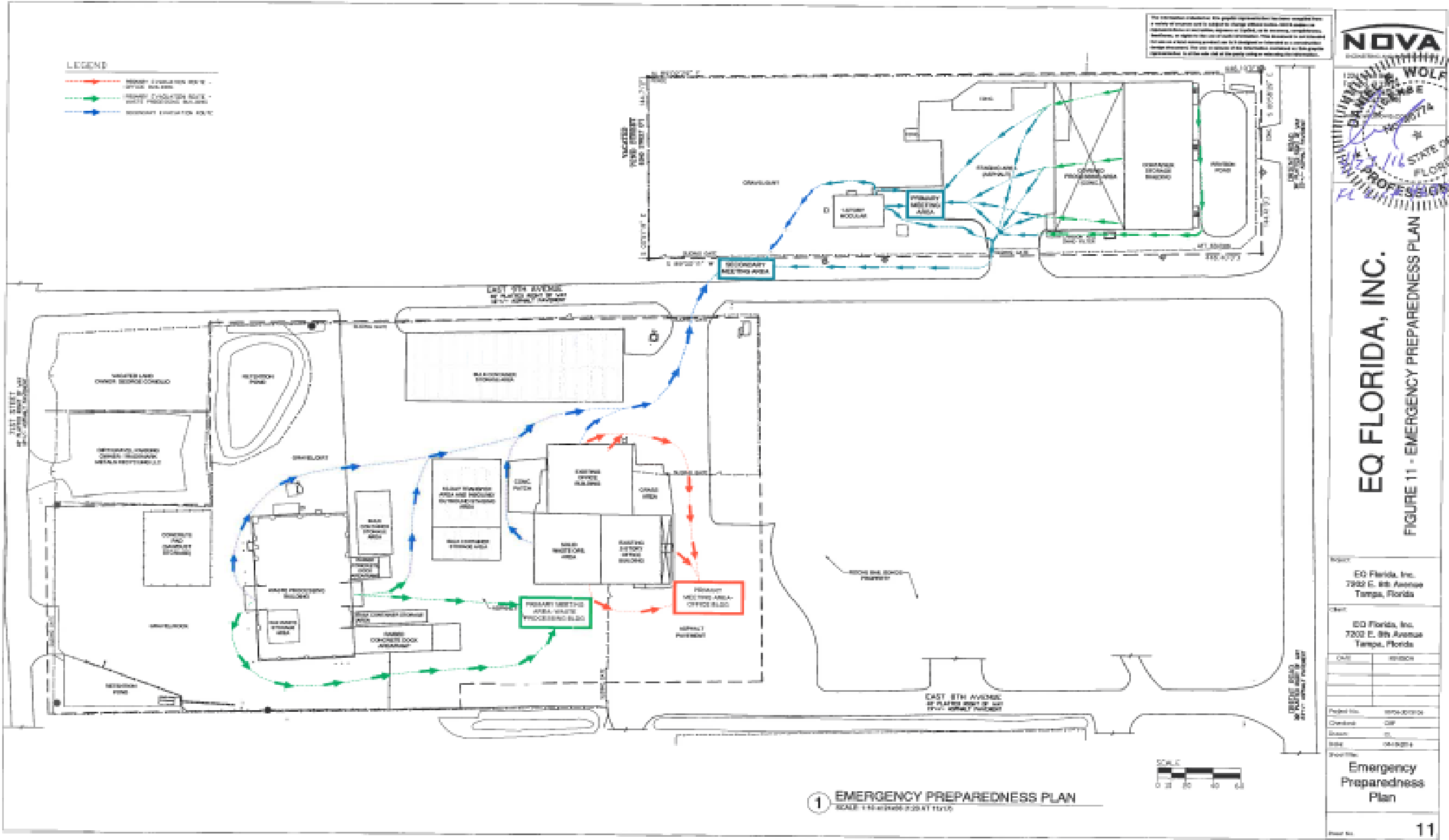
- Surface Impoundments
- Waste Piles
- Land Treatment
- Landfills
- Incinerators
- Compliance Schedule
- Groundwater Protection
- Research, Development, and Demonstration
- Air Emission Standards for Process Vents
- Air Emission Standards for Equipment Leaks
- Boilers and Industrial Furnaces
- Requirements for Drip Pads
- Professional Geologist Certification

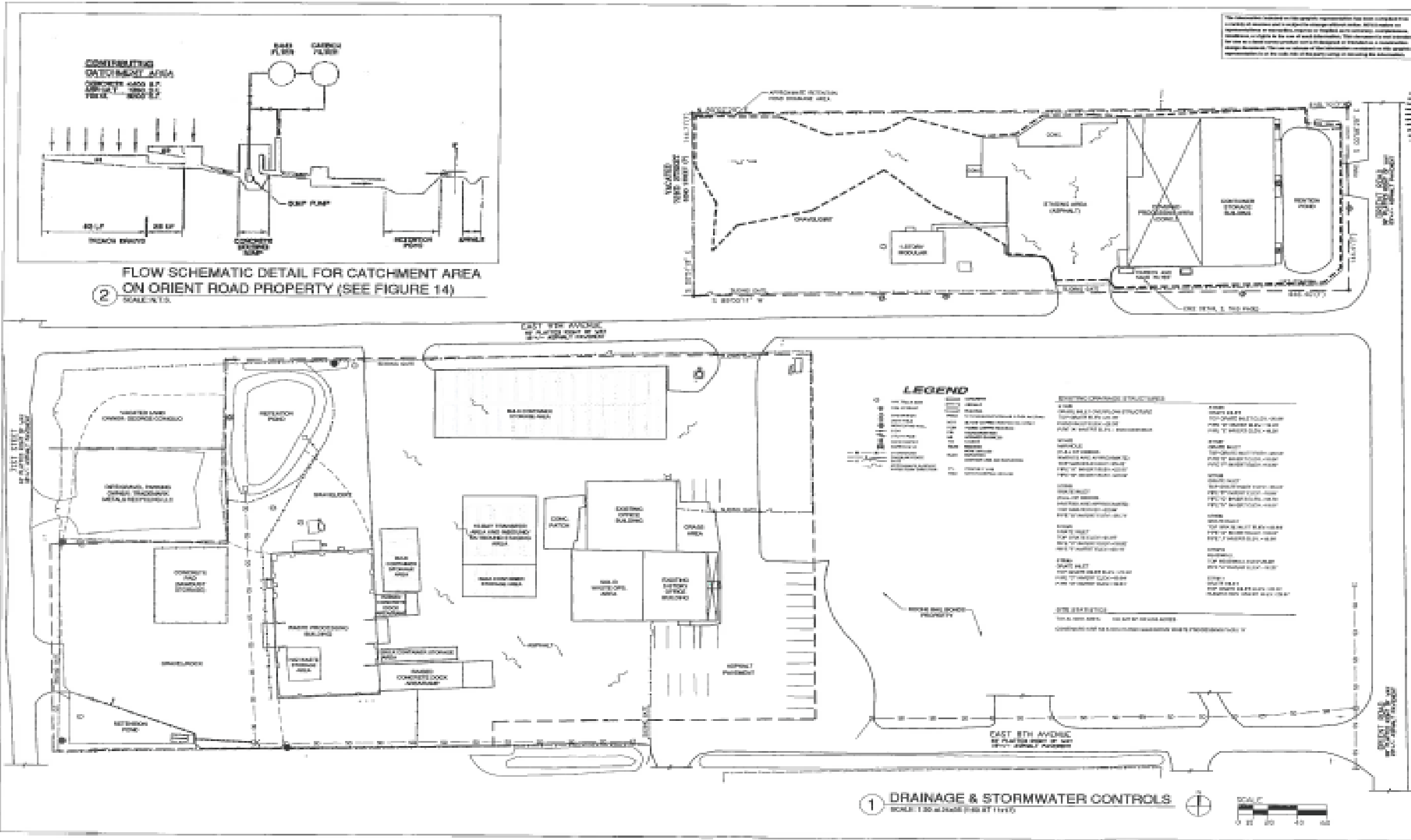
## **FIGURES**











**NOVA**  
DANIEL E. MOORE  
STATE OF FLORIDA  
PROFESSIONAL ENGINEER  
No. 123456789  
Exp. 12/31/2016

**EQ FLORIDA, INC.**

**FIGURE 13 - DRAINAGE & STORMWATER CONTROLS**

Project:  
EQ Florida, Inc.  
7202 E. 8th Avenue  
Tampa, Florida

Client:  
EQ Florida, Inc.  
7202 E. 8th Avenue  
Tampa, Florida

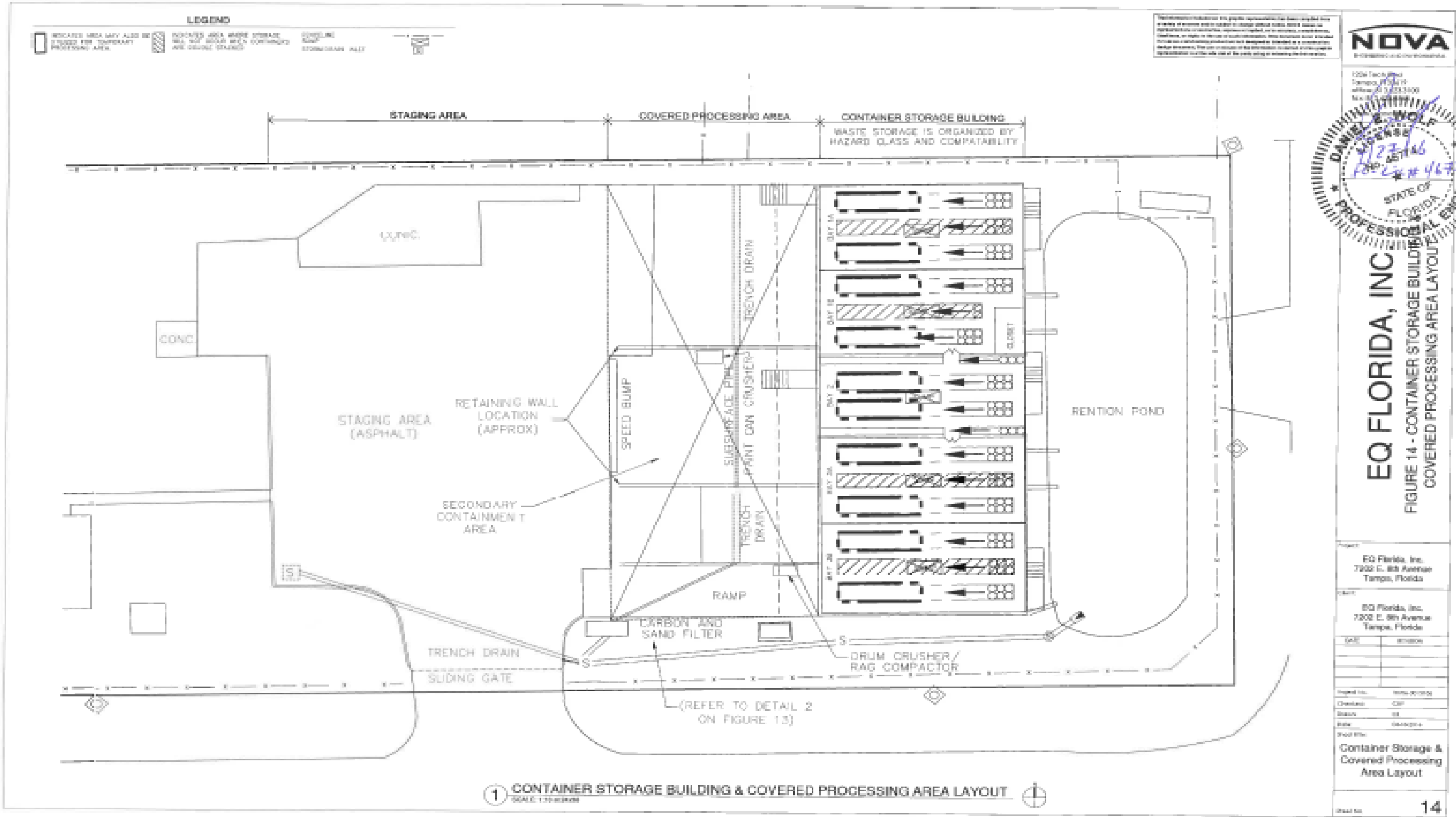
DATE	DESCRIPTION

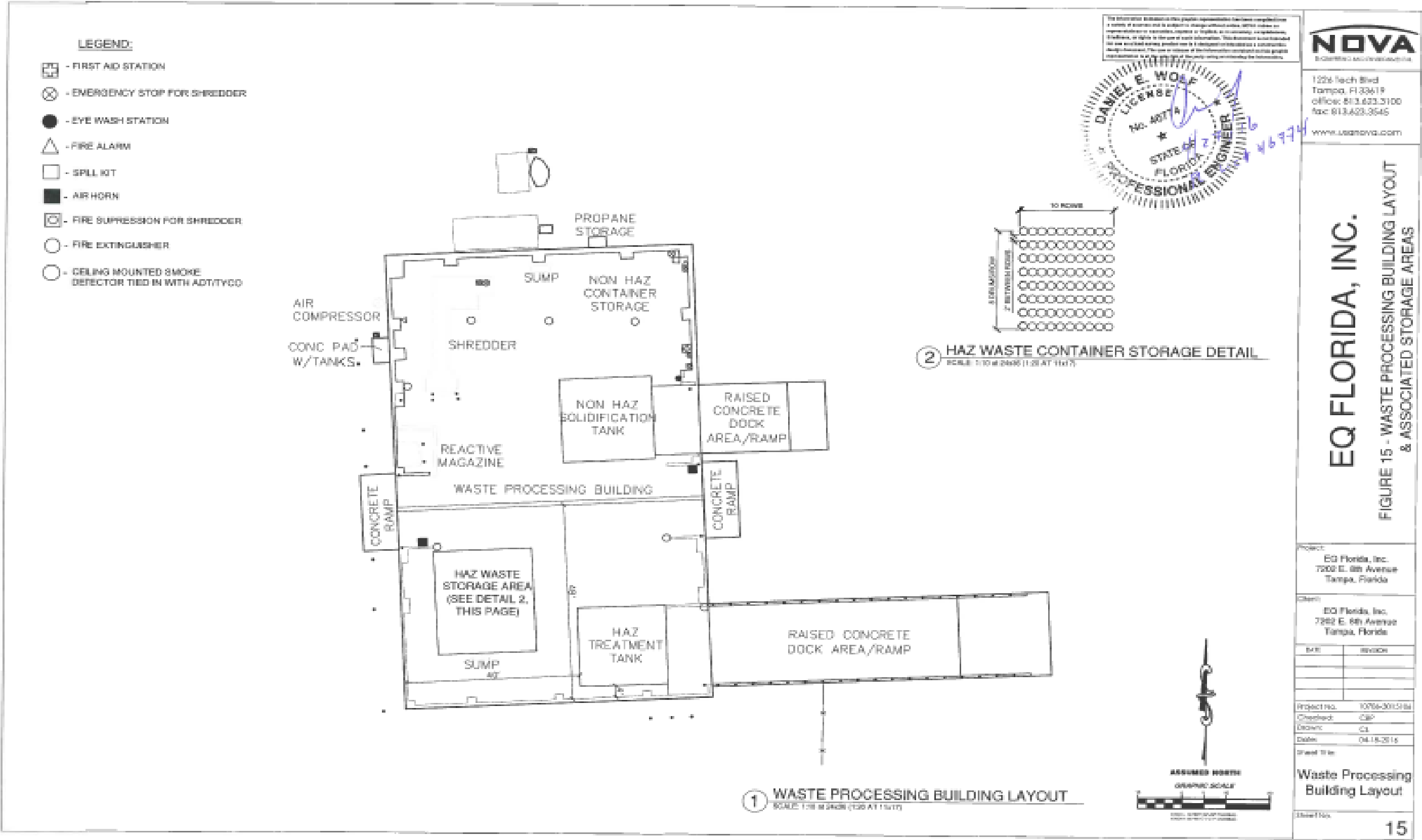
Prepared by: [Name]  
Checked by: [Name]  
Drawn by: [Name]  
Date: 04/14/2016  
Drawn by: [Name]

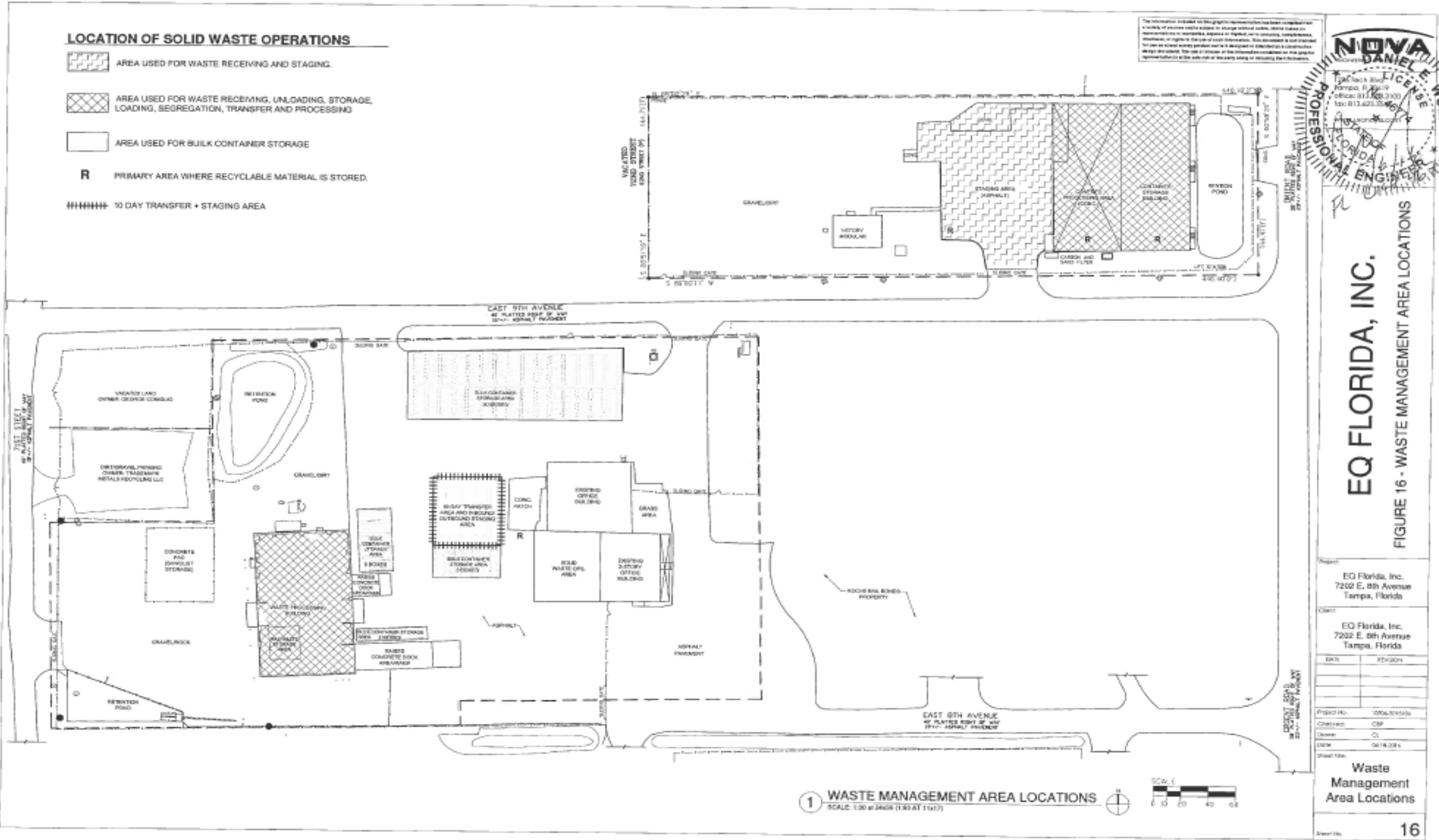
**Drainage & Stormwater Controls**

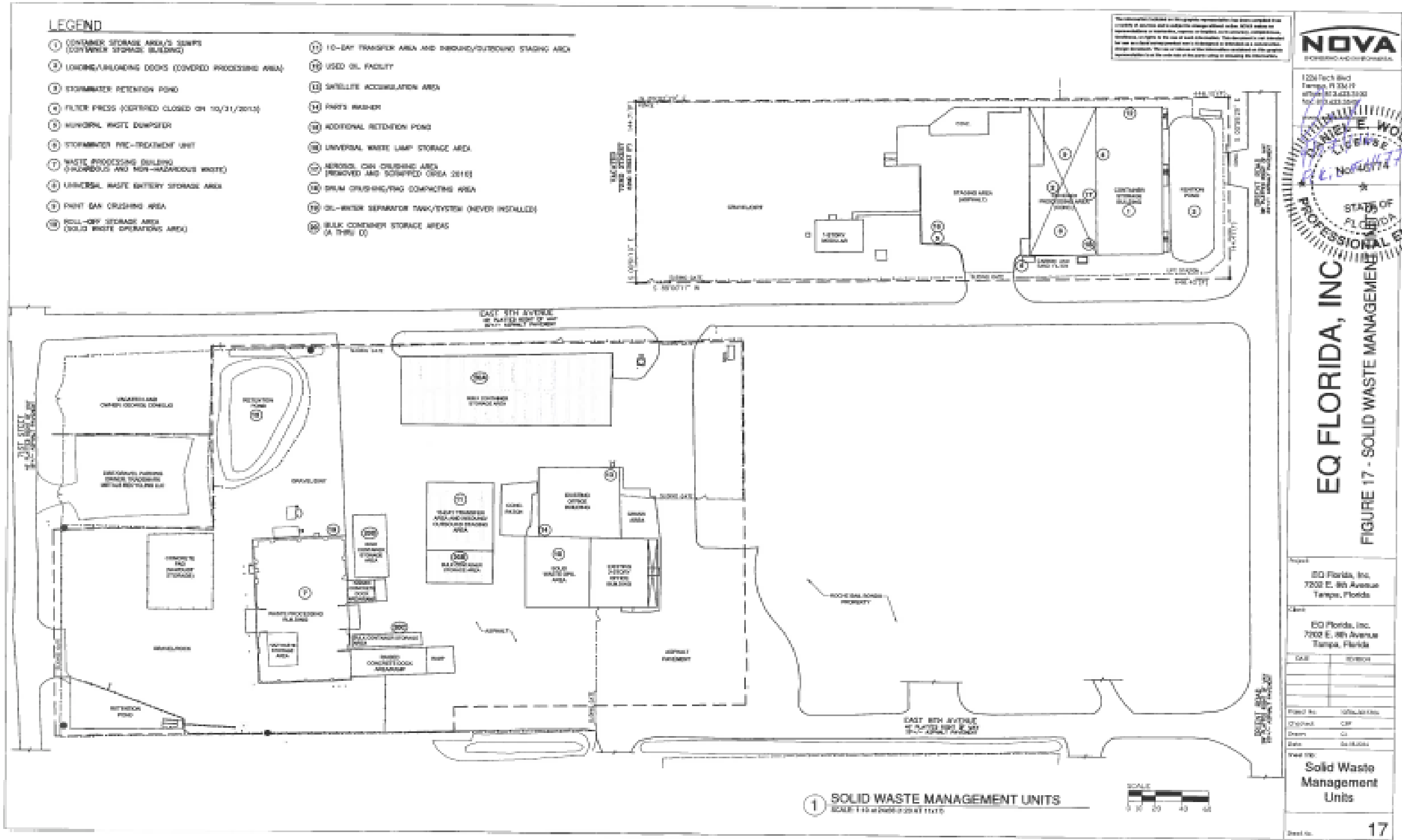
Sheet No. **13**











**VOLUME 2 OF 3**

# **Permit Modification Application**

**FOR**

**Modification Application for Operation of a  
Hazardous Waste Treatment and Storage Facility**

**AT**

**7202 East 8<sup>th</sup> Avenue  
Tampa, FL 33619**

***Permit No.: 34875-HO-011***

**EQ Florida, Inc.  
7202 East 8<sup>th</sup> Avenue  
Tampa, FL 33619**

**Revision: 01  
May 13, 2016**

## **CONTENTS – VOLUME 2 OF 3**

<b><u>Appendix</u></b>	<b><u>Title / Contents</u></b>
Appendix A	Articles of Incorporation <ul style="list-style-type: none"><li>• EQFL Articles of Incorporation</li><li>• Property Warranty Deed</li></ul>
Appendix B	Summary of Permitted EPA Hazardous Waste Codes
Appendix C	EQFL Permit List Summary
Appendix D	Facility & Hazardous Waste Management Building As-Built Drawings
Appendix E	SWFWMD Well Inventory
Appendix F	Financial Assurance & Insurance Documentation
Appendix G	Solid Waste Management Units <ul style="list-style-type: none"><li>• SWMU Identification Summary</li><li>• EPA RCRA RFA Letter, dated January 30, 1990</li><li>• FDEP RCRA RFA Addendum, dated May 13, 2011</li></ul>
Appendix H	EQFL Supplemental Emergency & Safety Equipment
Appendix I	Equipment Specifications <ul style="list-style-type: none"><li>• Drum Compactor</li><li>• Paint Can Crusher</li><li>• Fluorescent Lamp Disposer</li><li>• Floor Coatings</li><li>• Reactives Magazine</li><li>• Hazardous Waste Treatment Unit</li></ul>
Appendix J	Waste Analysis Plan Documentation & EQFL SOPs <ul style="list-style-type: none"><li>• Waste Profile Form</li><li>• LDR Notification Form</li><li>• Chain of Custody Form</li><li>• Waste Screening Flow Chart</li><li>• Container Contents Form</li><li>• Waste Receiving Report</li><li>• EQFL Standard Operating Procedures</li></ul>
Appendix K	In-Bound Waste Shipment Records & Waste Characterization Reports
Appendix L	Proof of Publication of Notice
Appendix M.	Preparedness and Prevention Plan and Hazardous Waste Contingency/Emergency Response Plan

## **APPENDIX A**

### ***Articles of Incorporation***

## **APPENDIX B**

### ***Summary of Permitted EPA Hazardous Waste Codes***



**EQ FLORIDA INC.**  
**Summary of Characteristic and Listed Hazardous Wastes**

Proces Code	Process Design Capacity and Units of Measure	Hazardous Waste Code(s)	Annual Quantity of Hazardous Waste (Gallons) <sup>2</sup>
S01	The permitted maximum capacity of 50,000 gallons is not exceeded at any time.	D001	1,174,068
S01		D003	90,720
S01		F001 & F002	148,102
S01		F003 & F005	339,703
S01		F006-F012 & F019	76,769
S01		"F" listed Wastes (Excluding F001, F002, F003, F005-F012 & F019)	125
S01		"K" Listed Wastes	11,000
S01		"U" Listed Waste	74,269
TOTAL =			1,914,756
T21 <sup>1</sup>		"D" Characteristic Waste (Excluding D001 & D003)	713,601
T21 <sup>1</sup>		K062	10,000
TOTAL =			723,601

1/ Chemical fixation/solidification/stabilization in the treatment tank.

2/ Based on actual volume of waste processed during CY 2015.

**Total Existing & Proposed Hazardous Waste Storage Capacities**

**Existing**

Container Storage Building (CSB) Bay 1	20,000 Gallons <sup>3</sup>
Container Storage Building (CSB) Bay 2	10,000 Gallons <sup>3</sup>
Container Storage Building (CSB) Bay 3	20,000 Gallons <sup>3</sup>
Improved Secondary Containment (ISC)	10,000 Gallons <sup>3</sup>
Inbound/Outbound Staging Area (I/O)	10,000 Gallons <sup>3</sup>
10-Day Transfer Area	20,000 Gallons or 100 Cubic Yards

**Proposed**

Bulk Container Storage Areas (BCSA)	800 Cubic Yards
Waste Processing Building (WPB)	4,400 Gallons

3/ Provided the permitted maximum capacity of 50,000 gallons is not exceeded at any time.

Each bay may contain hazardous wastes with any of the EQ permitted waste codes. The hazardous waste is segregated into separate bays (and containment) by hazard class and compatibility, not by waste code.

EQ Florida, Inc.																	
PERMITTED HAZARDOUS WASTE CODES																	
CHARACTERISTIC WASTE																	
D001	D002	D003	D004	D005	D006	D007	D008	D009	D010	D011	D012	D013	D014	D015	D016	D017	D018
D019	D020	D021	D022	D023	D024	D025	D026	D027	D028	D029	D030	D031	D032	D033	D034	D035	D036
D037	D038	D039	D040	D041	D042	D043											
HAZARDOUS WASTE FROM NON-SPECIFIC SOURCES																	
F001	F002	F003	F004	F005	F006	F007	F008	F009	F010	F011	F012	F019	F020	F021	F022	F023	F024
F025	F026	F027	F028	F032	F034	F035	F037	F038	F039								
HAZARDOUS WASTE FROM SPECIFIC SOURCES																	
K001	K002	K003	K004	K005	K006	K007	K008	K009	K010	K011	K013	K014	K015	K016	K017	K018	K019
K020	K021	K022	K023	K024	K025	K026	K027	K028	K029	K030	K031	K032	K033	K034	K035	K036	K037
K038	K039	K040	K041	K042	K043	K044	K045	K046	K047	K048	K049	K050	K051	K052	K060	K061	K062
K069	K071	K073	K083	K084	K085	K086	K087	K088	K093	K094	K095	K096	K097	K098	K099	K100	K101
K102	K103	K104	K105	K106	K107	K108	K109	K110	K111	K112	K113	K114	K115	K116	K117	K118	K123
K124	K125	K126	K131	K132	K136	K141	K142	K143	K144	K145	K147	K148	K149	K150	K151	K161	
DISCARDED COMMERCIAL CHEMICAL PRODUCTS, OFF-SPECIFICATION SPECIES, CONTAINER RESIDUES AND SPILL RESIDUES THEREOF																	
P001	P002	P003	P004	P005	P006	P007	P008	P009	P010	P011	P012	P013	P014	P015	P016	P017	P018
P020	P021	P022	P023	P024	P026	P027	P028	P029	P030	P031	P033	P034	P036	P037	P038	P039	P040
P041	P042	P043	P044	P045	P046	P047	P048	P049	P050	P051	P054	P056	P057	P058	P059	P060	P062
P063	P064	P065	P066	P067	P068	P069	P070	P071	P072	P073	P074	P075	P076	P077	P078	P081	P082
P084	P085	P087	P088	P089	P092	P093	P094	P095	P096	P097	P098	P099	P101	P102	P103	P104	P105
P106	P108	P109	P110	P111	P112	P113	P114	P115	P116	P118	P119	P120	P121	P122	P123	P127	P128
P185	P188	P189	P190	P191	P192	P194	P196	P197	P198	P199	P201	P202	P203	P204	P205		
U001	U002	U003	U004	U005	U006	U007	U008	U009	U010	U011	U012	U014	U015	U016	U017	U018	U019
U020	U021	U022	U023	U024	U025	U026	U027	U028	U029	U030	U031	U032	U033	U034	U035	U036	U037
U038	U039	U041	U042	U043	U044	U045	U046	U047	U048	U049	U050	U051	U052	U053	U055	U056	U057
U058	U059	U060	U061	U062	U063	U064	U066	U067	U068	U069	U070	U071	U072	U073	U074	U075	U076
U077	U078	U079	U080	U081	U082	U083	U084	U085	U086	U087	U088	U089	U090	U091	U092	U093	U094
U095	U096	U097	U098	U099	U101	U102	U103	U105	U106	U107	U108	U109	U110	U111	U112	U113	U114
U115	U116	U117	U118	U119	U120	U121	U122	U123	U124	U125	U126	U127	U128	U129	U130	U131	U132
U133	U134	U135	U136	U137	U138	U140	U141	U142	U143	U144	U145	U146	U147	U148	U149	U150	U151
U152	U153	U154	U155	U156	U157	U158	U159	U160	U161	U162	U163	U164	U165	U166	U167	U168	U169
U170	U171	U172	U173	U174	U176	U177	U178	U179	U180	U181	U182	U183	U184	U185	U186	U187	U188
U189	U190	U191	U192	U193	U194	U196	U197	U200	U201	U203	U204	U205	U206	U207	U208	U209	U210
U211	U213	U214	U215	U216	U217	U218	U219	U220	U221	U222	U223	U225	U226	U227	U228	U234	U235
U236	U237	U238	U239	U240	U243	U244	U246	U247	U248	U249	U271	U278	U279	U280	U328	U353	U359
U364	U367	U372	U373	U387	U389	U394	U395	U404	U409	U410	U411						

## **APPENDIX C**

### ***EQFL Permit List Summary***

EQ Florida, Inc. Environmental Permit List			
Permit	Permit #	Agency	Expiration Date
EPA ID #	FLD981932494	FDEP	N/A
EPA STORM WATER NOI MULTI-SECTOR	FLR05E179	FDEP	7/21/2016
ENVIRONMENTAL RESOURCES PERMIT	29-024691-003	FDEP	N/A
SOLID WASTE PERMIT	34757-010/SO/30	FDEP	4/1/2019
MERCURY STORAGE & TRANSPORTER	FLD981932494	FDEP	3/1/2017
HAZARDOUS WASTE TRANSPORTER	FLD981932494	FDEP	6/30/2017
TAMPA PORT AUTHORITY WASTE OIL	N/A	TPA	9/30/2016
WASTE TIRE COLLECTOR	00044633	FDEP	4/1/2017
USED OIL COLLECTION & TRANSPORTER	FLD981932494	FDEP	6/30/2017
BROWARD CO. WASTE TRANSPORTER	WT-14-0018	DNRP	4/30/2018
HAZARDOUS WASTE PERMIT (TSDF)	34875-HO-011	FDEP	4/1/2019

## **APPENDIX D**

### ***Facility & Hazardous Waste Management Building As-Built Drawings***

## **APPENDIX E**

### ***SWFWMD Well Inventory***

**SWFWMD Well Inventory\***

Permit #	Owner	Address	Well Use
828677	GERDAU AMERISTEEL US, INC.	7103 E 6TH AVE	PLUGGED
829096	VOGT PROPERTIES LLC	6920 E 14TH AV	MONITOR
829746	WILLIAM D MCKNIGHT INC	7401 E BROADWAY AV	MONITOR
831690	TAMPA BAY METALS TRADING CO	7112 E 7TH AV	MONITOR
831691	TRADEMARK METALS RECYCLING LLC	7101 E 7TH AV	MONITOR
831692	TRADEMARK METALS RECYCLING LLC	6901 E 7TH AV	MONITOR
831693	LEVANT ENTERPRISES LLC	6902 E 6TH AV	MONITOR
831694	TRADEMARK METALS RECYCLING LLC	6912 E 9TH AV	MONITOR
832184	TRADEMARK METALS RECYCLING LLC	6912 E 9TH AV	MONITOR
834380	TAMPA BAY STEEL CORPORATION	6901 E 6TH AV	MONITOR
834381	GERDAU AMERISTEEL US, INC.	7103 E 6TH AVE	MONITOR
834382	TRADEMARK METALS RECYCLING LLC	6901 E 7TH AV	MONITOR
834383	EQ FLORIDA INC	7202 8TH AV	MONITOR
835392	SUN STATE INTERNATIONAL REAL E	7105 E 6TH AVE	MONITOR
837895	EQ FLORIDA INC	7202 8TH AV	MONITOR
837943	HILLSBOROUGH COUNTY	1800 N ORIENT RD	MONITOR
838797	AWDW Holdings LLC	7103 E 6th Ave	IRRIGATION - LANDSCAPE
839032	EQ FLORIDA INC	2002 N ORIENT RD	PLUGGED
840409	WILLIAM D MCKNIGHT INC	7401 E BROADWAY AV	MONITOR
841219	SOUTHWEST FLORIDA WATER MANAGEMENT	BYPASS CANAL	MONITOR
842681	JOSE LUIS RAMOS TRUSTEE	6925 E BROADWAY AV	MONITOR
842718	CSX TRANSPORTATION, INC.	5300 UCETA RD	PLUGGED
842897	HELENA CHEMICAL CO	2405 N 71ST ST	MONITOR
842898	HELENA CHEMICAL CO	2405 N 71ST ST	MONITOR
845387	ENVIROFOCUS TECHNOLOGIES LLC	1902 N 66TH ST	MONITOR
845388	ENVIROFOCUS TECHNOLOGIES LLC	1902 N 66TH ST	MONITOR
845396	ENVIROFOCUS TECHNOLOGIES LLC	1902 N 66TH ST	PLUGGED
845925	CSX TRANSPORTATION, INC.	5300 UCETA RD	PLUGGED
848999	LEVANT ENTERPRISES LLC	6902 E 6TH AV	MONITOR
849000	EQ FLORIDA INC	7202 8TH AV	MONITOR
849001	CITY OF TAMPA	ROW 7TH & 8TH AVES	MONITOR
849390	JOSE LUIS RAMOS TRUSTEE	6925 E BROADWAY AV	PLUGGED
849908	SEVENTH AVE PROPERTIES LLC	2409 N ORIENT RD	MONITOR

\*Water Management Information System Search for Well Construction Permits Issued 01/01/2013 - 04/25/2016

## **APPENDIX F**

### ***Financial Assurance & Insurance Documentation***



***Requisite Insurance Documentation and a Letter of Credit in favor of the State of Florida will be issued upon the Department's review and acceptance of the facility closure cost estimate provided in Section 9.0 of this Permit Application.***

## **APPENDIX G**

### ***Solid Waste Management Units***

**EQ Florida Inc.**  
**Solid Waste Management Unit (SWMU)**  
**Identification Summary**

<b>SWMU No.</b>	<b>SWMU Name / Description</b>	<b>Years of Operation</b>	<b>Waste Managed</b>	<b>Evidence of Release</b>
1	Container Storage Building (CSB)	June 1990 - Present	Permitted Wastes	None
2	Loading/Unloading Dock Area (Covered Processing Area)	June 1990 - Present	Permitted Wastes	None
3	Stormwater Retention Pond	June 1990 - Present	Stormwater	None
4	Filter Press	Certified Closed on 10/31/2013	None	None
5	Municipal Waste Dumpster	June 1990 - Present	RCRA Empty Containers, Office Waste	None
6	Stormwater Pre-Treatment Unit	June 1990 - Present	Stormwater	None
7	Waste Processing Building (WPB)	June 2006 - Present	Hazardous & Non-Hazardous Waste	None
8	Universal Waste Battery Storage Area	January 2009 - Present	Universal Waste Batteries	None
9	Paint Can Crushing Area	1996 - Present	Scrap Cans and Paint	None
10	Roll-Off Storage Area (Solid Waste Operations Area)	July 2010 - Present	Non-Hazardous Waste	None
11	10-Day Transfer Facility & Inbound/Outbound (I/O) Staging Area	July 2011 - Present	Permitted Wastes	None
12	Used Oil Facility	June 1990 - Present	Used Oil	None
13	Satellite Accumulation Area	January 2002 - Present	Laboratory Waste	None
14	Parts Washer	January 2009 - Present	Parts Washer Solvent	None
15	Additional Retention Pond	July 2010 - Present	Stormwater	None
16	Universal Waste Lamp Storage Area	2002 - Present	Universal Waste Lamps	None
17	Aerosol Can Crushing Area	Removed & Scrapped Circa 2010	None	None
18	Drum Crushing Area	1996 - Present	RCRA Empty Metal Containers	None
19	Oil-Water Separator System	Never Installed	None	None
20a	Bulk Container Storage Area (BCSA)	Proposed	Hazardous & Non-Hazardous Waste	None
20b	Bulk Container Storage Area (BCSA)	Proposed	Hazardous & Non-Hazardous Waste	None
20c	Bulk Container Storage Area (BCSA)	Proposed	Hazardous & Non-Hazardous Waste	None
20d	Bulk Container Storage Area (BCSA)	Proposed	Hazardous & Non-Hazardous Waste	None

The locations of the SWMUs summarized above are depicted on Figure 17.

### Photos of SWMU-7



SWMU 7 – Waste Processing Building - Hazardous Waste Treatment Tank. This photograph shows the hazardous waste treatment tank, facing south west. Photo taken 2014.

### Photos of SWMU-7



SWMU 7 – Waste Processing Building – Non-Hazardous Waste Treatment Tank. This photograph shows the hazardous waste treatment tank, facing south. Photo taken 2014.

### Photos of SWMU-7



SWMU 7 – Waste Processing Building – Reactives Magazine. This photograph shows the reactivities Magazine hazardous waste treatment tank, facing west. Photo taken 2016.



### Photos of SWMU-7



SWMU 7 – Waste Processing Building – Container Storage. This photograph shows the proposed location of the container storage location, facing south. Photo taken 2016.

Photo of SWMU 12



SWMU 12 – Used Oil Facility. The Used Oil Facility is located in Bay 1 of the Container Storage Building (CSB). Photo taken 2016



### Photos of SWMU-19



SWMU 19 – Proposed location of the Oil-Water Separator. This photograph shows the proposed location of the Oil-Water Separator, facing south. The unit was never installed. Photo taken 2016.

### Photos of SWMU-20



SWMU 20a – Location of the Bulk Container Storage Area (BCSA). This photograph shows the proposed location of the Bulk Container Storage Area, facing north. Photo taken 2016.



### Photos of SWMU-20



SWMU 20b – Location of the Bulk Container Storage Area (BCSA). This photograph shows the proposed location of the Bulk Container Storage Area, facing north. Photo taken 2016.

### Photos of SWMU-20



SWMU 20c – Location of the Bulk Container Storage Area (BCSA). This photograph shows the proposed location of the Bulk Container Storage Area, facing west. Photo taken 2016.

### Photos of SWMU-20



SWMU 20d – Location of the Bulk Container Storage Area (BCSA). This photograph shows the proposed location of the Bulk Container Storage Area, facing west. Photo taken 2016.

## **APPENDIX H**

### ***Supplemental Emergency & Safety Equipment***



**EQ Florida, Inc.**

**SUPPLEMENTAL EMERGENCY AND SAFETY EQUIPMENT**

1. Hand-Held Air Horns (3)
2. Telephones (2)
3. Emergency Lights (4)
4. Pull Alarms (6)
5. Fire Extinguishers (6)
6. Emergency Exits (6)
7. Containment Sumps (5)
8. Spill Kits (Acid, Alkaline, Solvent) (1 each)
9. Fire Hoses (3)
10. Safety Equipment Cabinets (2)
11. UV Smoke and Flame Detectors (6)
12. Heat Sensors (2)
13. LEL Sensors (2)
14. LEL Meter (1)
15. SCBA Respirator (1)
16. Eye Washes (2)
17. Safety Shower (1)
18. Sprinkler Systems (2)
19. Foam System (1)
20. Intrusion Alarm System (1)
21. Fire Alarm System (1)

(Supplemental emergency and safety equipment which may not be referenced in the PPP/CP)

## **APPENDIX I**

### ***Equipment Specifications***



## **APPENDIX J**

### ***Waste Analysis Plan Documentation & EQFL SOPs***



## WASTE PROFILE FORM

Profile Tracking # \_\_\_\_\_

*For assistance in completing this document or for additional information on service offerings,  
please visit our website at [www.usecology.com](http://www.usecology.com), or call 800-592-5489.*

**US Ecology will choose the appropriate facility and method of waste management  
for your waste from the technologies offered at each operation.**

**If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:**

**Waste Common Name:** \_\_\_\_\_

### Section 1 – Generator & Customer Information

Generator EPA ID # \_\_\_\_\_

NAICS/SIC Code \_\_\_\_\_

Generator \_\_\_\_\_

Facility Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

**24-hour Emergency Response Number**

\_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Generator Contact \_\_\_\_\_

Title \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_

E-mail \_\_\_\_\_

Internal Use Only: EQ Division \_\_\_\_\_

EQ Customer No. \_\_\_\_\_

**Invoicing Company** \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Country \_\_\_\_\_

Invoicing Contact \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_

Technical Contact \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_

Cell Phone \_\_\_\_\_

E-mail \_\_\_\_\_

### Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: \_\_\_\_\_

b) Frequency: ☐ One time ☐ Month ☐ Year ☐ Other: \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☐ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49CFR 172.101 Hazardous Materials Table:

\_\_\_\_\_

### Section 3 – Special Properties

3.1) Color \_\_\_\_\_

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia

☐ Other: \_\_\_\_\_

3.3) Consistency at 70°F: ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☐ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☐ ≤2 ☐ 2.1-4.9 ☐ 5 – 10 ☐ 10.1 – 12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90°F ☐ 90-139°F ☐ 140-199°F ☐ >200°F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

- |  |   |  |   |                                      |
|--|---|--|---|--------------------------------------|
| <input type="checkbox"/> None                                    | <input type="checkbox"/> Free Liquids       | <input type="checkbox"/> Metal Fines       | <input type="checkbox"/> Water Reactive   | <input type="checkbox"/> Biohazard   |
| <input type="checkbox"/> Shock Sensitive                         | <input type="checkbox"/> Oily Residue       | <input type="checkbox"/> Dioxins           | <input type="checkbox"/> Furans           | <input type="checkbox"/> Aluminum    |
| <input type="checkbox"/> Asbestos – non-friable                  | <input type="checkbox"/> Asbestos – friable | <input type="checkbox"/> Other Radioactive | <input type="checkbox"/> Air Reactive     | <input type="checkbox"/> Isocyanates |
| <input type="checkbox"/> Biodegradable Sorbents                  | <input type="checkbox"/> Pyrophoric         | <input type="checkbox"/> Reactive Sulfide  | <input type="checkbox"/> Reactive Cyanide | <input type="checkbox"/> Explosives  |
| <input type="checkbox"/> Temperature Controlled Organic Peroxide | <input type="checkbox"/> NORM               | <input type="checkbox"/> TENORM            |   |                                      |

#### Section 4 – Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges of the material, either estimated or known.

\_\_\_\_\_ to \_\_\_\_\_%      \_\_\_\_\_ to \_\_\_\_\_%  
\_\_\_\_\_ to \_\_\_\_\_%      \_\_\_\_\_ to \_\_\_\_\_%

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☐ No  
\*If yes, describe: \_\_\_\_\_

#### Section 5 – Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

- 5.1) Is this waste exempted from RCRA? ☐ Yes, please provide exemption: \_\_\_\_\_ ☐ No
- 5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes: \_\_\_\_\_ ☐ No
- a) For F006–F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☐ No
- 5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☐ Yes: \_\_\_\_\_ ☐ No
- 5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes: \_\_\_\_\_ ☐ No

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: \_\_\_\_\_ EPA Form Code: \_\_\_\_\_

5.6) Waste Code Determination Is Based On: ☐ Generator Knowledge ☐ Analysis ☐ MSDS  
*Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.*

- 5.7) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☐ No
- a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☐ NWW
- b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40CFR 268.49? ☐ Yes ☐ No
- c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☐ No  
(Debris is greater than 2.5 inches in size.)
- d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight:

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☐ Yes\* ☐ No  
\*If Yes, please list: \_\_\_\_\_  
*For a complete list of UHC constituents, please refer to 40 CFR 268.48*

### Section 6 – Non-Hazardous Wastes

Please list applicable waste code(s): \_\_\_\_\_

- 6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☐ No
- 6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☐ N/A
- 6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☐ No
- a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No
- b) If yes, what is the source of the halogen content?
- ☐ This is a metalworking oil/fluid containing chlorinated paraffins.
- ☐ This is used oil contaminated with chlorofluorocarbons from refrigeration units.
- ☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_
- ☐ Other, describe: \_\_\_\_\_

### Section 7 – TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☐ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☐ No ☐ Unknown  
*If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.*
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☐ No  
\*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

### Section 8 – Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☐ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☐ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☐ No

\*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, \_\_\_\_\_ required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.

- 8.4) Does this waste stream contain Benzene? ☐ Yes ☐ No

*If you answered "no" to 8.4, please proceed to Section 9.*

- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)?

☐ Yes, please provide the SIC/NAICS code: \_\_\_\_\_ ☐ No

*If you answered "no" to questions 8.5, please proceed to Section 9.*

- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site?

☐ Yes, please specify: \_\_\_\_\_ ☐ No

- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No

- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No

- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ Mg/Year

- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.

**Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

***If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.***

Generator Signature \_\_\_\_\_ Printed Name \_\_\_\_\_

Company \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

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7/15/15

#### STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ – The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste. The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

##### Definitions

The following definitions shall apply for purposes of this Agreement:

**"Acceptable Waste"** shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

**"Delivered Wastes"** shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) ) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

**"Non-Conforming Wastes"** shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

##### Control of Operations

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

##### Identification of Waste

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

##### Non-Conforming Wastes

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

##### Customer Warranty - Acceptable Wastes

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

##### Customer Warranty - Title to Wastes

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

##### Customer Warranty - Compliance with Laws

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

##### Customer Warranty - Updating Information

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

##### Customer Indemnity

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

##### Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

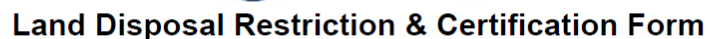
##### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

##### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.





Uniform Manifest No.: LDR Page of

[illegible]

**Title:**

Date: \_\_\_\_\_



US Ecology Tampa  
CHAIN OF CUSTODY RECORD  
Telephone: (813) 319-3400 Internet: www.usecology.com

To: \_\_\_\_\_  
Address: \_\_\_\_\_  
Attention: \_\_\_\_\_

From: \_\_\_\_\_  
Sampler: \_\_\_\_\_  
Contact: \_\_\_\_\_  
Phone #: \_\_\_\_\_

Profile Number	Collection Date	Sample Description (Matrix, Grab/Composite)	# Containers/Type	Size	Analysis Requested

Relinquished by: \_\_\_\_\_ Date: \_\_\_\_\_ Accepted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Relinquished by: \_\_\_\_\_ Date: \_\_\_\_\_ Accepted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Relinquished by: \_\_\_\_\_ Date: \_\_\_\_\_ Accepted by: \_\_\_\_\_ Date: \_\_\_\_\_

Lab Use Only	
Yes	No
Cold Pack	_____
Headspace	_____
Intact	_____

Hazards Associated with Sample	
Flammable	_____
Corrosive	_____
Highly Toxic	_____
Other	_____

Comments



**US ECOLOGY - TAMPA**  
7202 East 8<sup>th</sup> Ave, Tampa, FL 33619 TEL: 813 319-3400 FAX: 813 628-0842

### CONTAINER CONTENTS



Drum #	Date:		Approval #:	Chemist:
Proper DOT Shipping Name:				
Hazard Class:	Packaging Group: I II III	UN / NA Number:	Container type: DM DF CF 5 15 30 55 85 CYB	
Manifest #:				
	Material Description	Quantity	Size	EPA Waste Code
01				
02				
03				
04				
05				
06				
07				
08				
09				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
Facility Chemist Verification _____ This Lab Pack list continues: Yes <input type="checkbox"/> No <input type="checkbox"/> This is page _____ of _____.				

WHITE - TSDF      CANARY - CUSTOMER      PINK - DRUM COPY  
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Form: OPS-FM-008-FLA      Effective Date: 12/30/15



**EQ Florida, Inc.**  
**Container Log - Process**

Manifest/BOL: _____		Manifest Line ID: _____		Receipt ID: _____	
Truck No.: _____				Date: _____	
Transporter: _____		_____ of _____		Arrival Time: _____	
Generator: _____		(# Container Logs per Truck)		Scheduled Time: _____	
Approval: _____		DDVOC: 0      CCVOC: 0		Non-Bulk Total Quantity: _____	
Waste Common Name: _____		Approval Comments: _____		Waste:      Containers:      Quantity: _____	
Treatment: _____		Spec Hand Instruct: _____			
Manifest Comments: _____					
<div style="border: 1px solid black; padding: 2px; display: inline-block;">T</div> Secondary Waste Codes: _____					

C o n t #	Actual Container Received					Plant	Compatibility			Treatment Tank Disposal					Comments	BarCode
	Size	Type	Weight	Liquid	Solid		Tank#	Date	Chemist	Tank#	Qty	Date	Time	Emp.		
1																
2																



---

**STANDARD OPERATING PROCEDURE (FL)**

---

Document Number:	OPS-OP-016-FLA	Issue Date:	12/5/07
Author:	Stuart Stapleton	Revision Date:	9/16/14
Job Title:	EHS Manager	Department:	OPS

---

**TITLE:**        **Liquids Bulking**

**PURPOSE:** To safely and correctly consolidate liquids into bulk 55 gal containers for ultimate disposal.

**SCOPE:** This procedure applies to US Ecology Tampa offices and jobsites.

**RESPONSIBILITIES:**

Operations Manager:

The Operations Manager is responsible for ensuring the success of this procedure and for all operations under his control.

The Operations Manager or his/her designee shall monitor the employees periodically to ensure they provide their employees with sufficient training and equipment to allow them to both understand and comply with this procedure.

EHS Manager:

The EHS Manager is responsible for providing technical information and ensuring a safe and healthy working environment.

Employees:

Employees are responsible for compliance with the requirements of this procedure.

---

**PROCEDURE:**

- 1.0    Stage all containers that are going to be processed into a process row.
- 2.0    Check all E.P.A. waste codes. Using a handheld bar code scanner, scan each container to appropriate staging row.
- 3.0    Set up Visqueen and solid waste bin at the dock.

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- 3.1 Set up an empty drum to pour into.
  - 3.2 Place a funnel on top of the drum.
  - 3.3 Ground the drum with a grounding cable.
  - 3.4 Set up a slash pail.
  
  - 4.0 Gear up in proper protective equipment (Tyvek, gloves & respirator) and open the first container.
  
  - 5.0 Remove container contents of drum onto cart and open one container at a time.
  
  - 6.0 Splash several ounces into a 5-gallon splash pail to ensure compatibility (if incompatible do not pour into drum. See a Chemist or Supervisor for assistance). Once you have ensured compatibility, pour the contents into the drum funnel.
  
  - 7.0 When the drum is  $\frac{3}{4}$  full, close the container and label with the proper waste and D.O.T. labels.
  
  - 8.0 Secure the lid and the ring and move the drum to an appropriate storage location. If the container is warm, loosen the bung until the container has cooled off.
  
  - 9.0 Repeat steps 5 & 6 until task is complete.
- 

**DEFINITIONS:**

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**REFERENCES:**

**ASSOCIATED DOCUMENTS:**

**RECORDS:** The cited records are retained in a manner that supports the requirements of the various local, State, and federal regulatory agencies to which US Ecology adheres.

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**MANAGEMENT PROCEDURE (FL)**

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Document Number:	LAB-OP-008-FLA	Issue Date:	12/3/07
Author:	Stuart Stapleton	Revision Date:	8/19/15
Job Title:	QEHS Manager	Department:	LAB

---

**TITLE:**       **Facility Waste Sampling**

**PURPOSE:** To ensure all incoming containers are properly marked and a representative sample is collected from each container.

**SCOPE:** This procedure applies to US Ecology Tampa offices and jobsites.

**RESPONSIBILITIES:**

Plant Manager:

The Plant Manager is responsible for ensuring the success of this procedure and for all operations under his control.

The Plant Manager or his/her designee shall monitor the employees periodically to ensure they provide their employees with sufficient training and equipment to allow them to both understand and comply with this procedure.

QEHS Manager:

The QEHS Manager is responsible for providing technical information and ensuring a safe and healthy working environment.

Employees:

Employees are responsible for compliance with the requirements of this procedure.

---

**PROCEDURE:**

- 1.0 Proceed to sampling area with sampling cart and set-up area (be sure drums are diked and separate from incompatibles and appropriate signs are in place per the permit requirements).
- 2.0 Prepare sample jars by placing one on each drum to be sampled. Mark sample lids and jars with LAB number, DOT hazard class, DATE sampled, and sampler's initials.

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- 3.0 Put on appropriate safety equipment (**Level C**). Respiratory protection must be worn when opening any container.
- 4.0 Visually inspect the drums for integrity and proper RCRA, DOT and non-regulated labeling. Document container types and count for any discrepancies.
- 5.0 **Liquid and sludge sample:**
  - 5.1 Open the drum carefully, and slowly insert the sampling tube vertically until it reaches the bottom of the liquid portion.
  - 5.2 Cover the top of the tube with the thumb and form a vacuum, and carefully withdraw the tube.
  - 5.3 Collect the sample and drain the contents into a sample container.
  - 5.4 When sampling evacuated aerosol liquid drums, open bung(s) slowly and allow drum to vent at least 10 minutes. Use a self-filling Colowasa, to prevent possible back pressure. Collect sample and let contents drain into sample container.
- 6.0 **Solid sample:**
  - 6.1 Open the drum, dig down at least two inches and take a sample.
- 7.0 If the drum contains liquids and solid parts, check the percent solid and liquid using the sampling tube and obtain the percent solids by sampling the bottom of the drum. The amount of solids and liquid portions should be described in inches.
- 8.0 Composite samples will be prepared in the drum area from the individual drum samples. Composites will be composed of individual samples, not to exceed 10 sub-samples per composite.
- 9.0 Poison drums will not be analyzed in our QC lab until a separate system is established. Poison drums should be opened and inspected and checked using a pH test strip.
- 10.0 Close container immediately after sampling.
- 11.0 Bring the samples and receiving report to the lab and notify lab personnel of any discrepancies upon delivery of samples.
- 12.0 Place drums in their appropriate storage location according to hazard class and remove sampling signs.

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- 13.0 If any problems or questions arise, contact your supervisor or the Lab Manager immediately.
  - 14.0 DO NOT START TO BULK / OR LOAD ANY DRUM WITHOUT THE APPROVAL OF THE LAB MANAGER OR FACILITY MANAGER.
  - 15.0 In the event a modification from the above procedure is requested, the Laboratory Manager or the Facility Manager must approve it.
  - 16.0 All samplers using the above procedure must be trained and documented by the Lab Manager or the Facility Manager, or an experienced trainer as designated by the Laboratory Manager.
  - 17.0 If sampling a Tanker, Sludge Box, Vacuum Truck, following above procedure except use a core auger sampler for the taking the sample.
  - 18.0 The following waste types will receive a visual inspection only:
    - 18.1 Propane Cylinders
    - 18.2 Other gas Cylinders
    - 18.3 Aerosol Cans
    - 18.4 State of Florida Universal Waste
    - 18.5 Labpacks
    - 18.6 PCB Waste
  - 19.0 Samples that fail QC will be put on hold in EQAI.
  - 20.0 The EQAI Post Inspection Sheet will be used to verify that each receipt/approval is sampled in accordance with this procedure.
- 

#### **DEFINITIONS:**

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#### **REFERENCES:**

#### **ASSOCIATED DOCUMENTS:**

**RECORDS:** The cited records are retained in a manner that supports the requirements of the various local, State, and federal regulatory agencies to which US Ecology adheres.

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### ***Standard Operating Procedure***

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Document Number:	OPS-OP-071-FLA	Issue Date:	11/14/14
Author:	Stuart Stapleton, Rich Ascough	Revision Date:	2/5/16
Job Title:	EHS Manager, Approvals Coordinator	Department:	Operations

---

**TITLE:** Hazardous Waste Treatment

**PURPOSE:** To ensure proper handling of all materials entering the hazardous waste treatment process and confirm that operations are performed in a safe, compliant, and efficient manner.

**SCOPE:** The procedure applies to the following activities that take place in the Hazardous Waste Treatment Tank in the Waste Processing Building. Off-loading and temporary staging of hazardous waste, addition of hazardous waste, and chemical reagents into the tank, post process cleaning of the treatment tank and excavator bucket, and sampling and analysis of the completed batch

---

**RESPONSIBILITIES:**

Operations Manager: The Operations Manager is responsible for the development, training, implementation, monitoring, and periodic review of this procedure.

The Operations Manager or designee shall monitor all affected employees periodically to ensure proper compliance with this procedure. Employees will be provided with sufficient training and equipment to allow them to both understand and comply with this SOP.

Employees: Employees are responsible for complying with, and following, the hazardous stabilization SOP. Employees must also take an active role in the periodic review and improvement of the procedure.

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OPS-OP-071-FLA

Page 1 of 8

Effective Date: 2/11/2016



## 1. General

1.1. The following hazardous waste codes are permitted for hazardous waste treatment:

1.1.1. **D002**

1.1.2. **D004**

1.1.3. **D005**

1.1.4. **D006**

1.1.5. **D007**

1.1.6. **D008**

1.1.7. **D009** (Low Mercury as defined in 40 CFR 268 Subpart D)

1.1.8. **D010**

1.1.9. **D011**

1.2. The following treatment groups are permitted for hazardous waste treatment:

1.2.1. **1012** AL Chrome-Neut/Stab-Sub D

1.2.2. **1016** AL Min-Neut/Stab-Sub D

1.2.3. **1006** AH Min-Neut/Stab-Sub D

1.2.4. **1023** AOrg-Neut/Stab-Sub D

1.2.5. **1358** ASolid-NeutralSP-Sub D

1.2.6. **1415** AMix-NeutralSP-Sub D

1.2.7. **1014** AL HF-Neut/Stab-Sub D

1.2.8. **1018** AL Nitric-Neut/Stab-Sub D

1.2.9. **1035** BLiquid-Neut/Stab-Sub D

1.2.10. **1366** BSludge-Neut/Stab-Sub D

1.2.11. **1547** BAmmonia-Neut/Stab-Sub D

1.2.12. **1035** BDegrease-Neut/Stab-Sub D

1.2.13. **1625** BSolid-NeutralSP-Sub D

1.2.14. **1052** CMet Liq-Stab-Sub D

1.2.15. **1057** CMet Sol-Stab-Sub D

1.2.16. **1125** KAcid-Dpack-Sub D

1.2.17. **1129** KBase-Dpack-Sub D

1.2.18. **1156** KToxic-Dpack-Sub D

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1.3. The Personal Protective Equipment Program (EHS-PR-019-COR) and the Respiratory Protection Program (EHS-PR-029-COR) must be adhered to for all treatment operations. At a minimum the following levels are required for the following treatment operations:

- 1.3.1. Sampling – Level C
- 1.3.2. Processing Containers – Level C
- 1.3.3. Treatment – Level C
- 1.3.4. Off-loading bulk containers into treatment tank – Level C
- 1.3.5. Loading bulk containers after treatment – Level C
- 1.3.6. Housekeeping - Level D
- 1.3.7. Off-loading container trailers – Level D
- 1.3.8. Daily Inspection – Level D

1.4. The waste processing area and treatment tank must be inspected daily using the Waste Processing Building Inspection Log (OPS-FM-017-FLA).

## **2. Container Selection and Preparation**

2.1. Candidate containers of hazardous waste potentially amenable for treatment in the on-ground hazardous waste treatment tank are selected from the current inventory and reviewed by the Operations Manager prior to compatibility and bench testing in the on-site lab.

2.2. Collect a representative sample from each of the selected candidate containers and forward them to the lab for compatibility and bench testing.

2.2.1. Liquids – 100% of each wastestream's containers; and

2.2.2. Solids – 10% of each wastestream's containers.

2.3. Complete the Treatment Container Log (OPS-FM-098-FLA) for each selected container. The Treatment Container Log includes the following information:

- 2.3.1. Shipping Name;
- 2.3.2. Trailer Number;
- 2.3.3. HazBox Tracking Number;
- 2.3.4. Start Date;
- 2.3.5. Stock Receipt Number;
- 2.3.6. Approval Number;
- 2.3.7. Weight;
- 2.3.8. Size;
- 2.3.9. Waste Codes;
- 2.3.10. Treatment Group; and

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2.3.11. Technician Initials.

2.4. Using an approved scanner, scan each container's barcode and enter the container's data into a newly created staging row in EQAI.

2.4.1. The trailer ID# of the trailer being loaded shall be used when naming newly created staging rows.

2.5. Load the containers onto the designated trailer for transportation to the Waste Processing Building.

2.6. Count the containers on the trailer and verify that the count matches all of containers identified on the Treatment Trailer Log and the new staging row.

2.7. Attach the Treatment Trailer ID Tag (OPS-FM-087-FLA) on the front of the trailer indicating the following:

2.7.1. Trailer #; and

2.7.2. Start Date.

2.8. The Operations Manager, or designee, must review and approve the Treatment Container Log prior to releasing the trailer for transportation to the Waste Processing Building.

2.9. When the Operations Manager releases the Treatment Trailer, complete the Treatment Trailer ID Tag with the following:

2.9.1. Container Count; and

2.9.2. Total Gallons

### **3. Bench Testing**

3.1. The bench testing determines waste compatibility and the prescribed sequence that the waste and reagents are added to the treatment tank in order to ensure complete treatment. This sequence shall be followed when adding the waste containers to the treatment tank. During this process a Bench Test Log (LAB-FM-050-FLA) is completed to track pH, Reagents added, Temperature, and description of the reaction.

3.2. The bench testing results shall be distributed by the QA/QC Chemist to the Operations Manager, EHS Manager, Operations Supervisor, and Waste Processing Lead Coordinator for review.

3.3. Based on the bench test results, pH monitoring, and established solubility curves, a Treatment Processing Sheet (OPS-FM-088-FLA) is developed.

3.4. The approved Treatment Processing Sheet is forwarded to the Waste Processing Lead Coordinator for processing.

### **4. Staging and Verification**

4.1. After the Operations Manager, or designee, has released the trailer, move the trailer to the Waste Processing Building.

4.2. Off-load the trailer and stage the containers in the Waste Processing Building.

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- 4.2.1. The containers must be segregated by hazard class.
- 4.2.2. Once the containers have been staged, they must be processed within 24 hours.
- 4.3. The Waste Processing Lead Coordinator creates a batch in EQAI.
  - 4.3.1. A Waste Processing Technician, shall scan each container's barcode and enter the container's data into the newly created batch in EQAI.
    - 4.3.1.1. EQAI will give an error message for any treatment groups and/or waste codes that are not permitted to be processed.
    - 4.3.1.2. Containers that trigger an error are isolated and sent back to the Container Storage Building for review.
  - 4.3.2. The Waste Processing Lead Coordinator, or designee, shall print a copy of the EQAI Batch Detail Report once the data has been entered.
  - 4.3.3. Count the off-loaded containers and verify that the count matches the containers identified on the Treatment Trailer Log and the printed EQAI Batch Detail Report.
- 4.4. The Waste Processing Lead Coordinator, or designee, must review the following documents prior to approving the batch containers for treatment:
  - 4.4.1. Treatment Container Log; and
  - 4.4.2. The EQAI Batch Detail Report.
- 4.5. Once the batch has been approved for treatment, the Waste Processing Lead Coordinator, or designee, must sign the Treatment Container Log acknowledging their review.

## 5. Processing

- 5.1. The waste and reagents are placed in the treatment tank as prescribed by the approved Treatment Processing Sheet and thoroughly mixed to a uniform and homogenous consistency using an excavator.
  - 5.1.1. Fugitive particulate air emissions while handling dusty materials may be controlled using the following methods;
    - 5.1.1.1. Water can be added to the mixing container prior to materials being introduced, water can be added to the containers prior to introduction to the mixing container, or a fine spray mist over the hazardous waste treatment tank when charging the batch. Dusty wastes should be introduced and mixed in a manner that helps reduce the amount of dust emission. During high winds where particulate matter not feasible to control, processing should cease.
  - 5.1.2. The bucket of the excavator shall be decontaminated before use in the solidification tank for non-regulated waste processing. To be considered "clean" the bucket must be free of residual contaminants

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on the surface. The use of tools such as a water hose or power washer should be utilized. All decontamination procedures will be conducted over the hazardous waste treatment tank.

- 5.2. The treatment process is complete when all of the reagents have been added to the waste according to the recipe outlined on the Treatment Processing Sheet, the material has been mixed thoroughly, and all free liquids have been removed.
- 5.3. The Waste Processing Building Lead Coordinator, or designee, completes the Batch Processing Sheet (OPS-FM-092-FLA) after treatment in order to track time and material used. The completed Batch Processing Sheet is forwarded to the Operations Manager for review.
- 5.4. When the treatment is complete, a representative sample of the treated waste is collected and taken to the QA/QC Chemist, or designee.
  - 5.4.1. Using the Paint Filter Test Log (LAB-FM-004-FLA), the on-site lab conducts a Paint Filter Test, in accordance with Method 9095B, on the collected sample to demonstrate that the waste has no free liquids remaining in the mixture.
- 5.5. If the material fails the Paint Filter Test, additional reagent will be added to the mixture to ensure that all free liquids have been removed.
  - 5.5.1. Amend the Batch Processing Sheet to indicate the additional reagent that was added to the mixture.
  - 5.5.2. A new sample of the material shall be collected and retested.
- 5.6. If the material passes the Paint Filter Test:
  - 5.6.1. The remaining sample is prepared and sent off-site to a NELAP/NELAC certified lab for TCLP and UTS analysis.
  - 5.6.2. The treated waste is removed from the treatment tank and placed into roll-off boxes (usually 2-4 boxes per batch).
    - 5.6.2.1. Roll-off boxes must be lined prior to loading the treated waste into the roll-off box.
    - 5.6.2.2. Roll-off boxes must be properly tarped prior to exiting the Waste Processing Building and being placed in storage.
  - 5.6.3. A Treated Hazardous Waste ID tag (OPS-FM-091-FLA) is applied to each roll-off box in the batch. The ID tag identifies the roll-off box as hazardous waste pending analysis and includes the following information:
    - 5.6.3.1. Accumulation start date;
    - 5.6.3.2. HazBox Tracking #;
    - 5.6.3.3. Roll-off #; and
    - 5.6.3.4. The roll-off box container count (ex., 1 of X, 2 of X, etc.).

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- 5.7. Each roll-off box is moved from the Waste Processing Building and placed into storage within the 10-Day Transfer Facility/Inbound & Outbound Staging/Roll-Off Storage Area (SWMU 11).

## 6. Treatment Verification

- 6.1. When the TCLP results are received from the off-site lab (usually within 2-business days of sample submittal), the Operations Manager and designee must review the analytical results and determine whether the batch has been de-characterized and have met the Universal Treatment Standards (UTS).
- 6.2. If the analytical results indicate that the batch has failed for either the TCLP or UTS:
- 6.2.1. The batch and its associated roll-off boxes must maintain their original Treated Hazardous Waste ID tags.
  - 6.2.2. Remove the failed boxes immediately from the storage area and place them in the Waste Processing Building.
  - 6.2.3. A treatment recipe is developed based on the failed treatment analysis.
  - 6.2.4. Treat the waste in accordance with the recipe.
- 6.3. If the analytical results indicate that both the TCLP and UTS have been met, further treatment is not required and the Treated Hazardous Waste is now identified as Treated Non-Hazardous Waste.
- 6.3.1. Two approved designees must sign the Final Disposal Approval form (OPS-FM-089-FLA) to release the waste for final disposal. The Final Disposal Approval form contains the following information:
    - 6.3.1.1. Date;
    - 6.3.1.2. HazBox Tracking #
    - 6.3.1.3. Container #'s
  - 6.3.2. When the signed Final Disposal Approval has been received, the original Treated Hazardous Waste ID tags are removed from each roll-off box and replaced with Treated Non-Hazardous Waste ID tags (OPS-FM-096-FLA), which includes the following information:
    - 6.3.2.1. The accumulation start date;
    - 6.3.2.2. HazBox Tracking #
    - 6.3.2.3. Roll-off #; and
    - 6.3.2.4. The roll-off box container count (ex., 1 of X, 2 of X, etc.).
- 6.4. Generally, all treated non-hazardous waste is shipped off-site to an approved Subtitle D landfill within 10-business days of passing both the TCLP and UTS and being approved for final disposal.
- 6.5. Treated non-hazardous waste analytical results are supplied to the Subtitle D landfill upon request.

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## 7. Record Retention

7.1. All records associated with this SOP shall be collected, scanned into EQAI, and filed in the Waste Processing Lead Coordinator's office and made available for review upon request.

---

### • DEFINITIONS:

Treatment Reagents: Includes, but is not limited to, cement kiln dust (CKD), bed ash, fly ash, lime, bleach, water, ferrous sulfate, and sodium sulfide.

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**REFERENCES:** 40 CFR 268 Subpart D – Treatment Standards  
SW-846 - Test Methods for Evaluating Solid Waste,  
Physical/Chemical Methods  
Method 9095B – Paint Filter Liquids Test

### ASSOCIATED DOCUMENTS:

OPS-FM-017-FLA Waste Processing Building Inspection Log  
OPS-FM-098-FLA Treatment Container Log  
OPS-FM-087-FLA Treatment Trailer ID Tag  
LAB-FM-050-FLA Bench Test Log  
OPS-FM-088-FLA Treatment Processing Sheet  
LAB-FM-004-FLA Paint Filter Test Log  
OPS-FM-091-FLA Treated Hazardous Waste Roll-Off ID Tag  
OPS-FM-089-FLA Final Disposal Approval  
OPS-FM-096-FLA Non-Hazardous Waste Roll-Off ID Tag  
OPS-FM-097-FLA Roll-Off Containment Log  
OPS-FM-092-FLA Batch Processing Sheet  
OPS-FM-093-FLA Batch Retreat Processing Sheet

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**Work Instruction**

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Document Number:	OPS-WI-022-FLA	Issue Date:	4/20/16
Author:	Stuart Stapleton	Revision Date:	
Job Title:	EHS Manager	Department:	Operations

---

**TITLE:** Process Equipment and Treatment Tank Decontamination

**PURPOSE:** To ensure the appropriate steps are taken to decontaminate process equipment and the hazardous waste treatment tank.

**SCOPE:** All employees responsible for the decontamination of processing equipment and the hazardous waste treatment tank.

**RESPONSIBILITIES:**

Supervisor: To ensure that all practices and procedure are carried out in Compliance with the protocol.

Operator: To follow all practices and procedures specified in the protocol.

---

**PROCEDURE:**

**1. Contaminated Equipment Decontamination**

1.1. Working surfaces must be visually clean. This may be accomplished by:

- 1.1.1. Scraping using hand tools or power equipment.
- 1.1.2. Washing and/or power washing with water to effect a clean working surface.
- 1.1.3. All removed materials, and wash waters, must be processed as hazardous waste.

**2. Treatment Tank Decontamination**

2.1. Working surfaces must be visually clean. This may be accomplished by:

- 2.1.1. Scraping using hand tools or power equipment.
- 2.1.2. Washing and/or power washing with water to effect a clean working surface.
- 2.1.3. All removed materials, and wash waters, must be processed as hazardous waste.

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**DEFINITIONS:**

**Decontamination** – The removal of material from process equipment or tanks.

**Process Equipment** – Any piece of equipment used in the process of handling hazardous waste. This equipment includes, but is not limited to: excavator and backhoe buckets.

**Treatment Tank** – Permitted tank for hazardous waste processing.

---

**REFERENCES:**

**ASSOCIATED DOCUMENTS:**

**RECORDS:**

Date	Approver	Change





**EQ - THE ENVIRONMENTAL QUALITY COMPANY**

***Standard Operating Procedure***

Document Number:	OPS-OP-078-FLA	Issue Date:	5/11/16
Author:	Ken Dean	Revision Date:	
Job Title:	Ops. Manager	Department:	OPS

**TITLE:** Crack/Gap Program

**PURPOSE:** To identify and repair all visible cracks and gaps in the asphalt pavement located in the Bulk Container Storage Area (BCSA), 10-Day Transfer Facility, and the Inbound/Outbound (I/O) Staging Areas.

**SCOPE:** Applies to the asphalt pavement located in the Bulk Container Storage Area (BCSA), 10-Day Transfer Facility, and the Inbound/Outbound (I/O) Staging Areas.

**RESPONSIBILITIES:**

EHS Manager: Responsible for coordinating the "Cracks & Gaps" program.

Operations Manager: Responsible for ensuring that daily inspections are completed and indicate any cracks in the Bulk Container Storage Area (BCSA), the 10-Day Transfer Facility AND the Inbound/Outbound (I/O) Staging Area inspection form.

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**PROCEDURE:**

**Crack/Gap Identification:**

1. Indicate the location of the crack/gap on the Bulk Container Storage Area (BCSA), Waste Process Building (WPB), 10-Day Transfer Facility and the Inbound/Outbound (I/O) Staging Area inspection form (OPS-FM-017-FLA).

**Crack/Gap Repair and Recordkeeping:**

1. Repair of identified crack/gap is to be prioritized based on severity, risk to the environment, employee health and safety, and/or asset protection. In some instances (e.g., large surface area, severe damage), asphalt may be replaced.
2. The date and the material used to fill the crack/gap is to be recorded on the inspection form.

*The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.*

3. Each crack/gap in need of repair will have asphalt patch/caulk applied in a sufficient amount to eliminate the crack/gap.

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**DEFINITIONS:**

Crack /Gap: A disturbance in the asphalt pavement surface that indicates excessive wear, gouges, pitting, or exposed base. This does not include superficial surface disturbances.

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**REFERENCES:**

**ASSOCIATED DOCUMENTS:** OPS-FM-017-FLA

**RECORDS:** The cited records are retained in a manner that supports the requirements of the various local, State, and federal regulatory agencies to which EQ adheres.

*The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.*

## **APPENDIX K**

### ***In-Bound Waste Shipment Records & Waste Characterization Reports***

Inbound Containers Summary by Treatment, Size (CY 2015)			
<b>22- EQ Florida, Inc.</b>			
<b>00-EQ Florida, Inc.</b>			
<b>Treatment:</b>	<b>1006 AH Min-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	5	219.000
	DM15 Containers	4	689.000
	DM30 Containers	8	2,468.000
	DM55 Containers	116	43,917.000
	DM85 Containers	3	1,999.000
	LBS Containers	4	2,026.000
	T275 Containers	88	214,538.000
	<b>Total # Containers for Treatment 1006 AH Min-Neut/Stab-Sub D:</b>	<b>228</b>	<b>265,856.000</b>
<b>Treatment:</b>	<b>1007 AH Min-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	15	339.000
	DM15 Containers	3	294.000
	DM30 Containers	2	110.000
	DM55 Containers	21	9,888.000
	DM85 Containers	1	573.000
	LBS Containers	1	541.000
	T275 Containers	25	94,465.000
	<b>Total # Containers for Treatment 1007 AH Min-Tranship-TSD:</b>	<b>68</b>	<b>106,210.000</b>
<b>Treatment:</b>	<b>1010 AH Nitric-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM55 Containers	3	1,423.000
	T275 Containers	1	2,486.000
	<b>Total # Containers for Treatment 1010 AH Nitric-Tranship-TSD:</b>	<b>4</b>	<b>3,909.000</b>
<b>Treatment:</b>	<b>1012 AL Chrome-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM30 Containers	1	191.000
	<b>Total # Containers for Treatment 1012 AL Chrome-Neut/Stab-Sub D:</b>	<b>1</b>	<b>191.000</b>
<b>Treatment:</b>	<b>1014 AL HF-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM30 Containers	1	138.000
	DM55 Containers	2	822.000
	<b>Total # Containers for Treatment 1014 AL HF-Neut/Stab-Sub D:</b>	<b>3</b>	<b>960.000</b>
<b>Treatment:</b>	<b>1015 AL HF-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	1	39.000
	DM15 Containers	2	295.000
	DM55 Containers	10	4,861.000

	LBS Containers	5	187.000
	T275 Containers	18	40,333.000
	<b>Total # Containers for Treatment 1015 AL HF-Tranship-TSD:</b>	<b>36</b>	<b>45,715.000</b>
<b>Treatment:</b>	<b>1016 AL Min-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	Missing Container Size	14	21,811.000
	DM05 Containers	18	2,882.000
	DM15 Containers	12	1,656.000
	DM30 Containers	12	2,939.000
	DM55 Containers	328	150,827.000
	DM85 Containers	9	1,670.000
	LBS Containers	74	464.000
	T250 Containers	21	48,469.000
	T275 Containers	226	552,535.000
	<b>Total # Containers for Treatment 1016 AL Min-Neut/Stab-Sub D:</b>	<b>714</b>	<b>783,253.000</b>
<b>Treatment:</b>	<b>1017 AL Min-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	16	1,793.000
	DM15 Containers	7	1,213.000
	DM30 Containers	7	1,446.000
	DM55 Containers	30	11,718.000
	DM85 Containers	1	480.000
	GAL Containers	3	0.000
	LBS Containers	162	1,523.670
	T250 Containers	3	7,736.000
	T275 Containers	12	30,068.000
	<b>Total # Containers for Treatment 1017 AL Min-Tranship-TSD:</b>	<b>241</b>	<b>55,977.670</b>
<b>Treatment:</b>	<b>1018 AL Nitric-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	1	45.000
	DM15 Containers	1	49.000
	DM30 Containers	1	211.000
	DM55 Containers	50	21,697.000
	T250 Containers	6	16,393.000
	T275 Containers	11	24,846.000
	<b>Total # Containers for Treatment 1018 AL Nitric-Neut/Stab-Sub D:</b>	<b>70</b>	<b>63,241.000</b>
<b>Treatment:</b>	<b>1019 AL Nitric-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM15 Containers	1	119.000
	DM55 Containers	10	4,098.000
	T275 Containers	1	2,585.000
	<b>Total # Containers for Treatment 1019 AL Nitric-Tranship-TSD:</b>	<b>12</b>	<b>6,802.000</b>
<b>Treatment:</b>	<b>1023 AOrg-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>

	DM55 Containers	9	5,306.000
	<b>Total # Containers for Treatment 1023 AOrg-Neut/Stab-Sub D:</b>	<b>9</b>	<b>5,306.000</b>
<b>Treatment:</b>	<b>1034 BLiquid-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	Missing Container Size	1	47.000
	CYB Containers	1	942.000
	DM05 Containers	33	1,076.000
	DM15 Containers	19	2,399.000
	DM30 Containers	24	4,407.000
	DM55 Containers	23	8,386.000
	GAL Containers	2	0.000
	LBS Containers	164	20,036.780
	PALL Containers	1	1,974.000
	<b>Total # Containers for Treatment 1034 BLiquid-Tranship-TSD:</b>	<b>268</b>	<b>39,267.780</b>
<b>Treatment:</b>	<b>1035 BLiquid-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	13	480.000
	DM15 Containers	6	790.000
	DM20 Containers	3	448.000
	DM30 Containers	6	1,005.000
	DM55 Containers	117	52,800.000
	DM85 Containers	7	3,293.000
	KG Containers	9	19,985.000
	LBS Containers	28	1,242.000
	T275 Containers	97	262,432.000
	<b>Total # Containers for Treatment 1035 BLiquid-Neut/Stab-Sub D:</b>	<b>286</b>	<b>342,475.000</b>
<b>Treatment:</b>	<b>1052 CMet Liq-Stab-Sub D (D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	Missing Container Size	3	1,451.000
	DM05 Containers	8	263.000
	DM15 Containers	4	509.000
	DM30 Containers	22	4,947.000
	DM55 Containers	438	210,669.000
	DM85 Containers	20	5,923.000
	GAL Containers	6	7,421.000
	LBS Containers	7	3,013.000
	T275 Containers	45	108,637.000
	<b>Total # Containers for Treatment 1052 CMet Liq-Stab-Sub D:</b>	<b>553</b>	<b>342,833.000</b>
<b>Treatment:</b>	<b>1053 CMet Liq-Tranship-TSD (D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	CNT Containers	1	0.000
	DM05 Containers	36	646.980
	DM15 Containers	6	535.000
	DM30 Containers	23	5,469.000
	DM55 Containers	141	64,288.000
	LBS Containers	5	1,020.670

	T275 Containers	9	23,232.000
	<b>Total # Containers for Treatment 1053 CMet Liq-Tranship-TSD:</b>	<b>221</b>	<b>95,191.650</b>
<b>Treatment:</b>	<b>1056 CMet Sol-Consolidat-TSD (D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	CYB Containers	40	7,252.000
	DM05 Containers	5	58.000
	DM15 Containers	2	51.000
	DM30 Containers	4	170.000
	DM55 Containers	30	3,665.000
	LBS Containers	19	1,422.000
	<b>Total # Containers for Treatment 1056 CMet Sol-Consolidat-TSD:</b>	<b>100</b>	<b>12,618.000</b>
<b>Treatment:</b>	<b>1057 CMet Sol-Stab-Sub D (D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	BULB Containers	6	2,649.000
	CYB Containers	268	294,837.000
	DM05 Containers	26	355.330
	DM15 Containers	7	318.000
	DM30 Containers	18	1,354.000
	DM55 Containers	1114	453,789.000
	DM85 Containers	6	3,395.000
	DM95 Containers	19	8,763.000
	LBS Containers	228	6,533.000
	TONS Containers	14	35,059.920
	<b>Total # Containers for Treatment 1057 CMet Sol-Stab-Sub D:</b>	<b>1706</b>	<b>807,053.250</b>
<b>Treatment:</b>	<b>1058 CMet Sol-Tranship-TSD (D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	Missing Container Size	1	0.000
	DM05 Containers	32	350.000
	DM30 Containers	3	145.000
	DM55 Containers	91	29,249.000
	LBS Containers	397	2,553.770
	<b>Total # Containers for Treatment 1058 CMet Sol-Tranship-TSD:</b>	<b>524</b>	<b>32,297.770</b>
<b>Treatment:</b>	<b>1125 KAcid-Dpack-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	24	254.000
	DM15 Containers	5	286.000
	DM30 Containers	10	631.000
	DM55 Containers	137	22,029.000
	DM85 Containers	3	620.000
	GAL Containers	30	3,517.000
	LBS Containers	72	12,204.000
	<b>Total # Containers for Treatment 1125 KAcid-Dpack-Sub D:</b>	<b>281</b>	<b>39,541.000</b>
<b>Treatment:</b>	<b>1128 KAcid-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>

	Missing Container Size	4	377.000
	CYB Containers	1	689.000
	DM05 Containers	880	8,322.500
	DM10 Containers	9	273.000
	DM12 Containers	4	139.000
	DM15 Containers	35	1,402.000
	DM20 Containers	2	105.000
	DM30 Containers	88	5,197.000
	DM55 Containers	246	42,964.000
	GAL Containers	25	3,111.000
	LBS Containers	110	14,040.000
	<b>Total # Containers for Treatment 1128 KAcid-Tranship-TSD:</b>	<b>1404</b>	<b>76,619.500</b>
<b>Treatment:</b>	<b>1129 KBase-Dpack-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	74	225.000
	DM15 Containers	4	190.000
	DM30 Containers	8	596.000
	DM55 Containers	225	36,112.000
	GAL Containers	37	5,931.000
	LBS Containers	55	7,797.000
	<b>Total # Containers for Treatment 1129 KBase-Dpack-Sub D:</b>	<b>403</b>	<b>50,851.000</b>
<b>Treatment:</b>	<b>1132 KBase-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	Missing Container Size	1	151.000
	CYB Containers	2	1,873.000
	DM05 Containers	825	3,858.980
	DM10 Containers	5	115.000
	DM12 Containers	5	212.000
	DM15 Containers	17	672.000
	DM20 Containers	5	184.000
	DM30 Containers	74	4,864.000
	DM55 Containers	218	33,499.000
	GAL Containers	29	4,220.000
	LBS Containers	92	10,943.000
	PALL Containers	1	696.000
	<b>Total # Containers for Treatment 1132 KBase-Tranship-TSD:</b>	<b>1274</b>	<b>61,287.980</b>
<b>Treatment:</b>	<b>1156 KToxic-Dpack-Sub D (D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	13	155.000
	DM30 Containers	4	183.000
	DM55 Containers	9	977.000
	GAL Containers	3	28.000
	LBS Containers	6	203.000
	<b>Total # Containers for Treatment 1156 KToxic-Dpack-Sub D:</b>	<b>35</b>	<b>1,546.000</b>
<b>Treatment:</b>	<b>1162 KToxic-Tranship-TSD (D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>



	CNT Containers	1	8.000
	DM05 Containers	122	1,285.000
	DM15 Containers	4	158.000
	DM30 Containers	20	1,298.000
	DM55 Containers	28	4,808.000
	FOOT Containers	1	34.000
	GAL Containers	1	287.000
	LBS Containers	17	243.000
	<b>Total # Containers for Treatment 1162 KToxic-Tranship-TSD:</b>	<b>194</b>	<b>8,121.000</b>
<b>Treatment:</b>	<b>1358 ASolid-NeutralSP-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM55 Containers	3	732.000
	LBS Containers	602	4,536.510
	<b>Total # Containers for Treatment 1358 ASolid-NeutralSP-Sub D:</b>	<b>605</b>	<b>5,268.510</b>
<b>Treatment:</b>	<b>1366 BSludge-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM55 Containers	1	638.000
	<b>Total # Containers for Treatment 1366 BSludge-Neut/Stab-Sub D:</b>	<b>1</b>	<b>638.000</b>
<b>Treatment:</b>	<b>1370 BAMmonia-Tranship-TSD (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM55 Containers	7	3,200.000
	LBS Containers	45	4,444.400
	<b>Total # Containers for Treatment 1370 BAMmonia-Tranship-TSD:</b>	<b>52</b>	<b>7,644.400</b>
<b>Treatment:</b>	<b>1415 AMixed-NeutralSP-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	LBS Containers	29	947.000
	<b>Total # Containers for Treatment 1415 AMixed-NeutralSP-Sub D:</b>	<b>29</b>	<b>947.000</b>
<b>Treatment:</b>	<b>1547 BAMmonia-Neut/Stab-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM55 Containers	3	1,057.000
	<b>Total # Containers for Treatment 1547 BAMmonia-Neut/Stab-Sub D:</b>	<b>3</b>	<b>1,057.000</b>
<b>Treatment:</b>	<b>1625 BSolid-NeutralSP-Sub D (D002, D004-D011)</b>		
	<b>Container Size</b>	<b># Containers</b>	<b>Weight</b>
	DM05 Containers	6	28.000
	DM55 Containers	1	125.000
	LBS Containers	3	117.000
	<b>Total # Containers for Treatment 1625 BSolid-NeutralSP-Sub D:</b>	<b>10</b>	<b>270.000</b>



Profile Tracking # 185396

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

**US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.**

**If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:**

**Waste Common Name:** CORROSIVE LIQUIDS/SOLIDS (ALKALINE).

#### Section 1 - Generator & Customer Information

<b>Generator EPA ID #</b> <u>FLD-981-932-494</u>	<i>Internal Use Only: EQ Division</i>
<b>Generator</b> <u>EQ FLORIDA, INC.</u>	<b>EQ Customer No.</b> <u>6696</u>
<b>Facility Address</b> <u>2002 N. ORIENT ROAD</u>	<b>Invoicing Company</b> <u>EQ FLORIDA INC</u>
<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>	<b>Address</b> <u>7202 EAST 8TH AVENUE</u>
<b>24-hour Emergency Response Number</b> <u>(813) 319-3402</u>	<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>
	<b>Country</b> <u>USA</u>
<b>Mailing Address</b> <u>7202 EAST 8TH AVENUE</u>	<b>Invoicing Contact</b> <u>DENA EVERHARDT</u>
<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>	<b>Phone</b> <u>(813) 623-5302xt227</u> <b>Fax</b> <u>(813) 626-7451</u>
<b>Generator Contact</b> <u>Ken Dean</u>	<b>Technical Contact</b> <u>Ken Dean</u>
<b>Title</b> <u>Operations Manager</u>	<b>Phone</b> <u>(813) 319-3433</u> <b>Fax</b> <u>(813) 622-8765</u>
<b>Phone</b> <u>(813) 319-3433</u> <b>Fax</b> <u>(813) 622-8765</u>	<b>Cell Phone</b> <u>( ) -</u>
<b>E-mail</b> <u>Ken.Dean@usecology.com</u>	<b>E-mail</b> <u>Ken.Dean@usecology.com</u>

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: Varies

b) Frequency: ☐ One Time ☒ Month ☐ Quarter ☐ Year ☐ Other \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:  
RQ, UN3266, Waste, Corrosive liquid, basic, inorganic, n.o.s., 8, PGII, (D002), ERG #154

#### Section 3 - Special Properties

3.1) Color VARIES

3.2) Odor ☒ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia  
☐ Other: \_\_\_\_\_

3.3) Consistency at 70 °F: ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☐ Liquid ☐ Gas/Aerosol ☒ Varies

3.4) What is the pH? ☐ ≤2 ☐ 2.1-4.9 ☒ 5-10 ☒ 10.1-12.4 ☒ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos -non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

Caustic Solutions including:	0. to	0. %
Sodium and/ or Potassium Hydroxide	95. to	100. %
Ammonium Hydroxide	0. to	5. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

Ammonium hydroxide solutions must be <5%. An accumulation of nonlisted caustic waste at a TSDF. Waste may be expired products or spent solutions. No metal powders/fines - no Be/Al/Zn/Mg dusts/fines/pieces. <5000 ppm Total RCRA/UHC metals. <2000 mg/kg Cr, <500 mg/kg Cd, <150 mg/kg As, <260 mg/kg Hg total, <10 mg/L Hg TCLP, <150 mg/kg Se, <150 mg/kg Sb. No free mercury. No Michigan codes.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☒ No

\*If yes, describe: \_\_\_\_\_

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption: \_\_\_\_\_

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☒ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002 D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No 0003110H 0006110H 0007319H

*If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.*

5.5) EPA Source Code: G61 EPA Form Code: W110

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS

*Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.*

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No  
(Debris is greater than 2.5 inches in size.)

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight: \_\_\_\_\_

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☒ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 212 Nickel, 213 Selenium, 214 Silver, 216 Thallium

*For a complete list of UHC constituents, please refer to 40 CFR 268.48*

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_

☐ Other, describe: \_\_\_\_\_

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☐ No
- \*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No
- If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No
- If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
- Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name Kenneth S. Dean

Company EQ Florida, Inc. Title Operations Manager Date \_\_\_\_\_



## STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

### Definitions

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

### Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

### Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

### Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

### Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

### Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

### Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

### Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

### Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

### Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # **192697**

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.

If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:

Waste Common Name: METAL CHARACTERISTIC SOLID/SLUDGES - NO DEBRIS.

#### Section 1 - Generator & Customer Information

Generator EPA ID # <b>FLD-981-932-494</b>	Internal Use Only: EQ Division _____
Generator <b>EQ FLORIDA, INC.</b>	EQ Customer No. <b>6696</b>
Facility Address <b>2002 N. ORIENT ROAD</b>	Invoicing Company <b>EQ FLORIDA INC</b>
City <b>TAMPA</b> State <b>FL</b> Zip <b>33619</b>	Address <b>7202 EAST 8TH AVENUE</b>
24-hour Emergency Response Number <b>(813) 319-3402</b>	City <b>TAMPA</b> State <b>FL</b> Zip <b>33619</b>
	Country <b>USA</b>
Mailing Address <b>7202 EAST 8TH AVENUE</b>	Invoicing Contact <b>DENA EVERHARDT</b>
City <b>TAMPA</b> State <b>FL</b> Zip <b>33619</b>	Phone <b>(813) 623-5302xt227</b> Fax <b>(813) 626-7451</b>
Generator Contact <b>Ken Dean</b>	Technical Contact <b>Ken Dean</b>
Title <b>Operations Manager</b>	Phone <b>(813) 319-3433</b> Fax <b>(813) 622-8765</b>
Phone <b>(813) 319-3433</b> Fax <b>(813) 622-8765</b>	Cell Phone <b>( ) -</b>
E-mail <b>Ken.Dean@usecology.com</b>	E-mail <b>Ken.Dean@usecology.com</b>

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: **Varies**

b) Frequency: ☐ One Time ☒ Month ☐ Quarter ☐ Year ☐ Other \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:  
**RQ, NA3077, Hazardous waste, solid, n.o.s., 9, PGIII, ERG #171**

#### Section 3 - Special Properties

3.1) Color **VARIES**

3.2) Odor ☒ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia  
☐ Other: \_\_\_\_\_

3.3) Consistency at 70 °F: ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☐ Liquid ☐ Gas/Aerosol ☒ Varies

3.4) What is the pH? ☐ ≤2 ☒ 2.1-4.9 ☒ 5-10 ☒ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos -non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

Soil/sludge/paint chips	0. to	100. %
fluorescent bulbs	0. to	100. %
rock/booms/ppe/debris	0. to	20. %
liquid/water	0. to	100. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

Residuals from various non-listed, metal process spills, sandblast, and or paint chips. No Metal fines. No aluminum, magnesium, or zinc dust. If D009, mercury must be less than 260 mg/kg. Nor Free Mercury. No Organic underlying hazardous constituents. Debris must be less than 50% of each load by volume. Based on visual inspection. No amine or ammonia bearing wastes. No pressurized containers and LDR will accompany each load. Identifying the concentrations of all underlying hazardous constituents.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☒ No

\*If yes, describe: \_\_\_\_\_

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption: \_\_\_\_\_

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☒ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No 0001307H 0002319H 0010319H 0010409H

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: G61 EPA Form Code: W101

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS

Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No  
(Debris is greater than 2.5 inches in size.)

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight: \_\_\_\_\_

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☒ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 214 Silver, 216 Thallium

For a complete list of UHC constituents, please refer to 40 CFR 268.48

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_

☐ Other, describe: \_\_\_\_\_

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☐ No  
\*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
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- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No  
If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
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If Yes, please specify: \_\_\_\_\_
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**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name Kenneth S. Dean

Company EQ Florida, Inc. Title Operations Manager Date \_\_\_\_\_



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##### Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

##### Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

##### Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

##### Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

##### Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

##### Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

##### Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

##### Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

##### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

##### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # 188444

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.

If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:

Waste Common Name: GENERIC ACID: CHROMIC ACIDS <30% CONCENTRATION

#### Section 1 - Generator & Customer Information

Generator EPA ID # FLD-981-932-494

Generator EQ FLORIDA, INC.

Facility Address 2002 N. ORIENT ROAD

City TAMPA State FL Zip 33619

24-hour Emergency Response Number (813) 319-3402

Mailing Address 7202 EAST 8TH AVENUE

City TAMPA State FL Zip 33619

Generator Contact Ken Dean

Title Operations Manager

Phone (813) 319-3433 Fax (813) 622-8765

E-mail Ken.Dean@usecology.com

Internal Use Only: EQ Division

EQ Customer No. 6696

Invoicing Company EQ FLORIDA INC

Address 7202 EAST 8TH AVENUE

City TAMPA State FL Zip 33619

Country USA

Invoicing Contact DENA EVERHARDT

Phone (813) 623-5302xt227 Fax (813) 626-7451

Technical Contact Ken Dean

Phone (813) 319-3433 Fax (813) 622-8765

Cell Phone ( ) -

E-mail Ken.Dean@usecology.com

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: Varies

b) Frequency: ☐ One Time ☐ Month ☐ Quarter ☒ Year ☐ Other

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:

RQ, UN3264, Waste, Corrosive liquid, acidic, inorganic, n.o.s., 8, PGII, (D002), ERG #154

#### Section 3 - Special Properties

3.1) Color VARIES

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia  
☒ Other: Mild

3.3) Consistency at 70 °F: ☒ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☒ ≤2 ☒ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos -non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

Chronic Acid Solution 100. to 100. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

Accumulation of nonlisted metal wastes by TSDF. Waste may include expired product or spent solution. No precursors to listed codes if WW treated. <5000ppm Total RCRA/UHC Metals, <2000 ppm Cr, <500 ppm Cd, <150 ppm As, <260 ppm Hg total, <150 ppm Se, <150 ppm Sb, <10 mg/L Hg TCLP. No organic codes/UHCs. No free mercury. No D001.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☐ No

\*If yes, describe:

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption:

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☐ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☐ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002 D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: G61 EPA Form Code: W103

5.6) Waste Code Determination Is Based On: ☐ Generator Knowledge ☐ Analysis ☐ MSDS

Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☐ No

c) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☐ No

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight:

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☒ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 212 Nickel, 213 Selenium, 214 Silver, 216 Thallium

For a complete list of UHC constituents, please refer to 40 CFR 268.48

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☐ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☐ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☐ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents:

☐ Other, describe:

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☐ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☒ No  
\*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No  
If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No  
If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
- Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name \_\_\_\_\_

Company \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_



#### STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

#### Definitions

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

#### Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

#### Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

#### Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

#### Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

#### Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

#### Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

#### Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

#### Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

#### Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

#### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

#### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # **161630**

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

**US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.**

**If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:**

**Waste Common Name:** GENERIC ACID: HYDROFLUORIC ACID SOLUTIONS <20%

#### Section 1 - Generator & Customer Information

**Generator EPA ID #** FLD-981-932-494

**Generator** EQ FLORIDA, INC.

**Facility Address** 2002 N. ORIENT ROAD

**City** TAMPA **State** FL **Zip** 33619

**24-hour Emergency Response Number** (813) 319-3402

**Mailing Address** 7202 EAST 8TH AVENUE

**City** TAMPA **State** FL **Zip** 33619

**Generator Contact** Ken Dean

**Title** Operations Manager

**Phone** (813) 319-3433 **Fax** (813) 622-8765

**E-mail** Ken.Dean@usecology.com

*Internal Use Only: EQ Division*

**EQ Customer No.** 6696

**Invoicing Company** EQ FLORIDA INC

**Address** 7202 EAST 8TH AVENUE

**City** TAMPA **State** FL **Zip** 33619

**Country** USA

**Invoicing Contact** DENA EVERHARDT

**Phone** (813) 623-5302xt227 **Fax** (813) 626-7451

**Technical Contact** Ken Dean

**Phone** (813) 319-3433 **Fax** (813) 622-8765

**Cell Phone** ( ) -

**E-mail** Ken.Dean@usecology.com

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: Varies

b) Frequency: ☐ One Time ☐ Month ☐ Quarter ☒ Year ☐ Other

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:

UN3264, Waste, Corrosive liquid, acidic, inorganic, n.o.s., 8, PGII, ERG #154

#### Section 3 - Special Properties

3.1) Color VARIES

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia

☒ Other: Mild

3.3) Consistency at 70 °F: ☒ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☒ ≤2 ☐ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos -non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

Hydrofluoric Acid Solutions 0. to 20. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

NO FUMING ACIDS. Acid concentration must be <20%. Accumulation of nonlisted hydrofluoric acid by TSDF. No U134 listed waste. <5000ppm Total RCRA/UHC Metals, <2000 ppm Cr, <500 ppm Cd, <150 ppm As, <260 ppm Hg total, <150 ppm Se, <150 ppm Sb, <10 mg/L Hg TCLP. No organic codes/UHCs. No free mercury. Mixtures with other acid types must be profiled separately.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☐ No

\*If yes, describe:

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption:

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☐ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☐ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002 D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No

*If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.*

5.5) EPA Source Code: G61 EPA Form Code: W103

5.6) Waste Code Determination Is Based On: ☐ Generator Knowledge ☐ Analysis ☐ MSDS

*Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.*

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☐ No

c) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☐ No

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight:

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☒ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 212 Nickel, 213 Selenium, 214 Silver, 216 Thallium

*For a complete list of UHC constituents, please refer to 40 CFR 268.48*

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☐ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☐ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☐ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents:

☐ Other, describe:

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☒ No
- \*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No
- If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No
- If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
- Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name \_\_\_\_\_

Company \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_



#### STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

##### Definitions

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

##### Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

##### Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

##### Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

##### Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

##### Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

##### Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

##### Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

##### Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease or emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer; (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

##### Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

##### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

##### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # 79907

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

**US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.**

**If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:**

Waste Common Name: PICKLE LIQUOR

#### Section 1 - Generator & Customer Information

Generator EPA ID # FLD-981-932-494

Generator EQ FLORIDA, INC.

Facility Address 2002 N. ORIENT ROAD

City TAMPA State FL Zip 33619

24-hour Emergency Response Number (813) 319-3402

Mailing Address 7202 EAST 8TH AVENUE

City TAMPA State FL Zip 33619

Generator Contact \_\_\_\_\_

Title \_\_\_\_\_

Phone ( ) - \_\_\_\_\_ Fax ( ) - \_\_\_\_\_

E-mail \_\_\_\_\_

Internal Use Only: EQ Division \_\_\_\_\_

EQ Customer No. 6696

Invoicing Company EQ FLORIDA INC

Address 7202 EAST 8TH AVENUE

City TAMPA State FL Zip 33619

Country USA

Invoicing Contact \_\_\_\_\_

Phone ( ) - \_\_\_\_\_ Fax ( ) - \_\_\_\_\_

Technical Contact \_\_\_\_\_

Phone ( ) - \_\_\_\_\_ Fax ( ) - \_\_\_\_\_

Cell Phone ( ) - \_\_\_\_\_

E-mail \_\_\_\_\_

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: 30-40 55 gallon

b) Frequency: ☐ One Time ☐ Month ☒ Quarter ☐ Year ☐ Other \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:

RQ, UN3264, Waste, Corrosive liquid, acidic, inorganic, n.o.s.(Hydrofluoric Acid, Nitric Acid), 8, PGII, (K062, D002), ERG #154

#### Section 3 - Special Properties

3.1) Color BLACK/BROWN

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia

☒ Other: ACRID/MOD.

3.3) Consistency at 70 °F: ☒ Solid ☐ Dust/Powder ☐ Debris ☒ Sludge ☐ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☒ ≤2 ☒ 2.1-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☒ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos - non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

Pickle Liquor \_\_\_\_\_ 100. to \_\_\_\_\_ 100. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

Spent Pickle Liquor from pickling of stainless steel. Meets the definition of K062.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☐ No

\*If yes, describe: \_\_\_\_\_

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption: \_\_\_\_\_

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☒ Yes ☐ No K062

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☐ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002 D007 D008

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No

**If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.**

5.5) EPA Source Code: G25 EPA Form Code: W316

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS

*Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.*

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☐ No

c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☐ No  
(Debris is greater than 2.5 inches in size.)

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight: \_\_\_\_\_

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☐ Yes\* ☐ No

\*If Yes, please list: \_\_\_\_\_

*For a complete list of UHC constituents, please refer to 40 CFR 268.48*

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☐ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG) ? ☐ UNIV ☐ RG ☐ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☐ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_

☐ Other, describe: \_\_\_\_\_

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☐ No
- \*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No
- If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No
- If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
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Generator Signature \_\_\_\_\_ Printed Name \_\_\_\_\_

Company \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_



## STANDARD TERMS AND CONDITIONS

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For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

### Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

### Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

### Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

### Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

### Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

### Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

### Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # 194178

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

**US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.**

**If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:**

**Waste Common Name:** GENERIC ACID: MINERAL ACIDS>30% CONCENTRATION

#### Section 1 - Generator & Customer Information

<b>Generator EPA ID #</b> <u>FLD-981-932-494</u>	<i>Internal Use Only: EQ Division</i> _____
<b>Generator</b> <u>EQ FLORIDA, INC.</u>	<b>EQ Customer No.</b> <u>6696</u>
<b>Facility Address</b> <u>2002 N. ORIENT ROAD</u>	<b>Invoicing Company</b> <u>EQ FLORIDA INC</u>
<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>	<b>Address</b> <u>7202 EAST 8TH AVENUE</u>
<b>24-hour Emergency Response Number</b> <u>(813) 319-3402</u>	<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>
	<b>Country</b> <u>USA</u>
<b>Mailing Address</b> <u>7202 EAST 8TH AVENUE</u>	<b>Invoicing Contact</b> <u>DENA EVERHARDT</u>
<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>	<b>Phone</b> <u>(813) 623-5302xt227</u> <b>Fax</b> <u>(813) 626-7451</u>
<b>Generator Contact</b> <u>Ken Dean</u>	<b>Technical Contact</b> <u>Ken Dean</u>
<b>Title</b> <u>Operations Manager</u>	<b>Phone</b> <u>(813) 319-3433</u> <b>Fax</b> <u>(813) 622-8765</u>
<b>Phone</b> <u>(813) 319-3433</u> <b>Fax</b> <u>(813) 622-8765</u>	<b>Cell Phone</b> <u>( ) -</u>
<b>E-mail</b> <u>Ken.Dean@usecology.com</u>	<b>E-mail</b> <u>Ken.Dean@usecology.com</u>

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: 10-12 , Other: Varies

b) Frequency: ☐ One Time ☒ Month ☐ Quarter ☐ Year ☐ Other \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:  
UN3264, Waste, Corrosive liquid, acidic, inorganic, n.o.s., 8, PGII, ERG #154

#### Section 3 - Special Properties

3.1) Color VARIES

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia  
☒ Other: Mild

3.3) Consistency at 70 °F: ☒ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☒ ≤2 ☒ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos - non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

SOLUTIONS OF INORGANIC MINERAL ACIDS	100. to	100. %
HYDROCHLORIC ACID SOLUTION	0. to	100. %
PHOSPHORIC ACID SOLUTION	0. to	100. %
SULFURIC ACID SOLUTION	0. to	100. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

NO FUMING ACIDS. NO CHROMIC, NITRIC, OR HYDROFLUORIC ACIDS. Acid concentration greater than 30% combined. Accumulation of non-listed mineral acids by TSDF. Waste may include expired products or spent solutions. <5000ppm Total RCRA/UHC Metals, <2000 ppm Cr, <500 ppm Cd, <150 ppm As, <260 ppm Hg total, <150 ppm Se, <150 ppm Sb, <10 mg/L Hg TCLP. No organic codes/UHCs. No free mercury. No Michigan codes. Combinations with other acid types must be profiled separately.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☒ No

\*If yes, describe: \_\_\_\_\_

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption: \_\_\_\_\_

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☒ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002 D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: G61 EPA Form Code: W103

5.6) Waste Code Determination Is Based On: ☐ Generator Knowledge ☐ Analysis ☐ MSDS

Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No  
(Debris is greater than 2.5 inches in size.)

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight: \_\_\_\_\_

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☒ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 212 Nickel, 214 Silver, 216 Thallium

For a complete list of UHC constituents, please refer to 40 CFR 268.48

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_

☐ Other, describe: \_\_\_\_\_

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☒ No  
\*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_,  
required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No
- If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No
- If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
- Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name Kenneth S. Dean

Company EQ Florida, Inc. Title Operations Manager Date \_\_\_\_\_



## STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

### Definitions

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

### Control of Operations

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

### Identification of Waste

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

### Non-Conforming Wastes

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

### Customer Warranty - Acceptable Wastes

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

### Customer Warranty - Title to Wastes

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

### Customer Warranty - Compliance with Laws

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

### Customer Warranty - Updating Information

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

### Customer Indemnity

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

### Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # 188445

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.

If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:

Waste Common Name: Mixed Dilute Acids <30% with Metals.

#### Section 1 - Generator & Customer Information

Generator EPA ID # <u>FLD-981-932-494</u>	Internal Use Only: EQ Division _____
Generator <u>EQ FLORIDA, INC.</u>	EQ Customer No. <u>6696</u>
Facility Address <u>2002 N. ORIENT ROAD</u>	Invoicing Company <u>EQ FLORIDA INC</u>
City <u>TAMPA</u> State <u>FL</u> Zip <u>33619</u>	Address <u>7202 EAST 8TH AVENUE</u>
24-hour Emergency Response Number <u>(813) 319-3402</u>	City <u>TAMPA</u> State <u>FL</u> Zip <u>33619</u>
	Country <u>USA</u>
Mailing Address <u>7202 EAST 8TH AVENUE</u>	Invoicing Contact <u>DENA EVERHARDT</u>
City <u>TAMPA</u> State <u>FL</u> Zip <u>33619</u>	Phone <u>(813) 623-5302xt227</u> Fax <u>(813) 626-7451</u>
Generator Contact <u>Ken Dean</u>	Technical Contact <u>Ken Dean</u>
Title <u>Operations Manager</u>	Phone <u>(813) 319-3433</u> Fax <u>(813) 622-8765</u>
Phone <u>(813) 319-3433</u> Fax <u>(813) 622-8765</u>	Cell Phone <u>( ) -</u>
E-mail <u>Ken.Dean@usecology.com</u>	E-mail <u>Ken.Dean@usecology.com</u>

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: Varies

b) Frequency: ☐ One Time ☒ Month ☐ Quarter ☐ Year ☐ Other \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:  
RQ, UN3264, Waste, Corrosive liquid, acidic, inorganic, n.o.s., 8, PGI, (D002), ERG #154

#### Section 3 - Special Properties

3.1) Color VARIES

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia  
☒ Other: Mild

3.3) Consistency at 70 °F: ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☐ Liquid ☐ Gas/Aerosol ☒ Varies

3.4) What is the pH? ☒ ≤2 ☒ 2.1-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos - non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

<30% SOLUTION OF INORGANIC MINERAL ACID	100. to	100. %
<30% SOLUTION OF HYDROCHLORIC ACID	0. to	100. %
<30% SOLUTION OF PHOSPHORIC ACID	0. to	100. %
<30% SOLUTION OF SULFURIC ACID	0. to	100. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

NO FUMING ACIDS. NO CHROMIC, NITRIC, OR HYDROFLUORIC ACIDS. Acid concentration less than 30% combined. Accumulation of non-listed mineral acids by TSDF. Waste may include expired products or spent solutions. <5000ppm Total RCRA/UHC Metals, <2000 ppm Cr, <500 ppm Cd, <150 ppm As, <260 ppm Hg total, <150 ppm Se, <150 ppm Sb, <10 mg/L Hg TCLP. No organic codes/UHCs. No free mercury. No Michigan codes. Combinations with other acid types must be profiled separately.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☒ No

\*If yes, describe: \_\_\_\_\_

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption: \_\_\_\_\_

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☒ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002 D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No 0003110H 0003110H 0004105H 0005319H

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: G61 EPA Form Code: W103

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS

Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No  
(Debris is greater than 2.5 inches in size.)

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight: \_\_\_\_\_

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☒ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 203 Beryllium, 209 Lead, 211 Mercury (all others), 212 Nickel, 214 Silver, 216 Thallium

For a complete list of UHC constituents, please refer to 40 CFR 268.48

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

- ☐ This is a metalworking oil/fluid containing chlorinated paraffins.  
☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.  
☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_  
☐ Other, describe: \_\_\_\_\_

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☐ No  
\*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No
- If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No
- If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
- Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name Kenneth S. Dean

Company EQ Florida, Inc. Title Operations Manager Date \_\_\_\_\_



#### STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

#### Definitions

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

#### Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

#### Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

#### Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

#### Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

#### Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

#### Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

#### Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

#### Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

#### Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

#### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

#### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # 345947

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

**US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.**

**If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:**

**Waste Common Name:** GENERIC ACID : NITRIC ACID (10-65%)

#### Section 1 - Generator & Customer Information

<b>Generator EPA ID #</b> <u>FLD-981-932-494</u>	<i>Internal Use Only: EQ Division</i> <u>EQ Customer No. 6696</u>
<b>Generator</b> <u>EQ FLORIDA, INC.</u>	<b>Invoicing Company</b> <u>EQ FLORIDA INC</u>
<b>Facility Address</b> <u>2002 N. ORIENT ROAD</u>	<b>Address</b> <u>7202 EAST 8TH AVENUE</u>
<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>	<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>
<b>24-hour Emergency Response Number</b> <u>(813) 319-3402</u>	<b>Country</b> <u>USA</u>
<b>Mailing Address</b> <u>7202 EAST 8TH AVENUE</u>	<b>Invoicing Contact</b> <u>DENA EVERHARDT</u>
<b>City</b> <u>TAMPA</u> <b>State</b> <u>FL</u> <b>Zip</b> <u>33619</u>	<b>Phone</b> <u>(813) 623-5302xt227</u> <b>Fax</b> <u>(813) 626-7451</u>
<b>Generator Contact</b> <u>Ken Dean</u>	<b>Technical Contact</b> <u>Ken Dean</u>
<b>Title</b> <u>Operations Manager</u>	<b>Phone</b> <u>(813) 319-3433</u> <b>Fax</b> <u>(813) 622-8765</u>
<b>Phone</b> <u>(813) 319-3433</u> <b>Fax</b> <u>(813) 622-8765</u>	<b>Cell Phone</b> <u>( ) -</u>
<b>E-mail</b> <u>Ken.Dean@usecology.com</u>	<b>E-mail</b> <u>Ken.Dean@usecology.com</u>

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: Varies

b) Frequency: ☐ One Time ☐ Month ☐ Quarter ☒ Year ☐ Other \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:  
UN3264, Waste, Corrosive liquid, acidic, inorganic, n.o.s., 8, PGII, ERG #154

#### Section 3 - Special Properties

3.1) Color VARIES

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia  
☒ Other: NONE TO MILD

3.3) Consistency at 70 °F: ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☒ ≤2 ☒ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos -non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

Solution of Nitric Acid	10. to	65. %
Water	35. to	90. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

NO FUMING ACIDS. Acid concentration must be <70%. An accumulation of nitric acid solutions collected at a TSDF. Waste may include expired products and spent solutions. No listed waste is included. <5000 ppm total RCRA/UHC metals. <2000 mg/kg chromium, <500 ppm cadmium, <150 ppm arsenic, <260 ppm total mercury, <10 ppm TCLP mercury, <150 ppm selenium, <150 ppm antimony. No free mercury. Combinations with other acid types must be profiled separately.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☐ No

\*If yes, describe: \_\_\_\_\_

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption: \_\_\_\_\_

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☐ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☐ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002 D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No

*If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.*

5.5) EPA Source Code: G61 EPA Form Code: W103

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS

*Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.*

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☐ No

c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☐ No  
(Debris is greater than 2.5 inches in size.)

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight: \_\_\_\_\_

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☐ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 212 Nickel, 214 Silver, 216 Thallium

*For a complete list of UHC constituents, please refer to 40 CFR 268.48*

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☐ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☐ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☐ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_

☐ Other, describe: \_\_\_\_\_

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☐ No
- \*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No
- If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No
- If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
- Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name \_\_\_\_\_

Company \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_



#### STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

##### Definitions

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

##### Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

##### Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

##### Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

##### Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

##### Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

##### Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

##### Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

##### Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

##### Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

##### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

##### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # **196479**

### WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at [www.usecology.com](http://www.usecology.com) or call 800-592-5489.

US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.

If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:

Waste Common Name: GENERIC ACID: NITRIC ACID<30% CONCENTRATION

#### Section 1 - Generator & Customer Information

Generator EPA ID # <b>FLD-981-932-494</b>	Internal Use Only: EQ Division
Generator <b>EQ FLORIDA, INC.</b>	EQ Customer No. <b>6696</b>
Facility Address <b>2002 N. ORIENT ROAD</b>	Invoicing Company <b>EQ FLORIDA INC</b>
City <b>TAMPA</b> State <b>FL</b> Zip <b>33619</b>	Address <b>7202 EAST 8TH AVENUE</b>
24-hour Emergency Response Number <b>(813) 319-3402</b>	City <b>TAMPA</b> State <b>FL</b> Zip <b>33619</b>
	Country <b>USA</b>
Mailing Address <b>7202 EAST 8TH AVENUE</b>	Invoicing Contact <b>DENA EVERHARDT</b>
City <b>TAMPA</b> State <b>FL</b> Zip <b>33619</b>	Phone <b>(813) 623-5302xt227</b> Fax <b>(813) 626-7451</b>
Generator Contact <b>Ken Dean</b>	Technical Contact <b>Ken Dean</b>
Title <b>Operations Manager</b>	Phone <b>(813) 319-3433</b> Fax <b>(813) 622-8765</b>
Phone <b>(813) 319-3433</b> Fax <b>(813) 622-8765</b>	Cell Phone <b>( ) -</b>
E-mail <b>Ken.Dean@usecology.com</b>	E-mail <b>Ken.Dean@usecology.com</b>

#### Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: **Varies**

b) Frequency: ☐ One Time ☒ Month ☐ Quarter ☐ Year ☐ Other

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:  
**RQ, UN2031, Waste, Nitric acid mixtures, 8, PGII, (D002), ERG #154**

#### Section 3 - Special Properties

3.1) Color **VARIES**

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia  
☒ Other: **Mild**

3.3) Consistency at 70 °F: ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☒ ≤2 ☒ 2.1-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos -non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

SOLUTIONS OF NITRIC ACID	0. to	20. %
WATER	80. to	100. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

NO FUMING ACIDS. Acid concentration must be <30%. An accumulation of nitric acid solutions collected at a TSDF. Waste may include expired products and spent solutions. No listed waste is included. <5000 ppm total RCRA/UHC metals. <2000 mg/kg chromium, <500 ppm cadmium, <150 ppm arsenic, <260 ppm total mercury, <10 ppm TCLP mercury, <150 ppm selenium, <150 ppm antimony. No free mercury. Combinations with other acid types must be profiled separately.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☒ No

\*If yes, describe: \_\_\_\_\_

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA? ☐ Yes ☒ No

If Yes, please provide exemption: \_\_\_\_\_

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☒ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes ☐ No D002 D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes ☐ No

*If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.*

5.5) EPA Source Code: G61 EPA Form Code: W103

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS

*Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.*

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No  
(Debris is greater than 2.5 inches in size.)

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight: \_\_\_\_\_

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☒ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 212 Nickel, 213 Selenium, 214 Silver, 216 Thallium

*For a complete list of UHC constituents, please refer to 40 CFR 268.48*

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_

☐ Other, describe: \_\_\_\_\_

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☐ No
- \*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No
- If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No
- If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
- Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

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I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name Kenneth S. Dean

Company EQ Florida, Inc. Title Operations Manager Date \_\_\_\_\_



#### STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

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The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

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If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:

**Waste Common Name:** GENERIC ACID: ORGANIC ACID SOLUTIONS

Generator EPA ID # <u>FLD-981-932-494</u>	Internal Use Only: EQ Division
Generator <u>EQ FLORIDA, INC.</u>	EQ Customer No. <u>6696</u>
Facility Address <u>2002 N. ORIENT ROAD</u>	Invoicing Company <u>EQ FLORIDA INC</u>
City <u>TAMPA</u> State <u>FL</u> Zip <u>33619</u>	Address <u>7202 EAST 8TH AVENUE</u>
24-hour Emergency Response Number <u>(813) 319-3402</u>	City <u>TAMPA</u> State <u>FL</u> Zip <u>33619</u>
Mailing Address <u>7202 EAST 8TH AVENUE</u>	Country <u>USA</u>
City <u>TAMPA</u> State <u>FL</u> Zip <u>33619</u>	Invoicing Contact <u>DENA EVERHARDT</u>
Generator Contact <u>Ken Dean</u>	Phone <u>(813) 623-5302xt227</u> Fax <u>(813) 626-7451</u>
Title <u>Operations Manager</u>	Technical Contact <u>Ken Dean</u>
Phone <u>(813) 319-3433</u> Fax <u>(813) 622-8765</u>	Phone <u>(813) 319-3433</u> Fax <u>(813) 622-8765</u>
E-mail <u>Ken.Dean@usecology.com</u>	Cell Phone <u>( ) -</u>
	E-mail <u>Ken.Dean@usecology.com</u>

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: Varies

b) Frequency: ☐ One Time ☐ Month ☐ Quarter ☒ Year ☐ Other \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49 CFR 172.101 Hazardous Materials Table:  
UN3265, Waste, Corrosive liquid, acidic, organic, n.o.s., 8, PGII, ERG #153

3.1) Color VARIES

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia  
☒ Other: Mild

3.3) Consistency at 70 °F: ☒ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☒ ≤2 ☒ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90 °F ☐ 90-139 °F ☐ 140-199 °F ☒ ≥200 °F ☐ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

<input type="checkbox"/> None	<input checked="" type="checkbox"/> Free Liquids	<input type="checkbox"/> Metal Fines	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Biohazard
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Oily Residue	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Furans	<input type="checkbox"/> Aluminum
<input type="checkbox"/> Asbestos -non- friable	<input type="checkbox"/> Asbestos - friable	<input type="checkbox"/> Other Radioactive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Isocyanates
<input type="checkbox"/> Biodegradable Sorbents	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Reactive Sulfide	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Explosives
<input type="checkbox"/> Temperature Controlled Organic Peroxide	<input type="checkbox"/> NORM	<input type="checkbox"/> TENORM		

### Section 4 - Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges or the concentration of each component, either estimated or known.

Solutions of Organic Acids	0. to	100. %
Water	0. to	100. %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

NO ACETIC ACID NOR FORMIC ACID. ACID LIST AND CONCENTRATIONS MUST BE SENT UPON SCHEDULING. No listed wastes. Accumulation of organic acids by TSDF. Waste may include expired products or spent solutions (eg lactic acid, glycolic acid). <5000ppm Total RCRA/UHC Metals, <2000 ppm Cr, <500 ppm Cd, <150 ppm As, <260 ppm Hg total, <150 ppm Se, <150 ppm Sb, <10 mg/L Hg TCLP. No organic codes/UHCs. No free mercury. No MI codes. Combinations with other acid types must be profiled separately.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☐ No

\*If yes, describe: \_\_\_\_\_

### Section 5 - Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

5.1) Is this waste exempted from RCRA?

☐ Yes ☒ No

If Yes, please provide exemption: \_\_\_\_\_

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)?

☐ Yes ☐ No

a) For F006-F009, F012, does this come from a generator that conducts a cyanide plating process?

☐ Yes ☐ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)?

☒ Yes ☐ No

D002 D004 D005 D006 D007 D008 D009 D010 D011

5.4) Do any State Specific Hazardous Waste Codes apply?

☐ Yes ☐ No

**If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.**

5.5) EPA Source Code: G61

EPA Form Code: W103

5.6) Waste Code Determination Is Based On: ☐ Generator Knowledge ☐ Analysis ☐ MSDS

*Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.*

5.7) Does this waste exceed Land Disposal Restriction levels?

☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)?

☐ WW ☒ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49?

☐ Yes ☐ No

c) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.)

☐ Yes ☐ No

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight:

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents?

☐ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 212 Nickel, 213 Selenium, 214 Silver, 216 Thallium, 217 Vanadium, 219 Copper

*For a complete list of UHC constituents, please refer to 40 CFR 268.48*

### Section 6 - Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply?

☐ Yes ☐ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG) ?

☐ UNIV ☐ RG ☐ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279?

☐ Yes ☐ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm?

☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

☐ This is a metalworking oil/fluid containing chlorinated paraffins.

☐ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_

☐ Other, describe: \_\_\_\_\_

### Section 7 - TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown
- If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.**
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☐ No  
\*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ Yes ☐ No ☒ N/A

### Section 8 - Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No
- \*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.
- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
- If you answered "no" to 8.4, please proceed to Section 9.**
- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)? ☐ Yes ☐ No
- If Yes, please provide the SIC/NAICS code: \_\_\_\_\_
- If you answered "no" to 8.5, please proceed to Section 9.**
- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site? ☐ Yes ☐ No
- If Yes, please specify: \_\_\_\_\_
- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No
- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No
- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ 0 Mg/year
- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.
- Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

**If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.**

Generator Signature \_\_\_\_\_ Printed Name \_\_\_\_\_

Company \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_



## STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

### Definitions

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

### Control of Operations

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

### Identification of Waste

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

### Non-Conforming Wastes

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

### Customer Warranty - Acceptable Wastes

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

### Customer Warranty - Title to Wastes

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

### Customer Warranty - Compliance with Laws

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

### Customer Warranty - Updating Information

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

### Customer Indemnity

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

### Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.



Profile Tracking # \_\_\_\_\_

## WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings,  
please visit our website at [www.usecology.com](http://www.usecology.com), or call 800-592-5489.

US Ecology will choose the appropriate facility and method of waste management  
for your waste from the technologies offered at each operation.

If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:

Waste Common Name: ORGANIC ALKALINE

### Section 1 – Generator & Customer Information

Generator EPA ID # \_\_\_\_\_

NAICS/SIC Code \_\_\_\_\_

Generator \_\_\_\_\_

Facility Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

24-hour Emergency Response Number \_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Generator Contact \_\_\_\_\_

Title \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_

E-mail \_\_\_\_\_

Internal Use Only: EQ Division \_\_\_\_\_

EQ Customer No. \_\_\_\_\_

Invoicing Company \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Country \_\_\_\_\_

Invoicing Contact \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_

Technical Contact \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_

Cell Phone \_\_\_\_\_

E-mail \_\_\_\_\_

### Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: Varies

b) Frequency: ☐ One time ☐ Month ☒ Year ☐ Other: \_\_\_\_\_

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49CFR 172.101 Hazardous Materials Table:

Varies

### Section 3 – Special Properties

3.1) Color Varies

3.2) Odor ☒ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☒ Amines/Ammonia

☒ Other: Mild

3.3) Consistency at 70°F: ☐ Solid ☐ Dust/Powder ☐ Debris ☒ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☐ ≤2 ☐ 2.1-4.9 ☒ 5 – 10 ☒ 10.1 – 12.4 ☒ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90°F ☐ 90-139°F ☐ 140-199°F ☐ >200°F ☒ N/A

3.6) Does this waste exhibit any of the following properties? (check all that apply)

- |  |  |  |   |                                      |
|--|--|--|---|--------------------------------------|
| <input type="checkbox"/> None                                    | <input checked="" type="checkbox"/> Free Liquids | <input type="checkbox"/> Metal Fines       | <input type="checkbox"/> Water Reactive   | <input type="checkbox"/> Biohazard   |
| <input type="checkbox"/> Shock Sensitive                         | <input type="checkbox"/> Oily Residue            | <input type="checkbox"/> Dioxins           | <input type="checkbox"/> Furans           | <input type="checkbox"/> Aluminum    |
| <input type="checkbox"/> Asbestos – non-friable                  | <input type="checkbox"/> Asbestos – friable      | <input type="checkbox"/> Other Radioactive | <input type="checkbox"/> Air Reactive     | <input type="checkbox"/> Isocyanates |
| <input type="checkbox"/> Biodegradable Sorbents                  | <input type="checkbox"/> Pyrophoric              | <input type="checkbox"/> Reactive Sulfide  | <input type="checkbox"/> Reactive Cyanide | <input type="checkbox"/> Explosives  |
| <input type="checkbox"/> Temperature Controlled Organic Peroxide | <input type="checkbox"/> NORM                    | <input type="checkbox"/> TENORM            |   |                                      |

#### Section 4 – Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges of the material, either estimated or known.

Organic Alkaline Waste \_\_\_\_\_ 100 \_\_\_\_\_ to 100 \_\_\_\_\_ % \_\_\_\_\_ to \_\_\_\_\_ %  
(typically surfactants/amines) \_\_\_\_\_ to \_\_\_\_\_ % \_\_\_\_\_ to \_\_\_\_\_ %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

Accumulation of organic alkaline materials through a TSDF. NO BULK w/o a sample for review. Amine/ammonia concentration must be <5% - must be technically approved prior to shipment. No flammable mat'l. No metal powders/fines - no Be/Al/Zn/Mg dusts/fines/pieces. <5000 ppm Total RCRA/UHC metals. <2000 mg/kg Cr, <500 mg/kg Cd, <150 mg/kg As, <260 mg/kg Hg total, <10 mg/L Hg TCLP, <150 mg/kg Se, <150 mg/kg Sb. No free mercury. Typical alkalines would include surfactants / amines.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes\* ☒ No  
\*If yes, describe: \_\_\_\_\_

#### Section 5 – Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules:

Please list applicable waste code(s):

- 5.1) Is this waste exempted from RCRA? ☐ Yes, please provide exemption: \_\_\_\_\_ ☒ No
- 5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes: \_\_\_\_\_ ☒ No  
a) For F006–F009, F012, does this come from a generator that conducts a cyanide plating process? ☐ Yes ☒ No
- 5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes: \_\_\_\_\_ D002, D004-D011 ☐ No
- 5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes: \_\_\_\_\_ ☒ No

*If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.*

5.5) EPA Source Code: G025 EPA Form Code: W219

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS  
*Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.*

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

- a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW
- b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40CFR 268.49? ☐ Yes ☒ No
- c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No  
(Debris is greater than 2.5 inches in size.)
- d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight: \_\_\_\_\_

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☐ Yes\* ☐ No

\*If Yes, please list: 200 Antimony, 201 Arsenic, 202 Barium, 203 Beryllium, 204 Cadmium, 205 Chromium, 209 Lead, 211 Mercury (all others), 212 Nickel, 213 Selenium, 214 Silver, 216 Thallium, 217 Vanadium, 219 Copper  
*For a complete list of UHC constituents, please refer to 40 CFR 268.48*

### Section 6 – Non-Hazardous Wastes

Please list applicable waste code(s):

- 6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No
- 6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A
- 6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No
- a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No
- b) If yes, what is the source of the halogen content?
- ☐ This is a metalworking oil/fluid containing chlorinated paraffins.
- ☐ This is used oil contaminated with chlorofluorocarbons from refrigeration units.
- ☐ This oil contains halogenated solvents. List specific solvents: \_\_\_\_\_
- ☐ Other, describe: \_\_\_\_\_

### Section 7 – TSCA Information

- 7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
- 7.2) Does the waste contain PCB contamination from a source with a concentration  $\geq 50$  ppm? ☐ Yes ☒ No ☐ Unknown  
*If you answered "none" or "0-49 ppm" to 7.1 and "no" to 7.2, please proceed to Section 8.*
- 7.3) Has this waste been processed into a non-liquid form? ☐ Yes\* ☒ No
- \*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
- 7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
- 7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
- 7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

### Section 8 – Clean Air Act Information

- 8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
- 8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
- 8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes\* ☒ No

\*If Yes this document serves as notification that this waste contains chemicals \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_ required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart \_\_\_\_\_ of NESHAP/MACT standards.

- 8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No

*If you answered "no" to 8.4, please proceed to Section 9.*

- 8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)?

☐ Yes, please provide the SIC/NAICS code: \_\_\_\_\_ ☐ No

*If you answered "no" to questions 8.5, please proceed to Section 9.*

- 8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site?

☐ Yes, please specify: \_\_\_\_\_ ☐ No

- 8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB)  $\geq 10$  Mg/year? ☐ Yes ☐ No

- 8.8) Does the waste contain >10% water? ☐ Yes ☐ No

- 8.9) What is the TAB quantity for your facility? \_\_\_\_\_ Mg/Year

- 8.10) What is the total Benzene concentration in your waste? \_\_\_\_\_ Percent or \_\_\_\_\_ ppmw.

**Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.**

### Section 9 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

***If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.***

Generator Signature \_\_\_\_\_ Printed Name \_\_\_\_\_

Company \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_



#### STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ – The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste. The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

##### Definitions

The following definitions shall apply for purposes of this Agreement:

**"Acceptable Waste"** shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

**"Delivered Wastes"** shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

**"Non-Conforming Wastes"** shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

##### Control of Operations

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

##### Identification of Waste

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

##### Non-Conforming Wastes

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

##### Customer Warranty - Acceptable Wastes

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

##### Customer Warranty - Title to Wastes

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

##### Customer Warranty - Compliance with Laws

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

##### Customer Warranty - Updating Information

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

##### Customer Indemnity

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

##### Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

##### Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

##### Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

## **APPENDIX L**

### ***Proof of Publication of Notice***

***Pursuant to 62-730.292(6), F.A.C., proof of publication and broadcast required under this permit application will be provided to the Department no later than 45 days after receipt of the Department's intended action.***

## **APPENDIX M**

### ***Preparedness and Prevention Plan and Hazardous Waste Contingency/Emergency Response Plan***



# **Preparedness and Prevention Plan and Hazardous Waste Contingency/Emergency Response Plan**

**EQ Florida, Inc.**

**7202 East 8<sup>th</sup> Avenue  
Tampa, FL 33619**

***Permit No.: 34875-HO-011***

**Revision: 01  
May 13, 2016**

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### **APPENDICES**

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Appendix C.	EQ Supplemental Emergency and Safety Equipment

## **1.0 FACILITY PREPAREDNESS AND PREVENTION**

EQ has an Emergency Action Plan (Appendix A) as well as this PPP/CP. As requested by FDEP, the Hurricane Response information provided on the EPA Region 4 website is contained in Appendix B. The PPP and CP for EQ will be updated annually and are described in the sections below.

All EQ employees have reviewed and are familiar with the EQ Contingency Plan. "Hands on" operations personnel involved in hazardous waste handling, transportation, emergency response, storage, or treatment have successfully completed a program of classroom instruction or on-the-job training that teaches Contingency Plan implementation. The course outline for the EQ Contingency Plan training is included in the Training Program (described in Section 6.0 of Volume 1 of 3). The Contingency Plan training includes an on-site emergency response drill and post-drill evaluation.

As described in Section 5.0 of Volume 1 of 3, the EQ facility is regularly inspected for malfunctions and deterioration, operator errors, and discharges, which may cause (or lead to) release of hazardous waste constituents to the environment or a threat to human health. These inspections are intended to identify problems in time to correct them before a release of hazardous waste or constituents occur. A facility inspection log is maintained to document the results of these inspections.

All monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment, including the on ground treatment/solidification tank, that are important to preventing, detecting, or responding to human health or environmental hazards will be inspected daily (each operating day). The inspections will be performed by trained EQ operations personnel. All inspections will be reviewed and approved by a senior EQ employee (manager, supervisor, or chemist).

The inspector will look for the items listed on the EQ Facility Inspection Log. All areas subject to spills, such as the loading/unloading, container storage areas, and the hazardous waste treatment tank are inspected daily (each operating day). All containers are inspected for container condition, closure, labeling, and aisle space. Housekeeping and proper storage are also inspected daily. The vehicle loading and unloading areas and transfer facility vehicles and wastes are inspected daily to identify problems. External areas such as the area for storage of empty containers and the stormwater systems (trenches, filter, and retention pond) are inspected daily to identify problems. Safety and emergency equipment is inspected daily for condition, availability, and operations capability. The safety and emergency equipment inspected includes fire control equipment, communication devices, safety showers and eye washes, spill kits, exits, safety supply lockers, fire suppression and alarm systems, and LEL meter and sensors. The contents of the safety supply lockers will be inspected and inventoried monthly. The date of inspection and inventory will also be noted on the Facility Inspection Log. The contents of the safety supply lockers are to be used only in the event of an emergency. The date of re-inspection and re-inventory will be noted on the Facility Inspection Log. The waste inventory for the Container Storage Building (CSB), Waste Processing Building (WPB), Improved Secondary Containment (ISC), Inbound/Outbound Storage Area (I/O), 10-Day Transfer Area, and Bulk Container Storage Area (BSCA) is noted daily on the inspection log.

Every unsatisfactory condition noted during the inspection will be immediately corrected if possible. Items not immediately corrected will be noted on the inspection log. Unsatisfactory conditions noted on the inspection log will be corrected within fourteen (14) days. EQ will submit a written schedule to correct the deficiency to the FDEP should any deficiency not be corrected within fourteen (14) days. Where a hazard is imminent or has already occurred, remedial action will be taken immediately. The EQ Contingency Plan will be implemented if a fire, explosion, or unplanned release of hazardous waste or hazardous waste constituents occurs to the air, soil, groundwater, or surface water, which could threaten human health or the environment. All remedial actions completed will be noted on the inspection log.

Further, as discussed in Section 3.4 of Volume 1 of 3 (Ignitable, Reactive, or Incompatible Wastes), EQ has taken all precautions to prevent reactions which may:

1. Generate extreme heat, pressure, fire, explosion, or violent reaction.
2. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantity to threaten human health or the environment.
3. Produce uncontrolled flammable fumes or gases in sufficient quantities to threaten human health or the environment.
4. Damage the structural integrity of the device or facility.
5. Through other similar means which threaten human health or the environment

## **1.1 Design and Operation of Facility**

EQ Florida, Inc. (EQ) operates a hazardous waste storage, treatment, and transfer facility (Attachment 1) at:

7202 East 8<sup>th</sup> Avenue  
Tampa, Florida 33619  
FLD 981 932 494

The EQ facility was specially designed and built for hazardous waste storage, transfer, and treatment. The facility consists of a 4.46 acre MOL site with a loading/unloading area, office building, 5,866 square foot MOL Container Storage Building (CSB), a 1,786 square foot MOL Improved Secondary Containment Area (ICSA) and an 8,050 square foot covered Waste Processing Building (WPB) that houses the solid waste solidification tank; shredder; on-ground hazardous waste treatment/solidification tank, and a reactivities magazine. The Facility boundary survey and proposed layout plan is provided as Attachment 1.

The office building does not conduct commercial hazardous waste storage, transfer, or treatment. The EQ quality control laboratory is located in the office building. The lab generates small quantities (5 gallons or less) of satellite accumulation wastes, which are taken to the hazardous waste storage building for storage prior to shipment to an off-site permitted disposal facility.

The loading/unloading area is used for the loading and unloading of hazardous waste. Transport vehicles delivering shipments of hazardous waste back into any one of seven available loading/unloading docks. The docks have roll-up doors, which allow unloading directly from transport vehicle to the CSB. Outbound waste shipments are loaded in a similar manner. The loading and unloading areas are shown on Attachment 2.

The waste is loaded directly from the CSB to the transport vehicle. The loading/unloading area is an impervious contained surface constructed of concrete and asphalt. An epoxy coating covers the 10,000-gallon Improved Secondary Containment Area (ISCA) in front of Bay 2. There is a 60-foot roof overhang from the Container Storage Building over the loading/unloading area. All stormwater run-off from the loading/unloading area can be contained and inspected prior to release to the stormwater management system. Surface water flow and the stormwater management system are shown on Attachment 3.

The CSB was designed and built specifically for hazardous waste storage, transfer, and treatment. The building is 5,866 square feet (MOL) and features a floor that is five inches of 4,000 psi concrete placed monolithically and coated with a chemical resistant sealant and two layers of chemical resistant polyurethane coating. The CSB consists of three separate bays. An eight-inch wide concrete block wall separates each bay. The walls extend from the floor to the roof and are designed with a minimum fire

resistance of four hours. Storage Bays 1 and 3 are at opposite ends of the building and have identical dimensions of approximately 48- ft. by 50-ft.

Storage Bay 2 is in the center of the building approximately half the size of Bays 1 and 3. The dimensions of Bay 2 are approximately 22-ft. by 50-ft. The CSB has five separate containment sumps with a capacity of 1,001 gallons each. This provides a total of 5,005 gallons of containment sump capacity. The floors of each bay are sloped 1/8 inch per foot to each containment sump. The 1/8 inch per foot slope of the floors provides additional containment beyond the 1,001 gallons of each containment sump. Conservatively, the additional containment available from the floor slope has not been included in containment calculations. Each containment sump is available to contain spills or leaks of different hazard class materials. This eliminates the potential for incompatible materials to spill or leak into the same containment sump. The sloping of the floors directs potential spills or leaks to the appropriate containment sump. Two sumps each are in Bays 1 and 3 and one sump is in Bay 2. The CSB is shown on Attachment 4.

The 8,050 square foot covered Waste Processing Building contains the solid waste solidification tank; shredder; on-ground hazardous waste treatment tank, reactivities magazine, and the proposed container storage (Attachment 5). The hazardous waste treatment tank treats characteristically hazardous waste codes D002 (corrosivity); D004 (arsenic); D005 (barium); D006 (cadmium); D007 (chromium); D008 (lead); D009 (mercury); D010 (selenium); and D011 (silver) and proposed listed waste code K062 ('spent pickle liquor' from steel finishing operations).

The reactivities magazine is housed in the covered WPB, in the west central part of the structure. The location of the magazine is shown on Attachment 5 and the specifications are provided in Appendix I.

## **1.2 Required Equipment**

### **1.2.1 Internal Communications**

The facility is equipped with an internal communications and alarm system capable of providing immediate emergency instruction (or signal) to facility personnel. Internal communications and alarms consist of the following:

1. Emergency air horns;
2. Pull alarms; and
3. Telephones.

### **1.2.2 External Communications**

The facility is equipped with telephones and pull alarms capable of summoning emergency assistance from local police departments, fire departments, or other emergency response departments. Local emergency assistance is readily available by dialing 911. The facility fire alarms are direct to the Tampa Fire Department.

### **1.2.3 Fire, Spill and Decontamination Equipment**

The facility is equipped with portable, multipurpose (ABC) fire extinguishers; Halon and Metal-X fire extinguishers are also available. The CSB is equipped with sprinkler systems and smoke and flame detectors. The facility has a continuous automatic fire monitoring system. Fire alarms automatically notify the Tampa Fire Department of emergency fire or smoke conditions.

The flammable materials storage bay (Bay 2) is equipped with an automatic high expansion foam fire suppression system. Bay 2 is also equipped with a lower explosive limit (LEL) monitoring system. The LEL meters are mounted so that vapors less dense than air and vapors more dense than air are both monitored. Emergency exhaust fan ventilation is automatically activated at 10% of LEL. The foam system is automatically activated at 10% of LEL. An alarm to the Tampa Fire Department is also activated at the 10% LEL. Fire control equipment is identified on the building as-built record drawings included in Attachment 6.

The shredder located in the WPB is intrinsically safe and has a self-contained CO<sub>2</sub> fire suppression system. The fire suppression system utilizes automatic detection, manual activation, notification signals and relay contacts for equipment shutdown controls. The system automatically notifies the Tampa Fire Department of emergency fire conditions.

Spill control, fire, explosion and other supplemental safety equipment are located throughout the facility. The equipment is readily available to facility personnel. The equipment is described in the Contingency Plan Section 2.3 of this document and the supplemental emergency equipment listed in Appendix C. Decontamination equipment is readily available at the facility. The need for decontamination is minimal. Most personal protective equipment (PPE) and sampling equipment is disposable, thereby eliminating the need for decontamination. Water and decontamination solutions such as trisodiumphosphate (TSP), bleach, detergent, lime, and citric acid, are available for decontamination. Mercury spill cleanup materials (e.g. HgX, Mercsorb or equivalent) are also available.

#### **1.2.4 Water Volume and Pressure**

The facility has water available at adequate volume and pressure to supply firefighting equipment. The water volume is rated at 463 gallons per minute (gpm) volume and 32.4 pounds per square inch (psi) pressure at the base of a 6-inch diameter riser. A jockey pump connected to the city water supply augments the suppression system.

### **1.3 Testing and Maintenance of Equipment**

All equipment at the EQ facility will be maintained and tested in accordance with the manufacturer's recommendations. EQ has a maintenance agreement with a fire control firm to maintain the fire control equipment. The equipment included in this agreement include the foam, LEL, smoke detector, flame detector, fire control panel, sprinkler, piping, and fire alarm systems. EQ will inspect this equipment as outlined in the inspection plan. The fire control firm will inspect the equipment (at minimum) annually. This will serve to keep the equipment operational for use in times of emergency.

### **1.4 Access to Communications or Alarm Systems**

Communications and alarm systems are indicated on the building as-built record drawings included in Attachment 6 and for the Waste Processing Building in Attachment 5. Access to communications and alarm systems is readily available to all employees regardless of their location. It is EQ company policy that at least two employees will be present before entering any active operating portion of the facility. If there is ever just one employee entering any active operating portion of the facility, the employee will have immediate access, at the scene of operation, to a communications device (such as telephone) capable of summoning external emergency assistance.

## **1.5 Required Aisle Space**

The EQ facility has been designed for the safe unobstructed movement of personnel, fire protection equipment, spills control equipment, and decontamination equipment to any area of facility operation in an emergency. There will be a minimum of two feet of aisle space between double rows of containers (or between rows of pallets of containers). The actual aisle space between rows of containers and pallets is usually three feet. The Container Storage Building is shown on Attachment 4 and the as-built record drawings for the building are included on Attachment 6. Containers (or pallets of containers) may be stored over the containment sumps. The containment sumps will be visible and aisle space will be maintained with containers (or pallets of containers) stored over the sump. The containers (or pallets of containers) can easily be moved to remove any material from the sumps. No containers (or pallets of containers) will be stored within two feet of any safety equipment located on any wall. Adequate aisle space will be maintained to access all safety, spill control, and decontamination equipment stored along any wall. Hazardous waste inbound, outbound, and transfer facility shipments are loaded on transportation vehicles in accordance with all applicable DOT and RCRA regulations. Materials such as containers or pallets of containers can be easily unloaded and transferred to the storage building or another transport vehicle should any emergency require unloading of waste containers from a transport vehicle.

## **1.6 Arrangements with Local Authorities**

The EQ Contingency Plan has been submitted to all required agencies in both hard copy and electronic format. A list of these agencies is provided in the Contingency Plan (Section 2.3). All agencies have been invited to tour the facility to become familiar with the layout, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and facility evacuation routes.

No agency identified in the EQ Contingency Plan has notified EQ that they would not be able to respond to any potential emergency. Most of the agencies listed have utilized or contracted EQ for emergency response operations. This has provided a degree of familiarity between EQ and responding agency personnel.



## **2.0 HAZARDOUS WASTE CONTINGENCY/EMERGENCY RESPONSE PLAN**

This Contingency/Emergency Response Plan contains detailed information on how the facility will respond to and report a hazardous waste incident. The various EQ emergency response coordinators are provided in the first section so they are readily available. Subsequent sections contain information on handling a response, interagency agreements, government agency notification, post-emergency operations and reporting.

### **2.1 General Information/Introduction**

The facility is designed to minimize the potential for any release of hazardous wastes or constituents. Vehicles are able to load and unload directly to and from the warehouse. Virtually any potential release would be contained by the warehouse and its sumps, or within the vehicle. The vehicle transfer area, referred to as the covered processing area, is sloped and diked for containment (Attachment 4). A 10,000-gallon epoxy lined Improved Secondary Containment Area is located in front of Bay 2. Waste materials are segregated by hazard class to insure that no incompatible wastes are stored together. All flammable materials are stored in a separate Bay designed solely for that purpose. The building is fully sprinkled. The flammable storage area has an automatic foam fire suppression system. The building has both smoke and flame detectors which are continuously monitored. A lower explosion limit (LEL) system is located in the flammable area. An automatic ventilation system is activated at 10% of the LEL. The automatic foam fire suppression system, fire alarm, and monitoring service emergency call to the Tampa Fire Department are activated at 10% of the LEL.

Fire extinguishers and fire hoses are located throughout the facility. Safety equipment, proximity suits, SCBA and material handling equipment are located at the site. Supplemental emergency safety equipment is listed in Appendix C. Hazardous materials potentially on-site may include: acids, alkalis, poisons, flammables, combustibles, oxidizers, reactives and other regulated solids or liquids which do not fall into these classifications. Most will be present in small quantities or in diluted concentrations when compared to the original raw material. No regulated radioactive, pathological, or explosive materials will be located at this facility. A daily inventory of all materials stored at this facility is readily available.

In the event of a power outage, emergency backup lighting is provided in the facility, and the ADT security system will activate its backup battery.

In order to prevent releases to the atmosphere, containers will remain closed at all times except when it is necessary to add or remove waste from the container.

All operations personnel at this site are trained in emergency response, hazardous waste operations, firefighting procedures, emergency first aid, and CPR.

#### **2.1.1 Purpose**

The purpose of this plan is to provide EQ employees and responding agencies with an organized procedure for responding to unusual occurrences or emergencies involving hazardous chemicals and/or wastes when such releases could cause potential harm to human health or the environment. This plan is designed to present as simply as possible the necessary steps required in an emergency.

Emergencies covered under this procedure are fires, explosions, floods, hurricanes or an unplanned sudden and non-sudden release into the environment of hazardous waste including liquids, vapors and particulates which could cause harm to human health or the environment.

### **2.1.2 Implementation**

This Contingency Plan will be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater at the facility, which could threaten human health or the environment.

### **2.1.3 Copies of Contingency Plan**

Copies of the Contingency Plan are maintained at the administration building located on the 8<sup>th</sup> Avenue (southern) property and in the facility office on the Orient Road property. Key personnel such as Emergency Response Coordinators and Alternates also have copies of the Contingency Plan.

Copies of the Contingency Plan have previously been submitted to Tampa Police, Tampa Fire, FDEP, Tampa General Hospital and Brandon General Hospital and will be resubmitted following approval of this permit application.

### **2.1.4 Amendment of Contingency Plan**

The EQ Contingency Plan will be reviewed at least annually and immediately amended, if necessary, whenever:

1. The EQ facility permit is revised;
2. The plan fails in an emergency;
3. The facility changes design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
4. The Emergency Coordinators list changes; or,
5. The emergency equipment list changes.

## **2.2 EQ Emergency Response Coordinators**

At all times, there will be at least one employee either at the facility or on call with the responsibility for coordinating all emergency response operations. The coordinator and alternates are thoroughly familiar with all aspects of the EQ Contingency Plan, all facility operations, the location and characteristic of wastes managed, the location of facility records, and the facility layout. The designated Emergency Response Coordinator and Alternates are summarized below:

	<b>Coordinator</b>	<b>Primary Alternate</b>	<b>Secondary Alternate</b>
<b>Name</b>	Gene Cieply	Stuart Stapleton	Ken Dean
<b>Address</b>	1251 Horsemint Lane	619 Cedar Grove Dr.	8221 Swiss Chard Circle
<b>City, State, &amp; Zip</b>	Wesley Chapel, FL 33543	Brandon, FL 33511	Land O' Lakes, FL 34637
<b>Work Phone #</b>	813-319-3410	813-319-3423	813-319-3433
<b>Home Phone #</b>	813-777-3998	813-412-2302	813-994-3892
<b>Mobile #</b>	813-777-3998	813-770-9954	813-748-4403

All emergency Coordinators and Alternates have authority to commit corporate funds and resources during an emergency incident involving a fire, explosion, or release of hazardous waste(s) and or constituents to

the air, soil, surface water, or ground water at the facility which could threaten human health or the environment.

### 2.3 Coordination Agreements

The City of Tampa Fire Department, Tampa Police Department, FDEP, hospitals (Tampa General and Brandon General Hospitals) and an outside spill response contractor have been notified as to the operation of this facility. All agencies have been invited to inspect the site and become aware and familiar of waste locations, access, on-site emergency equipment, and available fire protection items. A copy of the contingency plan has been sent to these organizations. An agency notification contact list is provided below.

Agency	Emergencies Notified For:	Telephone #
Tampa Fire Department	Any Potential fire or explosion	911 (Emergencies) 813-232-6800
Tampa Police Department	Any evacuation, traffic or security issue	911 (Emergencies) 813-231-6130
State Watch Office	All Contingency Plan incidents	800-320-0519
State Emergency Response Team	All Contingency Plan incidents	850-413-9911
Florida DEP SW District	All Contingency Plan incidents	813-470-5700
EQ Florida, Inc.	All Contingency Plan incidents	813-623-5302 800-624-5302(24hr)
Brandon General Hospital	Any Medical emergency	911 (Emergencies) 813-681-5551
Tampa General Hospital	Any Medical emergency	911 (Emergencies) 813-844-7000

### 2.4 Emergency Equipment & Communications Systems

This chapter describes the emergency equipment and alarm systems within the CSB and the WPB at the EQ facility. Supplemental emergency and safety equipment located at EQ is listed in Appendix C.

1. **Fire extinguishers** are located throughout and are identified by signs and red markings. ABC extinguishers are located in Bays 1 and 3. Halon and metal-x extinguishers are located in the flammable storage area (Bay 2). ABC fire extinguishers are also located throughout the WPB and CSB and are prominently identified by signs and red markings.
2. **Chemical Spill Treatment Kit** containing 6 2-pound containers of Spill-X-S (100% carbon) used for solvent spills is located in Bay 2.
3. **Oil-Dri** and **Vermiculite** are used for solvent and oil spills. Located on the ramp leading to Bay 3 in bags identified with the words Oil-Dri or Vermiculite.
4. **Soda Ash** is used to neutralize acids. Located in Bay 1 in bags identified by the words Soda Ash.
5. **Caustic Spill Treatment Kit** containing 6 2-pound containers of Spill-X-C (75% Citric Acid) used for caustic spills is located in Bay 3.
6. **Spill control/sorbent booms/pads** used to contain any spill. Spill control booms are available in various lengths and are located in Bay 3. Secondary containment is provided in the waste processing building and spill control supplies are available onsite for incidents within this structure as necessary.
7. **Protective Clothing** is located in Bays 1 and 3. Protective Suits are available in Levels B through D. Appropriate PPE, including chemical resistant suits, safety glasses, splash guards, and hardhats, for the activities completed in the WPB and CSB are available.

8. **Full-face respirators**, located in Bays 1 and 3, and **SCBA**, located in Bay 1 and the main office, are available for respiratory protection.
9. **Gloves, boots, face shields, goggles and hard hats** may be used as protective equipment and are located in Bays 1 and 3. This protective equipment is also available in the facility office building for waste management activities conducted in the waste processing building.
10. **Acid Spill Treatment Kit** containing 6-2 pond containers of Spill-X-A (78% Magnesium Oxide) used for acid spills is located in Bay 1.
11. **Air powered pumps with hose** for removal of liquids or water. Identified by lack of electrical connection and are capable of fitting inside of a drum bung are located in Bays 1 and 3.
12. **Manual pump** for removal of any flammable liquids.
13. **Shovels, brooms, buckets, mops, tools, bung wrenches**, etc. are located in Bays 1, 2 and 3, as well as at the waste processing building.
14. **Telephones** located on the north and south walls of the main storage area and in the office area.
15. Empty **DOT-approved containers** for recontainerizing damaged or leaking containers are located in Bays 1 and 3.
16. Empty **85 and 110 gallon overpack drums** for recontainerizing damaged or leaking containers are located in on the ramp leading to Bay 3.
17. An **emergency eye wash/shower** is located in both Bays 1 and 3. An emergency eye wash/shower is also located in the northeast corner of the waste processing building.
18. **Flame and smoke detectors** are located in the flammable storage area. **Lower explosive limit (LED)** monitors are located in the flammable storage area and smoke detectors are available in the general storage area. The new industrial shredder located in the waste processing building has a self-contained CO<sub>2</sub> fire suppression system. The fire suppression system utilizes automatic detection, manual activation, notification signals and relay contacts for equipment shutdown controls.
19. **On-site laboratory and HAZCAT identification kit** available as necessary to characterize a sample of a potential hazardous material. The HAZCAT SOPs are contained in Appendix D.

The emergency communication system equipment consists of:

1. **Air horns** are located throughout the hazardous waste storage area. In case of a spill, explosion, or other emergency, these can be used to alert all employees that evacuation is necessary.
2. An **intercom system** for verbal notification is located throughout the waste management building. Non-evacuation commands are to be given over the intercom.
3. Twenty-four hour **monitored alarms** are located throughout the facility.
4. **Mobile phones** are available at the facility.
5. **Telephones** are available at the facility.

## **2.5 Evacuation Plan**

Emergency situation and evacuation notification procedures are discussed in this section.

1. Notification to evacuate the EQ facility in an emergency would be handled by one of several methods. These are:
  - a. Emergency air horns are located throughout the facility and are sounded when evacuation is necessitated.
  - b. An intercom system is also located throughout the facility and can also be used for notifying employees to evacuate the building. Verbal commands will be given should the intercom system be inoperative.
  - c. Pull alarms are located throughout the facility.
  - d. Phones are available throughout the facility.
  - e. Mobile phones are also available at the facility.
2. In the event of an emergency situation (spill, fire, explosion) the first employee to notice the emergency is to immediately sound the emergency air horns and/or alarms located throughout the building.
3. All personnel are to evacuate the facility. The evacuation routes are shown on Attachment 7. The primary evacuation route should be used unless blocked or impassable. In that situation, the secondary evacuation route should be employed.

## **2.6 Emergency Procedures & Facility Personnel Actions**

The purpose of this section is to establish the organizational structure which will be in force during a response to a chemical emergency and what procedures will be utilized to notify corporate officials, outside response teams, local government authorities, and State and Federal Regulatory Agencies.

### ***2.6.1 Internal Communications***

In the event of an emergency situation involving hazardous chemicals or wastes, the emergency response coordinator or designate alternate shall be responsible for coordinating the necessary response and/or cleanup.

EQ Florida, Inc.  
7202 East 8<sup>th</sup> Avenue  
Tampa, FL 33619  
813-623-5302 or 800-624-5302

EQ management is to be notified immediately upon discovery of an emergency situation involving hazardous chemicals or wastes. Management will notify, via telephone, radio, mobile telephone or pager, the required EQ personnel for response to the scene. EQ emergency response vehicles are equipped with necessary cleanup/safety materials and first aid supplies. Trailers, sheds, and lockers on site also contain safety equipment and supplies.

### ***2.6.2 External Communications***

In any emergency situation, contact the following:

1. Tampa Fire Department (**911**). Indicate the extent and type of emergency which exists (fire, spill, etc.).

2. In the event of emergencies involving chemical spills, leaks, or explosions (which may require additional assistance), at the direction of the EQ Emergency Coordinator/Alternate a spill response contractor can be notified.

### **2.6.3 Government Agency Notification**

In the event of an emergency EQ will comply with all requirements contained in Chapter 62.150, Hazardous Substance Notification. In the event of an emergency where environmental contamination is eminent, in addition to notifying the Tampa Fire Department (**911 emergencies**), the following governmental agencies will be notified by the EQ Emergency Coordinator/Alternate. Initial notification to the National Response Center will be completed within 15 minutes of the incident. Further, the State will be notified within 24 hours as provided in Chapter 62-150, F.A.C.

- |  |  |
|--|--|
| 1. State of Florida Warning Point<br>850-488-1320  | 2. FDEP OER State Watch Office<br>800-320-0519                   |
| 3. National Response Center (NRC)<br>800-424-8802  | 4. State Emergency Response Team<br>850-413-9911                 |
| 5. FDEP Southwest District Office<br>Tampa, Florida<br>813-470-5700 (normal working hours) | 6. Hillsborough County<br>Solid Waste Department<br>813-272-5680 |

In addition to the NRC, the government official designated as the FDEP On-Scene Coordinator (OSC) must be contacted. This can be accomplished by calling 850-488-1320.

The following information will be communicated to the governmental agencies contacted:

1. Name and telephone number of the reporter.
2. Name and address of the facility.
3. Time of the incident.
4. Type of incident (whether fire, explosion, or release).
5. Name of the material released.
6. Quantity of the material released.
7. Additional information such as liquid, vapor, or solid.
8. Type of incident (release from drum, tank, truck, or warehouse).
9. Extent of injury or injuries, if any.
10. Possible hazards to human health or the environment, outside the facility.
11. Weather conditions (wind direction, rain, etc.).
12. Potential for release or spill of material into surface waters.

Within 15 days of any incident the facility manager will notify the FDEP, electronically, that the Contingency Plan has been implemented. All of the aforementioned items will be addressed as well as the quantity and disposition of all recovered materials resulting from the incident. The FDEP SW District Office notice will be provided to the Compliance Assurance Program electronically at: SWD\_Waste@dep.state.fl.us.

### ***2.6.4 Identification of Hazardous Materials Locations***

The warehouse doors (west / front side) are placarded with the hazard class of the material stored in that particular Bay. The Bay contents are summarized below.

#### **Bay 1 – North Bay:**

1. Acids
2. Toxic Organics and Metals
3. Non-flammable solvents and halogens
4. Asbestos

#### **Bay 2 – Center Bay:**

1. Flammable liquids and solids
2. Reactive cyanides, sulfides, and metals

#### **Bay 3 – South Bay:**

1. Poisons
2. Oxidizers
3. Caustics
4. Non-Regulated Materials

All vehicles containing hazardous waste are placarded and manifested per DOT and RCRA requirements. The placards will identify the hazard class of each trailer, roll-off, tanker, or vehicle.

#### **Transfer Facility Vehicles – Located in the vehicle loading and unloading areas:**

1. Trailers
2. Box Trucks
3. Vans
4. Tankers
5. Roll-Offs

Processing equipment at the facility operates on a batch mode. The equipment will be shut off and disconnected when emergency situations occur. Waste containers in process will be closed when the equipment is shut down for an emergency.

#### **Processing Equipment**

1. Paint Can Crusher
2. Drum Crusher
3. Transfer Pumps (portable air, electric, and manual)
4. Shredder

The satellite accumulation (5 gallon or less) of flammable, corrosive, chemical rags, and battery wastes also occurs in the Office/Lab.

### ***2.6.5 Waste Types Managed***

Approximately 1/3 of the waste managed at the facility is non-hazardous or non-regulated. These containers can be identified by a blue "Non-Regulated Waste" or a green "Non-Hazardous" label. The material presents **no hazard** (such as poison, flammable, corrosive, reactive, oxidizer) if the container does not have a DOT label. However, any release must be contained to prevent a release which may potentially contaminate waters or soils.

Several trailers may be at the facility which do not contain hazardous or non-hazardous wastes. These trailers may be empty, contain new empty drums, or contain used empty drums for recycling. No potential hazard is associated with these vehicles.

The emergency response coordinator or alternate will coordinate the identification of hazardous materials involved in an emergency incident requiring implementation of the contingency plan. A complete inventory of all waste materials is available at the facility. The identification can be narrowed by the source of the incident. For example, if an incident occurred in Bay 2 of the warehouse, the materials would be limited to flammables and reactives. All containers are identified by a unique EQ identification number, DOT hazard class labels, and hazardous waste shipping labels. The contents of any container can be fully characterized if the EQ identification number is known. EQ has an on-site laboratory should it be necessary to characterize a sample of a potential hazardous material. The coordinator or alternate is therefore able to identify the source, characteristics, amount, and extent of any released materials, by observations, review of facility data, records and shipping documents, or by chemical analysis.

#### ***2.6.6 Hazardous Materials Emergency Response References***

The following is a list of references available at EQ:

1. HAZARDOUS CHEMICAL DATA, Department of Transportation/U.S. Coast Guard.
2. HAZARDOUS MATERIALS EMERGENCY RESPONSE GUIDEBOOK, Department of Transportation/DOT P 5800.2.
3. MERCK INDEX.
4. HANDBOOK OF HAZARDOUS MATERIALS, Sax.
5. NFPA 101 LIFE SAFETY CODE.
6. CANCER CAUSING CHEMICALS, Sax.
7. TOXIC ORGANIC CHEMICALS, E. Ellsworth Hackman III.
8. NIOSH REGISTRY OF TOXIC EFFECTS OF CHEMICAL SUBSTANCES.
9. EMERGENCY FIRST AID, American Red Cross.
10. CONDENSED CHEMICAL DICTIONARY, Hawley.
11. HAZARDOUS MATERIALS, SUBSTANCES, & WASTES COMPLIANCE GUIDE.

### **2.7 Hazard Assessment**

The emergency response coordinator or alternate will assess the potential hazards to human health or the environmental that may result from a release, fire, or explosion of hazardous waste or hazardous waste constituents. The assessment will consider both direct and indirect effects of the release, fire, or explosion.

The contingency plan will be implemented whenever the emergency coordinator/alternate determines an imminent or actual hazard exists which could threaten human health or the environment. This section provides the criteria used by the emergency coordinator/alternate in making the decision to implement the contingency plan.

#### ***2.7.1 Fire or Explosion***

For incidents involving a fire or explosion, the following situations will result in contingency plan implementation:

1. A fire which could cause the release of toxic fumes.



2. A fire which could spread and possibly ignite other materials or which could cause heat-induced explosions.
3. A fire which could spread to off-site areas.
4. The use of water or chemical fire suppressants which could result in contaminated runoff.
5. The imminent danger of an explosion which could result in a safety hazard due to flying fragments or shock waves.
6. The imminent danger of an explosion which could result in the release of toxic materials.
7. The occurrence of any explosion.

### **2.7.2 Fire Fighting Procedures**

The EQ facility is equipped with both smoke and flame detectors. Both are monitored on a twenty-four hour per day basis. If either are activated, the sprinkler and/or foam systems will automatically engage. The Tampa Fire Department is notified automatically by the continuous alarm/monitory system.

Also included in the monitoring system is a lower explosive limit (LEL) detector within the flammable storage area. There are two detectors. One is mounted in the spill sump to detect vapors which are denser than air. The second is mounted on the ceiling to detect vapors less dense than air. If vapors in the flammable area exceed 10% of the lower explosive limit, the ventilation system will automatically engage and the sprinkler and foam systems will be activated automatically. The Tampa Fire Department is notified automatically at 10% LEL.

Located throughout the facility are fire extinguishers for Class A, B or C fires. Located in the flammable area are Halon extinguishers (or equivalent). Fire hoses are located throughout the building.

In the event of a fire, the following activities will be performed:

1. Notify other employees. If evacuation is necessary, sound the air horns and alarms.
2. Notify the Tampa Fire Department (911).
3. Move all transport vehicles away from the loading or unloading areas.
4. Control the fire with extinguishers if it can be done safely.
5. The facility is designed for minimal manual fire suppression.
6. Notify necessary agencies as indicated.

### **2.7.3 Unplanned Material Release**

The contingency plan will be implemented for any release to the environment which results in one or more of the following conditions:

1. A spill which could result in the release of flammable liquids or vapors, thereby causing a fire or explosion hazard.
2. A spill which could cause the release of toxic liquids or fumes.
3. A spill which could be contained on the site, but which could potentially result in groundwater contamination.
4. A spill which cannot be contained on the site resulting in off-site soil, groundwater, or surface water contamination.
5. Any flooding of the site which could result in surface water contamination.

## **2.8 Personal Protective Equipment**

In order to provide adequate protection from hazardous exposures, personal protective equipment must be used. The following indicates various hazardous situations and the personnel protective equipment which is required.

### **2.8.1 Level A Protection**

#### Hazard Involved:

- Situations immediately dangerous to life and health.
- Oxygen deficient atmospheres.
- Unknown hazardous materials.
- Chemicals which can be absorbed through the skin.
- Materials which cannot be removed with an air purifying respirator.

#### Required Personal Protective Equipment:

- SCBA or airline respirator with SCBA escape air system.
- Full body encapsulation suit.

### **2.8.2 Level B Protection**

#### Hazard Involved:

- Oxygen deficient atmosphere where chemical composition of the material is known and falls into the classification of an irritant.

#### Required Personal Protective Equipment:

- SCBA or airline respirator with SCBA for emergency use.
- PVC splash suit with hood.
- Neoprene/nitrile/butyl rubber arm length gloves.
- Steel-toed rubber boots.

### **2.8.3 Level C Protection**

#### Hazard Involved:

- Situations not immediately dangerous to life and health.
- Sufficient oxygen present to support life.
- Irritant or corrosive chemicals.
- Contaminated soils.
- Liquid/solvents not immediately dangerous to life and health.

#### Required Personal Protective Equipment:

- Full face mask with air purifying (cartridge) respirator; or, half face (cartridge) respirator with goggles and face shield.
- PVC splash suit.
- Protective gloves (type dependent on chemical being handled).
- Steel-toed rubber boots.
-

## **2.8.4 Level D Protection**

### Hazard Involved

- Situations which contain no immediate hazard, but where there is the potential for accidental release of a hazardous substance.

### Required Personal Protective Equipment

- Half face air purifying (cartridge) respirator.
- Safety goggles.
- Disposable coveralls.
- Surgical rubber gloves or suitable hand protection. Rubber boots.
- Steel-toed shoes.

## **2.9 Containment and Control Measures**

The purpose of this section is to alert all emergency response groups, regulatory agencies and affected parties, as to the location of the hazardous waste storage areas within the facility, the design of containment control, and the procedures to be followed in response to emergencies, whether fire, explosion or spill. **It must be understood that potentially toxic gases and vapors may be present in any incident involving hazardous materials.**

### **2.9.1 Entrance Procedures**

The following procedures are to be followed by all response personnel before entering the hazardous waste storage areas in emergency situations:

1. Consult the attached facility drawing (Attachment 1) which indicates both types and locations of materials which would be stored in the area to be entered. A general description of these areas is included in the next section.
2. Assume toxic/hazardous materials are present in the area. A complete inventory is kept in the office area.
3. Select proper protective gear, including SCBA.
4. Consult DOT P 5800.2 HAZARDOUS MATERIALS EMERGENCY RESPONSE GUIDE BOOK which is in the office area.

Remember, the primary responsibility during initial emergency response efforts is to save lives and protect the environment.

### **2.9.2 Fire or Explosion Response Procedures**

1. Notification to evacuate the EQ facility in an emergency would be handled by one of several methods. These are:
  - a. Emergency air horns are located throughout the facility and are sounded when evacuation is necessitated.
  - b. An intercom system is also located throughout the facility and can also be used for notifying employees to evacuate the building. Verbal commands will be given should the intercom system be inoperative.
  - c. Pull alarms are located throughout the facility.
  - d. Phones are available throughout the facility.

- e. Two-way radios are available at the facility.
  - f. Most hazardous waste operations employees have pagers.
  - g. Mobile phones are available at the facility.
2. In the event of an emergency situation (fire or explosion) the first employee to notice the emergency is to immediately sound the emergency air horns and/or alarms located throughout the building.
  3. All employees are to don the necessary protective equipment including self-contained breathing apparatus (SCBA). This equipment is located in the safety equipment cabinets in Bay 1 and Bay 3 of the facility, in the storage room in the office, and on the safety equipment and supply trailer. Additional safety equipment is provided in these locations. Supplemental safety equipment for various situations is included in Appendix C.
  4. Firefighting should begin immediately under the direction of the facility manager/supervisor until the EQ Emergency Coordinator/Alternate arrives on-site. Procedures are identified later in this chapter. Refer to the CHRIS (Chemical Hazardous Response Information System) Manual for additional information.
  5. The facility supervisor is to contact the EQ Emergency Coordinator/Alternate immediately (telephone numbers are listed).
  6. In the event of a fire or explosion, the sprinkler and foam systems will be automatically activated. Both the alarm and sprinkler system are monitored on a 24-hour basis. When the alarm or sprinklers are activated, the Tampa Fire Department will be notified immediately and automatically.
  7. Electric service to the building should be shut off in the event of a fire or explosion. The main electric shut off is located on the outside south wall of the container storage building. No additional process systems, valves, gauges or equipment are required to be monitored or shut down since no potentially dangerous processes are employed at the facility.
  8. All waste handling or processing in the affected area will be stopped immediately.
  9. All waste feed lines and waste processing equipment will be shut down when this can be done safely. There are no continuous treatment processes. All treatment is on a batch basis. Power outages will simply make these processes inoperable.
  10. In situations immediately dangerous to life and health (IDLH), evacuation of the facility may be necessary. This decision will be made by the Emergency Coordinator/Alternate or facility supervisor. If the evacuation occurs, the primary evacuation route should be used unless blocked or impassable. In that situation, the secondary evacuation route should be employed. Both routes are prominently outlined at the facility and are included with this plan.

### ***2.9.3 Spill or Release Response Procedures***

In the event of a spill, certain procedures must be instituted immediately. The facility is designed so that the rupture of containers would result in no release of contaminants outside of the facility.

The storage area for acidic and alkaline wastes are segregated to ensure that no co-mingling of these materials will result.

All flammable/combustible materials are stored in a separate Bay.

All incompatible materials have separate containments.

Immediately contact all required individuals/agencies indicated in Section 2.2 of this document. These telephone numbers are posted at all facility telephones.

Should a spill or release occur, the following steps are to be taken:

1. Sound an alarm to notify an emergency.
2. Don protective equipment located in safety cabinets.
3. Contact EQ Emergency Coordinator/Alternate.
4. The source of the spill/release will be determined and corrected. Further, the character, estimated amount and extent of the release will be determined by appropriate emergency response personnel.
5. Waste handling or processing in the affected area will be stopped immediately.
6. All waste feed lines and waste processing equipment will be shut down as soon as this can be done safely.
7. All non-response personnel will leave the area immediately.
8. All injured persons will be removed from the area and treated by qualified medical personnel.
9. Contain the spill with sorbent boom, sorbent pillows, or bulk sorbent material. All sorbents and booms are stored in the spill control storage area.
10. In the event of an acid spill, use calcium carbonate or lime to neutralize the spill.
11. Use citric acid to neutralize alkaline spills.
12. Once the spill has been contained, begin cleanup.
13. Contact the response contractors and request mobilization of personnel or equipment, if necessary. EQ will serve as the primary response contractor and SWS will serve as alternate, or backup response contractor.
14. The emergency coordinator/alternate will contact all required agencies.
15. Note the discharge in the operating record.
16. A complete list of response action for specific chemical spills is included.
17. If immediate evacuation of the building is required, two 5-minute egress bottles are attached to the supplied air system. Additional respiratory and personal protective clothing are located in the safety equipment cabinet located in Bay 3 of the facility.
18. In the event that a release outside the facility leads to surface water, groundwater or soil contamination, EQ will contact the contractors' listed or other suitable contractor for all required remediation efforts.

#### ***2.9.4 Care of the Injured***

The objective is to provide first aid or immediate care for a person who has been injured, or has been suddenly taken ill, in the event of an emergency. Implement emergency first aid as required.

All facility employees of EQ shall have been trained in standard first aid and cardiopulmonary resuscitation (CPR) programs offered and presented by the American Red Cross. First aid kits will be located in the office area.

In the event of an emergency, the EQ facility manager shall be in charge until the arrival of the Emergency Coordinator/Alternate.

All injured shall be taken to Brandon Hospital or Tampa General Hospital by the local ambulance service. These hospitals will have been notified as to the type of injuries which may result at our facility. In an emergency situation, they should be informed of the extent of the emergency and what injuries to expect. Routes to the hospitals are included on Attachment 8.

The nearest life squad is the City of Tampa. They can be contacted by dialing 911.

## **2.10 Post-Emergency Operations**

### ***2.10.1 Decontamination Procedure***

After an emergency incident, decontamination of equipment is required. All expendable items, such as sorbent, booms and so on are to be placed into 55 gallon drums and disposed as required by state and federal law. Non-expendable items such as tools, chemical suites and material handling equipment are to be cleaned in an appropriate solvent and placed back in their normal location. The suitable solvent will be determined by an EQ senior chemist. Disposal of the spent solvent will comply with applicable regulations.

All tanks and containerized waste will be thoroughly inspected for leaks, pressure build-up and structural integrity by the site supervisor. Any deficiencies will be immediately corrected.

Air monitoring will be performed as required to ensure the facility is safe to resume normal operations.

A supplemental list of available emergency equipment is included in Appendix C. Specific decontamination solutions are included in this Contingency Plan.

Operations at the facility will not commence until such time as all emergency equipment has been cleaned, replaced and restored to its original location. All emergency equipment will be tested to determine its effectiveness prior to resuming operation after an emergency incident

### ***2.10.2 Re-Entry Monitoring***

Before employees are allowed to return to the area after an emergency, the on-site Emergency Coordinator/Alternate will confirm the area is safe for re-entry. This will be accomplished by physical inspection of the area, the use of detection equipment, followed by decontamination as necessary. Chemical detection equipment available to the Emergency Coordinator/Alternate is as follows (note, these items are located in the office area):

1. Chemical detector tubes (Draeger, MSA)
2. Explosion meter
3. Portable Organic Vapor Analyzer (OVA)
4. Portable pH/specific ion meter
5. A fully equipped environmental laboratory is located nearby. Any wet chemical or instrumental analyses can be performed as required.

### ***2.10.3 Decontamination Procedures***

#### **Inorganic/Organic Acids**

Prepare mixture of 10% sodium carbonate or 10% hydrated lime or 10% trisodium phosphate in water; clean items/area with mop or cloth. Wear protective equipment.

#### **Alkali (Caustics)**

Prepare mixture of 5% acetic acid (vinegar) or 5% citric acid in water; clean items/area with mop or cloth. Wear protective equipment.

### **Oils and PCB**

Methylene chloride or isooctane applied directly to the contaminated area. Remove solvent and contaminant with sorbent or absorbent cloths. Wear protective equipment.

### **Alkali and Alkaline Earth**

Metals (sodium, potassium, phosphorus)

Cover immediately with dry soda ash (sodium-carbonate) and remove with broom and shovel. Keep dry; do not contact with water. Wear protective equipment.

### **Solvents**

Cover with absorbent material as quickly as possible. Remove with broom and shovel. Wear protective equipment.

### **Mercury**

Recover as much bulk Mercury as possible. Cover the spill area using Mercsorb, HgX or equivalent. Spray with water to activate the material. Wear protective equipment. Keep area well ventilated.

## ***2.10.4 Emergency Waste Movement Coordination***

In the event of an emergency situation where the movement of waste materials is required, the following procedures are to be employed:

1. Contact the emergency response coordinator or alternate.
2. Contact EQ and/or subcontract drivers.
3. Perform waste characterization verification as described in the EQ Waste Analysis Plan.
4. Contact FDEP Emergency Response Group, and the District Office in Tampa to inform them of the emergency waste movement.
5. Load waste into drums, tankers, roll-off containers, or other suitable containers.
6. Load the containers to the vehicles. Follow all applicable DOT regulations pertaining to placarding, labeling, and loading.
7. Complete all shipping documents as required.
8. Dispatch waste shipments to secondary approved permitted waste treatment or disposal facilities.

## ***2.10.5 Post-Emergency Assurances***

No waste material that may be incompatible with any released material will be treated or stored in the portion of the facility where any release occurred until cleanup procedures are complete. All emergency equipment listed in this Contingency Plan will be cleaned and fit for its intended use before hazardous waste management operations are resumed. Inoperable emergency equipment will be serviced, repaired, or replaced.

## ***2.10.6 Post-Emergency Documentation***

### **Operating Record**

EQ will note in the facility operating record the time, date, and details of any incident that requires implementing the EQ Contingency Plan.

### **Reporting**

EQ will submit a written incident report to the FDEP within 15 days after any incident requiring implementation of the EQ Contingency Plan. The report will include the following information:

1. Name, address, and telephone number of EQ's contact (operator);
2. Name, address, and telephone number of EQ facility;
3. Date, time, and type of incident;
4. Name and quantity of materials involved;
5. The extent of injuries, if any;
6. An assessment of hazards to human health or the environment, if applicable; and the estimated quantity and disposition of any recovered materials which may result from the incident.

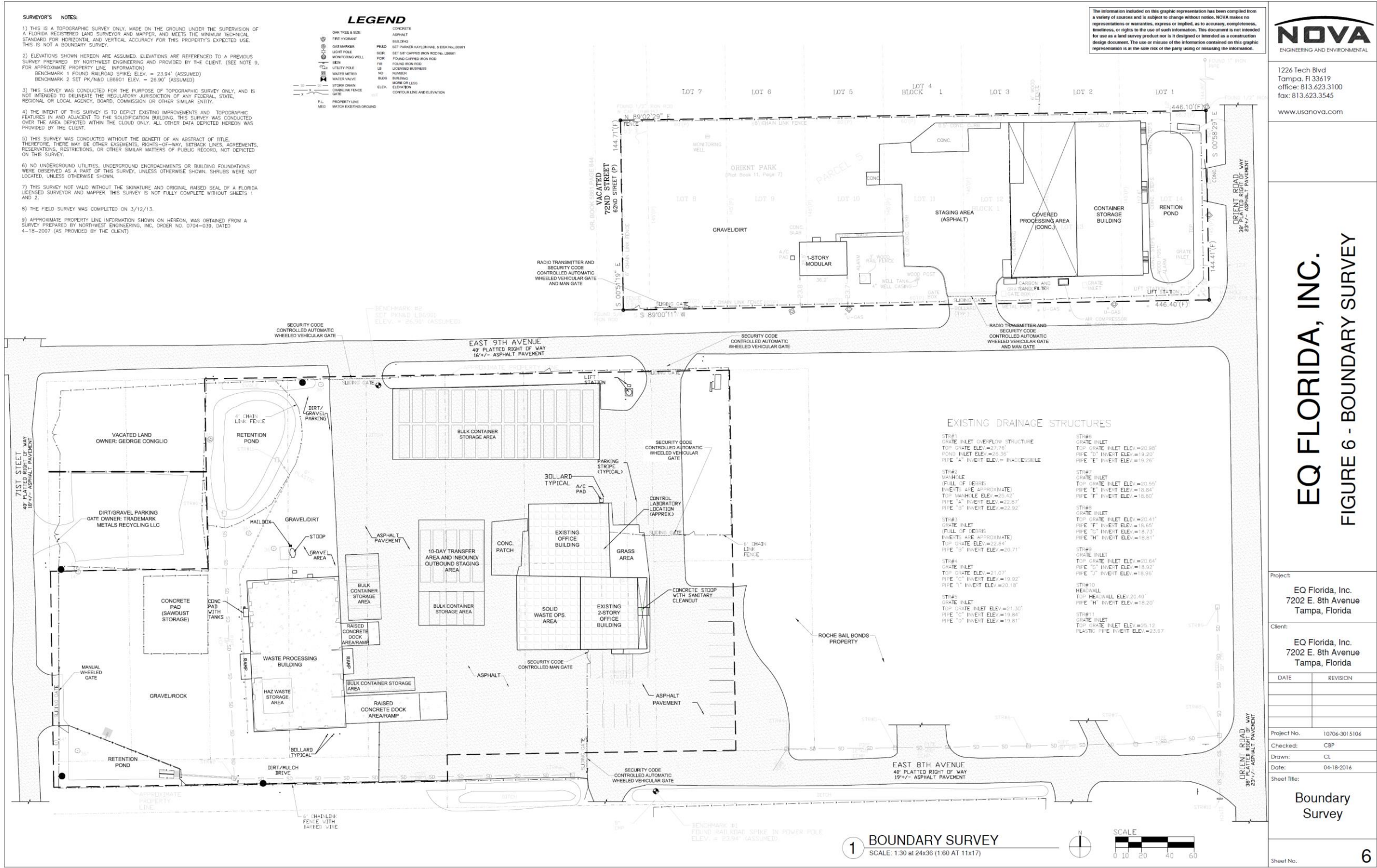
The report will be mailed (sent electronically to the FDEP) to the following parties, as necessary and/or appropriate:

Assistant Fire Chief Scott Ehlers Tampa Fire Department 808 East Zack Street Tampa, FL 33602	National Response Center (NRC) c/o U.S. Coast Guard (CG-5335) - Stop 7581 2100 2nd Street, SW Washington, DC 20593-0001
Director of District Management Florida DEP - Southwest District Division of Waste Management 13051 North Telecom Parkway Temple Terrace, FL 33637	Carrie Kruchell, PG Florida DEP Division of Waste Management 2600 Blair Stone Road M.S. 4560 Tallahassee, FL 32399-2400

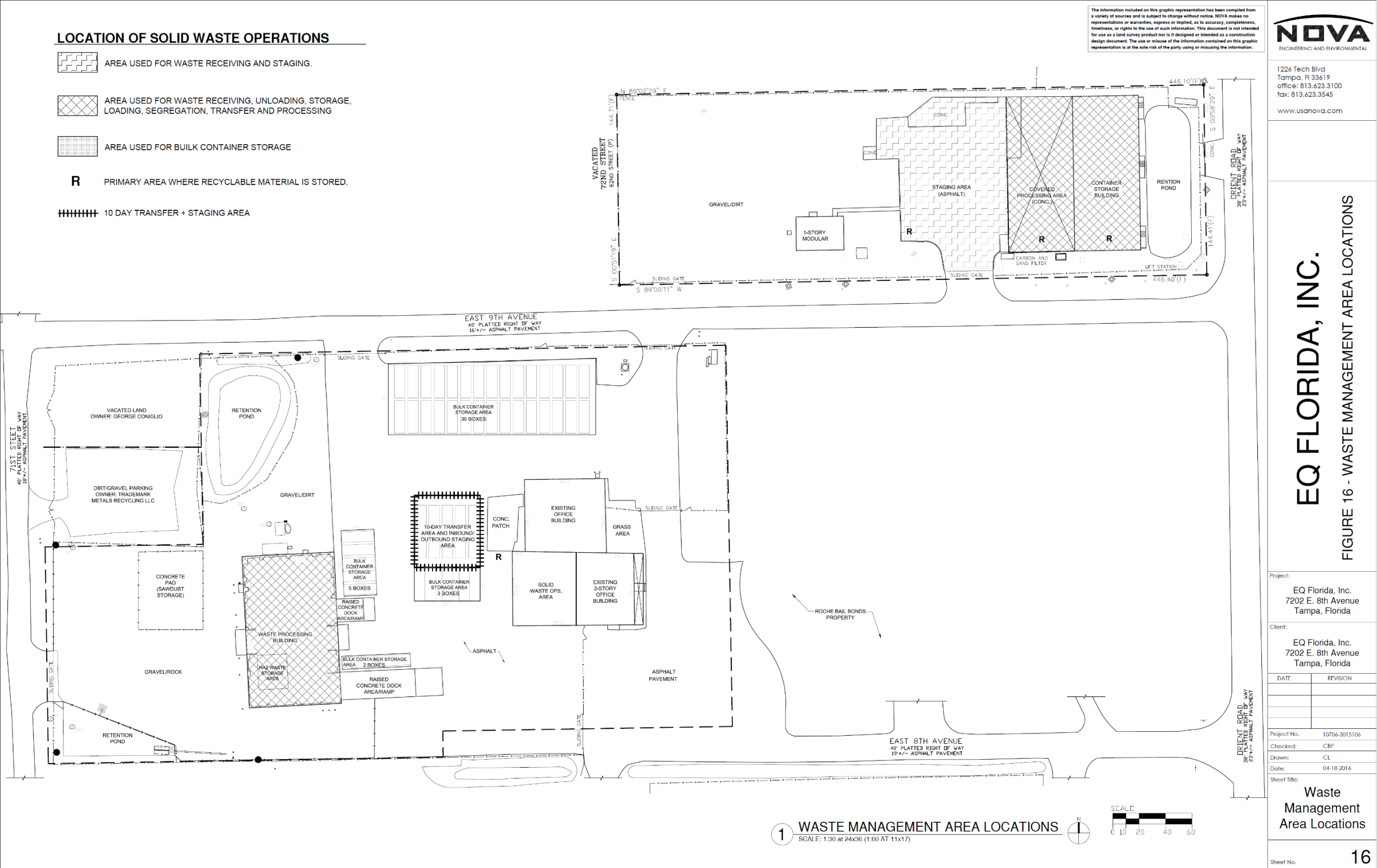


## ATTACHMENTS

Attachment 1 (Figure 6 – Boundary Survey)



Attachment 2 (Figure 16 – Waste Management Area Locations)



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**EQ FLORIDA, INC.**  
FIGURE 16 - WASTE MANAGEMENT AREA LOCATIONS

Project:  
EQ Florida, Inc.  
7202 E. 8th Avenue  
Tampa, Florida

Client:  
EQ Florida, Inc.  
7202 E. 8th Avenue  
Tampa, Florida

DATE	REVISION

Project No. 10706-3015106  
Checked: CBP  
Drawn: CL  
Date: 04-18-2016  
Sheet Title:  
**Waste Management Area Locations**

Sheet No. **16**

**1 WASTE MANAGEMENT AREA LOCATIONS**  
SCALE: 1:30 at 24x36 (1:50 AT 11x17)

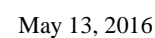
SCALE  
0 10 20 40 60



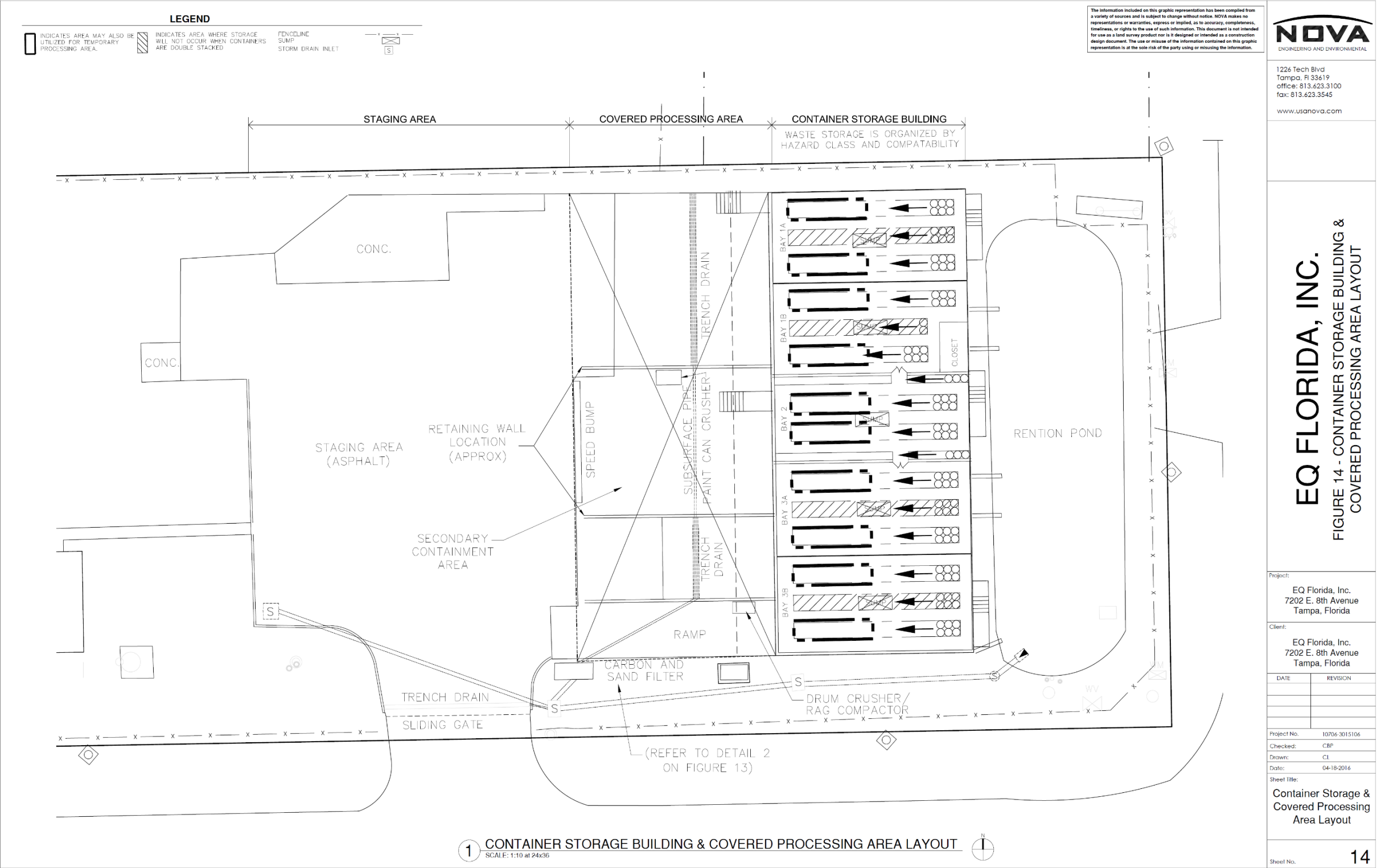
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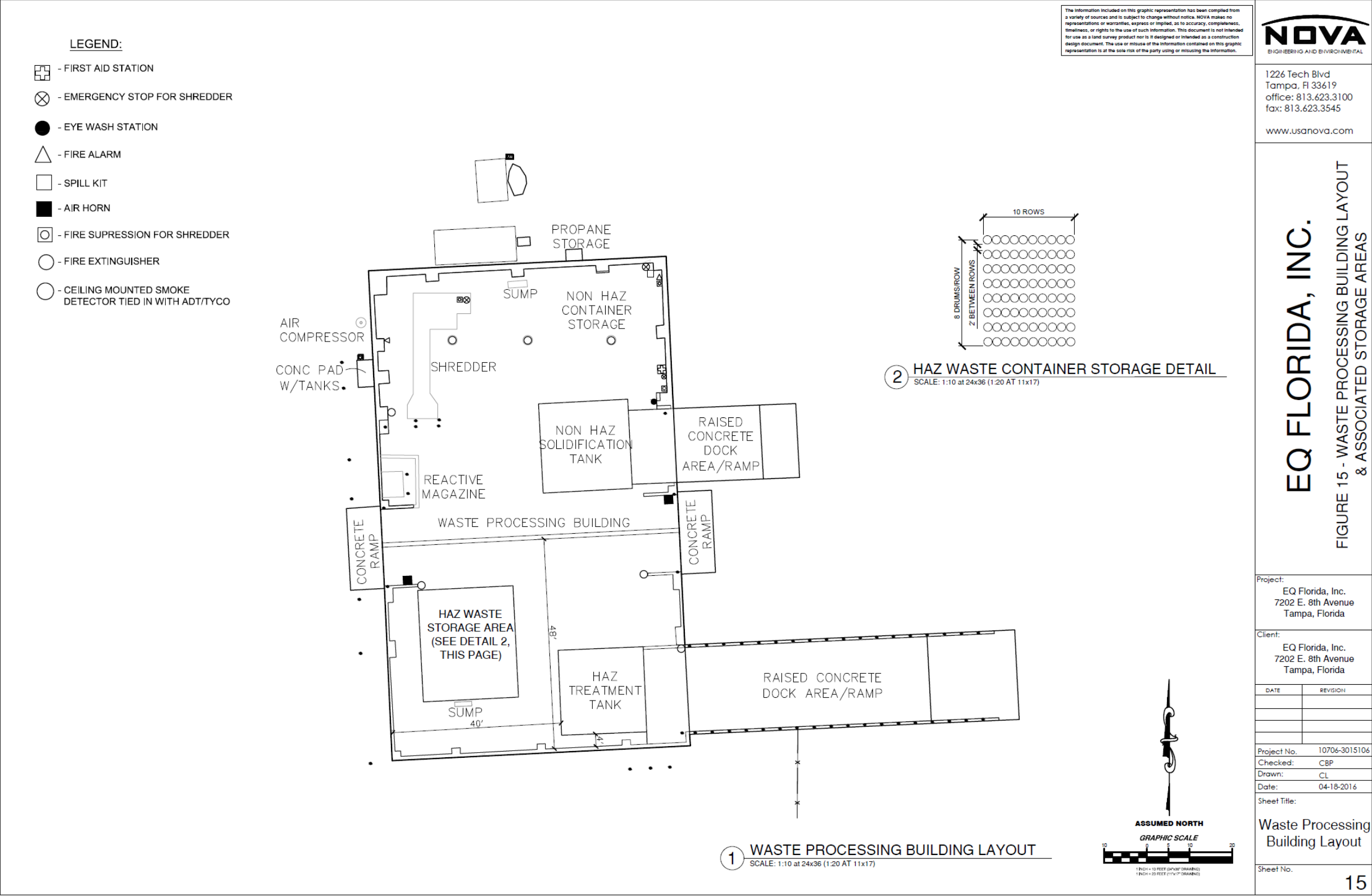
Sheet No. 13



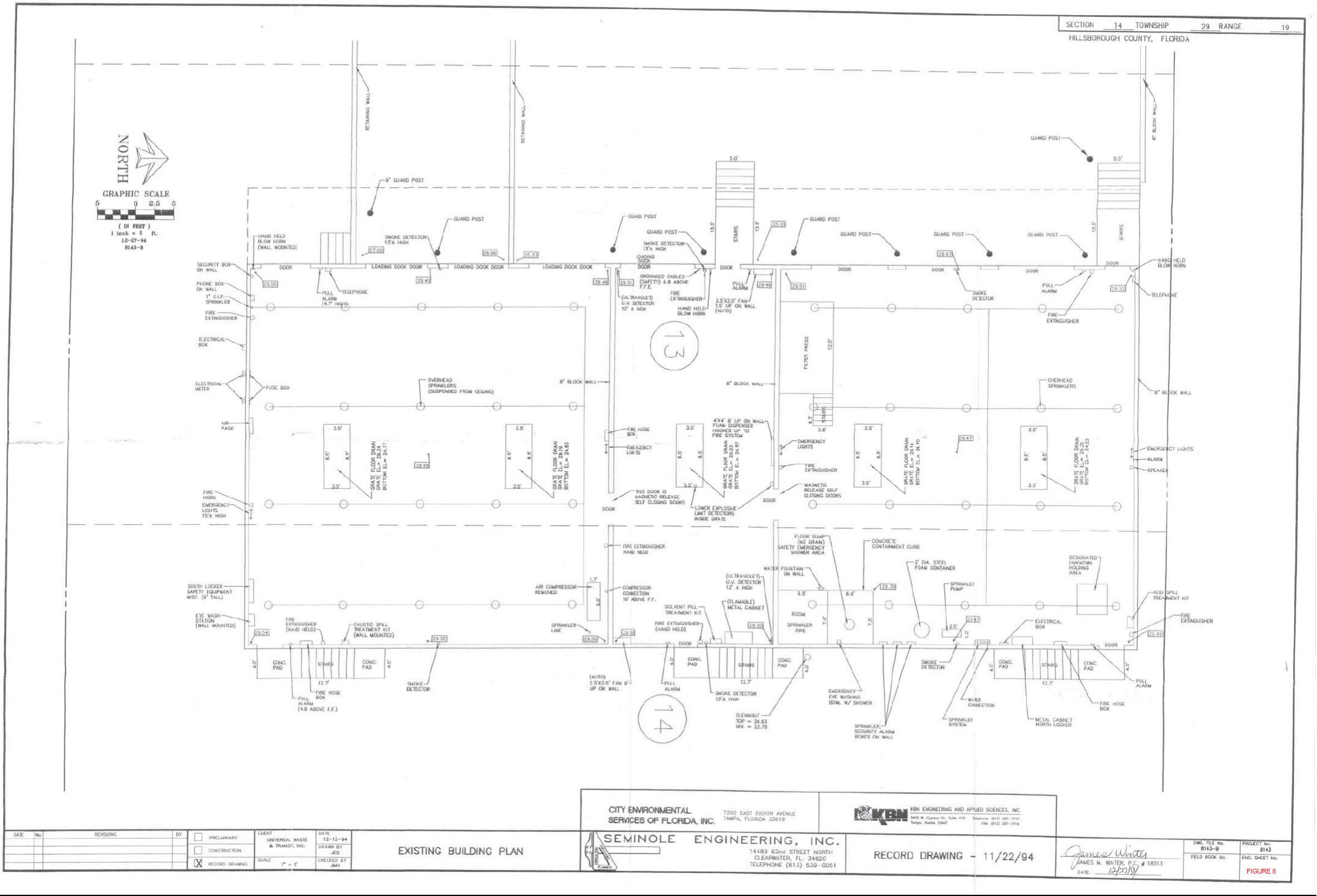
Attachment 4 (Figure 14 – Container Storage Building & Covered Processing Area Layout)



Attachment 5 (Figure 15 – Waste Processing Building Layout & Associated Storage Areas)

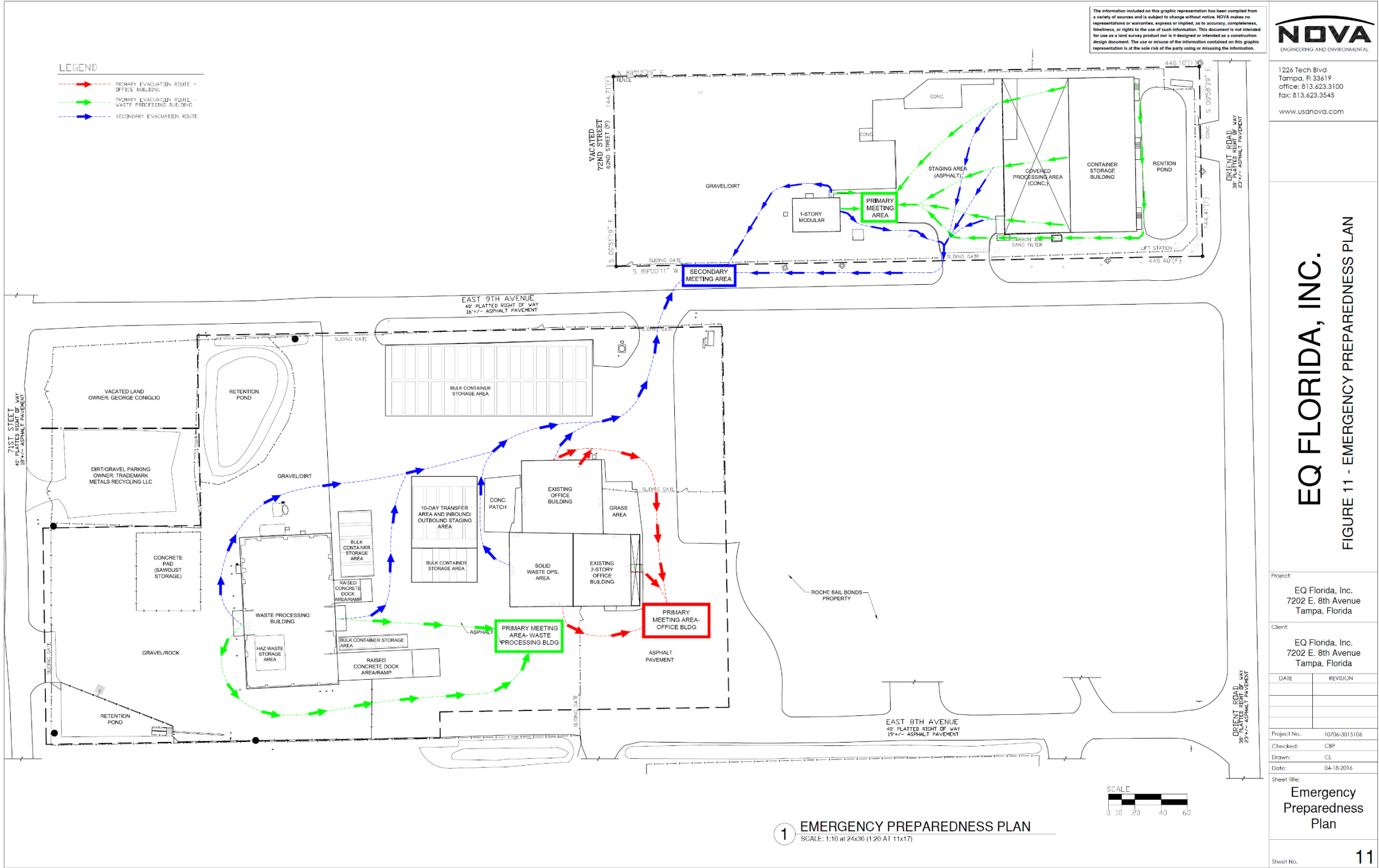


Attachment 6 (Figure 8 –Waste Management Building Safety & Fire Control Systems)





Attachment 7 (figure 11 – Emergency Preparedness Plan)



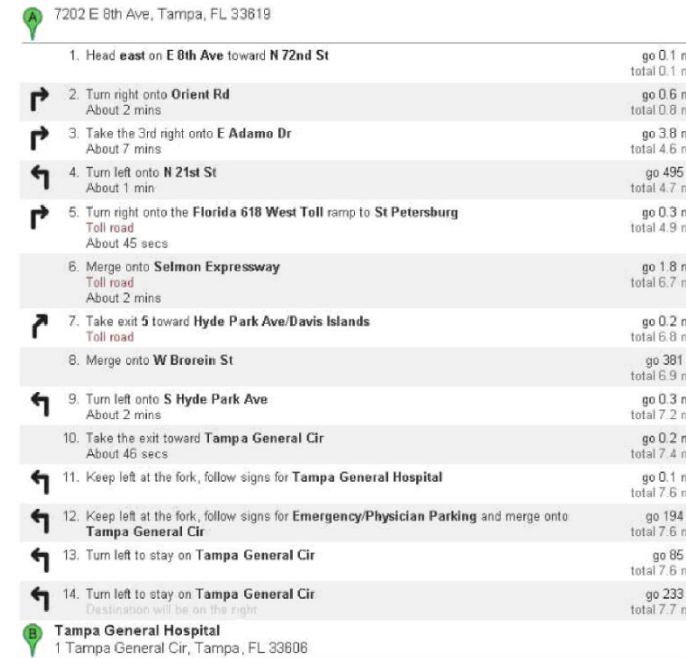


**ASSUMED NORTH**

**GRAPHIC SCALE**

0 1 2 3 4 5 6 7 8 9 10

1 INCH = 10 FEET (30.48 CM)  
1 INCH = 10 FEET (3.048 M)



# Emergency Action Plan

EQ Florida, Inc.



	7202 East 8 <sup>th</sup> Avenue
	Tampa, FL 33619
	813-624-5302
	Revised 5/13/16

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## **Section 1: Introduction**

### **1. Purpose**

The purpose of this Emergency Action Plan is to comply with the Occupational Safety and Health Administration (OSHA) Emergency Action Plan Standard, 29 CFR 1910.38, and to prepare employees for handling emergency situations. This plan is designed to minimize injury and loss of human life and company resources by training employees, procuring and maintaining necessary equipment, and assigning responsibilities. In the event of a major disaster, this Emergency Action Plan describes the initial actions to be taken until the appropriate responders take over.

This plan is intended to complement existing permit required plans such as Contingency Plans, Spill Prevention Countermeasure and Control (SPCC) Plans, etc. for training purposes and for quick reference in emergency situations. The facility-specific permit required plans shall take precedence when significant differences are found.

### **2. Scope**

This Emergency Action Plan applies to personnel at all EQ Florida, Inc. (EQ) offices and facilities.

### **3. General Information**

It is impossible to provide specific information for all situations. There is no guarantee implied by this plan that a perfect response to disaster emergency incidents will be practical or possible. Therefore, this plan is a guide for employees to familiarize themselves with basic emergency planning, response, and evaluation. Flexibility and common sense will guide good response actions.

### **4. Training**

EQ employees shall be trained on those parts of the plan that they must know to protect themselves in the event of an emergency. Additionally, the written plan shall be made available for employees to review and plan for their evacuation.

Training shall take place:

- a. Upon initial employment
- b. Annually
- c. With a change in job assignment
- d. In conjunction with the Management of Change procedure (MSP-MP-015-ALL) for new processes, equipment, etc.
- e. When the plan is revised.

Items to be reviewed during the training include, but are not limited to:

- a. Fire extinguisher locations, usage, and limitations.
- b. Threats, hazards, and protective actions.
- c. Means of reporting emergencies.
- d. Names of Emergency Coordinator / Alternates.
- e. Individual responsibilities.
- f. Alarm systems.

*The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.*

- g. Escape routes and procedures.
- h. Emergency shut-down procedures.
- i. Emergency Action Plan availability.

---

## **Section 2: Assignment of Responsibility**

### **1. EHS Manager**

The site EHS Manager shall maintain the Emergency Action Plan at each EQ location. The EHS Manager shall also ensure that all training records pertaining to this plan are maintained.

The EHS Manager is responsible for scheduling routine drills and tests and shall also coordinate with local public resources, such as police, fire, and emergency medical personnel, to ensure that they are prepared to respond as detailed in this plan.

### **2. Emergency Coordinators**

The Emergency Coordinators and their designated alternates are responsible for instituting the procedures in this plan during an emergency. EQ locations responsible for dispatching trucks may designate a separate DOT Emergency Coordinator for incidents involving EQ vehicles.

The Emergency Coordinator shall be thoroughly familiar with all aspects of this plan, all operations and activities conducted at the facility and/or the movement of EQ vehicles outside of the facility, the location and characteristics of hazardous materials, the locations of all records within the facility, and the facility layout.

Additionally, the Emergency Coordinator has the authority to commit the resources necessary to implement this plan and coordinates and directs all internal response efforts and personnel.

A list of Emergency Coordinators and alternates can be found in Appendix A.

### **3. Management**

EQ will provide adequate controls and equipment that, when used properly, will minimize or eliminate risk of injury to employees in the event of an emergency.

EQ management will ensure proper adherence to this plan through regular review.

### **4. Supervisors**

Supervisors shall follow, and ensure that their employees are trained in, the procedures described in this plan.

### **5. Employees**

Employees are responsible for following the procedures described in this plan.

### **6. Contractors**



Contract employees are responsible for complying with this plan, and shall be provided training on site-specific emergency procedures by their EQ Representative.

---

## **Section 3: Evacuation Plan**

### **1. Evacuation Routes and Assembly Areas**

A map of evacuation routes will be displayed in key areas and departments. Each map will show the way to an exit depending on where employees are located in the building. It is the responsibility of the department supervisors to inform employees of these evacuation routes. The EHS Manager shall verify that the maps are in place and current.

### **2. Evacuation Procedures**

Upon hearing the alarm or upon notification of an evacuation:

- a. Exit from buildings shall take place in an orderly and safe manner via the posted evacuation routes.
- b. Time permitting, ensure all windows and doors are closed upon exiting the building.
- c. If it is safe to do so, supervisors shall “sweep” their departments to ensure everyone has left the area.
- d. All employees, contractors, and visitors shall assemble at the closest designated Assembly Area (Rally Point).
- e. Anyone not at their usual work location, and contractors or visitors shall join the nearest group and proceed to exit and assemble at a designated Assembly Area.
- f. No one may leave the Assembly Area until the Emergency Coordinator has given the All-Clear signal.
- g. Department supervisors and/or Security personnel will conduct a head count and report any missing persons and their suspected locations if known to the Emergency Coordinator.
- h. Based on the situation, the Emergency Coordinator will decide whether to conduct search and rescue using internal personnel or wait for assistance from outside emergency responders.

---

## **Section 4: Employees with Disabilities**

Each person has different skills and abilities. In the event of an emergency, specific provisions must be made for individuals with disabilities. The employee with a disability is responsible for informing his/her supervisor that he/she will require assistance during an evacuation. It is important not to assume that persons with obvious disabilities need assistance, or to assume what type of assistance they may need.

Supervisors should discuss emergency procedures with individual employees who have obvious disabilities, those who have informed them of any special needs, and all newly hired disabled individuals. It must be determined what assistance they need and how best to communicate. This information may be recorded on a confidential list made available only to the person's immediate supervisor, the QEHS Manager, the site Operations Manager, and the Human Resources Department.

## Section 5: Responding to Emergencies

### 1. Incident Command System

The National Incident Management System (NIMS) is a consistent nationwide template that enables all governmental and non-governmental organizations to work together during domestic incidents. The NIMS requires that all agencies use the Incident Command System (ICS) when responding to incidents.

EQ utilizes the ICS to provide a common organizational structure for the immediate response to emergencies and involves the coordination of personnel and equipment on-site during an incident. The Emergency Coordinator serves as the Incident Commander, and depending on the size of the incident, may assign an Information Officer, Liaison Officer, and Safety Officer. Additional personnel, such as Emergency Response Team members, may be assigned to operations, planning, logistics, and administrative tasks during the incident.

Once the fire department arrives, the ICS provides a smooth transition of command from EQ to the fire department. The Fire Chief (or highest ranking fire personnel) becomes the Incident Commander but may retain the EQ Emergency Coordinator to serve in a command role under a Unified Command that may utilize EQ personnel to assist with the response.

### 2. Notification

All emergency situations will be reported immediately to the Emergency Coordinator.

To eliminate confusion and the possibility of false alarms, only the Emergency Coordinator can authorize personnel to contact the appropriate community emergency response agency. When notifying response agencies, the following information should be available:

- Name, address and telephone number of the owner and the incident reporter;
- Name, address, telephone number and EPA Identification Number (if applicable) of the facility;
- Time, location and type of incident (e.g., spill, fire, release, etc.);
- Name and quantity of material(s) involved and to what extent;
- The extent of injuries, if any;
- The possible hazards to human health and/or the environment outside of the facility; and
- The immediate response action taken.

The "Spill or Release Report and Notification Form" (QES-FM-133-ALL) found in Appendix D, should be used, and when completed will provide all the required information listed above.

The site Emergency Contact List (Appendix A) shall be posted in all Departments and key operational areas and contains all pertinent contact information including but not limited to:

- Emergency Coordinator and Alternates
- Police, Fire, EMS agencies
- Hospital / Clinic Information
- Local, State, Federal agencies (EPA, NRC, Health Department, POTW, etc.)

The Emergency Coordinator shall ensure that all employees are notified of an emergency situation as soon as possible. Notification may be accomplished by using an alarm system, telephones, or public address system.



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EQ Florida, Inc.**

The site Notification Flow Chart may be found in Appendix A. This flow chart includes the names and phone numbers of all employees and depicts the notification responsibility throughout the site.

### **3. Fire / Explosion Procedures**

Under no circumstances shall an employee attempt to fight a fire that has passed the incipient stage, nor shall any employee attempt to enter a burning building to conduct search and rescue. These actions shall be left to emergency services professionals who have the necessary training, equipment, and experience. Untrained individuals may endanger themselves and/or those they are trying to rescue.

In the event of a minor fire where portable extinguishers are appropriate, EQ personnel with current training in fire extinguisher use may attempt to contain the fire. Only small, easily controlled fires will be extinguished by EQ personnel. The Emergency Coordinator must be alerted in all cases. An Incident Report (QES-FM-001-ALL) must be completed and forwarded to the EHS Manager whenever a fire extinguisher is used.

In the event of a **FIRE**:

- a. Notify the Emergency Coordinator and adjacent employees.
- b. If the fire is still in the incipient stages, and you are trained to do so, attempt to extinguish the fire.
- c. If the fire is past the incipient stage, or attempts to extinguish an incipient fire fail, sound the alarm and evacuate.
- d. Supervisors will account for their personnel and will report this information to the Emergency Coordinator.
- e. Additional requirements may be found in the facility Contingency Plan (Appendix C).
- f. The locations of all fire extinguishers, evacuation routes, assembly areas, and alarm pull stations can be found on the site Emergency Preparedness Drawing located in Appendix B.
- g. See section 13 for reporting requirements.

### **4. Spill Procedures**

Whether a spill is considered minor or major must be determined on a case-by-case basis. The prime component is knowledge and understanding of the chemical, its hazards, and proper handling procedures. Other factors that play a role in this determination are the quantity released, ventilation considerations, confined space considerations, and personal protective equipment (PPE) availability.

Essentially, it must be determined; 1) what the circumstances are, 2) the capabilities of the personnel available, and 3) whether the spill is incidental or warrants an emergency response.

An Incident Report (QES-FM-001-ALL) must be completed and forwarded to the EHS Manager whenever a spill occurs.

#### Minor Spills:

EQ personnel can safely clean up the vast majority of chemical spills that occur. In the event of a spill, the individual(s) who caused the spill is responsible for prompt and proper clean up.

## Emergency Action Plan EQ Florida, Inc.

If the spill exceeds the employee's experience, training, equipment, or willingness to respond, the employee must follow the appropriate procedures to obtain assistance.

### In the event of a **MINOR SPILL OR LEAK**:

- a. Immediately alert area occupants and supervisor, and evacuate the area if necessary.
- b. Isolate the area so that nobody unknowingly walks into the contaminated area (close doors, barrier tape, post other individuals at doors or hallways to warn others, signs, cones, etc.)
- c. If a volatile, flammable material is spilled, control sources of ignition, and ventilate the area.
- d. Don PPE as appropriate to the hazards. Consult the Personal Protective Equipment Program (QES-PR-021-ALL) if more information is needed.
- e. Consider the need for respiratory protection. **Never enter a contaminated atmosphere without protection or use a respirator without training.** Consult the Respiratory Protection Program (QES-PR-031-ALL) if more information is needed.
- f. If possible, stop the spill/leak by closing valves or using compression plugs, blocking, bonding or patching materials. Large-sized containers may be used to overpack leaking containers or the contents of the leaking container may be transferred into another container. Be sure to properly label the containers used.
- g. Protect floor drains or other means for environmental release.
- h. Contain and clean up the spill.
  1. Absorbent material should be distributed over the entire spill area, working from the outside, circling to the inside. This reduces the chance for splash or spread of the spilled chemical.  
**NOTE:** Always assess the compatibility of the absorbent with the chemical spilled before using it (e.g., expanded silicate absorbents react with hydrofluoric acid, organic absorbents are incompatible with oxidizers, etc.)
  2. When spilled materials have been absorbed, use a broom or brush and scoop to place materials in an appropriate container. Polyethylene bags may be used for small spills. Pails or drums may be appropriate for larger quantities.
  3. In some cases it may also be acceptable to remove spilled liquids through the use of a vacuum unit or vacuum truck.
- i. Complete a waste label and affix onto the container. Arrange for proper storage and disposal of the waste.
- j. Decontaminate the surface where the spill occurred using a mild detergent and water, when appropriate.
- k. Replenish all spill response equipment and supplies.
- l. Additional requirements may be found in the facility Contingency and/or SPCC Plan (Appendix C).
- m. The locations of all evacuation routes, assembly areas, and spill kits can be found on the site Emergency Preparedness Drawing located in Appendix B.
- n. See section 13 for reporting requirements.

### Major Spills

A release is considered a major spill when it:

- Involves highly toxic, highly reactive, explosive, or life-threatening chemicals.
- Presents significant fire, explosion, or other physical or health risks, particularly if a person may be or has been significantly exposed, contaminated, or injured to such an extent that medical or other outside assistance is required.
- May adversely impact the external environment whether or not the spill occurred internal or external to a building.

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EQ Florida, Inc.**

In the event of a **MAJOR SPILL**:

- a. Notify the Emergency Coordinator and adjacent employees.
- b. Sound the alarm and evacuate.
- c. Supervisors will account for their personnel and will report this information to the Emergency Coordinator.
- d. Additional requirements may be found in the facility Contingency and/or SPCC Plan (Appendix C).
- e. The locations of all evacuation routes, assembly areas, and spill kits can be found on the site Emergency Preparedness Drawing located in Appendix B.
- f. See section 13 for reporting requirements.

## **5. Tornado**

Tornadoes are nature's most violent storms, and over a small area, the most destructive. A tornado's winds may reach 300 miles per hour or more. Generally short-lived and fast moving, they can level whole city blocks in a matter of seconds. The violent winds destroy buildings and hurl debris through the air, resulting in injury or loss of life and significant property damage. Other risks include fallen trees and power lines, ruptured gas lines, broken sewer and water mains, and possible fires. Damage or destruction of facilities and equipment at the site and the loss of vital records may result in significant economic loss and disruption of essential operations for a long period of time.

The National Weather Service is responsible for issuing weather warnings to the public. A tornado watch means that conditions are right for tornadoes to develop. A tornado warning means that a tornado has been sighted in the area.

Notification of a tornado watch or warning may be received by commercial radio and television or via the Internet.

After the all-clear is given, employees need to be aware of the following hazards that may exist:

- broken glass and other sharp objects
- downed electrical wires
- broken natural gas lines
- trip hazards
- partial power to equipment

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If a **TORNADO** warning is issued for the immediate area:

- a. Personnel shall follow evacuation procedures and seek protective shelter in the designated tornado shelter. The locations of all evacuation routes and designated tornado shelters can be found on the site Emergency Preparedness Drawing located in Appendix B.  
If the designated shelter cannot be reached in time, take cover in the lowest level of a building close by, ideally in an internal, windowless room.
- b. Supervisors will check their work areas, if it is safe to do so, before seeking shelter to ensure that all persons have received the warning notice and have gone to the shelter.
- c. Supervisors will account for their personnel at the tornado shelter and will report this information to the Emergency Coordinator.
- d. When the tornado warning is canceled or downgraded by the National Weather Service, the Emergency Coordinator will determine if continued weather monitoring is advisable and take the appropriate steps as necessary.
- e. Personnel shall remain in the tornado shelter until the Emergency Coordinator issues the "all clear" notice.
- f. If the site has received damage, the Emergency Coordinator will coordinate recovery efforts.

## **6. Blizzard**

Blizzards are the most perilous of winter storms, characterized by low temperatures, strong winds, and large amounts of snow. Most of the snow accompanying a blizzard is fine, powdery particles, which fall in such great quantities that at times visibility is only a few yards. Blizzard Warnings are issued when wind speeds of at least 35 mph are accompanied by considerable falling or blowing snow and temperatures of 20°F or lower are expected to prevail for an extended period of time.

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EQ Florida, Inc.**

In the event of a **BLIZZARD**:

1. If indoors:
  - a. Stay calm and await instructions from the Emergency Coordinator.
  - b. Stay indoors.
  - c. If there is no heat:
    - Close off unneeded rooms or areas.
    - Stuff towels or rags in cracks under doors.
    - Cover windows at night.
  - d. Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
  - g. Wear layers of loose-fitting, lightweight, warm clothing if available.
2. If outdoors:
  - a. Find a dry shelter. Cover all exposed parts of the body.
  - b. If stranded in a vehicle:
    - Stay in the car or truck.
    - Run the motor about 10 minutes each hour. Open the window a little for fresh air. Make sure the exhaust pipe is not blocked.
    - Make yourself visible to rescuers.
    - Exercise to keep blood circulating and to keep warm.
3. In all cases:
  - a. Supervisors will account for their personnel and will report this information to the Emergency Coordinator.
  - b. When the blizzard is downgraded by the National Weather Service, the Emergency Coordinator will determine if continued weather monitoring is advisable and take the appropriate steps as necessary.
  - c. Personnel shall remain indoors at the site until the Emergency Coordinator issues the "all clear" notice.
  - d. If the site has received damage, the Emergency Coordinator will coordinate recovery efforts.

## **7. Hurricane**

A hurricane is a tropical cyclone with sustained surface winds (1-minute mean) of 63 knots (73 mph) or greater.

The National Weather Service is responsible for issuing weather warnings to the public. A hurricane warning is notification that within 24 hours or less an area may be subject to hurricane-force winds. A hurricane watch is notification of a possible hurricane threat to a community, within a 36 hour time period.

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If a **HURRICANE WATCH** is issued for the immediate area:

- a. Follow internal notification procedures for employees. Begin communication with appropriate EQ Corporate departments and all scheduled/expected visitors, contractors, trucking companies, etc.
- b. Verify emergency equipment inventory and supplies to ensure adequate quantities of rope, plywood, masking tape, flashlights, batteries, etc.
- c. Any loose equipment shall be moved inside or secured (lashed down).
- d. A small amount of canned food and drinking water should be purchased and stored in case employees get stranded at the facility during or after the hurricane.

If a **HURRICANE WARNING** is issued for the immediate area:

- a. Make ready all portable generators, air compressors and portable radios.
- b. Move desks, files, office equipment, and furniture away from uncovered windows.
- c. Computers, copiers, and fax machines should be moved to a safe location. Make sure they are marked with names and departments.
- d. Board up or tape all windows.
- e. Secure all electrical power sources not required for minimum operation. Electrical equipment should be turned off and unplugged; lights should be turned off except for areas that might be manned.
- f. All non-essential personnel shall be evacuated from the site.
- g. All remaining employees should prepare to ride out the storm. Employees required to be on site must remain indoors. Ensure adequate emergency supplies. Monitor the weather information.

**Post HURRICANE Operations:**

The Emergency Coordinator will:

- a. Re-staff entrances to keep out vandals and sightseers.
- b. Survey for damage or injured personnel. Assist any injured as necessary.
- c. Prioritize clean up and repairs.

Additional requirements may be found in the facility Plan (Appendix C).

## **8. Earthquake**

An earthquake usually occurs without any type of warning. They may occur once or have several after shocks. Depending on the strength, earthquakes may cause buildings, soil, or other structures to be unstable or unsound.

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In the event of an **EARTHQUAKE**, if you are:

Indoors:

- a. Do not run blindly outside.
- b. Get under a desk, table, or supported doorway.
- c. Stay away from glass windows, shelves, & heavy equipment. Avoid power lines as they may be live.

Outdoors:

- a. Do not run blindly inside.
- b. Stay in the open.
- c. Beware of fires, downed utility lines, and aftershocks.

Driving:

- a. Pull to the side of the road and stop.
- b. Avoid utility lines or other objects that may fall.
- c. Set brakes and turn-off the ignition.
- d. Stay in the vehicle until the earthquake is over.

After the earthquake has stopped:

- a. Stay calm and await instructions from the Emergency Coordinator.
- b. Supervisors will account for their personnel and will report this information to the Emergency Coordinator.
- c. Keep away from overturned equipment, windows, filing cabinets, and electrical power.
- d. Check for injuries and provide assistance as needed.
- e. Emergency Coordinator should check for fires and shut off utilities to control gas and water leaks.
- f. If major structural damage has occurred, the Emergency Coordinator shall order a complete evacuation. The building should be inspected by a Professional Engineer (PE) for damage before reentry.

## **9. Flood**

A flood can be the result of heavy rain, plumbing problems, faulty sprinkler systems, etc.

In the event of a **FLOOD**:

- a. Be ready to evacuate as directed by the Emergency Coordinator.
- b. Time permitting, move vital material and equipment to higher ground.
- c. Do not enter any flooded area.
- d. Supervisors will account for their personnel and will report this information to the Emergency Coordinator.

## **10. Utility Emergency**

### Natural Gas Leak:

Natural gas is an invisible gas consisting mainly of methane. It is extremely flammable and potentially explosive. Its explosive limit ranges from 4 to 15% in air. The vapor density of natural gas is 0.6 relative to air i.e., it is lighter than air. The smell of natural gas comes from isopropyl mercaptan, a chemical that is added to give natural gas a distinctive foul smelling odor. On the average, individuals are able to detect the smell of natural gas at a concentration of 0.2% in air.

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**In the event of a *GAS LEAK*:**

- a. Inform the Emergency Coordinator. If a major leak is involved, they will call 911 for assistance.
- b. Turn off gas if location of valve is known and it is safe to do so.
- c. Do not turn electric switches on or off.
- d. Do not use the telephone in the area of the leak - go to another area.
- e. Do not attempt to locate a leak by using a match or lighter.
- e. Ventilate the area by opening windows where possible.
- f. If leak is significant (strong or intensifying) evacuate area and keep people out.
- g. Supervisors will account for their personnel and will report this information to the Emergency Coordinator.

**Power Failure:**

Electrical failures may occur periodically for a variety of reasons. It is important for each EQ location to establish procedures and train employees to accomplish critical tasks manually if possible.

**In the event of a *POWER FAILURE*:**

- a. Inform the Emergency Coordinator.
- b. If it is safe to do so, turn off any equipment that may start unexpectedly once power is restored. If equipment cannot be deactivated, it may be necessary for the Emergency Coordinator to post someone near the equipment until power is restored.
  - Follow site Preventative Maintenance / Malfunction Abatement plans for air pollution control devices.
  - Laboratories shall follow the procedures outlined in the Chemical Hygiene Plan (QES-PR-025-ALL) where appropriate.
- c. If you are in an unlighted area, proceed cautiously to an area that has lighting. Provide assistance to others in your area that may be unfamiliar with the space.
- d. Supervisors will account for their personnel and will report this information to the Emergency Coordinator.

## **11. Train Derailment**

According to the U.S. Department of Transportation, about 4,300 shipments of hazardous materials travel each day by rail; most of these materials safely reach their destinations. These hazardous materials include chemicals and related products and petroleum products, many of which are corrosive, explosive, flammable, or toxic. They can be extremely dangerous when improperly released.



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In the event of a ***TRAIN DERAILMENT***:

If the derailment occurs on site:

- a. Inform the Emergency Coordinator.
- b. Notify the rail company. (Rail contact information is listed in Appendix A.)
- c. Follow procedures listed above for fire or spill as necessary.

If the derailment occurs off site:

- a. Follow directions given by the community Incident Commander (usually fire or police department) for evacuating the facility or sheltering-in-place.

## **12. Department of Transportation (DOT) Emergencies**

Emergencies involving EQ trucks and drivers may happen while in transit, at a customer location or at an EQ facility.

Notification:

All emergency situations will be reported to the DOT Emergency Coordinator. The driver must provide the following information when reporting an emergency:

- Driver's name
- Location
- Material being transported
- Estimated quantity spilled
- Conditions at the scene and any actions taken
- Injuries or other resulting damage

An Incident Report (QES-FM-001-ALL) must be completed and forwarded to the EHS Manager once the emergency has been resolved.

In the event of an ***TRUCK EMERGENCY*** while at a customer site or EQ facility:

- a. Notify customer or facility contact person.
- b. Notify the DOT Emergency Coordinator.
- c. Follow directions given.

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In the event of an in-transit **TRUCK FIRE**:

- a. If the fire is still in the incipient stages, and you are trained to do so, attempt to extinguish the fire.
- b. If the fire is past the incipient stage, or attempts to extinguish an incipient fire fail, evacuate to a safe distance. If you can do so safely, locate the shipping paperwork and Emergency Response Guidebook (ERG) and take them with you. **Call 911 (or local emergency number).**
- c. If possible, use traffic cones, triangles, or other means to prevent other vehicles, pedestrians or on-lookers from entering the area.
- d. Inform the DOT Emergency Coordinator. You may be directed at this time to call 911 or the local emergency number if you haven't already (see step b).
- e. See Section 13 for additional reporting requirements.
- d. Other requirements may vary by state. Consult the Transportation Contingency Plan located in Appendix C.

In the event of an in-transit **SPILL** or **LEAK** from a **TRUCK**:

- a. Inform the DOT Emergency Coordinator. You may be directed at this time to call 911 or the local emergency number.
- b. If a volatile, flammable material is spilled, control sources of ignition.
- c. Use traffic cones, triangles, or other means to prevent other vehicles, pedestrians or on-lookers from entering the area.
- d. Don PPE as appropriate to the hazards. Consult the Personal Protective Equipment Program (QES-PR-021-ALL) if more information is needed.
- e. Consider the need for respiratory protection. **Never enter a contaminated atmosphere without protection or use a respirator without training.** Consult the Respiratory Protection Program (QES-PR-031-ALL) if more information is needed.
- f. If possible, stop the spill/leak by closing valves or using plugs, blocking, bonding or patching materials. Large-sized containers may be used to overpack leaking containers. Be sure to properly label the containers used.
- g. If possible, contain and then clean up the spill using the absorbent material from the truck spill kit.
- h. If the spill is too large to be contained by absorbent material, use dirt or other available resources to construct the temporary barrier. Every attempt should be made to keep the spill from spreading.
- i. See Section 13 for additional reporting requirements.
- j. Other requirements may vary by state. Consult the Transportation Contingency Plan located in Appendix C.

In the event of an **ACCIDENT** involving an EQ **TRUCK** while in transit:

- a. If there is more than one party or vehicle involved in the accident, call 911 or the local emergency number first then notify the DOT Emergency Coordinator.
- b. If the accident only involves you and your truck, notify the DOT Emergency Coordinator. You may be directed at this time to call 911.
- c. Use traffic cones, triangles, or other means to prevent other vehicles, pedestrians or on-lookers from entering the area.
- d. Follow procedures listed above for fire or spill as necessary.
- e. Collect contact and insurance information from all those involved in the accident. Collect contact information from any witnesses.
- f. See Section 13 for additional reporting requirements.
- g. Other requirements may vary by state. Consult the Transportation Contingency Plan located in Appendix C.

### 13. Airplane Crash

EQ has operations within or in close proximity to several airports.

In the event of an **AIRPLANE CRASH**:

- a. Inform the Emergency Coordinator.
- b. Follow procedures listed above for fire as necessary.

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## Section 6: Medical Emergencies

### 1. General Information

Medical problems can run the gamut from relatively minor, isolated events to the significant events involving many people that might accompany a major disaster. An Incident Report (QES-FM-001-ALL) must be completed and forwarded to the EHS Manager whenever an illness or injury occurs.

### 2. First Aid

All EQ facilities and jobsites are equipped with first aid kits for performing minor first aid (locations are provided on the Emergency Preparedness Drawing in Appendix B). In addition, facility-specific procedures may be written for exposure to chemicals likely to be on site (e.g., Hydrofluoric Acid.) EQ employees are authorized to render the minimum first aid necessary within their training until help arrives.

### 3. Automated External Defibrillator (AED)

Some EQ facilities are equipped with Automated External Defibrillators (AED) for use in the event of a sudden cardiac arrest. EQ provides training in the use of the AED device. It is preferable that the rescuer be trained in order to understand the role of defibrillation in the broader context of the cardiac chain of survival. Training in CPR and AED skills will enable the rescuer to use all the steps in the cardiac chain of survival, thereby significantly increasing the victim's chance of survival. However, all 50 states now have AED Good Samaritan provisions that help protect laypersons.

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In the event of a serious **MEDICAL EMERGENCY**:

- a. Call 911 or the local emergency number first then notify the Emergency Coordinator.
  - You may have someone make these calls for you. If someone else calls, have the person report back to you for verification that the calls were made.
  - Be prepared to give as much information as possible – type of emergency, what help is needed, exact address, telephone number, and victim information.
  - Don't hang up until you are told to do so by the dispatcher.
- b. Do not attempt to move the victim unless they are in imminent danger of further injury.
- c. Provide first aid until emergency personnel arrives if you have the appropriate training and equipment. Always wear PPE when coming into contact with blood, vomit, or other bodily fluids.
- d. If possible, send someone to escort emergency responders to the appropriate location.

In the event of employee **CONTAMINATION**:

- a. Call 911 or the local emergency number then notify the Emergency Coordinator.
- b. Protect the responder with the proper PPE and clothing.
- c. Remove the victim well away from the contamination area.
- d. Remove all contaminated clothing and decontaminate the victim.
- e. Administer appropriate first aid if required and you are trained to do so. Treat the victim to prevent or reduce shock, and provide comfort and reassurance to the victim.
- f. Check waste approvals and/or Material Safety Data Sheets (MSDS's) for additional chemical and first aid information.
- g. Once the chemical contaminated victim is stable and safe, begin spill control procedures to appropriately deal with the event which initially caused the employee chemical contamination.
- h. Send MSDS's or chemical information to the hospital along with the patient.

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## Section 7: Threats of Violence

### 1. General Information

This section deals with specific emergency procedures for different types of workplace violence. Please consult the Human Resources Department and/or Employee Manual for EQ's policy on workplace violence, prevention, and employee assistance / crisis management.

### 2. Types of Workplace Violence

**Third Party Intrusion Into the Workplace:** Estranged or recently divorced husbands, ex-boyfriends or emotionally disturbed persons.

**Disgruntled Employees:** Usually direct their act(s) of violence towards coworkers, supervisors or managers. The motive for their action is usually revenge. They believe something very important has been taken away from them. Such as: a promotion, a raise, an assignment, etc.

**Random Violence:** Robbery or Terrorism

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#### 4. Crime

In the event of a **CRIME**:

If the crime or criminal behavior is in progress:

- a. DO NOT approach or attempt to apprehend the persons involved. Take only actions necessary for self-defense. If you are safe, stay where you are until help arrives. Otherwise, try to move to a safe location.
- b. Call 911 or the local emergency number first then notify the Emergency Coordinator.
- c. Provide as much information as you can, including:
  - Type of crime or criminal behavior
  - Location of crime or criminal behavior
  - Description of persons (height, weight, sex, clothing) and of any weapons involved
  - Direction of anyone's travel away from the scene
  - Vehicle description (color, year, make, model, license plate number)

To report crimes no longer in progress:

- a. Notify Plant Management
- b. Call local Police Department

#### 4. Workplace Violence

Your actions may help calm a potentially violent situation, or they may escalate the problem. Try to behave in a manner that helps calm the situation.

In the event of a **WORKPLACE VIOLENCE** situation:

- a. Take implied threats seriously, avoid confrontation.
- b. Call 911 or the local emergency number first then notify the Emergency Coordinator
- c. Remain calm.
- d. Try to notify other staff without being obvious
- e. Do not make sudden moves or show excitement in your voice. Be patient and calm. Discussing the cause of the hostility may allow you to diffuse the situation or provide you the opportunity to escape

#### 5. Suspicious Mail & Objects

Suspicious packages are not limited to those delivered by a commercial or U.S. postal carrier. Any of the following characteristics have been designated by the U.S. Post Office and the Department of Alcohol, Tobacco, and Firearms as indicators of suspicious packages:

- Lumps, bulges, or protrusions on package
- A lopsided or heavy-sided package or excessive masking tape
- Handwritten addresses or labels from companies (check to see if the company exists and if they sent a package or letter)
- Packages wrapped in string
- Excess postage on small packages or letters
- No postage or un-canceled postage

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- Handwritten notes, such as, "To Be Opened in the Privacy of," "Confidential," "Your Lucky Day Is Here," "Prize Enclosed"
- Restrictive markings such as "confidential" or "personal"
- Improper spelling of common names, places, or titles
- Generic or incorrect titles. Titles with no name attached
- Leaks, stains, or protruding wires, string, tape, etc.
- Hand delivered or "dropped off for a friend" packages or letters
- No return address or a pretend return address
- Foreign mail, air mail, and special-delivery packages
- Any letter or packages arriving before or after a phone call from an unknown person asking if the item was received

In the event that **SUSPICIOUS MAIL** or **SUSPICIOUS OBJECT** is received:

- a. Do not touch it, tamper with it, or move it.
- b. Move people away from the suspicious object. Avoid contaminating other areas and people. Do not move or attempt to open the package. Do not investigate too closely. Do not cover or insulate the package.
- c. Call 911 or the local emergency number first then notify the Emergency Coordinator. Be prepared to describe the item, its location, and anything you may have observed.
- d. Follow Police instructions. If you are told to evacuate the area or building, follow the facility evacuation procedures.

## **Bomb Threat**

A bomb threat may come to the attention of the receiver in various ways. It is important to compile as much information as possible.

In the case of a written threat, it is vital that the document be handled by as few people as possible as this is evidence that should be turned over to the local Police Department. If the threat should come via e-mail, make sure to save the information on your computer. Most bomb threats are transmitted over the telephone; thus, the following instructions will be provided with that assumption.

In the event of a **BOMB THREAT**:

- a. Remain calm.
- b. Listen carefully. Be polite and show interest. Try to keep the caller talking so that you can gather more information.
- c. Use the "Bomb Threat Checklist" located in Appendix E to question the caller in a polite manner. Use any means to prolong the conversation. This will provide a better chance to identify the voice and hopefully obtain additional information about a device, the validity of the threat, or the identity of the caller.
- d. Upon completion of the call, immediately call 911 or the local emergency number then notify the Emergency Coordinator.
- e. Follow Police instructions. If you are told to evacuate the area or building, follow the facility evacuation procedures.

## 7. Civil Disorder

Demonstrations, riots, looting and other forms of civil disturbance can threaten the site operation and the safety of persons at the site. Property damage resulting from civil disturbance is often extensive and costly, both in terms of dollars and in diminished operating ability.

Because it is difficult to develop an effective response to these types of situations due to the varying circumstances involved, very general procedures follow.

In the event of **CIVIL DISORDER**:

- a. At the first sign of a civil disturbance/protest, notify the Emergency Coordinator and/or facility management.
- b. The Emergency Coordinator or his/her designee will notify the Police Department and wait for instructions.

## Section 8: Emergency Shut Down of Operations

### 1. General Information

For some facilities, emergency shutdown operations require special care beyond normal operational procedures. Process shutdown often involves numerous simultaneous activities and rapidly changing process conditions. Normally automated systems or process controls may be bypassed, disconnected, or under manual control. Of particular concern are the hazards associated with the additional human/process interactions required during shutdown operations, as process parameters may be in unusual ranges and operators may have less experience controlling plant conditions during a shutdown.

Chemical releases during process shutdown operations must be minimized; and if reportable releases occur, they must be reported immediately upon constructive knowledge of the occurrence.

### 2. Employees Remaining to Shut Down Operations Before Evacuating

Each facility should review their operation and determine whether total and immediate evacuation is possible for various types of emergencies. The preferred approach is immediate evacuation of all employees when the evacuation alarm is sounded.

However, certain equipment and processes should be shut down in stages or over time. In other instances it is not possible or practical for equipment or certain process to be shut down under certain emergency situations. Some facilities may require designated employees remain behind briefly to operate fire extinguishers or shut down gas and/or electrical systems and other special equipment that could be damaged if left operating or create additional hazards to emergency responders, or cause a release of hazardous materials.

If any employees will stay behind, an emergency shutdown plan must be developed and should describe in detail the procedures to be followed by these employees. The "Emergency Shut Down Checklist" (QES-FM-138-ALL) may be found in Appendix E to assist with development of this plan.

All employees remaining behind should be capable of recognizing when to abandon the operation or task and evacuate before their egress path is blocked. The plan should include locations

where utilities (such as electrical and gas) can be shut down for all or part of the facility either by EQ employees or by emergency response personnel.

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## **Section 9: Communications**

### **1. General Information**

Communicating effective alerts and warnings allows people to take actions that save lives, reduce damage and human suffering, and speed recovery. Rapid reporting about what is happening during a major emergency can also be very effective in protecting people, reducing damage, and improving response. EQ facilities must be capable of warning those at risk in a timely manner.

While many informal channels are used to communicate business related information every day, widespread emergency communication depends on disseminating alerts, warnings and follow-up information through as many channels as possible, very rapidly.

Each EQ location must determine the following:

- How the facility intends to receive and pass on both emergency alert and follow-up instructions/information to its employees during the normal business day.
- How the facility intends to make employees who work after the normal EQ business day aware of emergencies or critical issues.
- How the facility intends to make key employees aware of an emergency affecting their operations when they are away from the facility.

### **2. Alarms and Communications Equipment**

Each EQ facility employs different methods to alert personnel in the event of an emergency. Some facilities have alarm systems for the entire site; others have alarms only for critical processes. Some facilities / departments, due to size and type of operation, rely on manual systems for notification. Manual systems include: overhead paging / intercom, portable radio, telephone, cellular phone, etc.

Each facility must identify the method(s) used and ensure that all personnel are trained both in how to sound the alarm and what to do if they hear an alarm.

### **3. Call Trees**

The establishment of a call tree — i.e., a list that defines who is responsible for calling whom in the event of a disaster — makes contacting personnel significantly easier. The call tree must be updated following any change in organization, location or employee contact information. The call tree will be tested during testing of the Emergency Action Plan.

### **4. Communicating with Media**

All inquiries by the media and/or other outside groups regarding an emergency event shall be directed to the EQ Marketing & Communications Manager.



## Section 10: Resources

### 1. Emergency Response Teams (ERT)

The primary responsibility of facility Emergency Response Teams formed by this Plan is to provide for the safe and efficient evacuation of all personnel during an emergency situation. The secondary responsibility is to assist in mitigating the emergency if it is within their training and capabilities.

Site ERTs should consist of personnel from all departments, but especially from maintenance and critical operational areas. The ERT will report to the Emergency Coordinator during the emergency event.

### 2. Planning & Practice

Planning is an ongoing effort, and plans and associated documents should never be regarded as final or complete. They must be evaluated and updated on a regular basis.

Practice is an essential component of emergency preparedness. It is impossible to prepare adequately for an emergency without it. Each facility shall hold emergency drills regularly, varying the types of drills, as is appropriate to the operation. Each drill should be conducted as seriously as an actual emergency. Practice provides the opportunity to determine what works and what does not.

### 3. Coordination with Public Authorities

Coordination with public authorities is a critical component of emergency planning. Public authorities may include fire, police, city, county, state or national emergency management teams, National Guard, public utilities, State Emergency Response Committee (SERC), Local Emergency Planning Committee (LEPC), and state and federal environmental agencies.

It is essential to know the local and regional public authorities who support each EQ facility and understand their response procedures. The EHS Manager at each facility, with support from facility management, will coordinate emergency planning activities with the applicable response agencies.

Every effort shall be made to familiarize first responders with EQ facilities and to share critical information (i.e. site layout information, floor plans, location and quantities of hazardous materials, etc.) Site tours and opportunities to conduct joint emergency drills shall be made available.

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## Section 11: Post Emergency Evaluation

Following the conclusion of any significant emergency event or exercise, the facility must conduct a post-incident or exercise review. Such reviews shall be conducted in the form of a meeting or by requesting written inputs from participating departments or agencies regarding problems observed and recommendations for improvements in the plan, procedure, or training.

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## Section 12: Reporting

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The flowcharts found in Appendix D illustrate the general requirements for incident reporting. State and local requirements may differ greatly. The “Spill or Release Report and Notification Form” (QES-FM-133-ALL) also found in Appendix D should be used when reporting to ensure all criteria are met.

The EQ Incident Report (QES-FM-001-ALL) is required to be completed for all incidents.

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## **Section 13: Definitions**

**All Clear:** When an emergency situation is over, the Emergency Coordinator authorizes employees to return to normal work activities.

**Assembly Area:** A predetermined location in which to assemble and conduct a roll call or head count during an emergency. Also may be called a “rally point.”

**Automated External Defibrillator (AED):** An automatic computerized medical device programmed to analyze heart rhythms, recognize rhythms that require defibrillation, and provide visual and voice instructions for the device operator, including, if indicated, to push the button to deliver an electric shock.

**Cardiopulmonary Resuscitation (CPR):** Rescue breathing and external cardiac compression applied to a victim in respiratory arrest or sudden cardiac arrest.

**Emergency:** Any unplanned event that affects the safety or security of persons in or near the facility, causes damage or destruction to the facility or equipment, or disrupts the normal facility operation.

**Emergency Coordinator:** The designated EQ representative in charge during an incident, or the ranking emergency response officer on the scene.

**Emergency Contact List:** An approved list of individuals appointed to be designated coordinators of emergency response activities. The list will also contain contact information for the EQ Communications Manager as well as relevant governmental agencies and public services (i.e. police, fire, EPA, DOT, etc.)

**Emergency Response:** A response effort by employees from outside the immediate response area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance. Responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel are not considered to be emergency responses. Responses to releases of hazardous substances where there is no potential safety or health hazard (i.e., fire, explosion, or chemical exposure) are not considered to be emergency responses.

**Environmental Protection Agency (EPA):** An agency of the federal government of the United States charged with protecting human health and with safeguarding the natural environment: air, water, and land.

**EQ Representative:** An authorized EQ employee responsible for work performed by a specific contractor (i.e., project manager). In some cases, authority may be formally delegated to a responsible representative that is not an EQ employee.

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**Hazardous Material:** A substance or mixture of substances that may produce adverse effects on the health or safety of a human being, due to characteristics such as being explosive, flammable, poisonous, irritating, or corrosive.

**Hazardous Waste:** A chemical waste which may pose a hazard to people or the environment.

**Incident Command System (ICS):** A standardized on-scene incident management concept designed specifically to allow responders to adopt an integrated organizational structure equal to the complexity and demands of any single incident or multiple incidents without being hindered by jurisdictional boundaries.

**Incident Commander:** The person responsible for all aspects of an emergency response; including quickly developing incident objectives, managing all incident operations, application of resources as well as responsibility for all persons involved. The Incident Commander sets priorities and defines the organization of the incident response teams and the overall Incident Action Plan. The role of Incident Commander may be assumed by Senior or higher Qualified Officers upon their arrival or as the situation dictates. Even if subordinate positions are not assigned, the Incident Commander position will always be designated or assumed. The Incident Commander may, at their own discretion, assign Officers, who may be from the same agency or from assisting agencies, to subordinate or specific positions for the duration of the Emergency.

**Incidental Spill:** See “Minor Spill”

**Incipient Stage Fire:** A fire in its beginning stage that can be controlled by portable fire extinguishers or small hose systems.

**Information Officer:** In an Incident Command System, the Information Officer is the point of contact for the media.

**Liaison Officer:** In the Incident Command System, the Liaison Officer is the contact for representatives from other agencies assigned to the incident.

**Major Spill:** When, as a consequence of a release of a hazardous substance the following conditions, or similar conditions, may develop, such situations would normally be considered emergency situations requiring an emergency response effort:

- High concentrations of toxic substances.
- Situation that is life or injury threatening.
- Imminent Danger to Life and Health (IDLH) environments.
- Situation that presents an oxygen deficient atmosphere.
- Condition that poses a fire or explosion hazard.
- Situation that required an evacuation of the area.
- A situation that requires immediate attention because of the danger posed to employees in the area.

**Minor Spill:** A release of a hazardous substance which does not pose a significant safety or health hazard to employees in the immediate vicinity or to the employee cleaning it up, nor does it have the potential to become an emergency within a short time frame. The spill can be handled safely by employees in the immediate area, without the aid of a coordinated response effort from employees outside the area. Also may be called an “Incidental Spill.”

**National Response Center (NRC):** The sole federal point of contact for reporting oil and chemical spills. Spills may be reported by calling 800-424-8802, or online at [www.nrc.uscg.mil/nrchp.html](http://www.nrc.uscg.mil/nrchp.html). Reporter should be sure to get a case number when reporting for future reference during the incident.

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**Publicly Owned Treatment Works (POTW):** A wastewater treatment facility that is owned by a state or municipality.

**Rally Point:** See “Assembly Area.”

**Recordable:** Occupational illnesses or injuries as defined in OSHA 29 CFR 1904.12.

**Release:** A discharge of a substance that has contacted, or may potentially contact air, ground or surface water, or shorelines.

**Safety Officer:** In the Incident Command System, the Safety Officer monitors safety conditions and develops measures for assuring the safety of all assigned personnel.

**Shelter In Place:** When employees are instructed to stay where they are to avoid possible danger outside. This could occur in the event of severe weather, hazardous materials release, a suspicious intruder, or hostage situation. Select an interior room(s) within the facility, or rooms with no or few windows.

**Spill:** A discharge of a substance that has contacted, or may potentially contact air, ground or surface water, or shorelines.

**Sudden Cardiac Arrest:** A significant life-threatening event when a person’s heart stops or fails to produce a pulse.

**Tornado Warning:** An alert issued by government weather services to warn an area that a tornado may be imminent. It can be issued after either a tornado or funnel cloud has already been spotted, or if there are radar indications that a tornado may be possible.

**Tornado Watch:** Issued when weather conditions are favorable for the development of severe thunderstorms that are capable of producing tornadoes. A watch does not mean that the severe weather is actually occurring only that conditions have created a significant risk for it.

**Utility Failure:** Interruption or loss of services for an extended period of time. Includes: gas, oil, electricity, fiber optics, telephone, microwave towers, water, etc.

**Workplace Violence:** Physical assault, threatening or intimidating behavior, or verbal abuse which occurs at the workplace.

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## Appendix A: Emergency Contact Information

Attached:

- Contact lists
- Notification Flow Chart

Emergency Action Plan  
EQ Florida, Inc.



US ECOLOGY TAMPA  
EMERGENCY CONTACT PERSONNEL / RESPONSE AGENCIES AND ORGANIZATIONS

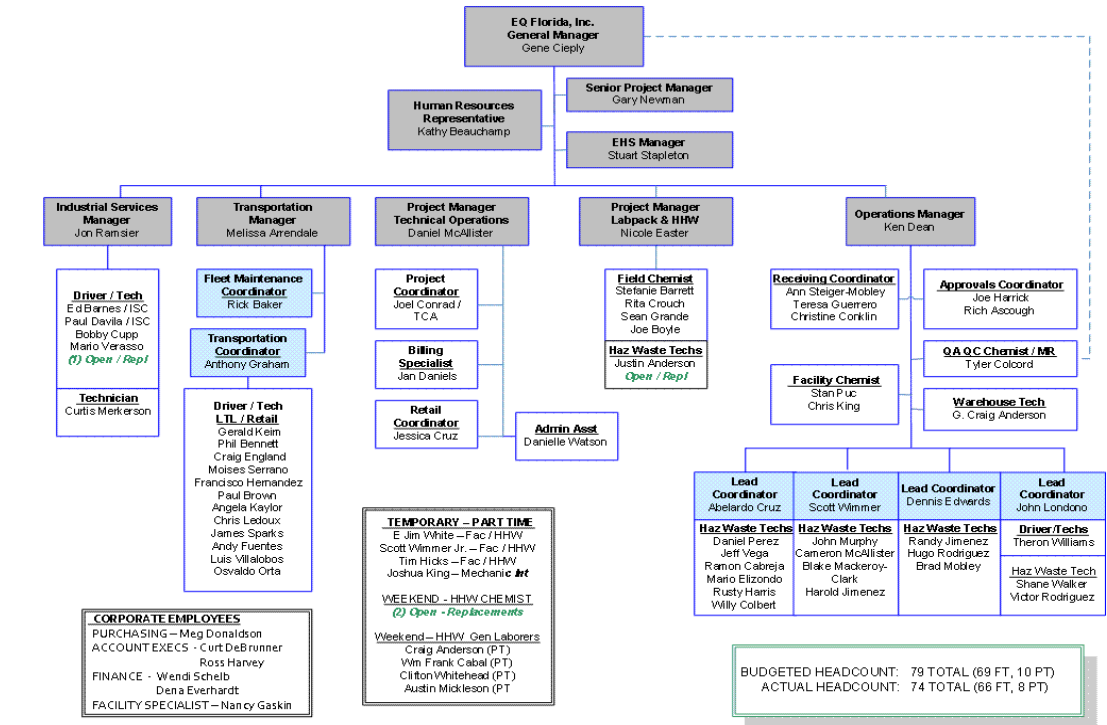
**\*Dial 9 to get an outside line from any office phone**

PRIMARY EMERGENCY COORDINATOR	EMERGENCY MEDICAL SERVICES
Gene Cieply 813-319-3410 (office) 813-777-3998 (cell)	EMS: 911 Brandon Hospital: 813-681-5551 Tampa General Hospital: 813-844-7000
SECONDARY EMERGENCY COORDINATOR	Lakeside Occupational Medical Center: 813-247-4489
Stuart Stapleton 813-319-3423 (office) 813-770-9954 (cell)	GOVERNMENTAL AGENCIES
TERTIARY EMERGENCY COORDINATOR	National Response Center: 800-424-8802 Florida DEP: 850-245-8705 (during business hours) Florida DEP: 850-413-9911 (24 Hour) Florida DEP Southwest District: 813-632-7600 (during business hours) U.S. Coast Guard: 305-415-6820 (spill to navigable waters) US Environmental Protection Agency: 404-562-8700 US Environmental Protection Agency: 404-562-8705 (24 Hour) Poison Control Center: 800-222-1222
CORPORATE MARKETING DIRECTOR	FIRE, POLICE, SHERIFF
Dave Crumrine 734-521-8032 (office) 734-845-8410 (cell)	Tampa Fire Department: 911 or 813-232-6800 Tampa Police Department: 911 or 813-231-6130 Florida Highway Patrol: 911 or 813-632-6859 Hillsborough County Sheriff's Office: 911 or 813-247-8200
ELECTRIC, GAS, & WATER UTILITIES	OTHER CONTACTS
Tampa Electric Co. (TECO): 877-588-1010 City of Tampa Utilities (Water): 813-274-7400 (24 Hour)	City of Tampa - Storm Water: 813-259-1693

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EQ Florida, Inc.

EQ FLORIDA NOTIFICATION FLOW CHART



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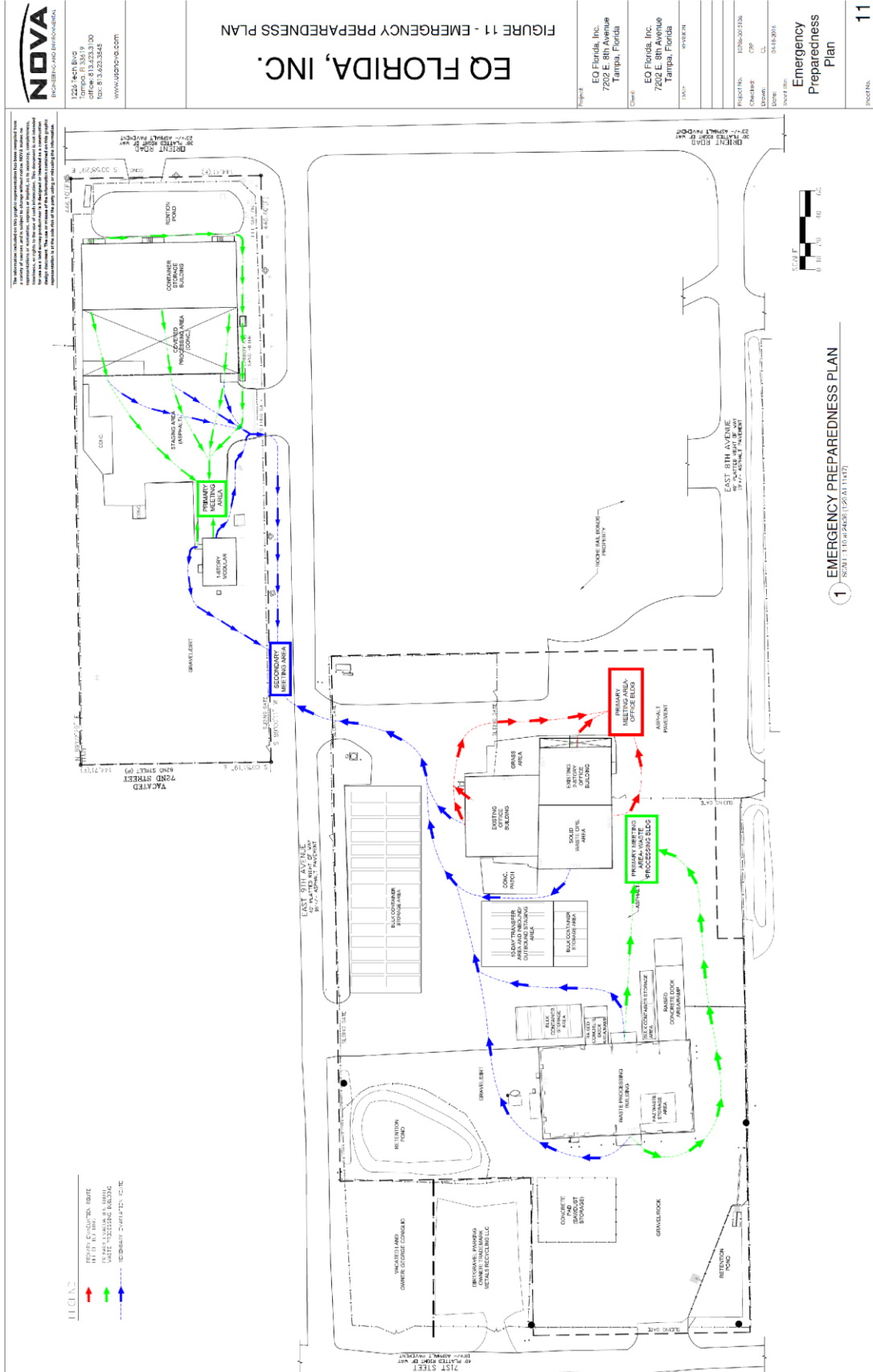
## Appendix B: Drawings and Maps

Attached:

- Emergency Preparedness Drawing
- Maps to nearest hospital and clinic

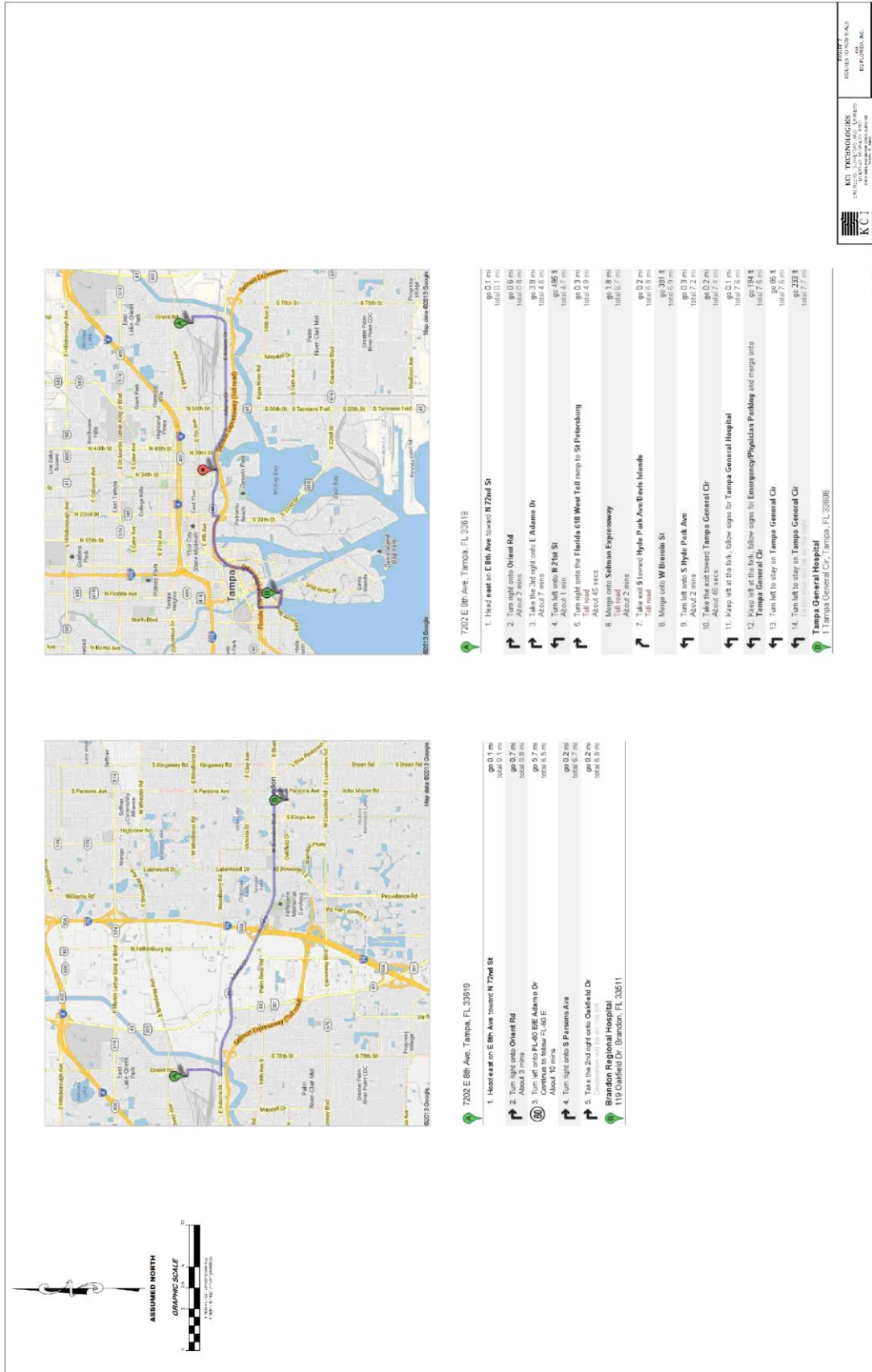


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## Appendix C: Plans and Permits

Attached:

- Contingency Plan
- Stormwater Pollution Prevention Plan (SWP3)
- Consolidated Florida Department of Environmental Protection Hazardous Waste & Solid Waste Permit
- Spill Prevention, Control and Countermeasure Plan (SPCC)

---

## Appendix D: Agency Notification and Reporting

Attached:

- Spill or Release Report and Notification Form (QES-FM-133-ALL)
- Incident Commander Checklist (QES-FM-134-ALL)
- General Notification Requirements Flowchart (QES-FC-003-ALL)

**Emergency Action Plan  
EQ Florida, Inc.**



**SPILL or RELEASE REPORT and NOTIFICATION FORM**

<b>Name of Person Reporting Spill:</b>			<b>Telephone No.:</b>		
<b>Street Address:</b>		<b>Name of Facility:</b>		<b>Spill Location</b> <i>(Be specific):</i>	
<b>City:</b>	<b>State:</b>	<b>Zip Code:</b>			
<b>RELEASE DATA:</b> Complete all applicable categories. Check all boxes that apply to the release. Provide the best available information regarding the release and its impacts. Attach additional pages if necessary.					
<b>Date &amp; Time of Release</b> <i>(if known)</i>		<b>Date &amp; Time of Discovery</b>		<b>Duration of Release</b> <i>(if known)</i>	
				<input type="checkbox"/> days <input type="checkbox"/> hours <input type="checkbox"/> minutes	
				<input type="checkbox"/> Explosion <input type="checkbox"/> Fire <input type="checkbox"/> Leaking container <input type="checkbox"/> Loading/unloading	
				<input type="checkbox"/> Pipe/valve leak or rupture <input type="checkbox"/> Vehicle accident <input type="checkbox"/> Other	
<b>Material Release</b> <i>(Chemical or Trade Name)</i>		<b>CAS #</b> <i>(if known)</i>		<b>RQ Exceeded within 24 hours?</b>	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Factors Contributing to Release:</b>			<b>Source of Loss:</b>		
<input type="checkbox"/> Equipment failure <input type="checkbox"/> Operator error <input type="checkbox"/> Faulty process design			<input type="checkbox"/> Training <input type="checkbox"/> Weather conditions <input type="checkbox"/> Other		
			<input type="checkbox"/> Container <input type="checkbox"/> Equipment <input type="checkbox"/> Pipeline		
			<input type="checkbox"/> Ship <input type="checkbox"/> Tank <input type="checkbox"/> Tanker		
			<input type="checkbox"/> Truck/Vehicle <input type="checkbox"/> Other		
<b>Type of material released:</b>		<b>Material listed on:</b>		<b>Immediate Actions Taken:</b>	
<input type="checkbox"/> Oil <input type="checkbox"/> Flammable / Combustible Material <input type="checkbox"/> Waste <input type="checkbox"/> State Regulated Material <input type="checkbox"/> Hazardous Substance <input type="checkbox"/> Other		<input type="checkbox"/> CERCLA list (40 CFR 302.4) <input type="checkbox"/> Extremely Hazardous Substance- EPCRA Section 302 list (40 CFR 355) <input type="checkbox"/> RCRA Hazardous Waste <input type="checkbox"/> State list <input type="checkbox"/> Other list		<input type="checkbox"/> Containment <input type="checkbox"/> Dilution <input type="checkbox"/> System shut down <input type="checkbox"/> Evacuation <input type="checkbox"/> Hazard Removal <input type="checkbox"/> Neutralization	
				<input type="checkbox"/> Diversion of release to treatment <input type="checkbox"/> Decontamination of persons / equipment <input type="checkbox"/> Monitoring <input type="checkbox"/> Other	
<b>Spill / Release Reached:</b>					
<input type="checkbox"/> <b>Surface waters</b> <i>(include name of river, lake, drain, etc. involved):</i>  Distance from spill location to surface water:					
<input type="checkbox"/> <b>Drain connected to offsite sanitary sewer</b> <i>(include name of wastewater treatment plant and/or street drain, if known):</i>					
<input type="checkbox"/> <b>Drain connected to storm sewer</b> <i>(include name of drain or body of water it discharges into, if known):</i>					
<input type="checkbox"/> <b>Groundwater</b> <i>(include name of aquifer, if known):</i>					
<input type="checkbox"/> <b>Soils</b> <i>(include type e.g., clay, sand, loam, etc., if known):</i>					
<input type="checkbox"/> <b>Air</b>					
<input type="checkbox"/> <b>Other</b> <i>(explain):</i>					

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**Emergency Action Plan**  
**EQ Florida, Inc.**

<b>Extent of Injuries, if any:</b>	<b>Was anyone Hospitalized?</b> <input type="checkbox"/> Yes, Number Hospitalized: <input type="checkbox"/> No			
Describe the incident, the type of equipment involved in the release, how the volume of loss was determined, along with any resulting environmental damage caused by the release. Identify who immediately responded to the incident and who did further cleanup activities (Company employees or contractors – include cleanup company name, contact person, and telephone number).				
<b>Estimated quantity of any recovered materials and description of how those materials were managed (include disposal method if applicable.)</b>				
<b>Associated Health Risks and Precautions:</b>				
<b>Regulatory Agency / Company Notifications</b> <i>Contacts are conducted by telephone only.</i>	<b>Time Contacted</b>	<b>Date Contacted</b>	<b>Person Contacted</b>	<b>By Whom</b>
<input type="checkbox"/> <b>National Response Center (NRC)</b> 800-424-8802 Case No.:				
<input type="checkbox"/> <b>State Response Line</b> Phone : ID No.:				
<input type="checkbox"/> <b>State Emergency Response Commission (SERC)</b> Phone:				
<input type="checkbox"/> <b>Local Emergency Planning Committee (LEPC)</b> Phone:				
<input type="checkbox"/> <b>Wastewater Treatment Plant Authority</b> Phone:				
<input type="checkbox"/> <b>EQ Approved Emergency Response Firms</b> Name: Phone: Name: Phone: Name: Phone:				
<input type="checkbox"/> <b>QEHS Department</b> Scott Maris 734-740-3380 Steve Haton 734-576-0113 Other:				
<input type="checkbox"/> <b>Corporate Communications Manager</b> Bob Doyle 734-576-0480				
<input type="checkbox"/> <b>Other</b>				

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## Appendix E: Forms and Checklists

Attached:

- Emergency Preparedness Drawing Checklist (QES-FM-132-ALL)
- Bomb Threat Checklist (QES-FM-136-ALL)
- Assault / Threat Report (QES-FM-137-ALL)
- Spill Kit Checklist (QES-FM-135-ALL)
- Emergency Shut Down Checklist (QES-FM-138-ALL)

**Emergency Action Plan  
EQ Florida, Inc.**

<b>EMERGENCY PREPAREDNESS DRAWING CHECKLIST</b>			
<b>EQ Location:</b>	<b>Assessor:</b>	<b>Date:</b>	
An emergency preparedness drawing is required for all EQ locations. This checklist may be used as a tool for developing the drawing.			
<b>Does the drawing show the following:</b>			
	<b>Yes</b>	<b>NO</b>	<b>N/A</b>
Locations of fire extinguishers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency egress routes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency showers / eyewashes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Assembly areas (rally points)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High voltage / primary electrical disconnects	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spill kits / supplies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AED locations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fire hydrants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fire department connections	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
First aid kits / supplies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MSDS stations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manholes / sewers / catch basins / blind sumps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fire alarm pull stations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electrical rooms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SCBAs (5-minute escape air packs)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gas Main	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Furnace	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overhead lines / piping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Heated equipment (tanks, boilers, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS:</b>			

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 <b>BOMB THREAT CHECKLIST</b>				
<b>Name:</b>		<b>EQ Location:</b>		<b>Date:</b>
The person receiving the threat should keep the caller on the line as long as possible in order to obtain information that will help the police.				
<b>Information to Attempt to Obtain from the Caller</b>				
When will the bomb explode?	Where is it located?	What does it look like?	What type of bomb is it?	
What will cause it to explode?	Did you place the bomb?	Why?	Are there any others?	
Where are you?	What is your name?	Anything else?		
<b>Message (try to capture exact wording of the threat)</b>				
<b>Caller's Voice</b>				
<input type="checkbox"/> Male	<input type="checkbox"/> Female	<input type="checkbox"/> Rapid	<input type="checkbox"/> Foul Mouthed	<input type="checkbox"/> Raspy
Approximate Age:		<input type="checkbox"/> Soft	<input type="checkbox"/> Slurred	<input type="checkbox"/> Deep
<input type="checkbox"/> Angry	<input type="checkbox"/> Loud	<input type="checkbox"/> Incoherent	<input type="checkbox"/> Ragged	<input type="checkbox"/> Disguised
<input type="checkbox"/> Calm	<input type="checkbox"/> Irrational	<input type="checkbox"/> Nasal	<input type="checkbox"/> Clearing Throat	<input type="checkbox"/> Taped Message
<input type="checkbox"/> Excited	<input type="checkbox"/> Laughing	<input type="checkbox"/> Stutter	<input type="checkbox"/> Deep Breathing	<input type="checkbox"/> Statement was read
<input type="checkbox"/> Slow	<input type="checkbox"/> Crying	<input type="checkbox"/> Lisp	<input type="checkbox"/> Cracking Voice	<input type="checkbox"/>
<b>Background Noises</b>				
<input type="checkbox"/> Street (Cars, etc.)	<input type="checkbox"/> Music	<input type="checkbox"/> Machinery	<input type="checkbox"/> Local Call	Other:
<input type="checkbox"/> Airplane	<input type="checkbox"/> Household (TV, Dishwasher)	<input type="checkbox"/> Animal Noises	<input type="checkbox"/> Long Distance	Other:
<input type="checkbox"/> Other Voices	<input type="checkbox"/> Motor (Fan, Air Conditioner)	<input type="checkbox"/> Phone Booth	<input type="checkbox"/> Deep Breathing	Other:
<input type="checkbox"/> PA System	<input type="checkbox"/> Office (Copier, Fax)	<input type="checkbox"/> Static	Other:	Other:
<ol style="list-style-type: none"> <li>1. Immediately after contact with the caller has ended, the person receiving the call should notify his/her supervisor and the Emergency Coordinator. If at all possible, this notification should take place during the phone call by attracting the attention of another employee and relaying as much information as possible while the caller is still on the line.</li> <li>2. The Emergency Coordinator will call 911.</li> <li>3. Follow Police instructions.</li> </ol>				

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Emergency Action Plan  
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ASSAULT/THREAT REPORT

EMPLOYEE

Employee Name:	Job Title:
Work Office Address (street, city, state, zip)	Telephone: Work: Home:
Manager's Name:	Telephone:

INCIDENT

Name of Assaulter/Threatener:	Is she/he an employee? <input type="checkbox"/> yes <input type="checkbox"/> no
Date of Assault/Threat:	Location of Assault/Threat:
Assault/Threat was from: <input type="checkbox"/> Personal Confrontation <input type="checkbox"/> Telephone Conversation <input type="checkbox"/> Other Please Explain:	
Were there witnesses? <input type="checkbox"/> yes <input type="checkbox"/> no If yes, how many? Provide information below and attach their statements. (Determine if witnesses prefer to remain anonymous due to the concern of retaliation by the aggressor.)	

WITNESSES (If additional Witnesses, provide information on attached sheet of paper.)

Witness 1-Name:	Telephone: Work: Home:
Address (street, city, state, zip):	Witness Role (i.e. employee, customer, etc.)
Witness 2-Name:	Telephone: Work: Home:
Address (street, city, state, zip):	Witness Role (i.e. employee, customer, etc.)

IF ASSAULTED

1. What started the assault?
2. What did the assaulter say when you were assaulted?
3. What was used to hit/strike/injure you?
4. What injuries did you sustain? Was medical treatment necessary?
5. How did the assault end?
6. How did you leave the assault site?

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**IF THREATENED**

1. As closely as possible, what were the exact words used?
2. Was the Threatener in a position to carry out the threat immediately?
3. How serious do you believe the threat was and why?

**EMPLOYEE RELATED ACTIONS**

1. What actions were taken by the employee? (e.g. filed workers compensation, obtained medical treatment, used sick leave/vacation, etc.)
2. What specific actions from Employer does employee request related to assault/threat? If none, so indicate.

**LAW ENFORCEMENT INFORMATION** (Manager, Employee, etc. Attach copy of police report when possible.)

Law Enforcement Agency Contacted: Name of Person/Officer Helping:	Date Contacted:	Telephone Number:
Was a written report completed? <input type="checkbox"/> yes <input type="checkbox"/> no What action was promised?		

**MANAGER ACTIONS**

Directions given to Employee (i.e. go home, go to hospital, etc.)
Manager Recommendation: <input type="checkbox"/> Prosecution <input type="checkbox"/> Restraining Order <input type="checkbox"/> Letter to Threatener <input type="checkbox"/> Other, please specify:

**LEGAL COUNSEL ACTION(S)**

Actions Taken:
----------------

**NOTIFICATION DATES**

Received:	Employee Notified of Chosen Action: <input type="checkbox"/> Yes <input type="checkbox"/> No	Health & Safety Officer Notified: <input type="checkbox"/> Yes <input type="checkbox"/> No
Division Management Notified: <input type="checkbox"/> Yes <input type="checkbox"/> No	EAP Officer Notified: <input type="checkbox"/> Yes <input type="checkbox"/> No	Was Employee and Management notified of other options that can be pursued personally? <input type="checkbox"/> Yes <input type="checkbox"/> No

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 <b>SPILL KIT CHECKLIST</b>			
<b>Spill Kit Number / Location:</b>	<b>Assessor:</b>	<b>Date:</b>	
<i>The following are suggested items to be included in a spill kit. Additional items may be added to reflect the needs of the facility, department, process, etc. This list may be kept with each spill kit to use for inspection and inventory purposes.</i>			
<b>Equipment:</b>	<b>Yes</b>	<b>NO</b>	<b>N/A</b>
1 Overpack (85 gal) drum	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 Plastic liners (garbage bags may be sufficient)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 Explosion-proof flashlight	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 Floor sign (e.g. "Slippery When Wet", "Danger Keep Out", or equivalent)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 roll Caution Tape	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spill pillows, booms, pads, etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 Squeegee, Floor Size (18" head)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 Polypropylene Broom	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 Plastic Shovel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 Dust Pan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biohazard waste disposal bags	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 roll pH paper	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 bag clay absorbent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hazardous Waste Labels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drain Cover(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 NIOSH Guidebook	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 DOT Emergency Response Guidebook	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>PPE:</b>	<b>Yes</b>	<b>NO</b>	<b>N/A</b>
4 TYVEK Suits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4 pairs Disposable Polyethylene Booties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6 pairs Nitrile Gloves	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6 pairs Disposable Polyethylene Gloves	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 pairs Chemical Splash Goggles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 Face Shields	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS:</b>			

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**Emergency Action Plan  
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**Emergency Shutdown Checklist**

*During an emergency, some facilities may require designated employees remain behind briefly to operate fire extinguishers or shut down gas and/or electrical systems and other special equipment that could be damaged if left operating or create additional hazards to emergency responders, or cause a release of hazardous materials. If any employees will stay behind, an emergency shutdown plan must be developed and should describe in detail the procedures to be followed by these employees. This checklist may be used as a tool for developing the emergency shutdown plan.*

Does your plan have provisions for:	
	Indicating under what conditions shutdown must occur or be considered?
	Identifying who will make the decision to shut down equipment, utilities, or the facility?
	Specifying who is responsible for carrying out shutdown? Assigning specific roles for equipment and utility (e.g., gas, water) shutoffs, and for checking automatic shutoffs (and for doing it manually if the automatic system fails)? Identifying who is to be equipment shutoff backup? Requiring report of shutdown completion to the Emergency Coordinator?
	Establishing prearranged order or signal to initiate shutdown procedures appropriate for the impending hazard?
	A complete checklist for emergency shutdown?
	Diagrams to show where to turn everything off?
	Posting shutdown instructions on or near control panels, valves, switches, and operating mechanisms of each critical piece of equipment?
	Instructing and training personnel to implement emergency shutdown procedures?
	Designating personnel to close doors and windows, tie down loose equipment, move equipment, supplies, and hazardous material to a sheltered area, and barricade windows and doors as circumstance requires and time allows?
	Assigning personnel to stand by firefighting equipment to be ready to extinguish incipient fires?
	Identifying and protecting valuable and sensitive tools, instruments, machinery, and materials?
	Protecting equipment and hazardous materials stored outside by banding tiedown, moving critical or valuable items to inside storage, or moving mobile equipment to high ground or to protected sides of buildings, as circumstance requires and time allows?
	Establishing damage assessment and control techniques to minimize property loss during a disaster?
	Testing shutdown procedures for utility services and equipment by department managers?
	Indicating under what conditions it would be safe to complete shutdown before ordering general evacuation?
	Indicating under what conditions it would be safe to complete shutdown after ordering general evacuation? Assigning personnel to remain after an evacuation to perform critical shutdown activities and training them to recognize when to abandon the task and evacuate before their egress path is blocked?
<b>COMMENTS:</b>	

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