

D.E.P.
FEB 26 1996
SOUTHWEST DISTRICT
TAMPA

Certified Mail # Z 132 776 646

February 16, 1996

Mr. John H. Hankinson
Regional Administrator
United States Environmental Protection Agency
Region IV
345 Courtland Street, NE
Atlanta, GA 30365

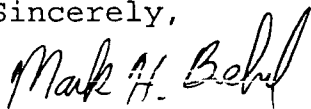
RE: Affidavit of Publication
Laidlaw Environmental Services of Bartow, Inc.
EPA ID # FLD 980 729 610

Dear Mr. Hankinson:

Enclosed is the Affidavit of Publication for the public notice in the Winter Haven News Chief. The notice was published on February 5, 1996.

Should you have any questions or need further information concerning this matter, please contact myself or Mark Behel at 941-533-6111.

Sincerely,



Mark H. Behel
Regulatory Compliance Manager

Enclosure:

pc: Paul W. Manak
E. Lin Longshore
Richard Garrity, Ph.D - FDEP, Tampa District
Satish Kastury, - FDEP, Tallahassee Office

The News Chief

Winter Haven, Florida

Published Daily

WINTER HAVEN, POLK COUNTY, FLORIDA

RECEIVED

FEB 16 1996

Case No. _____ Docket _____ Page No. _____

STATE OF FLORIDA }
COUNTY OF POLK } ss

Before the undersigned authority personally appeared.....

George MacConnell

, who on oath says that he is

Business Manager

of The News Chief, a newspaper

published at Winter Haven, in Polk County, Florida; that the attached copy

of advertisement, being a Public Notice

in the matter of modification to LESB's Resource Conservation

and Recovery Act (RCRA) permit

in the Court, was published in said newspaper

in the issues of February 5, 1996

Affiant further says that The News Chief is a newspaper published at Winter Haven, in said Polk County, Florida, and that said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Winter Haven, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission, or refund for the purpose of securing this advertisement for publication in said newspaper.

Signed

Sworn to and subscribed before me this 15th day

of February A.D. 19 96 by George MacConnell

who is personally known to me or who has produced ()
as identification.

Caroline B. Nixon
Notary Public



CAROLINE B. NIXON

MY COMMISSION # CC314039 EXPIRES

September 14, 1997

BONDED THRU TROY FAIR INSURANCE, INC.

My Commission Expires:

PUBLIC NOTICE

Laidlaw Environmental Services
of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, FL 33830

Laidlaw Environmental Services of Bartow, Inc. (LESB) located at 170 Bartow Municipal Airport, Bartow, Florida will hold a public meeting on March 19, 1996 at 7:00 pm. The meeting will be held in the Spence Room at the Bartow Civic Center. The Bartow Civic Center is located at 2250 South Floral Avenue, Bartow, Florida 33830.

The purpose of the meeting is to allow the public the opportunity to comment on a modification to LESB's Resource Conservation and Recovery Act (RCRA) permit. The modification is required due to the promulgation of new waste listings by the U.S. Environmental Protection Agency (EPA). The new wastes are carbamate related wastes generated in production of certain carbamate chemicals. These wastes were previously not regulated by RCRA. The modification will allow LESB to continue to manage these newly identified waste at the facility located at 170 Bartow Municipal Airport. Also included in the modification is the addition of a fifth recycling unit at the facility. The unit is a small (approximately 30 gallons/hour) distillation unit designed to recycle the chemicals which are manufactured to replace freon and other CFC compounds.

Comments may be submitted orally or in writing during the public meeting. Written comments may also be submitted between February 5, 1996 and April 5, 1996 to the EPA. Ms. Jan Martin is EPA's contact person responsible for answering questions and accepting comments pertaining to LESB's permit modification. The permittee's compliance history during the life of the permit being modified is available from the Agency contact person. The Agency's (EPA) contact person can be reached at the following address:

U.S. Environmental Protection Agency
Region IV
345 Courtland Street, NE
Atlanta, GA 30365

The permittee's contact persons are Mr. Paul Manak or Mr. Mark Behel. They can be reached by calling 941-533-6111.

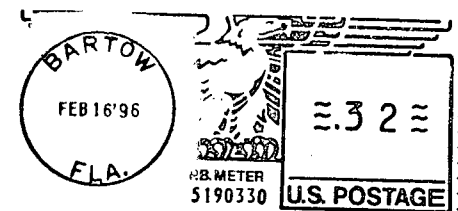
Copies of the existing permit and permit modification may be reviewed between the hours of 8:00 am and 5:00 pm at the following location:

Laidlaw Environmental Services
of Bartow, Inc.
170 Avenue D Bartow Municipal
Airport
Bartow, FL 33830

This notice is hereby given on February 5, 1996.

February 5, 1996 wh8777

L A I D L A W
ENVIRONMENTAL
SERVICES



Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

ATTN: RICHARD GARRITY



Federal Express Next Day Airbill # 181 2067 372

February 5, 1996

Mr. John H. Hankinson
Regional Administrator
United States Environmental Protection Agency
Region IV
345 Courtland Street, NE
Atlanta, GA 30365

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FEB - 6 1996

RE: Class 2 Permit Modifications
Laidlaw Environmental Services of Bartow, Inc.
EPA ID # FLD 980 729 610

U.S. Environmental Protection
SOUTHWEST DISTRICT

Dear Mr. Hankinson:

On February 9, 1995, the EPA issued its final rule (FR 60 7824) for listing as hazardous 65 new waste codes which are known as the carbamate wastes. The new codes are as follows:

K156, K157, K158, K159, K160, K161, P127, P128, P185, P188,
P189, P190, P191, P192, P194, P196, P197, P198, P199, P201,
P202, P203, P204, P205, U271, U277, U278, U279, U280, U364,
U365, U366, U367, U372, U373, U375, U376, U377, U378, U379,
U380, U381, U382, U383, U384, U385, U386, U387, U389, U390,
U391, U392, U393, U394, U395, U396, U400, U401, U402, U403,
U404, U407, U409, U410, U411

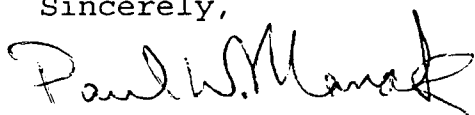
Based on our evaluation of the new rules and the wastestreams which may become hazardous as a result of the new listings, it was determined that Laidlaw Environmental Services of Bartow, Inc. (LESB) could manage the wastestreams subject to this listing. As such, LESB requested a Class 1 Permit Modification to our existing RCRA permit on August 8, 1995 to add these newly regulated codes in accordance with 40 CFR 270.42 to allow continued management of these new wastes at the facility.

These new wastes are compatible with the wastes the facility is currently permitted to manage. Also, receiving and handling the wastes will not require any additional management standards, units, or treatment processes. They will be managed in the existing tanks and container management areas. Therefore, only two sections of the RCRA/HSWA permit need to be modified. Section VI.A needs modified to add the new wastes codes. Section VI.B needs modified to indicate that the referenced TCLP method does not apply to these 65 new waste codes. Suggested modified wording for Permit Conditions VI.A. and VI.B are enclosed.

Also, on September 1, 1994, LESB submitted a permit modification request (Class 1) to add a distillation unit to reclaim HCFC compounds. The agency sent comments to LESB concerning the request on January 20, 1995 and LESB responded on March 14, 1995. On August 3, 1995, EPA replied to LESB's response, indicating that a Class 2 modification was needed along with the Subpart BB information. The August 3, 1995 reply also indicated, that a Class 2 modification should be submitted after the unit began operation. The unit began operation on February 2, 1996. Also enclosed is an updated list of Subpart BB equipment which includes the ones associated with the HCFC still.

Should you have any questions or need further information concerning this matter, please contact myself or Mark Behel at 941-533-6111.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul W. Manak". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul W. Manak
Facility Manager

Enclosures:

pc: Mark Behel
E. Lin Longshore
Richard Garrity, Ph.D - FDEP, Tampa District
Satish Kastury, - FDEP, Tallahassee Office

PROPOSED WORDING FOR HSWA PERMIT CONDITIONS

V.E. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

V.E.1 The permittee may vent emissions from the following wastes subject to the terms of this permit as follows:

<u>Vent Identification</u>	<u>Hazardous Waste Management Unit</u>	<u>Description of Hazardous Waste</u>
1.	Vacuum Still	Organic Solvents
2.	Thin Film Evaporator	Organic Solvents
3.	Distillation Column	Organic Solvents
4.	Freon Wash Tank	Organic Solvents

V.E.2 The permittee may operate the following unit subject to the terms of this permit as follows. The unit is equipped with a closed vent which vents no emissions to the atmosphere.

<u>Vent Identification</u>	<u>Hazardous Waste Management Unit</u>	<u>Description of Hazardous Waste</u>
None	HCFC Still	Organic Solvents

PART VI - TOXICITY CHARACTERISTIC/CARBAMATE WASTES

VI.A Authorized Toxicity Characteristic and Carbamate Waste Codes

1. D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015, D016, D017, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043,
2. K156, K157, K158, K159, K160, K161, P127, P128, P185, P188, P189, P190, P191, P192, P194, P196, P197, P198, P199, P201, P202, P203, P204, P205, U271, U277, U278, U279, U280, U364, U365, U366, U367, U372, U373, U375, U376, U377, U378, U379, U380, U381, U382, U383, U384, U385, U386, U387, U389, U390, U391, U392, U393, U394, U395, U396, U400, U401, U402, U403, U404, U407, U409, U410, U411

VI.B Waste Analysis Plan

1. The permittee must analyze the waste listed under Condition VI.A.1 above utilizing the Toxicity Characteristic Leaching Procedure (TCLP). The TCLP (Method 1311) is specified under 40 CFR 261 Appendix II.
2. The permittee must analyze the waste listed under Condition VI.A.2 above in accordance with the facility's Waste Analysis Plan in the state operating permit.

LADLAW ENVIRONMENTAL SERVICES OF BARTOW, INC.
EQUIPMENT LIST
Revised 02/05/96

EQUIPMENT D#	EQUIPMENT CLASS	TYPE	SIZE	PROCESS AREA	LOCATION	SERVICE	CONC. TOT. ORGANICS	METHOD OF COMPLIANCE	INSPECTION REQUIREMENT	MONITORING REQUIREMENT
2	Valve	BV	1	E	VAPOR BALANCE SYSTEM NORTH OF FUEL BLEND AREA	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
5	Valve	BV	6	E	T-112 side out pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
7	Valve	CV	1	E	CHECK VALVE ON AIR LINE	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
10	Valve	CV	1	E	T-112 side out air	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
25	Valve	BV	6	E	3' cuoff to portable I/O 2" hose conn.	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
30	Valve	BV	6	E	T-112 3" air bleed # 1	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
35	Valve	BV	3/4	E	T-112 3" air bleed # 2	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
45	Valve	BV	3	E	T-112 Line out post pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
50	Valve	BV	3	E	T-112 DP inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
55	Valve	BV	3	E	T-112 Basket filter	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
60	Valve	BV	1/2	E	T-112 Bkt filter pres relf	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
61	Valve	BV	1/2	E	T-112 Basket filter pres relf	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
65	Valve	BV	3	E	T-112 DP inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
75	Valve	BV	1 1/2	E	T-112 DP discharge cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
80	Valve	BV	3/4	E	T-112 DP dis side air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
85	Valve	CV	1	E	T-112 DP dis side air CV	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
90	Valve	BV	2	E	T-112 DP dis line I/O pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
95	Valve	BV	3	E	T-112 Bot tank drain Val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
140	Valve	BV	3	E	T-111 Gear pump dis cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
145	Valve	BV	3	E	T-111 Dis cutoff non exp mp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
150	Valve	BV	3	E	T-111 Bottom tank drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
155	Valve	BV	3	E	MM Tank drn line to load S	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
160	Valve	BV	3/4	E	MM Air line tank drn S	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
165	Valve	BV	1	E	MM Air line drn upper N	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
170	Valve	BV	3	E	MM Air line drn lower N	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
175	Valve	BV	3	E	MM Tank drn line drums	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
180	Valve	BV	2	E	MM Bot tank port pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
185	Valve	CV	1	E	MM Bot tank air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
190	Valve	BV	6	E	MM side out pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
205	Valve	BV	6	E	MM Gorator inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
210	Valve	BV	2	E	MM Side out pmp drn & port pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
215	Valve	BV	1	E	MM Gorator inlet air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
225	Valve	BV	4	E	MM Gorator dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
230	Valve	BV	1	E	MM Gorator dischg air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
235	Valve	BV	4	E	MM Cut fr Gor to Muff M	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
240	Valve	BV	4	E	MM Cut fr Gor to T-112 & 4	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
245	Valve	BV	2	E	T-114 Blend line to T-114	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
247	Valve	BV	2	E	Top of T-114 Blend Line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
250	Valve	BV	2	E	MM Blend line to Muf M	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
255	Valve	BV	4	E	MM Cut fr Gor to T-114	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
260	Valve	BV	4	E	MM Cut fr Gor to T-112	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
262	Valve	BV	6	E	T-114 BOTTOM OF TANK DRAIN	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
267	Valve	BV	2	E	T-114 Side outlet pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
270	Valve	BV	1	E	T-114 Side out to pump I/O 2" hose	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
280	Valve	BV	1	E	T-114 Filter inlet drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
280.5	Valve	BV	1	E	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
281	Valve	BV	1	E	Second valve; T-114 Filter inlet drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
282	Valve	BV	3	E	T-114 BASKET FILET INLET CUTOFF	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
285	Valve	BF	1 1/2	E	T-114 Basket Filter	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
290	Valve	BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
291	Valve	BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
293	Valve	BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
295	Valve	BV	1/2	E	T-114 Filter outlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
305	Valve	BV	3	E	T-114 DP dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
310	Valve	CV	1	E	T-114 DP dischg cutoff airline	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
320	Valve	BV	1/2	E	DRM PMP Filter Pres relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
321	Valve	BV	1/2	E	DRM PMP Filter Pres relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
325	Valve	BV	2	E	DRM PMP DP inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
335	Valve	BV	2	E	DRM PMP DP dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
340	Valve	BV	1	E	DRM PMP DP dischg line drn	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
345	Valve	BV	1	E	DRM PMP DP dis air line H/U W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
367	Valve	BV	2	E	HOSE con trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
370	Valve	BV	3	E	DRM PMP Dis 3" C/O to Trs(UNE)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
372	Valve	BV	2	E	HOSE con trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
375	Valve	BV	2	E	UPPER NE drum pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
380	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
382	Valve	BV	3	E	W HOSE con trck loading frm fuel blend	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
385	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
387	Valve	BV	3	E	E HOSE con trck loading frm fuel blend	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
390	Valve	BV	3	E	UPPER NE fr T-114 to Trk Load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY

395	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
400	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
405	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
410	Valve	BV	4	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
415	Valve	BV	4	E	UPPER NE fr Gor to T-112	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
420	Valve	BV	3	E	UPPER SE fr T-111 to T-112	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
425	Valve	BV	2	E	UPPER SE T-112 blend line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
430	Valve	BV	2	E	UPPER SE MM/T-114 blend line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
435	Valve	BV	2	E	UPPER SE T-111 blend line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
440	Valve	CV	3	E	UPPER SE T-111 dischg line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
445	Valve	BV	2	E	UPPER SE T-111 dischg line cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1010	Valve	BV	4	D	BOTTOM outlet to pmp cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1015	Valve	BV	1	D	BOTTOM outlet to pmp cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1015.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1017	Valve	BV	1	D	Bottoms Outlet Alt/Drain 2nd Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1030	Valve	BV	2	D	RECIR line cutoff(pot)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1035	Valve	BV	1	D	RECIR line drain	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1045	Valve	CV	3	D	BOTTOMS line pmp dis	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1050	Valve	BV	1	D	BOTTOMS line pmp bleed/air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1051	Valve	BV	1	D	2nd Valve Drain line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1051.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1055	Valve	BV	1/2	D	BOTTOMS pump gauge cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1060	Valve	BV	1/2	D	BOTTOMS pump gauge drain	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1065	Valve	BV	3	D	BOTTOMS pmp dis to cool cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1070	Valve	BV	1	D	BOTTOMS inlet to H-305 air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1070.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1075	Valve	GV	3/4	D	H-305 cool prod drn line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1080	Valve	BV	3	D	H-305 cool outlet cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1085	Valve	BV	2	D	H-305 dis line-in trans E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1090	Valve	BV	1 1/2	D	SIDE out to sight glass	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1095	Valve	BV	1 1/2	D	SIGHT glass drain	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1100	Valve	GV	3/4	D	SIGHT glass tube valve bottom 1st	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1105	Valve	GV	3/4	D	SIGHT glass tube valve 2nd up	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1110	Valve	GV	3/4	D	SIGHT glass tube valve 3rd up	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1115	Valve	GV	3/4	D	SIGHT glass tube valve 4th up	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1135	Valve	BV	1	D	TOP pressure gauge cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1140	Valve	BV	1	D	BOTTOM col return - S-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1141	Valve	BV	1	D	2nd Drain Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1145	Valve	BV	1	D	BOTTOM col return S-302 drn in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1150	Valve	BV	1	D	BOTTOM col return S-302 drn in at S-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1151	Valve	BV	1	D	BOTTOM col return S-302 drn in at S-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1155	Valve	BV	1	D	S-302 side out sample line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1156	Valve	BV	1	D	S-302 side out sample line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1160	Valve	PSV	6	D	S-302 vapor PSV (vents-R-303)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1165	Valve	PSV	3	D	COL prod vapor (vents-R-303)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1170	Valve	BV	1/2	D	COL out to pres switch W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1175	Valve	BV	1/2	D	COL out to pres switch E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1180	Valve	CV	1	D	VAC relief val top F-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1185	Valve	BV	1/2	D	SDE out top col ladder	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1190	Valve	BV	1/2	D	SDE out near top col	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1195	Valve	BV	1/2	D	SDE out 1/3 down top col	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1200	Valve	BV	1	D	BOTTOM tank drn line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1205	Valve	BV	2	D	TO reflux pmp cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1210	Valve	BV	1	D	REFLUX pmp in air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1220	Valve	BV	1	D	REFLUX pmp dis to gauge & smpl in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1225	Valve	BV	1 1/2	D	REFLUX PUMP TO PORTPMP/DR CON	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1230	Valve	BV	1/2	D	REFLUX PMP DIS SAMPLE LINE	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1235	Valve	BV	1 1/2	D	REFLUX pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1240	Valve	CV	1 1/2	D	REFLUX pmp dis in to prod	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1245	Valve	BV	1	D	FLOW meter(prod) in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1250	Valve	BV	1	D	FLOW meter(prod) in drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1255	Valve	BV	1	D	FLOW meter(prod) B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1260	Valve	BV	1	D	FLOW meter(prod) out drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1265	Valve	BV	1	D	FLOW meter(prod) out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1275	Valve	BV	1	D	COL prod out to air contri val in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1280	Valve	BV	1	D	COL prod out to air contri valve in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1285	Valve	BV	1	D	COL PRODLIN AIRCON VBP	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1286	Valve	BV	1	D	COL PRODLIN BP GAUGE LINE	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1290	Valve	BV	3/4	D	PROD in air val dis drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1290.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1291	Valve	BV	3/4	D	PROD in air val dis drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1295	Valve	BV	1	D	PROD in air contri val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1300	Valve	BV	1	D	PROD in air contri val dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1305	Valve	AV	1 1/2	D	PROD in trans stat cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1310	Valve	BV	2	D	PROD in hose con in trans E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

1315	Valve	BV	1 1/2	D	PROD In return to S-302 (low)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1320	Valve	BV	1 1/2	D	PROD In return to S-302 (up)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1325	Valve	BV	2	D	FILL In cut at tank (up)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1327	Valve	BV	2	D	Bottom of Tank Drain	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1330	Valve	BV	2	D	FILL In con In trans E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1331	Valve	BV	2	D	Feed Filter Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1332	Valve	BV	1	D	Feed Filter Inlet Drain # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1332.1	Valve	BV	1	D	Feed Filter Inlet Drain # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1332.5	Valve	BV	1	D	Feed Filter Inlet Nitrogen Connection	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1333	Valve	BV	1	D	Feed Filter Outlet Drain # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1333.1	Valve	BV	1	D	Feed Filter Outlet Drain # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1334	Valve	BV	2	D	Feed Filter Outlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1335	Valve	BV	1 1/2	D	REFLUX pmp dis In to col top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1340	Valve	BV	1 1/2	D	REFLUX pmp dis In to CKV B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1345	Valve	CV	1	D	REFLUX pmp dis In to drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1350	Valve	BV	1 1/2	D	REFLUX pmp dis In to contrl val in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1355	Valve	BV	1 1/2	D	REFLUX pmp dis In to contrl val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1360	Valve	BV	1 1/2	D	REFLUX pmp dis In to contrl val out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1365	Valve	BV	1 1/2	D	REFLUX pmp dis In to contrl val B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1370	Valve	BV	1	D	REFLUX flow meter in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1375	Valve	BV	1	D	REFLUX flowmeter in drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1380	Valve	BV	1	D	REFLUX flowmeter B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1385	Valve	BV	1	D	REFLUX flowmeter out drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1390	Valve	BV	1	D	REFLUX flowmeter out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1395	Valve	BV	1/2	D	REFLUX In to top col/gauge In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1400	Valve	GV	1	D	BOTTOM sightglass val R-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1405	Valve	GV	1	D	TOP sightglass val R-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1415	Valve	GV	1	D	R-302 vent line to chiller	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1600	Valve	BV	3	D	BOTTOM tank out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1605	Valve	BV	3	D	BOTTOM tank recirc water cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1610	Valve	BV	3	D	SIDE out to pmp top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1615	Valve	BV	3	D	SIDE out to pmp middle	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1620	Valve	BV	1	D	PUMP in basket filter drn In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1625	Valve	GV	1	D	PUMP in drn In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1635	Valve	CV	3	D	PUMP dis line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1640	Valve	BV	1/2	D	PUMP dis gauge/sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1645	Valve	BV	1/2	D	PUMP dis sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1650	Valve	BV	1	D	PUMP dis air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1650.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1655	Valve	BV	3	D	PUMP dis to In recirc In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1660	Valve	BV	3	D	PUMP dis to trans cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1665	Valve	BV	2	D	PUMP dis con trans E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1670	Valve	BV	2	D	INLET feed In to tank top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1675	Valve	BV	1	D	SIDE out sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1676	Valve	BV	1	D	SIDE out sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1680	Valve	GV	3/4	D	SIGHT glass val (bottom)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1685	Valve	GV	3/4	D	SIGHT glass val (top)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1690	Valve	GV	3	D	BOTTOM tank In/out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1695	Valve	BV	1	D	BOTTOM tank In/out cut air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1695.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1696	Valve	BV	1	D	BOTTOM tank In/out cut air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1700	Valve	GV	3	D	BOTTOMS pmp in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1705	Valve	BV	1	D	BOTTOMS pmp in filter drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1710	Valve	GV	1	D	BOTTOMS pmp in In drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1720	Valve	CV	3	D	BOTTOMS pmp dis check val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1725	Valve	GV	1/2	D	BOTTOMS pmp dis In to gauge/sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1730	Valve	GV	1/2	D	BOTTOMS pmp dis In to sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1735	Valve	GV	3/4	D	BOTTOMS pmp dis In drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1740	Valve	BV	1	D	BOTTOMS pmp dis air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1741	Valve	BV	1	D	BOTTOMS pmp dis air con, 2nd valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1745	Valve	BV	3	D	BOTTOMS pmp return tank	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1746	Valve	CV	3	D	CHECK valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1750	Valve	GV	3	D	BOTTOMS pmp cut trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1755	Valve	BV	2	D	BOTTOMS pmp dis con trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1760	Valve	BV	2	D	FILL In con In trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1765	Valve	BV	1	D	SAMPLE val on manway cover	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1770	Valve	GV	3/4	D	SIGHT glass val bottom	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1771	Valve	BV	1	D	Sight Glass Drain (Bottom)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1772	Valve	BV	1	D	Sight Clean Out (Bottom)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1773	Valve	BV	1	D	Sight Clean Out (top)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1774	Valve	BV	1	D	Sight Clean Out (top)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1775	Valve	GV	3/4	D	SIGHT glass val top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1776	Valve	PSV	3	D	PRESS val top vac	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1777	Valve	GV	3/4	D	Vacuum Still PSV	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1778	Valve	GV	2	D	PROD return In from condenser to top vac	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

1780	Valve	BV	3/4	D	SAMPLE/air con bot H-101 (top)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1785	Valve	BV	3/4	D	SAMPLE/air con bot H-101 (bottom)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1790	Valve	GV	2	D	TOP in In to R-101	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1795	Valve	PSV	1	D	TOP R-101	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1796	Valve	PSV	1	D	TOP R-101	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1805	Valve	GV	1	D	DRAIN In from R-103 K/O pot	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1810	Valve	BV	1 1/2	D	R-101 bottom tank to pmp in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1815	Valve	CV	1 1/2	D	R-101 bottom tank to pmp in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1830	Valve	CV	2	D	R-101 pmp dis In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1835	Valve	GV	1/2	D	R-101 pmp dis In (samp/gauge) In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1840	Valve	BV	1/2	D	R-101 pmp dis In sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1845	Valve	GV	1	D	R-101 pmp dis In air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1850	Valve	GV	1 1/2	D	R-101 pmp dis In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1855	Valve	BV	2	D	R-101 pmp dis In trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1860	Valve	GV	3/4	D	R-101 tank sightglass top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1865	Valve	GV	3/4	D	R-101 tank sightglass bottom	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1870	Valve	GV	1 1/2	D	R-102 tank in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1875	Valve	GV	1	D	R-102 tank vent cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1880	Valve	CV	1	D	R-102 top tank	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1885	Valve	GV	2	D	R-102 vac In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1890	Valve	GV	3/4	D	R-102 tank sightglass top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1895	Valve	GV	3/4	D	R-102 tank sightglass bottom	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1900	Valve	GV	1	D	R-102 bottom tank drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1905	Valve	GV	2	D	R-102 Prod pmp in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1910	Valve	BV	1/2	D	R-102 Prod pmp in filter drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1910.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1925	Valve	CV	1 1/2	D	R-102 Prod pmp dis ck val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1930	Valve	BV	1	D	R-102 Prod pmp dis gauge cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1935	Valve	BV	1	D	R-102 Prod pmp dis sample In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1940	Valve	BV	1	D	R-102 Prod pmp dis drum hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1945	Valve	GV	1 1/2	D	R-102 Prod pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1950	Valve	GV	1 1/2	D	R-102 Prod pmp dis air conv:ive in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1955	Valve	AV	3/4	D	R-102 Prod pmp dis air con val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1960	Valve	GV	1 1/2	D	R-102 Prod pmp dis air contrl val out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1965	Valve	GV	1	D	R-102 Prod pmp dis air contrl val B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1970	Valve	BV	2	D	R-102 Prod pmp dis Trans con W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1975	Valve	BV	2	D	TRANS feed in con W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2005	Valve	GV	2	D	FEED pmp B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2010	Valve	GV	2	D	FEED pmp in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2017	Valve	GV	1	D	FEED pmp steam conn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2020	Valve	GV	2	D	FEED pmp out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2022	Valve	GV	3	D	H-202 bottom receiver cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2025	Valve	GV	2	D	H-202 prod pmp in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2030	Valve	BV	1	D	H-202 prod pmp in drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2035	Valve	CV	2	D	H-202 prod pmp in chk val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2045	Valve	BV	1/2	D	H-202 prod pmp sample In 1st val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2050	Valve	BV	1/2	D	H-202 prod pmp sample In 2nd val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2055	Valve	CV	1 1/2	D	H-202 prod pmp dis chk val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2060	Valve	BV	1	D	H-202 prod pmp dis airh con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2060.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2065	Valve	GV	1/4	D	H-202 prod pmp dis flowmtr con 1st	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2070	Valve	GV	1/4	D	H-202 prod pmp dis flowmtr con 2nd	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2075	Valve	BV	1/2	D	H-202 prod pmp TFE sightgl wash	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2080	Valve	BV	1/2	D	TFE sightglass wash in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2081	Valve	GV	1/4	D	Sight Glass Internal Wash Cutoff (East)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2082	Valve	GV	1/4	D	Sight Glass Internal Wash Cutoff (West)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2083	Valve	BV	1	D	Press Val Top TFE	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2085	Valve	BV	1 1/2	D	H-202 pmp air contrl val in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2090	Valve	AV	1	D	H-202 pmp air contrl val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2095	Valve	BV	1 1/2	D	H-202 pmp air contrl val out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2100	Valve	BV	1	D	H-202 pmp air contrl val B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2105	Valve	BV	2	D	H-202 prod pmp trans con W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2110	Valve	BV	1 1/2	D	H-202 prod pmp R-210 overhd recv	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2120	Valve	GV	3/4	D	R-201 sightglass bot val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2125	Valve	GV	3/4	D	R-201 sightglass top val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2130	Valve	GV	1 1/2	D	R-201 bot out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2142	Valve	BV	2	D	R-201 prod pmp wts hose conn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2145	Valve	GV	3/4	D	H-202 sightglass bottom val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2150	Valve	GV	3/4	D	H-202 sightglass top val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2155	Valve	BV	1	D	VAC In cut R-202	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2160	Valve	BV	1/2	D	H-202 vac In gauge cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2162	Valve	BV	1/2	D	H-202 vac In gauge cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2165	Valve	GV	1	D	R-104 K/O pot bot tank drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2170	Valve	BV	2	D	R-104 out vac pmp	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2180	Valve	BV	3	D	BOTTOMS In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

2185	Valve	BV	1	D	BOTTOMS In steam in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2190	Valve	BV	1	D	BOTTOMS In steam in drn	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2195	Valve	BV	3	D	BOTTOMS In, bots pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2196	Valve	BV	3	D	BOTTOMS In, bots pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2197	Valve	BV	2	D	TFE BOTTOMS PUMP INLET CUTOFF	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2202	Valve	BV	1	D	TFE BOTTOMS PUMP OUTLET DRAIN	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2204	Valve	BV	1.5	D	TFE BOTTOMS PUMP OUTLET CUTOFF	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2205	Valve	CV	3	D	BOTTOMS pmp dis chk val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2210	Valve	BV	2	D	BOTTOMS pmp dis hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2215	Valve	BV	2	D	BOTTOMS pmp dis R-201 cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2220	Valve	GV	3	D	BOTTOMS pmp dis trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2225	Valve	BV	2	D	BOTTOMS pmp dis trans con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2230	Valve	GV	3	D	BOTTOMS pmp dis R-2/R-3 cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2235	Valve	GV	1	D	BOTTOMS pmp dis steam In con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2240	Valve	CV	1	D	BOTTOMS pmp dis steam In con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2245	Valve	BV	3	D	BOTTOMS In trans W/frn trans W to R-2/R-3	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2250	Valve	BV	2	D	BOTTOMS In trans W/frn trans W to R-2/R-3 trans hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2255	Valve	BV	3	D	R-2 in In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2260	Valve	BV	3	D	R-3 in In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2265	Valve	BV	1/2	D	R-2 in In gauge cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2275	Valve	BV	3	D	SIGHT glass opening	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2280	Valve	FD	3	D	Pres relief disc	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2290	Valve	BV	1	D	VACUUM vent In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2300	Valve	BV	1/2	B	GAUGE In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2305	Valve	FD	3	D	Pres relief disc	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2310	Valve	BV	3	B	SIGHT glass cover val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2315	Valve	GV	1	B	VACUUM/Vent In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2325	Valve	GV	6	B	BOTTOM out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2330	Valve	GV	6	B	BOTTOM out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2335	Valve	BV	1	B	BOTTOMS pmp in drn In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2340	Valve	BV	3	B	BOTTOMS pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2345	Valve	BV	3	B	BOTTOMS pmp B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2355	Valve	BV	3	B	BOTTOMS pmp out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2360	Valve	BV	1	B	BOTTOMS pmp out air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2361	Valve	BV	1	B	BOTTOMS pmp out air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2365	Valve	BV	3	B	BOTTOMS pmp out hose con 3"	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2370	Valve	BV	3	B	BOTTOMS pmp out trans cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2375	Valve	BV	2	B	BOTTOMS pmp trans con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2380	Valve	BV	2	D	W trans In to E trans (S)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2385	Valve	BV	2	D	E trans from W trans (L) (N)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2390	Valve	BV	2	D	E trans to W trans (U) (S)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2395	Valve	BV	2	D	W trans In from E trans (N)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2500	Valve	BV	2	D	TFE vacuum system from R-204 top	Vapor	> 10 %	Vacuum	N/A	N/A
2505	Valve	AV	2	D	AUTO control valve	Vapor	> 10 %	Vacuum	N/A	N/A
2510	Valve	BV	2	D	AUTO valve bypass	Vapor	> 10 %	Vacuum	N/A	N/A
2515	Valve	BV	2	D	(useless valve)	Vapor	> 10 %	Vacuum	N/A	N/A
2520	Valve	BV	2	D	VENT cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2522	Valve	GV	2	VB	Vent bypass haz/nonhaz	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2523	Valve	BV	1	VB	Vent Sample Line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2524	Valve	BV	2	VB	Vent Cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2525	Valve	GV	2	D	PUMP Inlet cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2530	Valve	GV	1/2	D	PUMP Inlet gauge cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2540	Valve	BV	1	D	VACUUM pmp discharge drain	Vapor	> 10 %	Vacuum	N/A	N/A
2545	Valve	BV	2	D	VACUUM pmp water return cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2550	Valve	BV	2	D	VACUUM still vac sys from R-103 top	Vapor	> 10 %	Vacuum	N/A	N/A
2555	Valve	AV	2	D	AUTO control valve	Vapor	> 10 %	Vacuum	N/A	N/A
2560	Valve	BV	2	D	AUTO valve bypass	Vapor	> 10 %	Vacuum	N/A	N/A
2565	Valve	BV	2	D	(useless valve)	Vapor	> 10 %	Vacuum	N/A	N/A
2570	Valve	BV	2	D	VENT cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2571	Valve	BV	1	VB	Vent behind S-101, for drum loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2572	Valve	BV	1	VB	Vent Sample line on Vacuum Still	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2573	Valve	BV	2	VB	Vent Cutoff on Vacuum Still	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2574	Valve	GV	2	VB	Vent Cutoff on Vacuum Still second valve	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2575	Valve	GV	2	D	PUMP Inlet cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2580	Valve	GV	1	D	PUMP Inlet gauge cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2590	Valve	BV	1	D	VACUUM pmp discharge drain	Vapor	> 10 %	Vacuum	N/A	N/A
2595	Valve	BV	2	D	VACUUM pmp water return cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2600	Valve	BV	2	D	TFE vacuum still; vacuum pmp line cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2700	Valve	GV	0.5	VB	Vent water reslv. Top of sightglass	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2705	Valve	GV	0.5	VB	Vent water reslv. Bottom of sightglass	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2710	Valve	BV	1/2	VB	Vent water reslv. Bottom of sightglass drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2715	Valve	BV	1	VB	Water Inlet	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2725	Valve	BV	1/2	VB	Pump outlet Sample line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2727	Valve	BV	1/2	VB	Drain Sample Line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2728	Valve	BV	1	VB	2nd Water Feedline	Liquid	> 10 %	Inspection/Monitoring		MONTHLY

2730	Valve	BV	1/2	VB	Pump Outlet guage cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2735	Valve	BV	1	VB	Vent water tank drainline	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2740	Valve	BV	1/2	VB	Press. switch cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2745	Valve	BV	2	VB	Auto air vent cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2750	Valve	BV	1	VB	Vent for drum loading by west transfer station	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5000	Valve	BV	3	C	TOP in In crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5001	Valve	PRV	18	C	Top Of T-101	Vapor	>10%	Inspection/Monitoring	MONTHLY
5002	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-101	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5003	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-101	Vapor	>10%	Inspection/Monitoring	MONTHLY
5005	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5010	Valve	BV	2	C	In/out In top of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5015	Valve	BV	2	C	In/out In bot of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5020	Valve	GV	6	C	BOTTOM of cone out to pmp	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5025	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5030	Valve	BV	3	C	TOP in In at crude, trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5031	Valve	PRV	18	C	Top of crude tank T-102	Vapor	>10%	Inspection/Monitoring	MONTHLY
5032	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-102	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5033	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-102	Vapor	>10%	Inspection/Monitoring	MONTHLY
5035	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5040	Valve	BV	2	C	I/O In top cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5045	Valve	BV	2	C	I/O In bot of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5050	Valve	GV	6	C	BOTTOM of cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5052	Valve	BV	3	C	Second cutoff at Bottom of Cone	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5055	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5060	Valve	BV	3	C	TOP in In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5061	Valve	PRV	18	C	Top of crude tank T-103	Vapor	>10%	Inspection/Monitoring	MONTHLY
5062	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-103	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5063	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-103	Vapor	>10%	Inspection/Monitoring	MONTHLY
5065	Valve	BV	2	C	HOSE con I/O at top of tank	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5070	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5075	Valve	BV	2	C	I/O In top of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5080	Valve	BV	2	C	I/O In bot of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5085	Valve	GV	6	C	BOTTOM of cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5090	Valve	GV	6	C	BOTTOM cone clean out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5092	Valve	BV	3	C	Second Cutoff at Bottom of Cone on T-103	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5095	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5100	Valve	BV	3	C	TOP in In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5101	Valve	PRV	18	C	Top of crude tank T-104	Vapor	>10%	Inspection/Monitoring	MONTHLY
5102	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-104	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5103	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-104	Vapor	>10%	Inspection/Monitoring	MONTHLY
5105	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5110	Valve	BV	2	C	I/O In top of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5115	Valve	BV	3	C	I/O In bot cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5117	Valve	BV	3	C	2nd Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5120	Valve	GV	6	C	BOTTOM cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5125	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5130	Valve	BV	3	C	TOP in In at crude, trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5131	Valve	PRV	18	C	Top of crude tank T-105	Vapor	>10%	Inspection/Monitoring	MONTHLY
5132	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-105	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5133	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-105	Vapor	>10%	Inspection/Monitoring	MONTHLY
5135	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5140	Valve	BV	2	C	I/O In top of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5145	Valve	BV	2	C	I/O In bot of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5150	Valve	GV	6	C	BOTTOM of cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5152	Valve	BV	3	C	Second Cutoff at Bottom of Cone on T-105	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5155	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5160	Valve	BV	3	C	TOP in In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5161	Valve	PRV	18	C	Top of crude tank T-106	Vapor	>10%	Inspection/Monitoring	MONTHLY
5162	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-106	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5163	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-106	Vapor	>10%	Inspection/Monitoring	MONTHLY
5165	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5170	Valve	BV	2	C	I/O In top of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5175	Valve	BV	2	C	I/O In top of cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5180	Valve	GV	6	C	BOTTOM cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5182	Valve	BV	3	C	Second Cutoff at Bottom of Cone on T-106	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5185	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5190	Valve	BV	3	C	TOP in In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5191	Valve	PRV	18	C	Top of crude tank T-107	Vapor	>10%	Inspection/Monitoring	MONTHLY
5192	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-107	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5193	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-107	Vapor	>10%	Inspection/Monitoring	MONTHLY
5195	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5200	Valve	BV	2	C	I/O In top cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5205	Valve	BV	2	C	I/O In bot cone to/frm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5210	Valve	GV	6	C	BOTTOM cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5212	Valve	BV	3	C	Second Cutoff at Bottom of Cone on T-107	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

5215	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5220	Valve	BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5221	Valve	PRV	18	C	Top of crude tank T-108	Vapor	>10%	Inspection/Monitoring	MONTHLY
5222	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-108	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5223	Valve	Byfly	3	C	Vapor Balance Cutoff to Tank T-108	Vapor	>10%	Inspection/Monitoring	MONTHLY
5225	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5230	Valve	BV	2	C	I/O In top cone to/frn trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5235	Valve	BV	2	C	I/O In bot cone to/frn trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5240	Valve	GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5242	Valve	BV	3	C	Second Cutoff at Bottom of Cone T-108	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5245	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5250	Valve	BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5251	Valve	PRV	18	C	Top of crude tank T-109	Vapor	>10%	Inspection/Monitoring	MONTHLY
5252	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-109	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5253	Valve	Byfly	3	C	Vapor Balance Cutoff to Tank T-109	Vapor	>10%	Inspection/Monitoring	MONTHLY
5255	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5260	Valve	BV	2	C	I/O In top cone to/frn trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5265	Valve	BV	2	C	I/O In top cone to/frn trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5270	Valve	GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5272	Valve	BV	3	C	Second Cutoff Valve At Bottom Of Cone T-109	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5275	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5280	Valve	BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5281	Valve	PRV	18	C	Top of crude tank T-110	Vapor	>10%	Inspection/Monitoring	MONTHLY
5282	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-110	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5283	Valve	Byfly	3	C	Vapor Balance Cutoff to Tank T-110	Vapor	>10%	Inspection/Monitoring	MONTHLY
5285	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5290	Valve	BV	2	C	I/O In top cone to/frn trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5295	Valve	BV	2	C	I/O In bot cone to/frn trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5300	Valve	GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5302	Valve	BV	3	C	Second Cutoff Valve At Bottom Of Cone T-110	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5305	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5310	Valve	BV	3	C	T-105-T-109 isolation val, under T-110 bots in to pmp	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5315	Valve	BV	3	C	T-105-T-110 cut, in to trans in (T-110 side)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5320	Valve	BV	3	C	T-101-T-105 cut, in to trans in (T-105 side)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5325	Valve	CV	1	C	AIR con in to 100s/trans in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5330	Valve	BV	1	C	AIR con in to 100s/trans in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5375.5	Valve	BV	1	C	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5335	Valve	BV	2	C	HOSE con cut 100 - trans W in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5337	Valve	BV	2	C	HOSE connection	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5355	Valve	BV	2	C	T00 trans W cut b/w T-110/T-109	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5360	Valve	BV	1	C	T00 trans W cut b/w T-110/T-109 drn in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5365	Valve	BV	2	C	TRANS W hose con frn T-100s bot	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5370	Valve	BV	3	C	TO crude pmp cut, b/w T-102 & T-103	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5375	Valve	BV	3/4	C	CRUDE pmp in drn/air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5375.5	Valve	BV	1	C	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5376	Valve	BV	3/4	C	CRUDE pmp in drn/air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5380	Valve	BV	3	C	CRUDE in to dycon pmp b/w T-107 & 8	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5385	Valve	GV	3	C	CRUDE in to dycon, hose con N side dycon	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5390	Valve	BV	3	C	DYCON pmp in cut frn 100 tks	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5395	Valve	GV	3	C	CRUDE in to dycon, hose con S side of dycon	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5405	Valve	BV	3/4	C	DYCON pmp dis drn/air	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5406	Valve	BV	3/4	C	DYCON pmp dis drn/air	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5410	Valve	BV	3	C	DYCON pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5415	Valve	BV	1/2	C	CRUDE tks gear pmp filter in drn in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5415.5	Valve	BV	1	C	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5416	Valve	BV	1/2	C	CRUDE tks gear pmp filter in drn in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5422	Valve	BV	3/4	C	Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5430	Valve	BV	3	C	TRUCK load gear pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5435	Valve	BV	3	C	TRANS in frn crude trk load to trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5440	Valve	BV	2	C	TRANS in frn crude trk load to trans W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5445	Valve	BV	2	C	CUT in trans W to T-105 in for Fuel Blend pmp under T-110	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5450	Valve	BV	2	C	FUEL blend pmp in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5465	Valve	CV	1	C	FUEL blend pmp dis in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5470	Valve	BV	2	C	FUEL blend pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5500	Valve	BV	3	VB	On jib crane in front of T-103	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5505	Valve	BV	1	VB	On jib crane east of T-100 tanks	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5505.5	Valve	BV	1	C	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5510	Valve	BV	1	VB	Vapor balance system by T-110	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5520	Valve	BV	1	C	Truck Loading Centrifugal Pump Inlet Drain # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5525	Valve	BV	1	C	Truck Loading Centrifugal Pump Inlet Drain # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5530	Valve	BV	3	C	Truck Loading Centrifugal Pump Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5535	Valve	BV	1	C	Filter Pressure Relief # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5536	Valve	BV	1/2	C	Filter Pressure Relief # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5540	Valve	BV	1	C	Filter Outlet Drain # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5545	Valve	BV	1	C	Filter Outlet Drain # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

5550	Valve	BV	1	C	Truck Loading Centrifugal Pump/Filter outlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5800	Valve	BV	2	VB	On Crane In Front Of T-103	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5805	Valve	BV	2	VB	On Crane In Field East of T-100 Tanks	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5810	Valve	BV	1	VB	Vapor Balance System By T-110	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6000	Valve	BV	0.5	T/P	3" Hose Conn - Double female - Double valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6005	Valve	BV	0.5	T/P	3" Hose Conn - Double female - Double valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6010	Valve	BV	0.5	T/P	3" Hose Conn - Double female - Double valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6015	Valve	BV	0.5	T/P	3" - 2" Female to Male reducer	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6020	Valve	BV	0.5	T/P	3" - 2" Female to Male reducer	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6025	Valve	BV	0.5	T/P	Drum Filling Hose	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6035	Valve	BV	0.5	T/P	Diaphragm Pump Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6045	Valve	BV	0.5	T/P	Diaphragm Pump Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6050	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6055	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6060	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6065	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6070	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6075	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6080	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6085	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6090	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6095	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6100	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6105	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6110	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6115	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6120	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6125	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6130	Valve	BV	2	T/P	Protatable Filter Bottom Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6131	Valve	BV	2	T/P	Filter Vent	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6135	Valve	BV	2	T/P	2" Steam Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6140	Valve	BV	3	T/P	3" Double Female Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6145	Valve	BV	3	T/P	3" Double Female Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6150	Valve	BV	3	T/P	3" Male to Female 1st Relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6151	Valve	BV	3	T/P	3" Male to Female 2nd Relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6155	Valve	BV	3	T/P	3" Air Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6160	Valve	BV	3	T/P	3" Air Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6165	Valve	BV	3	T/P	3" Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6170	Valve	BV	3	T/P	3" Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6175	Valve	BV	2	T/P	2" Outlet to Protatable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6180	Valve	BV	0.5	T/P	Air Bleed Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6185	Valve	BV	0.5	T/P	Pump Portable Discharge Bleed	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6190	Valve	BV	0.5	T/P	Air bleed for filter on portable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6200	Valve	BV	2	T/P	2" Female Air	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6205	Valve	BV	0.5	T/P	Portable Pump Filter Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6208	Valve	BV	0.5	T/P	2nd Pressure Relief Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6210	Valve	BV	0.5	T/P	Portable Pump Inlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6220	Valve	BV	1.5	T/P	1.5" Drain on portable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6221	Valve	BV	2	T/P	2" Male to 2" Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6225	Valve	BV	2	T/P	2" Male to 2" Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6230	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6235	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6510	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6515	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6520	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6525	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7045	Valve	BV	3	T/P	3" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7050	Valve	BV	3	T/P	3" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7318	Valve	BV	0.5	T/P	Drain Valve #1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7319	Valve	BV	0.5	T/P	Drain Valve #2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7320	Valve	BV	3	T/P	Inlet Cutoff to 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7330	Valve	BV	0.5	T/P	Pressure Relief Basket Filter	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7340	Valve	BV	3	T/P	Portable Pump Inlet cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7350	Valve	BV	3	T/P	Portable Pump Outle Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7355	Valve	BV	3	T/P	Pressure relief - 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7360	Valve	BV	3	T/P	Pressure relief - 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7365	Valve	BV	0.5	T/P	1st Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7370	Valve	BV	0.5	T/P	2nd Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7375	Valve	BV	0.5	T/P	2nd Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7385	Valve	BV	0.5	T/P	1st Pressure relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7390	Valve	BV	0.5	T/P	2nd Pressure relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7395	Valve	BV	2	T/P	Portable Pump Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7405	Valve	BV	2	T/P	Pump Discharge Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7410	Valve	BV	0.5	T/P	1st Drain Valve on Pump Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7415	Valve	BV	0.5	T/P	2nd Drain Valve on Pump Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

7465	Valve	BV	1.5	T/P	Fill Cutoff	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7470	Valve	BV	1.5	T/P	Fill Cutoff	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7475	Valve	BV	1.5	T/P	Nitrogen Fitting	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7485	Valve	BV	2	T/P	2nd Drain	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7490	Valve	BV	2	T/P	Double Female	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7495	Valve	BV	2	T/P	Double Female	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7600	Valve	BV	1.5	T/P	Fill Cutoff	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7605	Valve	BV	1.5	T/P	Steam Relief	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7610	Valve	BV	1.5	T/P	Nitrogen Fitting	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7615	Valve	BV	2	T/P	Fill Cutoff	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7620	Valve	BV	1.5	T/P	Nitrogen Fitting	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7625	Valve	BV	3	T/P	Double Female Relief	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7630	Valve	BV	3	T/P	Male/Female Relief	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7635	Valve	BV	3	T/P	Male/Female Relief	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7640	Valve	BV	3	T/P	Male/Female Relief	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7645	Valve	BV	3	T/P	Male/Female Relief	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7650	Valve	BV	3	T/P	Male/Female Relief	Liquid	> 10%	Inspection/Monitoring	MONTHLY
7660	Valve	BV	2	T/P	Fill/Cut Valve	Liquid	> 10%	Inspection/Monitoring	MONTHLY
8002	Valve	CV	0.5	D	In Feed to HCFC Still	Liquid	> 10%	Inspection/Monitoring	MONTHLY
8003	Valve	SOLE	0.5	D	In Feed to HCFC Still	Liquid	> 10%	Inspection/Monitoring	MONTHLY
8004	Valve	BV	0.75	D	Drain valve from HCFC Still	Liquid	> 10%	Inspection/Monitoring	MONTHLY
8005	Valve	BV	0.5	D	Drain valve from HCFC Still separator tank	Liquid	> 10%	Inspection/Monitoring	MONTHLY
8006	Valve	BV	1	D	Product outlet valve from separator tank	Liquid	> 10%	Inspection/Monitoring	MONTHLY
8007	Valve	BV	3/8	D	Water outlet valve from separator tank	Liquid	> 10%	Inspection/Monitoring	MONTHLY
8008	Valve	PRV	1	D	In HCFC Vapor Balancing System	Liquid	> 10%	Inspection/Monitoring	MONTHLY
8009	Valve	PSV	0.75	D	Vacuum breaker in HCFC vapor balanceing system	Liquid	> 10%	Inspection/Monitoring	MONTHLY

70	PUMP	DP	1.5	E	T-112 Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
135	PUMP	GP	3.0	E	T-111 Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
220	PUMP	GP	6	E	MM Gorator grinder pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
296	PUMP	DP	1.5	E	T-114 Diaphram pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
330	PUMP	DP	1.5	E	DRM PMP Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
1025	PUMP	CP	1.5 X 3.0	D	BOTTOMS/recirculation pmp	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
1215	PUMP	CP	2	D	REFLUX pmp	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
1630	PUMP	CP	1.5 X 3.0	D	T-401 CINTRIFICAL pmp	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
1715	PUMP	CP	1.5 X 3.0	D	Vac Still pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
2015	PUMP	RP	2	D	TFE FEED pmp	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
2200	PUMP	DP	1.5	D	TFE BOTTOMS PUMP	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
5400	PUMP	DP	3	C	CRUDE tank dycon pmp	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
5425	PUMP	GP	3	C	TRUCK load gear pmp	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
5460	PUMP	CP	1.5 X 1	C	FUEL blend pmp (under T-110)	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
5515	PUMP	CP	3	C	Truck Loading Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
6030	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
6195	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
6215	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
7345	Pump	DP	3	T/P	Portable Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
7400	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
7445	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY
8001	PUMP	CP	1 X 0.5	D	HCFC FEED PUMP	Liquid	> 10%	Inspection/Monitoring	WEEKLY	MONTHLY

LEGENDS (equipment class)	
AP	= Air Pump
AV	= Air Valve
Butfly	= Butterfly Valve
BV	= Ball Valve
CP	= Centrifugal Pump
CV	= Check Valve
DP	= Diaphram Pump
GP	= Gear Pump
GV	= Gate Valve
PRD	= Pressure Relief Disc
PRV	= Pressure Relief Valve
PSV	= Pressure Sensitive Valve
QV	= Quick Connect Valve
RP	= Rotary Pump
Sole	= solenoid valve
VP	= Vacuum Pump

SEP - 5 1995

SOUTHWEST DISTRICT
TAMPA

Certified Mail Receipt # Z 436 760 339

August 31, 1995

Mr. G. Alan Farmer, Chief
RCRA Branch
Waste Management Division
Region IV
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, GA 30365

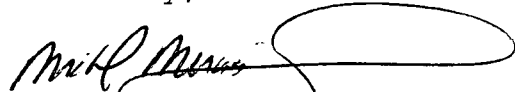
RE: Revised RFI Workplan
Response to EPA's NOI Dated July 5, 1995
Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. # FLD 980 729 610

Dear Mr. Farmer:

Laidlaw Environmental Services of Bartow, Inc. (LESB) has revised the RFI Workplan. The Bethesda, Maryland office of Dames and Moore assisted LESB is revising the workplan. They will be sending you two copies of the workplan under separate cover as well as submitting copies to the Tampa and Tallahassee offices of the FDEP.

If you have questions or need additional information please do not hesitate to contact me or Mark Behel at 813-533-6111.

Sincerely,



Michael Merashoff
Facility Manager

pc: Mark Behel
Ashley Chadwick
E. Lin Longshore
Mr. Bill Crawford - FDEP, Tampa
Certified Mail Receipt # Z 436 760 337
Mr. Satish Kastury - FDEP, Tallahassee
Certified Mail Receipt # Z 436 760 338



7101 WISCONSIN AVENUE, SUITE 700, BETHESDA, MARYLAND 20814-4870
(301) 652-2215 FAX: (301) 656-8059

September 5, 1995

VIA UPS Second Day Air
Tracking No. S177 8838 395

Mr. Bill Crawford
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

Re: Submittal of the Revised Phase I
RCRA Facility Investigation for the
Laidlaw Environmental Services of
Bartow Facility, Bartow, Florida
EPA ID No. FLD 980 729 610

Dear Mr. Crawford:

As directed by Mr. Mark Behel of Laidlaw Environmental Services of Bartow, Inc. (LESB), Dames & Moore is submitting one (1) copy of the above referenced workplan. Copies have also been forwarded to Satish Kastury of the Tallahassee District, and Mr. G. Alan Farmer of EPA, Region IV.

We have also enclosed responses to the comments EPA provided to LESB dated July 5, 1995 to assist you in understanding how the comments were addressed in the revised workplan.

RECEIVED
SEP 07 1995

Department of Environmental Protection
SOUTHWEST DISTRICT

BY _____

Sincerely,

DAMES & MOORE, INC.

Scott McClelland
Project Manager

Enclosures

cc: Mr. Mark Behel, LESB (w/o encl.)

*Filed on shelf
AS
ATTACHMENT - 4-B-1*

**RESPONSES TO EPA COMMENTS
RCRA FACILITY INVESTIGATION WORKPLAN
LAIDLAW ENVIRONMENTAL SERVICES OF BARTOW, INC.**

These responses are numbered in accordance with the numbering system presented in EPA's comments dated July 5, 1995. For brevity, the comments have not been retyped.

GENERAL COMMENTS -- TOPICS NOT COVERED IN WORKPLAN

2.0 SAMPLING AND ANALYSIS PLAN

1. The method of collecting the soil gas samples has been revised to utilize a commercial soil gas vendor utilizing a gas chromatograph which minimizes the potential effect of weather conditions.
2. The plan has been revised to state that the proposed investigations are considered a Phase 1 RFI. While soil sampling and soil gas are still included in the Phase 1, sampling of existing groundwater wells has been added. The need for additional wells will be evaluated in the Phase 1 RFI report, and any additional wells proposed as part of a Phase 2 RFI. This phased approach is consistent with the approach recommended by EPA in their cover letter.
3. Corrective action procedures for the laboratory have been added in the QAPP.

GENERAL COMMENTS -- TOPICS COVERED IN THE WORKPLAN

4. A map depicting drainage patterns of the area has been added to the plan.
5. Information regarding spills at the facility have been added as part of an appendix. It should be noted that there were no documented spills or releases from the facility that could be related to the observed groundwater contamination. Therefore, in Section 2.3, the workplan still presents the most likely source as being runoff from a paved area.
6. The requirement for presenting references for past permits and enforcement actions is not stated in Appendix B of LESB's HSWA permit and was not included in the plan. The relevance of this information to the RFI is unclear, however, a listing of current permits obtained by LESB and enforcement actions has been added as an appendix to this RFI Workplan. A copy of the previous study performed at the facility has also been included as an appendix.
7. Data considered relevant to characterize the source of the release was proposed to be collected in the Draft RFI Workplan. The need to collect additional information on the environmental setting was reviewed, and is considered adequate for the Phase I investigation. Because the primary purpose of this Phase 1 RFI is to identify the source of the release, the need to collect extensive information to characterize the

environmental setting that may be needed should corrective measures be needed is not considered necessary at this time and can be collected during the Phase 2 RFI. This discussion was added to the text in Section 2.2.

8. A new potentiometric surface map has been presented. It should be noted that the reported elevations of the wells are suspect, and as detailed in Section 2.6.3 of the Draft RFI Workplan, re-surveying of these wells is proposed as part of the RFI. Once these elevations are soundly established, historical water level measurements can be used to evaluate groundwater flow directions, groundwater velocity, and seasonal fluctuations in the water table. This analysis was proposed in the Draft RFI Workplan, and is still planned to be performed as part of the Phase 1 RFI report.
9. Based on the known locations of local water supplies, and the observed water levels measured in the on-site wells there are no known influences on the shallow groundwater in the vicinity of the facility. This information was added to the discussion on the environmental setting, and information on local water supply wells was presented in the Draft RFI Workplan in Section 2.5.
10. Because surface water does not runoff of the site, but is channelled into infiltration basins, information on nearby surface water bodies is not considered necessary. However, local runoff patterns were added to Section 2.2 for completeness.
11. The data collected previously were considered to be useful for their intended purpose of identifying the analytes present, and analyses were performed following EPA methodologies by certified laboratories. However because of the length of time that has transpired between the Draft RFI Workplan submittal and EPA review, the collection of an additional round of samples is considered appropriate. Note that information on well construction and design is included in a previous study that has been included as an appendix to the Phase 1 RFI Workplan.

The proposed collection of groundwater samples during the Phase 1 RFI along with the soil gas survey can be used to evaluate the need for additional sampling points in the Phase II RFI.

12. Using a phased approach will enable the extent, origin, direction, and rate of movement of any contamination to be assessed. The goal of the Phase 1 RFI is to confirm the source of the release, confirm the direction of groundwater flow and contaminant migration, and characterize the hazardous contaminants present. If necessary, the Phase 2 RFI will be designed to characterize the extent and rate of movement.
13. Existing data on spills and releases available was reviewed and considered in preparing the Draft RFI Workplan. To date, there are no known spills that have passed outside of secondary containment that were not adequately cleaned up and reported. Based on this review, there was no indication of any other possible source areas; therefore the RFI focused on the most likely source presented in Section 2.3. Copies of spill reports have been added to the workplan as an appendix to support

this conclusion. Given the extent of groundwater contamination identified by previous sampling, the pond is considered to be the most likely source, and investigating other units at the facility where there is no indication of a release is not considered necessary in accordance with the HSWA permit and RFI Guidance.

14. According the RCRA Guidance, potential receptors are those persons or ecological concerns that may be susceptible to the release. As detailed in Section 2.5 of the Draft RFI Workplan, given the nature of the suspected release, the current industrial use of the area, and the fact that surface water does not runoff from the site, there are no complete pathways by which humans or biota could be exposed to the groundwater contamination. Additional text has been added to detail the surrounding land use and demographic information, although the release is not anticipated to impact any of these persons or environs.
15. The primary purpose of the Phase I RFI is to identify the source of the release. While information has been added regarding contaminant fate and transport information of the compounds detected previously, the need to characterize soils in the area of the source is more appropriately conducted during the Phase II RFI once the actual source is located.
16. The soil sampling program and soil gas sampling have been revised.
17. Re-sampling of the wells has been added.
18. An appendix containing the QA plan (QAPP) has been added to the Phase 1 RFI Workplan. A section detailing the data quality objectives and rationale for the objectives is included in the QAPP.
19. The text has been revised to indicate how the soil gas survey will be used to place additional soil samples. If the soil gas does not identify the basin to be the source, two locations are still planned to be collected from the areas proposed in the Draft RFI Plan to confirm the soil gas findings. If the soil gas indicates the basin is the source area, based on the distribution of the soil gas readings, a sampling location will be placed at each of the four sides, and samples collected from depths of 1-2 and 5-6 feet. This distribution will allow the extent of contamination to be defined. If the soil gas survey indicates another source area, these four sampling locations will be adjusted accordingly.
20. Discrete samples are proposed to be collected from depths of 1-2 feet and 5-6 feet. While it is recognized that EPA Region IV's SOPQAM recommends general sampling depths, given the site-specific conditions at the LESB facility, different intervals are proposed for the following reasons: Because the contamination detected previously consists of volatile organics, surface samples are not proposed because these analytes would not be expected to be present at the ground surface five years after their release (pre-1991). Because the water table is present at a depth of around 6 feet, collection of samples from deeper intervals would not characterize vadose zone soils. These two sampling depths are considered

appropriate to define the vertical distribution of contaminants, and text has been added to the plan to further justify their selection.

- 21 (a-c). The soil gas methodology has been completely revised from the use of a PID to the use of commercial soil gas survey subcontractors. Descriptions of how the data will be used, and the methods proposed to be employed are provided in the Phase 1 RFI Workplan.
22. With the removal of the PID as a soil gas survey tool, this comment is no longer applicable.
23. The collection of MS/MSD samples has been added. References have also been added directing the reader to the QAPP presented as an appendix.
24. Documentation procedures have been reviewed and revised as appropriate to fulfill the HSWA permit requirements.
25. The QAPP will provide details of the DQOs for the SW-846 analytical method.
26. Additional information required for data management by the HSWA permit has been added to the data management plan in the Phase 1 RFI Workplan. The QAPP also details data management information, as appropriate.
27. Additional information to be included on the sample labels such as the type of sample, sample collection method, etc. has been added and is included in the QAPP.
28. Details pertaining to the recording of all field equipment, calibration requirements, etc. that will be conducted in the field have been added. Information on the recording of similar information by the lab is included in Appendix C containing the QAPP.
29. Additional data has been added to present how data will be evaluated, validated, and reported. A data validation plan is included as an appendix to the QAPP.
30. TOC referenced in the comment was an oversight in the Draft RFI Workplan. LESB only analyzes the "first flush" for chemical oxygen demand (COD) rather than biological oxygen demand (BOD); therefore TOC data is not available. The text has been corrected accordingly.
31. The only identifiable source of the solvents is from the runoff described on page 2-15 of the Draft RFI Workplan. Because no unremediated spills have occurred outside of secondary containment, no additional sources can be identified using historical data. If the soil gas indicates another source area, soil samples will be located accordingly and the Phase II RFI activities can focus on additional sources that are unknown at this time.

32. The information pertaining to the confining layer is based on the lithologic logs from onsite wells, local geological references, and the RFA. This information is derived from a previous report which has been added as an appendix to the Phase 1 RFI Workplan.
33. A reference directing the reader to a well location map has been added to this section. Information on the existing well construction is provided in the copy of the previous study report attached as an appendix to the Phase 1 RFI Workplan. Because no new wells are proposed to be installed as part of the Phase 1 RFI, additional information regarding monitoring well construction details or drilling methods is not included in this section.
34. The text has been revised to indicate that organic free water will be used for the preparation of trip and field blanks.
35. The text has been revised to indicate that water samples, including field QA/QC samples will be preserved in the field. Procedures used to check the pH of the samples have been added to the SOPs and are referenced in the text.
36. A description of the collection methods for duplicate samples has been added to the SOP 2, and are referenced as appropriate.
37. The analysis of groundwater samples for all analytes present at the facility is not considered to be warranted and is an excessive utilization of limited resources given that previous sampling conducted voluntarily by LESB has provided data that can be reasonably used to limit the analytical parameter list and the project costs. Previous groundwater sampling that resulted in the identification of VOCs as site related contaminants was performed in 1991 for the following compounds by the following analytical methods:

VOCs, EPA 624
SVOCs, EPA 625
Pesticides/PCBs, EPA 608
Metals, EPA 600/4-79-020
pH, EPA 150.1
Conductivity, EPA 120.1
Chlorides, EPA 325.3
Cyanides, EPA 335.2
Nitrates, EPA 352.1
Sulfates, EPA 375.4

The RFI Guidance specifically directs the investigator to the use of previous data to develop a sampling program, and because this data is available, conducting the Phase 1 RFI as though no data is available is not considered to be necessary.

38. The container size has been corrected to 2 oz. containers.

39. Correction has been made.
40. The table has been revised to indicate that HCl is used as a preservative.
41. The trip blanks will be preserved, and this change has been made to the text.
42. This change has been made to the table.
43. A footnote has been added to indicate that the most recent version of the SW-846 method will be used.
44. This comment has been noted, and the Phase 1 RFI report is intended to be submitted in Final form, and the submittal of a final RFI report has been deleted from the schedule.
45. This SOP has been revised to indicate that samples collected will be homogenized except for those collected for VOC analyses.
46. This reference has been revised to list the most current revision number of the analytical method.
47. A sample of the decon water has been added to the SOP. The decon water will be disposed of properly by LESB.
48. The SOP has been revised to state that custody seals will also be placed on the sample containers.
49. The SOP has been revised to state that sample bottles will be placed in plastic bags to prevent cross-contamination from broken or leaking bottles.
50. A plastic bag will be added to the packaging requirements for the cooler. It has been our experience that the use of vermiculite while appropriate for shipping acids and other chemicals because it is adsorbent, is inappropriate for use in packing samples for the following reasons:
 - a. It takes up room that ice packs need, and does not act as an insulator, but rather lessens the effectiveness of the ice.
 - b. Vermiculite must be disposed of as a hazardous waste because it may have come in contact with materials in the cooler.
 - c. The use of this material results in excessive waste generation.

Proper packaging of the cooler and wrapping the bottles in plastic bags has not resulted in excessive bottle breakage. Data quality objectives are developed to account for completeness, and if bottles break during shipment, the samples can be easily recollected.

51. The SOP has been revised to refer to SOP 3--Decontamination procedures--to detail the method proposed to clean the equipment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUL - 5 1995

D.E.P.

4WD-RCRA

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUL 10 1995

SOUTHWEST DISTRICT
TAMPA

Mark H. Behel
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

SUBJ: Notice of Technical Inadequacy, RFI Workplan
Laidlaw Environmental Services of Bartow, Inc.
Bartow, Florida
EPA I.D. No. FLD 980 729 610

Dear Mr. Behel:

Laidlaw Environmental Services of Bartow, Inc. (Laidlaw) submitted a RCRA Facility Investigation Workplan (RFI Workplan) for its facility in Bartow, Florida. The RFI is needed to investigate probable groundwater contamination at the facility, specifically at and around SWMU 4, South Retention Pond.

The United States Environmental Protection Agency (EPA) reviewed the RFI workplan submitted by Laidlaw for the Bartow, Florida facility. The EPA determined the RFI workplan, dated April 15, 1992, to be incomplete. EPA's comments on the workplan are enclosed.

The EPA is recommending that the RFI be conducted in two phases. Phase One would consist of release verification and/or initial release characterization. This phase would include collection of samples from various media within and around SWMU 4, South Retention Pond. These samples will be analyzed for a list of constituents. This list of constituents will be generated from the list of the wastes managed at the facility in conjunction with 40 CFR Part 261, Appendix VIII -- Hazardous Constituents and 40 CFR Part 264, Appendix IX -- Ground-Water Monitoring List.

If a release is confirmed during the first phase or further characterization is necessary, a Phase Two investigation would be required. Phase Two would complete the release characterization, including the nature and extent of the release and the rate of release migration.

EPA recommends Laidlaw use this phased approach in preparing its revised workplan. A workplan would be submitted for Phase One, in accord with the comments on the initial workplan applicable to a Phase One RFI. If a release is confirmed or further characterization is necessary, a workplan will be submitted for Phase Two, along with the Phase One report. The Phase Two workplan would also be prepared in accord with EPA comments on the initial workplan applicable to a Phase Two RFI.

Laidlaw is required to submit a revised workplan by condition II.E.1.d of the Hazardous and Solid Waste Amendments (HSWA) portion of the Resource Conservation and Recovery Act (RCRA) permit issued December 5, 1991 to this facility. Please submit a revised workplan for the Phase One RFI by September 8, 1995 to this address:

Mr. G. Alan Farmer, Chief
RCRA Branch
Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30365

ATTN: RCRA Permitting Section

Failure to comply with any permit condition may result in enforcement action initiated by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. 6928, under which EPA may seek the imposition of penalties of up to \$25,000 per day of continued noncompliance.

If questions arise about the review comments or this letter please contact Jan Martin of the RCRA Permitting Section at (404) 347-3433. If you would like to schedule a meeting to discuss the comments, please contact Jan Martin. For questions regarding compliance and enforcement, please contact Ralph Cline of the RCRA Compliance Section at (404) 347-7603.

Sincerely yours,



G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

Enclosure

cc: Satish Kastury, FDEP, Tallahassee
Bill Crawford, FDEP, Southwest District

**COMMENTS ON RCRA FACILITY INVESTIGATION WORKPLAN
LAIDLAW ENVIRONMENTAL SERVICES OF BARTOW, INC.**

The workplan submitted to EPA by Laidlaw Environmental Services of Bartow, Inc. is insufficient as set out in the following comments. For guidance on RFI workplan requirements please refer to:

1. Appendix B [RCRA Facility Investigation (RFI) Workplan Outline] of the HSWA Portion of Laidlaw's RCRA permit, and
2. Interim Final RCRA Facility Investigation (RFI) Guidance (RFI Guidance), Volumes I - IV.

GENERAL COMMENTS -- TOPICS NOT COVERED IN WORKPLAN

2.0 SAMPLING AND ANALYSIS PLAN

Sampling Strategy -- Sampling Conditions Determination

1. The RFI must describe conditions under which sampling will be conducted. The revised workplan must include a discussion of conditions appropriate for sampling. In particular, requisite weather conditions are crucial to accurate soil gas sampling due to the effects of weather conditions on PID readings.

Sample Media Determination

2. The RFI workplan proposes only the collection of soil and soil gas samples to evaluate the release at the facility. Detection of contaminants in groundwater indicates the need for groundwater samples to verify the release to groundwater and begin release characterization. Groundwater samples must be taken and additional wells proposed.

Sample Analysis -- Corrective Action

3. The RFI workplan does not contain a description of laboratory corrective action procedures. The RFI workplan must be revised to describe the corrective action which will occur if analytical problems are uncovered or encountered.

GENERAL COMMENTS -- TOPICS COVERED IN WORKPLAN

2.0 SAMPLING & ANALYSIS PLAN

2.1 Site Background

4. A map showing drainage patterns at the facility is necessary. It is particularly important because evidence of a release was found in the area of the south storm water retention pond which is a collection area for surface water runoff.
5. Provide information about any spills at the facility, including the approximate dates, amounts, location, response actions, and inspection or technical reports.
6. The workplan must include a summary of past permits requested and/or received; any enforcement actions & subsequent responses, and a list of documents and studies prepared for the facility.

2.2 Environmental Setting

7. The environmental setting section of the RFI workplan is mostly a description of site hydrogeology with a basic description of site soils. As part of an RFI, the HSWA permit requires collection of information to supplement and/or verify Part B information on environmental setting. The HSWA permit specifies inclusion of information on hydrogeology, soil characteristics (as appropriate), surface water and sediment, and air (climate) as part of the investigation. Though the RFI workplan provides some

of this information, it does not delineate the collection of all the data detailed in the permit. If data required by the permit will not be reported, the basis for not reporting or collecting that data must be included in the workplan.

8. A potentiometric surface map showing recent water levels must be included in the revised workplan. The shallow groundwater contour map, figure 2-4, was drawn with 1986 measurements. There is no hard data cited on groundwater elevation, flow direction or velocity. More detailed and more recent groundwater data is needed to address questions such as: What is the current water table elevation, flow rate and flow direction? Has the water table and/or flow direction changed since 1986? Does the water table, flow rate and/or direction of flow fluctuate seasonally?
9. Any man-made influences on groundwater in the vicinity of the facility, such as local water-supply and production wells, must be described in the revised workplan.
10. The HSWA permit requires specific information characterizing surface water bodies in the vicinity of the facility. The revised workplan must include relevant information on surface water bodies or include an explanation as to why it was not included.

2.3 Characterization of the Release

11. The RFI workplan includes limited historical groundwater data to describe the compounds detected in three monitoring wells at the facility in 1991. The usefulness of this data is limited because the workplan presents no information on procedures used to obtain the data, e.g. information on well design and well construction, whether chain-of-custody procedures were followed, or if data quality objectives (DQOs) were met.

The workplan does not propose any groundwater sampling to determine the nature and extent of suspected groundwater contamination. As part of the phased RFI, groundwater samples need to be obtained to begin release

characterization, since a release to groundwater is suspected based on the 1991 data. The existing data should be used to guide the selection of further sampling points.

12. The RFI workplan contains a discussion of the detection of contaminants in monitoring wells at the facility in 1991, but the workplan does not adequately address the data necessary to characterize a release of hazardous constituents. The HSWA permit specifies that the analytical data must be sufficient to define the extent, origin, direction and rate of movement of contamination. This data shall be obtained in accordance with the Sampling and Analysis Plan.

2.4 Characterization of Source Area

13. The source area characterization in the workplan is inadequate. Possible sources of contamination other than the south retention pond must be considered in the workplan.

2.5 Potential Receptors

14. This section is inadequate. Data describing potential receptors is required by the HSWA permit. This data shall describe human populations and environmental systems that are susceptible to contaminant exposure from the facility.

2.6 Sampling & Analysis Program

15. Part of developing a Sampling and Analysis Plan is determining which media to sample; where to sample and which parameters to analyze. The RFI workplan does not adequately address soil and/or contaminant properties which would affect contaminant migration or transformation.
16. Two soil sampling locations are not sufficient. Soil gas sampling cannot be used as a substitute for soil sampling. Use of a photoionization detector (PID) as described in

section 2.6.2 is not a reliable way of confirming the absence of a release, nor is it a reliable way of determining which compounds are present.

17. Groundwater sampling is not included in the Sampling and Analysis program. EPA does not accept the use of soil and soil gas samples to address groundwater contamination.
18. The RFI workplan states that QA/QC procedures will conform with requirements stipulated in the Dames & Moore Comprehensive QA Plan. This plan was not included in the workplan for review. Even if approved by the state, the QA/QC plan must be submitted as part of the RFI workplan and should define the QA/QC measures to be employed to ensure that sampling and analytical work objectives are achieved.

Although the RFI workplan describes some QA/QC procedures to be followed during the project, the procedures are not useful in and of themselves as data quality objectives (DQOs) are not defined. DQOs are qualitative or quantitative statements that outline the decision-making process and specify the quality and quantity of data required to support decisions. See the Guidance for the Data Quality Objectives Process EPA QA/G-4, September 1994 and the U. S. EPA, Region 4, Environmental Compliance Branch's Standard Operating Procedures and Quality Assurance Manual (SOPQAM). Without a delineation of DQOs, required data levels cannot be established and acceptance criteria for data precision, accuracy, comparability, representativeness and completeness cannot be defined.

2.6.1 Soil Sampling

19. Four soil samples collected from two locations are proposed to characterize possible residual soil contamination. The facility permit requires characterization of the vertical and horizontal extent of contamination. Two sampling locations are insufficient to characterize the horizontal extent of contamination. Soil gas sampling might help define the extent of contamination, identify sources or hotspots and therefore aid in locating soil samples, but

there is no provision in the workplan for using soil gas results to place additional soil samples. Additional soil sample locations must be included in the revised workplan. If soil gas analysis will be used to determine any soil sample locations, make that clear in the revised workplan.

20. At each sampling location, discrete soil samples should be taken. The Standard Operating Procedures and Quality Assurance Manual (SOPQAM) specifies the intervals at which samples are generally taken. In general, discrete soil samples should be taken at the surface and at regular intervals until the water table is reached. The SOPQAM also specifies the sample containers required for certain sample types and the information required to correctly identify a sample.

2.6.2 Soil Gas Sampling

21. If soil gas sampling is proposed in the revised workplan, explain how the results will be used and what will be done if soil gases are found. Determining soil sample locations is an example of how soil gas results can be used. The primary purpose of an RFI is to determine the nature and extent of any releases, HSWA permit condition II.E.1.c. Use of a photoionization detector (PID) as described in this section is unlikely to adequately describe the nature or extent of soil contamination at the facility. Some of the reasons are:
 - a. The instrument is not sensitive enough to show there has not been a release. The detection range does not extend to sufficiently low concentrations.
 - b. Because a PID will respond to a wide range of compounds, it is not a reliable way of determining which compounds are present. It is likely to give false positive readings.
 - c. The presence of water vapor makes accurate measurements difficult or potentially impossible.

22. When a PID is used, it should be calibrated, at a minimum, each time it is turned on. A description of procedures to follow in case of calibration failure should be included.

2.6.4 Field QA/QC Samples

23. This section of the workplan should include a description of the collection of a matrix spike/matrix spike duplicate (MS/MSD) sample for analysis. Secondly, this section should be expanded to either include or refer to laboratory QA/QC samples. Finally, this section should include a description of or reference to laboratory performance and system audits. Please refer to the Standard Operating Procedures and Quality Assurance Manual (SOPQAM) and the RFI Guidance.

2.6.5 Sample Containers, Preparation, Chain-of-Custody, and Laboratory Analysis

24. Make sure the documentation procedures described in the RFI workplan include the specific information required by the HSWA permit.
25. Reference to EPA SW-846 method 8240 as the basis for "all aspects of sample analysis" is not sufficient. Please refer to the SOPQAM for guidance and requirements regarding the various aspects of sample analysis listed in the workplan.

3.0 DATA MANAGEMENT PLAN

26. The HSWA permit requires development of a data management plan to document and track investigation data and results. The data management plan must provide a specific listing of what the data record will include and how it will be presented. While some of the components are described in the Sampling and Analysis Plan, the Data Management Plan must include a complete description of the data record. Please consult the HSWA permit for requirements about what data to present and how to present it.

3.1.1 Field Records

27. For each sample, the type of sample must be recorded. For soil or sediment samples, whether it is a grab or composite sample should be noted. Consult the SOPQAM for specific data to be included on labels.
28. All sample collection equipment, field analytical equipment and equipment used for physical measurements should be identified in the logbook. All calculations, results and calibration data should also be recorded in the logbook. See the SOPQAM for more specific information.

3.3 Reporting

29. The RFI workplan does not provide sufficient information on data reduction, validation, and reporting. The data must be accurately maintained and reported in such a way as to make it readily accessible. The workplan must address data and report processing procedures. The workplan must also provide the format which will be used to present the data.

SPECIFIC COMMENTS

2.0 SAMPLING AND ANALYSIS PLAN

2.2 Environmental Setting

30. p. 2-11: There is a reference in the workplan to what is expected in "first flushes". Provide TOC data on "first flushes", the same constituents have apparently been present in excess runoff (runoff directed to stormwater retention basin).

2.3 Characterization of the Release

31. p. 2-13: Include a discussion of the potential sources of the solvents found.

2.6 Sampling and Analysis Program

32. p. 2-16: There is a reference in the workplan to "known confining layers". Provide an explanation as to how these "known confining layers" were identified. Include in the explanation, data about the continuity, permeability, extent and composition of the confining layer(s) in the vicinity of the facility.

2.6.3 Groundwater Levels

33. p. 2-22: A map showing the locations of existing wells should be provided in this section. If the map is included in another section, provide a reference. In general, the workplan must contain more information about well locations, depth, construction, etc.

2.6.4 Field QA/QC Samples

34. p. 2-22: The term "distilled water" is used in the definitions of Trip Blanks and Equipment Blanks. Distilled water should be defined in the workplan. The EPA Environmental Services Division (ESD) recommends using organic-free water, as defined in Appendix B, Section B.1.2 of the SOPQAM, for preparation of trip blanks and equipment blanks.
35. p. 2-22: The workplan states equipment blanks will be collected in "appropriately preserved bottles". ESD recommends field preservation of water samples, including equipment blanks, to insure adequate preservation of samples. Litmus paper should be used to check the pH of all preserved water samples, in one of two ways:
- 1) a small amount of the sample should be poured over the litmus paper, or
 - 2) a small amount of the sample can be poured into another container and the paper placed in the alternate container.

The litmus paper should never be placed directly in the sample container to check the pH.

36. p.2-22: A detailed description of how duplicate samples will be collected should be included in the workplan. The number of duplicate samples and other QA/QC samples (if not already listed) to be collected should be specified in the workplan.

2.6.5 Sample Containers, Preparation, Chain-of-Custody and Laboratory Analysis

37. p. 2-23: The list of analytes should be for all compounds used at facility, not just those VOC's previously detected in groundwater.
38. p. 2-25, Table 2-3: The RFI workplan indicates that two 4-oz. wide-mouth glass jars with Teflon liners will be used to collect soil samples for VOC analysis. However, the EPA SOPQAM specifies the use of two 2-oz. VOA containers with Teflon-lined, septum sealed caps. Correct the container listing in Table 2-3.
39. p. 2-25, Table 2-3: The RFI workplan indicates that preservation of the aqueous trip blank will consist of cooling to 4°C and that the trip blank will have a 14-day holding time. This is incorrect. The 14-day holding time applies only if HCl is used as a preservative. If no preservative is used, the holding time is reduced to 7 days. Table 2-3 must be revised to show either HCl used as a preservative in the trip blank, or a trip blank holding time of 7 days.
40. p. 2-25, Table 2-3: HCL should be HCl.
41. p. 2-25, Table 2-3: The trip blank should be preserved with HCl to a pH < 2.0.
42. p. 2-25, Table 2-3: Both the equipment rinsate and TB samples should be placed in containers with Teflon-lined caps.

43. p. 2-27, Table 2-4; Footnote (1) is a reference to SW-846. SW-846 is revised and updated periodically. For any method which has been revised, the most recent version should be used. The reference should acknowledge prospective revisions.

4.0 PROJECT MANAGEMENT PLAN

4.2 Schedule

44. p. 4-1: The workplan differentiates between submission of a draft and final RFI report. In one respect an RFI report could be considered a draft until it is approved; however, the RFI report must be in final form the first time it is submitted.

APPENDIX B

45. SOP 1, p. B-1: This SOP should be changed to state that samples will be homogenized prior to placement in sample containers, exempting those samples collected for volatile organic compound (VOC) analyses.
46. SOP 2, p. B-5; References consist of a reference to SW-846. The reference should acknowledge prospective revisions to SW-846. Please refer to comment number 43.
47. SOP 3, p. B-6: The decontamination procedures discussed in this SOP should be changed to correspond with the procedures in Section B.8.3 of the SOPQAM. Step 5 should be eliminated. Decon water should be sampled to determine if hazardous constituents are present at elevated levels prior to disposal.
48. SOP 4, p. B-7: ESD recommends custody seals be placed on individual sample containers when they are shipped to the laboratory via common carrier. If the cooler were opened during shipment and the sample containers were not sealed, custody of the samples would be breached and the analytical results would be considered questionable.

49. SOP 4, p. B-7: Sample containers should be placed in individual plastic bags and sealed (ziploc bags will suffice). This prevents cross contamination of the samples, if a sample bottle breaks or leaks during shipment.
50. SOP 4, p. B-7: ESD recommends placing a large plastic garbage bag in the cooler prior to placing the sample containers in the cooler. An insulating material such as vermiculite should be used to help maintain the temperature of the samples during shipment. Refer to Appendix C of the SOPQAM for a detailed description of ESD's recommended shipping procedures.
51. SOP 6, p. B-18: Step 3 under the "Preliminary to Operation" procedure states: the tape of the water level indicator will be cleaned by wiping it and/or rinsing with tap water as necessary to remove any dirt. ESD recommends cleaning the water level indicator tape with a phosphate-free detergent such as liquinox and deionized water and rinsing it with deionized water.

Certified Mail Receipt # Z 436 760 328

August 11, 1995

Mr. John H. Hankinson
Regional Administrator
United States Environmental Protection Agency
Region IV
345 Courtland Street, NE
Atlanta, GA 30365

D.E.P.
AUG 15 1995
SOUTHWEST DISTRICT
TAMPA

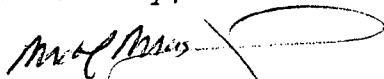
RE: Class 1 Permit Modification Submitted on August 8, 1995
Laidlaw Environmental Services of Bartow, Inc.
EPA ID # FLD 980 729 610

Dear Mr. Hankinson:

On August 8, 1995, Laidlaw Environmental Services of Bartow, Inc. submitted a permit modification for the 65 new waste codes which are known as the carbamate wastes. The submittal included an amended Part A. On page 7 of 7, the signature of one of the owners was omitted. Enclosed is a revised page 7 of 7 with all the appropriate signatures. Please replace the page 7 of 7 submitted to your office on August 8, 1995 with the enclosed, revised page.

We apologize for any inconvenience this may have caused. Should you have any questions or need further information concerning this matter, please contact myself or Mark Behel at 941-533-6111.

Sincerely,



Michael Merashoff
Facility Manager

Enclosure:

pc: Ashley Chadwick
Mark Behel
E. Lin Longshore
Richard Garrity, Ph.D - FDEP, Tampa District
Satish Kastury, - FDEP, Tallahassee Office

EPA I.D. Number (Enter from page 1)	Section	ID Number (Enter from page 1)
FLD980729610	3	

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature <i>Cynthia L. Barrow</i>	Date Signed 8.11.95
Name and Official Title (Type or print) CYNTHIA L. BARROW, EXECUTIVE DIRECTOR	
Owner Signature <i>Michael Merashoff</i>	Date Signed 8/10/95
Name and Official Title (Type or print) MICHAEL MERASHOFF, FACILITY MGR	
Operator Signature <i>Michael Merashoff</i>	Date Signed 8/10/95
Name and Official Title (Type or print) MICHAEL MERASHOFF, FACILITY MGR	
Operator Signature	Date Signed
Name and Official Title (Type or print)	

XIX. Comments

XV., XVI., XVII. - Drawings and photographs from previous submittals are same

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

Certified Mail Receipt # Z 073 904 411

D.E.P.

May 10, 1995

MAY 15 1995

SOUTHWEST DISTRICT
TAMPA

Ms. Jan Martin
GA/FL Unit
RCRA Permitting Section
RCRA and Federal Facilities Branch
Waste Management Division
Region IV
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, GA 30365

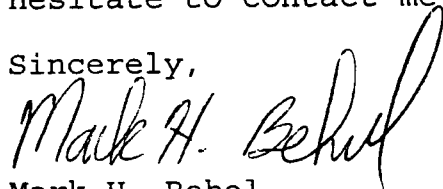
RE: Updated Equipment List
Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. # FLD 980 729 610

Dear Ms. Martin:

Enclosed is an updated equipment list (pumps and valves) for Laidlaw Environmental Services of Bartow, Inc. The only change is pump number 1025 has been changed from a centrifugal pump to an air pump.

If you have questions or need additional information please do not hesitate to contact me at 813-533-6111.

Sincerely,



Mark H. Behel
Safety and Compliance Manager

Enclosure:

pc: Mike Merashoff
Ashley Chadwick
E. Lin Longshore
Mr. Bill Crawford - FDEP, Tampa

8075	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8080	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8085	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8090	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8095	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8100	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8105	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8110	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8115	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8120	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8125	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8130	Valve	BV	2	T/P	Protatable Filter Bottom Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8131	Valve	BV	2	T/P	Filter Vent	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8135	Valve	BV	2	T/P	2" Steam Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8140	Valve	BV	3	T/P	3" Double Female Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8145	Valve	BV	3	T/P	3" Double Female Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8150	Valve	BV	3	T/P	3" Male to Female 1st Relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8151	Valve	BV	3	T/P	3" Male to Female 2nd Relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8155	Valve	BV	3	T/P	3" Air Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8160	Valve	BV	3	T/P	3" Air Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8165	Valve	BV	3	T/P	3" Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8170	Valve	BV	3	T/P	3" Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8175	Valve	BV	2	T/P	2" Outlet to Protatable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8180	Valve	BV	0.5	T/P	Air Bleed Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8185	Valve	BV	0.5	T/P	Pump Portable Discharge Bleed	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8190	Valve	BV	0.5	T/P	Air bleed for filter on portable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8200	Valve	BV	2	T/P	2" Female Air	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8205	Valve	BV	0.5	T/P	Portable Pump Filter Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8206	Valve	BV	0.5	T/P	2nd Pressure Relief Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8210	Valve	BV	0.5	T/P	Portable Pump Inlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8220	Valve	BV	1.5	T/P	1.5" Drain on portable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8221	Valve	BV	2	T/P	2" Male to 2" Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8225	Valve	BV	2	T/P	2" Male to 2" Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8230	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8235	Valve	BV	2	T/P	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8510	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8515	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8520	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
8525	Valve	BV	2	T/P	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7318	Valve	BV	0.5	T/P	Drain Valve #1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7319	Valve	BV	0.5	T/P	Drain Valve #2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7320	Valve	BV	3	T/P	Inlet Cutoff to 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7330	Valve	BV	0.5	T/P	Pressure Relief Basket Filter	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7340	Valve	BV	3	T/P	Portable Pump Inlet cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7350	Valve	BV	3	T/P	Portable Pump Outlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7355	Valve	BV	3	T/P	Pressure relief - 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7360	Valve	BV	3	T/P	Pressure relief - 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7365	Valve	BV	0.5	T/P	1st Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7370	Valve	BV	0.5	T/P	2nd Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7375	Valve	BV	0.5	T/P	2nd Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7385	Valve	BV	0.5	T/P	1st Pressure relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7390	Valve	BV	0.5	T/P	2nd Pressure relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7395	Valve	BV	2	T/P	Portable Pump Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7405	Valve	BV	2	T/P	Pump Discharge Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7410	Valve	BV	0.5	T/P	1st Drain Valve on Pump Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7415	Valve	BV	0.5	T/P	2nd Drain Valve on Pump Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7420	Valve	BV	0.5	T/P	Double Female Connector Drain #1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7425	Valve	BV	2	T/P	Portable Pump Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7430	Valve	BV	0.5	T/P	Portable Pump Inlet Drain Line #1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7435.5	Valve	CV	0.5	T/P	Portable Pump Inlet Drain Line, Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7440	Valve	BV	0.5	T/P	Portable Pump Inlet Drain Line #2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7450	Valve	BV	0.5	T/P	Portable Pump Outlet Drain Line valve #1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7455	Valve	BV	0.5	T/P	Portable Pump Outlet Drain Line valve #2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
PUMP LIST									
70	PUMP	DP	1 1/2	E	T-112 Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
135	PUMP	GP	3.0	E	T-111 Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
220	PUMP	GP	8	E	MM Grotator grinder pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
296	PUMP	DP	1.5	E	T-114 Diaphragm pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
330	PUMP	DP	1 1/2	E	DRM PMP Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
1025	PUMP	AP	1.5	D	BOTTOMS/recirculation pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
1215	PUMP	CP	2	D	REFLUX pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
1630	PUMP	CP	1.5 X 3.0	D	T-401 CINTRIFICAL pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
1715	PUMP	CP	1.5 X 3.0	D	Vac Still BOTTOMS pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
1825	PUMP	CP	1.5 X 3.0	D	R-101 pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
1820	PUMP	CP	1 X 2	D	R-102 Prod pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY
2015	PUMP	RP	2	D	TFE FEED pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY MONTHLY

Certified Mail Receipt # Z 073 904 413

March 22, 1995

Ms. Jan Martin
GA/FL Unit
RCRA Permitting Section
RCRA and Federal Facilities Branch
Waste Management Division
Region IV
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, GA 30365

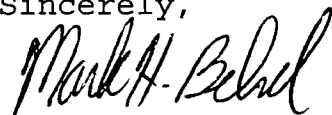
RE: Updated Equipment List
Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. # FLD 980 729 610

Dear Ms. Martin:

On March 14, 1995, Laidlaw Environmental Services of Bartow, Inc. (LESB) submitted to you a response to Mr. Alan Farmer's letter dated January 20, 1995. Included in the response was an equipment list. That list has been updated. Enclosed is the updated list which should supersede the one submitted on March 14, 1995.

If you have questions or need additional information please do not hesitate to contact me at 813-533-6111.

Sincerely,



Mark H. Behel
Safety and Compliance Manager

Enclosure:

pc: Mike Merashoff
Ashley Chadwick
E. Lin Longshore
Mr. Bill Crawford - FDEP, Tampa

D.E.P.
MAR 27 1995
SOUTHWEST DISTRICT
TAMPA

LIDLAW ENVIRONMENTAL SERVICES OF BARTOW, INC.

EQUIPMENT LIST

EQUIPMENT ID#	EQUIPMENT CLASS	TYPE	SIZE	PROCESS AREA	LOCATION	SERVICE	CONC. TOT. ORGANICS	METHOD OF COMPLIANCE	INSPECTION REQUIREMENT	MONITORING REQUIREMENT
2	Valve	BV	1	E	VAPOR BALANCE SYSTEM NORTH OF FUEL BLEND AREA	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
5	Valve	BV	6	E	T-112 side out pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
7	Valve	CV	1	E	CHECK VALVE ON AIR LINE	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
10	Valve	CV	1	E	T-112 side out air	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
25	Valve	BV	6	E	3" cuoff to portable I/O 2" hose conn.	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
30	Valve	BV	6	E	T-112 3" air bleed # 1	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
35	Valve	BV	3/4	E	T-112 3" air bleed # 2	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
45	Valve	BV	3	E	T-112 Line out post pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
50	Valve	BV	3	E	T-112 DP Inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
55	Valve	BV	3	E	T-112 Basket filter	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
60	Valve	BV	1/2	E	T-112 Bkt filter pres relf	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
61	Valve	BV	1/2	E	T-112 Basket filter pres relf	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
65	Valve	BV	3	E	T-112 DP Inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
75	Valve	BV	1 1/2	E	T-112 DP discharge cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
80	Valve	BV	3/4	E	T-112 DP dis side air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
85	Valve	CV	1	E	T-112 DP dis side air CV	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
90	Valve	BV	2	E	T-112 DP dis line I/O pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
95	Valve	BV	3	E	T-112 Bot tank drain Val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
140	Valve	BV	3	E	T-111 Gear pump dis cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
145	Valve	BV	3	E	T-111 Dis cutoff non exp pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
150	Valve	BV	3	E	T-111 Bottom tank drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
155	Valve	BV	3	E	MM Tank drn line to load S	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
160	Valve	BV	3/4	E	MM Air line tank drn S	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
165	Valve	BV	1	E	MM Air line drn upper N	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
170	Valve	BV	3	E	MM Air line drn lower N	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
175	Valve	BV	3	E	MM Tank drn line drums	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
180	Valve	BV	2	E	MM Bot tank port pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
185	Valve	CV	1	E	MM Bot tank air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
190	Valve	BV	6	E	MM side out pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
205	Valve	BV	6	E	MM Gorator Inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
210	Valve	BV	2	E	MM Side out pmp drn & port pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
215	Valve	BV	1	E	MM Gorator Inlet air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
225	Valve	BV	4	E	MM Gorator dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
230	Valve	BV	1	E	MM Gorator dischg air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
235	Valve	BV	4	E	MM Cut fr Gor to Muff M	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
240	Valve	BV	4	E	MM Cut fr Gor to T-112 & 4	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
245	Valve	BV	2	E	T-114 Blend line to T-114	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
247	Valve	BV	2	E	Top of T-114 Blend Line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
250	Valve	BV	2	E	MM Blend line to Muf M	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
255	Valve	BV	4	E	MM Cut fr Gor to T-114	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
260	Valve	BV	4	E	MM Cut fr Gor to T-112	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
262	Valve	BV	6	E	T-114 BOTTOM OF TANK DRAIN	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
267	Valve	BV	2	E	T-114 Side outlet pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
270	Valve	BV	1	E	T-114 Side out to pump I/O 2" hose	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
280	Valve	BV	1	E	T-114 Filter Inlet drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
280.5	Valve	BV	1	E	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
281	Valve	BV	1	E	Second valve; T-114 Filter Inlet drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
282	Valve	BV	3	E	T-114 BASKET FILET INLET CUTOFF	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
285	Valve	BF	1 1/2	E	T-114 Basket Filter	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
290	Valve	BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
291	Valve	BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
293	Valve	BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
295	Valve	BV	1/2	E	T-114 Filter outlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
305	Valve	BV	3	E	T-114 DP dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
310	Valve	CV	1	E	T-114 DP dischg cutoff airline	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
320	Valve	BV	1/2	E	DRM PMP Filter Pres relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
321	Valve	BV	1/2	E	DRM PMP Filter Pres relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
325	Valve	BV	2	E	DRM PMP DP Inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
335	Valve	BV	2	E	DRM PMP DP dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
340	Valve	BV	1	E	DRM PMP DP dischg line drn	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
345	Valve	BV	1	E	DRM PMP DP dis air line H/U W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
367	Valve	BV	2	E	HOSE con trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
370	Valve	BV	3	E	DRM PMP Dis 3" C/O to Trs(UNE)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
372	Valve	BV	2	E	HOSE con trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
375	Valve	BV	2	E	UPPER NE drum pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
380	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
382	Valve	BV	3	E	W HOSE con truck loading frm fuel blend	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
385	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
387	Valve	BV	3	E	E HOSE con truck loading frm fuel blend	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
390	Valve	BV	3	E	UPPER NE fr T-114 to Trk Load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
395	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY

400	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
405	Valve	BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
410	Valve	BV	4	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
415	Valve	BV	4	E	UPPER NE fr Gor to T-112	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
420	Valve	BV	3	E	UPPER SE fr T-111 to T-112	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
425	Valve	BV	2	E	UPPER SE T-112 blend line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
430	Valve	BV	2	E	UPPER SE MM/T-114 blend line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
435	Valve	BV	2	E	UPPER SE T-111 blend line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
440	Valve	CV	3	E	UPPER SE T-111 dischg line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
445	Valve	BV	2	E	UPPER SE T-111 dischg line cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1010	Valve	BV	4	D	BOTTOM outlet to pmp cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1015	Valve	BV	1	D	BOTTOM outlet to pmp cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1015.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1017	Valve	BV	1	D	Bottoms Outlet Ait/Drain 2nd Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1030	Valve	BV	2	D	RECIR line cutoff(bot)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1035	Valve	BV	1	D	RECIR line drain	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1045	Valve	CV	3	D	BOTTOMS line pmp dis	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1050	Valve	BV	1	D	BOTTOMS line pmp bleed/air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1051	Valve	BV	1	D	2nd Valve Drain line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1051.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1055	Valve	BV	1/2	D	BOTTOMS pump gauge cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1060	Valve	BV	1/2	D	BOTTOMS pump gauge drain	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1065	Valve	BV	3	D	BOTTOMS pump dis to cool cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1070	Valve	BV	1	D	BOTTOMS Inlet to H-305 air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1070.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1075	Valve	GV	3/4	D	H-305 cool prod drn line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1080	Valve	BV	3	D	H-305 cool outlet cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1085	Valve	BV	2	D	H-305 dis line-in trans E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1090	Valve	BV	1 1/2	D	SIDE out to sight glass	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1095	Valve	BV	1 1/2	D	SIGHT glass drain	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1100	Valve	GV	3/4	D	SIGHT glass tube valve bottom 1st	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1105	Valve	GV	3/4	D	SIGHT glass tube valve 2nd up	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1110	Valve	GV	3/4	D	SIGHT glass tube valve 3rd up	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1115	Valve	GV	3/4	D	SIGHT glass tube valve 4th up	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1135	Valve	BV	1	D	TOP pressure gauge cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1140	Valve	BV	1	D	BOTTOM col return - S-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1141	Valve	BV	1	D	2nd Drain Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1145	Valve	BV	1	D	BOTTOM col return S-302 drn In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1150	Valve	BV	1	D	BOTTOM col return S-302 drn In at S-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1151	Valve	BV	1	D	BOTTOM col return S-302 drn In at S-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1155	Valve	BV	1	D	S-302 side out sample line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1156	Valve	BV	1	D	S-302 side out sample line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1180	Valve	PSV	8	D	S-302 vapor PSV (vents-R-303)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1185	Valve	PSV	3	D	COL prod vapor (vents-R-303)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1170	Valve	BV	1/2	D	COL out to pres switch W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1175	Valve	BV	1/2	D	COL out to pres switch E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1180	Valve	CV	1	D	VAC relief val top F-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1185	Valve	BV	1/2	D	SIDE out top col ladder	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1180	Valve	BV	1/2	D	SIDE out near top col	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1185	Valve	BV	1/2	D	SIDE out 1/3 down top col	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1200	Valve	BV	1	D	BOTTOM tank drn line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1205	Valve	BV	2	D	TO reflux pmp cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1210	Valve	BV	1	D	REFLUX pmp in air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1220	Valve	BV	1	D	REFLUX pmp dis to gauge & smpl In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1225	Valve	BV	1 1/2	D	REFLUX PUMP TO PORTPMP/DR CON	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1230	Valve	BV	1/2	D	REFLUX PMP DIS SAMPLE LINE	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1235	Valve	BV	1 1/2	D	REFLUX pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1240	Valve	CV	1 1/2	D	REFLUX pmp dis in to prod	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1245	Valve	BV	1	D	FLOW meter(prod) In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1250	Valve	BV	1	D	FLOW meter(prod) In drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1255	Valve	BV	1	D	FLOW meter(prod) B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1260	Valve	BV	1	D	FLOW meter(prod) out drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1265	Valve	BV	1	D	FLOW meter(prod) out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1275	Valve	BV	1	D	COL prod out to air contrl val in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1280	Valve	BV	1	D	COL prod out to air contrl valve in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1285	Valve	BV	1	D	COL PRODLIN AIRCON VBP	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1288	Valve	BV	1	D	COL PRODLIN BP GAUGE LINE	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1290	Valve	BV	3/4	D	PROD In air val dis drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1290.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1291	Valve	BV	3/4	D	PROD In air val dis drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1295	Valve	BV	1	D	PROD In air contrl val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1300	Valve	BV	1	D	PROD In air contrl val dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1305	Valve	AV	1 1/2	D	PROD In to trans stat cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1310	Valve	BV	2	D	PROD In hose con in trans E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1315	Valve	BV	1 1/2	D	PROD In return to S-302 (low)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

1320	Valve	BV	1 1/2	D	PROD In return to S-302 (up)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1325	Valve	BV	2	D	FILL In cut at tank (up)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1327	Valve	BV	2	D	Bottom of Tank Drain	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1330	Valve	BV	2	D	FILL in con In trans E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1331	Valve	BV	2	D	Feed Filter Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1332	Valve	BV	1	D	Feed Filter Inlet Drain # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1332.1	Valve	BV	1	D	Feed Filter Inlet Drain # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1332.5	Valve	BV	1	D	Feed Filter Inlet Nitrogen Connection	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1333	Valve	BV	1	D	Feed Filter Outlet Drain # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1333.1	Valve	BV	1	D	Feed Filter Outlet Drain # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1334	Valve	BV	2	D	Feed Filter Outlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1335	Valve	BV	1 1/2	D	REFLUX pmp dis In to col top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1340	Valve	BV	1 1/2	D	REFLUX pmp dis In to CKV B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1345	Valve	CV	1	D	REFLUX pmp dis In to drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1350	Valve	BV	1 1/2	D	REFLUX pmp dis In to contrl val In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1355	Valve	BV	1 1/2	D	REFLUX pmp dis In to contrl val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1360	Valve	BV	1 1/2	D	REFLUX pmp dis In to contrl val out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1365	Valve	BV	1 1/2	D	REFLUX pmp dis In to contrl val B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1370	Valve	BV	1	D	REFLUX flow meter in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1375	Valve	BV	1	D	REFLUX flowmeter in drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1380	Valve	BV	1	D	REFLUX flowmeter B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1385	Valve	BV	1	D	REFLUX flowmeter out drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1390	Valve	BV	1	D	REFLUX flowmeter out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1395	Valve	BV	1/2	D	REFLUX In to top col/gauge In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1400	Valve	GV	1	D	BOTTOM sightglass val R-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1405	Valve	GV	1	D	TOP sightglass val R-302	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1415	Valve	GV	1	D	R-302 vent line to chiller	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1600	Valve	BV	3	D	BOTTOM tank out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1605	Valve	BV	3	D	BOTTOM tank recirc water cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1610	Valve	BV	3	D	SIDE out to pmp top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1615	Valve	BV	3	D	SIDE out to pmp middle	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1620	Valve	BV	1	D	PUMP in basket filter drn In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1625	Valve	GV	1	D	PUMP In drn In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1635	Valve	CV	3	D	PUMP dis line	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1640	Valve	BV	1/2	D	PUMP dis gauge/sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1645	Valve	BV	1/2	D	PUMP dis sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1650	Valve	BV	1	D	PUMP dis air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1650.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1655	Valve	BV	3	D	PUMP dis to In recirc In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1660	Valve	BV	3	D	PUMP dis to trans cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1665	Valve	BV	2	D	PUMP dis con trans E	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1670	Valve	BV	2	D	INLET feed In to tank top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1675	Valve	BV	1	D	SIDE out sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1676	Valve	BV	1	D	SIDE out sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1680	Valve	GV	3/4	D	SIGHT glass val (bottom)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1685	Valve	GV	3/4	D	SIGHT glass val (top)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1690	Valve	GV	3	D	BOTTOM tank In/out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1695	Valve	BV	1	D	BOTTOM tank In/out cut air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1695.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1696	Valve	BV	1	D	BOTTOM tank In/out cut air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1700	Valve	GV	3	D	BOTTOMS pmp In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1705	Valve	BV	1	D	BOTTOMS pmp In filter drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1710	Valve	GV	1	D	BOTTOMS pmp In In drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1720	Valve	CV	3	D	BOTTOMS pmp dis check val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1725	Valve	GV	1/2	D	BOTTOMS pmp dis In to gauge/sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1730	Valve	GV	1/2	D	BOTTOMS pmp dis In to sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1735	Valve	GV	3/4	D	BOTTOMS pmp dis In drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1740	Valve	BV	1	D	BOTTOMS pmp dis air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1741	Valve	BV	1	D	BOTTOMS pmp dis air con, 2nd valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1745	Valve	BV	3	D	BOTTOMS pmp return tank	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1746	Valve	CV	3	D	CHECK valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1750	Valve	GV	3	D	BOTTOMS pmp cut trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1755	Valve	BV	2	D	BOTTOMS pmp dis con trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1760	Valve	BV	2	D	FILL in con In trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1765	Valve	BV	1	D	SAMPLE val on manway cover	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1770	Valve	GV	3/4	D	SIGHT glass val bottom	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1771	Valve	BV	1	D	Sight Glass Drain (Bottom)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1772	Valve	BV	1	D	Sight Clean Out (Bottom)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1773	Valve	BV	1	D	Sight Clean Out (top)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1774	Valve	BV	1	D	Sight Clean Out (top)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1775	Valve	GV	3/4	D	SIGHT glass val top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1776	Valve	PSV	3	D	PRESS val top vac	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1777	Valve	GV	3/4	D	Vacuum Still PSV	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1778	Valve	GV	2	D	PROD return In from condenser to top vac	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1780	Valve	BV	3/4	D	SAMPLE/air con bot H-101 (top)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

1785	Valve	BV	3/4	D	SAMPLE/air con bot H-101 (bottom)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1790	Valve	GV	2	D	TOP In In to R-101	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1795	Valve	PSV	1	D	TOP R-101	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1798	Valve	PSV	1	D	TOP R-101	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1805	Valve	GV	1	D	DRAIN In from R-103 K/O pot	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1810	Valve	BV	1 1/2	D	R-101 bottom tank to pmp In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1815	Valve	CV	1 1/2	D	R-101 bottom tank to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1830	Valve	CV	2	D	R-101 pmp dis In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1835	Valve	GV	1/2	D	R-101 pmp dis In (sampl/gauge) In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1840	Valve	BV	1/2	D	R-101 pmp dis In sample In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1845	Valve	GV	1	D	R-101 pmp dis In air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1850	Valve	GV	1 1/2	D	R-101 pmp dis In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1855	Valve	BV	2	D	R-101 pmp dis In trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1860	Valve	GV	3/4	D	R-101 tank sightglass top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1865	Valve	GV	3/4	D	R-101 tank sightglass bottom	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1870	Valve	GV	1 1/2	D	R-102 tank In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1875	Valve	GV	1	D	R-102 tank vent cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1880	Valve	CV	1	D	R-102 top tank	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1885	Valve	GV	2	D	R-102 vac In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1890	Valve	GV	3/4	D	R-102 tank sightglass top	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1895	Valve	GV	3/4	D	R-102 tank sightglass bottom	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1900	Valve	GV	1	D	R-102 bottom tank drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1905	Valve	GV	2	D	R-102 Prod pmp In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1910	Valve	BV	1/2	D	R-102 Prod pmp In filter drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1910.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1925	Valve	CV	1 1/2	D	R-102 Prod pmp dis ck val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1930	Valve	BV	1	D	R-102 Prod pmp dis gauge cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1935	Valve	BV	1	D	R-102 Prod pmp dis sample In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1940	Valve	BV	1	D	R-102 Prod pmp dis drum hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1945	Valve	GV	1 1/2	D	R-102 Prod pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1950	Valve	GV	1 1/2	D	R-102 Prod pmp dis air convolve In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1955	Valve	AV	3/4	D	R-102 Prod pmp dis air con val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1960	Valve	GV	1 1/2	D	R-102 Prod pmp dis air contri val out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1965	Valve	GV	1	D	R-102 Prod pmp dis air contri val B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1970	Valve	BV	2	D	R-102 Prod pmp dis Trans con W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
1975	Valve	BV	2	D	TRANS feed In con W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2005	Valve	GV	2	D	FEED pmp B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2010	Valve	GV	2	D	FEED pmp In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2017	Valve	GV	1	D	FEED pmp steam conn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2020	Valve	GV	2	D	FEED pmp out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2022	Valve	GV	3	D	H-202 bottom receiver cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2025	Valve	GV	2	D	H-202 prod pmp In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2030	Valve	BV	1	D	H-202 prod pmp In drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2035	Valve	CV	2	D	H-202 prod pmp In chk val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2045	Valve	BV	1/2	D	H-202 prod pmp sample In 1st val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2050	Valve	BV	1/2	D	H-202 prod pmp sample In 2nd val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2055	Valve	CV	1 1/2	D	H-202 prod pmp dis chk val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2060	Valve	BV	1	D	H-202 prod pmp dis air In con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2060.5	Valve	BV	1	D	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2065	Valve	GV	1/4	D	H-202 prod pmp dis flowmtr con 1st	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2070	Valve	GV	1/4	D	H-202 prod pmp dis flowmtr con 2nd	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2075	Valve	BV	1/2	D	H-202 prod pmp TFE sightgl wash	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2080	Valve	BV	1/2	D	TFE sightglass wash In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2081	Valve	GV	1/4	D	Sight Glass Internal Wash Cutoff (East)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2082	Valve	GV	1/4	D	Sight Glass Internal Wash Cutoff (West)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2083	Valve	BV	1	D	Press Val Top TFE	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2085	Valve	BV	1 1/2	D	H-202 pmp air contri val In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2090	Valve	AV	1	D	H-202 pmp air contri val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2095	Valve	BV	1 1/2	D	H-202 pmp air contri val out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2100	Valve	BV	1	D	H-202 pmp air contri val B/P	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2105	Valve	BV	2	D	H-202 prod pmp trans con W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2110	Valve	BV	1 1/2	D	H-202 prod pmp R-210 overhd recv	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2120	Valve	GV	3/4	D	R-201 sightglass bot val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2125	Valve	GV	3/4	D	R-201 sightglass top val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2130	Valve	GV	1 1/2	D	R-201 bot out cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2142	Valve	BV	2	D	R-201 prod pmp wts hose conn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2145	Valve	GV	3/4	D	H-202 sightglass bottom val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2150	Valve	GV	3/4	D	H-202 sightglass top val	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2155	Valve	BV	1	D	VAC In cut R-202	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2160	Valve	BV	1/2	D	H-202 vac In gauge cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2162	Valve	BV	1/2	D	H-202 vac In gauge cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2165	Valve	GV	1	D	R-104 K/O pot bot tank drn	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2170	Valve	BV	2	D	R-104 out vac pmp	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2180	Valve	BV	3	D	BOTTOMS In cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2185	Valve	BV	1	D	BOTTOMS In steam in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

2180	Valve	BV	1	D	BOTTOMS In steam in drn	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2185	Valve	BV	3	D	BOTTOMS In, bots pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2186	Valve	BV	3	D	BOTTOMS In, bots pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2187	Valve	BV	2	D	TFE BOTTOMS PUMP INLET CUTOFF	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2202	Valve	BV	1	D	TFE BOTTOMS PUMP OUTLET DRAIN	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2204	Valve	BV	1.5	D	TFE BOTTOMS PUMP OUTLET CUTOFF	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2205	Valve	CV	3	D	BOTTOMS pmp dis chk val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2210	Valve	BV	2	D	BOTTOMS pmp dis hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2215	Valve	BV	2	D	BOTTOMS pmp dis R-201 cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2220	Valve	GV	3	D	BOTTOMS pmp dis trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2225	Valve	BV	2	D	BOTTOMS pmp dis trans con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2230	Valve	GV	3	D	BOTTOMS pmp dis R-2/R-3 cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2235	Valve	GV	1	D	BOTTOMS pmp dis steam in con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2240	Valve	CV	1	D	BOTTOMS pmp dis steam in con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2245	Valve	BV	3	D	BOTTOMS in trans W/fm trans W to R-2/R-3	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2250	Valve	BV	2	D	BOTTOMS in trans W/fm trans W to R-2/R-3 trans hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2255	Valve	BV	3	D	R-2 In In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2260	Valve	BV	3	D	R-3 In In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2265	Valve	BV	1/2	D	R-2 In In gauge cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2275	Valve	BV	3	D	SIGHT glass opening	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2280	Valve	RD	3	D	Pres relief disc	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2280	Valve	BV	1	D	VACUUM vent in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2300	Valve	BV	1/2	B	GAUGE In cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2305	Valve	RD	3	D	Pres relief disc	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2310	Valve	BV	3	B	SIGHT glass cover val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2315	Valve	GV	1	B	VACUUM/vent in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2325	Valve	GV	6	B	BOTTOM out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2330	Valve	GV	6	B	BOTTOM out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2335	Valve	BV	1	B	BOTTOMS pmp in drn in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2340	Valve	BV	3	B	BOTTOMS pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2345	Valve	BV	3	B	BOTTOMS pmp B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2355	Valve	BV	3	B	BOTTOMS pmp out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2360	Valve	BV	1	B	BOTTOMS pmp out air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2361	Valve	BV	1	B	BOTTOMS pmp out air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2365	Valve	BV	3	B	BOTTOMS pmp out hose con 3"	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2370	Valve	BV	3	B	BOTTOMS pmp out trans cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2375	Valve	BV	2	B	BOTTOMS pmp trans con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2380	Valve	BV	2	D	W trans In to E trans (S)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2385	Valve	BV	2	D	E trans from W trans (L) (N)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2390	Valve	BV	2	D	E trans to W trans (U) (S)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2395	Valve	BV	2	D	W trans In from E trans (N)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2500	Valve	BV	2	D	TFE vacuum system from R-204 top	Vapor	> 10 %	Vacuum	N/A	N/A
2505	Valve	AV	2	D	AUTO control valve	Vapor	> 10 %	Vacuum	N/A	N/A
2510	Valve	BV	2	D	AUTO valve bypass	Vapor	> 10 %	Vacuum	N/A	N/A
2515	Valve	BV	2	D	(useless valve)	Vapor	> 10 %	Vacuum	N/A	N/A
2520	Valve	BV	2	D	VENT cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2522	Valve	GV	2	VB	Vent bypass haz/nonhaz	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2523	Valve	BV	1	VB	Vent Sample Line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2524	Valve	BV	2	VB	Vent Cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2525	Valve	GV	2	D	PUMP Inlet cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2530	Valve	GV	1/2	D	PUMP Inlet gauge cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2540	Valve	BV	1	D	VACUUM pmp discharge drain	Vapor	> 10 %	Vacuum	N/A	N/A
2545	Valve	BV	2	D	VACUUM pmp water return cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2550	Valve	BV	2	D	VACUUM still vac sys from R-103 top	Vapor	> 10 %	Vacuum	N/A	N/A
2555	Valve	AV	2	D	AUTO control valve	Vapor	> 10 %	Vacuum	N/A	N/A
2560	Valve	BV	2	D	AUTO valve bypass	Vapor	> 10 %	Vacuum	N/A	N/A
2565	Valve	BV	2	D	(useless valve)	Vapor	> 10 %	Vacuum	N/A	N/A
2570	Valve	BV	2	D	VENT cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2571	Valve	BV	1	VB	Vent behind S-101, for drum loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2572	Valve	BV	1	VB	Vent Sample line on Vacuum Still	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2573	Valve	BV	2	VB	Vent Cutoff on Vacuum Still	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2574	Valve	GV	2	VB	Vent Cutoff on Vacuum Still second valve	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2575	Valve	GV	2	D	PUMP Inlet cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2580	Valve	GV	1	D	PUMP Inlet gauge cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2590	Valve	BV	1	D	VACUUM pmp discharge drain	Vapor	> 10 %	Vacuum	N/A	N/A
2595	Valve	BV	2	D	VACUUM pmp water return cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2600	Valve	BV	2	D	TFE vacuum still; vacuum pmp line cut off	Vapor	> 10 %	Vacuum	N/A	N/A
2700	Valve	GV	0.5	VB	Vent water resv. Top of sightglass	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2705	Valve	GV	0.5	VB	Vent water resv. Bottom of sightglass	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2710	Valve	BV	1/2	VB	Vent water resv. Bottom of sightglass drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2715	Valve	BV	1	VB	Water Inlet	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2725	Valve	BV	1/2	VB	Pump outlet Sample line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2727	Valve	BV	1/2	VB	Drain Sample Line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2728	Valve	BV	1	VB	2nd Water Feedline	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
2730	Valve	BV	1/2	VB	Pump Outlet guage cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY

2735	Valve	BV	1	VB	Vent water tank drainline	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2740	Valve	BV	1/2	VB	Press. switch cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2745	Valve	BV	2	VB	Auto air vent cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
2750	Valve	BV	1	VB	Vent for drum loading by west transfer station	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5000	Valve	BV	3	C	TOP In In crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5001	Valve	PRV	18	C	Top Of T-101	Vapor	>10%	Inspection/Monitoring	MONTHLY
5002	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-101	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5003	Valve	Btyfly	3	C	Vapor Balance Cutoff to Tank T-101	Vapor	>10%	Inspection/Monitoring	MONTHLY
5005	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5010	Valve	BV	2	C	In/out In top of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5015	Valve	BV	2	C	In/out In bot of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5020	Valve	GV	8	C	BOTTOM of cone out to pmp	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5025	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5030	Valve	BV	3	C	TOP In In at crude, trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5031	Valve	PRV	18	C	Top of crude tank T-102	Vapor	>10%	Inspection/Monitoring	MONTHLY
5032	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-102	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5033	Valve	Btyfly	3	C	Vapor Balance Cutoff to Tank T-102	Vapor	>10%	Inspection/Monitoring	MONTHLY
5035	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5040	Valve	BV	2	C	I/O In top cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5045	Valve	BV	2	C	I/O In bot of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5050	Valve	GV	8	C	BOTTOM of cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5052	Valve	BV	3	C	Second cutoff at Bottom of Cone	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5055	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5060	Valve	BV	3	C	TOP In In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5061	Valve	PRV	18	C	Top of crude tank T-103	Vapor	>10%	Inspection/Monitoring	MONTHLY
5062	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-103	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5063	Valve	Btyfly	3	C	Vapor Balance Cutoff to Tank T-103	Vapor	>10%	Inspection/Monitoring	MONTHLY
5065	Valve	BV	2	C	HOSE con I/O at top of tank	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5070	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5075	Valve	BV	2	C	I/O In top of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5080	Valve	BV	2	C	I/O In bot of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5085	Valve	GV	8	C	BOTTOM of cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5090	Valve	GV	8	C	BOTTOM cone clean out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5092	Valve	BV	3	C	Second Cutoff at Bottom of Cone on T-103	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5095	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5100	Valve	BV	3	C	TOP In In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5101	Valve	PRV	18	C	Top of crude tank T-104	Vapor	>10%	Inspection/Monitoring	MONTHLY
5102	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-104	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5103	Valve	Btyfly	3	C	Vapor Balance Cutoff to Tank T-104	Vapor	>10%	Inspection/Monitoring	MONTHLY
5105	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5110	Valve	BV	2	C	I/O In top of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5115	Valve	BV	3	C	I/O In bot cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5117	Valve	BV	3	C	2nd Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5120	Valve	GV	8	C	BOTTOM cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5125	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5130	Valve	BV	3	C	TOP In In at crude, trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5131	Valve	PRV	18	C	Top of crude tank T-105	Vapor	>10%	Inspection/Monitoring	MONTHLY
5132	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-105	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5133	Valve	Btyfly	3	C	Vapor Balance Cutoff to Tank T-105	Vapor	>10%	Inspection/Monitoring	MONTHLY
5135	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5140	Valve	BV	2	C	I/O In top of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5145	Valve	BV	2	C	I/O In bot of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5150	Valve	GV	8	C	BOTTOM of cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5152	Valve	BV	3	C	Second Cutoff at Bottom of Cone on T-105	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5155	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5160	Valve	BV	3	C	TOP In In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5161	Valve	PRV	18	C	Top of crude tank T-106	Vapor	>10%	Inspection/Monitoring	MONTHLY
5162	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-106	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5163	Valve	Btyfly	3	C	Vapor Balance Cutoff to Tank T-106	Vapor	>10%	Inspection/Monitoring	MONTHLY
5165	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5170	Valve	BV	2	C	I/O In top of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5175	Valve	BV	2	C	I/O In top of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5180	Valve	GV	8	C	BOTTOM cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5182	Valve	BV	3	C	Second Cutoff at Bottom of Cone on T-106	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5185	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5190	Valve	BV	3	C	TOP In In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5191	Valve	PRV	18	C	Top of crude tank T-107	Vapor	>10%	Inspection/Monitoring	MONTHLY
5192	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-107	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5193	Valve	Btyfly	3	C	Vapor Balance Cutoff to Tank T-107	Vapor	>10%	Inspection/Monitoring	MONTHLY
5195	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5200	Valve	BV	2	C	I/O In top cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5205	Valve	BV	2	C	I/O In bot cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5210	Valve	GV	8	C	BOTTOM cone out to pmp In	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5212	Valve	BV	3	C	Second Cutoff at Bottom of Cone on T-107	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5215	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

5220	Valve	BV	3	C	TOP In In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5221	Valve	PRV	18	C	Top of crude tank T-108	Vapor	>10%	Inspection/Monitoring	MONTHLY
5222	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-108	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5223	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-108	Vapor	>10%	Inspection/Monitoring	MONTHLY
5225	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5230	Valve	BV	2	C	I/O In top cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5235	Valve	BV	2	C	I/O In bot cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5240	Valve	GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5242	Valve	BV	3	C	Second Cutoff at Bottom of Cone T-108	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5245	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5250	Valve	BV	3	C	TOP In In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5251	Valve	PRV	18	C	Top of crude tank T-109	Vapor	>10%	Inspection/Monitoring	MONTHLY
5252	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-109	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5253	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-109	Vapor	>10%	Inspection/Monitoring	MONTHLY
5255	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5260	Valve	BV	2	C	I/O In top cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5265	Valve	BV	2	C	I/O In bot cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5270	Valve	GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5272	Valve	BV	3	C	Second Cutoff Valve At Bottom Of Cone T-109	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5275	Valve	BV	2	C	MID con out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5280	Valve	BV	3	C	TOP In In at crude trk load	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5281	Valve	PRV	18	C	Top of crude tank T-110	Vapor	>10%	Inspection/Monitoring	MONTHLY
5282	Valve	BV	4	C	Top of Tank Sample Valve, Tank T-110	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5283	Valve	Bytfly	3	C	Vapor Balance Cutoff to Tank T-110	Vapor	>10%	Inspection/Monitoring	MONTHLY
5285	Valve	BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5290	Valve	BV	2	C	I/O In top cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5295	Valve	BV	2	C	I/O In bot cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5300	Valve	GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5302	Valve	BV	3	C	Second Cutoff Valve At Bottom Of Cone T-110	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5305	Valve	BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5310	Valve	BV	3	C	T-105-T-109 Isolation val, under T-110 bots in to pmp	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5315	Valve	BV	3	C	T-105-T-110 cut, in to trans in (T-110 side)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5320	Valve	BV	3	C	T-101-T-105 cut, in to trans in (T-105 side)	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5325	Valve	CV	1	C	AIR con in to 100s/trans in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5330	Valve	BV	1	C	AIR con in to 100s/trans in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5375.5	Valve	BV	1	C	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5335	Valve	BV	2	C	HOSE con cut 100 - trans W in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5337	Valve	BV	2	C	HOSE connection	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5355	Valve	BV	2	C	T00 trans W cut b/w T-110/T-109	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5360	Valve	BV	1	C	T00 trans W cut b/w T-110/T-109 drn in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5365	Valve	BV	2	C	TRANS W hose con frm T-100s bot	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5370	Valve	BV	3	C	TO crude pmp cut, b/w T-102 & T-103	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5375	Valve	BV	3/4	C	CRUDE pmp in drn/air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5375.5	Valve	BV	1	C	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5378	Valve	BV	3/4	C	CRUDE pmp in drn/air con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5380	Valve	BV	3	C	CRUDE in to dycon pmp b/w T-107 & 8	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5385	Valve	GV	3	C	CRUDE in to dycon, hose con N side dycon	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5390	Valve	BV	3	C	DYCON pmp in cut frm 100 tks	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5395	Valve	GV	3	C	CRUDE in to dycon, hose con S side of dycon	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5405	Valve	BV	3/4	C	DYCON pmp dis drn/air	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5406	Valve	BV	3/4	C	DYCON pmp dis drn/air	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5410	Valve	BV	3	C	DYCON pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5415	Valve	BV	1/2	C	CRUDE tks gear pmp filter in drn in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5415.5	Valve	BV	1	C	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5418	Valve	BV	1/2	C	CRUDE tks gear pmp filter in drn in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5422	Valve	BV	3/4	C	Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5430	Valve	BV	3	C	TRUCK load gear pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5435	Valve	BV	3	C	TRANS in frm crude trk load to trans W	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5440	Valve	BV	2	C	TRANS in frm crude trk load to trans W hose con	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5445	Valve	BV	2	C	OUT in trans W to T-105 in for Fuel Blend pmp under T-110	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5450	Valve	BV	2	C	FUEL blend pmp in cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5465	Valve	CV	1	C	FUEL blend pmp dis in	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5470	Valve	BV	2	C	FUEL blend pmp dis cut	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5500	Valve	BV	3	VB	On jib crane in front of T-103	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5505	Valve	BV	1	VB	On jib crane east of T-100 tanks	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5505.5	Valve	BV	1	C	Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5510	Valve	BV	1	VB	Vapor balance system by T-110	Vapor	> 10 %	Inspection/Monitoring	MONTHLY
5520	Valve	BV	1	C	Truck Loading Centrifugal Pump Inlet Drain # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5525	Valve	BV	1	C	Truck Loading Centrifugal Pump Inlet Drain # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5530	Valve	BV	3	C	Truck Loading Centrifugal Pump Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5535	Valve	BV	1	C	Filter Pressure Relief # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5536	Valve	BV	1/2	C	Filter Pressure Relief # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5540	Valve	BV	1	C	Filter Outlet Drain # 1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5545	Valve	BV	1	C	Filter Outlet Drain # 2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5550	Valve	BV	1	C	Truck Loading Centrifugal Pump/Filter outlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

5800	Valve	BV	2	VB	On Crane In Front Of T-103	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5805	Valve	BV	2	VB	On Crane In Field East of T-100 Tanks	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
5810	Valve	BV	1	VB	Vapor Balance System By T-110	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6000	Valve	BV	0.5	TF	3" Hose Conn - Double female - Double valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6005	Valve	BV	0.5	TF	3" Hose Conn - Double female - Double valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6010	Valve	BV	0.5	TF	3" Hose Conn - Double female - Double valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6015	Valve	BV	0.5	TF	3" - 2" Female to Male reducer	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6020	Valve	BV	0.5	TF	3" - 2" Female to Male reducer	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6025	Valve	BV	0.5	TF	Drum Filling Hose	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6035	Valve	BV	0.5	TF	Diaphragm Pump Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6045	Valve	BV	0.5	TF	Diaphragm Pump Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6050	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6055	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6060	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6065	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6070	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6075	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6080	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6085	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6090	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6095	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6100	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6105	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6110	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6115	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6120	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6125	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6130	Valve	BV	2	TF	Portable Filter Bottom Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6131	Valve	BV	2	TF	Filter Vent	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6135	Valve	BV	2	TF	2" Steam Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6140	Valve	BV	3	TF	3" Double Female Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6145	Valve	BV	3	TF	3" Double Female Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6150	Valve	BV	3	TF	3" Male to Female 1st Relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6151	Valve	BV	3	TF	3" Male to Female 2nd Relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6155	Valve	BV	3	TF	3" Air Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6160	Valve	BV	3	TF	3" Air Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6165	Valve	BV	3	TF	3" Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6170	Valve	BV	3	TF	3" Female to Male	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6175	Valve	BV	2	TF	2" Outlet to Portable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6180	Valve	BV	0.5	TF	Air Bleed Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6185	Valve	BV	0.5	TF	Pump Portable Discharge Bleed	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6190	Valve	BV	0.5	TF	Air bleed for filter on portable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6200	Valve	BV	2	TF	2" Female Air	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6205	Valve	BV	0.5	TF	Portable Pump Filter Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6206	Valve	BV	0.5	TF	2nd Pressure Relief Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6210	Valve	BV	0.5	TF	Portable Pump Inlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6220	Valve	BV	1.5	TF	1.5" Drain on portable pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6221	Valve	BV	2	TF	2" Male to 2" Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6225	Valve	BV	2	TF	2" Male to 2" Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6230	Valve	BV	2	TF	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6235	Valve	BV	2	TF	2" Double Female - Double Valve	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6510	Valve	BV	2	TF	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6515	Valve	BV	2	TF	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6520	Valve	BV	2	TF	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
6525	Valve	BV	2	TF	2" Double Female	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7318	Valve	BV	0.5	TF	Drain Valve #1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7319	Valve	BV	0.5	TF	Drain Valve #2	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7320	Valve	BV	3	TF	Inlet Cutoff to 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7330	Valve	BV	0.5	TF	Pressure Relief Basket Filter	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7340	Valve	BV	3	TF	Portable Pump Inlet cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7350	Valve	BV	3	TF	Portable Pump Outlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7355	Valve	BV	3	TF	Pressure relief - 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7360	Valve	BV	3	TF	Pressure relief - 3" Portable Pump	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7365	Valve	BV	0.5	TF	1st Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7370	Valve	BV	0.5	TF	2nd Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7375	Valve	BV	0.5	TF	2nd Pressure relief outlet	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7385	Valve	BV	0.5	TF	1st Pressure relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7390	Valve	BV	0.5	TF	2nd Pressure relief	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7395	Valve	BV	2	TF	Portable Pump Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7405	Valve	BV	2	TF	Pump Discharge Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7410	Valve	BV	0.5	TF	1st Drain Valve on Pump Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7415	Valve	BV	0.5	TF	2nd Drain Valve on Pump Discharge	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7420	Valve	BV	0.5	TF	Double Female Connector Drain #1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7425	Valve	BV	2	TF	Portable Pump Inlet Cutoff	Liquid	> 10 %	Inspection/Monitoring	MONTHLY
7430	Valve	BV	0.5	TF	Portable Pump Inlet Drain Line #1	Liquid	> 10 %	Inspection/Monitoring	MONTHLY

7435.5	Valve	CV	0.5	T/P	Portable Pump Inlet Drain Line, Nitrogen Fitting	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
7440	Valve	BV	0.5	T/P	Portable Pump Inlet Drain Line #2	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
7450	Valve	BV	0.5	T/P	Portable Pump Outlet Drain Line valve #1	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
7455	Valve	BV	0.5	T/P	Portable Pump Outlet Drain Line valve #2	Liquid	> 10 %	Inspection/Monitoring		MONTHLY
=====										
70	PUMP	DP	1.5	E	T-112 Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
135	PUMP	GP	3.0	E	T-111 Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
220	PUMP	GP	6	E	MM Gorator grinder pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
298	PUMP	DP	1.5	E	T-114 Diaphragm pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
330	PUMP	DP	1.5	E	DRM PMP Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
1025	PUMP	CP	1.5 X 3.0	D	BOTTOMS/recirculation pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
1215	PUMP	CP	2	D	REFLUX pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
1630	PUMP	CP	1.5 X 3.0	D	T-401 CINTRIFICAL pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
1715	PUMP	CP	1.5 X 3.0	D	Vac Still pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
2015	PUMP	RP	2	D	TFE FEED pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
2200	PUMP	DP	1.5	D	TFE BOTTOMS PUMP	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
5400	PUMP	DP	3	C	CRUDE tank dycon pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
5425	PUMP	GP	3	C	TRUCK load gear pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
5460	PUMP	CP	1.5 X 1	C	FUEL blend pmp (under T-110)	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
5515	PUMP	CP	3	C	Truck Loading Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
6030	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
6195	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
6215	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
7345	Pump	DP	3	T/P	Portable Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
7400	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY
7445	PUMP	DP	1.5	T/P	Portable Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JAN 20 1995

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JAN 25 1995

Department of Environmental Protection
SOUTHWEST DISTRICT

BY _____

4WD-RCRA

Mr. Mark H. Behel
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

SUBJ: Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. No. FLD 980 729 610

Dear Mr. Behel:

This letter is in response to your September 1, 1994, letter which requested a Class I Permit Modification to the HSWA Portion of the RCRA Permit (Permit) issued on December 5, 1991, to Laidlaw Environmental Services of Bartow, Inc. Three potential permit modifications were addressed in that letter.

Modification of Permit Section V.C.1.

In regard to modification of Section V.C.1. of the Permit, valves in light liquid service are governed by 40 CFR §264.1057(b)-(e) unless they are covered under 40 CFR §264.1057(f), (g) or (h). The wording of the permit provision is determined by the applicable regulation. Please specify the applicable CFR section for the valves listed in Attachment 1.

Were there any valves in heavy liquid service at the facility when the Permit was issued? Are there currently any valves in heavy liquid service at the facility?

Modification of Permit Attachment 1 Without Permit Modification

The requested modification was removal of the equipment list from Permit Attachment 1. As described in the letter, the list would be maintained at the facility and provided to EPA upon request. The equipment list would be updated without modification of the permit.

It will not be possible to remove the equipment list from the permit and change it without modification of the Permit. The principal reasons are:

1. It is important to maintain a complete and up-to-date permit at the facility for any compliance officer performing an

inspection. The equipment list and Permit Attachment 1 are referred to throughout Part V of the Permit.

2. Equipment replacement or upgrading with functionally equivalent components is considered to be a Class 1 permit modification, see Appendix 1 to 40 CFR §270.42 -- Classification of Permit Modification. Updating equipment is considered a Class 1 modification.

40 CFR §270.42(a) specifies a procedure to be followed for Class 1 permit modifications. The procedure is simplified when prior Director approval is not required. Many Class 1 modifications do not require prior Director approval.

Planned Addition of HCFC Still

40 CFR §264.1030 addresses the applicability of Subpart AA and 40 CFR §264.1050 addresses the applicability of Subpart BB to owners and operators of facilities that treat, store or dispose of hazardous waste.

Your letter states the HCFC system will not have a process vent because it is a closed system. If it is a closed-vent system, does it have a control device and is it regulated under 40 CFR §264.1032 (b)? The rules for process vents contain requirements that specific control device operating parameters be monitored. See Hazardous Waste TSDF - Technical Guidance Document for RCRA Air Emission Standards for Process Vents and Equipment Leaks.

If 40 CFR §264.1032 (b) applies to the HCFC system, the requirements of 40 CFR §264.1033 must be met and the information specified in 40 CFR §270.24 must be provided.

Equipment leak standards apply to emissions from valves, pumps, compressors, pressure relief devices, sampling connection systems and open-ended valves or lines where the equipment comes in contact with hazardous waste streams with 10 percent (by weight) or greater total organic content. See Hazardous Waste TSDF - Technical Guidance Document for RCRA Air Emission Standards for Process Vents and Equipment Leaks.

The permit information requirements, for equipment to which 40 CFR §264, Subpart BB applies, are specified in 40 CFR §270.25.

Part 264, Subparts AA, BB and CC

Florida is now authorized to enforce the organic air emission standards for process vents and equipment leaks. Florida's authorization for Parts 264 and 265, Subparts AA and BB

became effective on December 27, 1994. The Federal Register citation is 59 FR 53753, October 26, 1994.

The information submitted to the EPA, in response to this letter, will be provided to the Florida Department of Environmental Protection.

The final rule addressing organic air emission standards for tanks, surface impoundments and containers, 40 CFR Parts 264 and 265, Subpart CC, was issued on December 6, 1994. It becomes effective on June 5, 1995. The Federal Register citation is 59 FR 62896, December 6, 1994.

In summary, to complete the requested permit modification additional information is required, specifically:

1. Code of Federal Regulation section(s) applicable to valves at the facility.
2. Additional information concerning the applicability of 40 CFR §264.1032 (b), if determined to be applicable, the information specified in 40 CFR §270.24.
3. Equipment information specified in 40 CFR §270.25.

If you have any questions or comments, please contact Jan Martin at (404) 347-3433.

Sincerely yours,



G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

cc: William C. Crawford
FDEP, Southwest District

Certified Mail Receipt # Z-747 667 056

September 1, 1994

Ms. Jan Martin
GA/FL Unit
RCRA Permitting Section
RCRA and Federal Facilities Branch
Waste Management Division
Region IV
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, GA 30365

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Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

RE: Class 1 Permit Modification
Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. # FLD 980 729 610

Dear Ms. Martin:

Laidlaw Environmental Services of Bartow, Inc. (LESB) is submitting a Class 1 Permit Modification (Mod) to the facility's HSWA Permit (Permit # FLD 980 729 610). LESB is requesting that Section V.C. be modified as follows:

1. Section V.C.1. -- This section incorrectly states that the valves at the facility are considered to be in "heavy liquid service". The valves at the facility are in light liquid service, therefore this section should state the valves are in "light liquid service".
2. Sections V.C.1., V.C.2. and V.C.3. -- Each of these three sections references the list of equipment in Attachment 1 of the HSWA Permit.

To comply with the air emissions standards for the state of Florida, the facility has recently added some air emissions control equipment. This equipment contains some additional valves which have been added to the list of equipment and therefore the list in Attachment 1 needs to be revised accordingly or the permit revised as requested below.

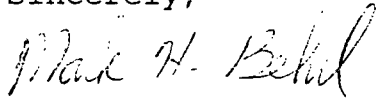
In light of the information given above and in item 3 below and the anticipation of complying with the requirements of the Clean Air Act (CAA), LESB is requesting that the list of equipment in Attachment 1 be removed from the permit and a statement added to the permit requiring the facility to maintain the list on site and shall be made available to the EPA upon request. This method will reduce the number of permit modifications needed while maintaining compliance with the regulation thus reducing the work load and the amount of paper work for the facility and the EPA.

file 4-d

3. The facility is planning to add a HCFC still to reclaim hydrochlorofluorocarbons (HCFCs) and chlorofluorocarbons (CFCs). This unit will not have a process vent because the system is a closed system. These compounds have low boiling points, therefore it is necessary to maintain this closed system process to prevent the loss of the reclaimed product. There will be some additional valves and pumps associated with this HCFC still as well. A schematic and process flowsheet are enclosed.

If you have questions or need additional information please do not hesitate to contact me at 813-533-6111.

Sincerely,



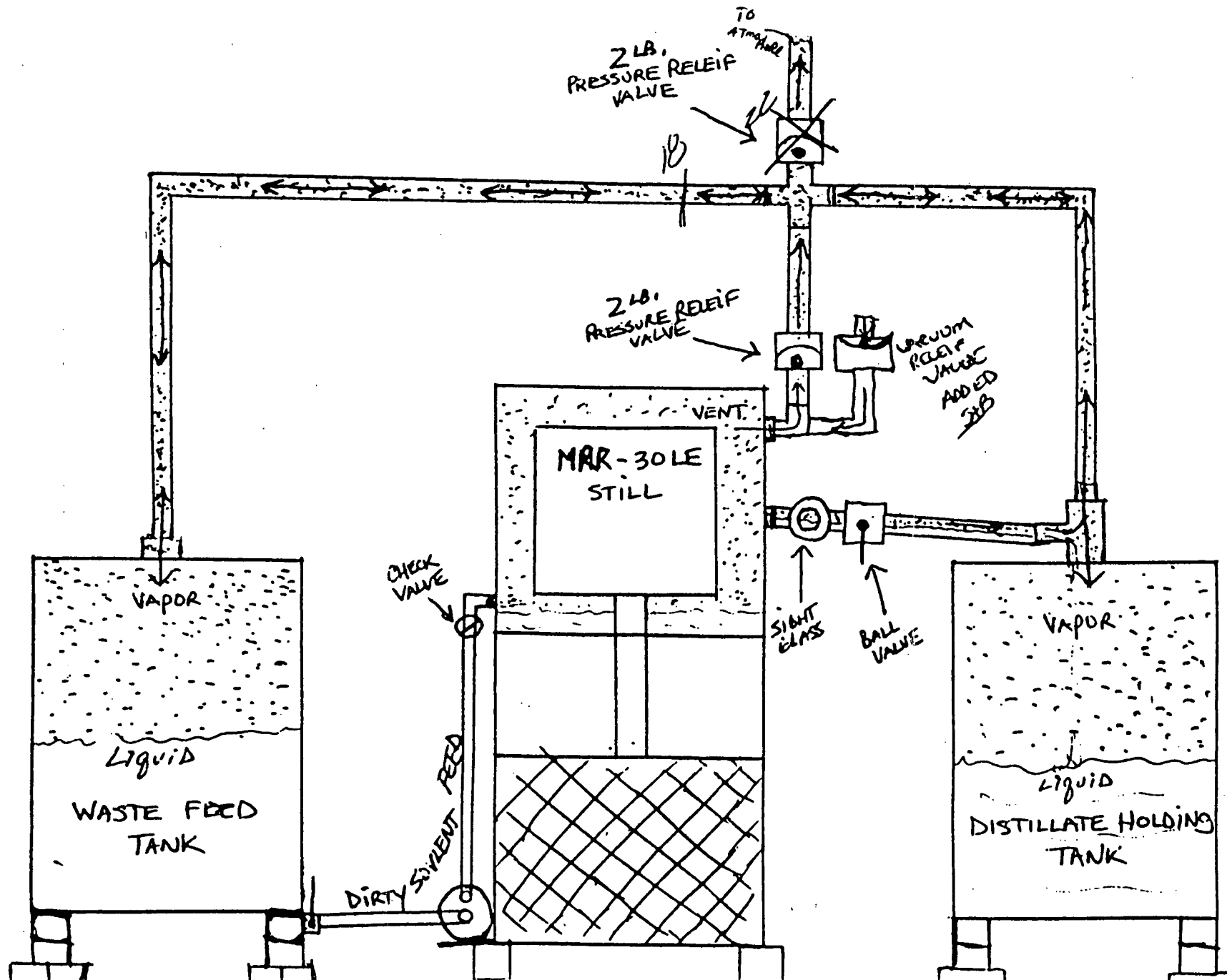
Mark H. Behel
Safety and Compliance Manager

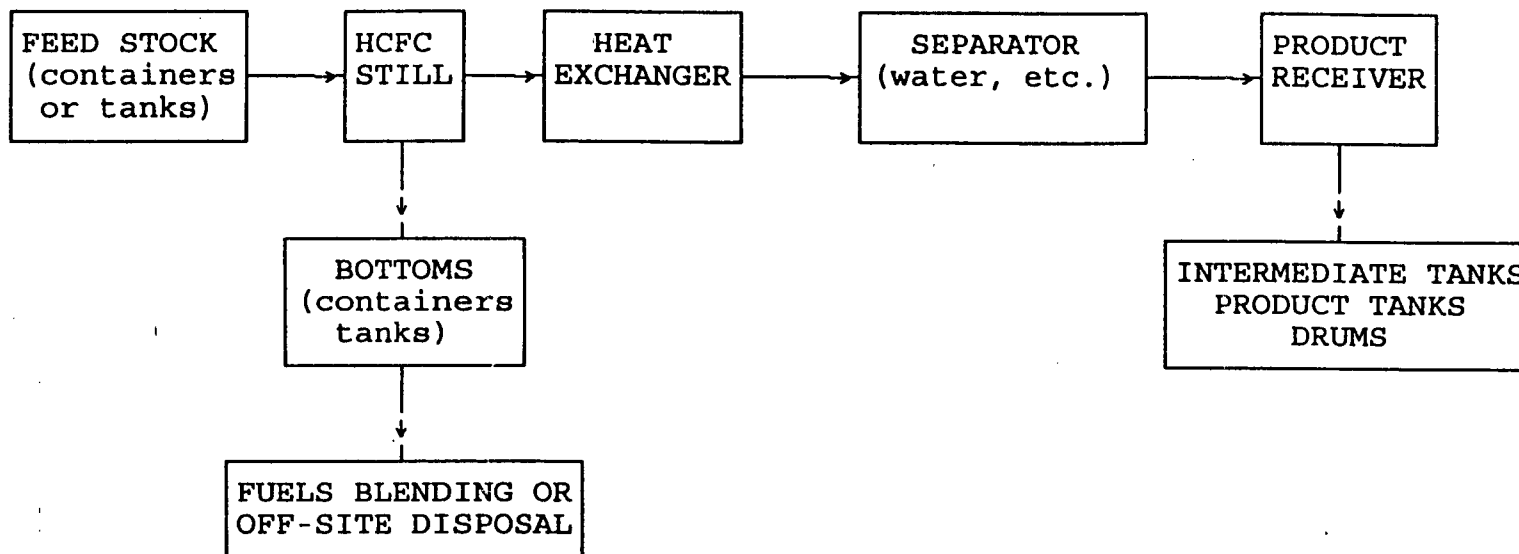
Enclosures:

pc: Mike Merashoff
Ashley Chadwick
E. Lin Longshore
Mr. Bill Crawford - FDEP, Tampa

SOLVENT RECOVERY AND HCFC SYSTEM FOR MAR-30LE

4/6/93 SGL





(08/05/94)

Figure 1.1c HCFC Still Flowsheet

via Airborne Express
#2611306482

April 17, 1992

H053-182926

U. S. Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365
Attn: James S. Kutzman, P.E.

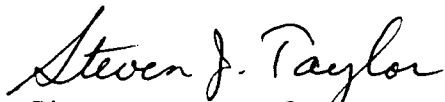
AI, 4-d

Re: Release from Solid Waste Management Unit #4
Laidlaw Environmental Services of Bartow, Inc.
E.P.A. I.D. Number FLD 980 729 610

Dear Mr. Kutzman:

Enclosed please find a RCRA Facility Investigation Workplan, submitted per Condition II.C.2. of LESB's Hazardous and Solid Waste Amendments portion of our RCRA permit.

Sincerely,



Steven J. Taylor
Safety and Compliance Manager

D. E. R.

cc: Bill Crawford, FDER, Tampa
Ashley Chadwick, LES, Antioch
Lin Longshore, LES, Columbia
Paul Manak, LES, Bartow
Satish Kastury, FDER, Tallahassee

APR 20 1992

SOUTHWEST DISTRICT
TAMPA

SJT/dm
2452A

*Material filed as
Attachment 4-B*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

HOS3-182726

AI, 4-d

4WD-RCRA/EE
FEB 13 1992

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Steven J. Taylor
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

RE: Confirmatory Sampling Workplan
Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. Number FLD 980 729 610

D. E. R.

FEB 18 1992

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Taylor:

The United States Environmental Protection Agency (EPA) has reviewed the Confirmatory Sampling Workplan as dated January 22, 1992, for your facility. Based upon EPA's review, the aforementioned workplan is hereby approved.

This letter constitutes approval of your Confirmatory Sampling-Integrity Testing Workplan and implementation of the approved workplan may begin immediately. The Fume Hood Collection Tank is listed in your Hazardous and Solid Waste Amendments (HSWA) portion of your permit as requiring Confirmatory Sampling. Per condition II.D.1. of this permit, sampling shall not exceed sixty (60) days. Submission of the final report describing all sampling or integrity testing results is due within ninety (90) days upon receipt of this letter.

If you have any questions regarding this matter, please contact Carin DeBenedictis of my staff at (404) 347-3433.

Sincerely yours,

G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

cc: Satish Kastury, FDER, Tallahassee
Bill Crawford, FDER, Tampa

FAX and FEDERAL EXPRESS

January 22, 1992

H053-182726

AI. 4-d

D. E. R.

U. S. Environmental Protection Agency
Office of RCRA and Federal Facilities
345 Courtland Street
Atlanta, Georgia 30365
Attention: James Kutzman

JAN 23 1992

SOUTHWEST DISTRICT
TAMPA

Re: Laidlaw Environmental Services of Bartow, Inc. FLD980729610
HSWA Permit, Notice of Technical Inadequacy
Confirmatory Sampling Workplan

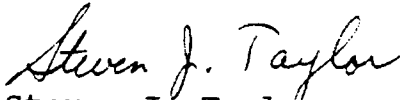
Dear Mr. Kutzman;

In response to your January 9, 1992, letter and notice, we submit for your review the attached confirmatory sampling workplan, consisting of the integrity test as previously described. Our consulting engineer has determined that the vessel in question is an integral part of the facility's connection to the Bartow municipal sewer system, and that, appropriately, it should be tested for leaks according to Standard Plumbing Codes as described.

We must reiterate our position, stated in our August 9, 1991, review of the RCRA Facility Assessment Report and our December 18, 1991, response to HSWA Permit condition II.D.1., that the vessel in question should not require further investigation, since the RFA found no evidence of a leak, no evidence of a defect in the tank, no evidence of possible soil contamination, and even stated that five-gallon jugs were in use in the laboratory fume hoods to collect wastes.

If you disagree with the proposed testing methodology, please arrange to meet with facility representatives at your earliest convenience so that we may resolve this issue.

Sincerely,



Steven J. Taylor
Safety and Compliance Manager

SJT/drs

cc: Paul Manak, LES Bartow
Ashley Chadwich, LES Antioch
Barbara Hamilton, LES Columbia
Bill Crawford, FDER Tampa
Satish Kastury, FDER Tallahassee

2158A

R.O. COVINGTON & ASSOCIATES

CONSULTING ENGINEERS

Bartow Industrial Park
225-A Bartow Municipal Airport
Bartow, Florida 33830-9504
Phone: (813) 533-6282
Fax: (813) 534-1723

RECEIVED
JAN 21 1992

1 417 417

January 15, 1992

Mr. Steven J. Taylor
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, FL 33830-9504

Dear Mr. Taylor:

Ref: 0X011

Subject: Confirmatory Sampling Workplan

This letter is in response to the January 9, 1992 Notice of Technical Inadequacy, prepared by Mr. James S. Kutaman, P.E. of the U.S. EPA. The item in question is a 250 gallon polyethylene tank, located outside the building, between the laboratory sinks and fume hood along the north wall, installed between the sink drain and the building sewer system.

A tank integrity test needs to be formulated and conducted. Should this integrity test indicate a leak, an adequate workplan that will inspect soil samples for contamination will be developed. The tank integrity test shall be as indicated on the attached sheet.

If the tank's integrity is proven, a report to that effect will be issued.

If you have any questions, please feel free to call.

Yours Truly,



Lawrence N. Smith

LNS/ve

TANK INTEGRITY TEST

The Tank Integrity Test shall be conducted as outlined in the 1991 Standard Plumbing Code section 417.2.1 for drainage systems. Procedures shall be as follows:

1. Isolate tank and associated valves and piping from building sewer system by capping piping on downstream side of tank, after shut off valve (SOV). Upstream side shall be disconnected from building system and a 10' ft head pipe shall be installed ahead of upstream shut off valve (SOV).
2. Fill system with water to 10' ft head level.
3. Inspect system for leaks and drop in water level for a period of 1 hour.
4. Test passes if there is no sign of leaking or loss of water level in the head pipe.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

Chambers
H053-182726

AI, 4-d

4WD-RCRAFFB

JAN 09 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

D. E. R.

JAN 13 1992

SOUTHWEST DISTRICT
TAMPA

Mr. Steven J. Taylor
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

RE: Notice of Technical Inadequacy
Laidlaw Environmental Services of Bartow, Inc.
Confirmatory Sampling Workplan
EPA I.D. Number FLD 980 729 610

Dear Mr. Taylor:

The United States Environmental Protection Agency (EPA) has reviewed Laidlaw Environmental Services of Bartow, Inc.'s (LESB) Confirmatory Sampling Workplan dated December 18, 1991, and has determined it is inadequate. Enclosed please find EPA's comments on the workplan.

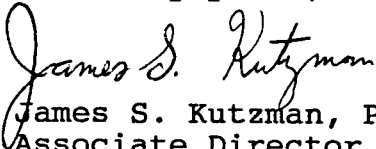
Please submit a revised workplan no later than January 22, 1992. Note that until the workplan is approved, LESB has not fulfilled the requirements for permit condition II.D.1 of the Hazardous and Solid Waste Amendments portion of your Resource Conservation and Recovery Act (RCRA) permit dated December 5, 1991. A copy of the revised workplan should be mailed to:

Mr. James S. Kutzman, P.E.
Associate Director
Office of RCRA & Federal Facilities
Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30365

ATTN: Waste Engineering Section

Failure to comply with any permit condition may result in enforcement actions initiated by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. 6928, under which EPA may seek the imposition of penalties of up to \$25,000 per day of continued noncompliance. Should you have any questions on the review comments or are still unclear as to how to appropriately respond, please contact Ms. Susan Zazzali at (404) 347-3433. For questions regarding compliance and enforcement, please contact Mr. Javier Garcia of the Waste Compliance Section at (404) 347-7603.

Sincerely yours,



James S. Kutzman, P.E.
Associate Director
Office of RCRA & Federal Facilities
Waste Management Division

Enclosure

cc: Satish Kastury, FDER, Tallahassee
✓ Bill Crawford, FDER, Tampa

Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. Number FLD 980 729 610
Comments on Confirmatory Sampling Workplan

1. The tank integrity test must be reviewed and certified by an independent, qualified registered professional engineer in accordance with 40 CFR §270.11 (d), that attests to the tank system's integrity.
2. Provide a description of the tank integrity test method to be used including equipment/instrumentation, procedures, protocol and leak threshold detection limit.
3. Please describe how test result data will be analyzed. What methods will be used to account for the following factors that may influence test results: Thermal expansion and contraction of product and vapor pockets, structural deformation of the tank, evaporation and condensation within the tank, and wave disturbances?
4. Should the integrity test results indicate that there has been a leak, a new workplan will be required for the proposed soil sampling phase. Detailed sampling procedures and quality assurance/quality control measures will be required.

VIA CERTIFIED MAIL

December 20, 1991

D. E. R.

DEC 23 1991

RCRA and Federal Facilities Branch
Waste Management Division
United States Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365
Attention: James Kutzman

SOUTHWEST DISTRICT
TAMPA

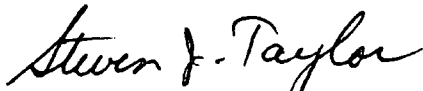
Re: Laidlaw Environmental Services of Bartow, Inc.
FLD 980 729 610, HSWA Permit

Dear Mr. Kutzman;

This letter, the copies of correspondence with the Florida Department of Environmental Regulation, and the enclosed information serves as notice that evidence of surficial aquifer groundwater contamination has been discovered in the area of the South stormwater retention basin, identified in the HSWA Permit as SWMU #4. We are currently working with FDER to evaluate this situation, and will copy your office on all future correspondence.

If you have any questions or comments, please contact me.

Sincerely,



Steven J. Taylor
Safety and Compliance Manager

SJT/drs

cc: Paul Manak, LES, Bartow
Ashley Chadwick, LES, Antioch
Barbara Hamilton, LES, Columbia
Bill Crawford, FDER, Tampa
Satish Katstury, FDER, Tallahassee

2067A

Stormwater Management at
Laidlaw Environmental Services of Bartow

1. All rainwater which falls into contained areas around RCRA units is captured, collected, and pumped to the wastewater storage tank (T-604) for discharge to the City of Bartow publicly-owned treatment works.
2. Rainwater which enters the drum storage building is collected in the center trench and pumped to the wastewater storage tank (T-604).
3. Rainwater which falls on the driveway is collected at the trench on the south side of the drive for approximately fifteen (15) minutes and pumped to the wastewater storage tank (T-604). Due to the volume of rainwater which typically falls on the driveway, after collecting the initial flush the manually-operated gate valve at the trench sump is opened to allow water to flow into the stormwater retention basin.
4. The stormwater retention basin holds water until enough accumulates to flow over the weir and into airport drainage ditches.
5. All movement of water between containment areas, sumps, and the wastewater storage tank is done by manual operation of all valves and pumps.

ST/drs
2064A

1" = 20'

NOTE: Control swale bottom elevations
to be maintained and kept free
from sedimentation.

SEE SHEET THREE OF THREE SHEETS

S 0° 25' 39" E ~ 421.79'

Hay Bales during
construction only

BARTON, FLORIDA
IMPROVEMENT SURVEY OF PORTIONS OF
THE SE 1/4 OF THE SE 1/4 OF
SECTION 14, TOWNSHIP 29 SOUTH, RANGE 25 EAST
POLK COUNTY, FLORIDA

DATE: JULY 1, 1986

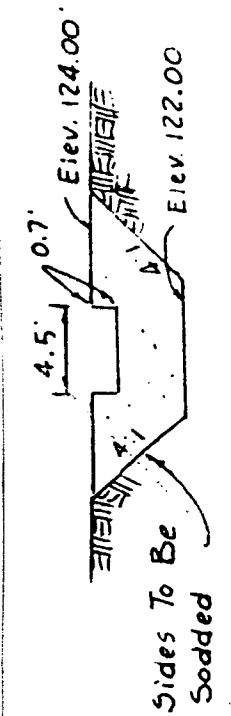
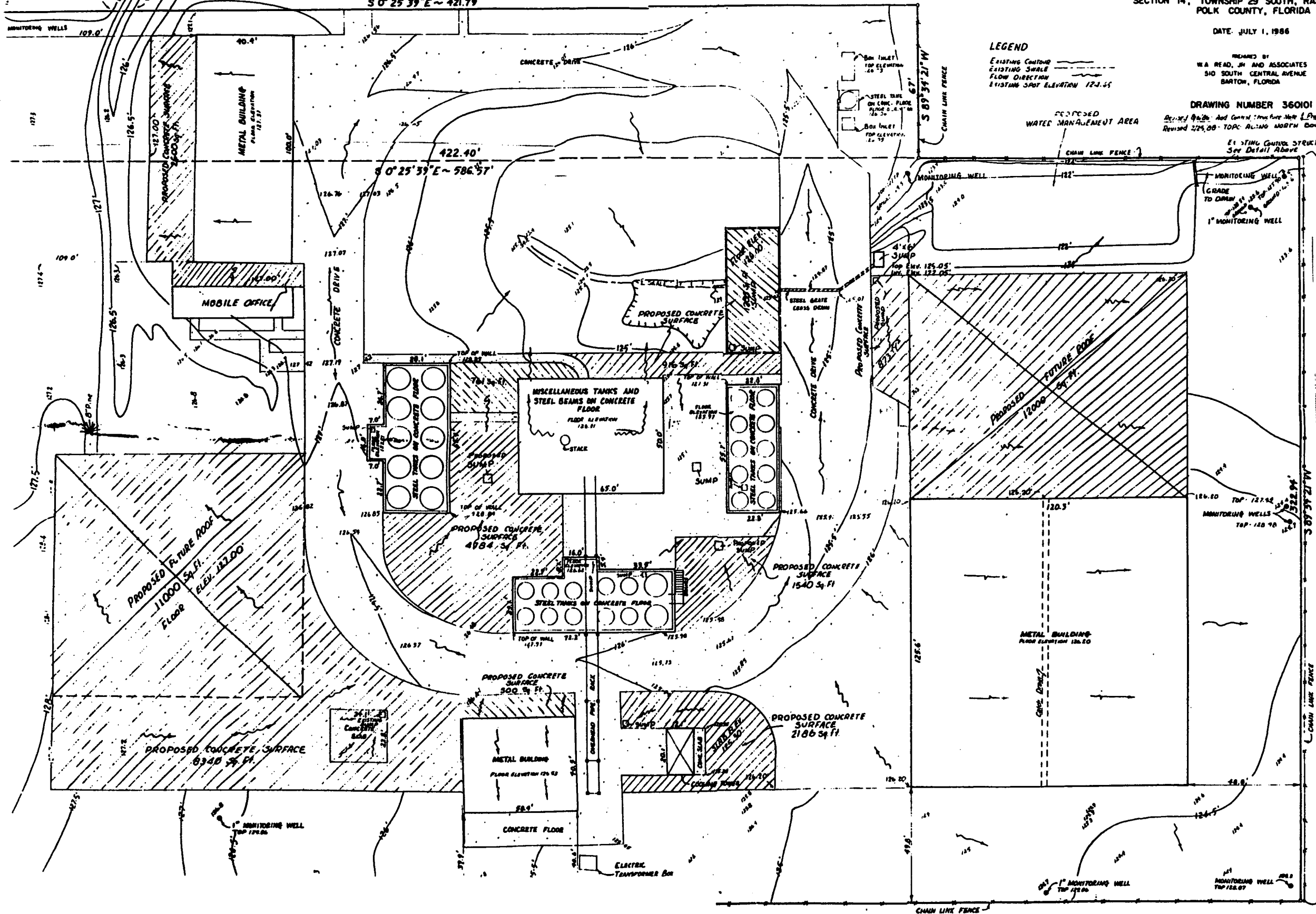
LEGEND

EXISTING CONTROL
EXISTING SWALE
FLOW DIRECTION
EXISTING SPOT ELEVATION 123.55

DRAWING NUMBER 360101

Revised 4/22/86 - Add Control Structure Near Proposed S.W. 1/4
Revised 2/25/86 - TOP: ALONG NORTH BOUNDARY WLL

EXISTING CONTROL STRUCTURE #2 TO BE A
See Detail Above



CONTROL STRUCTURE
Not To Scale

Revised 4/27/86 - Proposed Improvements WLL
Revised 4/22/86 - Control Structure Top Elevation WLL
Revised 3/22/86 - Show Proposed Improvements WLL
SHEET TWO OF THREE SHEETS



WADSWORTH/ALERT
LABORATORIES, INC.

QUALITY CONTROL SECTION

- Quality Control Summary
- Laboratory Blanks
- Laboratory Control Sample
- Matrix Spike/Matrix Spike Duplicate Results
- Sample Custody Documentation



WADSWORTH/ALERT
LABORATORIES, INC.

QUALITY ASSURANCE / QUALITY CONTROL
PROGRAM SUMMARY

Wadsworth/ALERT Laboratories considers continuous analytical method performance evaluations to be an integral portion of the data package, and routinely includes the pertinent QA/QC data associated with various analytical result reports. Brief discussions of the various QA/QC procedures utilized to measure acceptable method and matrix performance follow.

Surrogate Spike Recovery Evaluations

Known concentrations of designated surrogate spikes, consisting of a number of similar, non-method compounds or method compound analogues, are added, as appropriate, to routine GC and GC/MS sample fractions prior to extraction and analysis. The percent recovery determinations calculated from the subsequent analysis is an indication of the overall method efficiency for the individual sample. This surrogate spike recovery data is displayed alongside acceptable analytical method performance limits at the bottom of each applicable analytical result report sheet.

NOTE: Acceptable method performance for Base/Neutral Acid extractables is indicated by two (2) of three (3) surrogates for each fraction with a minimum recovery of ten (10) percent each. For Pesticides one (1) of two (2) surrogates meeting performance criteria is acceptable.

Laboratory Analytical Method Blank Evaluations

Laboratory analytical method blanks are systematically prepared and analyzed in order to continuously evaluate the system interferences and background contamination levels associated with each analytical method. These method blanks include all aspects of actual laboratory method analysis (chemical reagents, glassware, etc.), substituting laboratory reagent water or solid for actual sample. The method blank must not contain any analytes above the reported detection limit. The following common laboratory contaminants are exceptions to this rule provided they are not present at greater than five times the detection limit.

Volatiles

Methylene chloride
Toluene
2-Butanone
Acetone

Semi-volatiles

Dimethyl phthalate
Diethyl phthalate
Di-n-butyl phthalate
Butyl benzyl phthalate
Bis (2-ethylhexyl) phthalate

Metals

Calcium
Magnesium
Sodium

A minimum of five percent (5%) of all laboratory analyses are laboratory analytical method blanks.

Laboratory Analytical Method Check Sample Evaluations

Known concentrations of designated matrix spikes (actual analytical method compounds) are added to a laboratory reagent blank prior to extraction and analysis. Percent recovery determinations demonstrate the performance of the analytical method. Failure of a check sample to meet established laboratory recovery criteria is cause to stop the analysis until the problem is resolved.



WADSWORTH/ALERT
LABORATORIES, INC.

QUALITY ASSURANCE / QUALITY CONTROL
PROGRAM SUMMARY
(cont'd)

At that time all associated samples must be re-analyzed. A minimum of five percent (5%) of all laboratory analyses are laboratory analytical method check samples.

Matrix Spike (MS)/Matrix Spike Duplicate (MSD) Recovery Evaluations

Known concentrations of designated matrix spikes (actual analytical method compounds) are added to two of three separate aliquots of a sequentially predetermined sample prior to extraction and analysis. Percent recovery determinations are calculated from both of the spiked samples by comparison to the actual values generated from the unspiked sample. These percent recovery determinations indicate the accuracy of the analysis at recovering actual analytical method compounds from the matrix. Relative percent difference determinations calculated from a comparison of the MS/MSD recoveries demonstrate the precision of the analytical method. Actual percent recovery and relative percent difference data is displayed alongside their respective acceptable analytical method performance limits in the QA/QC section of the report. The MS/MSD are considered in control when the precision is within established control limits and the associated check sample has been found to be acceptable. A minimum of ten percent (10%) of all analyses are MS/MSD quality control samples.

*****EXAMPLE*****

COMPOUND	SAMPLE CONC.	MS %REC	MSD %REC	RPD	QC LIMITS	
					RPD	RECOVERY
4,4'-DDT	0	95	112	16	22	66-119
Benzene	10	86	93	8	20	39-150

(cmpd. name)	sample	1st%	2nd%	Rel.%	accep. method
	result	recov.	recov.	diff.	perform range

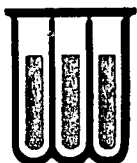
Analytical Result Qualifiers

The following qualifiers, as defined below, may be appended to analytical results in order to allow proper interpretation of the results presented:

J - indicates an estimated concentration (typically used when a dilution, matrix interference or instrumental limitation prevents accurate quantitation of a particular analyte).

B - indicates the presence of a particular analyte in the laboratory blank analyzed concurrently with the samples. Results must be interpreted accordingly.

DIL - indicates that because of matrix interferences and/or high analyte concentrations, it was necessary to dilute the sample to a point where the surrogate or spike concentrations fell below a quantifiable amount and could not be reported.



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY: LAIDLAW ENVIRONMENTAL SERVICES
LAB #: 1K1601-BK
MATRIX: WATER

DATE RECEIVED: 11/16/91
DATE EXTRACTED: NA
DATE ANALYZED: 11/18/91

SAMPLE ID: LABORATORY BLANK

CERTIFICATION #: E84059
HRS84297

VOLATILE ORGANICS
USEPA METHOD 8240 - GC/MS

Acetone	ND**	cis-1,3-Dichloropropene	ND
Benzene	ND	trans-1,3-dichloropropene	ND
Bromodichloromethane	ND	Ethylbenzene	ND
Bromoform	ND	2-Hexanone	ND**
Bromomethane	ND	Methylene chloride	ND
2-Butanone	ND**	4-Methyl-2-pentanone	ND**
Carbon disulfide	ND	Styrene	ND
Carbon tetrachloride	ND	1,1,2,2-Tetrachloroethane	ND
Chlorobenzene	ND	Tetrachloroethene	ND
Chlorodibromomethane	ND	Toluene	ND
Chloroethane	ND	1,1,1-Trichloroethane	ND
Chloroform	ND	1,1,2-Trichloroethane	ND
Chloromethane	ND	Trichloroethene	ND
1,1-Dichloroethane	ND	Vinyl chloride	ND
1,2-Dichloroethane	ND	Xylene(Total)	ND
1,1-Dichloroethene	ND		
1,2-Dichloroethene(Total)	ND		
1,2-Dichloropropane	ND		

NOTE: ND (None Detected, lower detectable limit = 1 ug/L) as rec'd
ND* (None Detected, lower detectable limit = ug/L) as rec'd
ND** (None Detected, lower detectable limit = 10 ug/L) as rec'd
J (Detected, but below quantitation limit; estimated value)
B (Compound detected in method blank associated with this sample)
-- (Not Analyzed)

SURROGATE RECOVERY:	%	ACCEPTABLE LIMITS		
		WATER	SOLID	LOW LEVEL
1,2-Dichloroethane	99	(75-123)	(85-126)	(85-138)
Toluene-d8	102	(92-107)	(89-124)	(89-128)
Bromofluorobenzene	99	(86-115)	(84-124)	(83-128)



WADSWORTH/ALERT
LABORATORIES, INC.

LAB #/: 1K1601-LCS
MATRIX: WATER
METHOD: 8240

DATE RECEIVED: 11/16/91
DATE EXTRACTED: NA
DATE ANALYZED: 11/18/91

LABORATORY CHECK SAMPLE

COMPOUND	LCS %REC	QC LIMITS %RECOVERY
1,1-Dichloroethene	63	56-133
Trichloroethene	78	67-106
Chlorobenzene	89	78-122
Toluene	88	64-128
Benzene	88	83-123
Dichlorobromomethane	75	71-123

L1702

WADSWORTH/ALERT LABORATORIES
SAMPLE SHIPPER EVALUATION AND RECEIPT FORM

Client: LAIDLAW Project Name/Number: _____

Samples Received By: Carol Mc Nulty Date Received: 11/16/91
(Signature)

Sample Evaluation Form By: Carol Mc Nulty LAB No: 3279 / 1K1601-1609
(Signature)

Type of shipping container were samples received in? WAL Cooler X

Client Cooler _____ WAL Shipper _____ Box _____ Other _____

Any "NO" responses or discrepancies should be explained in comments section.

- | | YES | NO |
|---|--------------------|--------------|
| 1. Were custody seals on shipping container(s) intact? | <u>No. Custody</u> | <u>Seals</u> |
| 2. Were custody papers included with samples? | <u>X</u> | _____ |
| 3. Were custody papers properly filled out (ink, signed, match labels)? | <u>X</u> | _____ |
| 4. Did all bottles arrive in good condition (unbroken)? | <u>X</u> | _____ |
| 5. Were all bottle labels complete (Sample No., date, signed, analysis, preservatives)? | <u>X</u> | _____ |
| 6. Were correct bottles used for the tests indicated? | <u>X</u> | _____ |
| 7. Were proper sample preservation techniques indicated? | <u>X</u> | _____ |
| 8. Were samples received within adequate holding time? | <u>X</u> | _____ |
| 9. Were all VOA bottles checked for the presence of air bubbles?
(If air bubbles were found indicate in comment section) | <u>X</u> | _____ |
| 10. Were samples in direct contact with wet ice?
(NOTE TEMPERATURE BELOW) | <u>X</u> | _____ |
| 12. Were samples accepted into the laboratory?
(If no see comments) | <u>X</u> | _____ |

Cooler # _____ Temp 3 °C Cooler # _____ Temp _____ °C
Cooler # _____ Temp _____ °C Cooler # _____ Temp _____ °C

Comments: _____

5910-H BRECKENRIDGE PARKWAY/TAMPA, FL 33610
(813) 621-0784

No 4407.

[illegible]

Distribution Original Accompanies Shipment. Copy returned with Report.

* Report T-1
* Results by Thursday 12

LAIDLAW ENV Svc

H053-182726

VIA CERTIFIED MAIL

December 18, 1991

AI, 4-d

Office of RCRA and Federal Facilities
Waste Management Division
Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365
Attention: James S. Kutzman, P.E., Associate Director

Re: Phase I RCRA Organic Air Emissions from Process Vents
EPA ID Number FLD 980 729 610

Dear Mr. Kutzman;

Your letter dated December 6, 1991, (received December 16) imposed a deadline for response of thirty days from the date of the letter. Since Laidlaw Environmental Services is not under any enforcement or compliance order, other than the regulatory requirement of installation of process vent emission control devices by June 21, 1992, if warranted, we do not understand your issuance of such a deadline. Nevertheless, our responses to your comments are as follows:

Comment: 1. The letter states that the mean organic content of the waste stream during sampling was 22,500 ppm. The test results show this value as the volatile organic content of the waste stream. Please clarify if this value is volatile or total organic content. 40 CFR 264.1034 (d) requires that total organic content be monitored in the waste stream and the emissions. One of the following test methods must be used to make the concentration determination: Methods 9060 and 8420 of SW-846. Please specify which method LESB is using.

Response: Since monitoring was conducted on a vapor, total organic content would be expected to equal volatile organic content. 40 CFR 264.1034(d) states the procedure for claiming exemption from this subpart based on the total organic waste content being less than 10 ppmw. We make no such claim at this time, therefore (d) does not apply.

Comment: 2. The concentration of organics in the waste stream sampled is approximately only 2.5%. In the past LESB has stated that waste streams treated at their facility can have concentrations of almost 100% total organics. If this is the case, why has air monitoring been conducted during treatment of a waste stream that does not resemble the highest concentration that can reasonably be expected, as required by Subpart AA?

Response: Before the imposition of Subpart AA regulations, there was no penalty associated with over-reporting estimated emissions. Since conservative assumptions based on extremely generic formulas such as AP-42 may now require the expenditure of large sums of money for control devices, it is now in our best interests to more accurately characterize actual emission rates.

Comment: 3. As required by 40 CFR §264.1035 all monitoring and testing must reflect conditions that represent highest reasonable operating conditions. Do all three process vents ever operate at the same time? As discussed in comment #2, will LESB treat waste streams with higher concentrations of organics?

Response: All monitoring has been and will be done during the highest reasonable operating conditions, since process equipment at this facility normally operates at consistent rates. At some times, all process units may operate simultaneously. The total of all process vent emissions will be accurately represented by the sum of the individual unit emissions.

Comment: 4. Please be advised that the 3.1 tons/year emission limit is for the facility as a whole not each individual unit at a facility. This is specified in 40 CFR §264.1032(a),

Response: We are aware that all facility process vent emissions together are used for determining the applicability of this Subpart. A review of information previously submitted will show, however, that even a slight reduction in emissions from even one process vent will bring the facility total emissions below the 3.1 tons/year threshold.

Comment: 5. Were all results presented only from the fractionation column? The thin film evaporator and vacuum still vents must also be monitored.

Response: As explained in our letter of November 14, 1991, only the fractionation column has been monitored due to production schedules and equipment failures. All process vents will be monitored, however, refer to the response to #3, above.

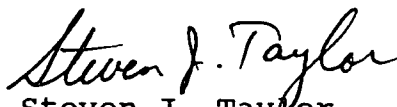
Comment: 6. Please describe in more detail how sampling and monitoring is being conducted as required by 40 CFR §264.1034. Describe how monitoring of the vents is complying with Reference Method 21 in 40 CFR 60. Method 18 in 40 CFR 60 must be followed to determine organic content of emissions. Total organics must be measured in the emissions, not volatile organics as reported in LESB's letter.

Response: Please refer to previous correspondence regarding the basis and methodology of these emissions determinations. 40 CFR 264.1032(c) states that determinations of vent emissions may be based on engineering calculations. The equipment and procedures used here are intended to provide a basis for engineering calculations of emissions. Since there are no control devices at this time, performance testing is not applicable.

The equipment in use at this facility is intended only to provide reasonable assurance of calculated emissions. It is not designed for permanent installation for continuous monitoring. All process vents will be monitored. Monitored and calculated emissions will be verified through separate and independent sampling procedures, so that reasonable engineering calculations specific to this equipment can more accurately characterize facility emissions.

If you have any questions or additional comments, please call me at (813) 533-6111.

Sincerely,



Steven J. Taylor
Safety and Compliance Manager

SJT/drs

cc: Paul Manak, LES, Bartow
Ashley Chadwick, LES, Antioch
Satish Kastury, FDER, Tallahassee
Bill Crawford, FDER, Tampa
Lin Longshore, LES, Columbia
Barbara Hamilton, LES, Columbia

2048A

VIA CERTIFIED MAIL

D. E. R.

December 18, 1991

DEC 19 1991

SOUTHWEST DISTRICT
TAMPA

Office of RCRA and Federal Facilities
Waste Management Division
Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

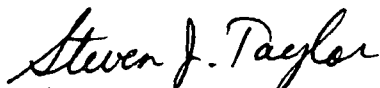
Attention: James S. Kutzman, P.E., Associate Director

Re: Laidlaw Environmental Services of Bartow, FLD980729610
HWSA Permit, Confirmatory Sampling Workplan

Dear Mr. Kutzman;

In accordance with Condition II.D.1. of HSWA Permit number FLD 729 610, Laidlaw Environmental Services of Bartow submits the attached Confirmatory Sampling Workplan for the Solid Waste Management Unit identified in Condition II.A.3 and in Appendix A-3 of the permit (laboratory fume hood collection tank).

Sincerely,



Steven J. Taylor
Safety and Compliance Manager

SJT/drs

cc: Satish Kastury, FDER, Tallahassee
Bill Crawford, FDER, Tampa
Ashley Chadwick, LES, Antioch
Paul Manak, LES, Bartow

2034A

Confirmatory Sampling Workplan for
Laidlaw Environmental Services of Bartow, Inc.

The RCRA Facility Assessment conducted by USEPA, Region IV, and contractor representatives on May 20, 1991, identified one Solid Waste Management Unit at the above facility which was determined to require confirmatory sampling. This unit is a 250-gallon polyethylene tank, installed between the laboratory sinks and fume hood along the north wall, as an additional measure of security to prevent possibly harmful substances from entering the city sewer system. To our knowledge, this tank has never been used as a storage vessel and the outlet valve has remained open, since only small amounts of spent laboratory reagents were ever emptied into the sink.

The RFA report suggested first determining whether or not the contents of the tank are hazardous, then testing the integrity of the tank and associated piping. LESB's position is that since the RFA found no evidence of a leak, no evidence of a defect in the tank, and no evidence of possible soil contamination, that only the integrity of the tank is in question. Therefore, LESB proposes that the tank and associated piping be sealed and subjected to a static pressure test. Upon passing the test, the tank will be removed so as to eliminate further concerns such as this, and piping will be connected directly to the Bartow city sewer system. Upon failing the test, soil samples will be taken and analyzed to determine if contamination exists. The proposed schedule of implementation is provided below for your approval.

Confirmatory Sampling Workplan Schedule
Laidlaw Environmental Services of Bartow, Inc.

<u>Action</u>	<u>Start Date</u>	<u>Completion Date</u>
Static Pressure Test of Tank	Within 20 days of approval	Within 30 days of start
Soil Testing (using a random grid sampling procedure)	Within 15 days of failure of static test	Within 15 days after sampling



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

44WD-RCRAFFB

DEC 10 1991

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Steven J. Taylor
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

RE: Phase I RCRA Organic Air Emissions from Process Vents
EPA I.D. Number FLD 980 729 610

Dear Mr. Taylor:

This letter is in response to your letter dated November 14, 1991, regarding Laidlaw Environmental Services of Bartow, Inc.'s (LESB) monitoring of process vents to determine emission rates. The letter has generated the following comments that must be addressed by LESB within thirty (30) days of the date of this letter:

1. The letter states that the mean organic content of the waste stream during sampling was 22,500 ppm. The test results show this value as the volatile organic content of the waste stream. Please clarify if this value is volatile or total organic content. 40 CFR 264.1034 (d) requires that total organic content be monitored in the waste stream and the emissions. One of the following test methods must be used to make the concentration determination: Methods 9060 and 8420 of SW-846. Please specify which method LESB is using.

2. The concentration of organics in the waste stream sampled is approximately only 2.5%. In the past LESB has stated that waste streams treated at their facility can have concentrations of almost 100% total organics. If this is the case, why has air monitoring been conducted during treatment of a waste stream that does not resemble the highest concentration that can reasonably be expected, as required by Subpart AA?

3. As required by 40 CFR §264.1035 all monitoring and testing must reflect conditions that represent highest reasonable operating conditions. Do all three process vents ever operate at the same time? As discussed in comment #2, will LESB treat waste streams with higher concentrations of organics?

4. Please be advised that the 3.1 tons/year emission limit is for the facility as a whole not each individual unit at a facility. This is specified in 40 CFR §264.1032 (a).

D.E.R.

DEC 12 1991

SOUTHWEST DISTRICT
TAMPA

HCS3-182726


AI, 4-d

5. Were all results presented only from the fractionation column? The thin film evaporator and vacuum still vents must also be monitored.

6. Please describe in more detail how sampling and monitoring is being conducted as required by 40 CFR §264.1034. Describe how monitoring of the vents is complying with Reference Method 21 in 40 CFR 60. Method 18 in 40 CFR 60 must be followed to determine organic content of emissions. Total organics must be measured in the emissions, not volatile organics as reported in LESB's letter.

Should you have any questions on this matter, please call Ms. Susan Zazzali at (404) 347-3433.

Sincerely yours,



Mr. James S. Kutzman, P.E.
Associate Director
Office of RCRA and Federal Facilities
Waste Management Division

✓ cc: Bill Crawford, FDER, Tampa
Satish Kastury, FDER, Tallahassee

Kearney/Centaur Division
A.T. Kearney, Inc.
1100 Abernathy Road, Suite 900
Atlanta, Georgia 30328-5603
404 393 9900
Facsimile 404 396 3091

Management
Consultants

J. Griffin
RECEIVED

AUG 5 1991

14053-182721

14, 4-d

HAZARDOUS WASTE
PERMITTING

August 2, 1991

ATKEARNEY

Ms. Rowena Sheffield
Regional Project Officer
U.S. Environmental Protection Agency
345 Courtland Street NE
Atlanta, Georgia 30365

Reference: EPA Contract No. 68-W9-0040; Work Assignment
No. R04-16-04; Laidlaw Environmental Services;
Bartow, Florida; EPA I.D. No. FLD980729610;
RCRA Facility Assessment; Work Plan Revision 1

Dear Ms. Sheffield:

Enclosed please find the revised work plan for the above-referenced work assignment. This work plan reflects a change in the quality control reviewer due to a conflict of interest development after submission of the original work plan.

As you have requested, a copy of this work plan has been forwarded to Mr. John Griffin, Florida Department of Environmental Regulation.

All applicable A.T. Kearney conflict of interest avoidance procedures have been adhered to for the proposed firms and staffs.

Also enclosed is a work plan approval sheet which you should sign and return to Allen Pearce. In accordance with the procedures for this contract, if the Contracting Officer has not provided written approval of this work plan by August 31, 1991, A.T. Kearney will stop work on this project. In these cases, A.T. Kearney will not resume work until the Contracting Officer approves the work plan.

In order to determine the need for a site health and safety plan, or to prepare such a plan, the Kearney Team may need to obtain additional information from EPA or the facility personnel regarding the potential hazards at this site. If information is not provided to the level of detail required to properly assess potential hazards, A.T. Kearney reserves the right to delay proceeding with the site visit until the information is provided.

Ms. Rowena Sheffield
August 2, 1991
Page 2

In cases where the Kearney Team must delay a site visit due to circumstances outside the Team's control, A.T. Kearney will accommodate the schedule change to the maximum extent possible. However, A.T. Kearney reserves the right to charge EPA for expenses incurred as a direct result of the delay. Any such expenses will be brought to EPA's attention as quickly as possible and will be properly documented.

Due to the technical detail involved we have staffed this project with senior personnel. Therefore, we have exceeded both the average and overall labor rates by more than 15%.

Per EPA's request, this work plan has been double-sided to conserve paper. Please feel free to call me or Steven Shugart, the Kearney Team Work Assignment Manager (who can be reached at 404/448-5400), if you have any questions.

Sincerely,



A. Denise Turner, Ph.D
Technical Director

cc: A. Pearce, EPA OSW
C. Chase, EPA Contracts
S. Zazzali, EPA Region IV
J. Griffin, FDER
A. Glazer
L. Maher
L. Poe
G. Bennsky
P. Williams
D. Scott
K. Gonnella
S. Shugart, GEO
B. Sullivan, KWB

PROPOSED WORK PLAN

Laidlaw Environmental Services
Bartow, Florida
EPA ID NO. FLD980729610

Submitted by:

A.T. Kearney, Inc.
1100 Abernathy Road
Suite 900
Atlanta, Georgia 30328

Submitted to:

Ms. Rowena Sheffield
U.S. Environmental Protection Agency
Regional Project Officer
Region IV
345 Courtland Street N.E.
Atlanta, Georgia 30365

In response to:

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04

August 2, 1991

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

Work Plan Revision No. 1
August 2, 1991

Regional Work Plan Approval

I have reviewed the attached work plan and find it meets our criteria for technical accuracy and properly reflects the scope of work and intended use of the deliverable(s), as described in the work assignment. The projected cost, staff hour estimates, and labor mix are also acceptable.

APPROVAL:

EPA Regional Project Officer

Date

APPROVAL:

EPA Headquarters Project Officer

Date

APPROVAL:

EPA Contracting Officer

Date

CONCURRENCE:

A.T. Kearney Program Director

Date

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

Work Plan Revision No. 1
August 2, 1991

Laidlaw Environmental Services
RCRA FACILITY ASSESSMENT

WORK TO BE PERFORMED

The Kearney Team will perform a file search of relevant files at the State of Florida Department of Environmental Regulation and EPA Region IV offices. Additionally, a Visual Site Inspection (VSI) will be conducted and an RFA Report will be prepared which evaluates the potential for release from each Solid Waste Management Unit (SWMU) and Area of Concern (AOC) identified during the PR/VSI. The report will include suggested further actions and a suggested sampling strategy for each unit or area where sampling is deemed necessary. Sampling activities will not be conducted as part of this assignment.

The overall level of effort estimated for completion of this assignment is based on initial discussions with the EPA WAM or through cursory reviews of the file materials which have indicated that this is a small-sized facility. We anticipate that the proposed level of effort may need to be re-evaluated upon completion of the VSI based on new information found in the file material or during the VSI.

PRIMARY INTENDED USE

The purpose of this work assignment is to assist EPA Region IV in:

- (1) Identifying and gathering information on releases at the facility.
- (2) Evaluating SWMUs and AOCs for release potential to media, and evaluating regulated units, subject to Subpart F requirements, for release potential to media other than ground water.
- (3) Making preliminary determinations regarding releases of concern and the need for further actions, including a Sampling Visit, RCRA Facility Investigation, and/or interim measures at the facility.

PROJECTS AND TASKS

The project will consist of the following tasks:

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

Work Plan Revision No. 1
August 2, 1991

- 2 -

Task 01 - Prepare a work plan. This will include all preliminary contacts, including the EPA Work Assignment Manager (EPA WAM) and state representative, required for the preparation of the work plan.

Files to be reviewed include RCRA, NPDES, CERCLA, and Air Quality, as well as any Solid Waste files and emergency response or spill notifications.

At the request of the EPA WAM, the Kearney Work Assignment Manager (KWAM) will contact the facility to schedule the Visual Site Inspection (VSI).

Task 02 - The Kearney Team will conduct a Preliminary Review (PR) of files at the offices of the U.S. EPA Region IV in Atlanta, Georgia, and Florida Department of Environmental Regulation (FDER) in Tallahassee, Florida; however, a PR Report will not be prepared. At the request of the EPA WAM, the VSI Notification Letter will be prepared by the Kearney Team and submitted to the EPA WAM for transferral to EPA letterhead. The VSI Notification Letter includes a proposed agenda and information needs list. Specific information to be addressed in this PR includes the following:

- Brief description of facility operations, environmental setting, location, regulatory history, and release history.
- A one paragraph summary of each SWMU, including description of unit, history of use and operations, wastes managed, description of release controls, history of any releases from unit, and information needs to be obtained through the VSI.
- List of references used in preparation for the PR. Each document will be cross-referenced within each SWMU write-up.

This task also includes identification of the safety hazards anticipated during the VSI; the completion of a Health and Safety Checklist; and the review of the Health and Safety requirements for the VSI by Kearney's Health and Safety Director.

Task 03 - Prepare for and conduct the VSI. It is estimated that the VSI will require a two-day site visit, along with the associated travel time.

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Prior to the VSI, the Kearney Team will discuss the agenda and goals of the VSI with the EPA WAM. The objectives of the VSI will include the following:

- Verify the information collected during the PR, including the location and condition of the SWMUs and AOCs;
- Identify any additional SWMUs and AOCs;
- Visually inspect and obtain factual information to properly characterize all SWMUs and AOCs. Document field observations with photographs and field logs.
- Review site information with the facility representative and collect additional information to be used in determining the need for further actions.
- Identify possible future sampling locations as appropriate; however, development of a sampling plan and performance of a sampling visit are not included in the scope of this work assignment.

This task includes preparation of the field equipment to be used during the VSI.

Task 04 - Prepare an RFA Report according to the format presented in the Region IV RFA - Related Scope of Work. In cases where information on SWMUs can be combined, tables will be developed instead of individual SWMU write-ups. In addition, a cover letter will accompany the report which will include a summary of major issues and highlights of the RFA Report. The RFA Report will be factual in nature and will be suitable for use as a part of the administrative record. The report submitted to Region IV as the deliverable will not include draft permit conditions and fact sheets, since these will be prepared under a separate work assignment if necessary. The contractor will provide an original and three copies of the final RFA Report.

The deliverable will include a copy of the final report on a word processing diskette formatted in MultiMate.

Task 98 - Perform a quality control review of the draft deliverables.

Task 99 - Provide management oversight for the project.

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
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August 2, 1991

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HEALTH AND SAFETY PLAN

In preparing for the site visit, the Kearney Team will complete a site-specific checklist to identify the activities and potential hazards at the site. Information to complete the checklist will be obtained from the Regional Project Officer, EPA WAM, and/or other EPA staff who are knowledgeable about the site, and from the facility contact.

After the checklist has been completed, a determination will be made by the A.T. Kearney Health and Safety Director regarding the need for a health and safety plan for the site visit based on the anticipated hazards at the site. In cases where a health and safety plan is required, the Kearney Team will develop a specific plan for the site and amend the work plan to include an additional task to provide for resources for plan development. In cases where no health and safety plan is required (i.e., minimal hazard potential), the Kearney Team will follow health and safety procedures as outlined in the Kearney Staff Protocol for site visits.

MONTHLY PROGRESS REPORT

Information regarding the status of this project will be included in the monthly progress reports A.T. Kearney, Inc. provides to EPA. The information will address:

- Work completed to date,
- Difficulties encountered and remedial action taken,
- Anticipated activity during the subsequent reporting period, and
- Sufficiency of authorized dollars and hours to complete the project.

QUALITY CONTROL PLAN

The Kearney Team Work Assignment Manager (KWAM) will conduct milestone checks on each task. In addition, draft project deliverables will be reviewed by a senior technical staff member of K.W. Brown Associates to ensure quality and consistency with EPA regulations and policy.

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

Work Plan Revision No. 1
August 2, 1991

ATTACHMENT I

STAFF RESPONSIBILITY CHART

<u>STAFF</u>	<u>ROLE</u>	<u>AREAS OF RESPONSIBILITY</u>
D. Turner	Technical Director	Management oversight
D. Scott	Technical Assistant	Administrative support, to the Technical Director such as: perform COI checks, assemble and edit work plans, project tracking, general completeness review of deliverables, and distribute documents
S. Shugart	Kearney Team Work Assignment Manager	Day-to-day management; conduct PR & VSI; prepare RFA Report
G. Bennis	Regional Liaison	Initiate work, monitor project planning and implementation, and conduct project performance evaluation
L. France	Technical Staff	Conduct PR and VSI; prepare RFA Report
M. Perrick	Technical Staff	Conduct PR; prepare RFA Report
P. Williams	Health & Safety Director	Review Health & Safety Plan
K. Donnelly	Quality Control Reviewer	Senior-level technical review of final deliverable

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

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August 2, 1991

ATTACHMENT I

STAFF RESPONSIBILITY CHART

<u>STAFF</u>	<u>ROLE</u>	<u>AREAS OF RESPONSIBILITY</u>
D. Turner	Technical Director	Management oversight
D. Scott	Technical Assistant	Administrative support, to the Technical Director such as: perform COI checks, assemble and edit work plans, project tracking, general completeness review of deliverables, and distribute documents
S. Shugart	Kearney Team Work Assignment Manager	Day-to-day management; conduct PR & VSI; prepare RFA Report
G. Bennsky	Regional Liaison	Initiate work, monitor project planning and implementation, and conduct project performance evaluation
L. France	Technical Staff	Conduct PR and VSI; prepare RFA Report
M. Perrick	Technical Staff	Conduct PR; prepare RFA Report
P. Williams	Health & Safety Director	Review Health & Safety Plan
K. Donnelly	Quality Control Reviewer	Senior-level technical review of final deliverable

EPA Contract No. 68-W9-0040
 Work Assignment No. R04-16-04
 Laidlaw Environmental Services
 Bartow, Florida
 RCRA Facility Assessment
 EPA I.D. No. FLD980729610

Work Plan Revision No. 1
 August 2, 1991

ATTACHMENT II

STAFFING

STAFF			TASK						
Name	1/ Labor 2/		01	02	03	04	3/ 98	4/ 99	TOTAL
	Firm	Category							
<u>Technical Director</u>									
D. Turner	K/C	P4	6	-	-	4	-	-	10
<u>Work Assignment Manager</u>									
S. Shugart	GEO	P4	2	-	-	-	-	6	8
<u>Staffing</u>									
G. Bensusky	ATK	P4	2	-	-	-	-	3	5
D. Scott	K/C	T1	8	-	-	-	-	12	20
Tech. Support	K/C		5	-	-	20	-	-	25
P. Williams	K/C	P4	-	2	-	-	-	-	2
S. Shugart	GEO	P4	-	-	20	22	-	-	42
L. France	GEO	P2	-	30	20	100	-	-	150
M. Perrick	GEO	P2	-	13	-	13	-	-	26
Tech. Support	GEO		4	2	-	40	-	-	46
<u>Quality Control</u>									
K. Donnelly	KWB	P4	-	-	-	-	16	-	16
Tech. Support	KWB		-	-	-	-	2	-	2
TOTALS			27	47	40	199	18	21	352

- 1/ ATK = A.T. Kearney, Inc.
 K/C = Kearney/Centaur, a Division of A.T. Kearney, Inc.
 GEO = GeoSyntec Consultants
 KWB = K.W. Brown Associates
- 2/ Provides Labor Classification for Each Staff Person (e.g., P4, P3)
- 3/ Task 98 = Quality Control
- 4/ Task 99 = Project Management

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

Work Plan Revision No. 1
August 2, 1991

ATTACHMENT III

SCHEDULE

<u>Task</u>	<u>Milestone #</u>	<u>Description</u>	<u>Scheduled Date</u>
01	01	Prepare work plan	04/02/91
		Prepare Revision No. 1	08/02/91
02	02	Complete Preliminary Review, prepare facility notification letter and VSI agenda	05/10/91
02	03	Submit health and safety checklist to Health and Safety Director for review	05/10/91
02	04	Submit Health and Safety comments to KWAM	05/17/91
03	05	Conduct Visual Site Inspection	05/20-21/91
04	06	Conduct conference call with EPA	05/24/91
98	07	Submit draft RFA Report to QC	06/12/91
04	08	Submit QC comments to KWAM	06/17/91
04	09	Submit RFA Report to TD	06/19/91
04	10	Submit RFA Report to EPA	06/21/91
04	11	Submit Word Processing diskette to EPA	06/28/91
99	12	KWAM to contact EPA WAM to discuss any questions or concerns of the agency concerning the deliverable	07/19/91
99	13	Project management	In accordance with above milestones

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

Work Plan Revision No. 1
August 2, 1991

ATTACHMENT IV-B

ESTIMATED COST

	<u>Hours</u>	<u>Cost</u>
<u>A.T. Kearney, Inc.</u>		
Labor	62	\$ 2,237
ATK Travel and Subsistence		
K/C Travel and Subsistence		
Other Direct Costs		
Supplies (paper, pens, file folders, etc.)	\$ 39	
Office Support Labor	155	
Photocopy	155	
Postage/Delivery	116	
Telephone/FAX	77	
Misc. Expense (computer leases, off-site file storage, subcontract administration, etc.)	155	
PC Recovery	77	
Total ODC Costs		\$ 774
Subtotal		\$ 3,011
<u>GeoSyntec Consultants</u>		
Labor	272	\$13,202
Fee		994
Travel & Subsistence		1,932
Other Direct Costs		
Postage/Delivery	400	
Telephone/FAX	400	
Office Support Labor	295	
Miscellaneous	200	
Total ODC Costs		\$ 1,295
Subtotal		\$17,423

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

Work Plan Revision No. 1
August 2, 1991

ATTACHMENT IV-B

ESTIMATED COST

(Continued)

K.W. Brown Associates

Labor	18	\$ 1,393
Fee		98

Other Direct Costs

Postage/Delivery	70	
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Total ODC Costs		\$ 70
-----------------	--	-------

Subtotal		\$ 1,561
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SUBTOTAL		\$21,995
----------	--	----------

A.T. Kearney, Inc.

Fee - 3% Base		\$ 660
3% Award		<u>660</u>

Subtotal		\$ 1,320
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<u>TOTAL ESTIMATED COST</u>	<u>352</u>	<u>\$23,315</u>
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AVERAGE LABOR COST PER HOUR FOR ALL FIRMS	\$47.82
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WORK PLAN AVERAGE HOURLY RATE	\$66.24
-------------------------------	---------

EPA Contract No. 68-W9-0040
Work Assignment No. R04-16-04
Laidlaw Environmental Services
Bartow, Florida
RCRA Facility Assessment
EPA I.D. No. FLD980729610

Work Plan Revision no. 1
August 2, 1991

ATTACHMENT IV-A

TRAVEL TABLE

Total Trips	Total People	(1) From/To	Total Train/Air Fare	Total Days	(2) Total Hotel	(2) Total Meals	Rental Car	(3) Total Local Travel	(4) Total Cost
1	1	Atlanta/ Tallahassee, FL	\$ 368	1	48	26	50	10	502
1	2	Atlanta/Tampa	1000	2	216	104	100	10	1,430
TOTAL	3		1,368	3	264	130	150	20	1,932

NOTES

- (1) All trips are roundtrip unless otherwise specified.
- (2) Estimates for hotel and meals are based on allowable per diem rates for the destination city. The estimates are calculated from the total days (e.g., 2 days in Boston, Hotel - 2 x \$81; Meals - 2 x \$34).
- (3) Local travel includes cab fare, public transportation, mileage, parking and tolls.
- (4) In cases of file searches, Regional meetings, etc., travel costs may be divided among several projects; therefore, only a portion of the costs will be shown for each project.

August 13, 1991

D. E. R.

AUG 16 1991

SOUTHWEST DISTRICT
TAMPA

Mr. James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division
USEPA, Region IV
345 Courtland Street, Northeast
Atlanta, Georgia 30365

RE: Hazardous and Solid Waste Amendments Permit
Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. #FLD 980-729-610

Dear Mr. Scarbrough:

On August 8, 1991, we received your letter submitting a copy of the preliminary draft HSWA permit for the facility referenced above. In your letter, you allowed five (5) working days to make comments prior to subsequent public notice of the draft permit. The goal is to simultaneously notice HSWA provisions with the impending state (FDER) permit notice.

Attached are our preliminary comments including our recent RFA response; however, given the short time frame for such comments, we will most likely submit others during the notice period. Of primary concern is the possibility that the general public will be reviewing permit conditions which may be inaccurate and which could cause confusion to the process. Nonetheless, please review these initial responses and incorporate accordingly.

Should you have any questions or comments concerning this submittal, please contact me at (615) 399-8791 or Mr. Steve Taylor at (813) 533-6111.

Sincerely,



Ashley T. Chadwick
S.E. Regional Environmental Manager

pc: Satish Kastury, FDER
Victor San Agustin, FDER
Paul Manak
Steve Taylor
Lin Longshore
Barbara Hamilton, Esq.

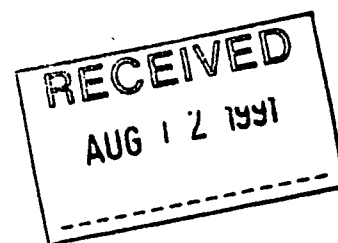
COMMENTS: Draft HSWA Permit

Draft HSWA Reference

- * Title Page: Laidlaw Environmental Services of Bartow, Inc. is the appropriate facility name; this should replace: Laidlaw Environmental Services, Inc.
- * Page 12: Confirmatory sampling is being required for the Fume Hood Collection Tank (SWMU #9). Please refer to #7 on the attached RFA response for our proposal regarding this matter.
- * Page 14: A Confirmatory Sampling Workplan is being required for the above. Again, please reference #7 in our RFA response.
- * Page 27: Section V.E. stipulates maximum waste volumes to be allowed for the vacuum still, thin film evaporator and distillation column. These figures apparently were based on last year's emissions data; however, the company should not be restricted to these amounts. Flexibility should be allowed in consideration that maximum throughput is not the deciding factor, rather the actual emissions should be addressed. There is latitude in the regulations to provide emission control equipment that ensures compliance with the regulations without the arbitrary assignment of restricted waste volumes. The concern is that an increase in waste volumes is possible and the general public could be misled by the amounts specified in the draft.
- * Page 31: Section V1.B (Waste Analysis Plan) requires that the TCLP method be utilized for all of the D-codes listed in Section V1.A of the Draft SWA Permit. This section should be modified to reflect that TCLP analysis or generator knowledge is allowed; also, be reminded that the majority of wastes at Bartow are blended as part of the fuel program. Bartow reserves the right to exercise the provision of accepting generator's knowledge in lieu of the TCLP analysis.

VIA CERTIFIED MAIL

August 9, 1991



James H. Scarbrough, P. E., Chief
RCRA and Federal Facilities Branch
Waste Management Division
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30365

RE: RCRA Facility Assessment Report
Laidlaw Environmental Services of Bartow, FLD980729610

Dear Mr. Scarbrough:

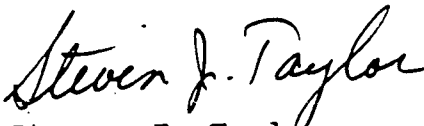
We have reviewed the report referenced above, and have the following comments:

1. The center trench of the drum storage building referenced on page 44 only has one sump, at the East end of the building.
2. The report states that releases to the atmosphere were cited by FDER in May, 1990, (pages 27 & 53). caused by improper manhole covers. The report should delete all references to the 1990 releases, since this was erroneously cited by FDER and was later withdrawm. While the manholes were not constructed as originally designed, there was no evidence that the covers, as installed, caused any release into the air.
3. Storage tank vents referenced on page 53 are not subject to 40 CFR Subpart AA (process vents) requirements, as defined in 40 CFR 264.1030. Subpart BB information was provided to USEPA, Region IV, on December 14, 1990.
4. Intermediate product storage tanks are not subject to either Subpart AA or Subpart BB requirements, since the equipment neither contains nor contacts hazardous waste (page 55). However, Subpart BB information was provided to USEPA, Region IV, on December 14, 1990 (page 58).

5. Process vent emissions and leak detection information was provided to USEPA, Region IV, on December 14, 1990.
6. The description of the paint can crushing operation (page 59) should reference that after the cans are emptied and crushed, they are coated with dry Portland cement to stabilize any remaining liquids prior to disposal.
7. The description of the laboratory fume hood and drain tank (pages 60 & 61) mentions that lab wastes are poured into covered five-gallon jugs, and not the sink. The polypropylene tank outside was installed as an extra measure of environmental security in the sewer system, and has never been used as a storage tank. If the tank is structurally sound, the composition of the material inside does not matter. Therefore, we propose to test the integrity of the tank only, and not the contents. If the tank proves to be sound, we will remove it from the sewer line to avoid such concerns in the future.
8. Product storage tanks are not subject to Subpart AA or Subpart BB requirements, since they neither contain nor contact hazardous waste (page 67). However, Subpart BB information was provided to USEPA, Region IV, on December 14, 1990.

We request that these corrections be made to the RFA report in order that it may more accurately reflect operations at the Bartow facility.

Sincerely,



Steven J. Taylor
Safety and Compliance Manager

cc: Paul Manak, LES, Bartow
Ashley Chadwick, LES, Antioch
Barbara Hamilton, LES, Columbia
Satish Kastury, FDER, Tallahassee
Victor San Agustin, FDER, Tampa



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

1053-182726

4-d

4WD-RCRAFFB

AUG 28 1991

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

D. E. R.

SEP 3 1991

SOUTHWEST DISTRICT
TAMPA

Mr. Steven J. Taylor
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

RE: Finalized RCRA Facility Assessment Report
Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. Number FLD 980 729 610

Dear Mr. Taylor:

Enclosed please find a copy of the final Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) Report. The RFA Report has been revised to reflect most of the comments made by Laidlaw Environmental Services of Bartow, Inc. in their August 9, 1991, letter to the Environmental Protection Agency.

Please note that Laidlaw's comment #2, regarding releases to the atmosphere from manhole covers, has been disregarded due to comments from the Florida Department of Environmental Regulation (FDER). Mr. Victor San Agustin of FDER has stated that the releases were not cited erroneously and that the report has not been withdrawn.

EPA is preparing to issue a draft Hazardous and Solid Waste Amendments (HSWA) permit for Laidlaw Environmental Services of Bartow, Inc. Below is a list of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) identified at this time:

SWMU #

1. Hazardous Waste Fuel Blending Area
2. Drum Staging/Storage Area
3. Waste-Water collection Tank
4. Storm-Water Retention Ponds
5. Crude Storage Area (South Tank Farm)
6. Intermediate Storage Area
7. Process Area
8. Amnesty Days Dumpster
9. Fume Hood Drain Collection Tank
10. Laboratory Satellite Accumulation Containers
11. Boot Cover Disposal Drums
12. Former Laboratory Trailer Drain Containment Pad

AOC #

- A Freon Wash Water Storage Tank

At this time only SWMU # 9 will require further investigation in the form of Confirmatory Sampling. A Confirmatory Sampling Workplan will be required by the HSWA permit.

Should you have any questions concerning the RFA report or the HSWA permit, please contact Ms. Susan Zazzali at (404) 347-3433.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "James H. Scarbrough".

James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

Enclosure

cc: Satish Kastury, FDER, Tallahassee (with enclosure)
Victor San Agustin, FDER, Tampa (with enclosure)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

AUG 28 1991

4WD-RCRAFFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Steven J. Taylor
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

RE: Draft HSWA Permit
Laidlaw Environmental Services of Bartow, Inc.
EPA I.D. Number FLD 980 729 610

Dear Mr. Taylor:

Enclosed please find a copy of the draft Hazardous and Solid Waste Amendments (HSWA) permit for Laidlaw Environmental Services of Bartow, Inc. This draft permit has been revised to take into account Laidlaw's comments, dated August 13, 1991, on the preliminary draft HSWA permit.

EPA has corrected the facility's name throughout the permit as was requested. Laidlaw Environmental Services, Inc. has been changed to read Laidlaw Environmental Services of Bartow, Inc.

Confirmatory Sampling will be required for the Fume Hood Collection Tank (SWMU #9). However, the Confirmatory Sampling Workplan may specify that Phase I of the Confirmatory Sampling will be integrity testing of the tank. If the tank should fail the integrity test, conducted by an independent professional engineer, further assessment will be required in Phase II.

The maximum waste volumes specified for the vacuum still, thin film evaporator, and distillation columns have been removed. The allowable hourly and annual emission rates remain specified.

H053-182726

A. 4-d
D.E.R.

SEP 3 1991

SOUTHWEST DISTRICT
TAMPA

-2-

Section VI.B regarding the use of the Toxicity Characteristic Leaching Procedure (TCLP) has not been changed. This section is not meant to require the TCLP test for every waste sample analyzed. As your comment indicated, Laidlaw may use generator knowledge where appropriate.

Should you have any questions concerning this matter, please contact Ms. Susan Zazzali at (404) 347-3433.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "James H. Scarbrough". The signature is fluid and cursive, with a large initial "J" and a stylized "S".

James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

Enclosure

cc: Satish Kastury, FDER, Tallahassee (w/o enclosure)
Victor San Agustin, FDER, Tampa (w/o enclosure)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JAN 23 1991

4WD-RCRAFFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

D.E.R.

JAN 25 1991

SOUTHWEST DISTRICT
TAMPA

Mr. Steven Taylor
Safety and Compliance Manager
Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

RE: Tricil Recovery Services, Inc. (Bartow, Florida)
EPA I.D. Number FLD 980 729 610
Phase I - RCRA "Organic Emissions" Standards Compliance Plan
First Notice of Deficiencies

Dear Mr. Taylor:

The above referenced compliance plan has been reviewed and found to be incomplete due to the lack of certain information. A list of deficiencies identified at this time is itemized on the enclosed sheet.

We expect to receive your submittal addressing the information requested in this notice within thirty (30) days of receipt of this letter.

Should you have any questions concerning this matter, please call Ms. Susan Zazzali at (404) 347-3433.

Sincerely yours,

James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

Enclosure

cc: Satish Kastury, FDER, Tallahassee
Victor San Agustin, FDER, Southwest District

FIRST NOTICE OF DEFICIENCY

Tricil Recovery Services
EPA I.D. Number FLD 980 729 610
RCRA Organic Air Emission Standards

Federal Regulation
40 CFR

1. For each affected unit the following must be provided:

270.24(b)(1)

- a. Operating hours
- b. Annual throughput
- c. Maximum hourly emissions
- d. waste stream analysis with exact organic concentration

2. Information and data supporting estimates of vent emissions must be provided. For the purpose of determining compliance, estimates of vent emissions must be made using operating parameter values (e.g., temperatures, flow rates, or concentrations) that represent the conditions when the waste management unit is operating at the highest load or capacity level reasonably expected to occur.

270.24(b)(2)

270.24(b)(3)

3. A statement signed and dated by the owner or operator certifying that the operating parameters used in the analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur.

270.24(d)(4)

4. For each piece of equipment, identify the hazardous waste management unit it is associated with.

270.25(a)(1)

5. For each affected piece of equipment the following must be provided:

270.25(a)(4)

- a. the percent total organics in waste stream
- b. the physical state of waste.



December 14, 1990

FEDERAL EXPRESS

D. E. R.
DEC 18 1990
SOUTHWEST DISTRICT
TAMPA

Mr. James H. Scarbrough, P.E. Chief
RCRA and Federal Facilities Branch
Waste Management Division
U.S. Environmental Protection Agency, Region IV
345 Courtland Street
Atlanta, Georgia 30365

RE: Tricil Recovery Services, Inc. (Bartow, Florida)
EPA ID # 980 729 610
Phase I - RCRA "Organic Emissions" Standards

Dear Mr. Scarbrough:

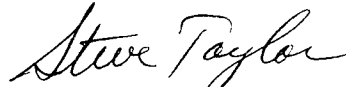
In response to US EPA's December 5, 1990 requests for the information specified in 40 CFR 270.24 and 270.25 (copy attached as Appendix A) regarding the recently promulgated regulations, covering organic emissions from process vents and equipment leaks (40 CFR 264/265 - Subparts AA and BB), the discussions below are provided with supporting documentation attached. Further, the information provided in this package will be incorporated into the Bartow facility's RCRA Part B renewal application currently under review by the Florida Department of Environmental Regulation (FDER).

Forms AA-1 and AA-2, with attached instructions, have been developed internally and completed per the "...AA Applicability Decision Tree" to supply the information specified by 40 CFR 270.24; specifically paragraph (b), which requests certain information on certain types of vents at an affected facility. Form AA-3, with attached instructions, was developed internally to evaluate any closed-vent systems or control devices of which type are not currently in existence at the Bartow facility.

Form BB-1, with attached instructions, has been developed internally and completed per the "...BB Applicability Decision Tree" to supply the information specified by 40 CFR 270.25; specifically paragraph (a), which requests certain information on certain equipment at an affected facility. Forms BB-2 through BB-5, with attached instructions, were developed internally to demonstrate and maintain future waste analysis data, inspection results and records and monitoring results as appropriate. Information concerning the instrument that is intended to be used for our monthly monitoring program is provided as an attachment to Form BB-4.

Should you have any questions, please contact Ashley Chadwick at (615) 244-8960 or myself at (813) 533-6111.

Sincerely,

A handwritten signature in cursive script that reads "Steve Taylor".

Steven Taylor
Safety and Compliance Manager

ST/drs

Attachment

cc: Satish Kastury, FDER - Tallahassee (with attachments)
Bill Crawford, FDER - Southwest District (with attachments)
John Deal, Jr. (with attachments)
Ashley Chadwick (with attachments)
Lin Longshore
Mike Sanderock
Charlie Bodanza
Dave Sprinkle

FORM AA - 1
40 CFR 265/265 - SUBPART AA AFFECTED UNITS LIST
(To Be Maintained In The Operating Record)

HAZARDOUS WASTE ①	PROCESS	TOTAL ORGANIC CONCENTRATION-WASTE	SUPPORTING CALCULATIONS/DOCUMENTATION [Include waste test results or knowledge of waste]	SUBPART AA APPLICABLE ②	
				Yes	No
Vacuum Still	Solvent Extraction	>10%	<div> <div>1988 tons/year</div> <div>0.05</div> </div> <div> <div>1989 tons/year</div> <div>0.12</div> </div>		X
Thin Film Evaporator	Thin Film Evaporation	>10%	<div> <div>0.12</div> </div> <div> <div>1.64</div> </div>		X
Fractionation Column	Distillation	>10%	<div> <div>0.00</div> </div> <div> <div>0.23</div> </div>		X
<p>Calculated emissions based on EPA publication "Compliance of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources", Fourth Edition.</p> <p>Total facility emissions = 1.99 tons/year for 1989. 1990 emissions are expected to equal 1989.</p>					

- 1 - A Facility Site Plan with the approximate location of each unit is attached.
2 - If any units are determined to be affected by Subpart AA, complete Form AA - 2.

FORM AA - 2
40 CFR 264/265 - SUBPART AA POTENTIALLY AFFECTED PROCESS VENTS EVALUATION
(To Be Maintained In The Operating Record)

HAZARDOUS WASTE UNIT	PROCESS DESCRIPTION	PROCESS VENTS		TOTAL ORGANIC CONCENTRATION VENT EMISSION		SUPPORTING CALCULATIONS/DOCUMENTATION [Include Maximum Organic Concentration In Waste; Waste Management Unit Throughputs and Operating Hours; Vent Emissions Rate and Calculations]
		Yes	No	lbs/hr	tons/yr	
Vacuum Still	Solvent Extraction	X			0.12	Calculated emissions based on EPA publication. "Compliance of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources", Fourth Edition.
Thin Film. Evaporator	Thin Film Evaporation	X			1.64	
Fractionation Column	Distillation	X			0.23	

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
B	VALVE	89	>10	✓		LIGHT LIQUID	MONTHLY MONITORING
"	"	91	"	"		"	"
"	"	92	"	"		"	"
"	"	94	"	"		"	"
"	"	95	"	"		"	"
"	"	97	"	"		"	"
"	"	98	"	"		"	"
"	"	100	"	"		"	"
"	"	101	"	"		"	"
"	"	104	"	"		"	"
"	"	105	"	"		"	"
"	"	106	"	"		"	"
"	"	107	"	"		"	"
"	"	110	"	"		"	"
"	"	111	"	"		"	"
"	"	112	"	"		"	"
"	"	113	"	"		"	"

1 - A Facility Site Plan with the approximate locations of each unit is attached.

2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
B	VALVE	73	> 10	✓		LIGHT LIQUID	MONTHLY MONITORING
"	"	74	"	"		"	"
"	"	75	"	"		"	"
"	"	76	"	"		"	"
"	"	77	"	"		"	"
"	"	78	"	"		"	"
"	"	79	"	"		"	"
"	"	80	"	"		"	"
"	"	81	"	"		"	"
"	"	82	"	"		"	"
"	"	83	"	"		"	"
"	"	85	"	"		"	"
"	"	86	"	"		"	"
"	"	87	"	"		"	"
"	"	88	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
 2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
A	VALVE	54	>10	✓		LIGHT LIQUID	MONTHLY MONITORING
"	"	55	"	"		"	"
"	"	56	"	"		"	"
"	"	59	"	"		"	"
"	"	60	"	"		"	"
"	"	61	"	"		"	"
"	"	62	"	"		"	"
B	VALVE	63	"	"		"	"
"	"	64	"	"		"	"
"	"	65	"	"		"	"
"	"	66	"	"		"	"
"	"	67	"	"		"	"
"	"	69	"	"		"	"
"	"	70	"	"		"	"
"	"	72	"	"		"	"

1 - A Facility Site Plan with the approximate locations of each unit is attached.

2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
A	VALVE	34	> 10	✓		LIGHT LIQUID	MONTHLY MONITORING
"	"	35	"	"		"	"
"	"	36	"	"		"	"
"	"	37	"	"		"	"
"	"	38	"	"		"	"
"	"	39	"	"		"	"
"	"	40	"	"		"	"
"	"	42	"	"		"	"
"	"	43	"	"		"	"
"	"	44	"	"		"	"
"	"	47	"	"		"	"
"	"	48	"	"		"	"
"	"	49	"	"		"	"
"	"	50	"	"		"	"
"	"	51	"	"		"	"
"	"	52	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
 2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
A	VALVE	17	> 10	✓		LIGHT LIQUID	MONTHLY MONITORING
"	"	18	"	"		"	"
"	"	19	"	"		"	"
"	"	20	"	"		"	"
"	"	21	"	"		"	"
"	"	22	"	"		"	"
"	"	23	"	"		"	"
"	"	24	"	"		"	"
"	"	25	"	"		"	"
"	"	26	"	"		"	"
"	"	27	"	"		"	"
"	"	28	"	"		"	"
"	"	30	"	"		"	"
"	"	31	"	"		"	"
"	"	32	"	"		"	"
"	"	33	"	"		"	"

1 - A Facility Site Plan with the approximate locations of each unit is attached.

2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
A	VALVE	2	> 10	✓		LIGHT LIQUID	MONTHLY MONITORING
"	"	3	"	"		"	"
"	"	4	"	"		"	"
"	"	6	"	"		"	"
"	"	7	"	"		"	"
"	"	8	"	"		"	"
"	"	9	"	"		"	"
"	"	10	"	"		"	"
"	"	11	"	"		"	"
"	"	12	"	"		"	"
"	"	13	"	"		"	"
"	"	14	"	"		"	"
"	"	15	"	"		"	"
"	"	16	"	"		"	"

1 - A Facility Site Plan with the approximate locations of each unit is attached.

2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
C	VALVE	200	>10	X		LIGHT LIQUID	MONTHLY MONITORING
"	"	201	"	"		"	"
"	"	202	"	"		"	"
"	"	203	"	"		"	"
"	"	204	"	"		"	"
"	"	205	"	"		"	"
"	"	206	"	"		"	"
"	"	207	"	"		"	"
"	"	208	"	"		"	"
"	"	209	"	"		"	"
"	"	284	"	"		"	"
"	"	285	"	"		"	"
"	"	286	"	"		"	"
"	"	287	"	"		"	"
"	"	288	"	"		"	"
"	"	289	"	"		"	"
"	"	290	"	"		"	"
"	"	291	"	"		"	"
"	"	292	"	"		"	"
		435	"	"			

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
C	VALVE	176	> 10	X		LIGHT LIQUID	MONTHLY MONITORING
"	"	177	"	"		"	"
"	"	178	"	"		"	"
"	"	179	"	"		"	"
"	"	180	"	"		"	"
"	"	181	"	"		"	"
"	"	182	"	"		"	"
"	"	183	"	"		"	"
"	"	184	"	"		"	"
"	"	186	"	"		"	"
"	"	187	"	"		"	"
"	"	189	"	"		"	"
"	"	190	"	"		"	"
"	"	191	"	"		"	"
"	"	193	"	"		"	"
"	"	194	"	"		"	"
"	"	195	"	"		"	"
"	"	196	"	"		"	"
"	"	197	"	"		"	"
"	"	198	"	"		"	"
"	"	199	"	"		"	"

1 - A Facility Site Plan with the approximate locations of each unit is attached.

2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
C	VALVE	156	>10	X		LIGHT LIQUID	MONTHLY MONITORING
"	"	157	"	"		"	"
"	"	158	"	"		"	"
"	"	159	"	"		"	"
"	"	160	"	"		"	"
"	"	161	"	"		"	"
"	"	162	"	"		"	"
"	"	163	"	"		"	"
"	"	164	"	"		"	"
"	"	165	"	"		"	"
"	"	166	"	"		"	"
"	"	167	"	"		"	"
"	"	168	"	"		"	"
"	"	169	"	"		"	"
"	"	170	"	"		"	"
"	"	171	"	"		"	"
"	"	172	"	"		"	"
"	"	173	"	"		"	"
"	"	174	"	"		"	"
"	"	175	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
C	VALVE	137	>10	X		Light+Liquid	MONTHLY MONITORING
C	"	138	"	"		"	"
C	"	139	"	"		"	"
C	"	140	"	"		"	"
C	"	141	"	"		"	"
C	"	142	"	"		"	"
C	"	143	"	"		"	"
C	"	144	"	"		"	"
C	"	145	"	"		"	"
C	"	146	"	"		"	"
C	"	147	"	"		"	"
C	"	148	"	"		"	"
C	"	149	"	"		"	"
C	"	150	"	"		"	"
C	"	151	"	"		"	"
C	"	152	"	"		"	"
C	"	153	"	"		"	"
C	"	154	"	"		"	"
C	"	155	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
B	VALVE	114	>10	✓		LIGHT LIQUID	MONTHLY MONITORING
"	"	116	"	"		"	"
"	"	117	"	"		"	"
"	"	118	"	"		"	"
"	"	119	"	"		"	"
"	"	120	"	"		"	"
"	"	121	"	"		"	"
"	"	122	"	"		"	"
"	"	123	"	"		"	"
"	"	124	"	"		"	"
"	"	125	"	"		"	"
"	"	126	"	"		"	"
"	"	127	"	"		"	"
"	"	129	"	"		"	"
"	"	130	"	"		"	"
"	"	132	"	"		"	"
"	"	133	"	"		"	"
"	"	134	"	"		"	"
"	"	135	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	265	> 10	X		Light Liquid	Monthly Monitoring
"	"	266	"	"		"	"
"	"	267	"	"		"	"
"	"	268	"	"		"	"
"	"	269	"	"		"	"
"	"	270	"	"		"	"
"	"	271	"	"		"	"
"	"	215	"	"		"	"
"	"	216	"	"		"	"
"	"	217	"	"		"	"
"	"	218	"	"		"	"
"	"	219	"	"		"	"
"	"	220	"	"		"	"
"	"	221	"	"		"	"
"	"	222	"	"		"	"
"	"	223	"	"		"	"
"	"	224	"	"		"	"
"	"	225	"	"		"	"
"	"	226	"	"		"	"
"	"	227	"	"		"	"
"	"	228	"	"		"	"
"	"	229	"	"		"	"
"	"	230	"	"		"	"
"	"	231	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	233	> 10	X		Light Liquid	Monthly Monitoring
//	//	234	//	//		//	//
//	//	235	//	//		//	//
//	//	236	//	//		//	//
//	//	237	//	//		//	//
//	//	238	//	//		//	//
//	//	436	//	//		//	//
//	//	437	//	//		//	//
//	//	240	//	//		//	//
//	//	241	//	//		//	//
//	//	242	//	//		//	//
//	//	243	//	//		//	//
//	//	244	//	//		//	//
//	//	245	//	//		//	//
//	//	246	//	//		//	//
//	//	247	//	//		//	//
//	//	248	//	//		//	//
//	//	249	//	//		//	//
//	//	250	//	//		//	//
//	//	251	//	//		//	//
//	//	256	//	//		//	//
//	//	257	//	//		//	//
//	//	258	//	//		//	//
//	//	259	//	//		//	//
//	//	260	//	//		//	//
//	//	261	//	//		//	//

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
 2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	262	> 10	X		Light Liquid	Monthly Monitoring
"	"	263	"	"		"	"
"	"	264	"	"		"	"
"	"	333	"	"		"	"
"	"	334	"	"		"	"
"	"	335	"	"		"	"
"	"	336	"	"		"	"
"	"	337	"	"		"	"
"	"	426	"	"		"	"
"	"	427	"	"		"	"
"	"	363	"	"		"	"
"	"	405	"	"		"	"
"	"	464	"	"		"	"
"	"	465	"	"		"	"
"	"	408	"	"		"	"
"	"	415	"	"		"	"
"	"	378	"	"		"	"
"	"	409	"	"		"	"
"	"	377	"	"		"	"
"	"	410	"	"		"	"
"	"	462	"	"		"	"
"	"	383	"	"		"	"
"	"	384	"	"		"	"
"	"	385	"	"		"	"
"	"	386	"	"		"	"
"	"		"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	389	> 10	X		Light Liquid	Monthly Monitoring
"	"	390	"	"		"	"
"	"	395	"	"		"	"
"	"	457	"	"		"	"
"	"	458	"	"		"	"
"	"	412	"	"		"	"
"	"	411	"	"		"	"
"	"	364	"	"		"	"
"	"	365	"	"		"	"
"	"	413	"	"		"	"
"	"	414	"	"		"	"
"	"	406	"	"		"	"
"	"	407	"	"		"	"
"	"	366	"	"		"	"
"	"	367	"	"		"	"
"	"	368	"	"		"	"
"	"	369	"	"		"	"
"	"	467	"	"		"	"
"	"	374	"	"		"	"
"	"	375	"	"		"	"
"	"	376	"	"		"	"
"	"	459	"	"		"	"
"	"	460	"	"		"	"
"	"	461	"	"		"	"
"	"		"	"		"	"
"	"		"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	374	> 10	X		Light Liquid	Monthly Monitoring
"	"	375	"	"		"	"
"	"	376	"	"		"	"
"	"	459	"	"		"	"
"	"	460	"	"		"	"
"	"	461	"	"		"	"
"	"	379	"	"		"	"
"	"	380	"	"		"	"
"	"	381	"	"		"	"
"	"	382	"	"		"	"
"	"	416	"	"		"	"
"	"	453	"	"		"	"
"	"	454	"	"		"	"
"	"	455	"	"		"	"
"	"	417	"	"		"	"
"	"	391	"	"		"	"
"	"	393	"	"		"	"
"	"	392	"	"		"	"
"	"	445	"	"		"	"
"	"	446	"	"		"	"
"	"	464	"	"		"	"
"	"	451	"	"		"	"
"	"	450	"	"		"	"
"	"	452	"	"		"	"
"	"	359	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	360	> 10	X		Light Liquid	Monthly Monitoring
//	//	368	//	//		//	//
//	//	362	//	//		//	//
//	//	371	//	//		//	//
//	//	370	//	//		//	//
//	//	372	//	//		//	//
//	//	419	//	//		//	//
//	//	420	//	//		//	//
//	//	444	//	//		//	//
//	//	353	//	//		//	//
//	//	354	//	//		//	//
//	//	355	//	//		//	//
//	//	356	//	//		//	//
//	//	357	//	//		//	//
//	//	358	//	//		//	//
//	//	418	//	//		//	//
//	//	397	//	//		//	//
//	//	442	//	//		//	//
//	//	394	//	//		//	//
//	//	396	//	//		//	//
//	//	398	//	//		//	//
//	//	402	//	//		//	//
//	//	403	//	//		//	//
//	//	399	//	//		//	//

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
 2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	400	> 10	X		Light Liquid	Monthly Monitoring
//	//	401	//	//		//	//
//	//	447	//	//		//	//
//	//	449	//	//		//	//
//	//	338	//	//		//	//
//	//	339	//	//		//	//
//	//	340	//	//		//	//
//	//	341	//	//		//	//
//	//	342	//	//		//	//
//	//	343	//	//		//	//
//	//	344	//	//		//	//
//	//	345	//	//		//	//
//	//	346	//	//		//	//
//	//	347	//	//		//	//
//	//	348	//	//		//	//
//	//	349	//	//		//	//
//	//	350	//	//		//	//
//	//	351	//	//		//	//
//	//	352	//	//		//	//
//	//	252	//	//		//	//
//	//	253	//	//		//	//
//	//	254	//	//		//	//
//	//	255	//	//		//	//
//	//	293	//	//		//	//
//	//	294	//	//		//	//
//	//		//	//		//	//
//	//		//	//		//	//
//	//		//	//		//	//

1 - A Facility Site Plan with the approximate locations of each unit is attached.

2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	295	> 10	X		Light Liquid	Monthly Monitoring
"	"	296	"	"		"	"
"	"	297	"	"		"	"
"	"	298	"	"		"	"
"	"	299	"	"		"	"
"	"	300	"	"		"	"
"	"	301	"	"		"	"
"	"	302	"	"		"	"
"	"	303	"	"		"	"
"	"	304	"	"		"	"
"	"	305	"	"		"	"
"	"	306	"	"		"	"
"	"	307	"	"		"	"
"	"	308	"	"		"	"
"	"	309	"	"		"	"
"	"	310	"	"		"	"
"	"	311	"	"		"	"
"	"	312	"	"		"	"
"	"	313	"	"		"	"
"	"	314	"	"		"	"
"	"	315	"	"		"	"
"	"	316	"	"		"	"
"	"	317	"	"		"	"
"	"	318	"	"		"	"
"	"	319	"	"		"	"

1 - A Facility Site Plan with the approximate locations of each unit is attached.

2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
D	VALVE	320	> 10	X		Light Liquid	Monthly Monitoring
"	"	321	"	"		"	"
"	"	322	"	"		"	"
"	"	323	"	"		"	"
"	"	324	"	"		"	"
"	"	325	"	"		"	"
"	"	326	"	"		"	"
"	"	327	"	"		"	"
"	"	328	"	"		"	"
"	"	329	"	"		"	"
"	"	330	"	"		"	"
"	"	331	"	"		"	"
"	"	332	"	"		"	"
"	"	272	"	"		"	"
"	"	273	"	"		"	"
"	"	274	"	"		"	"
"	"	275	"	"		"	"
"	"	276	"	"		"	"
"	"	277	"	"		"	"
"	"	278	"	"		"	"
"	"	279	"	"		"	"
"	"	280	"	"		"	"
"	"	281	"	"		"	"
"	"	282	"	"		"	"
"	"	283	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
E	VALVE	501	>10	X		LIQUID	MONTHLY MONITORING
"	"	502	"	"		"	"
"	"	503	"	"		"	"
"	"	504	"	"		"	"
"	"	505	"	"		"	"
"	"	506	"	"		"	"
"	"	507	"	"		"	"
"	"	508	"	"		"	"
"	"	509	"	"		"	"
"	"	510	"	"		"	"
"	"	511	"	"		"	"
"	"	512	"	"		"	"
"	"	513	"	"		"	"
"	"	514	"	"		"	"
"	"	515	"	"		"	"
"	"	516	"	"		"	"
"	"	517	"	"		"	"
"	"	518	"	"		"	"
"	"	519	"	"		"	"
"	"	520	"	"		"	"
"	"	521	"	"		"	"
"	"	522	"	"		"	"
"	"	523	"	"		"	"
"	"	524	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
E	VALVE	525	>10	X		LIQUID	MONTHLY MONITORING
"	"	526	"	"		"	"
"	"	527	"	"		"	"
"	"	528	"	"		"	"
"	"	529	"	"		"	"
"	"	530	"	"		"	"
"	"	531	"	"		"	"
"	"	532	"	"		"	"
"	"	533	"	"		"	"
"	"	534	"	"		"	"
"	"	535	"	"		"	"
"	"	536	"	"		"	"
"	"	537	"	"		"	"
"	"	538	"	"		"	"
"	"	541	"	"		"	"
"	"	542	"	"		"	"
"	"	543	"	"		"	"
"	"	544	"	"		"	"
"	"	545	"	"		"	"
"	"	547	"	"		"	"
"	"	548	"	"		"	"
"	"	549	"	"		"	"
"	"	550	"	"		"	"
"	"	551	"	"		"	"
"	"	553	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
 2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
E	VALVE	555	>10	X		LIQUID	MONTHLY MONITORING
"	"	556	"	"		"	"
"	"	557	"	"		"	"
"	"	558	"	"		"	"
"	"	560	"	"		"	"
"	"	561	"	"		"	"
"	"	562	"	"		"	"
"	"	563	"	"		"	"
"	"	564	"	"		"	"
"	"	565	"	"		"	"
"	"	566	"	"		"	"
"	"	567	"	"		"	"
"	"	568	"	"		"	"
"	"	569	"	"		"	"
"	"	570	"	"		"	"
"	"	571	"	"		"	"
"	"	573	"	"		"	"
"	"	574	"	"		"	"
"	"	575	"	"		"	"
"	"	576	"	"		"	"
"	"	577	"	"		"	"
"	"	578	"	"		"	"
"	"	579	"	"		"	"
"	"	580	"	"		"	"
"	"	581	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1 (Continued)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE							
E	VALVE	583	>10	X		LIQUID	MONTHLY MONITORING
"	"	584	"	"		"	"
"	"	585	"	"		"	"
"	"	586	"	"		"	"
"	"	587	"	"		"	"
"	"	589	"	"		"	"
"	"	590	"	"		"	"
"	"	591	"	"		"	"
"	"	592	"	"		"	"
"	"	593	"	"		"	"
"	"	594	"	"		"	"
"	"	595	"	"		"	"
"	"	596	"	"		"	"
"	"	597	"	"		"	"
"	"	598	"	"		"	"
"	"	599	"	"		"	"
"	"	601	"	"		"	"
"	"	600	"	"		"	"
"	"	602	"	"		"	"
"	"	603	"	"		"	"
"	"	604	"	"		"	"
"	"	605	"	"		"	"
"	"	606	"	"		"	"
"	"	607	"	"		"	"
"	"	608	"	"		"	"

- 1 - A Facility Site Plan with the approximate locations of each unit is attached.
2 - Supporting documentation should be attached.

FORM BB - 1
40 CFR 264/265 - SUBPART BB AFFECTED EQUIPMENT LIST
(To Be Maintained In The Operating Record)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
PUMPS IN LIGHT LIQUID SERVICE							
B	Pump	71	>10	X		Liquid	Monthly Monitoring
E	"	188	"	X		"	"
E	"	192	"	X		"	"
D	"	438	"	X		"	"
D	"	439	"	X		"	"
D	"	463	"	X		"	"
D	"	456	"	X		"	"
D	"	466	"	X		"	"
D	"	443	"	X		"	"
D	"	441	"	X		"	"
D	"	448	"	X		"	"
D	"	421	"	X		"	"
E	"	501	"	X		"	"
E	"	539	"	X		"	"
E	"	540	"	X		"	"
E	"	546	"	X		"	"
E	"	552	"	X		"	"
E	"	553	"	X		"	"
E	"	554	"	X		"	"
E	"	559	"	X		"	"

^① - A Facility Site Plan with the approximate locations of each unit is attached.

^② - Supporting documentation should be attached.

FORM BB - 1
40 CFR 264/265 - SUBPART BB AFFECTED EQUIPMENT LIST
(To Be Maintained In The Operating Record)

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
PUMPS IN LIGHT LIQUID SERVICE							
E	Pump	572	>10	X		Liquid	Monthly Monitoring
E	"	582	"	X		"	"
E	"	588	"	X		"	"

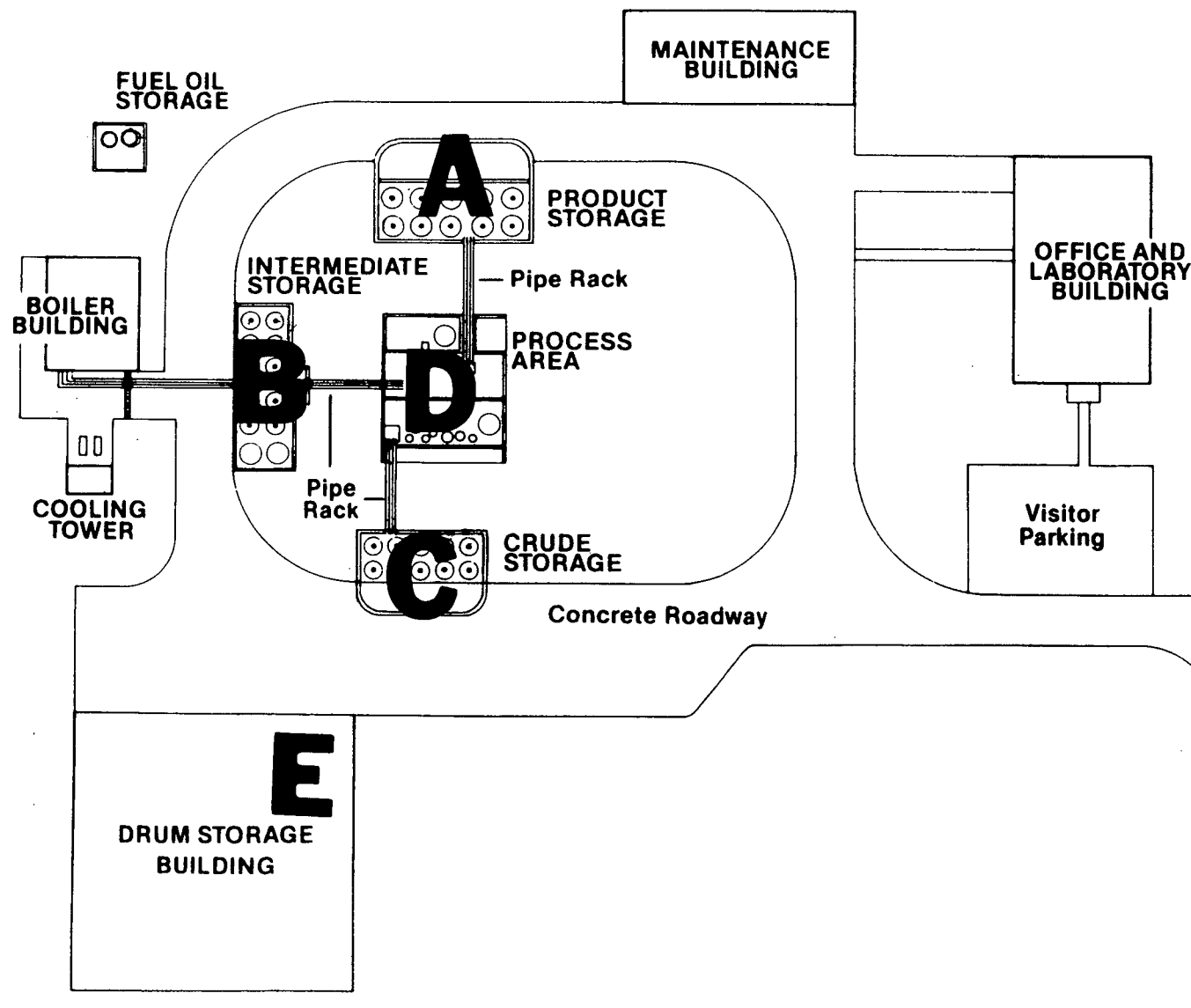
① - A Facility Site Plan with the approximate locations of each unit is attached.

② - Supporting documentation should be attached.



Site Map

Tricil Recovery Services Inc.



GEM

GASTECH
ENVIRONMENTAL
MONITORS

8/22/90

DIVISION OF GAS TECH INC.
SALES OPPORTUNITY ANNOUNCEMENT

APPLICATION: EPA METHOD 21/VOC LEAK DETERMINATION

TO: GAS TECH INC. DISTRIBUTORS

Dear GAS TECH INC. Distributors:

EPA Method 21 for fugitive emissions testing is an application I've always wished we had an instrument to satisfy. NOW WE DO. The GEM Trace-Techtor meets the Method 21 instrument requirements. Those of you familiar with the EPA Method 21 application can now offer the Trace-Techtor as an excellent instrument to satisfy Method 21 for VOC leak detection.

The Trace-Techtor is not "just another GasTechtor". It is a new concept designed into the GasTechtor case. Utilizing a new circuit design and special sensors, the Trace-Techtor detects hydrocarbon vapors over sensitive ranges not previously practical with standard Gas Tech instruments. The standard ranges are 0-100, 0-1000, and 0-10,000 ppm, calibrated to hexane. An optional range set is 0-500, 0-5000, and 0-50,000 ppm, calibrated to methane. Please specify range, cal gas, gas or vapor customer will be detecting, and application when ordering an instrument.

The instrument can be provided to either have no response to methane (used primarily for UST work), or to have full gas response (needed for Method 21 testing). We have created a new part number for the Method 21 (full response) version. This is 72-8417E-01 at \$1195.00 list, or the kit version, 72-8417E-02, at \$1395.00 list. Standard goodies with the Trace-Techtor are recorder output, alarm silence switch (internal), low flow alarm, hydrophobic filter, 5 foot hose, 10" probe, and battery charger.

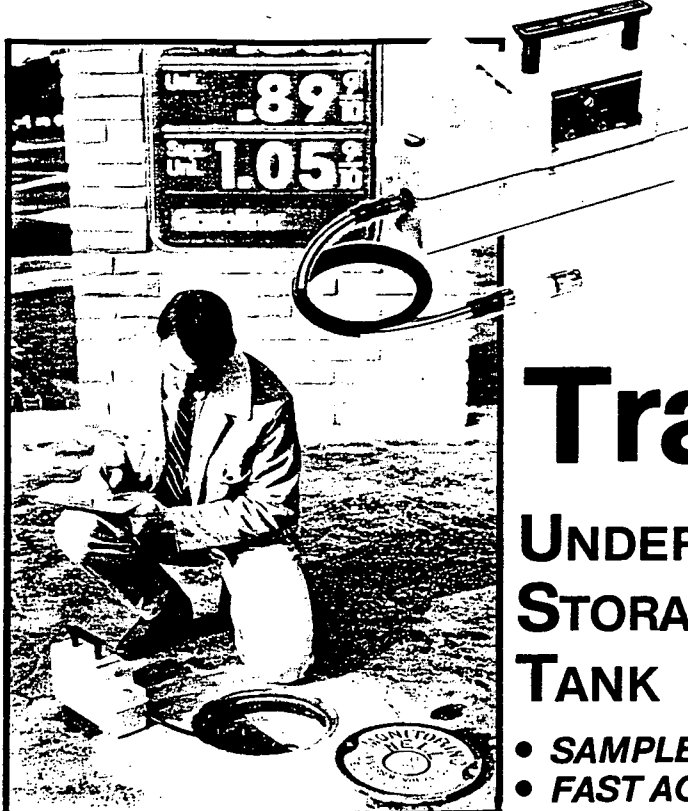
Those of you already familiar with the Trace-Techtor have been delighted with it, as have your customers. Those of you who are not yet involved with GEM instruments are probably missing good sales opportunities in your area. As a Gas Tech Inc. distributor, GEM instruments are currently being offered for your distribution at the same discounts you currently receive from Gas Tech Inc. Don't miss the boat. Pass this letter on to all your sales people.

Feel free to contact me if you have any questions regarding GEM instruments or applications.

Sincerely,



Bob Pellissier
Division Manager
Gastech Environmental Monitors
BP/mfb
Enclosed: Trace-Techtor brochure



GAS STATIONS FARMS INDUSTRY

GASTECH'S

Proven dependability
built in!

HIGHLY SENSITIVE Trace-Techtor™

UNDERGROUND STORAGE TANK HYDROCARBON VAPOR LEAK TESTER

- **SAMPLE DRAWING**
- **FAST ACCURATE RESPONSE**
- **EASY TO USE—FULLY PORTABLE**
- **ANALOG OR DIGITAL READOUT AVAILABLE**
- **HELPS YOU MEET EPA REQUIREMENTS**
- **INTRINSICALLY SAFE, CLASS I, DIV. 1 GROUP C & D**
- **RUGGED FIBERGLASS CASE**

DESCRIPTION:

The Trace-Techtor is another fine GasTechtor instrument designed specifically for Underground Storage Tank monitoring, and other applications requiring quick determination of trace amounts of hydrocarbon vapor levels. Using a pump to draw in a sample for analysis, 90% response is obtained in less than 20 seconds. An accurate, high sensitivity/high stability catalytic sensor is the heart of the instrument, providing detection over three ranges of 100, 1000, and 10,000 ppm by use of a selector switch. Other optional ranges are available up to

50,000 ppm, and an optional digital readout is available.

The instrument is fully self-contained, battery operated, and holds up to rugged field use. The high sensitivity and accuracy of this meter make it ideal for checking monitor wells, annular spaces of doublewall tanks, and soil samples. A test record book is provided to log well test data and easily observe trends. The Trace-Techtor comes complete with batteries, charger, five foot hose and probe, and hydrophobic filter, ready for use.

OPERATION:

The Trace-Techtor is easy to use. Battery operated, it will run for over ten hours between charges. Quick response and recovery make it an excellent survey tool for many uses. Warm-up takes about two minutes, and then the unit is zeroed on ambient fresh air, the range is selected (analog versions only), and it is ready for use. An internal pump draws the sample in through the sampling accessories and onto the sensor for analysis. The hydrophobic filter prevents water from inadvertently being sucked into the instrument.

Audible alarms are provided for low battery

condition, sensor fail, low flow, and a user adjustable alarm point is also provided for increasing vapor levels. A log book is provided for well monitoring data recording, which makes it easy to spot an irregular trend. Periodic logging of results allows residual background hydrocarbon vapor levels to be ignored, with an increase in reading indicating a possible leak has occurred. PPM readings can also be used to determine compliance with local maximum residual vapor limits.

**ORDER FROM: (407) 767-0747
ERIF SALES COMPANY**

295 Anchor Road • Casselberry, FL 32707

DETECTION TECHNIQUE

A high quality GasTech catalytic combustion sensor is utilized to provide sensitive, accurate ppm readings on the Trace-Techtor. This sensor utilizes a platinum catalyst to burn trace amounts of hydrocarbon vapors. The burning action increases the sensor electrical resistance, and this change is interpreted by the instrument electronics to provide an accurate ppm readout.

This detector has several advantages over other detector types used in UST applications. It is faster responding and more

accurate than metal oxide or "cold" sensors sometimes used. This makes it ideal for use to verify readings from fixed monitors using these types of sensors.

The sensor responds well to petroleum based hydrocarbon vapors (BTEX), but has no response from methane or natural gas. Optionally, the instrument can be modified to also respond well to methane and natural gas.

SPECIFICATIONS:

Housing: Rugged water resistant fiberglass molded case.

Battery Life: Over ten hours per charge. (Ni-cad batteries).

Display: Analog standard (digital optional).

Ranges: 100, 1000, and 10,000 ppm standard (optional range 500, 5,000 and 50,000 ppm).

Calibration: Hexane (Representative of BTEX vapors).

Sensor Type: Catalytic combustion.

Sampling Method: Pump drawn.

Response Time: 20 seconds to 90% response.

Accuracy: 5% of full scale to 10,000 ppm.

Intrinsically safe: Class I, Div. 1, Group C & D.

Alarms: Low battery, sensor fail, low flow, high vapor reading.

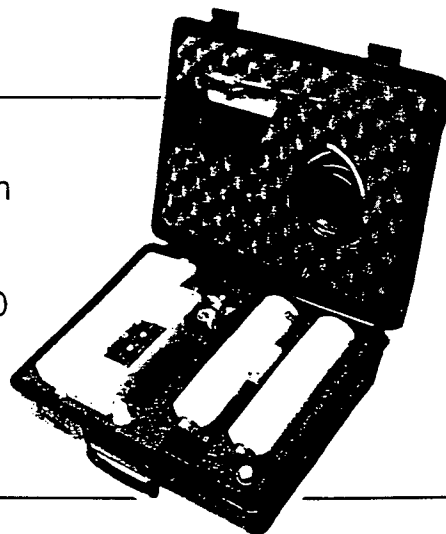
Recorder Output: Standard, 0-1 VDC.

External Controls: Selector switch for on/off, battery check and range select. Pot for zero. (span and alarm pots internally accessible).

Optional: Carrying Strap
Calibration equipment
Carrying case
Dilution fitting (for testing air purged spaces)

Warranty: One year materials and workmanship.

Also available: The Trace-Techtor is also available in a "kit" form, which includes a padded carrying case for instrument and accessories, plus calibration equipment. The calibration equipment includes two cylinders of 4400 ppm hexane, valve, sample bag, sample fitting with tubing, plus a screwdriver. Each disposable cylinder is good for about eight calibration checks.



GEM

**GASTECH
ENVIRONMENTAL
MONITORS**

A Division of

GASTECH

8445 Central Ave., Newark CA 94560
Phone # (415) 794-1973 Fax # (415) 794-6210

Specifications subject to change without notice.
Contact your authorized GEM distributor for more information.

Distributed by:

ERIF SALES COMPANY
295 Anchor Road
Casselberry, Florida 32707
(407)-767-0747

FORM BB - 2
40 CFR 264/265 - SUBPART BB WEEKLY INSPECTION LOG
(To Be Maintained In The Operating Record)

DATE: _____

EQUIPMENT I.D. NUMBER	Weekly Visual Inspection Summary			Date Leak Detected	Date Leaking Equip. Marked	Date of Initial Repair Efforts (≤ 5 Days)	Date Repairs Completed/ Markings Removed	Description of Repairs	Repair <u>will</u> take > 15 days -Reason -Expected Repair Date (If Yes, Complete next Column)	Signature of Facility Manager Approving Repair Delay	Comments
	Date	No Leak	If Leak; Complete Columns @ Right								

FORM BB - 2 (Continued)

EQUIPMENT I.D. NUMBER	Weekly Visual Inspection Summary			Date Leak Detected	Date Leaking Equip. Marked	Date of Initial Repair Efforts (≤ 5 Days)	Date Repairs Completed/ Markings Removed	Description of Repairs	Repair will take > 15 days -Reason -Expected Repair Date (If Yes, Complete next Column)	Signature of Facility Manager Approving Repair Delay	Comments
	Date	No Leak	If Leak; Complete Columns @ Right								

Log Completed By: _____ Date: _____

Environmental Manager's Signature: _____ Date: _____

Facility Manager's Signature: _____ Date: _____

FORM BB - 3
40 CFR 264/265 - SUBPART BB COMPRESSOR DAILY CHECK LOG
(To Be Maintained In The Operating Record)

COMPRESSOR IDENTIFICATION NUMBER: _____

DATES/WEEK: _____

D A Y	Inspectors Initials	Inspection Summary			Date Leak Detected	Date Leaking Equip. Marked	Date of Initial Repair Efforts (≤ 5 Days)	Date Repairs Completed/ Markings Removed	Description of Repairs	Repair <u>will</u> take > 15 days -Reason -Expected Repair Date (If Yes, Complete next Column)	Signature of Facility Manager Approving Repair Delay	Comments
		Date	No Leak	If Leak; Complete Columns @ Right								
1												
2												
3												
4												
5												
6												
7												

Environmental Manager's Signature: _____ Date: _____

Facility Manager's Signature: _____ Date: _____

MONTH: _____

Page 1 of ____

FORM BB - 4 (Continued)

HAZARDOUS WASTE UNIT	ASSIGNED IDENTIFICATION #	MONTHLY MONITORING RESULTS		COMMENTS
		Date	Result	

Log Completed By: _____ Date: _____

Environmental Manager's: _____ Date: _____
Signature (if appropriate)

Facility Manager's Signature: _____ Date: _____

FORM BB - 5
40 CFR 264/265 - SUBPART BB LEAK RESPONSE REPORT *
(To Be Maintained In The Operating Record)

DATE: _____

Date Leak Detected (Reading > 10,000 ppm)	Date Leaking Equip. Marked	Date of Initial Repair Efforts (≤ 5 Days)	Date Repairs Completed/ Markings Removed	Description of Repairs	Repair <u>will</u> take > 15 days -Reason -Expected Repair Date (If Yes, Complete next Column)	Signature of Facility Manager Approving Repair Delay	Comments

Report Filed By: _____ Date: _____

Report Completed
 ("Date Repairs Completed..."
 Column Completed) By: _____ Date: _____

Environmental Manager's Signature: _____ Date: _____
 (If appropriate)

Facility Manager's Signature: _____ Date: _____

* To be completed only in the event that a reading of $\geq 10,000$ ppm is detected during monitoring.

CERTIFICATION:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

M. L. Smith
Signature

12/14/90
Date

Facility Mgr.
Title



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OCT 24 1990

4WD-RCRAFFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Steven Taylor, Environmental Manager
Tricil Recovery Services
Route 3, Box 249
Bartown, Florida 33830

RE: Phase I Resource Conservation and Recovery Act Air Emission
Standards
Tricil Recovery
EPA I.D. Number FLD 980 729 610

Dear Mr. Taylor:

On December 21, 1990, Phase I of the Resource Conservation and Recovery Act (RCRA) Air Emission Standards will become effective. All RCRA permits issued after this date will contain conditions to ensure compliance with the new requirements. These conditions will be in the Environmental Protection Agency (EPA) Hazardous and Solid Waste Amendments (HSWA) permit until the state receives final authorization to implement the standards.

Your facility has been identified by your State Environmental Agency as being likely to receive a RCRA permit within the next year and will therefore have these conditions imposed by EPA.

The regulations will affect process vents and condenser vents on any of the following equipment that processes hazardous waste with a time weighted annual average total organics concentration of 10 parts per million by weight or greater: distillation columns, fractionation units, thin film evaporators, solvent extractors, and air or steam strippers. Also affected are any pumps, valves, compressors, pressure relief devices, sampling connection systems, and open-ended valves or lines that contain or contact hazardous waste streams with 10 percent by weight or greater total organics.

Sections 270.24 and 270.25 have been added to 40 CFR requiring facilities to notify EPA of affected units in the Part B permit application. Included in the information required is an identification and location of affected vents and equipment, the proposed method of compliance with the new standards, and documentation of compliance with the standards.

D.E.R.

OCT 29 1990

SOUTHWEST DISTRICT
TAMPA

Enclosed is a copy of the Federal Register containing the standards codified in 40 CFR Part 264 and Part 265, Subparts AA and BB. The informational requirements of 40 CFR Section 270.24 and 270.25 are also enclosed. The standards contained in 40 CFR Part 265 are applicable until the permit is issued after which the standards contained in 40 CFR Part 264 will be applicable.


This letter constitutes a formal request for the information specified in 40 CFR Sections 270.24 and 270.25. Please submit this information to this office within forty-five (45) days of receipt of this letter.

This information should be mailed to the following address:

James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
United States Environmental Protection
Agency
345 Courtland Street
Atlanta, Georgia 30365

Should you have any questions concerning the enclosed requirements, please contact Susan Zazzali of the Florida/Georgia Unit - Waste Engineering Section at (404) 347-3433.

Sincerely yours,


James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division

Enclosure

cc: Satish Kastury, FDER, Tallahassee
Bill Crawford, FDER