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July 31, 2016

Ms. Carrie Kruchell, P.G.
Professional Geologist II
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 4560
Tallahassee, FL 32399-2400
Carrie.L.Kruchell@dep.state.fl.us

Re: Incomplete Response to First Request for Additional Information (RAI)
Hillsborough County – Hazardous Waste
Facility Name: EQ Florida, Inc.
Facility ID: FLD 981 932 494
DEP Application No.: 34875-HO-012

Dear Ms. Kruchell:

In response to the Incomplete Response to First Request for Additional Information (RAI) letter dated July 1, 2016, EQ Florida, Inc. has revised the application based on this request as noted in the attachment. This response and the revised Volume 1 and Volume 2 of the application have been submitted in electric format to ftp://ftp.dep.state.fl.us/pub/incoming/DWM.

If you have any questions or comments concerning this matter please call me at (813) 319-3423, or by email at Stuart.Stapleton@usecology.com.

Sincerely,

Stuart Stapleton

Stuart Stapleton
EHS Manager
EQ Florida, Inc.

Cc: (with Attachment)
Bryan Baker, DEP HW Program & Permitting - Bryan.Baker@dep.state.fl.us
Elizabeth Knauss, DEP Southwest District - Elizabeth.Knauss@dep.state.fl.us
Kelly Honey, DEP Southwest District – Kelly.Honey@DEP.state.fl.us
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Attachment: List of Missing or Incomplete Information

Facility Name: EQ Florida, Inc. (EQFL)
Facility ID: FLD 981 932 494
DEP Application No.: 34875-HO-12

The following comments are in response to the Department's letter dated July 1, 2016 requesting the submittal of missing or incomplete information.

1. **Permit Application Form, Part D.3**-Revise the Process Code table found in Appendix B, Volume 2 of 3 of the November 2013 application to include "process design capacity and units of measure". Annual quantities from 2015 should be used.
    a. *Hazardous Waste Code K062 associated with Process Code T21 and showing an Annual Quantity of 10,000 gallons of "actual waste processed in 2015" (Footnote 2), should be footnoted in the table within Appendix B as "currently proposed" or similar language. It is our understanding that K062 waste has not been permitted for treatment to date at EQ. Please clarify on the application form Part A, and also the form in Appendix B, Volume 2 of 3.*

       A Footnote has been added to the Summary of Characteristic and Listed Hazardous Wastes table found in Appendix B, Volume 2 of 3 noting that the volumes indicated in the table are the proposed estimated volume of K062 to be treated. Application form Part A references the revised table.

2. **Section 2.1 – Permit Modification Overview**.
    a. *Revise this section to include all operational changes proposed by EQFL as discussed and agreed to between December 18, 2015 and February 22, 2016. Please ensure that the language that was incorporated for bullet points 1 and 2 in the RAI letter dated March 1, 2016 is incorporated in Section 2.1 of the permit application. Bullet points 5 & 6 of this section require clarification and report section references (See email correspondence dated June 23, 2016).*

       Bullet point 1 and 2 have been revised and incorporate bullet points 1 and 2 found in the RAI letter dated March 1, 2016. Bullet points 5 and 6 have been revised based on the correspondence referenced above.

b. *To bullet points 1 & 2 mentioned above, add in a reference (section, page number) for the location within the Waste Analysis Plan (WAP) where the description of the various treatment methods EQ will utilize for D002, and D004-D011 and K062, can be found.*

Section 12 of the application best describes the various treatment methods EQ utilizes for D002, and D004-D011 and K062. The following language has been added to bullet points 1 and 2: "Reference Section 12 for treatment methods and processes and Appendix J (Volume 2 of 3) for SOP OPS-OP-071-FLA Hazardous Waste Treatment."

c. *To bullet point 2, add in the following: "EQFL ensures that the proposed permitted hazardous waste storage area within the Waste Processing Building (WPB) complies with 264.175(a) and 264.175(b)(1) through (b)(5)." Please describe how the WPB's proposed permitted storage area complies with this rule in Section 2.3.4(6) of the permit modification application (See Comment 4 below).*

Bullet point 2 has been revised accordingly and indicates that the area within the Waste Processing Building (WPB) complies with 264.175(a) and 264.175(b)(1) through (b)(5). Section 2.3.4(6) of the permit modification application describes in detail the methods of compliance with 264.175(a) and 264.175(b)(1) through (b)(5).

d. Revise the table "Total Existing & Proposed Hazardous Waste Storage Capacities" to include a footnote beneath the table as included in the RAI letter of March 1, 2016, and as presented below:

i. *NOTES: 1 – The proposed permitted storage area replaces the currently allowed 'staging' of a maximum of 80 drums/4,400 gallons. If permitted, the WPB will have a total hazardous waste storage capacity of 4,400 gallons.*

The table "Total Existing & Proposed Hazardous Waste Storage Capacities" has been revised and includes a footnote that indicates that the proposed permitted storage area replaces the currently allowed 'staging' of a maximum of 80 drums/4,400 gallons, and if permitted, the WPB will have a total hazardous waste storage capacity of 4,400 gallons.

3. **Section 2.3 – Facility Layout and Operations**. Revise this section to fully describe each of the buildings and/or storage areas across the facility, their construction, physical locations, the operations conducted within, and the existing/proposed total hazardous waste storage capacity within each.
   a. *The BCSA description (Section 2.3.5) should also explain and reference the location of the "Cracks & Gaps" program SOP.*

      Section 2.3.5 has been revised and now includes reference to the "Cracks and Gaps" SOP (OPS-OP-071-FLA) which is contained in Appendix J of Volume 2 of 3 of this permit application.

   b. *Also, it is our understanding that the yellow striping in front of the Reactives Storage Cabinet should have already been applied. Please correct and confirm.*

      The yellow striping is in place in front of the Reactives Storage Cabinet. Section 2.3.4 has been revised and now indicates that a similar bright yellow line encompasses the perimeter of the reactives magazine.

4. **Section 2.3.4 –Waste Processing Building (WPB).** *Add in the following: "EQFL ensures that the proposed permitted hazardous waste storage area within the WPB complies with 264.175(a) and 264.175(b)(1) through (b)(5)." Please describe in this section how the WPB's proposed permitted hazardous waste storage area (4,400 gallons) complies with this rule.*

   Section 2.3.4 has been revised accordingly and indicates that the area within the Waste Processing Building (WPB) complies with 264.175(a) and 264.175(b)(1) through (b)(5). Section 2.3.4(6) of the permit modification application describes in detail the methods of compliance with 264.175(a) and 264.175(b)(1) through (b)(5).

5. **Section 2.4.5 – Treatment of Characteristic (and Listed K062) Hazardous Wastes**. Insert an explanation of how 'characteristic' and 'listed' wastes will be treated and also reference the section within the WAP that provides more details on the selected treatment process(es)
   a. *Please add to this section and to the WAP that "treatment of characteristic waste (D002 and D004 through D011) must meet 40 CFR 268.40 and Underlying Hazardous Constituents (UHCs), if required".*

Section 2.4.5 and Section 4.8 of the WAP have been revised accordingly.

b. *There is no mention in this section of how D002 waste will be treated. Please revise. According to 268.40 Treatment Standards, D002 may be treated by DEACT (deactivation) and meet 268.48 standards. Section 4.3.1 of the WAP states that Corrosives (D002) will be disposed of "offsite via neutralization" (NEUTR), which we understand is the DEACT method preferred by EQ. Please confirm.*

Section 2.4.5 has been revised and indicates that the first step in the treatment process for all liquid wastes is the neutralization (NEUTR) of D002 acidic or alkaline materials. Section4.3.1 of the WAP has been revised and reads as follows: "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."

c. *Reference the WAP within this section and provide more details regarding the NEUTR and STABL (stabilization) treatment methodologies that EQ intend to use.*

Revised accordingly and provides details regarding the NEUTR and STABL (stabilization) treatment methodologies that EQ intends to use.

d. *Note that while K062 may be treated via STABL, confirmatory TCLP sampling must prove that the resultant concentrations of total chromium and lead are below their "non-wastewater" or "wastewater" Universal Treatment Standards (UTS) guideline levels as stated in 268.40. Please confirm the chemical nature of the K062 being proposed for treatment and whether it is solely a product of manufacturing SIC Codes 331 & 332, and has not been pre-treated by 'lime stabilization'.*

Section 2.4.5 has been revised and includes the following statement: "Additionally, when wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue must meet the lowest treatment standard for the constituent of concern." The

K062 waste being proposed for treatment is solely a product of manufacturing SIC Codes 331 & 332, and has not been pre-treated by 'lime stabilization'.

e. *In accordance with 268.40, Subpart D(c), "When wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue must meet the lowest treatment standard for the constituent of concern". Please add this guidance to this section and also to the WAP.*

Section 2.4.5 and Section 4.8 of the WAP have been revised accordingly.

f. *Reference the Hazardous Waste Treatment SOP here, and also in the WAP section.*

Section 2.4.5 and Section 4.8 of the WAP have been revised and now reference Hazardous Waste Treatment OPS-OP-071-FLA.

6. **Section 2.4.10-Household (Hazardous) Waste (HW) Management**. *This is a newly added section to the existing permit. Under RCRA, the term is "Household Waste". The former section on laboratory wastes appears to have been deleted*.

a. *There needs to be a distinction between "lab pack" handling of actual 'laboratory' waste vs Household Waste "lab pack" management in this permit application. It is important to note that laboratory-derived waste in lab packs is not the same thing as Household Waste in lab packs. Please add back the section in the existing permit about the procedures for handling various Laboratory Wastes (lab packs).*

Section 2.4.10 is included for informational purposes only. The nomenclature has been revised and now reflects the RCRA terminology. When laboratory waste (i.e. lab packs) is received, it is handled according to Sections 2.4.1 and Section 2.4.2. Section 4.11 of the WAP explains the distinction between the two types of waste.

b. *If none of the Household Waste received by EQ is hazardous, this section can be moved to the Solid Waste (SW) portion of the permit, or it can stay for informational purposes.*

Section 2.4.10 is included for informational purposes only. The nomenclature has been revised and now reflects the RCRA terminology. When laboratory waste (i.e. lab packs) is received, it is handled according to Sections 2.4.1 and Section 2.4.2. Section 4.11 of the WAP explains the distinction between the two types of waste.

7. **Section 4.0—Waste Analysis Plan**. *This section remains incomplete*. Review this section in its entirety and ensure that the revised WAP is in accordance with the "Waste Analysis at Facilities that Generate, Treat, Store and Dispose of Hazardous Waste – Final", issued July 2015, EPA 530-R-12-001. Emphasis should be placed on the identification of which specific treatment methods will be utilized for specific waste codes, succinct explanations of the treatment process(es) and sampling protocols and analytical methods (and lab data turnaround times) utilized for each. EQFL should be able to describe the new 'stabilization' treatment method which became permitted a year ago, and be able to include detailed pass/fail rates per treatment batch per treatment method. Specifically, more details are required for the proposed 'lime-stabilization' treatment of waste code K062. More details are required for treatment of waste codes D002, and D004 through D011 and K062 (See Comment 5 above).

   a. *Include a detailed explanation of how EQ expects to undertake sampling, analysis and disposal of the various waste codes (D002, D004-D011 & K062) specific to the Hazardous Waste Treatment Tank*.

      Section 4.8 of the WAP includes a detailed description of the sampling and analytical methods that will be used for the various waste codes (D002, D004-D011 & K062) specific to the Hazardous Waste Treatment Tank. Section 12 describes the disposal methods.

   b. Section 4.3.1—Waste Characterization. *Revise this section to add in the hazardous waste codes beneath the various characteristics (e.g., Ignitable—D001), and add in a section for "Listed Waste" such as for K062*. i. *"Corrosive Waste (C), means D002. According to 268.40 Treatment Standards, D002 may be treated by DEACT (deactivation) and meet 268.48 standards. This section of the WAP states that Corrosives (D002) will be disposed of "offsite via NEUTR".*

40 CFR 261.30 indicates the basis for listing the classes and types of wastes listed in 40 CFR 261 Subpart D and was used as the guide for the waste characterization types identified in Section 4.3.1. A footnote has been added to each of the waste types indicating that 40 CFR 261.30 was used for listing the classes and types of wastes.

c. Section 4.11—Acceptance of Packaged Laboratory Wastes (Lab Packs). *This section does not seem correct. Laboratory-derived chemicals (actual lab packs) are not the same as Household Waste (e.g., UF lab packs). There needs to be a distinction between actual 'laboratory' lab pack handling and 'Household Waste' lab pack handling in this permit application.*

Section 4.11 has been revised and makes a distinction between laboratory derived chemicals (lab packs) and Household (Hazardous) Waste (HW).

d. *A final confirmatory lab sample for the 3 RCRA heavy metals that form K062 (total chromium, lead and nickel) shall be collected and analyzed to ensure that EQ have actually treated this waste down to its minimum referenced UTS concentration levels (for non-wastewaters and/or for wastewaters); a TCLP sample may indicate a 'pass' or 'fail' for whether the specific constituent has a tendency to leach into the environment; however, the K062 may be assumed to be still hazardous until it is treated down to or below the minimum referenced UTS concentrations.*

Section 4.8 has been revised and indicates that when wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue must meet the lowest treatment standard for the constituent of concern.

8. **Section 9.0 – Closure Plan**. The Department is in the middle of performing a detailed review for financial assurance purposes. A list of Closure Cost questions was sent to you separately via email on June 24, 2016.

1. Page 31, 2.4.11 Universal Waste – Is the cost for disposing of Universal Waste considered in this permit modification?

Yes, Universal Waste is included as part of the total Container Storage Building inventory and the associated closure costs.

2. Page 85, Oxidizers: Accept the deletion of the word "sent" in the first line.

   The word "sent" was deleted.

3. Page 85, Other Hazardous Waste: Please add the word "days" to the last line of this paragraph following the words "maximum of ten (10)".

   The word "days" was added.

4. Page 86, Section 9.6 Decontamination: This section mentions that one soil sample will be collected from the Stormwater Retention Pond (SWMU 3). Two additional samples will be collected from the northeast (upgradient) and southeast (downgradient) corners of the facility. A soil sample will also be collected from under the building. Lastly, additional samples will be collected if visual evidence indicates a sample is warranted. The Department concludes from this description of soil sampling activities that at least four soil samples will be collected with the possibility of more than four. How many soil samples are budgeted in the cost estimate?

   Section 9.6 was revised. Sampling requirements were clarified for the WPB and CSB. Eight (8) soil samples are budgeted (4 samples for each location). The cost of eight (8) soil sample are included in the closure cost estimate. The cost of additional soil samples, if needed, will be funded as part of the contingency budget.

5. Page 87, Section 9.6 Decontamination, paragraph 2: This paragraph states that three shallow, surface soil samples will be obtained and analyzed. The main sample will be collected from SWMU 3 but upgradient, downgradient and quality control samples will also be collected and analyzed for a total of four samples. Please clarify this paragraph so that it is clear that four, not three, samples will be collected and analyzed.

   Section 9.6 was revised. Sampling requirements were clarified for the WPB and CSB. Eight (8) soil samples are budgeted, four (4) samples for each location. The cost for eight (8) soil samples are included in the closure cost estimate. The cost of additional soil samples, if needed, will be funded as part of the contingency budget.

6. Page 87, Section 9.6.1 Closure Certification: In the sentence for the second inspection, please reword the sentence "Upon completion of all removal (activities) for off-site disposal."

   The sentence now reads "Occurs after all wastes are shipped to off-site disposal facilities."

7. Page 87, Section 9.7: The text of the closure plan states on page 86 that the Container Storage Building (CSB) will be steam cleaned and samples of the rinsate will be collected and analyzed. Where, in the table on page 87, are these costs listed?

   Both the WPB and CSB decontamination tables were revised and now include the cost of the rinsate analytical.

8. Page 88, Section 9.9: There's an assumption that the disposal volume in the treatment tank has been accounted for in the TSDF or Transfer Operations, please explain.

   Section 9.9 has been revised and the assumption has been removed. Disposal costs associated with the storage of the proposed 4,400 gallon storage is included as a line item in the WPB closure table.

9. Page 89, Section 9.9, second table: Is the title for this table "WPB Decontamination Closure Cost" appropriate? Are the steam cleaning costs, mobilizations, rinsate disposal and closure certification listed in this table only applicable to the WPB?

   A new CSB Decontamination Closure Cost table has been added.

10. Page 89, Section 9.9, second table: The word "Transportation" is misspelled in the first line item.

    Typo corrected

11. Page 89, Section 9.9, second table: If as stated on page 88 that labor costs are based on 225 square feet per hour at a rate of $40/hour, then 8,050 square feet should take 36 hours, not 26. Please make the necessary corrections to this table and any subsequent tables affected.

    Typo corrected.

12. Page 89, Section 9.9, second table: Closure Certification for the Waste Processing Building is included in this table. Does the Closure Certification apply to any other hazardous waste storage areas at this facility?

    Additional funds for the Waste Processing Building Closure Certification are included.

13. Page 90, Section 9.11 Transportation: Total Cost for each line item should be obtained by multiplying the number of loads by the Cost per Load. Please either explain how you arrived at the Total Costs listed or revise them.

    Typo corrected.

14. Page 90, Section 9.12 Closure Cost Estimate: There appear to be several activities missing from the Closure Cost Estimates. The costs associated with soil sampling and analysis, decontamination of the CSB, rinsate analysis from the CSB and WPB, along engineering oversight are not listed in the Total Closure Cost estimates. The text on page 87 also states that three engineering inspections will take place during closure activates. The cost for those inspections is not included. Please address these omissions.

    See above.

15. Page 91, Section 9.14: #3 lists that Offsite Disposal Shipments will be completed within 30 days. However, the text on page 85 states that removal of all corrosives may take up to 40 days. Please include the maximum timeframe for removal of corrosives in your closure schedule.

    The text has been corrected. Removal of all corrosives may take up to 30 days.

9. **<u>Section 10 – Use and Management of Containers</u>**. *Add in a section title for the WPB and an overview of the proposed permitted hazardous waste storage area within the WPB and the following: "EQFL ensures that the proposed permitted hazardous waste storage area within the WPB complies with 264.175(a) and 264.175(b)(1) through (b)(5)." The support is generally there, but just needs the rule language to support EQ's argument.*

    Section 10.5 has been revised. A section title, operational overview, and the rule language has been added.

10. **Section 11 – On-Ground Treatment Tank System**.

a. *Section 11.1 – Design of Treatment Tank System. Please add "proposed" before K062 in the first sentence.*

Section 11.1 has been revised accordingly.

b. *Section 11.2 – Treatment Description, Page 99. Please revise the paragraph that begins with "Based on generator knowledge…" to state that "EQFL realize that proper identification of UHC are the responsibility of the facility".*

The paragraph has been revised and now reads as follows: "Waste Characterization Reports are submitted by generators for in-bound shipments. The proper identification of UHCs are the responsibility of the facility and the reports are reviewed to confirm that no organic UHCs are present. Only waste containing characteristic metals are treated on-site. Waste will be treated to meet inorganic constituent concentration UTS's listed in Part 268-Subpart D as required so that the treated material is rendered non-hazardous and can be decharacterized."

c. *Table 11.1 should be revised to include "mg/L" in the title "Non-Wastewater UTS/TCLP".*

Table 11.1 has been revised and includes "mg/L" in the title "Non-Wastewater UTS/TCLP".

d. *Since soils will not be treated in the hazardous waste treatment tank, please remove the column "Alternative Soil Treatment Standards". These standards only apply to soil matrices*.

Table 11.1 has been revised and the column "Alternative Soil Treatment Standards" has been removed.

11. **Section 12 – Facility Air Emissions Requirements**.

a. Section 12.1—Introduction. *Include a paragraph about the Hazardous Waste Treatment tank and potential emissions during*

treatment. How does EQFL ensure that no volatile organic aromatics (VOAs), volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCs) are resident in the waste to be treated which then might trigger the Subpart CC requirements? Also note that a significant amount of hazardous waste is 'recontainerized' (e.g., from tanker trucks to 55-gallon drums) as part of the hazardous waste treatment within the WPB. Please clarify this within the Introduction.

Section 12.1 has been revised and stipulates that wastes containing VOAs, VOCs, and SVOCs are not processed on-site in the WPB. Only waste containing characteristic metals are treated on-site.

b. Table 12-1 "Summary of Primary Activities and Estimated Emissions." *This table has no information regarding 'potential air emissions', etc. with regard to the HW treatment tank. Please complete this table with information or add a footnote explaining why the fields are 'blank'.*

Table 12.1 has been revised to include information regarding potential air emissions from the HW treatment tank.

c. Section 12.2—Description of Operations. *Include Listed Waste/K062*.

40 CFR 261.30 indicates the basis for listing the classes and types of wastes listed in 40 CFR 261 Subpart D and was used as the guide for the waste characterization types identified in Section 12.2.

d. Section 12.4 – Containers. *Revise the sentence "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." Add a section for the hazardous waste treatment tank and the stabilization process.*

Section 12.4.4 was revised accordingly. Section 12.4.5 has been added addressing the hazardous waste treatment and stabilization process.

12. **Section 13 – Exposure Information**. A teleconference was held on Thursday, June 23, 2016 during which time questions were asked of EQ and their subcontractors; a revised version of the Offsite Consequence Analysis (OCA) model results was delivered on Friday, June 24, 2016. Please include the revised OCA in your response. The report is entitled "2016 RMP Modeling Final Report, Toxic Worst-Case Release Scenarios, EQ Florida Inc." dated April 8, 2016 and revised June 23, 2016.

    The revised version of the Offsite Consequence Analysis (OCA) model has been included.

13. **Construction and Operation Permit Application, Volume 2 of 3 (May 13, 2016)**. There are still a couple of items that need clarification.
    a. Appendix B: Summary of Permitted EPA Hazardous Waste Codes.
        i. *Revise the Process Code T21 table to clarify that "D" Characteristic Wastes to be treated will only include "D002 and D004 through D011"*.

            Appendix B: Summary of Permitted EPA Hazardous Waste Codes revised accordingly.

        ii. *It is noted that T21 (chemical fixation) treatment code is listed and refers to the stabilization/solidification (S/S) of characteristic wastes. Does the treatment code vary for the K062 wastes?*

            No, the T21 treatment code is applicable for the stabilization/solidification (S/S) of K062 waste.

        iii. *As in Comment 1 above: Hazardous Waste Code K062 associated with Process Code T21 is showing an Annual Quantity of 10,000 gallons of "actual waste processed in 2015" (Footnote 2). It is our understanding that K062 waste has not been permitted for treatment to date at EQ. Please clarify on the application form Part A, and also the form in Appendix B, Volume 2 of 3.*

            A footnote has been added indicating that the annual quantity is a proposed estimated volume.

b. Appendix J: Waste Analysis Plan Documentation & EQFL SOPs.

i. Revise the Hazardous Waste Treatment SOP (OPS-OP-071-FLA), Page 2 of 8, to also include "proposed K062" in the listed of hazardous waste codes permitted for treatment.

The Hazardous Waste Treatment SOP (OPS-OP-071-FLA) has been revised accordingly.

ii. Amend the Crack/Gap Program SOP (OPS-OP-078-FLA) to indicate when this program will begin.

The Crack/Gap Program SOP (OPS-OP-078-FLA) has been revised and indicates that the program will be implemented upon issuance of the permit modification.

14. **Appendix J. Waste Analysis Plan Documentation & EQFL SOPs**.

a. Ensure that the Hazardous Waste Treatment SOP (OPS-OP-071-FLA) includes a detailed procedure to verify confirmation of laboratory analytical results, especially for UHCs and 'listed' wastes.

Section 6.1 of the SOP has been revised and includes a detailed procedure to verify confirmation of laboratory analytical results, especially for UHCs and 'listed' wastes.

b. Section 1.1 and 1.2—General. On Page 2 of 8 of this SOP, it appears that the proposed waste code K062 is missing.

K062 has been added to Section 1.1 and 1.2.

c. Section 6.1 and 6.3—Treatment Verification.

ii. Page 7 of 8, Section 6.1 documents how the 'characteristic' waste is verified, but does not mention how the 'listed' wastes (K062) will be verified.

The Hazardous Waste Treatment SOP (OPS-OP-071-FLA) has been revised and K062 has been added to Section 6.1.

iii. Page 7 of 8, Section 6.3 indicates that when both the TCLP and the UTS have been met, the treated hazardous waste "is now identified as Treated Non-Hazardous Waste". Please confirm

your understanding of the 'listed' waste K062, and how it will be classified and disposed after treatment.

The Hazardous Waste Treatment SOP (OPS-OP-071-FLA) has been revised and Section 6.3 describes how 'listed' waste K062 will be classified and disposed after treatment.

VOLUME 1 OF 3

Permit Modification Application

FOR

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

AT

7202 East 8th Avenue
Tampa, FL 33619

Permit No.: 34875-HO-011

EQ Florida, Inc.
7202 East 8th Avenue
Tampa, FL 33619

Revision: 02
July 29, 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 (city) FL (state) 33619 (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 (city) FL (state) 33619 (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 (city) FL (state) 33619 (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 (city) FL (state) 33619 (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 QUANITY 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 (city) FL (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	☐ Yes	☒ No
surface impoundment	☐ Yes	☒ No
land farm	☐ Yes	☒ No
waste pile	☐ Yes	☒ No
incinerator	☐ Yes	☒ No
storage tank	☐ Yes	☒ No
container storage area	☒ Yes	☐ No
injection wells	☐ Yes	☒ No
wastewater treatment units	☐ Yes	☒ No
transfer station	☒ Yes	☐ No
waste recycling operations	☒ Yes	☐ No
land treatment facility	☐ Yes	☒ No
boiler/industrial furnace	☐ Yes	☒ No
other (units not listed above)	☒ Yes	☐ 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**

DEP Form 62-730.900(2)(d), incorporated in Rule 62-730.220(2)(a), F.A.C., Effective Date 4-23-13

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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.

For Modification Only

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)

8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

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: FLD981932494

Please use the instructions document to complete this form

1. Reason for Submittal (all submitters must complete pages 1 and 2 and sign page 5. Pages 3 and 4, - complete as applicable)

Mark 'X' in the correct box: (must choose one if a notification)

- ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, used oil activities, or PCW activities).
- ■ To provide subsequent notification (to update status and facility identification information).
- ☐ To provide the final notification (closing) for the facility. (see instructions—must complete pages 1,2,5)

FL Registration(s) ■ UW Mercury (see page 3) ■ HW Transporter (see page 4) ■ Used Oil (see page 4)

2. Facility or Business Name

EQ Florida, Inc.

3. Facility Operator (List additional Operators in the comments section).

Name of Operator: EQ Florida, Inc.

Date became Operator: 02 / 02 / 04

Street or P.O. Box: 7202 East 8th Avenue

Phone Number: 813-319-3423

City or Town: Tampa | State: FL | Zip Code: 33619 | Country (if not USA):

Operator Type: ■ Private ☐ Federal ☐ Municipal ☐ State ☐ County ☐ Other

4. Facility Physical Location Information (No P.O. Boxes)

☐ Same address as #3 above or:

Physical Street Address: 2002 North Orient Road ☐ Vessel

City or Town: Tampa | State: FL | Zip Code: 33619

County: Hillsborough | Country (if not USA):

5. Facility North American Industry Classification System (NAICS) Code(s) (at least 5 digits)

A. 562211 (required) B. 562111

C. 562219 D. 562112

6. Facility or Business Mailing Address

■ Same address as # 3 above or: Street or P.O. Box:

City or Town: | State: | Zip/Postal Code: | Country (if not USA):

7. Facility or Business RCRA Contact Person

First Name: Stuart | Last Name: Stapleton | Title: EHS Manager

Phone Number: 813-319-3423 | Extension: | E-Mail: stuart.stapleton@usecology.com | Fax: 813-626-7451

■ Same address as # 3 above or:

Street or P.O. Box:

City or Town: | State: | Zip Code: | Country (if not USA):

8. Real Property (FL Land) Owner of the Facility's Physical Location (List additional owners in the comments section.)

Name of Owner: EQ Holdings, Inc.

Date became Owner: 02 / 02 / 04 ☐ New Owner mm dd yy

Street or P.O. Box: | Phone Number:

City or Town: | State: | Zip Code: | Country (if not USA):

■ Same address as # 3 above or:

Owner Type: ■ Private ☐ Federal ☐ Municipal ☐ State ☐ County ☐ 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

RCRA Hazardous Waste Status Notification or Out of Business Notification | EPA ID No. FLD981932494

9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):

(A) (1)Generator of Hazardous Waste

■ Yes ☐ No (Do not include Universal Waste or Used Oil)

If YES, Choose only one of the following three categories.

■ **a. Large Quantity Generator (LQG):** 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)

☐ **b. Small Quantity Generator (SQG):** 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)

☐ **c. Conditionally Exempt SQG (CESQG):** 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.

☐ d. Short-Term Generator (one-time, not on-going)
☐ e. Episodic: Not more than one-time per year: __SQG__LQG
■ f. United States Importer of hazardous waste
☐ g. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 7, mark 'X' in all that apply.

(2) Treater, Storer, or Disposer of Hazardous Waste (at your facility) Note: A hazardous waste permit may be required for this activity.

■ a. Operating Commercial TSD
☐ b. Operating Non-Commercial TSD
☐ c. Non-Operating: Postclosure or Corrective Action Permit or Order (HSWA, etc.)

(3) ☐ Recycler of Hazardous Waste (at your facility)
Specify: ☐ Commercial ☐ Non-Commercial.
Note: A permit is required for storage prior to recycling.

(4) ☐ Exempt Boiler and/or Industrial Furnace
☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining Furnace Exemption

(5) ☐ Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities
Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.

(6) ☐ Receives Hazardous Waste from Off-Site

(7) ☐ Underground Injection Control

10. Waste Codes for Federally Regulated Hazardous Wastes: 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.

1 D001	2 D002	3 D003	4 D004	5 D005	6 D006	7 D007
8 D008	9 D009	10 D010	11 D011	12 D012	13 D013	14 D014
15 D015	16 D016	17 D017	18 D018	19 D019	20 D020	21 D021

11. Other Status Changes (If no longer handling waste or closed, sections 9 and 10 should be blank and skip Section 12-16):

(A) Non-Handler of Regulated Waste at This Facility (Sections 9, 10 and 12-16 should be blank.)

☐ (1) Business no longer generates, transports, treats, stores, disposes of, or otherwise handles any regulated waste.

(B) Facility Closed (Complete this section only if all business activities at this facility have ceased.)

☐ (1) Closed at this location and moved or moving to another - Submit a new Form 8700-12FL for the new location if you will

☐ (2) Out of Business - Business closed on _____ (date)

☐ **(C) Property Tax Default** | ☐ **(D) Petition for Bankruptcy Protection**

12-14 — Registration Activities Contact Information (only if this submission is a registration or registration information update):

■ Same as Facility RCRA Contact on page 1 or enter:

Contact for:
■ HW Transporter
■ Used Oil Handler
■ Universal Waste

First Name:	Last Name:	Title:
Phone Number:	Extension:	E-Mail:
Street or P.O. Box:		
City or Town:	State:(Country):	Zip Code:

Universal Waste Notification and Mercury Transporter/Handler Registration EPA ID No. FLD981932494

12. Universal Waste (UW) Activities (Mark 'X' and complete all that apply) :

A. Federal Notification

☐ **Federally Defined Large Quantity Handler (LQH) = Generate/Accumulate: 5,000 kg (11,000 lb) or more of any combination of UW accumulated (at any one time)**

Accumulates: ☐ **a. UW Batteries** ☐ **b. Pesticides** ☐ **c. Pharmaceuticals** ☐ **d. Mercury Containing Devices** ☐ **e. Mercury Containing Lamps**

☐ **Destination Facility for UW** Note: For this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.

B. Florida Universal Pharmaceutical Waste (UPW): one-time registration

☐ Pharmaceuticals **LQH** = 5,000 kg or more of Universal Pharmaceutical Waste (UPW) accumulated (at any one time)

☐ Pharmaceuticals **Acute LQH** = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste (UPW) accumulated

☐ **Reverse Distributor** of Universal Pharmaceutical Waste (UPW) (must be registered with the Florida Department of Health [DOH])

C. Florida Annual Mercury Handler Registration:

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).

If you only generate lamps and/or devices or manage pharmaceuticals, do not register or complete the information below.

(1) This form is being submitted as a Florida Registration of Universal Waste Transporter/Handler for-hire Activities

☐ First time registering ☐ Renewal ☐ One-time $1,000 fee for Mercury for-hire first time LQH registration is attached

☐ For-hire **Transporter** of Universal Waste Mercury-Containing Lamps or Devices ☐ For-hire **Transfer Facility** of Universal Waste Mercury-Containing Lamps or Devices ☐ Mercury-Containing Devices (thermostats, etc) **SQH** = less than 100 kg accumulated by for-hire handler ☐ Mercury-Containing Lamps **SQH** = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler	Annual Registration Required
☐ Mercury-Containing Devices **LQH** = 100 kg (220 lb) or more accumulated at any one time by for-hire handler ☐ Mercury-Containing Lamps **LQH** = 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)
(2) Mercury Recovery and/or Reclamation Facility (A hazardous waste permit is required for this activity) ☐ First time registering ☐ Renewal	Annual Registration Required

Briefly Describe your Universal Waste Activities: ☐ We use Drum Top Bulb Crusher(s).

Hazardous waste TSDF. Material is collected from the generator, received at the facility, then sent off-site for recycling.

13. Other State Regulated Waste Activities: **Petroleum Contact Water (PCW)** ☐ **Recovery** ☐ **Transport** [62-740 F.A.C.]

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)]

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

Hazardous Waste and Used Oil Transporter Registrations | EPA ID No. FLD981932494

14. HW Transporter Activities: (Mark 'X' and complete all that apply if you need to register your HW Transporter activities)

Transporters of and Transfer Facilities for Hazardous Waste in the State of Florida are required to register and annually renew their registration. 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.

Generators of hazardous waste who transport waste only within the boundaries of their facility should not register.

A. HW Transporter Registration Information (must be completed annually and when this information changes)

This facility is a registered transporter of hazardous waste.

This form is: ☐ **Initial Registration** ■ **Renewal** ☐ **Notification of changes** ☐ **Cancel Registration**

☐ 1. For own waste only ☐ 2. For commercial purposes ☐ 3. Both commercial and own waste

4. **Transportation Mode** ☐ Air ☐ Rail ■ Highway ☐ Water ☐ Other - specify _____

B. HW Transfer Facility Registration Information (must be completed annually and when this information changes)

■ **This facility is a Hazardous Waste Transfer Facility:** (at this location) Storage Volume _____

This form is: ☐ **Initial Registration** ■ **Renewal** ☐ **Notification of changes** ☐ **Cancel Registration**

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.

The Transfer Facility records required under the provisions of Rule 62-730.171(6) , F.A.C., are kept at (check one):
☐ Our mailing (business) address ■ The site (facility) address

Please enter the EPA ID Number of the HW Transporter who carries the insurance for this Transfer Facility: F L D 9 8 1 9 3 2 4 9 4

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.)];

15. Used Oil and Oil Filter Activities: : (Mark 'X' and complete all that apply if you need to register your used oil activities),

Transporters (exemptions in 40 CFR 279.40(a)(1-4) , transfer facilities, processors, off-specification burners, and/or marketers must annually register with the Department using this form. All except Florida used oil (UO) Processors and collection centers must pay an annual $100 registration fee.

This form is: ☐ **Initial Registration** ■ **Renewal** ☐ **Notification of changes** ☐ **Cancel Registration**

■ If applicable, a check or money order, in the amount of $100, payable to Florida Department of Environmental Protection is enclosed.

(1) Used Oil Transporter - mark activities: (occurring in Florida)
- ■ a. Transporter (off-site) and noncontiguous locations
- ■ b. Transfer Facility

(2) ☐ Collection Center (From businesses, no more than 55 gal per shipment)

(3) ☐ Used Oil Processor (A permit is required.)

(4) ☐ Off-Specification Used Oil Burner

(5) Used Oil Fuel Marketer ☐ On-Spec ☐ Off-Spec

(6) Used Oil Filter Management (must annually register)
- ■ a. Transporter
- ■ b. Transfer Facility
- ☐ c. Processor (Annual Report Required)
- ☐ d. End User

(7) The records required under the provisions of Rule 62-710.510, FAC, are kept at (check one):
☐ Our mailing (business) address ■ The site (facility) address

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.

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

Transfer Facility and Used Oil Transporter requirements and required signature page	EPA ID No. FLD981932494

(14 cont.) Hazardous Waste Transfer Facilities: 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.)] :

__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.]

__Evidence of the transporter's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]

__A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]

__A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]

__A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]

__A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]

(15 cont.) Used Oil Transporters: (Exemptions in 40 CFR 279.40(a)(1-4))

In addition to the requirements on Page 4 Section 15:

- ALL registered UO Handlers must submit an annual report except generators transporting UO from noncontiguous operations within their own company.
- UO transporters transporting off-site over public highways only within their own company must submit proof of insurance.
- 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.).

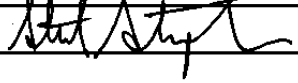
■ The used oil annual report is attached ■ Evidence of Liability Insurance pursuant to 62-710.600(2)(e)., F.A.C. is attached.

16. Comments (attach a page if more space is needed):

See Attachment 1 for additional EPA Waste Codes.

17. Certification: 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.

■ **I certify as a Used Oil Transporter** 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..

Signature of owner, operator, or an authorized representative	Print Name and Title	Used Oil	Date Signed (mm-dd-yyyy)
	Stuart Stapleton	■	05/13/2016
		❑	
		❑	

If the person that filled in this form is not the Facility Contact or Operator, please complete the information below:

(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						

US ecology

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,

Simon Bell
Executive Vice President
Operations and Environmental Services

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. CHECK BACKGROUND CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM.

ComericA Bank

CASHIER'S CHECK

000957069 89 720

NOTICE TO CUSTOMERS: The purchase of an indemnity bond will be required before any cashier's check issued by this bank will be replaced or refunded in the event it is lost, stolen, or destroyed.

DATE 12/04/15

PAY TO THE ORDER OF FLORIDA DEPT OF ENV PROTECTION

$ ******10,000.00

******10,000 DOLLARS AND 00 CENTS Dollars

Details on back

Security Features Included

Drawer: Comerica Bank

Authorized Signature

MP

REMITTER

000957069

00070/29205

"000957069" ⑆072000096⑆ 1852538444"

ComericA Bank

CASHIER'S CHECK

Purchaser's Receipt

NOTICE TO CUSTOMERS: The purchase of an indemnity bond will be required before any cashier's check issued by this bank will be replaced or refunded in the event it is lost, stolen, or destroyed.

000957069 89 720

12/04/15

******10,000 DOLLARS AND 00 CENTS Dollars

******10,000.00

PAY TO THE ORDER OF FLORIDA DEPT OF ENV PROTECTION

Drawer: Comerica Bank

00070/29205 000957069

REMITTER

NON NEGOTIABLE MP

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 through D011) that are currently permitted for treatment within the Waste Processing Building (WPB). K062 is the waste code for 'spent pickle liquor' from steel finishing operations generated by facilities in SIC 331 and 332 Industry Groups - Steel works, blast furnaces, and rolling and finishing mills, as iron and steel foundries. EPA's Office of Solid Waste (OSW) defines "steel finishing operations" as processes which impart desired mechanical and surface characteristics to steel. Reference Section 12 for treatment methods and processes and Appendix J (Volume 2 of 3) for SOP OPS-OP-071-FLA Hazardous Waste Treatment.

2. Deletion of the currently permitted 'staging' of 80 drums/4,400 gallons of waste codes (D002, D004 through D011) and the replacement of a permitted storage area having a total capacity of 80 drums/4,400 gallons of hazardous waste (waste codes D002, D004 thru D011, and K062) storage in the Waste Processing Building (WPB) for up to 365 days. This proposed permitted chemical storage area in the WPB will include containers of 'characteristic' hazardous waste received by EQ as solids, liquids, and sludges. These hazardous 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. This area within the waste processing building complies with 264.175(a) and 264.175(b)(1) thru (b)(5) as described in Section 2.3.4(6) of the permit modification application. This proposed additional capacity shall not be exceeded at any time. Once the hazardous waste chemicals have undergone treatment and solidification (as confirmed by a positive Paint Filter Test (PFT) result), additional hazardous waste chemicals may be unloaded into the permitted area to await treatment. Should the treatment batch within the tank result in a negative (failed) PFT, no additional drums or containers will be unloaded into the WPB until such time as the PFT has confirmed that only solids exist within the tank. At this point, the treated materials can be offloaded into roll-offs and counted against the 800 CY capacity of the Bulk Container Storage Areas (BCSAs). See Bullet 3 below. 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. Reference Section 12 for treatment methods and processes and Appendix J (Volume 2 of 3) for SOP OPS-OP-071-FLA Hazardous Waste Treatment.

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 'lime-stabilized K062' hazardous waste material storage within the footprint of the asphalt-covered parking lot located on the south side of E. 9th 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. 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).

6. 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

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

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

NOTES:
1 – Container Storage Building, Improved Secondary Containment Area and Inbound/Outbound Staging Area
2 – Waste Processing Building
3 – Bulk Container Storage Areas
4 – The proposed permitted storage area replaces the currently allowed staging of a maximum of 80 drums/4,400 gallons. If permitted, the WPB will have a total hazardous waste storage capacity of 4,400 gallons.

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 8th 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. 8th 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. 8th 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 9th Avenue, Tampa, Florida.

The northern parcel (**Figures 13 and 14**) consists of the 5,866 square foot (ft^2), 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, 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 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. 8th 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. 8th 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. 8th 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.

   The 8,050 sq. ft. Waste Processing Building has a total storage capacity of 173,532 gallons and complies with 264.175(a) and 264.175(b)(1) through (b)(5). The entire WPB is surrounded by a concrete curb.). The concrete 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.

In order to separate the hazardous waste operations from the solid waste operations, a 12-in wide bright yellow line delineates 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 yellow line encompasses the perimeter of the reactives magazine.

2.3.5 Bulk Container Storage Areas (BCSAs) – Southern Parcel, 7202 E. 8th 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 Cracks and Gaps 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 be 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 (D002 and D004 through D011) and listed hazardous waste (K062, untreated pickle liquor, an acidic material, from SIC codes 331 and 332 only) 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. The first step in the process for all liquid wastes is the neutralization (NEUTR) of D002 acidic or alkaline materials. Treatment of characteristic waste (D002 and D004 through D011) must meet 40 CFR 268.40 and Underlying Hazardous Constituents (UHCs), if required. Additionally, when wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue must meet the lowest treatment standard for the constituent of concern. See Section 4.8 of the Waste Analysis Plan for additional details. 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 eliminating 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 (neutralized) and then 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. The resulting mixture is of a homogenous consistency. 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 treated waste is physically solid and no longer retains hazardous characteristics. 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.

Reference Volume 2 of 3 Section J, Hazardous Waste Treatment OPS-OP-071-FLA, for additional detail.

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 reactives 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 reactives magazine is contained in Appendix I (Volume 2 of 3).

The reactives 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 reactives magazine area. Once moved to the reactives 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 reactives 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, 231.32, 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 (HW) Management

EQ manages a significant quantity of Household (Hazardous) Waste (HW). The HW is solid waste which is not hazardous waste as defined in 40 CFR 261.4 (b) 1). The HW is regulated under Subtitle D regulations which (by definition) do not apply to this permit. The inclusion of HW information is for informational purposes only. EQ exceeds all applicable regulations for HW Management. Nearly all HW 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 HW shipments. Other permit requirements such

as training, inspections, and contingency are typically adhered to by EQ for the management of HW. The management of HW is included in EQ facility, containment, closure, and financial assurance calculations. Management of HW 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 and are included as part of the total CSB inventory. 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 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)[1]

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) [1]

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) [1]

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) [1]

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) [1]

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.

Toxic Waste (T) [1]

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.

1/ 40 CFR 261.30 indicates the basis for listing the classes or types of wastes listed in 40 CFR 261 Subpart D.

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

Material	Method	Equipment	Sample Container
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)	Coliwasa or tubing (b) or sampling rod	Plastic/Glass jar w/screw top

NOTES:
(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 Coliwasa, 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 of 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. Reference Volume 2 of 3 Section J, Hazardous Waste Treatment OPS-OP-071-FLA, for additional detail.

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). Treatment of characteristic waste (D002 and D004 through D011) and listed waste (K062) must meet 40 CFR 268.40 and Underlying Hazardous Constituents (UHCs), if required. Additionally, when wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue must meet the lowest treatment standard for the constituent of concern.

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. 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[1]	Antimony	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
UHCs[1]	Beryllium	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
UHCs[1]	Nickel	EPA 6010	EPA 3010	EPA 1311	EPA 9095B
UHCs[1]	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_20
    - 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 Lab Packs

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).

Lab packs from Household Hazardous Waste (HHW) collection sites consist primarily of paints and paint related material. Other household waste includes cleaners, pool chemicals, pesticides, and lawn chemicals. HHW lab packs may be EQ packed or be "customer" (generator) packed. HHW 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 HHW 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, Na3 PO4, 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: _____ Inspector: _____
Time: _____ 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

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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: _____ Inspector: _____
Time: _____ 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		

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

Date: _____ Inspector: _____
Time: _____ 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
Total WPB Inventory =	**0**

BCS Inventory	Cubic Yards
Hazardous Waste	0
Non-Hazardous Waste	0
Total BCS Inventory =	**0**

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 handing 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 able 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 8th 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 8th 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 8th 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 8th 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 8th 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 8th 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 8th 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 TSDF 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.

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, and universal 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
Inventory Totals (Gallons)	**50,000 Gallons**	**20,000 Gallons**	**4,400 Gallons**	**0 Gallons**	**74,400 Gallons**
Inventory Totals (Cubic Yards)	**0 Cubic Yards**	**0 Cubic Yards**	**0 Cubic Yards**	**800 Cubic Yards**	**800 Cubic Yards**

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 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 thirty (30) 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, and Universal 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) days.

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.

9.5.3 Decontamination

The EQ Container Storage Building (CSB) is totally enclosed. The CSB construction is poured 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 four (4) locations around the CSB as follows:

1. One (1) 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.;
2. One (1) soil sample will be collected up gradient from the northeast corner of the CSB;
3. One (1) soil sample will be collected down gradient from the southeast corner of the CSB; and
4. One (1) soil sample will be collected from under the CSB.

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.

The EQ Waste Processing Building (WPB) is partially enclosed with corrugated metal panels. The WPB floor is constructed of poured concrete providing containment. All loading and unloading is conducted within sloped and diked containment.

Soil sampling will be performed at four (4) locations around the WPB as follows:

1. One (1) soil sample will be taken from the stormwater retention pond (SWMU 15). Unless there is direct knowledge or evidence that a release occurred from the container storage area into SWMU#15, 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.;
2. One (1) soil sample will be collected up gradient from the northeast corner of the WPB;
3. One (1) soil sample will be collected down gradient from the southeast corner of the WPB; and
4. One (1) soil sample will be collected from under the WPB.

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. A minimum of four (4) 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.

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.

Analysis includes full TCLP, 624, 8240, and 8260 for the eight (8) collected soil samples and the four (4) collected rinse water samples. This covers all characteristic waste as well as many solvents.

9.6 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: Occurs after all wastes are shipped to off-site disposal facilities.
- 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**

CONTAINER STORAGE BUILDING DECONTAMINATION CLOSURE COST

Item	Quantity	Unit	Rate	Cost
Clean Container Storage Building (CSB) and the Improved Secondary Containment Area (ICSA) 7,672 Sq. Ft. (Floor and Sumps)	34	Hour	$40	$1,360
Clean/Decon Small Equipment, Pumps, Tools, Hand Trucks	4	Hour	$40	$160
Rinsate Analysis	2	Each	$645	$1,290
Rinsate Disposal/Treatment	3836	Gallon	$0.69	$2,647
Misc. Equipment Rental	2	Day	$200	$400
Mobilization and Demobilization	2	Day	$1,850	$3,700
Soil Sample Analysis	4	Each	$645	$2,580
Engineering Inspections, Sampling and Closure Certification	1	Each	$5,000	$5,000
			Subtotal for CSB Decontamination =	**$17,137**

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 4,400 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 and is included closure cost estimate. The only additional cost would be the time to empty the contents of the tank. Rinsate costs are based on the 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 reactives 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 (Treatment Tank)	40	Ton	$87	Ton	$3,476
Other Hazardous Waste (Roll-Offs)	0	Ton	$87	Ton	$0
Treated Non-Hazardous Waste (Roll-Offs)	0	Ton	$23	Ton	$0
				Subtotal For Waste Processing Building =	**$15,898**

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
Clean Reactive Magazine 264 Sq. Ft.(Floor, Roof & Inside)	2	Hour	$40	$80
Clean Waste Processing Building 8,050 Sq. Ft. (Floor and Sumps)	36	Hour	$40	$1,440
Clean/Decon Small Equipment Pumps, Filters, Hand Trucks	4	Hour	$40	$160
Rinsate Analysis	2	Each	$645	$1,290
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
Soil Sample Analysis	4	Each	$645	$2,580
Engineering Inspections, Sampling and Closure Certification	1	Each	$5,000	$5,000
			Subtotal for WPB Decontamination =	**$22,476**

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
				Subtotal For Bulk Container Storage Area =	**$69,520**

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 per Load	Total Cost
Flammable Liquids	201	Drum	3	$2,400	$7,200
Oxidizers	136	Drum	2	$2,400	$4,800
Reactives & Flammable Solids	59	Drum	1	$2,400	$2,400
Poisons	171	Drum	2	$2,400	$4,800
Corrosives - Alkaline	154	Drum	2	$2,700	$5,400
Corrosive - Acid	206	Drum	3	$2,700	$8,100
Other Hazardous Waste (Liquids)	229	Drum	3	$2,700	$8,100
Other Hazardous Waste (Solids)	196	Drum	2	$2,700	$5,400
Other Hazardous Waste (Roll-Offs)	840	Cubic Yards	42	$5,000	$210,000
				Subtotal for Transportation =	**$256,200**

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
Container Storage Building Decon =	$17,137
10-Day Transfer Facility =	$63,571
Waste Processing Building =	$15,898
Bulk Container Storage Area =	$69,520
Waste Processing Building Decon =	$22,476
Transportation =	$256,200
Subtotal =	**$618,760**
Contingency @ 10% =	$61,876
Total Closure Cost =	**$680,636**

9.13 Financial Assurance

Total cost of Closure for the Combined Operations is estimated to be $635,889. 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
Total time required to close facility	***90 Days***

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 Container Storage Building has a containment system designed and built to contain leaks or spills of hazards 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' x 3.5' x 4.5' x 7.48) x 5	5,007
ISCA #1	(46' x 25.41' x 1.16' x 7.48) / 2	5,071
ISCA #2	46' x 19.33' x 0.59' x 7.48	3,924
ISCA Area #3	(46' x 19.33' x 1.16' x 7.48) / 2	3,858
	Total Containment Capacity	***17,860***

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.

10.5.4 Waste Processing Building

The 8,050 square foot covered WPB (**Figure 15**) has a proposed hazardous waste storage capacity of 4,400 gallons. 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. The capacity is consistent with the physical limitations of the WPB The WPB 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. EQ ensures that the proposed permitted hazardous waste storage area within the WPB complies with 264.175(a) and 264.175(b)(1) through (b)(5).

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 WPB, whichever is greater.

10.5.5 Bulk Container Storage Area

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.

10.5.6 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.

10.5.7 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 proposed 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 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.

Waste Characterization Reports are submitted by generators for in-bound shipments. The proper identification of UHCs are the responsibility of the facility and the reports are reviewed to confirm that no organic UHCs are present. Only waste containing characteristic metals are treated on-site. Waste will be treated to meet inorganic constituent concentration UTS's listed in Part 268-Subpart D as required 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[1]	Non-Wastewater UTS/TCLP mg/L [2]	Other Requirements[3]
D002	Corrosive	2 ≥ pH ≥ 12.5	DEACT	PFT
D004	Arsenic	5.0	5.0	PFT
D005	Barium	100.0	21	PFT
D006	Cadmium	1.0	0.11	PFT
D007	Chromium	5.0	0.60	PFT
D008	Lead	5.0	0.75	PFT
D009	Mercury	0.2	0.025	PFT
D010	Selenium[4]	1.0	5.7	PFT
D011	Silver[5]	5.0	0.14	PFT
K062	Chromium	0.60	0.60	PFT
K062	Lead	0.75	0.75	PFT
K062	Nickel	NA	NA	PFT

Notes:

1/ Metals constituents by TCLP (Toxicity Characteristic Leaching Procedure)

2/ If the starting material is a liquid which is solidified/stabilized, there is a change in treatab UTS Concentration would apply. This is not considered impermissible dilution.

3/ EQFL does not intend to dispose of any bulk or noncontainerized treated liquids and will d by analyzing a sample by EPA SW-846 Method 9095B (Paint Filter Test).

4/ Selenium will retain its hazardous characteristics if treated only to meet the non-wastewa to 1. mg/L TCLP or less in order to be decharacterized and meet LDRs.

5/ If silver starting concentration is between 14-50 mg/L, the 90% reduction will meet the 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 through 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, a drum crusher/rag compactor, or transferred from tanker trucks to totes or other containers in the WPB. 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.

Waste Characterization Reports are submitted by generators for in-bound shipments. The reports are reviewed to confirm the chemical nature and characteristics of a waste requiring disposal. The presence of volatile organic aromatics (VOAs), volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCs) are determined as a part of the Waste Characterization Report review. Wastes containing VOAs, VOCs, and SVOCs are not processed on-site in the WPB. Only waste containing characteristic metals are treated on-site.

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.

12.4.5 Hazardous Waste Stabilization/Treatment

EQ does not treat hazardous waste regulated by 40 CFR 264 Subpart BB in the treatment/stabilization tank process 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 $0.1m^3$ - 0.46 m^3 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^3, 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

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	Minimal	HAPs and VHAPs are not present.	NA	NA
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
Recontainerization Operations					
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
				TOTAL =	**3.25**

Table 12-2 Worksheet for Estimating Emissions from Container Sampling

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 (xi*Pi*/Po)	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^3/gmol*K	62,300	Given
T	Temperature, Deg K	305.4	90 deg F
Di	Diffusivity in air, cm^2/s	0.124	Chemical Database
1	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
Equation:	**(2)(Po)(MW)(yi*)(w)(R/T) x ((Di)(l)(U)(3.14)(Fv)) ^0.5**	**0.02 g/s**	**Calculated Emission Factor**
Operating Data:			
Variable	**Descriptions**	**Value**	**Basis**
NC	Number of containers sampled, containers/yr.	1,560	10% of all containers
t	Typical sampling time. Seconds per container	25	Conservative assumption
Equation:	**Calculated Emission Factor x NC x t/454 g/lb.**	**1.72**	**Pounds per year**
	Total Emissions =	**0.0009**	**Tons per year**

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)

Calculation Parameters			
Variable	**Descriptions**	**Value**	**Basis**
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
Equation:	**12.46(S)(P)(M)(T)**	**11.3 lbs/1,000 gal**	**Calculated Emission Factor**
Operating Data:			
Variable	**Descriptions**	**Value**	**Basis**
Q	Quantity loaded (gal/year)	47,850	Pumping or pouring operations
Pct	Amount of solids in waste loaded (percent)	95	Assumption
Equation:	**Calculated emission factor x Q/1,000/2,000 lbs/ton x Pct/100**	**0.26**	**Tons per year**

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 (xi*Pi*/Po)	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^3/gmol*K	62,300	Given
T	Temperature, Deg K	305.4	90 deg F
Di	Diffusivity in air, cm^2/s	0.124	Chemical Database
1	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)(Po)(MW)(yi*)(w)(R/T) x ((Di)(l)(U)(3.14)(Fv)) ^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.

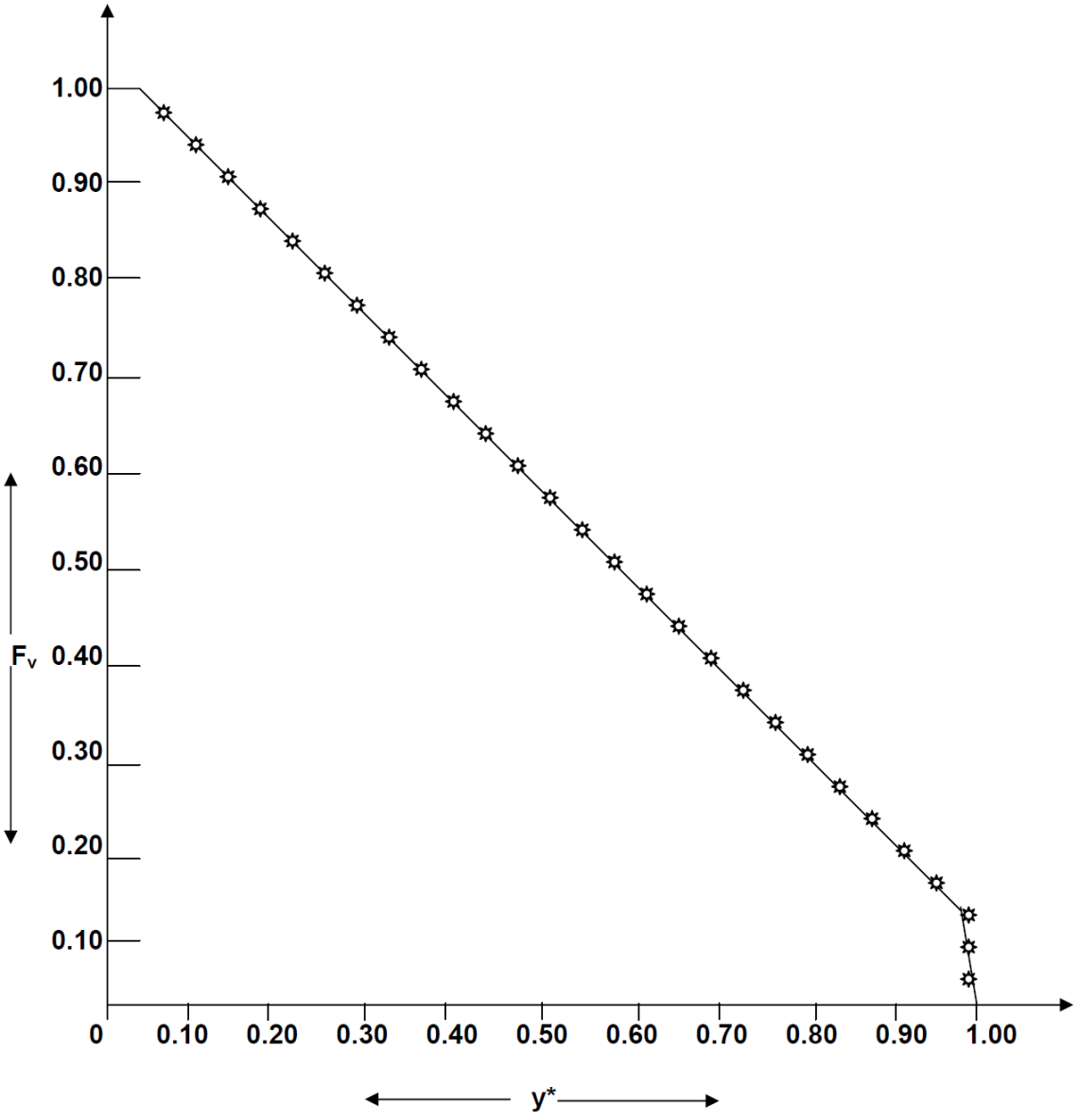
Table 12-5 Worksheet for Estimating Emissions from Tanker Truck Loading

Calculation Parameters			
Variable	**Descriptions**	**Value**	**Basis**
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
Equation:	**12.46(S)(P)(M)(T)**	**11.3 lbs/1,000 gal**	**Calculated Emission Factor**
Operating Data:			
Variable	**Descriptions**	**Value**	**Basis**
Q	Quantity loaded (gal/year)	99,000	Assume 100 drums/tanker; tankers loadedmonth (1/2 acetone)
Pct	Amount of solids in waste loaded (percent)	95	Assumption
Equation:	**Calculated Emission Factor x Q/1,000/2,000 lbs/ton x Pct/100**	**0.57**	**Tons per year**

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 * [31]



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 – revised June 23, 2016

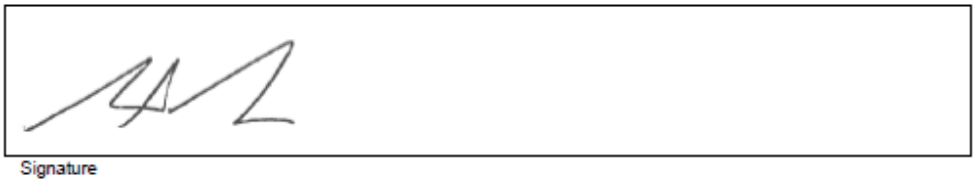
Prepared by:

Koogler & Associates
4014 N.W. 13th Street
Gainesville, FL 32609
www.kooglerassociates.com
Project No. 817_16_02

817_16_02
NOVA Engineering and Environmental, LLC
June 23, 2016

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

1

817_16_02
NOVA Engineering and Environmental, LLC
June 23, 2016

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[1] 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 (see Attachment 1, Building Layout, red highlighted area). 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. A distance of 1250 ft. is the distance to the closest sensitive population, which is a prison. Therefore, RMP toxic endpoints at distances of less than 1250 ft. are considered for this modeling effort to be acceptable.

Table 1. Modeled toxic chemicals

Toxic Chemicals	Weight Fraction	Volume (gal)	Modeling	Toxic Endpoint (ft)
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.[2] 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 does not extend to

sensitive population areas in the vicinity to the facility. 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[3]

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[4] states:

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

3

The toxic endpoint distances were determined as the greatest distance that the toxic endpoint (concentration of chemical in units of µg/m3) 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.[5] 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 demonstrate that the toxic endpoint of any potential release of an RMP chemical, as defined by EPA RMP Program, does not extend beyond a maximum distance of 1050 feet from the location of a chemical release at the facility hazardous waste storage area. This maximum distance

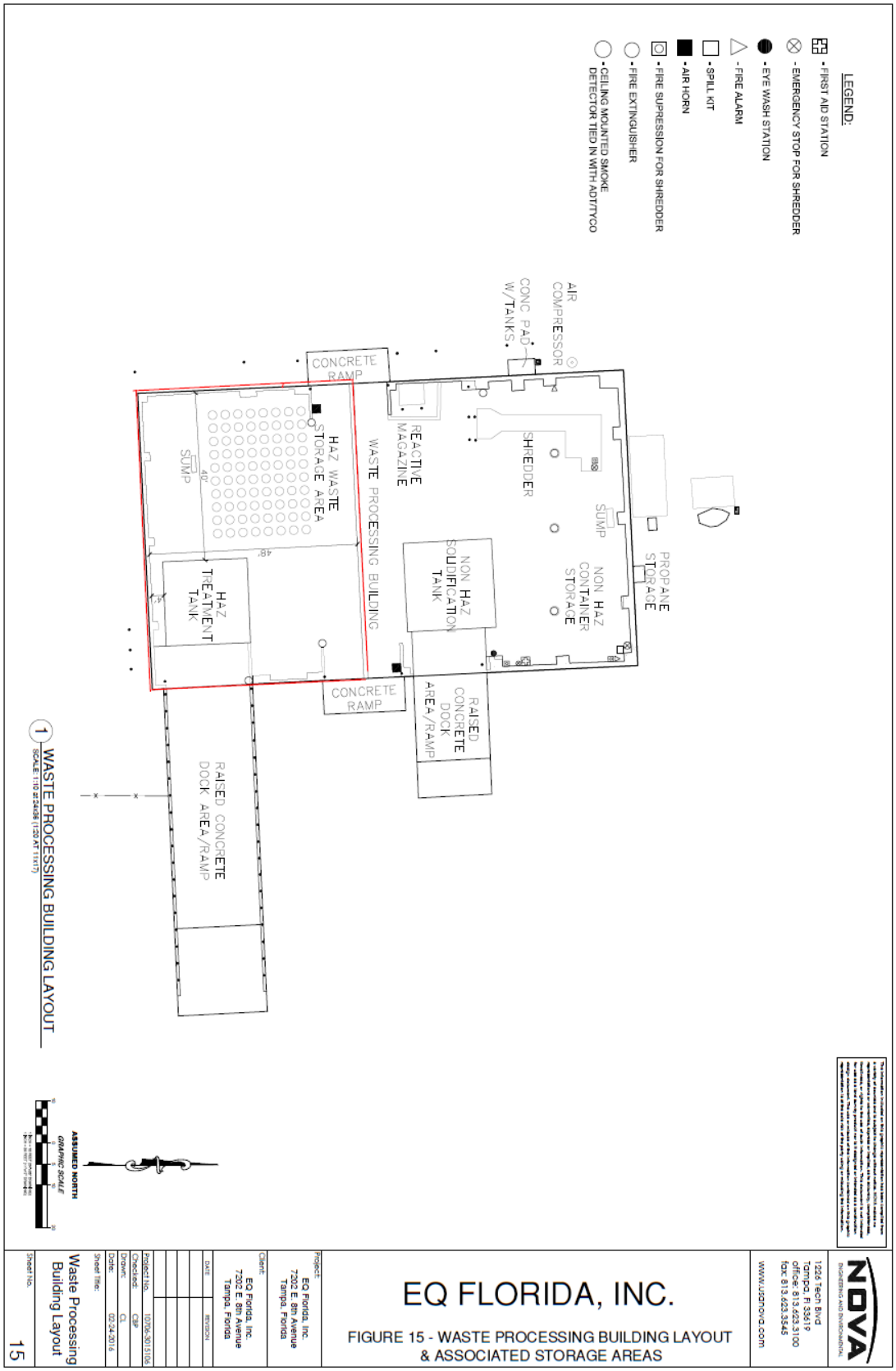
does not reach sensitive populations in the vicinity of the facility. Additional refinement of the modeling parameters would likely reduce toxic endpoints.

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

817_16_02
NOVA Engineering and Environmental, LLC
June 23, 2016

ATTACHMENT 1: BUILDING LAYOUT


LEGEND:
- FIRST AID STATION
- EMERGENCY STOP FOR SHREDDER
- EYE WASH STATION
- FIRE ALARM
- SPILL KIT
- AIR HORN
- FIRE SUPRESSION FOR SHREDDER
- FIRE EXTINGUISHER
- CEILING MOUNTED SMOKE DETECTOR TIED IN WITH ADT/TYCO
AIR COMPRESSOR
CONC PAD W/TANKS
CONCRETE RAMP
HAZ WASTE STORAGE AREA
SUMP
REACTIVE MAGAZINE
WASTE PROCESSING BUILDING
SHREDDER
SUMP
NON HAZ CONTAINER STORAGE
PROPANE STORAGE
NON HAZ SOLIDIFICATION TANK
HAZ TREATMENT TANK
CONCRETE RAMP
RAISED CONCRETE DOCK AREA/RAMP
RAISED CONCRETE DOCK AREA/RAMP
1 WASTE PROCESSING BUILDING LAYOUT
SCALE: 1/10 (FOR 24X36 (1/20 AT 11X17))
ASSUMED NORTH
GRAPHIC SCALE
NOVA
ENGINEERING AND ENVIRONMENTAL
1224 Tech Blvd
Tampa, Fl 33619
office: 813.623.3100
fax: 813.623.3545
www.usnova.com
EQ FLORIDA, INC.
FIGURE 15 - WASTE PROCESSING BUILDING LAYOUT
& ASSOCIATED STORAGE AREAS
Project
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
Client
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
DATE
REVISION
Project No. 10705-3801.5106
Checked CBP
Drawn CL
Date 02-24-2016
Sheet Title:
Waste Processing Building Layout
Sheet No.
15

817_16_02
NOVA Engineering and Environmental, LLC
June 23, 2016

ATTACHMENT 2: MODELING RESULTS

KOOGLER AND ASSOC. 4/8/2016 Endpoints

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	80	262

filename: 8171602F

HCl

RELEASE		endpoint	
gallons	kg	meters	feet
275	1227	260	853

filename: 8171602C

HNO3

RELEASE		endpoint	
gallons	kg	meters	feet
275	1165	320	1050

filename: 8171602B

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

817_16_02_WST_EQ-input file 4/8/2016

ATTACHMENT 2

2016-EQ, RMP Modeling
Koogler Project: 817_16_02
RISK MANAGEMENT PLANNING, OFF-SITE CONSEQUENCE ANALYSIS

CHEMICAL PARAMETERS

HYDROFLUORIC ACID (AQUEOUS)
model file surname: 8171602F
HF, balance of water

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

containment surf area	building mitigation factor
ft2	
NA	0.1

spill w/ mitigation 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 weight	water mol wt.	water amount	comp.	water
	%	kg	kg/kgmol	mol	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 surname: 8171602C
HCl, balance of water

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

containment surf area	building mitigation factor
ft2	
NA	0.1

spill w/ mitigation 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 weight	water mol wt.	water amount	comp.	water
	%	kg	kg/kgmol	mol	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 surname: 8171602B
HNO3, balance of water

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

containment surf area	building mitigation factor
ft2	
NA	0.1

spill w/ mitigation 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 weight	water mol wt.	water amount	comp.	water
	%	kg	kg/kgmol	mol	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 Hgsystem
3 http://webbook.nist.gov/ (for nitric acid at 298 K)
4 use heat of vaporization at 298 K

ATTACHMENT 2

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
HNO3	-6.156	-4.348	13.130	-33.140	309	431	0.717	0.283	101	5.27	4008

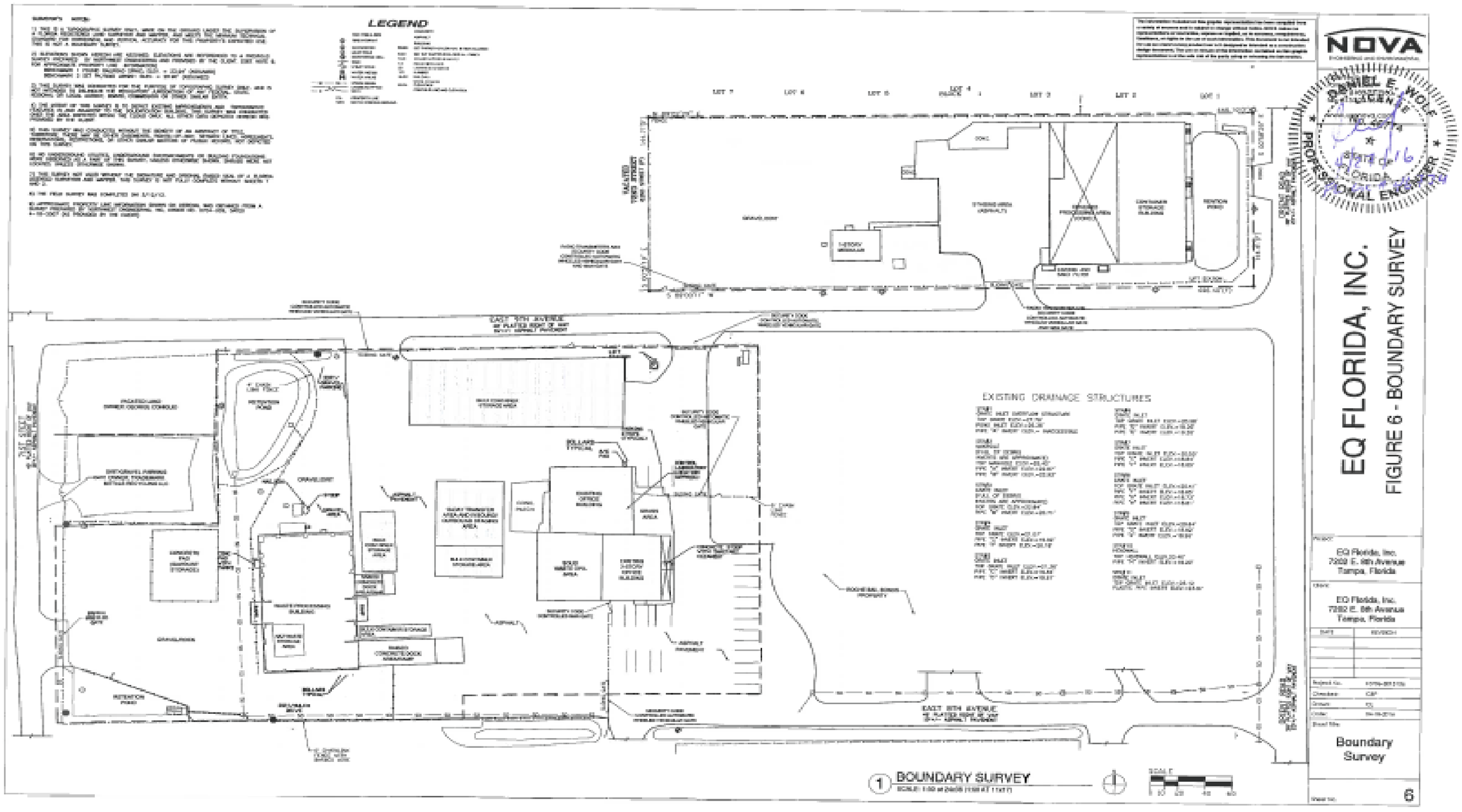
use trend of HF basis for other gases. Trend line similar other than Tc and Pc

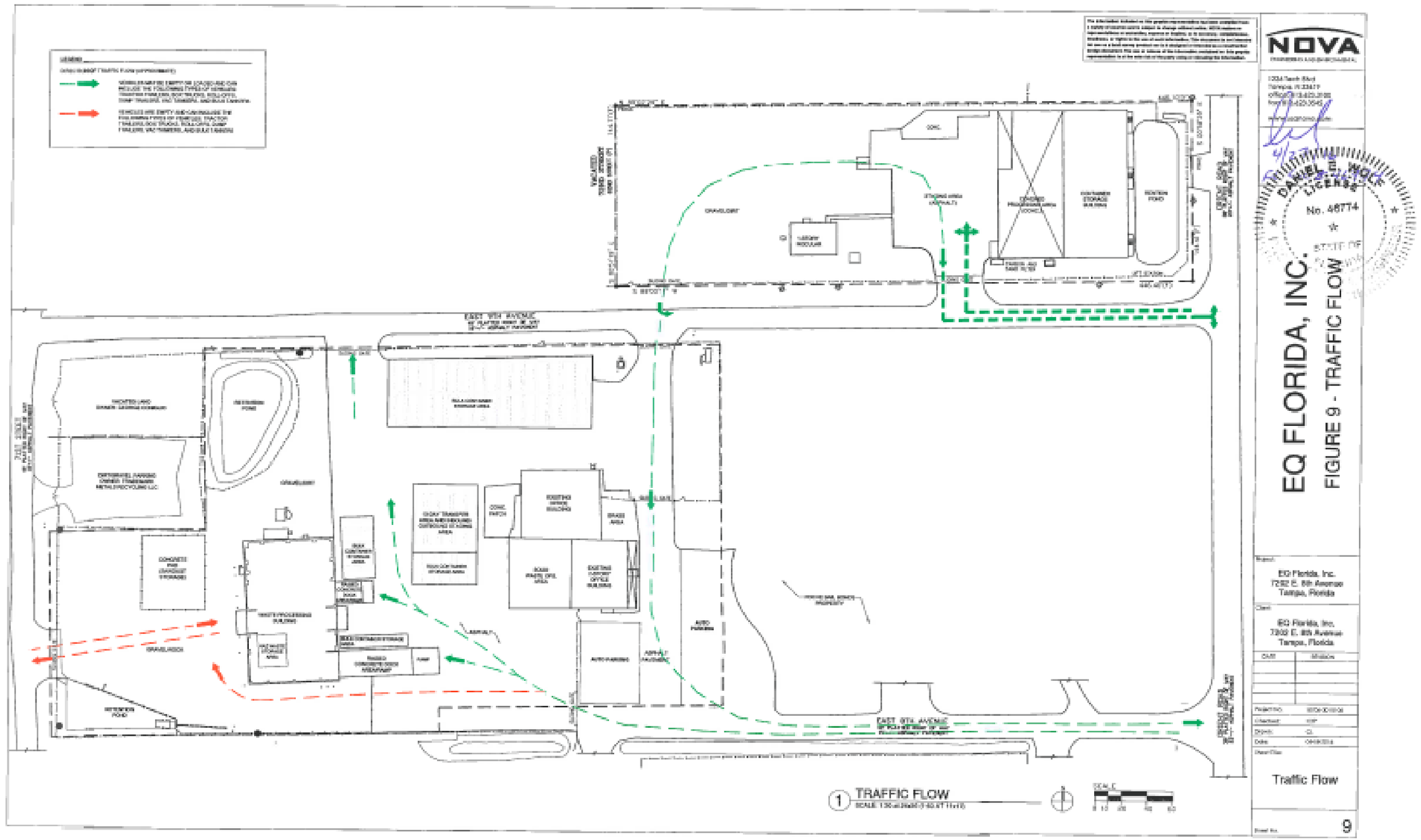
14.0 ITEMS NOT APPLICABLE TO THE PERMIT RENEWAL APPLICATION

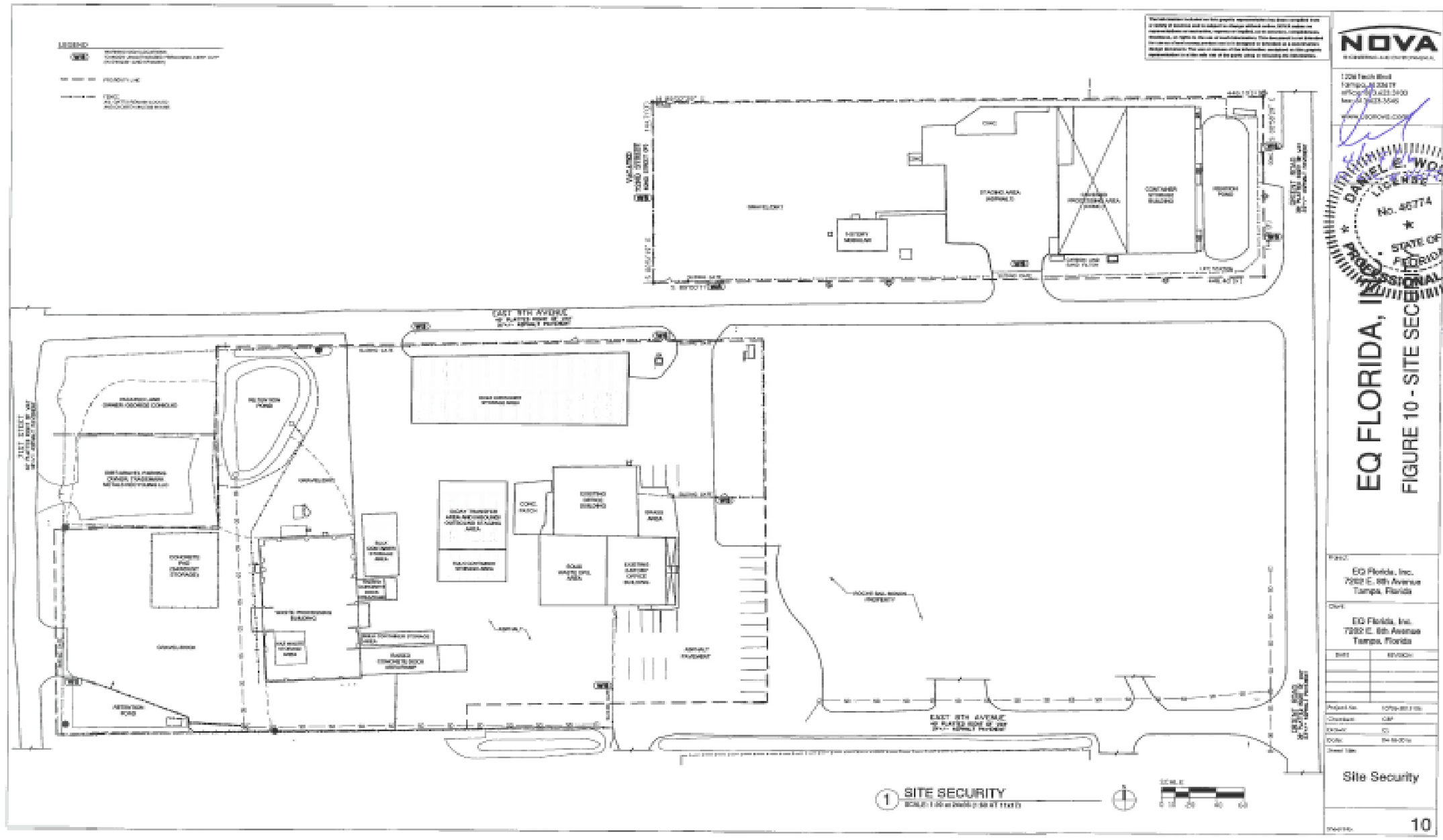
The following items are not applicable to the EQ facility and information pertaining to them is not included in this permit renewal application:

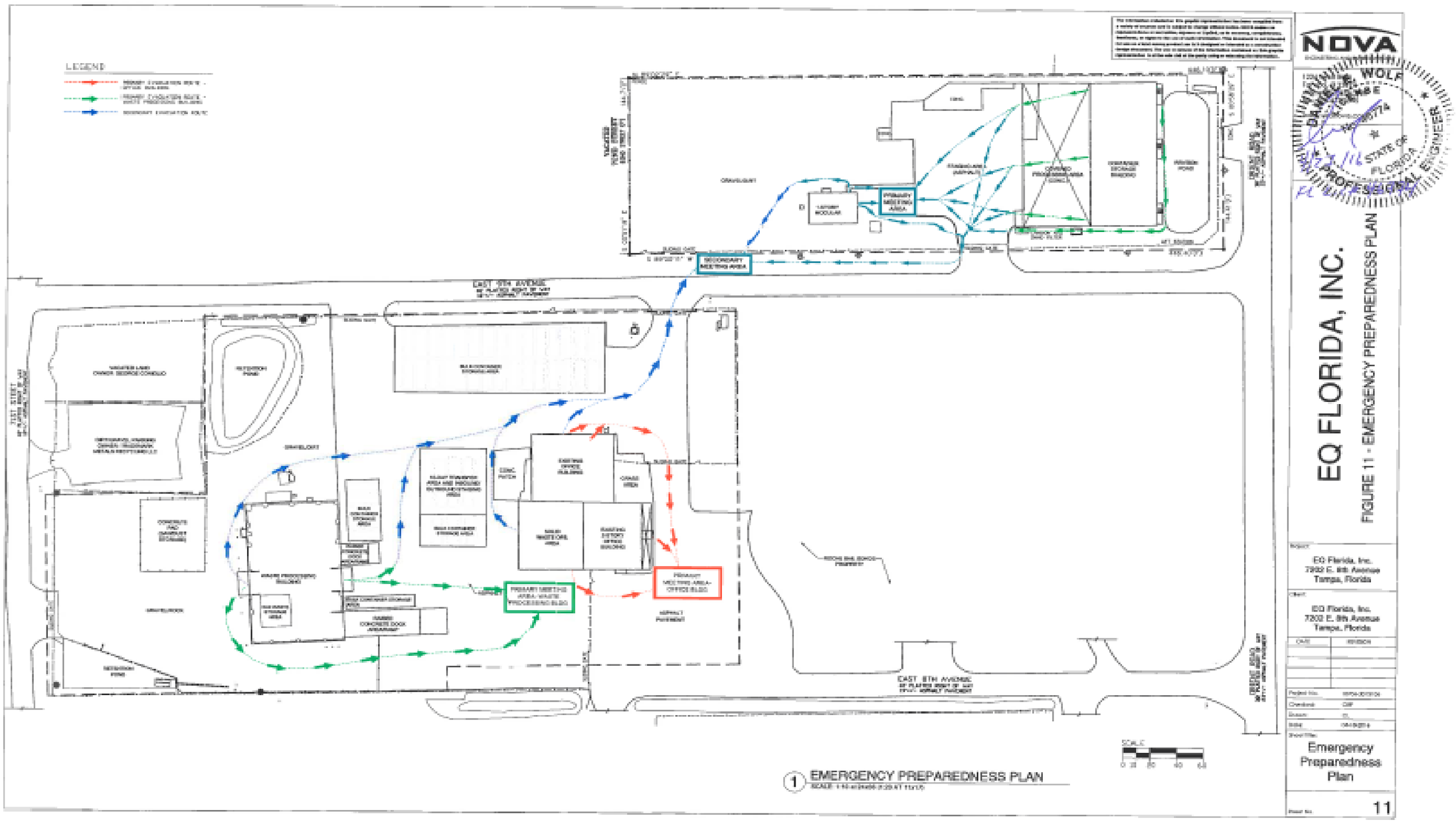
- Surface Impoundments
- Waste Piles
- Land Treatment
- Landfills
- Incinerators
- Compliance Schedule
- Groundwater Protection
- Research, Development, and Demonstration
- Air Emission Standards for Process Vents
- Air Emission Standards for Equipment Leaks
- Boilers and Industrial Furnaces
- Requirements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

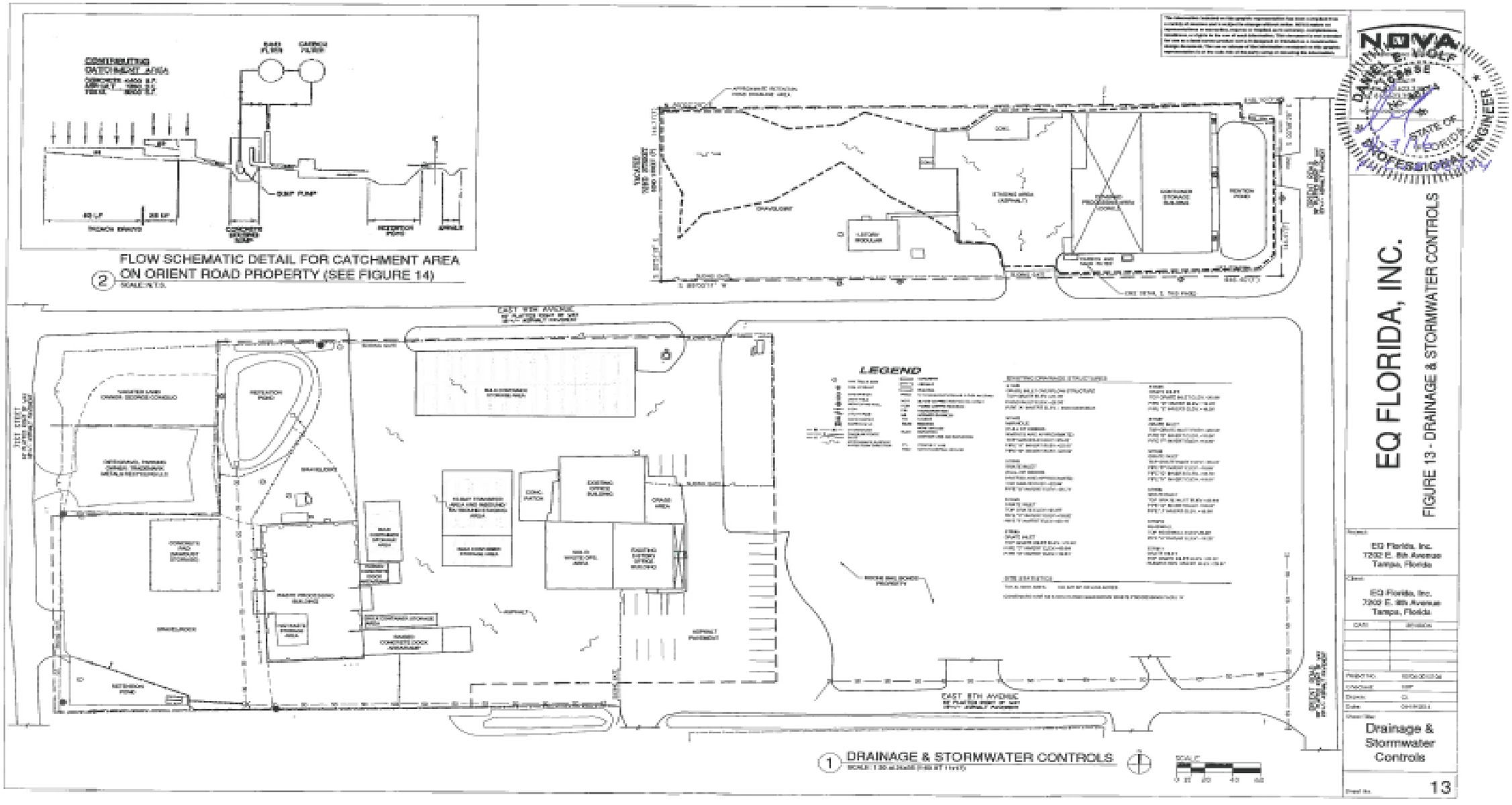
FIGURES

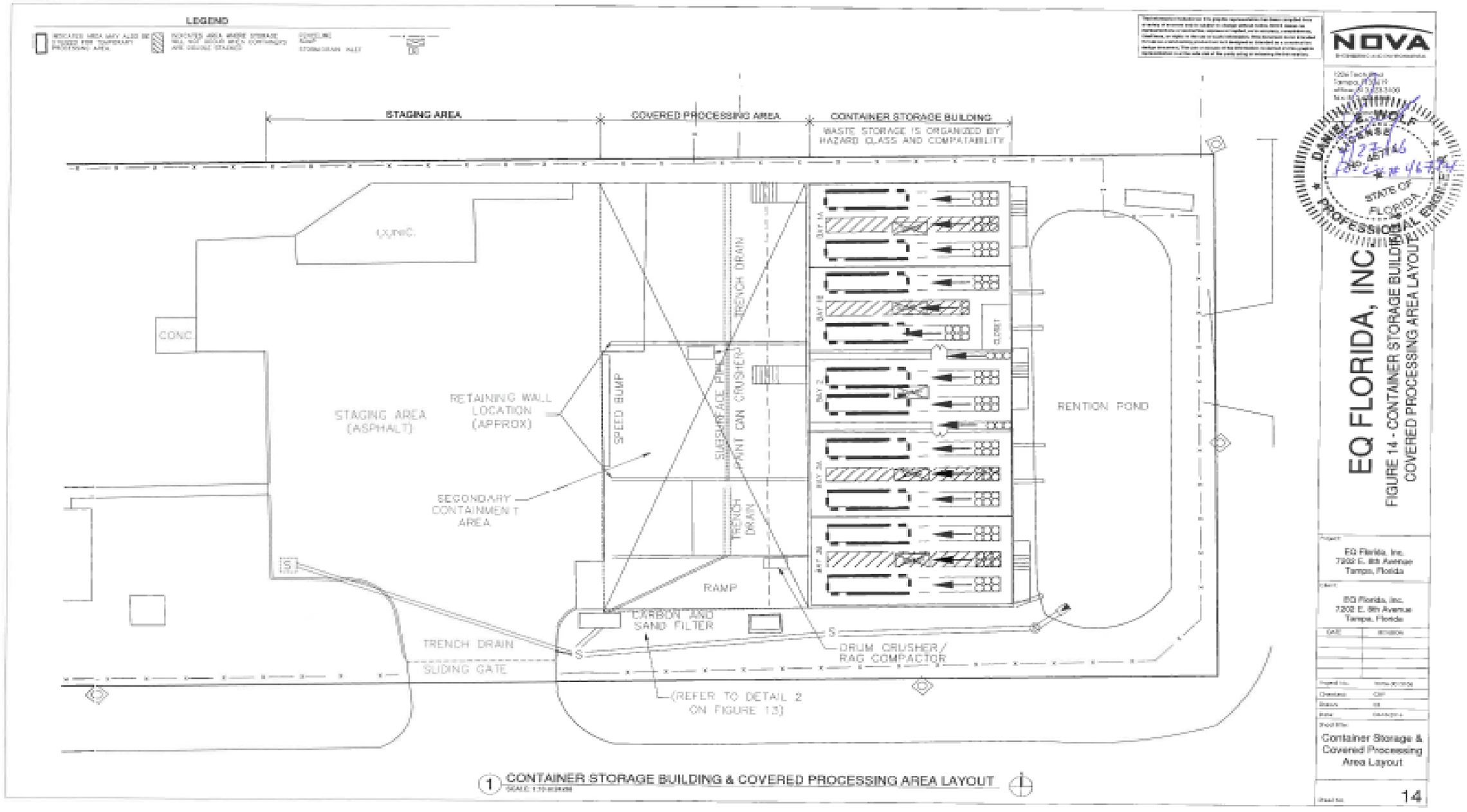

LEGEND
EXISTING DRAINAGE STRUCTURES
EAST 8TH AVENUE
1 BOUNDARY SURVEY
NOVA
DANIEL E. WOLF
PROFESSIONAL ENGINEER
EQ FLORIDA, INC.
FIGURE 6 - BOUNDARY SURVEY
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
Boundary Survey
6


NOVA
EAST 8TH AVENUE
EAST 8TH AVENUE
EQ FLORIDA, INC.
FIGURE 9 - TRAFFIC FLOW
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
Traffic Flow
9
1 TRAFFIC FLOW


LEGEND
EAST 8TH AVENUE
EXIST. 8TH AVENUE
1 SITE SECURITY
NOVA
DANIEL E. WOLF
LICENSE
No. 45774
STATE OF FLORIDA
PROFESSIONAL ENGINEER
EQ FLORIDA, INC.
FIGURE 10 - SITE SECURITY
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
Site Security
10

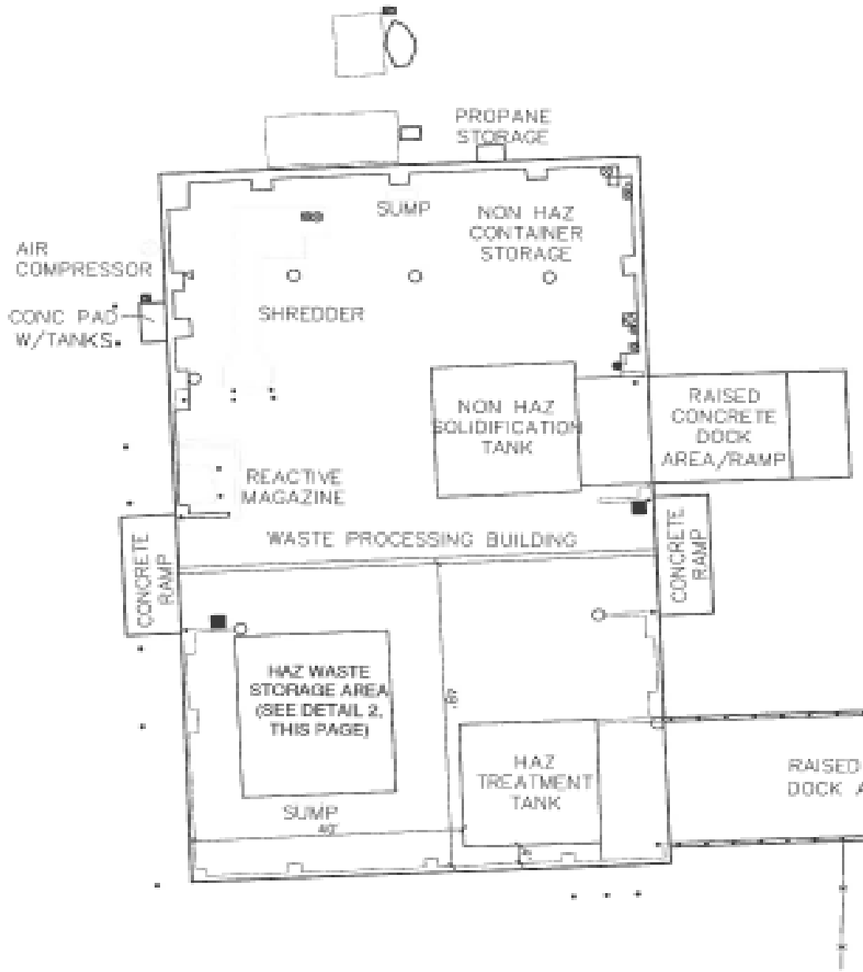

LEGEND
PRIMARY EVACUATION ROUTE - WEST PROCESSING BUILDING
PRIMARY EVACUATION ROUTE - EAST PROCESSING BUILDING
SECONDARY EVACUATION ROUTE
EAST 8TH AVENUE
SECONDARY MEETING AREA
PRIMARY MEETING AREA - WASTE PROCESSING BLDG
PRIMARY MEETING AREA - OFFICE BLDG
1 EMERGENCY PREPAREDNESS PLAN
NOVA
EQ FLORIDA, INC.
FIGURE 11 - EMERGENCY PREPAREDNESS PLAN
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
Emergency Preparedness Plan
11


FLOW SCHEMATIC DETAIL FOR CATCHMENT AREA
ON ORIENT ROAD PROPERTY (SEE FIGURE 14)
DRAINAGE & STORMWATER CONTROLS
LEGEND
EAST 8TH AVENUE
EQ FLORIDA, INC.
FIGURE 13 - DRAINAGE & STORMWATER CONTROLS
Drainage & Stormwater Controls
13

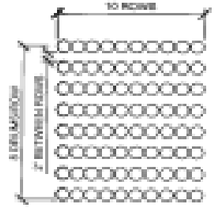

LEGEND
STAGING AREA
COVERED PROCESSING AREA
CONTAINER STORAGE BUILDING
WASTE STORAGE IS ORGANIZED BY HAZARD CLASS AND COMPATABILITY
CONC.
CONC.
STAGING AREA (ASPHALT)
RETAINING WALL LOCATION (APPROX)
SPEED BUMP
TRENCH DRAIN
SUBSURFACE PIPE
PAINT CAN CRUSHER
BAY 1A
BAY 1B
BAY 2
BAY 3A
BAY 3B
CLOSET
RENTION POND
SECONDARY CONTAINMENT AREA
TRENCH DRAIN
RAMP
CARBON AND SAND FILTER
DRUM CRUSHER/ RAG COMPACTOR
TRENCH DRAIN
SLIDING GATE
(REFER TO DETAIL 2 ON FIGURE 13)
1 CONTAINER STORAGE BUILDING & COVERED PROCESSING AREA LAYOUT
NOVA
DANIEL E. WOLF
LICENSE
STATE OF FLORIDA
PROFESSIONAL ENGINEER
EQ FLORIDA, INC
FIGURE 14 - CONTAINER STORAGE BUILDING & COVERED PROCESSING AREA LAYOUT
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
Container Storage & Covered Processing Area Layout
14

LEGEND:

- FIRST AID STATION
- EMERGENCY STOP FOR SHREDDER
- EYE WASH STATION
- FIRE ALARM
- SPILL KIT
- AIR HORN
- FIRE SUPRESSION FOR SHREDDER
- FIRE EXTINGUISHER
- CEILING MOUNTED SMOKE DETECTOR TIED IN WITH ADT/TYCO



1 WASTE PROCESSING BUILDING LAYOUT
SCALE: 1:10 at 24x36 (1:20 AT 11x17)



2 HAZ WASTE CONTAINER STORAGE DETAIL
SCALE: 1:10 at 24x36 (1:20 AT 11x17)

ASSUMED NORTH
GRAPHIC SCALE

NOVA
1226 Tech Blvd
Tampa, Fl 33619
office: 813.623.3100
fax: 813.623.3546
www.usanova.com

FIGURE 15 - WASTE PROCESSING BUILDING LAYOUT & ASSOCIATED STORAGE AREAS

EQ FLORIDA, INC.

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

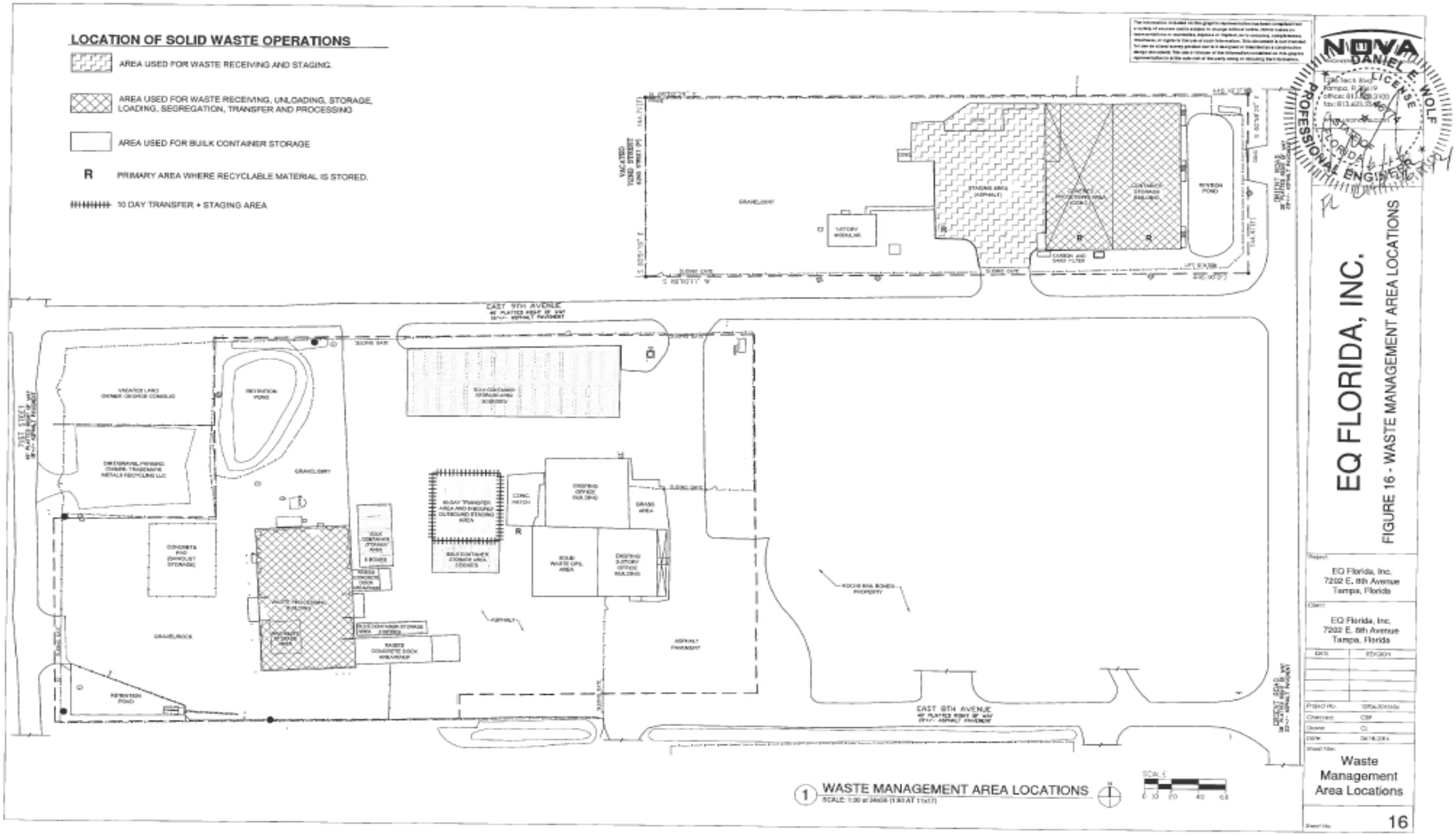
Client:
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida

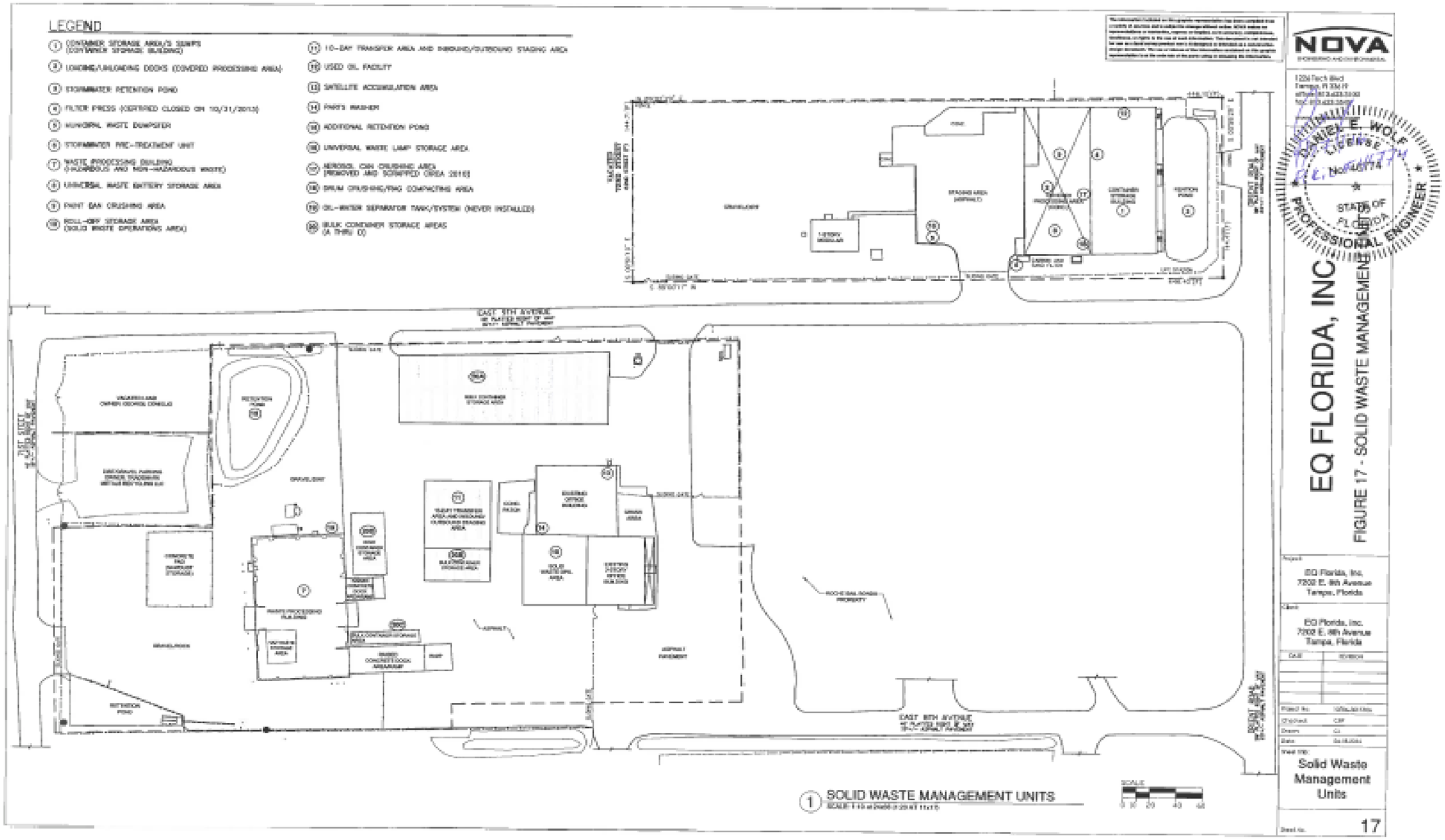
BAR	REVISION

Project No.	10704-301134
Checked:	CBP
Drawn:	CS
Date:	04-18-2016

Sheet Title:
Waste Processing Building Layout

Sheet No.
15


LOCATION OF SOLID WASTE OPERATIONS
AREA USED FOR WASTE RECEIVING AND STAGING.
AREA USED FOR WASTE RECEIVING, UNLOADING, STORAGE, LOADING, SEGREGATION, TRANSFER AND PROCESSING
AREA USED FOR BULK CONTAINER STORAGE
R
PRIMARY AREA WHERE RECYCLABLE MATERIAL IS STORED.
10 DAY TRANSFER + STAGING AREA
EAST 9TH AVENUE
EAST 8TH AVENUE
ROCHE RAIL BOXES PROPERTY
EQ FLORIDA, INC.
FIGURE 16 - WASTE MANAGEMENT AREA LOCATIONS
1 WASTE MANAGEMENT AREA LOCATIONS
SCALE: 1:30 at 24x36 (1:60 AT 11x17)
SCALE
Waste Management Area Locations
16


LEGEND
1 CONTAINER STORAGE AREA/3 SUMPS (CONTAINER STORAGE BUILDING)
2 LOADING/UNLOADING DOCKS (COVERED PROCESSING AREA)
3 STORMWATER RETENTION POND
4 FILTER PRESS (CERTIFIED CLOSED ON 10/31/2013)
5 MUNICIPAL WASTE DUMPSTER
6 STORMWATER PRE-TREATMENT UNIT
7 WASTE PROCESSING BUILDING (FLAMMABLES AND NON-HAZARDOUS WASTE)
8 UNIVERSAL WASTE BATTERY STORAGE AREA
9 PAINT GAN CRUSHING AREA
10 ROLL-OFF STORAGE AREA (SOLID WASTE OPERATIONS AREA)
11 10-DAY TRANSFER AREA AND INBOUND/OUTBOUND STAGING AREA
12 USED OIL FACILITY
13 SATELLITE ACCUMULATION AREA
14 PARTS WASHER
15 ADDITIONAL RETENTION POND
16 UNIVERSAL WASTE LAMP STORAGE AREA
17 AEROSOL CAN CRUSHING AREA (REMOVED AND SCRAPPED ORCA 2016)
18 DRUM CRUSHING/BALING COMPACTING AREA
19 OIL-WATER SEPARATOR TANK/SYSTEM (NEVER INSTALLED)
20 BULK CONTAINER STORAGE AREAS (A THRU D)
EAST 8TH AVENUE
ROCHE DALTONIA PROPERTY
1 SOLID WASTE MANAGEMENT UNITS
SCALE
NOVA
1324 Tech Blvd
Tampa, Fl 33619
EQ FLORIDA, INC.
FIGURE 17 - SOLID WASTE MANAGEMENT UNITS
DANIEL E. WOLF
LICENSE
STATE OF FLORIDA
PROFESSIONAL ENGINEER
EQ Florida, Inc.
7202 E. 8th Avenue
Tampa, Florida
Solid Waste Management Units
17

VOLUME 2 OF 3

Permit Modification Application

FOR

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

AT

7202 East 8th Avenue
Tampa, FL 33619

Permit No.: 34875-HO-011

EQ Florida, Inc.
7202 East 8th Avenue
Tampa, FL 33619

Revision: 02
July 29, 2016

CONTENTS – VOLUME 2 OF 3

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Appendix A	Articles of Incorporation • EQFL Articles of Incorporation • Property Warranty Deed
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 • SWMU Identification Summary • EPA RCRA RFA Letter, dated January 30, 1990 • FDEP RCRA RFA Addendum, dated May 13, 2011
Appendix H	EQFL Supplemental Emergency & Safety Equipment
Appendix I	Equipment Specifications • Drum Compactor • Paint Can Crusher • Fluorescent Lamp Disposer • Floor Coatings • Reactives Magazine • Hazardous Waste Treatment Unit
Appendix J	Waste Analysis Plan Documentation & EQFL SOPs • Waste Profile Form • LDR Notification Form • Chain of Custody Form • Waste Screening Flow Chart • Container Contents Form • Waste Receiving Report • EQFL Standard Operating Procedures
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

Process Code	Process Design Capacity and Units of Measure	Hazardous Waste Code(s)	Annual Quantity of Hazardous Waste (Gallons)[2]
S01	The permitted maximum capacity of 50,000 gallons is not exceeded at any time.	D001	1,174,068
S01		D002	986,625
S01		D003	90,720
S01		"D" Characteristic Wastes D004 - D043	917,655
S01		"F" Listed Wastes	564,699
S01		"P" Listed Wastes	24,667
S01		"K" Listed Wastes	11,000
S01		"U" Listed Wastes	74,269
		TOTAL =	3,843,703

T21[1]	"D" Characteristic Wastes to be treated will include only D002 and D004 through D011	935,731
T21[1]	K062	10,000 [3]
	TOTAL =	945,731

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

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

3/ Currently proposed K062 estimated volume.

Total Existing & Proposed Hazardous Waste Storage Capacities

Existing	
Container Storage Building (CSB) Bay 1	20,000 Gallons[4]
Container Storage Building (CSB) Bay 2	10,000 Gallons[4]
Container Storage Building (CSB) Bay 3	20,000 Gallons[4]
Improved Secondary Containment (ISC)	10,000 Gallons[4]
Inbound/Outbound Staging Area (I/O)	10,000 Gallons[4]
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

4/ 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

SWMU No.	SWMU Name / Description	Years of Operation	Waste Managed	Evidence of Release
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-Hazardpus 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 Wate 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 reactives 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

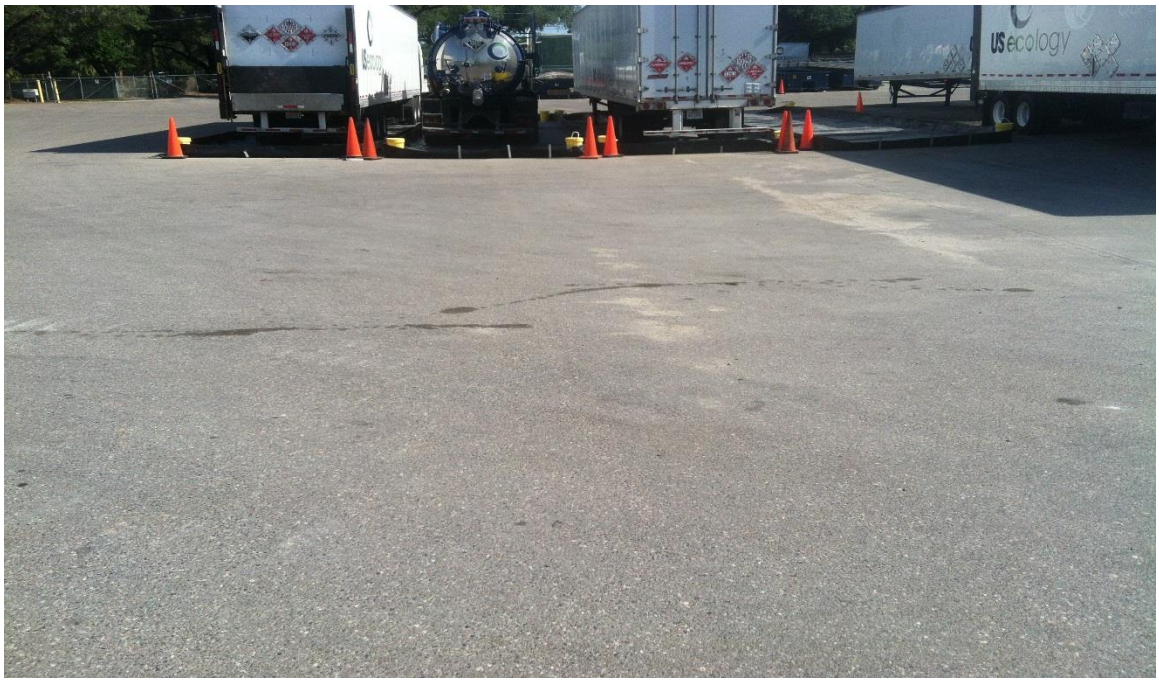
Photos of SWMU-19

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

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, 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^{0}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^{0}F ❑ 90-139^{0}F ❑ 140-199^{0}F ❑ >200^{0}F ❑ N/A

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

❑ **None**	❑ Free Liquids	❑ Metal Fines	❑ Water Reactive	❑ Biohazard
❑ Shock Sensitive	❑ Oily Residue	❑ Dioxins	❑ Furans	❑ Aluminum
❑ Asbestos – non-friable	❑ Asbestos – friable	❑ Other Radioactive	❑ Air Reactive	❑ Isocyanates
❑ Biodegradable Sorbents	❑ Pyrophoric	❑ Reactive Sulfide	❑ Reactive Cyanide	❑ Explosives
❑ Temperature Controlled Organic Peroxide		❑ NORM	❑ 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 ≥ 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) ≥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 statues, 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.

US ecology

Land Disposal Restriction & Certification Form

Generator Name: _____ U.S. EPA ID No.: _____

Uniform Manifest No.: _____ LDR Page ____ of _____

Manifest Page No. & Line Item	U.S. EPA Hazardous Waste Code(s)	NWW or WW	LDR Certification (One per Line)	Subcategory	F001-F005 Constitutents (If Applicable)	UHC: Underlying Hazardous Constituents (If Applicable)

I hereby certify that all information submitted on this and all associated documents, is complete and accurate to the best of my knowledge and information.

Generator Signature: _____ **Title:** _____

Printed Name: _____ **Date:** _____

CSV-FM-002-COR 10/10

US Ecology Tampa
CHAIN OF CUSTODY RECORD
Telephone: (813) 319-3400 Internet: www.usecology.com

To: _____ From: _____
Address: _____ Sampler: _____
_____ Contact: _____
Attention: _____ 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

LAB-FM-053-FLA

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

12/17/15

US ECOLOGY - TAMPA
7202 East 8th 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 ☐ No ☐ This is page _____ of _____.

WHITE - TSDF CANARY - CUSTOMER PINK - DRUM COPY

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.

Form: OPS-FM-008-FLA Effective Date: 12/30/15

EQ Florida, Inc.
Container Log - Process

Manifest/BOL: _____ Manifest Line ID: _____
Truck No.: _____
Transporter: _____
Generator: _____

_____ of _____
(# Container Logs per Truck)

Receipt ID: _____
Date: _____
Arrival Time: _____
Scheduled Time: _____
Non-Bulk Total Quantity: _____

Approval: DDVOC: 0 CCVOC: 0
Waste Common Name:
Treatment:
Manifest Comments:

Approval Comments:
Spec Hand Instruct:

Waste: Containers: Quantity:

T Secondary Waste Codes:

Cont #	Actual Container Received					Plant	Compatibility			Treatment Tank Disposal						
	Size	Type	Weight	Liquid	Solid	Sampler	Tank#	Date	Chemist	Tank#	Qty	Date	Time	Emp.	Comments	BarCode
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.

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 ¾ 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:

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.

MANAGEMENT PROCEDURE (FL)

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.

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.

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 Manger, 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:

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.

Standard Operating Procedure

Document Number:	OPS-OP-071-FLA	Issue Date:	11/14/14
Author:	Stuart Stapleton, Rich Ascough	Revision Date:	7/27/16
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.

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**

1.1.10. **K062 (Proposed)**

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-NuetralSP-Sub D

1.2.6. **1415** AMix-NuetralSP-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

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

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.

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 of 12 mph sustained or 25 mph gusts, where particulate matter is not feasible to control, processing should cease for 30 minute intervals.

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 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.).

5.7. Each roll-off box is moved from the Waste Processing Building and placed into storage within the10-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.

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.

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

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.

Work Instruction

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.

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:	07/27/16
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 and will be implemented upon issuance of modified permit.

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.

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.

3. Each crack/gap in need of repair will have asphalt patch/caulk applied in a sufficient amount to eliminate the crack/gap.

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.

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.

APPENDIX K

In-Bound Waste Shipment Records & Waste Characterization Reports

Inbound Containers Summary by Treatment, Size (CY 2015)

22- EQ Florida, Inc.

00-EQ Florida, Inc.

Treatment: 1006 AH Min-Neut/Stab-Sub D (D002, D004-D011)

Container Size	# Containers	Weight
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
Total # Containers for Treatment 1006 AH Min-Neut/Stab-Sub D:	**228**	**265,856.000**

Treatment: 1007 AH Min-Transhipp-TSD (D002, D004-D011)

Container Size	# Containers	Weight
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
Total # Containers for Treatment 1007 AH Min-Transhipp-TSD:	**68**	**106,210.000**

Treatment: 1010 AH Nitric-Transhipp-TSD (D002, D004-D011)

Container Size	# Containers	Weight
DM55 Containers	3	1,423.000
T275 Containers	1	2,486.000
Total # Containers for Treatment 1010 AH Nitric-Transhipp-TSD:	**4**	**3,909.000**

Treatment: 1012 AL Chrome-Neut/Stab-Sub D (D002, D004-D011)

Container Size	# Containers	Weight
DM30 Containers	1	191.000
Total # Containers for Treatment 1012 AL Chrome-Neut/Stab-Sub D:	**1**	**191.000**

Treatment: 1014 AL HF-Neut/Stab-Sub D (D002, D004-D011)

Container Size	# Containers	Weight
DM30 Containers	1	138.000
DM55 Containers	2	822.000
Total # Containers for Treatment 1014 AL HF-Neut/Stab-Sub D:	**3**	**960.000**

Treatment: 1015 AL HF-Transhipp-TSD (D002, D004-D011)

Container Size	# Containers	Weight
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
	Total # Containers for Treatment 1015 AL HF-Tranship-TSD:	**36**	**45,715.000**
Treatment:	**1016 AL Min-Neut/Stab-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	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
	Total # Containers for Treatment 1016 AL Min-Neut/Stab-Sub D:	**714**	**783,253.000**
Treatment:	**1017 AL Min-Tranship-TSD (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	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
	Total # Containers for Treatment 1017 AL Min-Tranship-TSD:	**241**	**55,977.670**
Treatment:	**1018 AL Nitric-Neut/Stab-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	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
	Total # Containers for Treatment 1018 AL Nitric-Neut/Stab-Sub D:	**70**	**63,241.000**
Treatment:	**1019 AL Nitric-Tranship-TSD (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	DM15 Containers	1	119.000
	DM55 Containers	10	4,098.000
	T275 Containers	1	2,585.000
	Total # Containers for Treatment 1019 AL Nitric-Tranship-TSD:	**12**	**6,802.000**
Treatment:	**1023 AOrg-Neut/Stab-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**

	DM55 Containers	9	5,306.000
	Total # Containers for Treatment 1023 AOrg-Neut/Stab-Sub D:	**9**	**5,306.000**

Treatment: 1034 BLiquid-Tranship-TSD (D002, D004-D011)

Container Size	# Containers	Weight
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
Total # Containers for Treatment 1034 BLiquid-Tranship-TSD:	**268**	**39,267.780**

Treatment: 1035 BLiquid-Neut/Stab-Sub D (D002, D004-D011)

Container Size	# Containers	Weight
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
Total # Containers for Treatment 1035 BLiquid-Neut/Stab-Sub D:	**286**	**342,475.000**

Treatment: 1052 CMet Liq-Stab-Sub D (D004-D011)

Container Size	# Containers	Weight
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
Total # Containers for Treatment 1052 CMet Liq-Stab-Sub D:	**553**	**342,833.000**

Treatment: 1053 CMet Liq-Tranship-TSD (D004-D011)

Container Size	# Containers	Weight
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
	Total # Containers for Treatment 1053 CMet Liq-Tranship-TSD:	**221**	**95,191.650**
Treatment:	**1056 CMet Sol-Consolidat-TSD (D004-D011)**		
	Container Size	**# Containers**	**Weight**
	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
	Total # Containers for Treatment 1056 CMet Sol-Consolidat-TSD:	**100**	**12,618.000**
Treatment:	**1057 CMet Sol-Stab-Sub D (D004-D011)**		
	Container Size	**# Containers**	**Weight**
	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
	Total # Containers for Treatment 1057 CMet Sol-Stab-Sub D:	**1706**	**807,053.250**
Treatment:	**1058 CMet Sol-Tranship-TSD (D004-D011)**		
	Container Size	**# Containers**	**Weight**
	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
	Total # Containers for Treatment 1058 CMet Sol-Tranship-TSD:	**524**	**32,297.770**
Treatment:	**1125 KAcid-Dpack-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	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
	Total # Containers for Treatment 1125 KAcid-Dpack-Sub D:	**281**	**39,541.000**
Treatment:	**1128 KAcid-Tranship-TSD (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**

	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
	Total # Containers for Treatment 1128 KAcid-Tranship-TSD:	**1404**	**76,619.500**

Treatment: 1129 KBase-Dpack-Sub D (D002, D004-D011)

Container Size	# Containers	Weight
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
Total # Containers for Treatment 1129 KBase-Dpack-Sub D:	**403**	**50,851.000**

Treatment: 1132 KBase-Tranship-TSD (D002, D004-D011)

Container Size	# Containers	Weight
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
Total # Containers for Treatment 1132 KBase-Tranship-TSD:	**1274**	**61,287.980**

Treatment: 1156 KToxic-Dpack-Sub D (D004-D011)

Container Size	# Containers	Weight
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
Total # Containers for Treatment 1156 KToxic-Dpack-Sub D:	**35**	**1,546.000**

Treatment: 1162 KToxic-Tranship-TSD (D004-D011)

Container Size	# Containers	Weight

	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
	Total # Containers for Treatment 1162 KToxic-Transhipp-TSD:	**194**	**8,121.000**
Treatment:	**1358 ASolid-NeutralSP-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	DM55 Containers	3	732.000
	LBS Containers	602	4,536.510
	Total # Containers for Treatment 1358 ASolid-NeutralSP-Sub D:	**605**	**5,268.510**
Treatment:	**1366 BSludge-Neut/Stab-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	DM55 Containers	1	638.000
	Total # Containers for Treatment 1366 BSludge-Neut/Stab-Sub D:	**1**	**638.000**
Treatment:	**1370 BAmmonia-Transhipp-TSD (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	DM55 Containers	7	3,200.000
	LBS Containers	45	4,444.400
	Total # Containers for Treatment 1370 BAmmonia-Transhipp-TSD:	**52**	**7,644.400**
Treatment:	**1415 AMixed-NeutralSP-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	LBS Containers	29	947.000
	Total # Containers for Treatment 1415 AMixed-NeutralSP-Sub D:	**29**	**947.000**
Treatment:	**1547 BAmmonia-Neut/Stab-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	DM55 Containers	3	1,057.000
	Total # Containers for Treatment 1547 BAmmonia-Neut/Stab-Sub D:	**3**	**1,057.000**
Treatment:	**1625 BSolid-NeutralSP-Sub D (D002, D004-D011)**		
	Container Size	**# Containers**	**Weight**
	DM05 Containers	6	28.000
	DM55 Containers	1	125.000
	LBS Containers	3	117.000
	Total # Containers for Treatment 1625 BSolid-NeutralSP-Sub D:	**10**	**270.000**

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 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

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, 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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 ≥ 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) ≥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 attorneysÆ 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 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 # 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, 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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, magnesioum, 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? (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), 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 ≥ 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) ≥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 attorneysÆ 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 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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.

Chromic 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 ≥ 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) ≥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

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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 _____

Company _____ Title _____ Date _____

STANDARD TERMS AND CONDITIONS

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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.

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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.

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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 attorneysÆ 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 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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? ○ 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 ≥ 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) ≥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 attorneysÆ 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 # 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 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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? (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:

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 ≥ 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) ≥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 attorneysÆ 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 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

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: 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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 ≥ 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) ≥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.

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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.

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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.

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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.

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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 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 # 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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 ≥ 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) ≥ 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 attorneysÆ 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 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

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: 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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? (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, 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 ≥ 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) ≥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

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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.

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"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 attorneysÆ 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 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 # 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, 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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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? (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 ≥ 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) ≥ 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.

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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 attorneysÆ 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 # 174101

WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at 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: ORGANIC ACID SOLUTIONS

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:
UN3265, Waste, Corrosive liquid, acidic, organic, n.o.s., 8, PGII, ERG #153

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)**

☐ **None**	☑ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos -non- friable	☐ Asbestos - friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ 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 ≥ 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) ≥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 attorneysÆ 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, 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^{0}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^{0}F ❑ 90-139^{0}F ❑ 140-199^{0}F ❑ >200^{0}F ☒ N/A

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

❑ **None**	☒ Free Liquids	❑ Metal Fines	❑ Water Reactive	❑ Biohazard
❑ Shock Sensitive	❑ Oily Residue	❑ Dioxins	❑ Furans	❑ Aluminum
❑ Asbestos – non-friable	❑ Asbestos – friable	❑ Other Radioactive	❑ Air Reactive	❑ Isocyanates
❑ Biodegradable Sorbents	❑ Pyrophoric	❑ Reactive Sulfide	❑ Reactive Cyanide	❑ Explosives
❑ Temperature Controlled Organic Peroxide		❑ NORM	❑ 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? (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 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 ≥ 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) ≥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 statues, 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