RECEIVED ENVIRONMENTAL PROTECTION

AUG 3 0 2016

PERMITTING & COMPLIANCE ASSISTANCE PROGRAM

August 26, 2016

Mr. Merlin Russell Jr.
Professional Geologist II
Hazardous Waste Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd., M.S. #4560
Tallahassee, FL 32399-2400

RE: Safety-Kleen Systems, Inc. Tampa; FLD 980 847 271, DEP Application No. 34744-HO-007, Hillsborough County-Hazardous Waste First Request for Additional Information (RAI)

Fed Ex: 8075 1627 7267

Dear Mr. Russell:

Safety-Kleen (SK) has prepared this letter in response to the above referenced letter from the Department dated July, 20 2016. We have identified each of the Departments comments in bold, followed by our response. Revised pages of the application are enclosed with this submittal.

General Comments #1: Any revisions to the Part B in one location must be done throughout the document. Although this RAI tries to point out multiple locations throughout the Part B where identical changes are required or suggested, it is the responsibility of Safety-Kleen to ensure changes are made throughout the Part B.

SK Response: Any revisions to the Part B will be completed throughout the application.

Specific Comments #2 a. Part I: Page 4 Injection and Withdrawal Wells... This section appears to need an update because there is a withdrawal well on site. Section 3.1.4 of Safety-Kleen's August 2012 Site Assessment Report States:

"An onsite water well is located at the northeast corner of the S-K property within a pump house, as shown in Figure 2.3. The 2011 ROPRA (in the Contingency Plan, on p. 28) indicates that a fire suppression system is available at the facility, and that the system is supplied water from the onsite water well. The 2011 ROPRA (Part I.B.4, Table 2.2-2) also indicates that this "Public Supply" well is 5-inches in diameter, with a cased depth of 81 ft., and a total depth of 121 ft. (Appendix 3A herein). As such, this well is completed within the Upper Floridan aquifer."

The same information needs to be added to page Part II.A, page 2. Also, there are three wells within ¼ mile of the facility according to other parts of the application (e.g., Part I, Table 2.2-1).

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SK Response: Part I, and Part II have been updated to indicate there is a withdrawal well onsite, and two other withdrawal wells within ¼ mile of the facility. The Safety-Kleen Tampa facility was connected to the City of Tampa Sewer/Water system in 2014. The withdrawal well onsite is now only connected to the facility irrigation system.

Specific Comments #2 b. Part I: Page 5: Under the Description of Facility Operation, a brief description of waste oil is omitted and should be included in length and scope similar to the other waste streams.

SK Response: A description of waste used oil has been added to the Description of Facility Operation in Part I.

Specific Comments #2 c. Part I: Page 7: Antifreeze is not included on the list of numbered wastes.

SK Response: Antifreeze has been included on page 7 #2.

Specific Comments #2 d. Part I: Page 8, paragraph 2: This paragraph should note that there is no bulk storage of antifreeze at the branch. As is noted in Part II.P, the tanker the held used antifreeze was removed from the facility in 2009 (See discussions on SWMU-13).

SK Response: A note, now on page 10, has been added to state there is no bulk storage vessel at the facility specifically for the storage of used antifreeze at this time.

Specific Comments #2 e. Part I: Page 9: At least one figure must identify the battery storage area.

SK Response: The battery storage area has been identified on Figure 8.1-1.

Specific Comments #2 f. Part I: Page 9: The Continued Use Program (CUP) was approved prior to the Department's adoption of the new legitimacy criteria for recycling of hazardous secondary materials in 40 CFR 260.43. Safety-Kleen's discussion of the Continued Use Program does not include a reference to the Department's CUP approval in a letter dated October 25, 1999. Safety-Kleen's permit subsequent permit modification dated October 4, 2000 included a number of operating conditions intended to ensure that this was a legitimate recycling process. In view of the new conditions imposed under 40 CFR 260.43, please provide documentation that the Continued Use Program satisfies the legitimacy criteria under 40 CFR 260.43.

SK Response: A reference to the Department's CUP approval letter, dated October 25, 1999, has been added to the discussion of the Continued Use Program. This discussion is now found on page 11 of Part I. Safety-Kleen does not believe the CUP material being received from customers at the Tampa branch meets the definition of a hazardous secondary material in 40 CFR 260.10, as it is not a spent material,

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by-product, or sludge. The Continued Use Program was authorized per 40 CFR 261.2(e)(1)(ii), materials that are not solid waste when recycled by being used or reused as an effective substitute for a commercial product.

Specific Comments #2 g. Part I: Page 10, Part I.D.3 Process Codes and Design Capacities:

- i. The discussion on the parts washer solvents managed does not distinguish between the spent premium solvent used in conventional parts washers vs. the solvent still bottoms recovered from Safety-Kleen's distilling parts washers (System One type units). Please address how these still bottom wastes will be characterized and managed by the company. Does the management method differ if the customer is identified as a small or large quantity generator, as opposed to a conditionally exempt small quantity generator?
- ii. The "Process Design Capacity" for the Branch-Generated Liquids and Tank Bottoms should both be 12,749 (not 12.749).
- iii. Antifreeze is missing from the Table.
- iv. "Retain Samples from Used Oil Operations" and "Spent Aerosol Cans" are missing from the table (Table 5.1-1 in the Contingency Plan includes both of these).
- v. D002 should be included as a transfer waste.

SK Response:

- i. The used oil and distillation sludge from the System One type parts washing units will be managed according to the generators waste determination. If the generator is a CESQG, and they are a generator of used oil, SK recommends that the customer add this to their used oil container/tank. If the generator is a SQG/LQG, and they have determined the material is a hazardous waste, it will be managed through Safety-Kleen's containerized waste program (CWS) as a transfer waste. If a SQG/LQG determines the material is not a hazardous waste, they may manage the material with their used oil, or have it managed as a non-hazardous containerized waste through Safety-Kleen's CWS.
- ii. The Process Design Capacity for Branch-Generated Liquids and Tank Bottoms has been revised to indicate 12,749.
- iii. Used Antifreeze collected in containers/drums would be included with Fluid Recovery Service (FRS).
- iv. These waste streams have been added to the Process Codes and Design Capacities Table.
- v. D002 wastes are included as Fluid Recovery Service (FRS) wastes, and are managed as 10-day transfer hazardous wastes.

Specific Comments #2 h. Part I: Figure 2.1-1 *Facility Layout...* Here or elsewhere the location of the onsite Floridan well should be shown.

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SK Response: The location of the Floridan well has been added to Figure 2.1-1.

Specific Comments #2 i. Part I: Table 2.2-1 Well Search Report does not identify well locations on a figure. Well locations should be identified on a map.

SK Response: A map has been compiled identifying well locations and is included with this submittal.

Specific Comments #3: Certification pages. — We do not believe that Mark Hansen is authorized to sign for Safety-Kleen. Only an officer or a non-officer with written signatory authorization can sign for a Corporation. In Safety-Kleen's most recent filing on Sunbiz, Mr. Hansen is not listed as an officer. Mr. Hansen would need to provide a certification of authority from an officer of Safety-Kleen in order to sign documents on Safety-Kleen's behalf. In the absence of a signed certification of authority for Mr. Hansen, the certification pages will need to be signed by an officer of Safety-Kleen Systems, Inc.

SK Response: The original submission may not have included the Safety-Kleen Systems, Inc. Consent Resolution of the Directors, dated June 18, 2014. Under this resolution the Safety-Kleen Systems, Inc. Directors authorize individuals with the title of Director to sign, certify, and deliver on behalf of the Company or any subsidiary, any permit applications. I have included this document for the Department's review.

Specific Comments #4: Part II.A - General, pg. 1: The word "Topography" is misspelled.

SK Response: The word "Topography" has been corrected.

Specific Comments #5 a.: Contingency Plan – Page 4, General Description of Activities should include a brief discussion of the used oil.

SK Response: A brief discussion of the used oil has been added to page 6 of the contingency plan.

Specific Comments #5 b.: Contingency Plan – Page 6: Safety-Kleen indicates that the area storing universal waste lamps will be marked in accordance with paragraph 62-737.400(5)(b), FAC. The boxes or the lamps must be labeled, not the area in which they are stored. Safety-Kleen should be using the marking requirements required by 40 CFR 273.14(e).

SK Response: Revisions have been made, now on page 7, to indicate the boxes are labeled in accordance with Chapter 62-737.400(5)(b).

Specific Comments #5 c.: Contingency Plan – Page 12: To assist (if needed) in notifying neighboring establishments, we recommend that contacts be included in the CP.

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SK Response: Safety-Kleen will attempt to obtain contact information from neighboring establishments. However, this information will not be part of the formal contingency plan as we cannot control changes to this information.

Specific Comments #5 d.: Contingency Plan - Page 17:

- i. The CP should include discussions on the above-ground piping because the supports have failed in the past. Also, include a figure that shows the locations of the above-ground piping.
- ii. Under *Spill Control Procedures,* item 1 should probably be "Stop the discharge." transferring liquids to a good container may be one way to stop a discharge. Another method would be to close the valve (for tanks).

SK Response:

- i. Page 9, under daily inspections of above-ground tanks, has been revised to include daily inspections will check for piping/piping supports from the return/fill to the tank farm.
 Figures 9.1-1, and 11.1-1 show the location of the above-ground piping from the return/fill area to the tank farm.
- ii. Page 17, #1, has been revised to include closing the valves (for tanks) as a way to stop the discharge.

Specific Comments #5 e.: Contingency Plan – Page 17: Although Safety-Kleen stores primarily liquid wastes, some non-liquid wastes are stored (e.g., Branch-generated Solids (Debris)). The CP must be revised to address response to solid (physical state) waste.

SK Response: Solid (physical state) waste response has been added to page 18 of the CP.

Specific Comments #5 f.: Contingency Plan – Page 20: The first sentence is repeated (See last sentence on page 19).

SK Response: The first sentence, "Containers are stored on pallets whenever possible", has been deleted from page 20.

Specific Comments #5 g.: Contingency Plan – Page 22: Under **Tank Area**, Figure 5.6-5 should be revised to show the location of the shallow drainage trench, and sump in the southwestern corner of the secondary containment.

SK Response: The above revision to Figure 5.6-5 has been made and is enclosed.

Specific Comments #5 h.: Contingency Plan – Presumably the text is intended to address Employee Strikes, and not lightning strikes. The text should be clarified.

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SK Response: Employee has been added to the text for clarification.

Specific Comments #5 i.: Contingency Plan – Page 28, *Hurricane Watch:* We'd recommend that the list of employees and phone numbers be developed *prior* to the onset of a hurricane, and updated whenever there are changes in personnel or contact information.

SK Response: As part of Safety-Kleen's internal Branch Operating Guidelines, in this case "Preparation and Response to Natural Disasters and Pandemics" (BOG O430-001), a current list of employees and their phone numbers is kept on hand at the facility.

Specific Comments #5 j.: Contingency Plan – Page 29, **Evacuation Plan**: There should be a reference to Figure 5.6-6 that illustrates the evacuation route and gathering point.

SK Response: A reference to Figure 5.6-6 has been added to page 29.

Specific Comments #5 k.: Contingency Plan – Figure 5.2-1: Remove Chris Abel's name and title from the checklist.

SK Response: Chris Abel's name and title have been removed from Figure 5.2-1.

Specific Comments #5 I.: Contingency Plan – In comparing Figures 5.6-1 and 5.6-3, it appears that the "Flammable/Nonflammable Waste Staging Areas (on Figure 5.6-3) is within the "Non-Flammable Area 2" (on Figure 5.6-1).

SK Response: Figures 5.6-1 and 5.6-3 have been revised to show the Flammable Waste Staging Area within the Flammable Storage Area, and the Non-Flammable Waste Staging Area within the Non-Flammable Storage Area.

Specific Comments #5 m.: Contingency Plan — Figure 5.6-6, Evacuation Routes: The figure is too busy. It should be simplified and internal evacuation routes should be added.

SK Response: Figure 5.6-6 has been revised, and simplified, to add internal evacuation routes.

Specific Comments #5 n.: Contingency Plan - Table 5.2-1

- i. Does not include the weekly check of communication devices discussed at the top of page 8.
- ii. Does not include checking to ensure that inbound and outbound containers have not exceeded the 72-hour period for unloading or shipping.

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SK Response:

- i. Weekly check of communication devices has been added to Table 5.2-1
- ii. Inbound/outbound shipment check has been added to Table 5.2-1

Specific Comments #5 o.: Contingency Plan – Table 5.2-1: Include above-ground piping.

SK Response: Above-ground piping has been added to Table 5.2-1.

Specific Comments #5 p.: Contingency Plan – Table 5.6-1, Emergency Response Equipment. There are inconsistencies in locations of the telephones when compared to Figure 5.6-1:

- i. The figure shows no telephones in either office (there is an office north of the North Building and an office in the northeast corner of the South Building).
- ii. The figure shows no telephone in the South Building.

SK Response: Inconsistencies between Table 5.6-1 and Figure 5.6-1 have been revised to reflect telephones in both the office north of the North Building (Front Office) and the office in the northeast corner of the South Building (South Building Office).

Specific Comments #6: Training – Page 32, the **Outline of Training Topics** (Table 6.1-1) does not appear to contain a number of topics such as:

- a. Hazardous waste permit conditions and compliance.
- b. Hazardous waste storage tank and container regulations.
- c. Used Oil training.
- d. Universal Waste Training.
- e. Manifests.
- f. Recordkeeping.
- g. Review of hazardous waste determinations, especially with sales and customer service representatives (Parts 261 and 268 compliance).
- h. Recognition of the different waste streams (e.g., used oil, combustibles, ignitables, etc.) for drivers who consolidate drums. Drivers must be able to screen oil to ensure they are not accepting used oil mixed with flammables or combustible.

SK Response: Table 6.1-1 is an outline of initial training that all new employees receive prior to working at the facility. This training is completed at an off-site company training facility. After an employee successfully completes this initial training, they report back to their respective facility and receive initial RCRA training that includes the above topics. Page 32 has been revised for clarification. The above topics are covered with branch employees during RCRA training. Table 6.1-15 has been revised to include these topics under the initial and annual RCRA training.

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Specific Comments #7 a.: Waste Analysis Plan (WAP) - The WAP does not contain procedures for wastes that are not part of the AR such as:

- i. Branch-generated liquids and solids.
- ii. Naptha-based drycleaning wastes.
- iii. Antifreeze.
- iv. Retain samples for used oil. Include procedures you sent to Roger Evans in your November 18, 2015 e-mail.
- v. The AR does not distinguish between automotive parts washers and aerospace/industry parts washers. The AR is not representative of all waste streams generated by the industrial sectors. DEP has found consistent failures for metals in from parts washers from the aerospace/industry.
- vi. The table of wastes does not distinguish between spent parts washer solvent vs. still bottoms or other wastes generated from System One distilling parts washers. Does Safety-Kleen have data characterizing the still bottom material? Is this sampled as part of the Annual Re-characterization program?

SK Response:

- i. Branch-generated liquids and solids (Debris) is not sampled and analyzed as part of the AR program. A "worst case scenario" approach is used for this waste stream.
- ii. Naptha-based dry cleaning wastes are part of the AR, but were mistakenly omitted. The WAP, and all associated waste tables have been revised to include this waste stream.
- iii. Used antifreeze collected by the Safety-Kleen Tampa facility is sent for recycling in accordance with the Department's "Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities, date May 22, 2012".
- iv. Procedures regarding appearance of used oil retain samples taken at customer locations sent to Roger Evans via e-mail on November 18, 2015 have been added to page 5, paragraph 2 of the WAP.
- v. The AR program involves random sampling of SK spent parts washer solvent (mineral spirits), as well as other waste streams, from customer containers. The waste analysis information compiled as a result of this program is communicated to customers using SK parts washer solvent regardless of the whether they are in the automotive sector, or aerospace/industrial sector. This is done to assist them in making a waste determination while they also consider their specific parts cleaning process. If a customer/generator determines specific waste codes apply to their spent parts washer solvent these codes will be used when the parts washer is serviced. Safety-Kleen realizes the parts washing process at an automotive business will differ from an aerospace/industrial business. This information is covered with SK sales/service personnel during training so they are aware, and can assist customers where needed.
- vi. System One distillation oil/sludge is not sampled as part of the AR program. If a

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customer characterized the System One distillation oil/sludge as a hazardous waste it would be managed as a 10-day transfer waste by the Safety-Kleen Tampa facility. SK recommends that CESQG customers who have characterized this material as a hazardous waste comingle it with their used oil, if they are a generator of used oil.

Specific Comments #7 b.: WAP – The WAP does not contain procedures for compliance with Part 279.43(b) regarding classification of mixtures of materials with different USDOT hazard classes.

SK Response: Safety-Kleen is aware of the requirements for compliance with Part 279.43(b) regarding classification of mixtures of materials with different USDOT hazard classes. We have procedures in place, such as pre-qualification sampling/analysis of non-automotive used oil, and the procedures outlined in the e-mail to Roger Evans on November 18, 2015 (checking the appearance/unusual odor/viscosity of retain samples). However, we do not believe that compliance with Part 279.43(b) is a requirement for a Waste Analysis Plan per 40 CFR Parts 264.13 and 270.14(b).

Specific Comments #7 c.: WAP – Page 1: The table identifying the "Permitted/Site Generated Wastestreams" is different than Table 5.1-1 "Permitted/Transfer/Site Generated Waste" located in the Contingency Plan, and both of these tables are inconsistent with Part I.D.3 "Process-Codes and Design Capabilities." These tables must be consistent throughout the application. Specifically for the WAP, the non-perchloroethylene (naptha) waste stream is missing from this table.

SK Response: All tables have been revised to be consistent with one another.

Specific Comments #7 d.: WAP – Pages 3 and 4 do not include discussions on "Dry-cleaning waste (non-perchloroethylene)" that are identified as a waste stream on Table 5.1-1 "Permitted/Transfer/Site Generated Waste". Non-perchloroethylene dry-cleaning waste is not part of the AR.

SK Response: Page 3 has been revised to include non-perchloroethylene (naptha-based) dry-cleaning waste. This waste stream is part of the AR, and the analytical report pages have been included with this response.

Specific Comments #7 e.: WAP – Page 4, Wastes Resulting from Paint and Thinner Service: The first sentence should probably read "Paint wastes consist of Safety-Kleen...resulting for from cleaning..."

SK Response: The above revision has been completed on page 4, of the WAP.

Specific Comments #7 f.: WAP – Page 5: Discuss the procedure used to characterize the Used Oil/Oily Water Retain samples that are disposed of as hazardous waste. Include how and where samples are taken, the sampling device(s), EPA SW-846 analytical methods, recordkeeping and how this information is used for shipping the waste off as a hazardous waste.

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SK Response: The used oil/oily water retain samples are managed as a hazardous waste because they are not being sent for recycling. The waste codes selected are a conservative characterization based on contaminants that could be present.

Specific Comments #7 g.: WAP – Page 5: It would be appropriate to note that the SAA noted in the *Site Generated Spent Aerosol Cans* is SWMU-19.

SK Response: This has been noted on page 5.

Specific Comments #7 h.: WAP – Page 5: It would be appropriate to include discussions on other types of waste that Safety-Kleen manages such as batteries, mercury-containing lamps/devices and used antifreeze.

SK Response: Discussions regarding batteries, mercury-containing lamps/devices, and used antifreeze have been added to pages 5 and 6.

Specific Comments #7 i.: WAP - Page 6, Prescreening of Customers

- i. The information provided to generators from Safety-Kleen should be included as an attachment in the WAP.
- ii. Prescreening of pesticides, herbicides or pharmaceuticals from the aerospace/industrial customers must be included.

SK Response:

- i. As stated in the WAP, the customer's business is reviewed by a SK representative. Information including: types of parts to be cleaned, cleaning process and how that may affect characterization of the spent material, frequency of use (service term), and pricing are discussed with the customer. In addition, a Safety Data Sheet for the cleaning solution is provided, and correct operation of the unit is discussed and reviewed with the customer. An operator's booklet is provided to the customer that includes specific instructions: to use only the cleaning fluid provided by SK, not to spray aerosols into or around the equipment, and not to add any other cleaning fluids or chemicals into the unit. I have included operator's booklets for the immersion cleaner, and model 16 & 30 parts washers with this submission.
- ii. As stated in the WAP, the customer's business is reviewed. Whether leasing a SK parts cleaning machine, or placing a customer owned machine service at an automotive, aerospace, industrial, pharmaceutical, or agricultural business, the customer is instructed to avoid introduction of pesticides, herbicides or pharmaceuticals into the machine.

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Specific Comments #7 j.: WAP – Page 6, Qualitative/Visual Analysis: It would be appropriate to note that every waste pickup goes through the Qualitative/Visual Analysis as is noted at the bottom of page 10.

SK Response: This has been noted on page 7, under Qualitative/Visual Analysis.

Specific Comments #7 k.: WAP – Page 7, last sentence in number 3. How does Safety-Kleen determine that there is a high density solvent in the bottom of a container using only a visual inspection (especially if the color is normally brown or black appearance)?

SK Response: Safety-Kleen concurs with the Department that a determination of a high density solvent in the bottom of a container using only a visual inspection would not be possible. The visual inspection procedures for immersion cleaner have been revised in the WAP.

Specific Comments #7 I.: WAP – Page 8, first paragraph, suggest: "...on all inbound bulk <u>waste</u> solvent deliveries."

SK Response: The above revision has been completed.

Specific Comments #7 m.: WAP – Page 11 Additional Requirements for Wastes Generated Off-Site: Describe management processes if additional waste codes are identified by the generator.

SK Response: Additional Requirements for Wastes Generated Off-Site, now on page 12, has been revised to include the above.

Specific Comments #7 n.: WAP - Page 12 Spent Solvent and Dioxin-Containing Waste

- i. There is no "268.2(f)(1)". Remove and insert another reference if another was intended.
- ii. The perchloroethylene treatment standard for *wastewaters* is 0.056 mg/l. Also, Safety-Kleen does manage some solids, e.g., debris.
- iii. The treatment standard for perchloroethylene non-wastewaters is 6.0 mg/kg.

SK Response: The treatment standard for perchloroethylene non-wastewaters has been revised to indicate it is 6.0 mg/kg.

Specific Comments #7 o.: WAP – Page 12, *Listed Waste*, last sentence. It appears that verbiage is missing from the sentence after "LDR". Perhaps the insertion of "paperwork" or something similar was intended?

SK Response: "Paperwork" has been inserted after "LDR" to this section.

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Specific Comments #7 p.: WAP – Page 13, *Characteristic Wastes.* The treatment standards for D006 (cadmium) and D007 (chromium) are 0.69 mg/l and 2.77 mg/l for wastewaters.

SK Response: Characteristic wastes, now on page 14, has been revised with the correct treatment standards.

Specific Comments #7 q.: WAP – Page 14. The second section states "None of Safety-Kleen Tampa's permitted wastes are shipped to a Subtitle C facility." Your application repeatedly states that wastes are transported to a permitted Safety-Kleen or Clean Harbors TSDF.

SK Response: This section has been revised to "All of Safety-Kleen Tampa's permitted wastes are shipped to a RCRA Subtitle C permitted facility".

Specific Comments #7 r.: WAP – Page 14, last sentence: References to Part 265 requirements should be eliminated.

SK Response: The reference to Part 265 requirements has been eliminated.

Specific Comments #7 s.: WAP – Exhibit C-2 AR Sampling Location Map. Three Florida facilities are identified on the map but not in the legend. It appears that the Boynton Beach facility should be added to the legend (or deleted from the map).

SK Response: The triangle indicator on the map is incorrect with respect to the number of Florida facilities participating in the AR program. The SK Tallahassee and Tampa facilities, indicated in the legend, are participants in the SK AR program. The triangle indicator in South Florida has been deleted from the map.

Specific Comments #7 t.: WAP – Exhibit C-4 Sample Testing Protocol.

- i. "Aqueous Brake Cleaner" is not a waste included in Table 5.1-1
 Permitted/Transfer/Site Generated Waste.
- ii. There are many updates to EPA Methods. Include the most recent updates: EPA SW-846 Methods 1010A, 9045D, 6010D, 7470A, 7471B, 8260B and 8270D.

SK Response:

- i. Aqueous Brake Cleaner has been added to Table 5.1-1.
- ii. Updates have been made to EPA Methods.

Specific Comments #8 a. Part II.B Containers: Page 2: A figure illustrating the piping, fire water tank and pump house for the fire suppression containment system should be included in this section.

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SK Response: Figure 8.1-4 has been created for the fire suppression system.

Specific Comments #8 b. Part II.B Containers: Page 4, last paragraph: Explain in more detail, under what isolated instances are special waste segregation needed? Explain how and where these "special" wastes managed.

SK Response: Any special waste segregation would most likely involve a 10-day transfer waste moving through the facility, as Safety-Kleen's core waste streams are known. All potential 10-day wastes are first reviewed by the Central Profile Group (CPG). If a waste container requiring segregation is picked up and transported to the branch (i.e., oxidizer); branch personnel would clear an area in the transfer area and secure with tape to ensure no other incompatible material(s) (flammables/combustibles, organic chemicals, reducing agents) can be stored near the container, or come into contact with the material.

This would not be a typical occurrence, and Safety-Kleen is aware that certain waste materials require segregation from others. Where these wastes would be managed depends on specific waste stream, but would take place within the 10-day transfer area(s) in the container storage area.

Specific Comments #8 c. Part II.B Containers: Figure 8.1-1 should label the North Building and South Building.

SK Response: Figure 8.1-1 has been revised with the North and South Building labeled.

Specific Comments #8 d. Part II.B Containers: Figure 8.1-3 must include a north arrow and scale.

SK Response: Figure 8.1-3 has been revised to include a north arrow and scale.

Specific Comments #9 Part II.C Tank System: Page 3 and Figure 9.1-1: The tank system drawings in this section and in the contingency plan should include diagrams of all above ground piping. In addition, this section should more clearly show which joints are threaded vs. welded, and show any piping joint outside of secondary containment is welded as stated in the second paragraph of page 3. The secondary containment system design for the ancillary equipment connected by threaded joints is not included in this section. Above ground piping with welded joints that is inspected daily is exempt from the secondary containment requirements per 40 CFR 264.193(f)(2). Please compare the diagram in this section to Figure 11.1-1, showing a threaded elbow at (1). Is this elbow located within secondary containment? If not, does this piping comply with 40 CFR 264.193(f)(4)?

SK Response: Figure 9.1-1 has been revised to show a clear boundary of piping exiting the return/fill station, and entering the tank farm. Both of these areas have secondary containment. With regards to the threaded elbow at (1), this elbow is well within secondary containment of the return/fill station.

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Specific Comments #10 a. Closure Plan: Page 2: Please check the dimensions of the North Building. This section states that it is a 40' x 30' area but if you use the scale in Figure 8.1-2 and/or Figure 8.1-1, the dimensions are approximately 68' x 55'.

SK Response: The North Building Storage Area is 27' 4" x 28' 4". I only measured the area noted for waste container storage, not the entire building itself. I have revised page 2 to indicate the above measurements for the area.

Specific Comments #10 b. Closure Plan: Also, please check the dimensions for the south building storage areas (compare with Figure 8.1-1).

SK Response: The dimensions for the South Building Non-Flammable Storage Area are 57' 8" x 45' 2", and the Flammable Storage Area is 39' 8" x 42' 3". These dimensions have been revised on page 2 of the closure plan.

Specific Comments #10 c. Closure Plan: Under 2. Maximum Inventory of Wastes, the Containerized Waste listed in this section appears to include only the non-flammable product and/or waste within the north and south building storage areas. The total capacity of the flammable storage area of 12,749 gallons was not included. Please explain or revise.

SK Response: The 12,749 gallon capacity of the flammable storage area has been added for a total of 59,169 gallons of containerized waste.

Specific Comments #11 a. Part II.S: Part II.S. Air Emission Standards, pages 6 and 8: 40 CFR Part 265 is occasionally referenced. This should be changed to Part 264 as noted elsewhere in this section.

SK Response: The Part 265 references have been revised to Part 264.

Specific Comments #11 b. Part II.S: Part II.S. Air Emission Standards, page 8: This section reads, "The most recent tank assessment was completed in May/June 2011." Is this the last time the fixed roof and closure devices of the tank were inspected? Tank integrity inspections may occur every ten years based upon what a qualified Professional Engineer believes is adequate for the tank. However, air emission inspections must be completed more frequently. Per 40 CFR 264.1084(c)(4)ii, the fixed roof and closure devices of tanks should be inspected every year. Table II.2-1 of your renewal application indicates that the tank should comply with Tank Level I requirements and be inspected at least once a year. The information contained in Appendix D of the renewal application also indicates that the tank is inspected yearly as part of the Subpart CC requirements. Please clarify or revise this section.

SK Response: The fixed roof and closure devices of the tank are inspected annually. Part II.S, page 8, has been revised to indicate this annual inspection.

Mr. Merlin D. Russell Jr. August 26, 2016 Page **15** of **15**

Specific Comments #12 Appendix A: Include a photograph of the piping from the wet dumpsters to the bridges.

SK Response: Photos of the piping from the return/fill to the tank farm have been included.

Specific Comments #13 Appendix C, Containment Calculations: Tank Containment, page 3 of 4. The units for the volume of the largest tank should be in ft³, not in gallons. This comment was previously made in 2011 with a revised calculation page submitted in August of 2011. The revised calculation page was not submitted with the latest renewal application.

SK Response: The revised calculation page is included with this response.

Thank you for the Departments time in this matter. If you have any question or require additional information, please do not hesitate to contact me.

Best regards,

Jeff Curtis

EHS Manager

Safety-Kleen Systems, Inc.

Enclosure(s): Permit application revisions

cc: Beth Knauss, FDEP Southwest District

Part I

- B. Site Information
- 3. FACILITY LAYOUT AND TRAFFIC PATTERNS

The facility layout is shown in Figure 2.1-1. Site traffic patterns are illustrated in Figure 2.1-2. Site photographs are provided in Appendix A. Approximately 14 trucks will leave and return to the site daily. One semi-tractor truck transports waste to a permitted Safety-Kleen/Clean Harbors TSDF weekly. The vehicles enter and exit through the mechanically operated gate at the Northeast corner of the facility, which opens onto 24th Avenue. Two additional manually operated gates are located at the center of the north fence line and the Southeast corner, providing access to 24th Avenue and 54th Street, respectively.

Fresh parts washer solvent is delivered to the Branch in tanker trucks. Fresh parts washer solvent may also be delivered to the Branch in containers. The unloading and loading of the fresh parts washer solvent and spent parts washer solvent from the tanker trucks occurs at Area C, as shown in Figure 2.1-2. The spent parts washer solvent arrives from customers in containers, and the containers are poured into the dumpsters in the return/fill station between the two buildings (Area A). The spent solvent is pumped from the dumpsters to the waste tank. A tanker truck removes the hazardous waste solvent on a periodic basis, and transports it to a permitted Safety-Kleen TSDF.

Immersion cleaner, paint wastes, spent solvent, petroleum naptha and perchloroethylene dry cleaning wastes may be managed as permitted wastes at the Tampa facility. These wastes are picked up from customers and off-loaded from route trucks at the south building docks, or the return/fill station. From there, they are placed in the appropriate container storage area in the south building (non-flammable or flammable storage area). On a regular basis, the containerized wastes are shipped to a permitted Safety-Kleen, or Clean Harbors TSDF.

Fluid Recovery Services (FRS) hazardous wastes are transfer wastes and can be stored up to a maximum of ten days on site. These wastes are transferred and stored in containers

within the flammable or non-flammable storage areas of the South building. Safety-Kleen selects the storage area to be utilized for these wastes based upon their compatibility with other transfer wastes present, as well as the specific DOT hazard associated with the material.

Used oil and antifreeze is picked up from customer locations and transported by Safety-Kleen oil trucks to the Tampa Transflo terminal (BIDS), 504B N. 34th St., Tampa, FL (FLR000105338) on a daily basis. The material is off-loaded into rail cars and sent to the Safety-Kleen East Chicago Indiana re-refinery. At times the material may be off-loaded at the branch into an above ground storage tank in the tank farm (Area C). A tanker truck transports used oil from the branch to the Tampa Transflo terminal on an as need basis, but at least every thirty-five days, as specified in 40 CFR 279.

Numeric values with respect to load bearing capacity of the roads leading to the facility are not available. However, the roads have been constructed as "local roads." According to the Florida Department of Transportation (FDOT), this indicates that there are no bridges and no restrictions. Trucks must fall under Florida's legal limits on loads. The facility and adjacent facilities have been in operation since at least 1985. The roads have been able to sustain the loads being transported over them since operations began.

Part I

- B. Site Information
- 4. SITE TOPOGRAPHY AND SURROUNDING LAND USE

Figure 2.2-1 is a USGS topographic map showing the facility. Due to the small size of the site, all of the information requested in FDEP's application form cannot be placed on one map. Therefore, additional maps are provided here to present the additional information requested in the application form. Specific information requested in the permit application is provided below.

100-Year Floodplain Area

Based on information available (Figure 2.2-2), the facility is located in Zone X. This is outside both the 1% (100-year), and 0.2% (500-year) annual chance flood area. No

Special flood management procedures are necessary.

Surface Water Bodies Within One-Quarter Mile of the Facility Property Boundary (e.g., Intermittent Streams and Springs)

There are at least three unnamed water bodies that appear to be retention ponds within ½ mile of the facility.

Surrounding Land Uses

Surrounding land uses are shown in Figure 2.2-3.

Legal Boundaries of the Facility

Figure 2.2-4 shows the property boundaries.

Drinking Water Wells Listed in Public Records or Otherwise Know to the Applicant Within One-Quarter Mile of the Facility Property Boundary

Information from FDEP's GIS application Map Direct at http://ca.dep.state.fl.us/mapdirect/?focus=none is found on Table 2.2-1.

Intake and Discharge Structures Within One Mile

There are no known intake or discharge structures within one mile.

Run-Off Control System

The facility's paved areas are sloped such that most rainwater run-off will be directed. To the ditch on the southern part of the site, which is connected to a retention pond. Any rainwater falling on the extreme north end of the property will be directed north to a

drainage ditch that runs parallel to 24th Avenue South. The retention pond and southern drainage ditch direct storm water to the east where the system connects with a drainage ditch that runs parallel to 54th Street. Figure 2.2-4 illustrates the contours and anticipated surface water run-off direction.

Access Control (fences, gates, etc.)

Figure 2.1-1 shows access control features.

Injection and Withdrawal Wells Both On Site and Off Site

There is one water supply well on site at the northeast corner of the Safety-Kleen property, shown on Figure 2.1-1. In addition, there are two other wells located within ½ mile of the facility; one at Southern Winding Service Inc., (Well# 14748, PWS# 6296084, Florida ID# AAH0327), and the other at Lamb of God, (Well# 29957, PWS# 6296222). Results of an inventory of wells within one-quarter mile of the site are presented in Table 2.2-1.

Buildings and Other Structures

Buildings and other structures are shown in Figure 2.1-1.

Contours Sufficient to Show Surface Water Flow

Figure 2.2-4 shows surface elevations at the facility. Anticipated surface water flow directions are shown in Figure 2.2-4.

Loading and Unloading Areas

Figure 2.1-2 shows loading and unloading areas in relation to the waste management areas.

Drainage or Flood Control Barriers

The facility's parking areas are sloped such that rainwater run-off will accumulate in the ditch on the southern part of the site, which is connected to the retention pond.

Hazardous Waste Units

Figure 2.2-5 shows hazardous waste management units.

Wind Rose

A wind rose for Tampa, Florida is shown in Figure 2.2-6.

Part I D. Operating Information

2. DESCRIPTION OF FACILITY OPERATION

Description of the Business

Safety-Kleen Systems, Inc. of Richardson, Texas is an international, service-oriented company whose customers are primarily engaged in automotive repair and industrial maintenance. Since 1968, Safety-Kleen has been offering a leasing service for petroleum-based hydrocarbon solvents and small parts washing equipment.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the Branch to the customer, from the customer to the Branch, from the Branch to the recycle facility, and then from the recycle center back to the Branch for redistribution to customers. This closed loop supplies Safety-Kleen with most of its solvent requirements (nearly two-thirds of the clean solvent delivered to the field has been previously used by its customers). Ownership of the solvent remains with Safety-Kleen. Solvent containers (product and waste) are transported in specially-equipped, enclosed route trucks. Three aboveground tanks are maintained at the Safety-Kleen Tampa facility for the storage of hazardous waste solvent, product 150 Solvent, and Used Oil.

The Safety-Kleen parts washing equipment, together with the solvents, are leased to customers; the leasing charge includes regularly scheduled solvent changes and machine maintenance. The business is conducted from local Branches (sales branches) located in 45 states. The Branches warehouse the products and equipment required to service the

customers in their sales areas. On a contractual basis, service representatives furnish clean solvent to the customers, pick up the used solvent, and ensure that the leased equipment is in good working order. In 1979, Safety-Kleen expanded their scope of operations to make their solvent leasing service available to owners of parts cleaning equipment, regardless of manufacturer, using Safety-Kleen's solvents.

Basically, Safety-Kleen handles two types of parts washers. The original service offered by the company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a container of parts washer solvent. On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the container of used solvent with one of clean product. Safety-Kleen has also established a parts cleaner service for users who own their machines. This service provides a solvent reclamation service to these customers regardless of machine model. All clean parts washer solvents are delivered to customers in containers. All spent parts washer solvents are transported from the customer to the Branch in containers.

Upon return of the spent solvent to the branch, the material is transferred from the containers to a wet dumpster. Most of the 150 solvent used by customers will be utilized by the Branch for the washing of used containers. After drums have been washed, the spent solvent is pumped into the hazardous waste solvent storage tank. Cleaned containers are filled with product solvent in preparation for the next day's services. Periodically, a tanker truck is dispatched from one of the permitted Safety-Kleen TSDF's to deliver a load of clean solvent and collect the spent solvent at the Branch. Containers of clean solvent may be stored at the return/fill station or in the permitted storage areas. Containers of waste solvent may be stored in the permitted storage areas.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container of the immersion cleaner. The spent solvent remains in the container after delivery to the Branch, where it may be stored in a transfer or permitted storage area of the warehouse. Periodically, a box trailer truck is dispatched from a permitted Safety-Kleen TSDF to deliver containers of fresh solvent and collect the containers of hazardous waste solvent for reclamation.

Warehouse space is dedicated for the storage of clean immersion cleaner. The immersion cleaner remains in the original covered containers during transfer between the Branch and the TSDF's.

Safety-Kleen provides a dry cleaning waste reclamation service where containers of dry cleaning wastes are collected and stored temporarily at the Branch before shipment to the permitted TSDF's for reclamation and processing. Dry cleaning wastes may be managed as permitted storage or 10-day transfer wastes. All dry cleaning wastes remain in their original containers while at the Tampa facility.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and stored temporarily at the Branch before shipment to permitted Safety-Kleen/Clean Harbors TSDF for reclamation and processing. Paint wastes may be managed as permitted storage or 10-day transfer wastes. All paint wastes remain in their original containers while at the Tampa facility.

Fluid Recovery Services (FRS) is a containerized waste program managed by the Safety-Kleen Branch. Under this program, other types of waste are collected by the Branch and sent to Safety-Kleen/Clean Harbors permitted TSDF's. Hazardous wastes managed under this program are managed as 10-day transfer wastes. Examples of the types of waste that may be received from FRS customers include, but are not limited to:

- 1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naphtha, etc.
- 2. Lubricating oils, hydraulic oils, synthetic oils, antifreeze, and machine oils.
- 3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane.
- 4. Photographic and x-ray related wastes.
- 5. Paint and lacquer thinners.
- 6. Other hazardous and nonhazardous halogenated and nonhalogenated wastes.

Note: All waste containers are unloaded within 72 hrs. of arrival at the facility and are shipped outbound within 72 hrs. of being loaded for shipment.

10-Day Transfer Storage Areas

10-day transfer container storage takes place in the south building and the flammable storage room. Signage clearly marks the rows in which 10-day transfer containers are stored. All hazardous waste containers located in the 10-day transfer area(s) are manifested and in-transit to other permitted facilities. Safety-Kleen Tampa is not the designated facility for wastes located in the 10-day transfer area(s).

Safety-Kleen offers a service for the collection of bulk used oil commonly referred to as Safety-Kleen Oil Services (SKOS). Straight tanker trucks are used to collect and transport bulk used oil. After collection, the used oil is transported to the Tampa Transflo Bidsite and off-loaded into a rail car for storage, or off-loaded into the used oil storage tank at the branch and then transported to the Tampa Tansflo Bidsite. The used oil is then transported via rail to the Safety-Kleen East Chicago, IN re-refinery for processing. Used oil is subject to specific acceptance criteria prior to collection, and divided into three (3) groups.

Group 1 used oils are derived from automotive sources (auto maintenance, auto retail, dealerships, fleet rental & leasing, quick lubes, marine transportation, mechanical & equipment service, taxi/bus/other local transportation, airlines, railroads, trucking & transportation companies, utilities – natural gas & propane distribution, telecommunications/cable, and water/sewer, etc.) Prior to collection, used oil at these sites is field tested using a TIF Halogen Leak Detector. Used oil failing the TIF test for SQG/LQG generators will then be tested using the Dexsil Clor-D-Tect kit. Used oil passing this test may be collected, and used oil failing this test may not be collected. It may be collected at a later date, provided a sample of the used oil has passed the rebuttable presumption for used oil using an analytical method from SW-846.

Group 2 used oils are derived from non-automotive sources and may be acceptable if they receive approval from the Central Profile Group (CPG). Examples of group 2 oil sources

are: (utility – electrical distribution/power generation, agricultural production, chemical manufacturing/distribution, electrical equipment & computer manufacturers, exploration – drilling/seismic, fabricated metal products, manufacturers – furniture/millwork/cabinets, fixtures/machine (including medical)/miscellaneous, mining/minerals, primary metal manufacturing, natural gas pipeline/processing, manufacturers – plastic/rubber/glass, oil & gas producers, oilsands mines/SAGD facilities, food & kindred products, manufacturers – asphalt/paper products & packaging materials/shoe/leather/textiles & apparel, printing, lumber/wood products, lumber mills, pulp & paper mills, biotechnology, pharmaceutical, refineries, ship builders, steel mills, asphalt terminal, liquid/petroleum, pipeline, liquid/petroleum terminal, manufacturers – transportation equipment, etc.) Group 2 used oils require a pre-qualification sample to be taken and submitted for analysis (Flash point, PCB's, Halogens, Silicone, and VOC's). Pre-qualification results must be approved prior to initial collection. If the generating process changes, or if no oil is picked up for over one year, a pre-qualification sample must be submitted for approval again. Field testing procedures are the same as the above group 1.

Group 3 are any oils not falling into the Group 1/2 categories, and will not be accepted into the SKOS program. Examples of Group 3 oils are, but not limited to: (electrical insulating oil/transformer oil, gasoline, form release oil, rust preventatives, silicone heat transfer fluid, hydraulic oil dye, diesel fuel treatment, motor flushes, penetrating oil, kerosene, cooking oil, crude oil, distillate fuels, animal fats, TSCA regulated oils, urethane coating, etc.)

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. This service is offered in conjunction with Safety-Kleen's used oil collection service. All used antifreeze collected and managed by Safety-Kleen within Florida is recycled. The trucks used to collect and transport waste ethylene glycol are the same trucks used for collection and transportation of used oil. At the customer's location, Safety-Kleen pumps used antifreeze and transports the material to the branch, or Tampa Transflo Bidsite, for off-loading into a tank, or rail car for storage. The ethylene glycol/used oil mixture is transferred by rail to the Safety-Kleen re-refinery in East Chicago, Indiana, where the ethylene glycol is extracted from the oil by distillation. After separation, the ethylene glycol is shipped to a glycol refinery for additional purification into a pure product which is then sold on the open market. This

procedure is in accordance with FDEP's *Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. There is no bulk storage vessel at the facility specifically designated for used antifreeze at this time.

In 1996, the Branch became registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the requirements of Florida Administrative Code (FAC) 62-737.400. As a registered small quantity handler of universal waste lamps/mercury devices, the Branch can store up to 2,000 kg of lamps or 100 kg of mercury devices at any one time. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as non-hazardous transfer wastes. The boxes are stored at the Branch in a designated area. All containers (boxes) are labeled in accordance with FAC 62-737.400(5)(b), and are partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic. Safety-Kleen handles all types of batteries with the exception of lithium batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting these standards may be managed as 10day transfer hazardous waste.

Containers of hazardous waste are picked up at customer locations and transported back to the Branch in route trucks. Each route truck is equipped with a hand-truck and electric lift gate for movement of containers. Upon arrival at the Branch, containers are placed on pallets and moved by forklift to the appropriate areas for storage within 24 hrs.. Containers of used parts washer solvent are unloaded at the return/fill area and are dumped by hand into the wet dumpster for transfer via piping to the hazardous waste used solvent tank. Forklifts are used for loading containerized hazardous waste containers onto trucks for transport to permitted Safety-Kleen/Clean Harbors TSDF's.

Continued Use Program

Safety-Kleen requested approval of the Continued Use Program from the Department in 1999. The request was to divert a portion of used mineral spirits (parts washer solvent) from qualified customers, and place it in a nearby holding tank (CUP Vat) to be used for the chemical and mechanical cleaning of incoming hazardous waste mineral spirits drums. Safety-Kleen intent was, and remains, to apply these used mineral spirits as an effective substitute for commercial chemical products in accordance with 40 CFR 261.2(e)(1)(ii) for drum cleaning operations. The Department approved the program in a letter dated October 25, 1999 contingent on adherence to conditions therein. Those conditions are documented in the permit modification, dated October 4, 2000, issued to the Safety-Kleen Tampa facility. The Continued Use Program (CUP) uses Safety-Kleen mineral spirits parts washer solvent that is removed from a customer's location as product for drum washing at the Safety-Kleen branch. This material is picked up from the customer location as a product and returned to the branch, where it is dumped into a designated CUP vat. The solvent is then pumped to the drum washer to clean dirty parts washer solvent drums. Once the solvent has completed the cleaning process it is pumped from the drum washer to the hazardous waste solvent tank.

Safety-Kleen constructed the Tampa Branch with the intent that it will be a long-term facility for the distribution of Safety-Kleen products. No on-site disposal activity occurs at the facility and, hence no disposal capacity will be exhausted that will necessitate closure of the facility. Based on the current business and facility conditions, the Tampa facility is expected to remain in operation at least until the year 2035.

PART I D. 3. Process - Codes and Design Capacities

Waste Type	Process Design Capacity (Gallons)	Process Code(s)	Estimated Annual Amt. (Tons)	Waste Codes
Spent Parts Washer	15,000	S01*	813	D001 and D-codes
Solvent		S02**		listed in
				Note below
Branch-Generated	12,749	S01*	17	D001 and D-codes
Liquids				listed in
Solids (Debris)				Note below; F002, F003, F005
Dumpster Sediment	12,749	S01*	Included	D-codes listed in note
			above	below
Tank Bottoms	12,749	S01*	Included	D-codes listed in note
			above	below
Used Immersion Cleaner	41,220	S01*	28	D-codes listed in note
(IC 699)				below
Dry Cleaning Waste	41,220	S01*	300	F002 and D-codes
(Perchloroethylene)				listed in note below
Dry Cleaning Waste	12,749	S01*	Included	D001 andD-codes
(Naptha-Based)			above	listed in note below
Paint Wastes	12,749	S01*	69	D001, F003, F005 and
				D-codes listed in note
				below
Retain Samples From Used Oil Operations	41,220	S01*	3	D008, D018, D039, D040
Spent Aerosol Cans	12,749	S01*	> 1	D001, D035
Fluid Recovery Service (FRS)	21,120	S01***	250	Transfer wastes-waste codes assigned by generator
Aqueous Brake Cleaner	41,220	S01***	20	Transfer wastes – none, unless assigned by generator
Mercury-Containing Lamps/Devices	N/A	N/A***	Less than 2.2	N/A-handled as non- hazardous transfer wastes

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

- * This waste will be stored in containers in the north or south building container storage area. The maximum capacity in the north container storage area is 5,200 gallons. The maximum capacity in the south container storage area is 12,749 gallons of flammables and 41,220 gallons of nonflammables. Note: The north building container storage area is not currently being used for storage of wastes, and will not be used without prior approval from the FDEP.
- ** The spent parts washer solvent storage tank has a capacity of 15,000 gallons and may be filled to 14,250 gallons
- *** This waste will be held for transfer in containers in the transfer area(s)

Part II

A. General

1. SITE TOPOGRAPHY AND SURROUNDING LAND USE

Figure 2.2-1 is a USGS topographic map showing the facility per 40 CFR Part 270.14(b)(19). Due to the small size of the site, all of the information requested in FDEP's application form cannot be placed on one map. Therefore, additional maps are provided here to present the additional information requested in the application form. Specific information requested in the permit application is provided below.

100-Year Floodplain Area

Based on information available (Figure 2.2-2), the facility is located in Zone X. This is outside both the 1% (100-year), and 0.2% (500-year) annual chance flood area. No special flood management procedures are necessary.

Surface Water Bodies Within One-Quarter Mile of the Facility Property Boundary (e.g., Intermittent Streams and Springs)

There are at least three unnamed water bodies that appear to be retention ponds within ¼ mile of the facility.

Surrounding Land Uses

Surrounding land uses are shown in Figure 2.2-3.

Legal Boundaries of the Facility

Figure 2.2-4 shows the property boundaries

Drinking Water Wells Listed In Public Records or Otherwise Known to the Applicant Within One-Quarter Mile of the Facility Property Boundary

Information from FDEP's GIS application Map Direct at http://ca.dep.state.fl.us/mapdirect/?focus=none is found on Table 2.2-1.

Intake and Discharge Structures Within One Mile

There are no known intake or discharge structures within one mile.

Run-Off Control System

The facility's paved areas are sloped such that most rainwater run-off will be directed to the ditch on the southern part of the site, which is connected to a retention pond. Any rainwater falling on the extreme north end of the property will be directed north to a drainage ditch that runs parallel to 24th Avenue South. The retention pond and southern drainage ditch direct storm water to the east where the system connects with a drainage ditch that runs parallel to 54th street. Figure 2.2-4 illustrates the contours and anticipated surface water run-off direction.

Access Control (fences, gates, etc.)

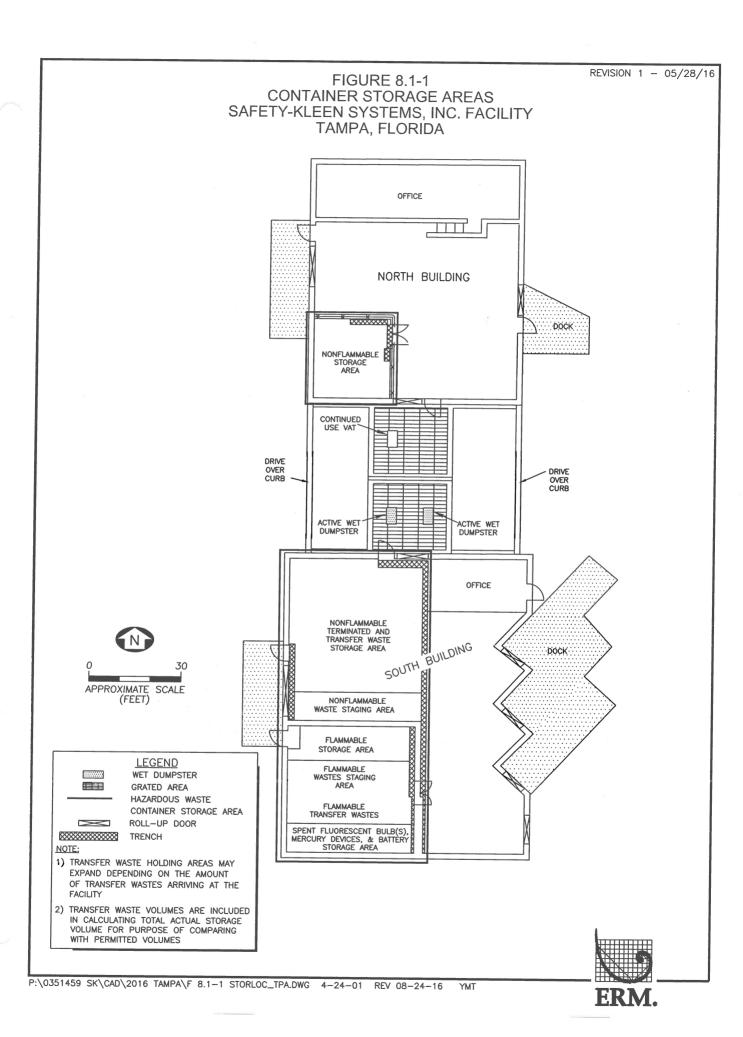
Figure 2.1-1 shows access control features.

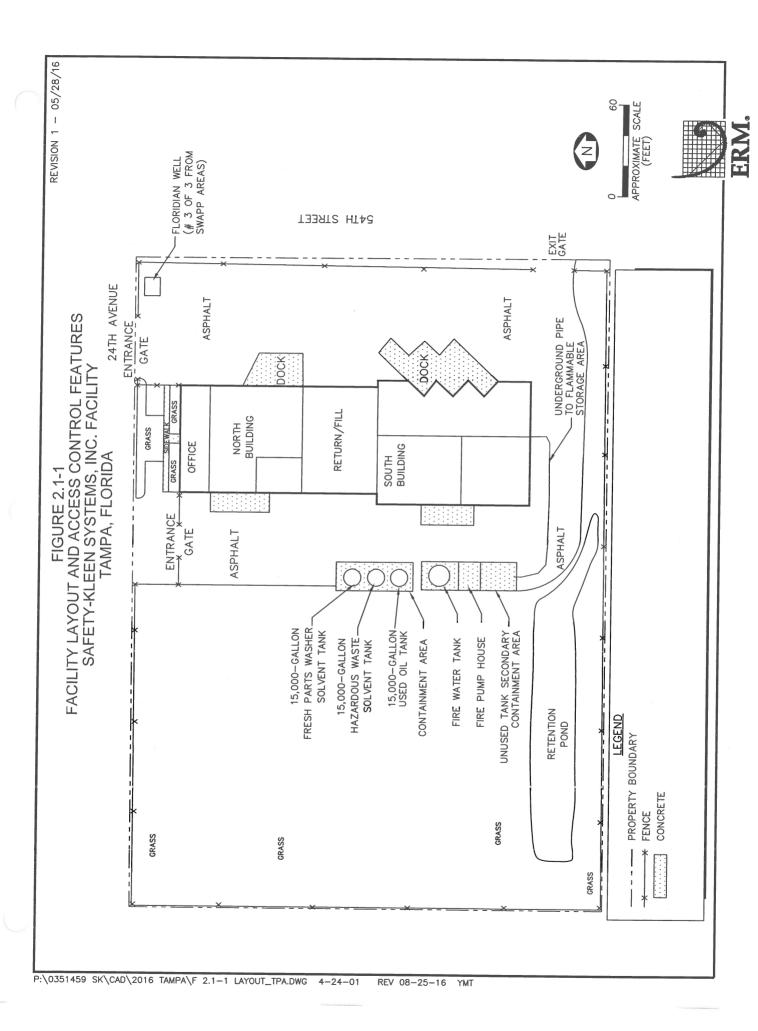
Injection and Withdrawal Wells Both On Site and Off Site

There is one water supply well on site at the northeast corner of the Safety-Kleen property, shown on Figure 2.1-1. In addition, there are two other wells located within ½ mile of the facility; one at Southern Winding Service Inc., (Well# 14748, PWS# 6296084, Florida ID# AAH0327), and the other at Lamb of God, (Well# 29957, PWS# 6296222). Results of an inventory of wells within one-quarter mile of the site are presented in Table 2.2-1.

Buildings and Other Structures

Buildings and other structures are shown in Figure 2.1-1.





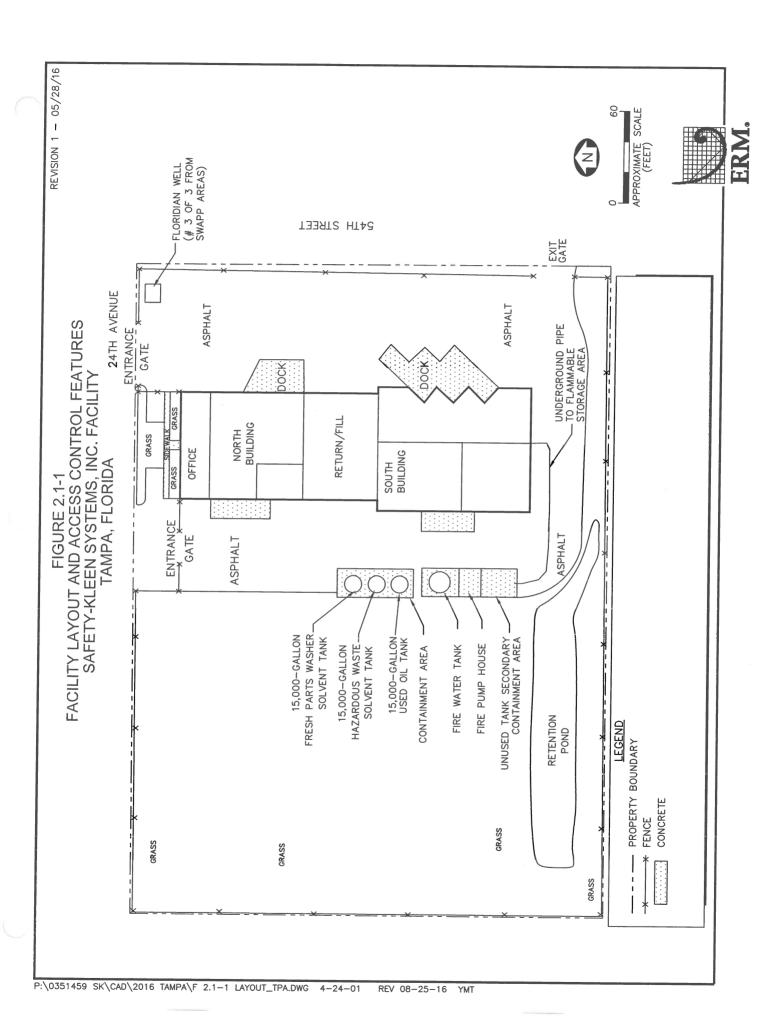


FIGURE 2.2-7 WELL SEARCH MAP SAFETY-KLEEN SYSTEMS, INC. FACILITY TAMPA, FLORIDA





SAFETY-KLEEN SYSTEMS, INC.

Consent Resolution of the Directors

June 18, 2014

The undersigned, being all of the Directors of Safety-Kleen Systems, Inc., a Wisconsin corporation (the "Company"), hereby consent to and adopt the following resolutions effective as of the above date.

Resolved:

That each individual with the title of President, Senior Vice President, Vice President, Director, Manager or Member of the Company, or any of its subsidiaries, shall have the power and authority to sign, certify, and deliver on behalf of the Company or any subsidiary, any necessary or desirable environmental documents, including, without limitation, any permit applications or amendments and any environmental reports in any way related to the operations of the Company or its subsidiaries. In addition to the foregoing, to the extent that the Company operates any facility with more than 250 people or having gross annual sales or expenditures in excess of the \$25,000,000, the General Manager of such facility shall have all of the foregoing authority with respect to the operations of any such facility.

Resolved:

That the President, and any Senior Vice President, Vice President or Secretary or Assistant Secretary of the Company may designate an employee of an affiliated company to sign and certify, on behalf of the Company or any subsidiary, any necessary or desirable environmental documents, including, without limitation, any permit applications, transportation related documents and environmental reports in any way related to the operations of the Company or one of its subsidiaries.

Resolved:

That the Secretary or any Assistant Secretary of the Company is hereby authorized on behalf of the Company to certify as to who are the officers of the Company and to the due authority of any officer or other person executing any of the foregoing documents or any other documents on behalf of the Company, and any governmental official or other third party shall be entitled to fully rely on any such certification.

WITNESS the execution hereof under seal as of the date first above written.

Eric Gerstenberg, D

own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is shipped to SK distribution centers, and then shipped to 3rd party recyclers.

Safety-Kleen offers a used oil collection service commonly referred to as Safety-Kleen Oil Services (SKOS). Used oil is collected by straight tanker trucks and transported to the Tampa Transflo Bidsite for storage in a railcar, or to the branch for storage in a 15,000 gallon above ground storage tank. Used oil brought back to the branch will ultimately be transported to Transflo to be off-loaded into a railcar. The used oil is then shipped via railcar to the Safety-Kleen East Chicago, IN re-refinery for processing. The branch is registered in Florida as a used oil transporter, and transfer facility.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and are located in the permitted container (flammable storage room) storage or 10-day transfer area. Paint wastes are normally received at the Branch on manifests which are terminated at another Safety-Kleen/Clean Harbors facility.

The FRS wastes are packaged in polyethylene or steel containers which are not opened until they reach a permitted Safety-Kleen/Clean Harbors TSDF. The FRS wastes are transfer wastes and may be located onsite for up to 10 days. The FRS wastes may also undergo branch-to-branch or truck-to-truck transfer. This transfer will occur at the return/fill station inside secondary containment.

The waste products exhibit essentially the same biological, physical, and chemical properties as the fresh product. Used products are basically fresh products with impurities of dirt and metals. Safety Data Sheets (SDSs) for each hazardous material are available at the Branch and on demand by fax through a company-owned SDS information service. This service provides 24-hour phone or fax access to an extensive SDS database.

The Branch is registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the requirements of Florida Administrative Code (FAC) 62-737.400, including all training

requirements. As a registered small quantity handler of universal waste lamps/mercury devices, the Branch can only store up to 2,000 kilograms of lamps or 100 kg of mercury-containing devices at any one time. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as non-hazardous transfer wastes. The boxes/lamps are stored at the Branch in a designated area within the transfer waste storage area, and labeled according to FAC 62-737.400(5)(b). This storage area is partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic. Figures 5.1-1 and 5.1-2 show the basic site and floor plans and the locations of waste management facilities and facility storage. Table 5.1-1 provides information regarding permitted/transfer/site generated wastes handled at the facility.

Safety-Kleen handles all types of batteries with the exception of lithium batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting these standards may be managed as 10-day transfer hazardous waste.

Note: All waste containers are unloaded within 72 hrs. of arrival at the facility and all waste containers are shipped outbound within 72 hrs. of being loaded for shipment.

INSPECTION PROCEDURES

Inspection of Safety Equipment

The purpose of the inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of emergency and spill control equipment to ensure proper operation, and to maintain compliance. Table 5.2-1 is an Inspection Schedule.

The Branch Manager or designee, using the Weekly Inspection Log (Figure 5.2-1 or similar), is responsible for carrying out the inspection in accordance with the following procedure and schedule.

A weekly inspection of fire extinguishers must be performed to ensure that the tag date
has not expired and the units are properly charged and accessible.

- A weekly inspection of eyewash stands must be performed to assure accessibility, and proper operation of this equipment. Inventory of the first-aid kit must be checked on a weekly basis.
- A weekly check of the supply of spill control equipment (absorbent material) must be performed.
- A weekly check of the conditions and inventory of other emergency equipment will be made. This includes gloves, aprons, goggles, respirators, and other personal protective equipment.
- A weekly check of the condition and inventory of communication devices will be made.
 This includes telephones, intercom, and emergency alarms.

Inspection of Security Equipment

The Branch Manager or designee, using the Weekly Inspection Log (Figure 5.2-1 or similar), inspects the security features of the facility weekly (e.g., gates and locks), looking for any evidence of sticking, corrosion, or unusual activity. The facility fence will be checked weekly for deterioration, gaps, and broken wire ties. Facility signage will be inspected for clarity.

Inspection of Waste Management Facilities

The purpose of the inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of hazardous waste management and other material management facilities to ensure proper operation and maintain compliance. Table 5.2-1 provides an Inspection Schedule.

The Branch Manager or designee, using the Daily Inspection Log inspection sheets, is responsible for carrying out the inspections of all hazardous waste management facilities in accordance with the following procedure and schedule. Daily inspections of aboveground tanks will include the following:

• Observe tank exterior for loose anchoring, wet stops, and leaks.

- Check the automatic high level alarm. In addition, measure the depth of used solvent in the tanks to confirm the proper functioning of the automatic alarm system and to determine unexpected deviations in tank measuring data, or a sudden drop in liquid level, which may indicate leakage.
- Inspect tank farm secondary containment walls and piping/piping supports from the return/fill to the tank farm. Check for evidence of failure (e.g., distortion, corrosion, paint failure, other).
- Inspect transfer pumps for leaking seals and overheated motors.
- Inspect the solvent dispensing hose, fittings, and valve for any leaks, damage, or wear that could cause a leak to develop.
- Inspect the valves for proper seat. Stem leaks from worn glands and warped valve bodies should be repaired. If the valve cannot be repaired, replace the unit.

Also, the tanks will be visually inspected and tested periodically.

Daily inspection of the solvent return receptacles (wet dumpsters) will consist of an inspection for leaks and excess dumpster mud build-up.

Daily inspections of the container storage area include the following:

- Verify that total volume is within permitted limits.
- Physically examine the condition of containers to verify that leaks have not occurred since the last inspection.
- Verify that all container identification, dates, and hazardous waste labels are attached and current.
- Inspect container placement and stacking such as aisle space, height, and stability of stacks.

- Examine containment areas to detect signs of deterioration and failure of the containment system such as cracks, breakage, settlement, and spillage.
- Inspect any containers located on trucks awaiting unload or departure 72-hr. grace period for unloading or departure of containers at the facility.

Corrective Action

Any discrepancies or deficiencies found during routine inspections will be recorded in the inspection log and brought to the attention of a supervisor. At this time an evaluation of the seriousness of the problem will be noted and a decision made if the situation requires immediate action or the problem can be handled as routine maintenance. The evaluation of the seriousness of the problem will be recorded in the facility's inspection log. If the problem poses a threat to human health or the environment, action will be taken immediately. The Branch Manager has the overall responsibility for resolving any discrepancies found during the routine inspection.

EMERGENCY NOTIFICATION

Emergency Coordinator

The Branch Manager or designee is the emergency coordinator. Page iii at the beginning of the plan includes the names, home addresses, and both office and home phone numbers of the primary emergency coordinator and alternate. At least one employee will be either present on the facility premises or on call with responsibility for coordinating all emergency response measures at all times. This primary emergency coordinator and alternate emergency coordinator are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out the contingency plan.

EMERGENCY RESPONSE AGENCIES AND TEAM MEMBERS

The agencies and response team members to be notified whenever an imminent or actual emergency occurs are presented on page iii, located at the beginning of this plan.

ACTIONS OF THE EMERGENCY COORDINATOR

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or the designee when the emergency coordinator is on call) must immediately:

- a. Notify all facility personnel present of the emergency. The relatively small size of this facility makes direct verbal communication the most expedient form of emergency notification. The emergency coordinator may also elect to proceed to the front of the building and repeatedly sound a car horn to notify building occupants of an emergency. A head count will be performed by the emergency coordinator.
- b. Notify appropriate state or local agencies with designated response roles if their help is needed.
- c. Summon the primary emergency coordinator, if that person is absent.

Whenever a release, fire, or explosion occurs, the emergency coordinator must immediately identify the character, exact source, amount, and areal extent of any released materials. Because of the limited types of chemicals in storage, the identification processes can easily be performed visually.

Procedure for Assessing Possible Hazard to the Environment and Human Health

After identification of the character, source, amount, and extent of a release, fire, or explosion, the emergency coordinator must decide whether the situation can be contained or cleaned up by plant personnel and equipment.

Tank Spills or Leakage

Aboveground tanks are underlain by a concrete slab and surrounded by a concrete dike to contain any spilled or leaked solvent. The containment system has been sized in accordance with the regulations, and the material will be totally contained under most spill conditions. Should a spill occur, arrangements must be immediately undertaken to recover the material. In the event of leakage, tank repair or replacement will be initiated. Any soil that may be involved must be removed and handled in the same manner as the material spilled.

40 CFR Part 264.196(d)(2) exempts spills equal to or less than one pound, and that are immediately contained and cleaned up.

Spill Control Procedures

If a solid or hazardous waste, or hazardous material discharge occurs:

- 1. Stop the discharge, if possible, by immediately transferring the liquid to a good container. If the discharge involves a tank, immediately close all valves to the tank.
- 2. Retain, contain, or slow the flow of the material, if possible, by diking with sorbent pad or dirt. Based on the seriousness of the incident, the emergency coordinator will select the level of personal protective equipment required to address the incident. Pump and mop up the liquid from the floor into a good container and return the container to storage for subsequent shipment to a Safety-Kleen/Clean Harbors recycle center for reclamation/disposal. The area and equipment that comes in contact with the spill must be decontaminated with soap and water. All residues resulting from containment and decontamination will be collected for proper characterization.
- 3. If the material escapes the containment efforts, immediately call the 24-hour Safety-Kleen emergency number with response time less than two hours (page iii). Record the date, time, and name of person taking the message. The State Warning Point ((850) 413 -9911) is to be contacted as soon as possible, but no later than within one working day of discovery of the release. If a release equals or exceeds the Reportable Quantity (RQ) the National Response Center ((800) 424-8802) is to be contacted within 15 minutes.

4. Immediately recover spilled solvent to reduce property and environmental damage using the emergency and safety equipment stored onsite for such situations (Figure 5.6-1 and Table 5.6-1), or call in emergency response contractors (page iii). Start recovery operations immediately.

After recovery of spilled solvent, wash all contaminated impervious surfaces and equipment with soap and water. The residue of spill- or fire-contaminated soils and waste waters must be removed and disposed of at a Safety-Kleen/Clean Harbors recycle center. In addition, the recovered solvent will be sent to a Safety-Kleen/Clean Harbors recycle center for reclamation.

5. The person reporting a spill should be prepared to give their name, position, company name, address, and telephone number. The person reporting also should give the nature of the material spilled (e.g., immersion cleaner, etc.) and, if possible, some estimate of the amount, and whether it is near a stream or could enter a stream by flowing through ditches or storm sewers.

If assistance is needed, the emergency coordinator should describe the containment status and specify any additional equipment needed. When reporting a spill, record the date and time of the call and the name of the person answering the call at the above number. Spill prevention plans are reviewed with facility personnel every year, and records of the training are kept at the facility.

Spill/Release Response to Solid (Physical State) Waste(s)

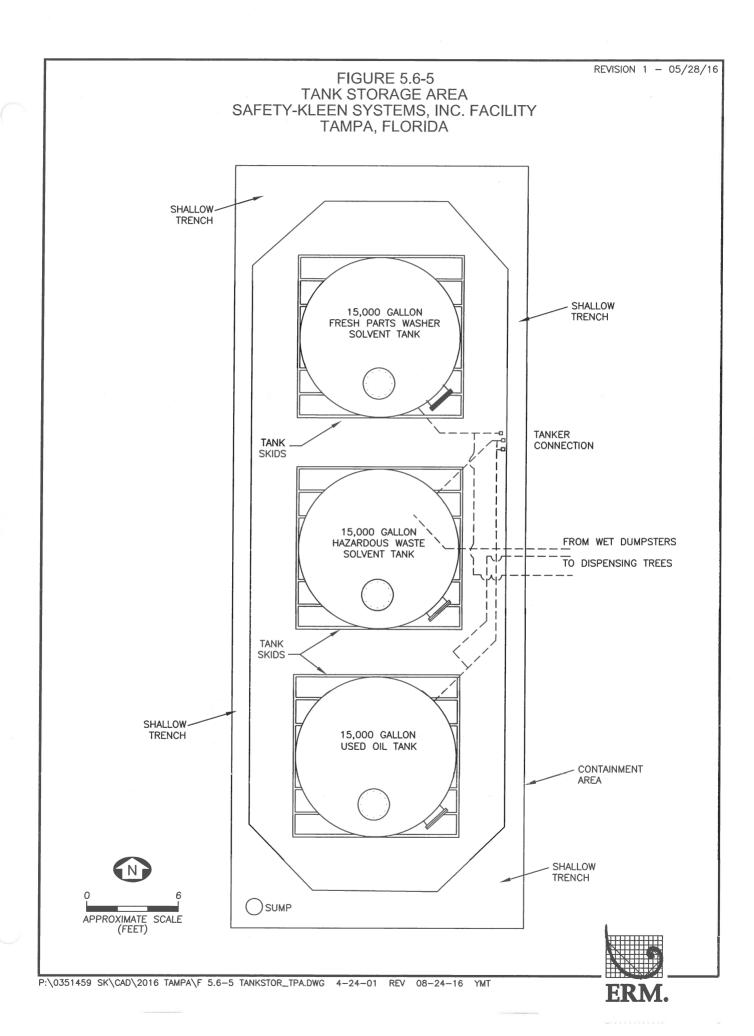
Response to a non-liquid waste (solid physical state) will require the use of a shovel to place the material into a new container. If the material is powder-like/particulate matter care should be taken so as not to create dust or cause the material to become airborne. After the bulk of the material is recovered a damp absorbent pad may be used to clean up residual material that cannot be captured with the shovel.

The floor does not have intentional sloping. Any small spill that might occur would puddle where it was spilled. The spilled material would be cleaned up where it puddles or be manually directed to the containment trench. In the event that a large spill were to occur, some dispersion would be expected to occur based on the direction, force, and pathway obstacles presented by and to the spill. The trenches would intercept and capture liquid exiting the only openings in the berms (curbing). The containment trenches in the southernmost container storage area are connected to the external containment area located south of the fire water tank. Outside the containment areas the wastes would flow onto the concrete surfaces. These are the same concrete surfaces that serve to protect soils and ground water from contamination due to spills occurring during loading/unloading. The concrete areas around the loading docks have no intentional slope. Again, small spills would puddle, while larger spills could be manually directed to the containment trenches.

In the container storage area, containers are handled with a fork-lift and/or a hand-truck free of sharp points and stacked by hand. Every time a container is moved, the possibility exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, container lids are secured and containers are kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into a safe container. Each route truck is equipped with a lift gate or an electric hoist. The appropriate device is used in the loading/unloading operation to minimize chances for spillage and/or employee injury. Containerized wastes at the Tampa facility are loaded/unloaded in the vicinity of the contained concrete dock on the southeast side of the building (Figure 5.1 2) and return/fill dock. Because these areas are fully enclosed, spills originating in these areas should not come in contact with stormwater.

FRS Wastes/Transfer Wastes

Transfer wastes will be located in the areas depicted in Figure 5.6-3. The containment system in the warehouse is coated, free of cracks, and is sufficiently impervious to prevent seepage into or through the concrete. FRS wastes are 10-day transfer only. They are not required to have containment, though they are stored in areas with containment. These areas are fully enclosed within the building. Spills in these areas should not come into contact with stormwater.



Materials are handled so they do not:

- a. Generate extreme heat or pressure, fire or explosion, or violent reaction.
- b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health.
- c. Produce uncontrolled fires or gases in sufficient quantities to pose a risk of fire or explosion.
- d. Damage the structural integrity of the Safety-Kleen facility.

Adequate aisle space is maintained to allow unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

External Factors

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel. Also, the container storage areas are in buildings which are inaccessible to unauthorized personnel.

- 1. Vandalism Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in a previous section of this Plan.
- 2. Employee Strikes A strike would not result in a solvent spill or fire.
- 3. Power Failure A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.

- If possible schedule solvent tanker in a manner, which would allow the maximum volume of liquid to remain in the storage tanks as the structural integrity of a tank increases with content volume. Cam-lock all ends of hose fittings and turn off valves at the storage tanks.
- After all preparation has concluded, all employees should be sent home and the facility secured. Turn off main breaker.

Hurricane Warning

- All employees are excused from work if their county of residence is put under a hurricane warning. However, the branch manager or other key personnel may be available to perform some last minute activities if weather permits.
- Notification, via incident alert system or telephone, that a hurricane warning has been posted.
- Walk-around of facility to ensure all preparation work conducted under the hurricane watch has been completed.
- Completion of any remaining items that were not finished.

Following Hurricane

- Depending on the intensity of the storm, the following actions should be carried out as soon as conditions permit.
- Employees should phone-in, following local government employee guidelines, for returning to work.
- Branch manager and/or the emergency coordinator should be the first people to enter the
 facility. Perform a complete walk-around of the facility checking for security of
 premises, waste management areas, determine if there are any safety issues that pose risk
 for employees, inspect for any damage, looting, or theft and generate a list of items to
 report.

EVACUATION PLAN

In an uncontrolled emergency, all persons are to be evacuated from the area by means of a verbal cry or use of the public address system. Evacuation routes and the gathering point are noted on Figure 5.6-6 in this plan. The emergency coordinator may elect to use a car horn as a means of emergency notification. A head count will be performed by the emergency coordinator at the gathering point to ensure all personnel, and any contractors or visitors are accounted for.

Figure 5.2-1

INSPECTION SHEET FOR:

Weekly Inspection of SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES, AND MISCELLANEOUS EQUIPMENT

Inspector's Name/Title:	oector's Signature:
-------------------------	---------------------

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Init:	Init:	Init:	Init:	Init:	Init:	Init:
Date:	Date:	Date:	Date:	Date:	Date:	Date:
Time:	Time:	Time:	Time:	Time:	Time:	Time:

SAFETY AND EMERGENCY EQUIPMENT

Item	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Fire Extinguishers	A N	A N	AN	A N	A N	A N	A N
If "N", circle the approp	riate problem: over	due inspection, inac	lequately charged, i	naccessible, other.			
Eyewash and Showers	AN	AN	AN	A N	A N	A N	AN

If "N", circle the appropriate problem: disconnected or malfunctioning valves, inadaquate pressure, inaccessible, malfunctioning drain, leaking, other

First Aid Kits A N A N A N A N A N

If "N", circle the appropriate problem: inadequate inventory, other.

	Equipment	Α	N	Α	N	Α	N		A N		A	N		Α	N	Α	N
	If "N", circle the appropri	ate probl	em: <u>inad</u>	equate supp	oly of sorb	ent, tow	vels, and/	or clay	<u>inaded</u>	uate	supply :	of shovels	, mops,	empty	y drums	wet/dry	vacuum,
9	other.																

√", circle the appropriate problem: inadequate supply/malfunctioning aprons, gloves, glasses, respirators, items requiting security or clean environment

exposed, other Communication N N N N A A A A N A N A N **Devices**

If "N", circle the appropriate problem: inadequate supply of telephones/ intercom/ emergency alarm, telephones are not located where needed, other.

SECURITY DEVICES

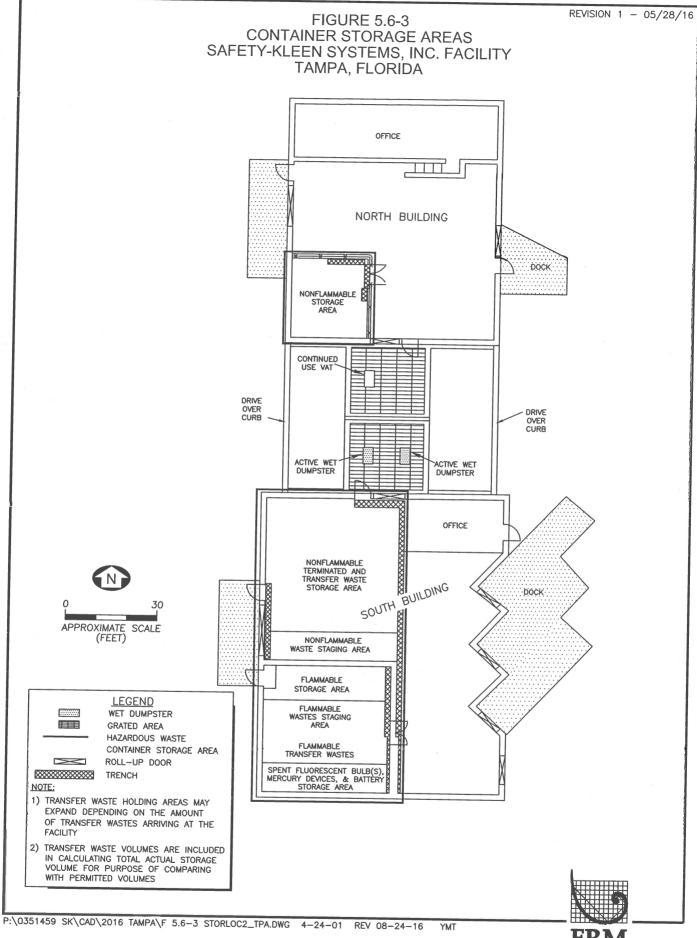
Item	ioM	nday	Tue	sday	Wedn	esday	Thu	rsday	Fri	day	Satı	ırday	Sur	nday
Gates and Locks	Α	N	Α	N	Α	N	Α	N	Α	N	Α	N	A	N
"N", circle the approp	riate probl	em: stick	ing, corros	sion, lack	of warning	g signs, fit	, other.							

MISCELLANEOUS EQUIPMENT

Item	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Dry Dumpster	A N	A N	A N	A N	A N	A N	A N
If "N", circle the appropr	iate problem: split s	seams, distortion, o	leterioration, excess	debris, liquids in u	ınit, other.		-

FIRE PUMP TEST - Pressure Reading Acceptable

OBSERVATIONS, COMMENTS, DATE, AND NATURE OF REPAIRS TO ANY ITEMS INDICATED AS "NOT ACCEPTABLE":	



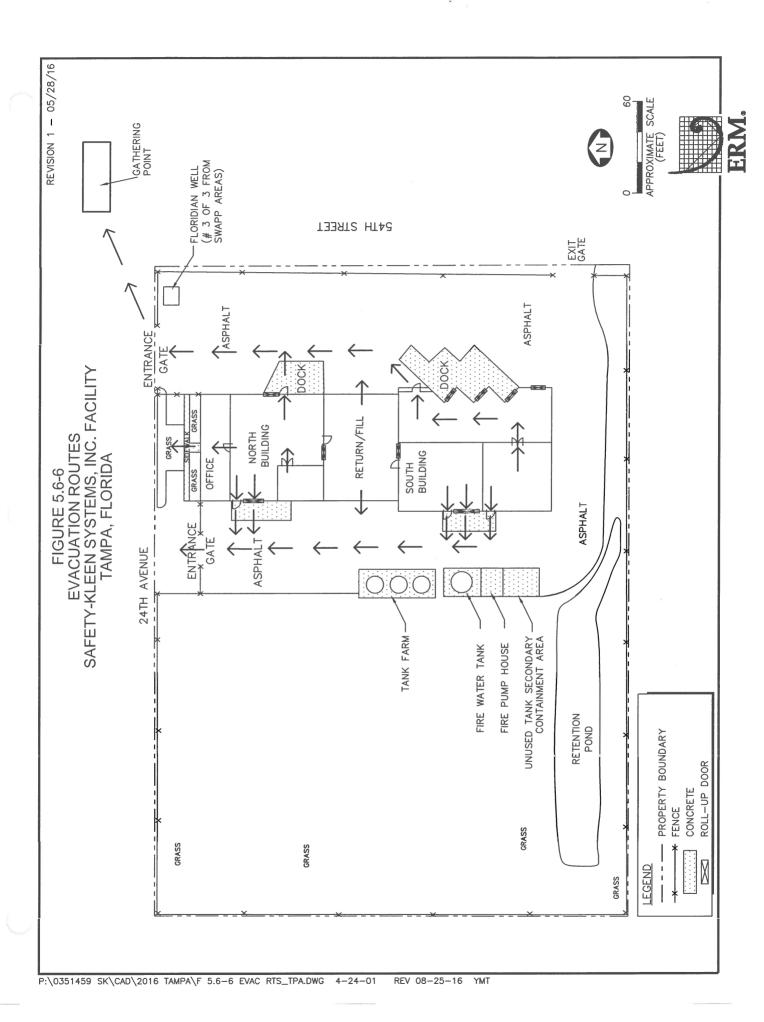


Table 5.2-1

Area/Equipment	Specific Item		Types of Problems	Frequency of Inspection
Safety Equipment	Fire Extinguishers	• • •	Overdue inspection Inadequately charged Inaccessible	Weekly
	Eyewash	• • •	Disconnected/malfunctioning values Pressure Inaccessible	Weekly
	First-Aid Kit		Inadequate inventory	Weekly
	Spill Cleanup Equipment	•	Inadequate supply of sorbent, towels, shovels, mops, empty drums	Weekly
	Personal Protection Equipment	•	Inadequate supply of aprons, glasses, respirators	Weekly
	Communication Devices	•	Telephones working properly, intercom functional	Weekly
Security Equipment	Gates and Locks	•	Sticking corrosion, lack of warning signs	Weekly
	Fence	. •	Broken ties, corrosion, holes, distortion	Weekly
Storage Tank System-	Volume in Tank	•	Must never be more than 95 percent full	Each operating day
Storage Lanks	Tank Exterior	•	Rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion	Each operating day
	High Level Alarms	•	Malfunctioning siren/strobe light	Each operating day
	Volume Gauges Above Ground Piping	• •	Disconnected, sticking, condensation failure, distortion, corrosion, paint failure, leaks, failure of supports	Each operating day Each operating day
Secondary Containment	Bottom and Walls	•	Cracks, debris, ponding, wet spots/stains, deterioration, displacement, leaks	Each operating day
	Rigid Piping and Supports	•	Distortion, corrosion, paint failures, leaks	Each operating day
	Self Closing Drain Valve	•	Open, leaks	Each operating day

Area/Equipment	Specific Item		Types of Problems	Frequency of Inspection
Transfer Pumps and	Pumps Seals	•	Leaks	Each operating day
Hoses	Motors	•	Overheating	Each operating day
	Fittings	•	Leaks	Each operating day
	Valves	•	Leaks, sticking	Each operating day
	Hose Connections and Fittings	•	Cracks, loose, leaks	Each operating day
	Hose Body	•	Crushed, cracked, thin spots, leaks	Each operating day
Return/Fill Station	Wet Dumpster	•	Excess sediment build-up, leaks, rust, split seams, distortion, deterioration, excess debris	Each operating day
	Secondary Containment	•	Excess sediment/liquid, leaks, deterioration, distortion, excess debris	Each operating day
	Loading/Unloading Area	•	Cracks, pondings/wet spots	Each operating day
Container Storage Area	Total Volume in Storage	•	Exceeds permitted limit	Each operating day
	Condition of Drums	•	Missing or loose lids; labels missing, incomplete or incorrect; rust, leaks, distortion	Each operating day
	Stacking/Placement/ Aisle Space	•	Containers not on pallets, unstable stacks, inadequate aisle space	Each operating day
	Inbound/Outbound Exceed 72-hour period	•	Check that all inbound/outbound containers have been off-loaded or shipped within 72 hours of arrival or loaded for shipment.	Each operating day
Secondary Containment	Curbing, Floor and Sump	٠	Ponding/wet spots, deterioration, displacement, leaks, other	Each operating day
	Loading/Unloading Area	•	Cracks, deterioration, pondings/wet spots	Each operating day

TABLE 5.6-1
EMERGENCY RESPONSE EQUIPMENT

Description	Type/Capacity	Location	Quantity
Fire Extinguisher	ABC	Warehouses	8
Fire Extinguisher	ABC	Office Area	1
Fire Extinguisher	ABC	Tank Farm	1
Eyewash/Safety Shower	Fountain/Overhead	Warehouses	5
Shower		Locker Room	1
First-Aid		Locker Rooms	2
Telephones	Standard	Front Office	Min. 5
Telephones	Standard	South Building Office	Min. 2
Telephones	Standard	North Building	Min. 1
Gloves	Rubber	Emergency Equip. Area	Min. 3 pair
Boots (optional)	Rubber	Emergency Equip. Area	Min. 3 pair
Protective Clothing	Apron	Emergency Equip. Area	Min. 3
Eye Protection	Goggles/Safety Glasses	Emergency Equip. Area	Min. 3
Sorbent Material	Oil Absorbing	Emergency Equip. Area	Min. 1 bale
Shovel	Standard	Emergency Equip. Area	Min. 1
Mop and Bucket	Standard	Emergency Equip. Area	Min. 1
Respirator	Air Purifying	Emergency Equip. Area	Min. 2
Pump	Hand-held, Electric	Emergency Equip. Area	Min. 1
Wet/Dry Vacuum	Portable, Electric	Emergency Equip. Area	Min. 1

PERSONNEL TRAINING

This section of the permit application describes Safety-Kleen's training program. All position descriptions referenced may not be present at this facility. Training plan outlines, job descriptions, training content, frequency and techniques are described as well as the implementation of the training program. The information presented in this section is a representative example of employee training at Safety-Kleen. Variations in individual training may occur.

The purpose of Safety-Kleen's training program is to familiarize employees with environmental regulations, records, and emergency procedures so they will perform their activities in the safest and most efficient manner possible.

DESCRIPTION OF TRAINING PROGRAM

Each employee is trained to operate and maintain the service center safely, and to understand hazards unique to job assignments. New managers must complete a formal introductory training program before starting their jobs, with annual review and update thereafter. New Sales and Service Representatives and all other hazardous waste employees must undergo a combination of classroom and on-the-job training prior to working with hazardous waste. Personnel involved in direct handling of hazardous waste do not work unsupervised until they have completed the entire initial hazardous waste training course.

Outline of Training Program

An outline of the training program given initially to employees who manage or handle Hazardous Waste at the Branch is presented in Table 6.1-1. This training is completed at an off-site company training facility before an employee begins work at the facility they have been assigned to. Table 6.1-15 includes initial and continuing training topics that branch personnel receive.

Job Title/Job Description

Job descriptions for employees who would be expected to manage or handle hazardous Wastes are provided in Tables 6.1-2 through 6.1-14.

Training Content, Frequency, and Techniques

Employee training is accomplished using classroom, online, videotape, written, and on-the-job methods. All new employees whose responsibilities require 24-Hour Hazardous Waste Operations and Emergency Response (Hazwoper) training will receive at least five days of instruction at the Safety-Kleen Training Center. This training program provides a consistent and quality hazardous waste operations training program.

The training that a new operations employee will receive is divided into two parts.

- Two weeks of employment will be spent at the Safety-Kleen Training Center. The new employee will receive a company orientation, including a review of company benefits, and hazardous waste operations training.
- The second part of new employee training is site specific training. When the new
 employee returns to the Branch, qualified individuals delegated by Branch
 management will complete facility specific training. This will include such
 things as permit requirements, emergency contingency plan training, location of
 emergency equipment, etc.

The job tasks a person performs will dictate the type of instruction required. Courses taught at the Safety-Kleen Training Center will include a company and benefit orientation, 24-hour Hazwoper training, Hazardous Materials Transportation Skills (HMTS) training, and Driver Safety training, as well as job specific training.

The following presents the specific training requirements for new Safety-Kleen employees who will manage or handle hazardous waste.

TABLE 6.1-15

CONTINUING TRAINING TOPICS FOR BRANCH EMPLOYEES

- Hazard Communication Safety Training
- Hazard Communication regarding MSDSs
- Preventing Injury and Illness
- Hazardous Materials Regulations
- Waste Analysis Plan
- Preparedness, Prevention, and Contingency Plan
- Respirator Fit Testing, and Training
- Generator Requirements
- Hazardous Waste Paperwork Manifests, BOL, Labeling, etc.
- Initial RCRA training & annual RCRA refresher training hazardous waste permit conditions, container and storage tank regulations, used oil training, universal waste training, manifest requirements, recordkeeping, and hazardous waste determination are included in the initial and annual RCRA training.

A. General

5. WASTE CHARACTERISTICS

Waste analysis requirements mandate that before an owner or operator transfers, treats, stores, or disposes of any hazardous waste, detailed chemical analysis of a representative sample of waste must be obtained. This analysis, at a minimum, must contain all of the information that must be known to transfer, treat, store, or dispose of the waste. The analysis may include data developed under 40 CFR 261 of the regulations and existing published or documented data on the hazardous waste or on hazardous waste generated from similar processes. The Waste Analysis Plan for Safety-Kleen's Tampa, FL Service Center has been developed to meet the requirements described above and as found in 40 CFR 270.14(b) and 264.13.

Permitted/Site Generated Waste Streams

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent	S01* S02**	813	D001 and D-Codes Llisted in Note Below
Branch Generated Liquids/Solids (Debris)	S01*	17	D001 and D-Codes Listed In Note Below; F002, F003, F005
Dumpster Sediment	S01*	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01*	Included Above	D001 and D-Codes Listed in Note Below
Used Immersion Cleaner (#699)	S01*	28	D-Codes Listed in Note Below
Dry Cleaning Waste (Perchloroethylene)	S01*	315	F002 and D-Codes Listed iin Note Below
Dry Cleaning Waste (Naptha-Based)	S01*	Included above	D001 and D-Codes Listed in Note Below
Paint Wastes	S01*	69	D001, F003, F005 and D- Codes Listed in Note Below
Retain Samples From Used Oil Operations	S01*	3	D008, D018, D039, D040
Spent Aerosol Cans	S01*	> 1	D001, D035
Fluid Recovery Service (FRS)	S01***	250	Transfer wastes – waste codes assigned by generator
Mercury-Containing Lamps/devices	N/A	N/A ***	N/A – handled as non- hazardous transfer wastes

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

- * This waste will be stored in containers in the north or south building container storage area. The maximum capacity in the north area is 5,200 gallons. The maximum capacity in the south flammable area is 12,749 gallons, in the south non-flammable area is 41,220 gallons.
- ** The spent parts washer solvent storage tank has a capacity of 15,000 gallons and may be filled up to 14,250 gallons.
- *** This waste will be held for transfer in containers in the transfer area(s)

CHEMICAL AND PHYSICAL ANALYSIS

270.14(b)(2) 264.13(a)

Used materials generated by Safety-Kleen customers are the primary feedstock for the generation of Safety-Kleen recycled solvent products. As a result, quality control of the used materials is necessary to monitor product quality and regulatory consistency. The Tampa facility collects used materials from numerous customers, many of whom are Conditionally Exempt and Small Quantity Generators (CESQGs and SQGs).

Most of the materials collected at the Service Center are managed in a closed-loop system and are collected from companies with a single process (i.e. washing oily parts, dry cleaning, or painting). The composition and quality of these materials are known, and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications.

Descriptions of Permitted Waste Streams Wastes Resulting from Solvent-Based Parts Washer Service

Used mineral spirits solvent from parts washer services at Safety-Kleen customers is accumulated in a 15,000 gallon aboveground storage tank via the Return and Fill station (R/F). Containers of used solvent are poured into a drum washer unit at the R/F which in turn empties into the tank. The appropriate waste codes will be based on Safety-Kleen's Annual Recharacterization (AR) study. This waste handling method results in three types of parts washer solvent-based waste:

- 1. Spent Parts Washer Solvent which may include any of Safety-Kleen's mineral spirits products, is removed from the tank by a tanker approximately every 20 working days. For appropriate waste codes, see the Table above on page 1. The Tampa facility will ship used solvent to a permitted Safety-Kleen/Clean Harbors TSDF or other facility appropriately permitted to accept the waste for reclamation. The used mineral spirits solvent removed from the bulk tank is a homogeneous material as no other waste streams are placed in the bulk tank.
- 2. <u>Solvent Tank Bottoms</u> includes sediment and other heavy material that has accumulated at bottom of the tank. Periodically it is necessary to remove this material when the accumulation impacts, or may impact the ability to pump liquid solvent from the bottom outlet of the tank. The frequency of removal of the tank bottoms varies, dependent on the amount of suspended solids in the used solvent that settle during tank storage. Bottoms are typically removed by suction/vacuum truck and transported for offsite disposal. Typically, removal may be required every three-five years. For appropriate waste codes, see the Table above on page 1.

3. <u>Branch Generated Liquids/Solids (Debris)/Dumpster Sediment</u> – In the course of day-to day operations, the Branch generates waste associated with sampling customers' waste and branch activities. Such wastes may include wipes, gloves, etc. In addition, liquid wastes may be generated as a result of decontaminating sampling equipment. The dumpster sediment chemical composition is analogous to that of the solvent tank bottoms. These containers are stored in the south building flammable storage area. The facility ultimately ships these materials to a permitted Safety-Kleen/Clean Harbors TSDF or other properly permitted facility for disposal. For appropriate waste codes, see the Table above on page 1.

Immersion Cleaner (IC) is another type of parts washer solvent. This product is a heavy aromatic naptha, N-methyl-2-pyrrolidinone, dipropylene glycol methyl ether, monoethanolamine and oleic acid, and may contain a maximum of 1 percent chlorinated compounds. Containers of used IC are stored in the south building non-flammable storage area. The Immersion Cleaner remains in the container in which it was originally used until it is received at a permitted SK/Clean Harbors TSDF for disposal. For appropriate waste codes, see the Table above on page 1.

Wastes Resulting from the Dry Cleaner Service

Safety-Kleen manages naptha-based, and perchloroethylene-type of hazardous dry cleaner waste in the permitted areas. This waste can have three forms: bottoms, filters, and separator waters. These wastes are packaged on the customers' premises in containers meeting U.S. DOT specifications. When received at the facility, the perchloroethylene dry cleaning containers are placed in south building non-flammable container storage area. Naptha-based dry cleaning containers carrying D001, and other applicable codes, will be placed in the south building flammable storage area. Dry cleaning wastes remain in the containers received from the customer until received at the designated, permitted Safety-Kleen/Clean Harbors TSDF, or other appropriately permitted facility.

The dry cleaning process may produce three waste streams.

1. <u>Filter Cartridges</u> are generated as waste when they can no longer effectively filter the solvent in the chamber. In addition to the filter materials of construction consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease, lint, hair, and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight. Dry cleaner filters are given the same waste codes as the associated dry cleaner bottoms because both streams are derived from the same source. Designating the same codes for the filters as were used for the bottoms is a conservative approach. A representative filter sample is difficult to obtain because of the make-up of the filter (metal core) and obtaining the sample would involve dismantling of the filter and undue exposure to the dismantler.

2. & 3. Still Bottom Residue and Separator Water are generated after filtration and distillation at the generator to remove the dissolved materials from the used solvent. The dissolved materials (still bottom residues) are in liquid form and consist primarily of solvent, oil, grease, hair, dirt, and water. In some cases, the dry cleaner will separate the water condensate from the still residue. Water condensate, generated during the distillation process, may contain dry cleaning solvent, oil, grease, and dirt as well. The dry cleaning separator water will be given the same waste codes as the associated bottoms with the omission of D007 because chromium is not expected to carry over into the separator water during the distillation process (i.e., the boiling point of chromium is much greater than the operating temperature of the distillation unit).

For appropriate waste codes, see the Table above on page 1.

Wastes Resulting from Paint and Thinner Service

Paint wastes consist Safety-Kleen lacquer thinner and paint residues resulting from cleaning of the paint guns by the generator. There are primarily three waste streams from this service: Paint Gun Cleaner, Clear Choice® Paint Gun Cleaner, and paint waste-other. Safety-Kleen thinners are used during the generation of the first two waste streams.

- 1. Paint Gun Cleaner is a paint gun cleaning lacquer thinner containing a blend of solvents such as acetone, alcohols, ketones, toluene, xylene, and acetate compounds. These have primary waste codes of D001, F003 and F005. These are contaminated with lower levels of waste paint, as the gun cleaning machine is removing it from the paint sprayer during the cleaning operation. Safety-Kleen's core paint waste is typically recycled and fuel blended. Reference the table on page 1 for other applicable waste codes.
- 2. <u>Clear Choice Paint Gun Cleaner</u> is acetone, so the F005 waste code does not apply to this waste stream. Other applicable waste codes are D001 and F003. The two Paint Gun Cleaner streams share the same AR data because the waste streams are similar due to the identical process generating the wastes. Reference the table on page 1 for other applicable waste codes.
- 3. Paint Waste Other consists of the same material as the Paint Gun Cleaner, but has a higher level of paint solids, as this comes from the dumping of left over paint from paint cups and guns when all the paint in a paint gun is not used. During the process creating this waste, typically smaller volumes of thinner are in the waste so these drums are fuel blended or incinerated rather than recycled for their solvent value. The primary waste codes are D001, F003 and F005. Reference the table on page 1 for other applicable waste codes.

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The paint wastes described above are collected in containers meeting U.S. DOT specifications. The wastes are containerized by the generator at their place of business. The waste remains in the container until it is received permitted Safety-Kleen/Clean Harbors TSDF, or other properly permitted facility for disposal.

Site Generated Retain Samples from Used Oil Operations

<u>Used Oil/Oily Water Retain Samples</u> are taken and maintained for every used oil/oily water service SK performs. This is to ensure that we can identify any customers who introduce contaminants (halogenated solvents or PCBs) into our used oil/oily water loads. At the time the retain sample is taken at the customer location, the driver is able to check the material for appearance (used oil mixed with fuels may cause the material to have a thinner/lighter appearance), unusual odors, and viscosity (used oil mixed with fuels would have a noticeably lower viscosity and flow more easily into the sample jar). These retain samples are kept for a minimum of 90 days and then disposed of as hazardous waste. The samples are typically 4-oz. plastic/glass jars. They are manually placed into 55-gallon drums, and properly labeled for disposal. These containers are stored in the south building flammable storage area until being sent to a permitted Safety-Kleen/Clean Harbors TSDF, or other properly permitted facility for disposal. Waste codes for this material are found in the table on page 1.

Site Generated Spent Aerosol Cans

Spent Aerosol Cans: From time to time the facility generates spent aerosol cans during operations. These cans are accumulated in a satellite accumulation container (30, or 55 gallon) at the facility in SWMU-19. Once this container is full it is moved to the south building flammable storage area until being sent to a permitted Safety-Kleen/Clean Harbors TSDF, or other properly permitted facility for disposal. Waste codes for this material are found in the table on page 1.

Used Antifreeze

The spent antifreeze (ethylene glycol) is collected from automobile service stations. All antifreeze collected and managed by Safety-Kleen within Florida is recycled. At the customer's location, Safety-Kleen pumps waste ethylene glycol (antifreeze) into a Safety-Kleen used oil tanker truck. This truck transports the used antifreeze (glycol) to the Tampa Transflo Bidsite, or branch, for off-loading into a railcar, or tank for storage. The material is then transferred via rail to the Safety-Kleen East Chicago, IN re-refinery, where the ethylene glycol is extracted from the oil by distillation. After separation, the ethylene glycol is shipped to a glycol refinery for additional purification into a pure product and sold on the open market. This procedure is in accordance with FDEP's the Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities, dated May 22, 2012. In addition, Safety-Kleen sells its' own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is shipped to SK distribution centers, and then shipped to 3rd party recyclers

Mercury-Containing Lamps and Devices & Batteries

Mercury-containing lamps and devices are another type of waste handled by the Branch. All mercury-containing lamps/devices are managed in accordance with the Standards for Universal Waste Management found in 40 CFR Part 273. As part of its protocol for handling mercury-containing lamps and devices, the Branch provides customers with four-foot and eight-foot boxes which hold up to 39 lamps. The boxes are picked up at customer locations and are stored at the Branch in a designated area within the waste storage area (Figure 8.1-1). These containers are labeled in accordance with 62-737.400 (5)(b), Florida Administrative Code (FAC). The boxes are periodically shipped to a permitted mercury recovery or reclamation facility.

Safety-Kleen handles all types of batteries with the exception of lithium batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting those standards may be managed as 10-day transfer waste.

270.15(b)(1) Waste Compatibility With Containers 264.172

It is Safety-Kleen's standard operating procedure to use containers made of, or lined with, materials that 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.

Safety-Kleen manages a limited number of waste streams, most are liquid, and most originate from new products that are supplied to its customers in the original DOT approved drums. Safety-Kleen has evaluated the chemical composition of these products and wastes and has determined that the wastes are compatible with the containers in which they are stored.

Note: None of the permitted waste streams carry the D002 waste code for corrosivity. In most cases where a container is not available from a Safety-Kleen-supplied product, Safety-Kleen supplies the customer with a DOT approved drum for that waste type (e.g. when Safety-Kleen collects Dry Cleaning filters).

The only waste stored in the aboveground storage tank is used parts washer solvent. This material has been analyzed and found to be compatible with the steel tank in which it is stored.

Waste in Piles Wastes on Drip Pads

Safety-Kleen's Tampa facility does not have any of these processes on site. Therefore these sections do not apply.

270.14(b)(3) 264.13(b)-(c)

Waste Analysis Plan

Waste analysis at the Safety-Kleen Tampa Service Center is a three-step process that includes:

- Prescreening of customers
- · Qualitative/visual analysis and
- Quantitative analysis (lab analysis)

Prescreening of Customers

Safety-Kleen performs a customer prescreening for all parts washer and immersion cleaner service customers. The other permitted waste streams (dry cleaning wastes and paint wastes) are generated from facilities where there is typically one process generating hazardous waste and the possibility of cross-contamination from other chemicals or wastes is minimal. These wastes remain in the container they were originally packaged until received at a permitted Safety-Kleen/Clean Harbors TSDF, or other properly permitted disposal facility. These waste containers remain closed from customer to final disposition.

Prior to leasing a SK parts cleaning machine, or placing a Customer Owned Machine (COM) service, the customer's business is reviewed. Where the possibility exists for contamination of the parts cleaner solvent (e.g. pesticide, herbicide, or pharmaceutical operations), operations are reviewed to ensure that the solvent is protected from the sources of contamination. In reviewing a customer's business, the Safety-Kleen Representative provides customers with written and verbal information on use of the equipment. This information will contain at a minimum:

- Proper usage and management of the unit
- Information on the reasons to not add materials to the unit, and
- Examples of what not to add to the unit

Qualitative/Visual Analysis

Safety-Kleen conducts qualitative/visual analysis as a part of all parts washer and immersion cleaner services. Qualitative/visual analysis is not conducted on the dry cleaning and paint waste streams as these containers are not opened by the Safety-Kleen service representative and the likelihood of contamination is remote. Safety-Kleen representatives are instructed to visually examine the used solvent (parts washer and immersion cleaner) for each waste pickup when the machines are serviced, noting the quantity, odor, and appearance of the material recovered as follows:

- 1. The quantity of used solvent in the drum When the amount of parts cleaner solvent or immersion cleaner fluid is more than 10% greater than originally supplied, the container will not be accepted. Contingent on the customer's responses to Safety-Kleen's inquiry regarding the customer's operation and handling practices, the solvent is accepted or left with the customer until an analysis is completed to determine its acceptability.
- 2. The odor of the liquid in the container Personnel must never make an effort to "sniff"

the solvent. However, if in the normal course of servicing the customer, the odor of the fluid in the container is noticed to be different from that of parts cleaner solvent or immersion cleaner, the container will not be accepted. Contingent on the customer's responses to Safety-Kleen's inquiry of the customer's operation and handling practices, the solvent is accepted or left with the customer until an analysis is completed to determine its acceptability.

3. The appearance of the liquid in the drum – The used parts cleaner solvents have a normally brown or black appearance. Certain contaminants containing dyes and color pigments (such as transmission fluid, soy-based printers' ink, and water-based paints) may change the color of the used parts cleaner solvent to other colors. Used immersion cleaner should have a dark brown to almost black appearance. Unused immersion cleaner is amber in color. As the solvent is used, the darker it becomes. Therefore, if the spent immersion cleaner does not appear to be amber, brown, or black, the service representative will not accept the container. Safety-Kleen will inquire with the customer regarding operation and handling practices of the material. Based on the response from the customer, Safety-Kleen will either accept the container, or reject until analysis has been completed.

If the material passes the three qualitative/visual analyses shown above the material is noted as having passed the qualitative analysis in our service document (typically a handheld computer printout).

As indicated in each of the qualitative/visual analysis, if the answer to the inquiry to why the test (quantity, odor and appearance) were not acceptable, the material is left behind for further testing. An Account Sales Manager will return to the site to sample the material should the generator request Safety-Kleen to assist in managing the material. The sample will be sent to a third party certified laboratory for testing. A Waste Material Profile Sheet will be completed and once approved the waste will be managed as containerized transfer waste for disposal. At the Service Center, the Safety-Kleen Representative or Material Handler again observes the quantity, odor, and appearance prior to emptying the parts washer solvent into the drum washer unit. If a container with questionable contents is returned to the facility, a sample will be taken and analysis performed. The container will be held at the facility pending completion of analysis. If analysis indicates the waste to be different than what was manifested to the facility, it will be returned to the generator, or managed at the facility in accordance with the generators direction. Records of all sampled and/or rejected wastes will be kept on file at the Tampa branch.

In addition, receipt analysis is performed by the Safety-Kleen Recycle Centers on all inbound bulk solvent waste deliveries. Receipt analysis typically includes a screen for atypical flash point, Polychlorinated Biphenyls (PCBs), and halogenated organics.

Quantitative Analysis (Lab Analysis)

After 50 years of servicing over 250,000 parts washer customers each year, Safety-Kleen has determined that the wastes generated by its customers are relatively homogeneous. The homogeneity of these wastes is evaluated annually through the Safety-Kleen AR process (Quantitative Analysis).

Analytical data from the Annual Re-characterization sampling is subjected to an EPA SW846 approved statistical model (Exhibit C-1). The waste samples analyzed come from a variety of Safety-Kleen facilities across the country and is representative of the Tampa facility.

Samples included in the AR process are selected from random customers serviced by Safety-Kleen facilities. Randomness is overseen by the Safety-Kleen Technical Center, which manages the AR program, selecting the month that the samples will be taken. Generator services are typically scheduled months in advance and those clients whose waste happens to be on hand on the month selected by the Technical Center will be the wastes that will be sampled. The Safety-Kleen Tampa facility conducts AR sampling every other year (see Exhibit C-2 for sampling locations from 2003-2013).

The waste streams collected by Safety-Kleen are uniform across business types and geographical locations. This is demonstrated by the minimal changes in the codes assigned to each stream through the AR statistical evaluation each year via the Non-parametric Upper Confidence Interval Approach.

When subjecting AR sample data to the Non-parametric Upper Confidence Interval Approach, the last 3 years of analytical data for a given waste stream is used from samples pulled from across the country (in most cases). For example, statistically based waste codes assigned to a particular core waste stream in 2016 are based on samples analyzed in 2013, 2014, and 2015. Ideally 50 data points are used but at least 30 data points are required. If 30 data points are not available from samples pulled in 2013/2014/2015, samples from 2012 will also be incorporated into the population.

In reviewing with Dr. Gibbons how the number of data points was derived he wrote in a recent email ... "This is a nonparametric upper confidence limit (see Gibbons, Bhaumik and Aryal, 2010 section 18.7) which is defined by an order statistic (i.e. a rank) of the data. There is nothing magical about 30 or 50, but 50 is good because the median is the average of the 25th and 26th highest values and the UCL is the 31st largest value, which provides a reasonably tight confidence limit (i.e. not an extreme value)."

Homogeneity of the streams was further confirmed in 2004 when Safety-Kleen conducted an Annual Recharacterization using California-only customer data. Safety-Kleen conducted a statistical comparison of the 'California only' Annual Re-characterization result with the results from the National AR (Exhibit C-3). Note the conclusion that California customer wastes are no different than the streams generated by Safety-Kleen customers in the rest of the country.

The waste streams included in the Safety-Kleen AR process are by their nature consistent and predictable. The process includes streams generated by Safety-Kleen customers and terminated as permitted streams at Safety-Kleen facilities as well as streams generated by Safety-Kleen facilities.

Waste streams included in the Re-characterization process for 2015 (for 2016 waste codes) were:

CUSTOMER GENERATED
Immersion Cleaner
Parts Washer Solvent Premium
Paint Gun Cleaner/Paint Wastes/Clear Choice
Dry Cleaner (Perc/naptha-based)

SAFETY-KLEEN GENERATED Bulk Solvent Dumpster Sludge Tank Bottoms

AR Sample Testing Protocol is located in Exhibit C-4. Procedures used for obtaining the samples is included in Exhibit C-5. Final AR (National) Waste Code Assignments are included in Appendix B. A copy of Safety-Kleen's 2015-2016 Annual Re-characterization Data is included in Appendix B. All AR Samples are analyzed by a single lab, currently Test America (Pittsburgh, PA), an independent NELAP accredited environmental laboratory:

Test America-Pittsburgh 301 Alpha Drive Pittsburgh, PA 15238

Waste Determination for Subpart BB and CC Compliance

For purposes of waste determination, this facility utilizes knowledge of the wastes described in this section. The used solvent managed in the tank system is presumed to contain hazardous waste with an organic concentration of at least 10-percent by weight, so Subpart BB regulations apply. For those hazardous wastes that are managed on a transfer basis, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that most waste solvents managed in tanks and containers at this facility may display an average volatile organic concentration of greater than 500 ppm at the point of waste origination. Therefore, no exemption allowed in 40 CFR 264.13b(8) from Subpart CC regulations is requested and hazardous wastes managed in tanks and containers at this facility shall be managed in accordance with applicable Subpart CC standards.

270.14(b)(3), 264.13(b)(1)

Parameters and Rationale

Safety-Kleen's permitted waste streams which are all received in containers are broken into four types:

- Used Parts Washer
- Solvent Immersion Cleaner
- Paint Waste
- Dry Cleaner-Perchloroethylene

The product provided, or in the case of dry cleaner solvents that are purchased by the generator, makes up the majority of the waste. As such the analytical testing includes the regulated constituents in these products and the regulated metals and volatile solvents that may come in contact with the products. This, combined with a known process that the waste streams are being derived from, form the basis for testing.

The purpose of the Re-characterization is to determine the waste codes applicable to core waste streams managed and generated by Safety-Kleen facilities. As such, a waste stream may be excluded from Re-characterization once it has consistently been designated as non-hazardous. A stream may also be excluded from Re-characterization when it has been determined that the codes assigned to the stream are stable and marginal changes in trace constituents will not affect the management of the stream. Lastly, a set of analytes may be omitted if they are not expected or are demonstrated to not be present in a waste stream. Pesticides and herbicides have never been included in the Re-characterization process as these constituents are not allowed in wastes picked up by Safety-Kleen. Analysis for semi-volatiles is in the process of being phased out as codes for semi-volatiles have never been assigned.

270.14(b)(3); 264.13(b)(2) Test Methods

Exhibit C-4 details the AR sample testing protocol.

270.14(b)(3);

Sampling Methods

264.13(b)(3)

AR Sampling Method Requirements are found in Exhibit C-5.

270.14(b)(3);

Frequency of Analysis

264.13(b)(4)

As described previously, a Qualitative/Visual analysis of the parts washer wastes managed at the Service Center is conducted for each waste pickup. Safety-Kleen's Re-characterization is conducted annually.

270.14(b)(3); 264.13(b)(5)(c)

Additional Requirements for Wastes Generated Off-Site

Generators are informed of the results of the AR each year. No action is required by the generator if they agree to the waste code(s). However, if a generator chooses to use knowledge of its process to identify which waste codes are attached to the waste, approval by Safety-Kleen's Central Waste Profiling group is required. In most cases, laboratory analytical data will be required to remove codes determined by the AR process. If additional waste codes are identified by the generator, Safety-Kleen will set up a specific profile for that generators waste stream identifying those waste codes provided.

270.14(b)(3); Additional Requirements for Ignitable, Reactive, or Incompatible 264.13(b)(6)(c); 264.17 Wastes

Waste received at the facility is analyzed according to the procedures described in the Waste Analysis Plan. All ignitable wastes terminated at the facility are compatible with each other and the containers in which they are stored. Therefore, additional analyses to evaluate compatibility are not necessary.

The permitted storage warehouses where ignitable waste is stored are designed for this material. The South Building Container Storage Area has a flammable storage area with a fire door that will close in the case of a fire. All electric components in the Return and Fill area are intrinsically safe. Hot work permits are required for any work that may involve excess heat, sparks or open flames in these storage areas and are conducted only when ignitable materials are not present. No Smoking signs are posted in all areas where ignitable waste is stored and smoking is not allowed within the office, warehouse or fenced areas of the facility.

The only permitted waste opened at the facility is the used parts washer solvent waste, which is consolidated in the aboveground waste storage tank. No other waste streams are added to the tank.

270.14(b)(3); 264.13; Waste Analysis Requirements Pertaining to Land Disposal Restrictions Part 268

All of the permitted waste streams received and stored at the Tampa facility are treated or recycled at an approved Safety-Kleen/Clean Harbors TSDF, contract reclaimer, or other properly permitted facility. The drum washer sediment generated at the facility is containerized and shipped offsite for reclamation. The Service Center does not dispose of any hazardous wastes onsite and does not send any permitted wastes to land disposal facilities. Therefore, the Tampa Service Center is not required to certify that hazardous wastes that are restricted from land disposal are below treatment standards. The following sections discuss how Safety-Kleen determines appropriate Land Disposal Restriction (LDR) classification and treatment standards and how LDR notification requirements are met.

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270.14(a); 264.13(a)(1); Waste Analysis
268.1; 268.7; 268.9;
268.32-268.37; 268.41 -
268.43
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Due to the nature of its business, Safety-Kleen receives wastes that are untreated and that are assumed to exceed the LDR treatment standards. For the Safety-Kleen parts washer solvent, immersion cleaner, dry cleaner wastes and paint wastes, the hazardous constituents are known. The rationale for the selection of LDR treatment standards are provided below.

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270.14(a); 264.13(a)(1); Spent Solvent and Dioxin-Containing Waste 268.2(d); 268.2(f); 268.7; 268.30; 268.31
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Safety-Kleen will manage F-solvent wastes. The spent dry cleaning perchloroethylene is F-Solvent non-wastewater waste with the following treatment standard: tetrachloroethylene (6.0 mg/kg). The perchloroethylene treatment standard for wastewaters is 0.056 mg/l. None of the permitted wastes Safety-Kleen handles contain dioxins.

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270.14(a); 264.13(a)(1); California List Wastes 268.7; 268.32; 268.42(a)
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California list wastes are a distinct category of RCRA hazardous wastes that are restricted under the land disposal restrictions (LDRs). These restrictions only apply to liquid wastes, with the exception of Halogenated Organic Compounds (HOCs), which may be liquid or non-liquid. In Safety-Kleen's case, all of our permitted waste streams are liquid, with the possible exception of the Dry Cleaning Filters, which can be dry although they may have low levels of free liquids at times. In either case the California List Waste rules apply as the Perc Filters contain HOCs. The Safety-Kleen permitted waste streams do not contain PCBs over 50 ppm, free cyanides >1000 mg/l, nor do they have a pH of <2, so these categories do not apply.

Safety-Kleen permitted wastes are either recycled, fuel blended or incinerated. If any of the residues are landfilled, the prohibition levels for the California listed metals and HOC's will apply. Should liquid residues be landfilled they will have less than the metal prohibition limits prior to land disposal, and liquids and non-liquids will have less 1000 mg/kg of HOCs.

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270.14(a); 264.13(a)(1); Listed Wastes 268.7; 268.33 - 268.36; 268.41 - 268.43
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Safety-Kleen does not handle non-solvent F-listed, K-listed, or P-listed waste in its permitted areas. Any transfer waste having these codes will have the appropriate LDR paperwork accompany the manifest so the designated facility can treat the material appropriately.

270.14(a); 264.13(a)(1); 268.7; 268.9; Part 268, Appendix I, IX Characteristic Wastes

Wastes with treatment Standards – Safety-Kleen may generate or store D001 wastes, including parts washer solvent. Since this waste contains high levels of organics, Safety-Kleen assumes that all D001 wastes will contain ≥ 10 percent total organic carbon (TOC). The technology-based standards for these non-wastewaters are "RORGS", (recovery of organics) or CMBST (high temperature organic destruction).

Safety-Kleen may also generate or store wastes that may be classified as D006, D007 (example: immersion cleaner, dry cleaner waste). The non-wastewater treatment standards for land disposal of these wastes are 0.11 mg/L TCLP, and 0.60 mg/L TCLP respectively. The wastewaters treatment standards for D006 (cadmium) and D007 (chromium) are 0.69 mg/l, and 2.77 mg/l respectively.

270.14(a); 268.3 Dilution and Aggregation of Wastes

Safety-Kleen's parts washer solvent is the only permitted waste consolidated at the site. All solvent is either recycled or destroyed via combustion; so this section does not apply.

270.14(a); 264.13; Notification, Certification, and Recordkeeping Requirement 264.73; 268.7; 268.9(d)

For all waste streams terminated at this facility, in accordance with the regulations listed above Safety-Kleen will provide to the TSDFs, or authorized treatment/disposal facility, and require from its' regulated customers, notification/certification which provided the treatment standards for the wastes banned from landfills. These will be updated any time the waste should change or the waste is delivered to a new final permitted site. A copy of this notification/certification shall be available (via electronic storage) at the Tampa facility.

270.14(a); 264.13; Notification, Certification, and Recordkeeping Requirement 268.7(a)

The notice is required paperwork for all Safety-Kleen permitted waste types. The notices and certifications provided by regulated customers must be reviewed for correctness and be kept on file (electronically) at the Service Center for at least three years as part of the operating record.

270.14(a); 264.13; Notification and Certification Requirements for Treatment Facilities 268.7(b)

This facility is not a treatment facility. Therefore, this section does not apply.

270.14(a); 264.13; Notification and Certification Requirements for Land Disposal Facilities 268.7(b)

This facility is not a land disposal facility. Therefore, this section does not apply.

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270.14(a); 264.13; Wastes Shipped to Subtitle C Facilities 268.7(a)-(b)(6)
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All of Safety-Kleen Tampa's permitted wastes are shipped to a RCRA Subtitle C permitted facility.

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270.14(a); 264.13; Wastes Shipped to Subtitle D Facilities 268.7(d); 289.9(d)
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None of Safety-Kleen Tampa's permitted wastes are shipped to a Subtitle D facility. Therefore, this section does not apply.

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270.14(a); 264.13; Recyclable Materials 268.7(b)(6)
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Safety-Kleen Tampa's permitted wastes are not shipped as recyclable materials used in a manner constituting disposal subject to the provisions of 40 CFR 266.20(b). Therefore, this section does not apply.

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270.14(a); 264.13; Recordkeeping 264.73; 268.7(a) (5),(a)(6),(a)(7), (d)
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Safety-Kleen Tampa does no recycling onsite. Therefore, this section does not apply.

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270.14(a); 264.73; Requirement Pertaining to the Storage of Restricted Wastes 268.50
270.14(a); 264.73; Restricted Wastes Stored in Containers
268.50(a)(2)(i)
270.14(a); 264.73; Restricted Wastes Stored in Tanks
268.50(a)(2)(ii)
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Safety-Kleen Tampa stores restricted wastes in tanks and containers solely for accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal. Containers are marked with their contents and the accumulation start date. Tanks are marked with their contents and the waste movements are maintained in the operating record. The facility complies with the requirements in 40 CFR 262.34 and part 264 as wastes are stored for no more than one year, typically much less.

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270.14(a); 264.73; Storage of Liquid PCB Wastes 268.50(f)
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Safety-Kleen Tampa does not store liquid PCB waste on site. Therefore, this section does not apply.

270.14(b)(21); Exemption From Prohibition 268.6

Safety-Kleen Tampa does not seek an exemption to this prohibition. Therefore, this section does not apply.

270.14(a; 264.73; Variance From a Treatment Standard 268.7; 268.44

Safety-Kleen Tampa does not seek an exemption to a treatment standard. Therefore, this section does not apply.

Requirements for Surface Impoundments Exempted from Land Disposal 270.14(a; Restrictions 264.13(b)(7); 268.4; 267.14 Exemption for Newly Identified or Listed Wastes 270.14(a); 267.13; 268.14 Treatment of Wastes 270.14(a); 264.13; 268.4(a)(1)(b)Sampling and Testing 270.14(a); 264.13(b)(6); 268.4(a)(2)(i),(iv)Annual Removal of Wastes 270.14(a); 264.13(b)(7)(iii); 268.4(a)(2)(ii)Design Requirements 270.14(a); 264.13; 268.270.14(a); 268.4(a)(3),(4)(b)

Safety-Kleen Tampa does not have a surface impoundment. Therefore, these sections do not apply.

Waste Manifests

Appropriate shipping papers/manifests are used, based on the monthly quantity of hazardous waste generated by the customer. Safety-Kleen services all three categories of generators in Florida – Conditionally Exempt Small Quantity Generators (CESQGs), SQGs, and LQGs. CESQGs' spent solvent is removed via a service document and no manifest or Land Disposal Restrictions (LDR) form is required. Appropriate records are kept at the Branch as to the date of waste pick-up, quantity, and other data on the service document. SQGs' spent solvent is shipped under a tolling agreement in Florida, which means that a manifest is not used. An LDR form is completed for each SQG. LQGs' spent solvent is always manifested (if hazardous) and an LDR form completed.

Spent solvent (from each Safety-Kleen customer, regardless of generator status) is brought back to the Branch and dumped in the return/fill station and pumped to the waste solvent tank. This tank contains the spent solvent of many customers and is hazardous. The contents are regularly sent via tanker truck to the recycle center in Lexington, SC. These loads are always manifested and accompanied by a LDR form. Shipments of parts washer solvent dumpster mud are also manifested accordingly. Required records are kept at the Branch and the recycle center in accordance with regulatory timeframes.

In accordance with 40 CFR 264.71 through 77, Safety-Kleen will ensure that:

- 1. Customers who are required to provide a manifest do so;
- 2. The manifests are prepared and signed properly; and
- 3. Copies are distributed and kept on file, as required.

In addition, discrepancies must be remediated in accordance with 40 CFR 264.72 and un-manifested wastes will be reported as described under 40 CFR 264.76.

Required Notices

If Safety-Kleen arranges to receive hazardous waste from a foreign source, the Regional Administrator must be notified in writing at least four weeks in advance of the date the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required. Safety-Kleen informs its customers in writing (i.e., on each service document) that the facility has the appropriate permit(s) for, and will accept the waste the generator is shipping. Safety-Kleen keeps a copy of this written notice as part of the operating record.

Before transferring ownership or operation of this facility during its operating life, Safety-Kleen will notify the new owner or operator in writing of the requirements of Part 264 and Part 270 of Chapter 40 in the Code of Federal Regulations.

Biennial reports required by Chapter 62-730.180(4) FAC, will be prepared and submitted by Safety-Kleen, and these records will also be available at the facility for review. The biennial report will be submitted to the Regional Administrator and/or FDEP by March 1 during each even year (1990 being the first year) on EPA form 8700-13B. The report will cover facility activities during the previous calendar years and will include:

- The EPA identification number, and address of the facility;
- The calendar years covered by the report;
- The method of treatment, storage, and disposal for each hazardous waste; and
- A certification signed by the owner or operator of the facility or the authorized representative.

Operating Record

An operating record which contains the information required under 40 CFR 264.73 is maintained and all records and logs are available at the facility, in accordance with 40 CFR 264.74. A copy (paper) of the operating record is retained at the facility to comply with 40 CFR 264.73(b).

The following information will be maintained in writing in the operation record for the facility:

- A description and quantity of each hazardous waste received;
- The date and storage method for such hazardous waste;
- The location of each hazardous waste stored within the facility;
- Records and results of waste analyses performed;
- Summary reports and details of all incidents that require implementation of the contingency plan;
- Monitoring, testing, or analytical data, and corrective action where required by Subpart F and other applicable sections of 40 CFR 264;
- All closure cost estimates under 40 CFR 264.142 and all contingent post-closure cost estimates under 40 CFR 264.144;
- Records of quantities and date of placement for each shipment of hazardous waste placed in land disposal units under an extension to the effective date of any land disposal restriction granted; and
- For any restricted waste generated that can be land disposed without further treatment, and is sent to a land disposal facility, a notice and certification will be sent to the treatment, storage, or land disposal facility with the waste. The notice will state that the waste meets the applicable treatment standards set forth in Subpart D of 40 CFR 268 and applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). The notice will include the following information:

- 1. EPA Hazardous Waste Number; and
- 2. The corresponding treatment standards and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).
- Training records, inspection reports, waste minimization certifications, closure plan, and Corrective Action Documents.

Further, the LDR certification will be signed by an authorized representative and will state the following:

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Section 264.74 requires that all records, including plans, must be furnished upon request to duly designated representative of the Regional Administrator, and this requirement will be honored. A copy of all records of waste disposal locations and quantities will be submitted to the Regional Administrator and/or FDEP upon closure of the facility, if applicable.

As a registered transporter and storage facility for mercury-containing lamps and devices destined for recycling, the Branch complies with the record keeping requirements of FAC 62-737.

Land Ban Notification/Certification Forms

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

- 1. Special forms for each regularly handled wastes types (e.g., parts washer solvent, immersion cleaner, and percholoroethylene); or
- 2. A general form that must be completed for unique or nonstandard waste streams.

The notice is required paperwork for the streams handled by Safety-Kleen. When a shipment with the notice is received, the notice is kept in the files of the receiving facility with the manifest or with the preprint if a manifest is not used.

The facility will comply with the RCRA permitting conditions found in 40 CFR Part 270.30(l)(1), 270.30(l)(2), and 270.30(l)(6). The facility will comply with the record keeping requirements found in 40 CFR Part 264.1064 and 264.1089.

Part II. General

A-8

The Federal laws found in 40 CFR Part 270.3 do apply to Safety-Kleen although they do not appear to be applicable at this time.

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21.7	27.5	172	0.0001	0.0001	0.0001	0.000	0.0001	0.001	0.001	0.001	0.001	0.001	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.0165	0.1	0.1	0.0	. c	0.1	0.1	0.1	0.125	0.125	0.25	0.25	0.25
21.7	27.5	172	0.0002	0.0002	0.0002	0.0002	0.0002	0.002	0.002	0.005	0.002	0.002	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.2	0.2	7.0	0.2	0.2	0.2	0.2	0.25	0.25	0.5	0.5	0.5
C6G140261001	C0J130551001	C71220125001	C8H010296001	C9G160214001	180-11330.1	180-12753-1	180-2214-1	C6G130363001	C6G130375001	C7C270257001	C7C270259001	C/CZ/0262002	C6F290234001	C6F290236001	C6G070307001	C6G070310001	C6G130367001	C6G140Z61001	C2C270250001	C7C270254001	C7C290231001	C7C290233001	C7C290234001	C7C290237001	C7C290242001	C/1220125001	C9F060172001	C9H050282001	C0G230575001	C01030626001	180 2704 1	180-33851-1	180-46384-1	C7C270257001	C7C270259001	C8HU10296001	C9H150185002	180-11339-1	180-12753-1	180-2214-1	C7C290231001	180-33851-1	180-46384-1	C6F290230001	C6G070307001
Lead	Lead	Lead	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Mercury	Methyl Ethyl Ketone	Methyl Ethyl Ketone	Methyl Ethyl Ketone	Methyl Ethyl Ketone	Ethyl	Methyl Ethyl Ketone	Ethyl	Methyl Ethyl Ketone	Ethy	Ethyl	Methyl Ethyl Ketone	Methyl Ethyl Ketone
DC Naptha Bottoms DC Naptha Bottoms	DC Naptha Bottoms	DC Naptha Bottoms	DC North Bottoms	Naptila	Naptha	Naptha	Naptha	Naptha	Naptha	DC Naptha Bottoms	DC Naptha Bottoms	DC Naptha Bottoms	Naptha	Naptha	Naptha	Naptha	DC Naptha Bottoms	Naptila	Naptha	Naptha	DC Naptha Bottoms	DC Naptha Bottoms	Naptha	Naptha		DC Naptha Bottoms	Naptha	Naptha	Naptha		DC Nantha Bottoms	Naptha	Naptha	Naptha		DC Nantha Bottoms	Naptha		Naptha	Naptha	DC Naptha Bottoms	Naptha	Naptha	DC Naptha Bottoms	UC Naptna Bottoms

2006 n 2006 n 2006 n 2006 n 2007 n 2009 ler 2009	
Hebron Hebron Hebron Hebron Hebron Hebron Hebron Clackamas Chandler Hebron Clackamas Chandler Hebron	Hebron Chandler Chandler Hebron Hebron Hebron Macon Hebron
74	23
0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	0.05 1 1 20 20 20 20 20 20 20 20 20 20 20 20 20
	2222222
7/6 E E E E E E E E E E E E E E E E E E E	176m 1877
0.25 0.25 0.25 0.25 0.25 0.25 0.25 0.25	0.23 0.5 0.5 10 10 10 10 10 10 10 10 25 25 25 33
0.55 0.55 0.55 0.55 0.05 0.05 0.05 0.05	
C6G070310001 C6G130363001 C6G130367001 C6G130367001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C0030626001 C0130626001 C0130626001 C0130626001 C0130626001 C0130626001 C0130626001 C01220125001 C01220125001 C6F290236001 C7C27025001 C6F290236001 C7C270257001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001 C6F290236001 C7C27025001	C6G130375001 180-33851-1 180-46384-1 C6F290230001 C6G70307001 C6G070310001 C6G140261001 C6G140261001 C7C290233001 180-2704-1 C7C270250001 C7C270250001 C7C270250001 C7C270250001 C7C270250001 C7C270254001 C7C270254001 C7C290237001
Methyl Ethyl Ketone Methylphenol, 3 & 4	
DC Naptha Bottoms	DC Naptha Bottoms

Hebron 2007 Hebron 2006 Hebron 2007 Hebron 2007 Clackamas 2008 Clackamas 2012 Clackamas 2012 Clackamas 2012 Clackamas 2017 Chandler 2008 Sacramento 2008 Chandler 2009 Chandler 2010 Chandler 2010 Chandler 2010 Chandler 2016 Hebron 2006 Hebron 2006 Hebron 2007 Chandler 2014 Clackamas 2009	Vinton 2010 Hebron 2006 Hebron 2007 Hebron 2007 Clackamas 2007
Hebron Hebron Hebron Hebron Clackamas Clackamas Clackamas Chandler Chandler Chandler Chandler Chandler Chandler Chandler Hebron	Kir Het Het Cack
23	
20 0.05 0.05 0.05 0.05 0.05 0.05 0.01 0.11 0.13 0.	
	2222
7/6m 7/6m 7/6m 7/6m 7/6m 7/6m 7/6m 7/6m	mg/L mg/L mg/L mg/L
34 38 0.025 0.025 0.025 0.025 0.025 0.05	0.25 1.5 1.5 1.5 2.4
3.7 3.8 3.0.05 0.05 0.05 0.05 0.05 0.01 0.11 0.13	
C7C290234001 C6G130367001 CGG130363001 C7C270257001 C7C270259001 C8H010296001 C9H150185002 180-1273-1 180-2214-1 C6F290236001 C71220125001 C9H050282001 C9H050282001 C9H050282001 C9H050282001 C9H050282001 C9H050282001 C9H280124001 C6C130375001 C6C130375001 C6C130375001 C6C130375001 C6C130375001 C6C130375001 C6C130375001 C6C130375001 C6C130375001 C6C130375001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130377001 C6C130337001 C7C290233001 C7C290233001 C7C290234001 C7C290234001 C7C290234001 C7C290231001 180-23861-1 180-2214-1 C8H010296001 C9H050282001 C9C6230575001	C01030626001 C6G130336300 C6G13037500 C7C27025700 C7C27025900
Methylphenol, 3 & 4 Methylphenol, 3 & 4 Methylphenol, 3 & 4 Nitrobenzene Nitrobenze	Pentachlorophenol Pentachlorophenol Pentachlorophenol Pentachlorophenol Pentachlorophenol Pentachlorophenol
DC Naptha Bottoms	DC Naptha Bottoms

2011 2010 2006 2006 2006 2006 2006	2006 2006 2007 2007 2007 2006 2007 2007	2001 2001 2001 2000 2001 2000 2000 2000	2005 2006 2006 2006 2007 2009 2000 2000 2000 2000 2000
Chandler Clackamas Hebron Hebron Hebron Hebron	Macon Hebron Hebron Hebron Hebron Hebron Hebron Hebron Hebron Hebron	Clackamas Chandler Hebron Vinton Clackamas Chandler Hebron Chandler Hebron Macon Hebron Macon Hebron Clackamas	Hebron Hebron Hebron Hebron Hebron Clackamas Sacramento Chandler Hebron Santa Ana Clackamas Hebron Hebron Hebron
34			
23			
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		I I	
2 22223		1 1	٦٥
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50 300 300 300 300 300 300	3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3	5.54 5.65 5.60 6.07 6.07 6.07 6.03 6.3	6.4 6.5 6.8 6.8 7 7 7.1 7.1 7.4 7.7 9.1 0.025
100 62 600 600 600 600 600	600 600 600 600 600 600 600 600 600 600	5.54 5.65 5.69 6.07 6.07 6.11 6.3	6.4 6.5 6.8 6.8 7 7 7.1 7.1 7.7 7.7 7.7 9.1 0.05
180-2704-1 COJ130551001 C6F290230001 C6F290234001 C6G070310001 C6G130367001	C6H280124001 C7C270250001 C7C270254001 C7C290233001 C7C290234001 C7C290234001 C7C290234001 C6F290234001 C6F290236001 C6F290236001 C6F30303001 C7C290231001 C7C290231001 C7C290233001 C7C290233001 C7C290233001	180-2214-1 180-33851-1 C7C290237001 C01030626001 C0J130551001 180-46384-1 C7C270254001 C7C270262001 180-12753-1 C6G130383001 C6G130383001 C6H280124001 C7C290234001 C7C290234001 C7C290234001	C7C270250001 C6F290230001 C6G130375001 C6G170310001 C7C290242001 C7I220125001 C9F060172001 C9F060172001 C9G160214001 C8H010296001 C7C270257001 C7C270259001 C6G130335001
			PH P P P P P P P P P P P P P P P P P P
Naptha Naptha Naptha Naptha Naptha Naptha Naptha	Naptha	DC Naptha Bottoms	DC Naptha Bottoms

nn 2007 nn 2007 nn 2007 nn 2007 nn 2006 nn 2007 nn 2006 nn 2007 nn 2006 nn 2007 nn 2007 nn 2006 nn 2006 nn 2006 nn 2007	
Hebron Hebron Hebron Clackamas Clackamas Chandler Clackamas Chandler Chandler Chandler Chandler Chandler Chandler Chandler Chandler Hebron	Hebron Hebron Hebron
0.05 0.05 0.07 0.07 0.07 0.05	0.0 0.5 0.5
בכככככככככככככככככככככככככככככככככככככ	222
	mg/L mg/L mg/L
	0.25 0.25 0.25
2001 0.05 5001 0.05 5001 0.05 5001 0.05 5002 0.01 4-1 0.05 5001 0.05 5001 0.05 5001 0.05 5001 0.05 5001 0.05 60001 0.05	
C7C270257001 C7C27025001 C6F290236001 C6F290236001 C8H010296001 C8H010296001 C9H150185002 180-12753-1 180-2214-1 C71220125001 C9H01030626001 C9H01030626001 C9H01030626001 C9H01030626001 C9H01030626001 C9H01030626001 C9H01030626001 C9C27025001 C6C370267001 C7C270250001 C7C270250001 C7C270250001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C270257001 C7C270257001 C7C270257001 C7C270257001 C7C270257001 C7C270257001 C7C270257001 C7C270257001 C7C270257001 C9C160214001 C9C160214001 C9C160214001 C9C160214001 C9C160214001 C9C160214001 C9C16021001 C6C170250001 C6C170250001 C6C170250001 C7C270250001 C7C270250001 C7C270250001	C7C29023300 C7C290234001 C7C290237001
Pyridine	Selenium Selenium Selenium
	DC Naptna Bottoms DC Naptha Bottoms DC Naptha Bottoms

2007	2009	2009	2010	2014	20.10	2002	2007	2002	2010	2006	2006	2006	2006	2002	2007	2007	2009	2009	2011	2012	2012	2011	2006	2006	2006	2006	2006	2006	2006	2006	2007	2007	2007	2007	2007	2007	2007	2008	2008	2009	2009	2010	2010	2010	2014	2015	2014	2010	2012	
Hebron Chandler	Sacramento	Chandler	Clackamas	Chandler	VINTON	Clackamas	Uobros	Macon	Chandler	Challule	Hebron	Hebron	Hebron	Hebron	Hebron	Hebron	Santa Ana	Clackamas	Chandler	Santa Ana	Chandler	Clackamas	Hebron	Hebron	Hebron	Hebron	Hebron	Hebron	Hebron	Macon	Hebron	Hebron	Hebron	Lebron	Hebron	Hebron	Clackamas	Clackamas	Chandler	Sacramento	Chandler	Chandler	Vinton	Clackamas	Chandler	Chandler	Chandler	Clackamas	Chandler	5
36																																		36	2															
24																																		100	1.7															
0.5	0.5	0.5	0.5	- 4		- C		0.0) 5 5	0.00	0.0	0.Ö5	0.05	0.05	0.05	0.05	0.05	0.05	0.5	0.25	0.25	0.25	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	 	0.0	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.01	0.01	0.0	;
חם	>) :	o -	7	_	ס))	D	\supset	\supset	⊃	D	٦	⊃	⊃	J)	J)	⊃	⊃	⊃	⊃	⊃ :	⊃ :	⊃ :	> =) <u>I</u>) =	· ⊃	⊃	D	⊃	\Box	⊃	⊃)) :	o -	7				
mg/L mg/L	mg/L	mg/L	mg/L	mg/L	7/50	ma/L	1/6m	mg/L	l/bm	1/6m	ma/l	mg/L	ma/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	ma/I	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	No Units	No Units	No Units	2
0.25	0.25	0.25	0.20	0.33	0.0 0.0 0.0 0.0	0.57	0.58	0.64	0.66	0.23	0.95	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.068	0.125	0.125	0.125	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.45	0.74	0.83	90.0 60.0	;
0.5	0.5	0.5 r	C.O.	0.33	0.00 72.00	0.57	0.58	0.64	0.66	0.29	0.95	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.068	0.25	0.25	0.25	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5 8.4		0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.45	0.74	0.83	9.0 0.0	;
C7C290242001 C8H010302001	C9F060172001	C9H050Z8Z001	100130331001	0.01030626001	180-46384-1	C71220125001	C6G070310001	C6H280124001	C0G230575001	C6G130367001	C6F290230001	C6G130363001	C6G130375001	C7C270257001	C7C270259001	C7C270262002	C9G160214001	C9H150185002	180-2704-1	180-11339-1	180-12753-1	180-2214-1	C6F290230001	C6F290234001	C6F290236001	C6G070307001	C6G070310001	C6G130367001	C6G140261001	C6H280124001	C7C270250001	C7C270254001	C7C290231001	C7C290234001	C7C290237001	C7C290242001	C71220125001	C8H010296001	C8H010302001	C9F060172001	C9H050282001	C0G230575001	C01030626001	C0J130551001	180-33851-1	180-46384-1	180-33851-1	C0J130551001	180-11339-1	
Selenium Selenium	Selenium	Selenium	Solonium	Selenium	Selenium	Selenium	Selenium	Selenium	Selenium	Selenium	Selenium	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Silver	Specific Gravity	Specific Gravity	Specific Gravity	5::-5:
Naptha Naptha		DC Naptha Bottoms		Naptha	Nantha		Naptha	Naptha		Naptha	Naptha		DC Naptha Bottoms	Naptha	DC Naptha Bottoms	DC Naptha Bottoms	DC Naptha Bottoms	DC Naptha Bottoms		DC Naptha Bottoms	DC Naptha Bottoms	DC Naptha Bottoms	DC Naptha Bottoms	Naptha		DC Naptha Bottoms	Naptha	DC Naptha Bottoms		DC Naptha Bottoms	Naptha		DC Naptha Bottoms	DC Naptha Bottoms	Naptha	Naptha	DC Naptha Bottoms		Naptha	DC Naptha Bottoms	, , , , , , , , , , , , , , , , , , , ,									

as 2012 as 2011 as 2012 as 2011 as 2007 as 2007 as 2008 as 2009 as 2007 con 2006 as 2009 as 2009 as 2007 con 2006 as 2009 as 2009 as 2009 an 2009	
Chandler Chandler Clackamas Hebron Santa Ana Chandler Clackamas Chandler Hebron	Hebron
24	
0.01 0.02 0.03 0.02 0.02 0.02 0.03	0.5
222222	D
8 C C C Units S C C C C C C C C C C C C C C C C C C	mg/L
0.93 1.1 0.11 0.12 0.13 0.14 1.4 1.4 1.4 0.13 0.14 0.14 0.14 0.15 0.15 0.15 0.15 0.15	0.25
0.93 1.1 1.1 0.2 0.2 0.2 0.3 0.3 0.3 0.3 0.3 0.3 1.4 1.4 1.4 1.4 1.4 1.4 1.4 1.4	0.5
180-46384-1 180-12753-1 180-12753-1 180-2214-1 C7C2270257001 C7C270259001 C9G160214001 180-1339-1 180-12753-1 180-12753-1 180-12753-1 180-12753-1 180-12753-1 180-1338-1 180-12753-1 180-1338-1 C6G130375001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C7C29023001 C7C29023001 C7C29023001 C7C27025001 C6G130367001 C6G130367001 C7C27025001 C6G17030001 C7C27025001 C6G17030001 C7C27025001 C6G1703001 C6G1703001 C7C27025001 C6G1703001 C7C27025001 C6G1703001 C7C27025001 C6G1703001 C7C27025001 C6G1703001 C7C27025001 C7C27025001 C6G1703001 C7C27025001	C6G130363001
Specific Gravity Specific Gravity Specific Gravity Specific Gravity Specific Gravity Tetrachloroethene Trichloroethene	Trichloroethene
DC Naptha Bottoms DC Naptha Bo	Naptha

2007 2007 2007 2007 2007 2007 2007 2008 2006 2006 2006 2007 2007 2007 2007 2007	
Hebron Hebron Clackamas Sacramento Chandler Hebron	Clackamas Clackamas Chandler Chandler Hebron
35 36	
23	
0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.2 0.2 0.2 0.5 0.5
	00000
7/6m 1/6m 1/6m 1/6m 1/6m 1/6m 1/6m 1/6m 1	mg/L mg/L mg/L mg/L
0.25 0.25 0.25 0.25 0.25 0.25 0.25 1.1 1.1 1.2 1.4 1.5 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0	0.1 0.1 0.1 0.25 0.375
0.55 0.05	0.2 0.2 0.2 0.5 0.5
C7C270254001 C7C27026201 C7C290233001 C7C290233001 C7C290233001 C71220125001 C9F060172001 C9H050282001 C9H050282001 C6G130367001 C6G130367001 C6G130367001 C6G130367001 C6C290234001 C6C290234001 C6C290234001 C6C290234001 C6C290234001 C6C290234001 C6C290234001 C6C290230001 C6C290230001 C7C29023001 C6C303030001 C6C303030001 C6C303030001 C7C270250001 C7C270250001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C27025001 C7C290233001 C7C27025001 C7C290233001 C7C27025001 C7C290233001 C7C290233001 C7C290233001 C7C29023001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C7C290233001 C7C290230576001 C9H150185002	CU1730551001 180-2214-1 180-2704-1 180-46384-1 CGG130335001
Trichloroethene Trichloroethen	Vinyl Chloride Vinyl Chloride Vinyl Chloride Vinyl Chloride Vinyl Chloride Vinyl Chloride
laptha E lap	DC Naptha Bottoms

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VTRIX PARAMETER LAB ID	RESULT UNITS QUALIFIER ŘEPORTING LIMIT FACILITY	ry YEAR
1,1-Dichloroethene Average		
1,4-Dichlorobenzene Average	2.46	
2,4,5-Trichlorophenol	22.30	
Average 2-Methylphenol		
Average	0.08	
Barium Average	0.40	
Cadmium Average	0.02	
Chlorobenzene	6.40	
Average		
Chloroform Average	4.40	
Chromium Average	7.37	
Flash Point Average	139.60	
Hexachloroethane	0.24	
Average		
Lead Average	10.37	
Methyl Ethyl Ketone	10.48	
Average		
Methylphenol, 3 & 4 Average	24.27	
Nitrobenzene Average	78.33	
Pentachlorophenol	43.00	
Average pH Average	9.09	
Pyridine Average	21.00	
Selenium Average	0.46	
Silver Average	0.26	
Specific Gravity Average	0.91	
Tetrachloroethene Average	90581.61	
Trichloroethene Average	92.49	
Grand Average	11350.96	



SAFETY-KLEEN MODEL 11 IMMERSION CLEANER Operator's Booklet



Customer should read and retain this booklet.

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Local Safety-Kleen Branch Office:	
Address:	
Phone Number:	

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The Model 11 Immersion Cleaner	2
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SAFETY MEASURES



Prior to handling this equipment, the operator is advised to carefully read this booklet as well as the cleaning fluid's Safety-Data Sheet (SDS) which is provided by the Safety-Kleen Representative or available at www.safety-kleen.com. This booklet includes vital information about this equipment's safe operation and troubleshooting procedures. The SDS contains critical information about the cleaning fluid's proper usage, health hazards, first aid, shipping, handling and storage, as well as emergency and environmental

information. The operator should keep this booklet and the SDS within easy reach.

The Safety-Kleen cleaning fluid and other additives provided by Safety-Kleen are the ONLY cleaning agents intended for use in this equipment. The use of any other cleaning agents could cause a hazardous condition over which Safety-Kleen has no control and which will void equipment warranty.

Do NOT modify this equipment. Modification will void equipment warranty as well as the required ETL listing, and may cause personal injury and/or property damage.

Complete safety in the workplace is dependent upon the proper handling of this equipment and the cleaning fluid used in it. Therefore, it is important to carefully follow all safety/safe-use instructions and operational procedures provided in this booklet, as well as all instructions included on the SDS and equipment labels. Failure to do so may create a dangerous working environment.



The solvents used in this equipment have been classified a follows: COMBUSTIBLE LIQUID. HARMFUL IF INHALED. HARMFUL IF SWALLOWED. RESPIRATORY TRACT, EYE, AND SKIN IRRITANT. MAY CAUSE CENTRAL NERVOUS SYSTEM DAMAGE.

Important Safety Instructions

- Read and understand the Operator's Booklet and the Safety Data Sheet (SDS) for the cleaning fluid used in this Safety-Kleen equipment before operating. Use only as described in this booklet. Use only manufacturer's supplied attachments.
- 2. Do NOT immerse parts more than 15 minutes without inspection.
- 3. Ensure air supply does NOT exceed the maximum inlet air pressure of 120 psi.
- 4. Do NOT directly agitate cleaning fluid by injecting gases or air.
- 5. In an emergency, turn off the equipment and any air or electrical supply.
- 6. Do NOT operate defective equipment or that with a damaged power cord until it has been examined by a qualified serviceman.
- 7. If an extension cord is necessary, a cord with a current rating equal to or more than that of the equipment should be used. Cords rated for less current than the equipment may overheat. Care should be taken to arrange the cord so that it will not be tripped over or pulled.
- 8. Do NOT modify this equipment. Modification may cause personal injury and/or property damage, and will void equipment warranty. Do NOT operate this equipment in any manner that can cause splashing or mist to form.
- 9. Do NOT operate the equipment if a leak is apparent or occurs during use. Slippery conditions can result. Use caution when attempting to stop the leak (only attempt if possible to do without risk). Consult SDS for clean-up measures. Contact your Safety-Kleen Representative.
- 10. To reduce the risk of fire, do NOT operate equipment in the vicinity of any open containers of flammable liquids (e.g., gasoline) or near any ignition source. Keep away from heat, spark, or flame.

- Model 11 Operator's Booklet

 11. To reduce the risk of electric shock, do NOT use on wet surfaces or expose to rain. Do NOT operate any electrical apparatus inside the equipment.
 - 12. Care must be taken as burns can occur from touching hot parts.
 - 13. Do NOT use below garage floor or grade level.
 - 14. Use ONLY in a well-ventilated area.
 - 15. Do NOT lean into this equipment.
 - 16. Do NOT smoke, eat, or drink in the work area. Use good personal hygiene. Wash hands thoroughly with soap and water after handling. Clean water should be available in the work areas for flushing the eyes and skin.
 - 17. Swipe all dirtied parts clear of foreign chemicals and dirt before placing in the unit.
 - 18. Avoid contact with cleaning fluid or vapor. Always wear appropriate personal protective equipment (gloves, apron, eyewear, respirator [where required]) to meet OSHA protection standards. ALWAYS WEAR SAFETY GLASSES. Everyday eyeglasses only have impact resistant lenses, they are not safety glasses. Consult the SDS and follow all recommended safety information.
 - 19. Use ONLY the cleaning fluid provided. Do NOT spray aerosols into or around this equipment. Do NOT add any other cleaning fluids or chemicals to the cleaning fluid. The use of other chemicals may potentially cause a hazardous condition. Do NOT remove cleaning fluid from the equipment.
 - 20. Do NOT place hot parts in contact with the cleaning fluid.
 - 21. Do NOT clean friction materials (e.g., brake linings and clutch surfaces) in this equipment. Do NOT clean or degrease porous or absorbent materials, such as; cloth, leather, wood, or paper in this equipment.
 - 22. Do NOT use compressed air to dry parts.
 - 23. Do NOT obstruct or hang anything on the lid. Close the lid when the equipment is not in use.
 - 24. Always unplug equipment from the electrical outlet when being maintained, serviced, or repaired.
 - 25. Never use the power cord to pull the plug from the outlet. Grasp plug and pull to disconnect.

Save These Instructions

THE MODEL 11 IMMERSION CLEANER

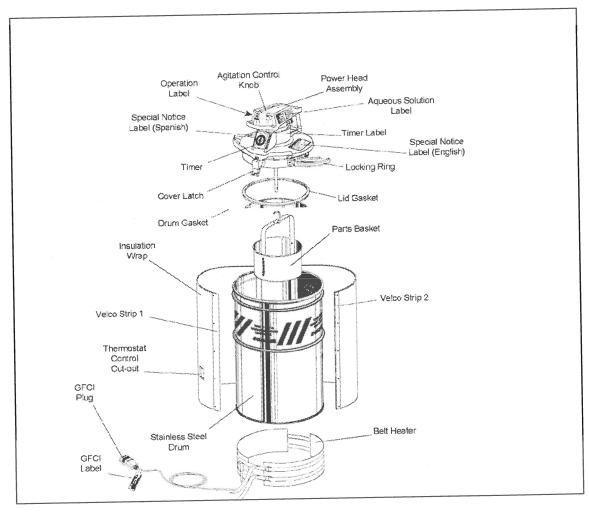
The Safety-Kleen Model 11 Immersion Cleaner is an electrically heated, air powered, agitating parts cleaner developed to clean carbon steel and aluminum parts.

The solvent-based Model 11 consists of an air-powered, agitating head assembly mounted atop a 16 gallon mild steel drum. Attached to the bottom of the power head assembly is a removable stainless steel parts basket that is submerged in the aqueous solution during the cleaning process. This basket agitates propelled by an air-operated motor, loosening dirt and debris in the process.

A bell timer is used to notify the user if the parts have been in the solution for enough time. This prevents softer metals, such as aluminum, from being destroyed, if allowed to remain immersed for too long in the aggressive solution.

SPECIFICATIONS

Floor Space	
Height	39" (99 cm)
Height with lid open	48" (122 cm)
Diameter	14" (53 cm)
Basket Space	
Depth	6" (15 cm)
Diameter	11" (28 cm)
Weight Capacity	
Weight of unit (empty)	28 lbs. (13 kg)
Maximum workload	25 lbs. (11 kg)
Maximum filled weight	90 lbs. (4 1 kg)
Electrical requirements	120 VAC, 60Hz, 10A. 1.6 kW
	Grounded, dedicated outlet
Operating Temperature	190° F (88° C)
Miscellaneous	
Operation type	Automatic
Listing	ETLus
Maximum Solvent Volume	9 gal (34 L)
Air Power	80 psi, 1.5 cfm



OPERATION

To Load Parts

- 1. Lift Power Head Assembly and pivot to rear position.
- 2. Direct arrow on the rotor handle to the right or left and raise handle until it stops. Rotate handle 1/4 turn until arrow on handle points to the rear. Rotor and Parts Basket are now in the drain/load position.
- 3. Release Cover latch. Lift Cover and place parts in Parts Basket.
- 4. Close Cover and latch. Turn rotor handle 1/4 turn left or right and lower Parts Basket into solution.
- 5. Position Power Head Assembly over rotor handle. Turn the Agitation Control knob to the
- 6. ON (or RUN) position.
- 7. Set timer by turning timer knob clockwise for desired time. Colder temperatures may require longer immersion.

To Unload Parts

- 1. Turn Agitation Control knob to the OFF (or PARK) position. Lift and position the Power Head Assembly to the rear.
- 2. Direct arrow on the rotor handle to the right or left and raise handle until it stops. Rotate handle 1/4 turn until arrow on handle points to the rear. Rotor and Parts Basket are now in the drain/load position.
- 3. Release Cover latch, lift Cover and unload parts or remove Parts Basket. Close Cover.

TROUBLESHOOTING

Problem Possible Solution	
Parts Basket Does Not Turn or Turns Too Slowly	 Check that the Immersion cleaner is connected to an air compressor Check that the air compressor is plugged in, turned on, and operating at 80 psi or greater. Turn agitation control knob clockwise to increase air and basket speed. Ensure the Power Head Assembly is in the lowered position and engages with the shaft to which the basket is mounted. Check that there are no parts obstructing or protruding from the basket. Check that the weight of the parts in the basket does not exceed 25 lbs. Contact the Safety-Kleen Representative.
Cleaning Solution is Cold	 Check the power cord connection. Confirm the customer's electrical outlet is functioning properly. Turn the thermostat switch clockwise 1/4 turn. Ensure insulation sleeve is securely wrapped around the drum. Contact the Safety-Kleen Representative.

SERVICE AND REPAIR

In accordance with your service agreement with Safety-Kleen Systems, Inc., a Safety-Kleen service representative will:

- Install and set up the Safety-Kleen equipment
- Be your primary contact with Safety-Kleen
- Put the name and phone number of the nearest Safety-Kleen branch on the equipment and/or on the inside cover of this booklet
- Provide information about your service contract with Safety-Kleen
- Explain what cleaning fluid is provided with the equipment, provide SDS's and answer any questions about the cleaning fluid

This equipment is to be serviced only by authorized Safety-Kleen personnel using an approved cleaning fluid. If you have any questions, require repairs, or need early service, contact your local branch or Safety-Kleen at 1-800-669-5740. Additional assistance can be found at www.safety-kleen.com.



Safety-Kleen Systems, Inc. 2600 North Central Expressway Suite 200 Richardson, TX 75080

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SAFETY-KLEEN MODELS 16(C) & 30(C) SINK ON A DRUM PARTS WASHERS Operator Booklet



Customer should read and retain this booklet.

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LOCAL SAFETY-KLEEN BRANCH					
OFFICE ADDRESS					
PHONE NUMBER					

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SAFETY MEASURES



Safety in the workplace is dependent upon the proper use of this unit and the cleaning fluid used in it. Therefore, it is important to carefully follow all safety instructions and operational procedures provided in this booklet, as well as all instructions included in the cleaning fluid's Safety Data Sheet (SDS) and on the unit labels. Failure to do so may create a dangerous working environment.

Keep a copy of this booklet and the SDS near the unit for quick and easy reference.



In accordance with Occupational Health and Safety Administration (OSHA) requirements, these units have been tested by a Nationally Recognized Testing Laboratory (NRTL), Intertek Services, and are found to be in compliance with the following standards:

- ANSI/UL 201: The Standard for Safety for Garage Equipment
- CAN/CSA C22.2 No. 68: The Standard for Motor Operated Appliances

IMPORTANT SAFETY INSTRUCTIONS

- 1. Serious injury could result from the misuse of this unit.
- 2. Do NOT allow anyone suffering from respiratory problems or allergies to cleaning fluids operate this unit.
- 3. Do NOT operate damaged unit until it has been examined by a qualified technician.
- 4. Do NOT modify this unit. Modification may cause personal injury and/or property damage, and will void unit warranty and NRTL listing.
- 5. Use ONLY the cleaning fluid provided. Do NOT spray aerosols into or around this unit. Do NOT add any other cleaning fluids or chemicals to the cleaning fluid. The addition of other chemicals may cause a hazardous condition. Do NOT remove cleaning fluid from the unit.
- 6. Do NOT operate this unit in any manner that can cause splashing or mist to form.
- 7. Avoid contact with cleaning fluid or vapor. Always wear appropriate personal protective equipment (gloves, apron, eyewear, respirator [where required]) to meet OSHA protection standards. ALWAYS WEAR SAFETY GLASSES. Consult the SDS and follow all recommended safety information.
- 8. Do NOT smoke, eat, or drink in the work area. Use good personal hygiene. Wash hands thoroughly with soap and water after handling. Clean water should be available in work areas for flushing the eyes and skin.
- 9. Do NOT lean into this unit.
- 10. Use ONLY in a well-ventilated area.
- 11. Do NOT use below garage floor or grade level.
- 12. To reduce the risk of fire, do NOT operate unit in the vicinity of any open containers of flammable and/or combustible liquids (e.g., gasoline) or near any ignition source. Keep away from heat, spark, or flame.
- 13. A fire extinguisher (dry chemical type ABC, dry chemical type BC, foam, carbon dioxide or Halon) must be kept nearby when working with flammable and combustible fluids. Do not use water to extinguish a fire.
- 14. Dirty parts coated with excess soil must be "pre-cleaned" and the waste emptied into an appropriate waste container before placing them into the unit for cleaning.
- 15. Do NOT place hot parts in contact with the cleaning fluid.
- 16. Do NOT clean friction materials (e.g., brake linings and clutch surfaces) in this unit. Do NOT clean or degrease porous or absorbent materials, such as; cloth, leather, wood, or paper in this unit.

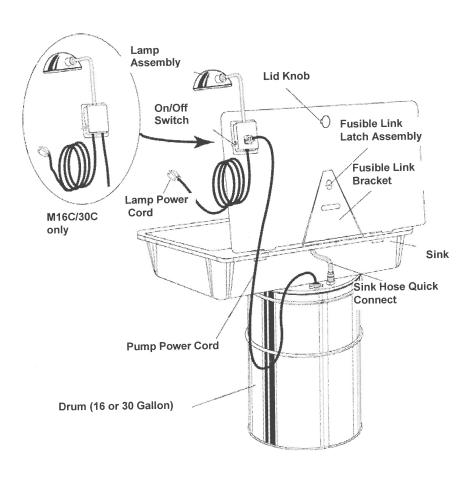
- 17. Do NOT operate any electrical apparatus inside the unit.
- 18. Do NOT operate the unit if a leak is apparent or occurs during use. Slippery conditions can result.

 Use caution when attempting to stop the leak (only attempt if possible to do without risk). Consult the SDS for clean-up measures. Contact your Safety-Kleen Representative.
- 19. Clean up spills immediately. Flammable/combustible vapors can spread further than the spill itself. They may also collect in pits or other low areas, creating a fire hazard.

SAVE THESE INSTRUCTIONS

SAFETY-KLEEN MODEL 16 & MODEL 30

Safety-Kleen's Model 16 (C) and Model 30 (C) Sink-on-a-Drum Parts Washers are classified as remote reservoir cold cleaners according to Federal/State/Provincial solvent degreasing regulations. The Model 30's sink is the larger of the two sinks and sits atop a 30 gallon steel drum containing Safety-Kleen Cleaning fluid. The Model 16 sits atop a 16 gallon steel drum of cleaning fluid. In addition to the sink and drum, other shared components include the fusible link, pump, hose/brush and lamp assemblies. The Model 16C and 30C are designed for Canadian use.



SPECIFICATIONS

	Model 16(C)	Model 30(C)
Floor Space		
Width	27.50" (69.9 cm)	33.25" (84.5 cm)
Depth	16.25" (41.3 cm)	22.25" (56.6 cm)
Height with lid open	53.00" (134.7 cm)	60.00" (152.4 cm)
Sink Dimensions		
Width	27.50" (69.9 cm)	33.25" (84.5 cm)
Depth	16.25" (41.3 cm)	22.25" (56.6 cm)
Height	7.50" (19.1 cm)	8.00" (20.4 cm)
Load capacity of sink	25 lbs (11.4 kg)	25 lbs (11.4 kg)
Weight		
Weight of unit w/ empty drum	57 lbs. (25.9 kg)	62 lbs. (28.2 kg)
Weight of unit w/ full drum	111 lbs. (50.3 kg)	174 lbs. (73.5 kg)
VVCIGITE OF CITIE OF THE CO.	Grounded, dedicated outlet	Grounded, dedicated outlet
Electrical	115V, 60hz,1.4A, 6' power cord	115V, 60hz,1.4A, 6' power cord
Maximum bulb wattage	40 W	40 W
Operating Temperature	Ambient	Ambient
Fusible Link Melt Temp	158°F	158°F
Flowrate		
Spigot/Brush	1.3 gpm/1.0 gpm	1.3 gpm/1.0 gpm

PRE-INSTALLATION

- Confirm the M16 or M30 will be located
 - ✓ on a level surface
 - ✓ within 6 feet of a grounded, dedicated electrical outlet
- 2. Use an outlet tester to verify that the power outlet meets the required specifications: 115V, 60hz,1.4A.
- 3. Position either a 30 gallon or 16 gallon drum of cleaning fluid at the work site and remove the lid.
- 4. Continue to pump installation.





INSTALLATION

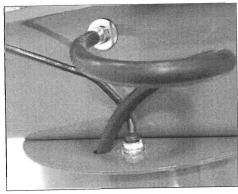
The Model 16 and Model 30 follow the same installation process. The first step involves the pump/sink assembly placement, followed by the lid and fusible link assembly installations. The units include one of two unique sink/ pump assemblies, either the split basket or full basket sink/pump assembly.

SPLIT BASKET SINK/PUMP ASSEMBLY

- Place the pump assembly into the drum of cleaning fluid and secure the half-moon's position on the lip of the drum. Ensure the pump's power cord is accessible.
- 2. Place the sink assembly into the drum. Ensure the sink is resting as illustrated.

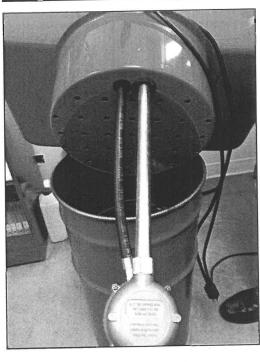


- Connect the sink hose to the pump's quick connect fitting.
- 4. Connect the pump power cord to the lamp assembly's receptacle.
- 5. Place the crumb cup into the sink drain hole.
- 6. Continue to lid assembly.

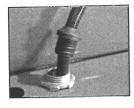




FULL BASKET SINK/PUMP ASSEMBLY



- 1. From the top of the sink basket, notice the pump power cord threaded through one of the holes. Grasp the pump's power cord and use it to guide the pump conduit up through the hole in the bottom of the sink basket, to the corresponding hole located in the top of the basket. Ensure the pump is properly aligned with its white pump screen facing downward, towards the front of the sink.
- 2. From the top of the basket, secure the pump conduit in the open hole. Insert the rubber grommet into the pump conduit and tighten the lock nut onto the pump conduit.

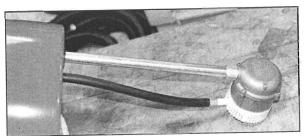






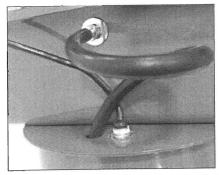
3. Grasp the black pump/sink hose, and from the top of the basket, guide it through the open hole to the hole in the bottom of the basket. Leave the one free end of pump/sink hose exposed from the top of the basket and connect the other end to the pump fitting.





Models 16(C) and 30(C) Operator Booklet

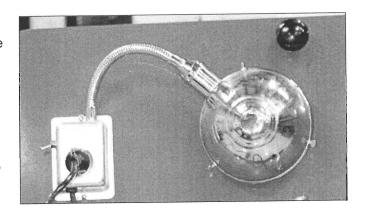
- 4. Place the pump/sink assembly onto the drum of cleaning fluid.
- 5. Connect the free end of the pump hose to the fitting located on the sink's rear wall.
- 6. Connect the pump power cord to the lamp assembly's receptacle.
- 7. Place the crumb cup into the sink drain hole.
- 8. Continue to lid assembly.





LID ASSEMBLY

- 1. Attach the lid knob.
- Using the shorter provided screws, attach the lamp assembly to the outside of the lid. Install the provided light bulb in the lamp and make sure it is operational. Attach the lamp screen using the thumb screws.
- Plug the lamp's power cord into the customer's electrical outlet. Note: M16C and M30C pump is hard wired to the lamp control box.
- 4. Continue to fusible link installation.

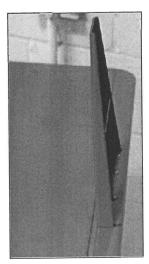


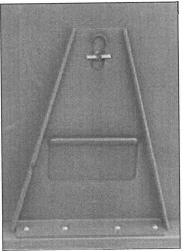
FUSIBLE LINK ASSEMBLY

A Model 16 or 30 will utilize one of two fusible link assemblies.

PEM SCREW BRACKET FUSIBLE LINK ASSEMBLY

- 1. Align the four holes on the fusible link bracket with the four holes located on the rear sink edge. Position with the bracket's flat side facing the sink lid.
- 2. Secure the bracket to the sink with the provided hardware.





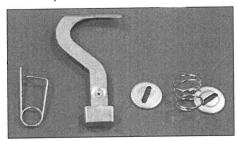


Models 16(C) and 30(C) Operator Booklet

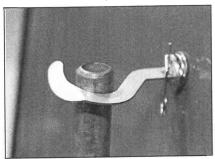
- 3. Raise the lid. From the front of the lid, press and twist the fusible link wingnut to engage the fusible link bracket and secure the lid in an open position.
- 4. The fusible link bracket can also serve as a carrying handle.

J-HOOK/STANDPIPE FUSIBLE LINK ASSEMBLY

- 1. Working from the sink's interior, insert the J-Hook through the hole in the lid so the J-hook is accessible with the lid closed.
- 2. Position the components on the J-Hook in this order:
 - a) First slotted washer
 - b) Compression spring
 - c) Second slotted washer
- 3. Compress the assembled components down to expose the cotter pin hole on the J-Hook.
- 4. Insert the cotter pin as illustrated and secure the pin to hold the entire J-Hook assembly in place.
- 5. Open the lid and position the J-Hook around the standpipe to secure the lid in an open position.







OPERATION

The M16 and M30 operate identically.

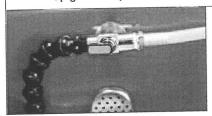
- ✓ The pump and lamp are simultaneously powered on by the lamp assembly's power switch.
- ✓ The hose and brush assembly includes a 3-way adjustable valve to control the flow of cleaning fluid through either the spigot, brush, or both.
- ✓ The lamp is illuminated with the provided light bulb. Do not use light bulbs with a wattage greater than 40 watts.
- ✓ The fusible link assembly holds the sink lid open via the fusible link latch which will melt and disengage from the bracket, allowing the lid to close, in the event of a fire. Do not allow any component, such as the hose/brush assembly, to obstruct the lid's closure.

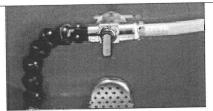
Follow these steps to operate the unit:

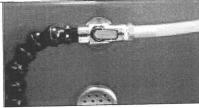
- 1. Ensure the parts washer is connected to a functioning 115V, 60Hz electrical outlet.
- 2. Put on protective eyewear, gloves, clothing, and shoes before operating unit.
- 3. Raise the lid and engage the fusible link assembly to secure the lid in an open position.
- 4. Direct the spigot and brush downward into the sink basin.
- 5. Remove all excess soil and fluids from dirty parts before placing them into sink.
- 6. Toggle the lamp assembly's power switch to turn on the lamp and start the pump.

7. Position part under cleaning fluid stream and begin cleaning.

Hose and Brush Assembly 3-way Valve to Control the Flow of Cleaning Fluid
Spigot "ON" position All "ON" Position Brush "ON" position







- 8. Clean all parts in the sink area. Avoid splashing outside of the sink area. When the flow-thru brush is not in use, it is to be placed inside the sink area.
- 9. Once the cleaning operation is complete, shut down the pump and lamp assemblies, and allow the clean parts to drain completely before removing them from the sink.
- 10. Close the lid.

TROUBLESHOOTING

Problem	Possible Solution		
No Power	 Check power cord connection to a dedicated, grounded and working electrical outlet with sufficient voltage (110V to 125 V). Check that the pump connection to the lamp assembly is secure. 		
Lamp Doesn't Work	 Check power cord connection to a dedicated, grounded and working. electrical outlet with sufficient voltage (110V to 125 V). Check that the LAMP power switch is in the ON position. Replace the bulb (40 watt maximum). 		
Pump Pulsates	 Check that the pump connection to the lamp assembly is secure. Check hoses for blockages or crimps. Remove the sink's crumb cup and/or strainer basket, and check that the pump is fully submerged in cleaning fluid in the drum below. If not, contact your Safety-Kleen representative. 		
Drainage Issue	 Remove debris from the sink's crumb cup and/or strainer basket and dispose of according to local regulations. Do NOT dump debris into the cleaning fluid drum as it will clog the pump assembly. Ensure the unit is placed on level ground. 		

SERVICE AND REPAIR

In accordance with your service agreement with Safety-Kleen Systems, Inc., a Safety-Kleen service representative will:

- Install and set up the Safety-Kleen equipment
- Be your primary contact with Safety-Kleen
- Put the name and phone number of the nearest Safety-Kleen branch on the equipment and/or on the inside cover of this booklet
- Provide information about your service contract with Safety-Kleen
- Explain what cleaning fluid is provided with the equipment, provide SDS's and answer any questions about the cleaning fluid

This equipment is to be serviced only by authorized Safety-Kleen personnel using an approved cleaning fluid. If you have any questions, require repairs, or need early service, contact your local branch or Safety-Kleen at 1-800-669-5740. Additional assistance can be found at www.safety-kleen.com.



Safety-Kleen Systems, Inc. 2600 North Central Expressway Richardson, TX 75080

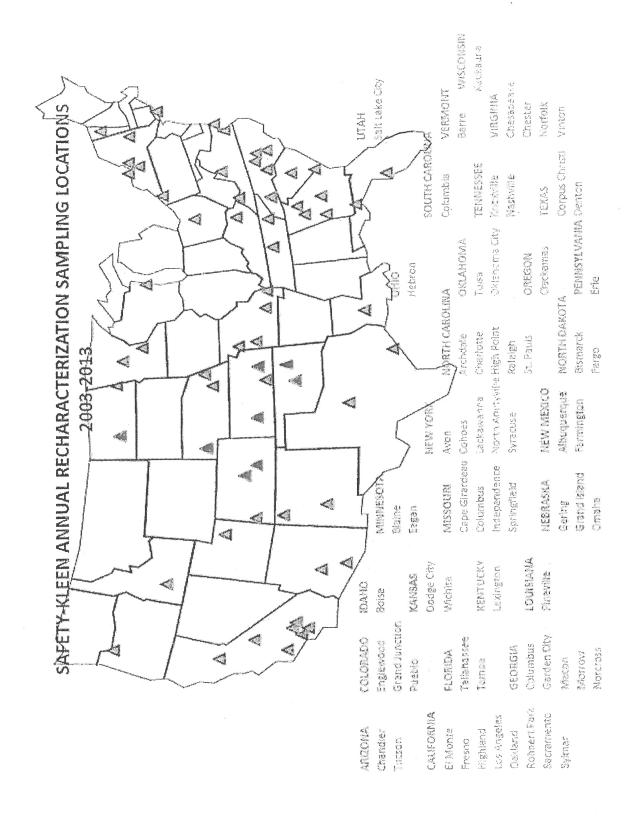


TABLE 5.1-1 PERMITTED/TRANSFER/SITE GENERATED WASTES

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent	S01* S02**	813	D001 and D-Codes Listed in Note Below
Branch-Generated Liquids/Solids (Debris)	S01*	17	D001 and D-Codes Listed in Note Below; F002, F003, F005
Dumpster Sediment	S01*	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01*	Included Above	D001 and D-Codes Listed in Note Below
Used Immersion Cleaner IC699	S01*	28	D-Codes Listed in Note Below
Dry Cleaning Waste (Perchloroethylene)	S01*	315	F002 and D-Codes Listed in Note Below
Dry Cleaning Waste (Naptha-Based)	S01*	Included Above	D001 and D-Codes listed in Note Below.
Paint Wastes	S01*	69	D001, F003, F005 and D-Codes Listed in Note Below
Retain Samples From Used Oil Operations	SOF	3	D008, D018, D039, D040
Spent Aerosol Cans	S01*	> 1	D001, D035
Fluid Recovery Service (FRS) Waste	S01 ***	250	Transfer wastes - waste codes assigned by generator.
Mercury-Containing Lamps/ Devices	N/A***	Less than 2.2	Not applicable - handled as nonhazardous transfer wastes.
Aqueous Brake Cleaner	S01***	20	Transfer wastes – none, unless assigned by generator.

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

- * This waste will be stored in containers in the north or south building container storage area. The maximum capacity in the north area is 5,200 gallons. The maximum capacity in the south area is 12,749 gallons of flammables and 41,220 gallons of nonflammables.
- ** The spent parts washer solvent storage tank has a capacity of 15,000 gallons and may be filled up to 14,250 gallons.
- *** This waste will be held for transfer in containers in the transfer areas. Mercury-containing lamps/devices are stored in the south building flammable storage area.

and/or employee injury. With the exception of parts washer solvent, drummed wastes are loaded/unloaded from the trucks at the docks located on the eastern side of the south and north buildings. The parts washer solvent is loaded/unloaded at the return/fill station. Wastes may be transferred from the north to the south building using hand carts or forklifts. This transfer process will utilize the garage doors on the western side of the north and south buildings.

All containers are transported, moved, and stored carefully in an upright position.

Containers are palletized whenever possible to facilitate shipping and storage. Pallets may be stacked up to seven feet, or two high (whichever is higher), while in storage.

This will prevent the containers from contacting standing liquid while they are in storage. Pallets may be shipped up to three high during transportation. The containers will be arranged so that at least two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling.

INCOMPATIBLE, IGNITABLE, AND REACTIVE WASTE MANAGEMENT

All materials are managed in accordance with the local fire protection code and fire department recommendations. All ignitable wastes are stored at least 50 feet from the property line.

The facility does not routinely manage unwashed containers that may previously have held materials that would be incompatible with wastes stored at the facility. Also, the used parts washer solvents and used aqueous parts washer solvents consist of materials that are compatible and suitable for bulking.

Procedure for Managing Waste Types

The solvents stored at this facility are typically compatible with each other and with other materials handled at this facility. In some isolated instances, special waste segregation procedures may be necessary at this facility. If a waste container requiring segregation is

picked up and transported to the branch (i.e., oxidizer); branch personnel would clear an area in the transfer area and secure with tape to ensure no other incompatible material(s) (flammables/combustibles, organic chemicals, reducing agents) can be stored near the container, or come into contact with the material. Wastes are stored primarily in polyethylene and steel containers. Immersion cleaner, dry cleaning, paint waste, and FRS waste containers are never opened at the Branch. Overpack containers are used for the management of containers whose integrity has been compromised. For ease of inventory control and product integrity, separation and grouping of both used and unused solvents is a standard practice at the Branch. All containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications.

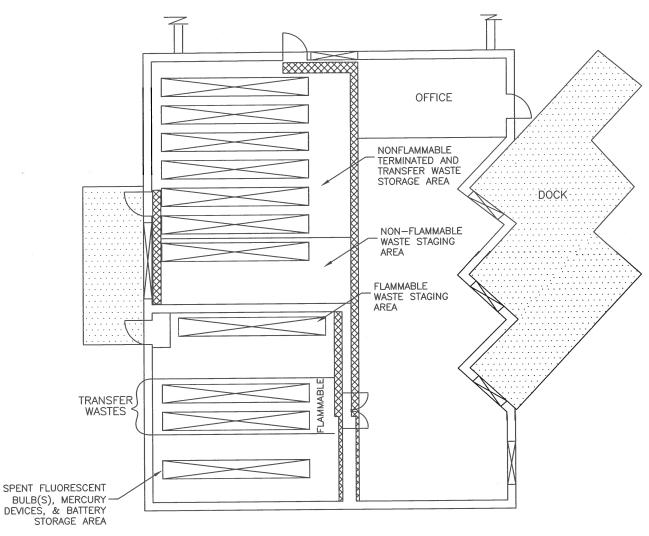
Potential Fire Sources

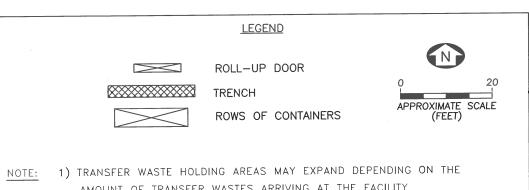
The following is a list of fire prevention and minimization measures:

- All wastes and products are kept away from ignitable sources Personnel must
 confine smoking and open flames to the Branch designated area which is located
 outside the front door of the office area. No other smoking areas are designated.
 The parts washer solvent handling area and the aboveground storage tanks are
 separate from the warehouse area to minimize the potential for a fire to spread or
 injury to personnel to occur.
- 2. Ignitable wastes are handled so that they do not:
 - become subject to extreme heat or pressure, fire, explosion, or a violent reaction – The parts washer solvent waste is stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or subject to violent reactions. The tanks are vented and the containers kept at room temperature to minimize the potential for pressure build-up.
 - produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health The vapor pressure of petroleum-based parts washer solvent is low (2 mm Hg) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers

WITH PERMITTED VOLUMES

FIGURE 8.1-3 CONTAINER STORAGE AREA (SOUTH BUILDING) SAFETY-KLEEN FACILITY TAMPA, FLORIDA





AMOUNT OF TRANSFER WASTES ARRIVING AT THE FACILITY

2) TRANSFER WASTE VOLUMES ARE INCLUDED IN CALCULATING TOTAL ACTUAL STORAGE VOLUME FOR PURPOSE OF COMPARING WITH PERMITTED VOLUMES

- c. Container Storage Area: The north building storage area is a 27' 4" x 28' 4" area with 6" wide x 4" high perimeter curbing and associated collection trenches. The maximum volume of product and waste stored is 5,200 gallons. The waste stored in this area consists of dry cleaner wastes, spent immersion cleaner, and/or antifreeze containers. The south building storage area has two areas. The non-flammable storage area measures 57' 8" x 45' 2", with 6" x 4" high perimeter curbing, collection trenches and a sump. It has the capacity to hold 41,220 gallons of non-flammable product and/or waste. Various halogenated solvents are stored in this area including, but not limited to, dry cleaner wastes, spent immersion cleaner, FRS wastes, and/or antifreeze. The flammable storage area measures 39' 8" x 45' 2", with 6" x 4" high concrete curbing, collection trenches, a sump, and an overflow pipe and containment. Paint wastes, FRS wastes, and tank and dumpster mud (branch debris) are stored in this area along with any other flammable wastes/products. Maximum capacity is 12,749 gal.
- d. South Overflow Pipe and Containment: An overflow containment system connecting to the collection trench in the flammable storage area provides additional storage volume for wastes or fire suppression system overflow from this area. The system consists of a 10" cast iron discharge pipe connecting the collection trench in the flammable storage area to the concrete containment area at the southern end of the tank farm area. This containment area is approximately 17' 11.5' wide x 30' long x 2' high and, with the connecting pipe, provides an approximate storage capacity of 5,492 gallons.

2. Maximum Inventory of Wastes

- a. Used Parts Washer Solvent: 15,000 gallons
- b. Wet Dumpsters: 1008 gallons
- c. Containerized Waste: 59,169 gallons. (Note: This includes any combination of 5, 16, 30, 55, 85-gallon containers, and 350-gallon totes used for various management purposes).

All wastes will be disposed offsite in accordance with appropriate hazardous waste regulations.

Closed-Vent Systems and Control Devices (40 CFR 264.1060)

Since neither a closed vent system nor a control device is required for, or as part of, the equipment ancillary to the facility's hazardous waste storage tank (equipment subject to Subpart BB), demonstrations of compliance with applicable design, operation and maintenance specifications are not required. The Tampa facility will maintain records as part of the facility's operating record that indicate the name and ID of each equipment (i.e., pumps, valves, flanges, open-ended valves, etc.) at the facility. The record will include the type of chemicals managed in each equipment (i.e., light liquid, heavy liquid, etc.) and the state of the chemicals (i.e., gas, vapor, liquid, etc.) and any leaks detected (i.e., visual, >10,000 ppm, etc.) and the date and type of repair performed to repair the leaking equipment. Since Safety-Kleen manages organic chemicals that are nearly 100% by weight organic, it is not required to maintain in the records the concentration of organic chemicals in the waste stream (40 CFR 264.1064(b)(1)(iv)).

AIR EMISSION STANDARDS FOR TANKS, AND CONTAINERS

Safety-Kleen's Tampa facility manages wastes that range in Volatile Organic concentrations up to 100%. Therefore, all wastes managed in containers and in storage tanks are handled as being subject to 40 CFR 264 Subpart CC requirements based on the knowledge of the wastes managed at the facility. Therefore, no analytical waste determination is required.

Subpart CC Tank Standards (40 CFR 264.1084)

The Safety-Kleen Tampa facility manages hazardous wastes in a tank system that consists of one 15,000-gallon storage tank. The tank in this system is subject to Subpart CC requirements as a Level 1 Tank based on tank dimensions and maximum vapor pressure of volatile organic materials managed in this tank (see following table). A list of tank, tank dimensions and maximum vapor pressure of volatile organics managed in tanks subject to Level 1 Tank controls is provided in the following table.

Inspection Requirements for Level 1 Tanks are as follows:

The fixed roof and its closure devices are visually inspected at least annually to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes or gaps in the roof sections; broken, cracked, or damaged seals or gaskets on closure devices; broken or missing hatches, access covers, caps, or other closure devices. A description of inspections and example log for tanks can be found in Part II C.

Level 2 Tanks (40 CFR 264..1084(d))

There are no level 2 tanks at this facility.

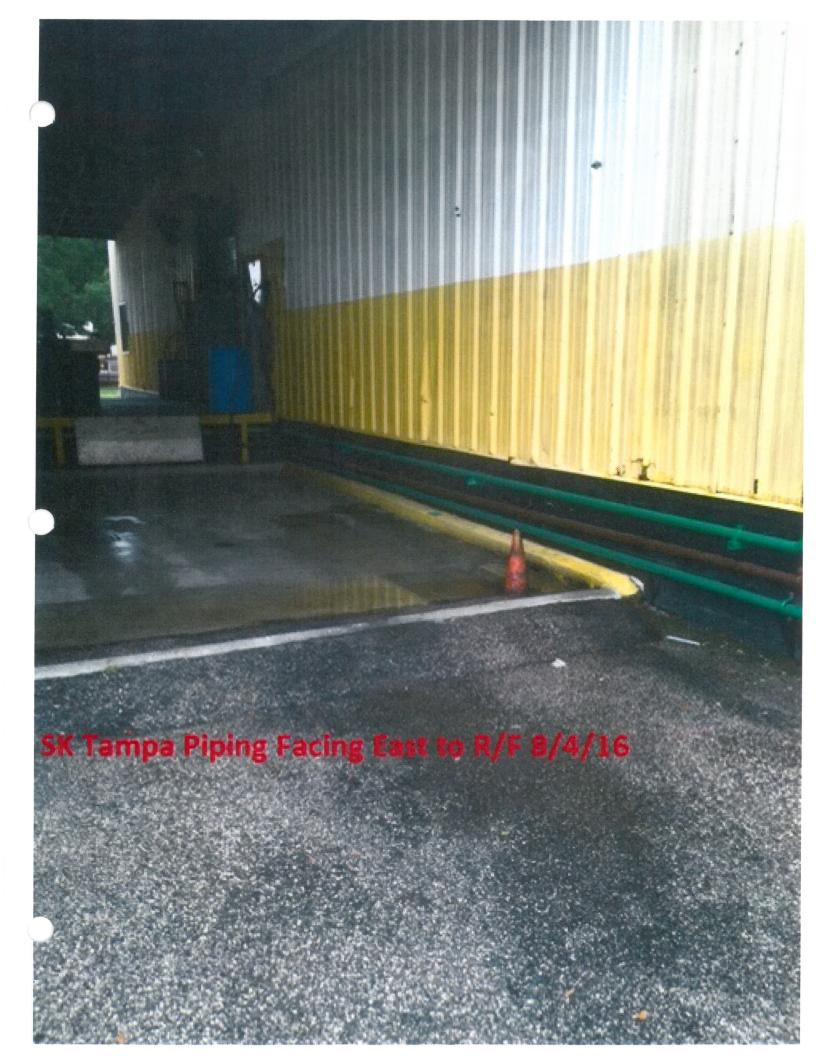
Subpart CC Container Standards (40 CFR 264.1086)

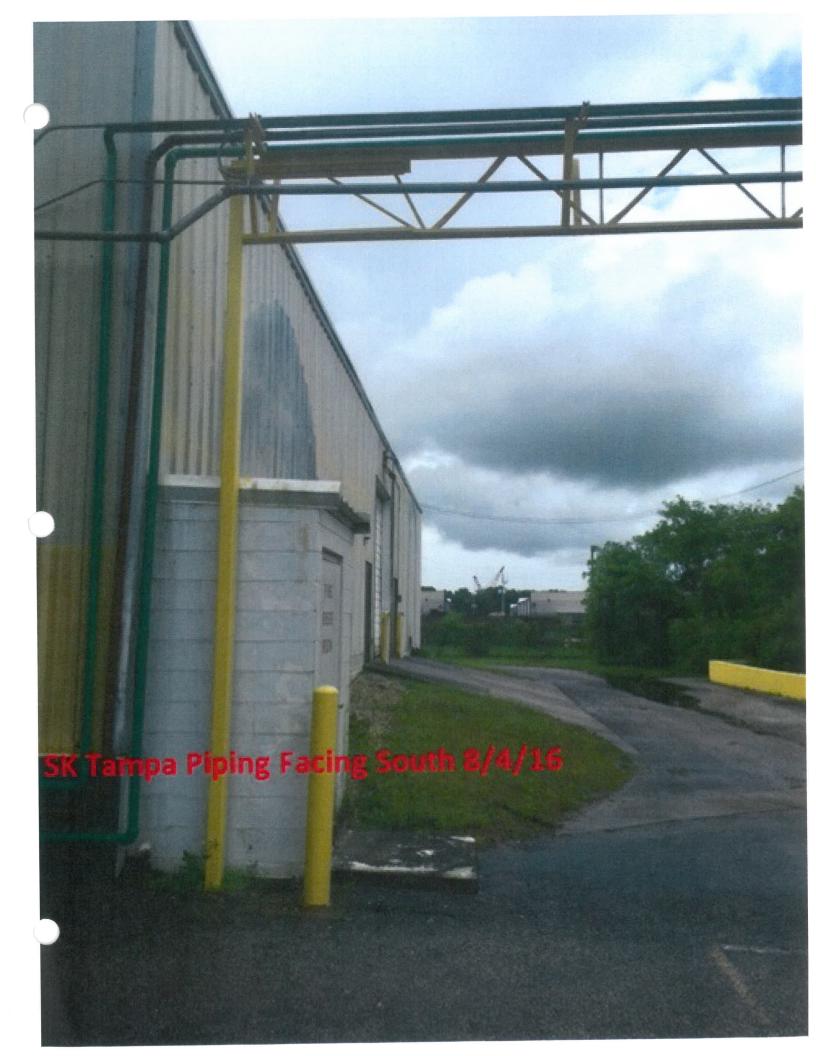
This section is applicable to containers that are greater than 26 gallons that are used to manage hazardous wastes with greater than 500 ppm volatile organic contents.

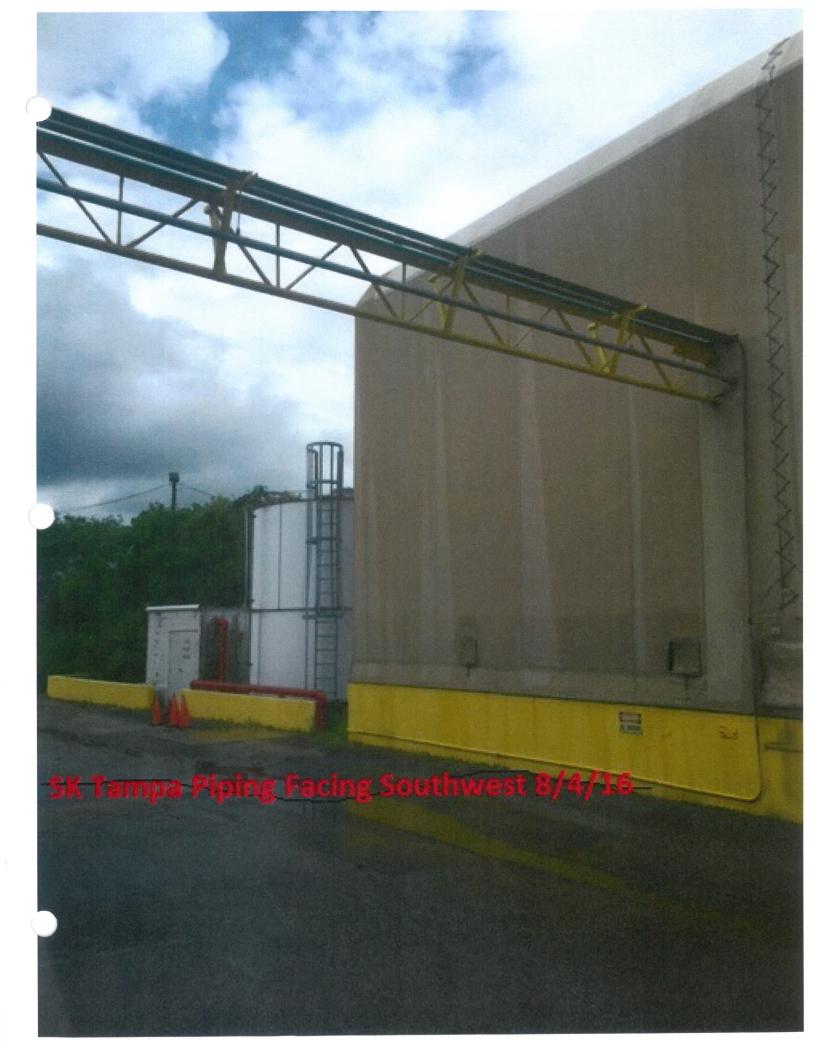
Hazardous waste containers that are filled (generated) at the facility as well as hazardous waste containers that are received from off site are subject to this rule. Table 11.2-2 provides a summary of the areas, and types of containers managed, at the Tampa facility for which Subpart CC is applicable.

Level 1 Containers (40 CFR 264.1086(c))

Containers greater than 26 gallons but less than 119 gallons and containers greater than 119 gallons used in heavy material service (<0.038 psia) are to be-controlled in accordance with one of the following Level 1 container standards as follows:









ERM-South, Inc.

Environmental Resources Management

W.O. No. _____ Sheet 3 of 4 Project SAFETY-KLEEN TAMPA Subject TANK CONTAINMENT AREA By J. J. G. Date 5/31/95 Chkd by CAPA

REVISED CALCULATIONS > REFLECTS INSTALLATION OF A THIRD 15,000 GALLON TANK AND A FABRIC COVER OVER THE TANK FARM

TANK DISPLACEMENT.

R = TANK RADIUS = 5.25 FT.

H = TANK HEIGHT = 3.9 FT - .72 FT = 3.18 FT BELOW DIKE

> VOL = T-R2H $VOL = (3.142)(5.25)^{2}(3.18) = 275.392$

TANK = 275, 392 FT3

275.392 FT3 x 7.481 GAL = 2060.2 GAL

VOLUME OF LARGEST TANK

15,000 GAL x 1 FT3
7.481 GAL = 2005.08

15,000-GALLON HAZARDOUS WASTE SOLVENT TANK TANK FARM AREA (INSIDE CONTAINMENT) TANK FARM AREA (INSIDE CONTAINMENT) 69 3" PIPING 7 17@ 18@ 16@ FIGURE 11.1-1
ENVIRONMENTAL PIPING SCHEMATIC FOR HAZARDOUS WASTE SOLVENT TANK
SAFETY-KLEEN SYSTEMS, INC. FACILITY
TAMPA, FLORIDA 0 SATELLITE . ACCUMULATION . CAN (TYP.) (2) MAIN PUMP FLEXIBLE THOSE (TYP.) RETURN/FILL AREA (INSIDE CONTAINMENT) RETURN/FILL AREA (INSIDE CONTAINMENT) 6 DRAIN FROM DRIP PAN (TYP.) 0 Ó (2) 2" THER ADED ELBOW
(3) 2" THER ADED ELBOW
(4) 2" THER ADED ELBOW
(5) 2" THER ADED ELBOW
(6) 2" THER ADED ELBOW
(7) 2" THER ADED BLID WALVE
(8) 1" 1/2" THER ADED BALL VALVE
(9) WASTE WINERAL SPIRITS RECIRCULATION PUMP
(10) 1" 1/2" THER ADED BALL VALVE
(11) 1" THER ADED BALL VALVE
(12) WASTE WINERAL SPIRITS RECIRCULATION PUMP
(13) WASTE WINERAL SPIRITS RECIRCULATION PUMP
(14) 3" THER ADED BALL VALVE
(15) WASTE WINERAL SPIRITS PUMP
(15) WASTE WINERAL SPIRITS PUMP
(16) 3" THER ADED CHECK VALVE
(16) 3" THER ADED CHECK VALVE
(16) 3" THER ADED CHECK VALVE
(17) 3" THER ADED CHECK VALVE
(18) 3" THER ADED CHECK VALVE
(19) 3" THER ADED CHECK VALVE
(10) 3" THER ADED CHECK VALVE
(11) 4" THE ADED CHECK VALVE
(12) 4" THER ADED CHECK VALVE
(13) 4" THER ADED CHECK VALVE
(14) 4" THER ADED CHECK VALVE
(15) 4" THER ADED CHECK VALVE
(16) 5" THER ADED CHECK VALVE
(17) 4" THER ADED CHECK VALVE
(18) 5" THER ADED CHECK VALVE
(18) 5" THER ADED EQUIPMENT SCHEDULE
WASTE MINERAL SPIRITS
RK EQUIPMENT DESCRIPTION

