

Universal Waste & Transit, Inc.

Operation Permit Application

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

Volume 1

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

VOLUME 1

GENERAL FACILITY INFORMATION

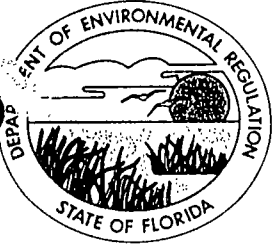
Part I	
General Information and site information	Tab 1
Operating Information	Tab 2
Waste Handling Procedures & Required Equipment	Tab 3
Process Codes	Tab 4
Traffic Patterns & Control	Tab 5
Part II General Information	
Topographic Map	Tab 6
Financial Responsibility	Tab 7
Flood Prone Areas	Tab 8
Facility Security	Tab 9
Contingency Plan	Tab 10
Safety Procedures - Power Outages	Tab 11
Loading & Unloading	Tab 12
Prevention of Personnel Exposure	Tab 13
Prevention of Water Supply Contamination	Tab 14
Run-off Prevention	Tab 15
Prevention of Ignition or Reaction	Tab 16

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HAZARDOUS WASTE
PERMITTING

Preparedness & Prevention:	Tab 17
Design & Operation	
Required Equipment	
Testing & Maintenance	
Communication & Alarms	
Required Aisle Space	
Arrangements with Local Authorities	
Personnel Training Program	Tab 18
Chemical and Physical Analysis of Hazardous Waste at Facility	Tab 19
Manifesting; Recordkeeping & Reporting	Tab 20
Operating Record & Documents Maintained	Tab 21
Containers	Tab 22
Chemical, Physical & Biological Treatment	Tab 23
Closure	Tab 24
Additional Information	Tab 25
Tanks	
Surface Impoundments	
Waste Piles	
Land Treatment	
Landfills	
Incinerators	
Thermal Treatment	
Compliance Schedule	
Groundwater Protection	
Research & Development	
Exposure Information	
Releases From Solid Waste Management Units	
Certification Statements	



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

JUN 16 1989

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

Permit Modification
Construction Permit HC29-141782

Dear Mr. Bedore:

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

<u>CONDITION</u>	<u>FROM</u>	<u>TO</u>
Expiration Date	November 23, 1989	November 23, 1990

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

Sincerely,

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

RDG/pjpb

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

INTRODUCTION

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

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

2002 Orient Road
Tampa, Florida 33619

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

- solidification

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

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

PART I - GENERAL FACILITY INFORMATION

A. GENERAL INFORMATION

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

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

The facility name and street address are indicated below:

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

The mailing address for Universal Waste & Transit. is:

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

The facility contact; operator and owner are:

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

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

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

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

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

The facility is not located on Indian land.

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

B. SITE INFORMATION

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

1. FACILITY LOCATION

County: Hillsborough

Nearest Community: City of Tampa, Florida

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

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

2. SITE AREA

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

3. TOPOGRAPHIC MAPS

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

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

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

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

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

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

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

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

4. FLOOD PLAIN

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

C. LAND USE INFORMATION

1. PRESENT ZONING

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

A building permit was obtained from Hillsborough County.

PRESENT USE

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

D. OPERATING INFORMATION

1. SIC Codes

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

9511

8734

2. DESCRIPTION OF THE FACILITY

(a.) Business Activities

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

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

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

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

(b.) Storage Facility

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

This permit application requests the following storage and treatment capacities:

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

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

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

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

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

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

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

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

(c.) Treatment Facility

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

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

(c.1) Solidification

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

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

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

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

(d.) Hazardous Waste to be Managed on Site

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

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

(e.) Estimated Annual Quantities of Hazardous Waste

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

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

The estimated quantities are as indicated below:

Annual total waste estimate:

- 377,100 gallons

(f.) Waste Handling Procedures and Equipment Required

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

1. initial contact by waste generator
2. generator required to complete and sign a Universal Waste & Transit Waste Data Sheet
3. sampling of the waste and subsequent analyses is the responsibility of the generator.
4. the completed Universal Waste & Transit Waste Data Sheet and a sample of the waste must be submitted to Universal Waste & Transit prior to waste approval, (lab packs require a complete packing list in lieu of samples)
5. analytical data reviewed by Universal Waste & Transit staff chemist
6. internal decision made as to whether the waste will be accepted at Universal Waste & Transit
7. if accepted, a date for pickup is scheduled with the generator

8. UW&T field personnel arrives at generator's site at which time all containers are inspected to insure compliance with Department of Transportation (DOT) Regulations and quality control samples are obtained.
9. if the container is unacceptable by either DOT standards or facility permit standards a decision will be made by the generator as to whether the contents will be transferred to new containers; overpacked; or left on site.
10. if visual observations of the quality control samples do not comply with the completed profile sheet (such as physical state; color change; etc.) the container will be rejected immediately.
11. all acceptable containers will be labeled and manifested in accordance with DOT regulations.
12. waste materials will be removed from the generator's site and transported via the most direct route to Universal Waste & Transit.
13. waste arrives at UW&T loading dock area.
14. containers reinspected to insure no damage in transit.

15. containers are placed in appropriate storage locations or bulk waste placed in appropriate tank
16. quality control samples are analyzed to verify Profile Sheet analyses.
17. if off-specification containers are discovered the generator will be immediately notified and the appropriate actions taken. The original manifest will be signed and returned to the generator.
18. all appropriate data will be logged onto the Universal Waste & Transit computer system.
19. approval for ultimate treatment and/or disposal will be obtained.
20. the waste will be scheduled for treatment and/or reshipment.
21. the waste material will be treated if deemed necessary.
22. all wastes will be ultimately transported to the appropriate off-site disposal facility.
23. the waste be will removed from current inventory.

(g.) Required Equipment

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

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

3. PROCESS AND PROCESS CODES

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

4. TRAFFIC PATTERNS & TRAFFIC CONTROL

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

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

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

9th Avenue to Orient Road

Right on Orient Road to S.R. 60

Right on S.R. 60 to 50th Street

Left on 50th Street to the Crosstown Expressway

All roadways are comprised of the following:

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

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

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

PART II

A. GENERAL

1. TOPOGRAPHIC MAP

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

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

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

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

2. FINANCIAL RESPONSIBILITY

A. CLOSURE COST ESTIMATE

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

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

B. POST CLOSURE COST ESTIMATE

No post closure care is required for the proposed facility.

C. LIABILITY INSURANCE

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

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

3. FLOOD PRONE AREAS

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

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

4. FACILITY SECURITY

(a.) SECURITY PROCEDURES AND EQUIPMENT

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

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

"DANGER- UNAUTHORIZED PERSONNEL KEEP OUT"

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

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

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

1B. CONTINGENCY PLAN

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

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

City of Tampa Police Department

City of Tampa Fire Department

Hillsborough County Hazardous Materials Response Team

United States Coast Guard

Westinghouse - HazTech

Humana Hospital - Brandon

Centro Espanol Memorial Hospital

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

C. SAFETY PROCEDURES, STRUCTURES AND EQUIPMENT

(1) POWER OUTAGES AND EQUIPMENT FAILURE

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

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

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

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

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

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

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

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

(2). LOADING AND UNLOADING OPERATIONS

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

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

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

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

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

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

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

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

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

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

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

(3.) PREVENTION OF PERSONNEL EXPOSURE

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

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

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

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

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

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

(4.) PREVENTION OF WATER SUPPLY CONTAMINATION

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

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

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

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

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

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

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

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

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

(5.) RUN-OFF PREVENTION

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

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

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

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

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

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

(6.) PREVENTION OF ACCIDENTAL IGNITION OR REACTION

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

As previously indicated all flammable and combustible materials will be segregated in a specially designed area. Since there are three separate containment areas within the general storage portion of the facility it is very easy to segregate incompatible materials so that no inadvertant comingling of incompatible wastes will ever occur.

All containerized wastes will be properly sealed, labeled and manifested by the generator. Upon receipt at the facility representative samples will be taken to verify the contents. Incompatible wastes will be strictly segregated in the container storage bays.

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

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

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

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

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

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

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

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

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

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

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

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

D. PREPAREDNESS AND PREVENTION

(1.) DESIGN AND OPERATION OF THE FACILITY

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

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

Use of only air operated pumps for liquid transfer

(2). REQUIRED EQUIPMENT

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

- an internal communications device which will consist of a telephone system equipped with an intercom. The intercom/telephone system is shown on the Safety Equipment Drawing (Attachment 17). Personnel will have easy access to this system regardless of their location.
- As a secondary alarm system Universal Waste & Transit will have available a number of air horns which can be manually activated in an emergency situation. These horns are located so that they are easily visible. Once again these warning horns are identified on Attachments 17.
- A complete set of emergency telephone numbers will be posted above every telephone/intercom system.
- Portable, multipurpose (ABC) fire extinguishers will be located throughout the facility and clearly identified with labels reading "Fire Extinguishers". Halon fire extinguishers are located in the flammable storage area similarly marked. All of these are identified on Attachments 17.

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

(3.) TESTING AND MAINTENANCE OF EQUIPMENT

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

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

A detailed Inspection Plan is attached to this submittal.

(4.) ACCESS TO COMMUNICATIONS OR ALARM SYSTEM

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

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

As previously stated it is company policy that at least two employees will be present before entering any active portion of the facility. The evacuation routes are indicated within the Contingency Plan.

(5.) REQUIRED AISLE SPACE

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

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

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

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

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

(6.) ARRANGEMENTS WITH LOCAL AUTHORITIES

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

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

E. PERSONNEL TRAINING PROGRAM

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

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

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

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

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

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

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

- in-depth interviews
- academic and experience requirements
- medical evaluation

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

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

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

These include:

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

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

- General safety manual
- Protective clothing guide
- Respiratory training program
- Basic emergency training guide
- Facility contingency plan
- Pocket guide to Hazardous Waste Materials
- NIOSH workers safety bulletin for hazardous waste sites

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

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

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

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

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

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

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

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

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

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

In order to comply with 40CFR Part 264.13 it will be necessary to obtain detailed analytical data on any waste material destined for the proposed facility prior to its receipt at the facility.

This information can be obtained from several sources. Those would include Material Safety Data Sheets; data obtained from waste profile sheets; or analytical data obtained from a certified laboratory. A detailed description of the procedures involved in obtaining this information is included within the Universal Waste & Transit Waste Analysis Plan included as Volume 3 of this application. A brief description of each is outlined below.

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

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

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

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

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

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

6. WASTE ANALYSIS PLAN

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

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

- Material Safety Data Sheet

- Universal Waste & Transit Request For Disposal form
- analytical data from a certified laboratory

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

- Is the facility permitted to handle the waste in question
- Is sufficient storage space available at the facility
- Can the waste be treated on site
- If on site treatment is not feasible is a suitable outlet available for the waste
- Do the physical characteristics (color, consistency, phases) match those identified on the waste profile sheet

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

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

- pH/specific ion/orp meter
- flash point tester (Pensky-Martins closed cup)
- drying oven
- associated laboratory glassware

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

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

- parameters for which hazardous waste will be analyzed
- waste analysis rational
- test methods employed
- sampling methods
- frequency of analyses
- generator supplied analytical data
- quality control samples

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

7. MANIFESTING, RECORDKEEPING AND REPORTING

A. Manifest System

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

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

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

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

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

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

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

B. Manifest Discrepancies

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

A discrepancy will be defined as follows:

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

2. OPERATING RECORD

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

1. A description, by its common name, of each waste which enters the facility.
2. The EPA/DER hazardous waste number for each of these wastes. If more than one EPA/DER number applies each will be listed.
3. The quantity of each waste.
4. The physical form of each waste (solid, liquid, semisolid, or contained gas).
5. If the waste is not a "listed waste" the description will also include the process by which the waste was generated.
6. The manifest reported weight or volume/density.
7. The methods by which the material was stored, treated or transferred off-site for disposal.

8. The dates on which this storage, treatment or transfer occurred.
9. All records and results of waste analyses.
10. Reports and details of any incident which required implementation of the Universal Waste & Transit Contingency Plan.
11. Records and results of all inspections (kept for three years only).
12. Location of each hazardous waste within the facility
13. All required notices to generators.
14. All closure cost estimates.
15. A certification statement, updated annually, that a program is in place to reduce the volume and toxicity of any hazardous waste generated.

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

3. Availability, Retention & Disposition Of Records

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

4. Documents Maintained At The Facility

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

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

5. Annual Reporting

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

6. Unmanifested Waste Reports

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

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

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

7. Additional Reports Required

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

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

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

B..CONTAINERS

1. Basic Design Parameters

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

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

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

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

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

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

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

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

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

As indicated within the Universal Waste & Transit Inspection Plan (Attachment 14), daily inspections of the sumps will be performed so as to prevent overflow of the collection system.

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

2. Requirements for Ignitable, Reactive and Incompatible Waste

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

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

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

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

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

- chemical compatibility
- hazardous waste compatibility chart
- compatibility tree

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

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

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

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

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

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

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

4. Condition of Containers

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

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

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

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

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

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

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

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

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

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

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

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

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

A list of chemical compatibilities is included as Attachment 12.

5. Inspection Procedures

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

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

6. Closure

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

J. CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT

1. General Operating Requirements

Universal Waste & Transit proposes to perform solidification at the storage and treatment facility. Solidification will be performed only when off-site land disposal is required. Our intention is to dispose of waste by burial only when no other acceptable alternative can be found. In an effort to comply with the Waste Minimization Program and the new Land Ban Restrictions, Universal Waste & Transit is attempting to reduce the volume of waste which is currently being sent out of state for land disposal by employing this solidification process. The solidification process will employ a filter press similiar to that identified in Attachment 21. The filter press will be an 800mm device having a length of 123 inches and a width of approximately 43-1/2 inches. The filter press is manufactured of structural steel and is pneumatically operated. There are no electrical components. Only low volumes of in-plant compressed air are required for operation. Leak free operation is assured. The standard gasketed, polypropylene chamber plates are center feed, four cornered discharge type that are corrosion resistant and superior in performance. The filter cloth is held in place by a caulking cord driven into a groove around the outer perimeter of the plate recess. Gaskets around the sealing surface and ports of each plate provide a leak tight seal. The process will be operated on a batch basis and no continuous feed is anticipated. The process is intended to be used on non-flammable, non-RCRA corrosive wastes and therefore, the potential for the equipment to rupture, leak, corrode or otherwise fail before the end of its intended life will be minimal.

2. Inspection Procedures

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

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

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

3. Waste Analysis and Trial Tests

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

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

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

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

4. Requirements for Ignitable or Reactive Wastes

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

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

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

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

5. Closure

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

K. CLOSURE

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

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

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

TABLE OF CONTENTS

<u>Chapter</u>	<u>Page</u>
Introduction	01
I Facility Conditions	03
A. General Information	03
B. Waste Characterization	04
C. Schedule For Final Closure	11
II Off-Site Treatment or Disposal	12
A. General Information	12
B. Flammable Liquids	13
C. Reactive/Flammable Solids	14
D. Hazardous Waste Solids/Poisons	15
E. Hazardous Waste Liquids	16
F. Corrosive Liquids	17
III Decontamination	18
IV Closure Certification	20
V Closure Cost Estimate	21
VI Trust Fund	30
VII Closure Cost Adjustment	31
Appendices	
Certification Statements - Attachments 1 & 2	

INTRODUCTION

This closure plan has been adopted in accordance with the Code of Federal Regulations, Part 264, Subpart G, including the most recent revisions as specified in the Federal Register of May 2, 1986.

Owners Name Universal Waste & Transit

Address 2002 Orient Rd.

Tampa, Florida 33619

Telephone 813-623-5302

Contact Sharon Roehm

Facility Address: 2002 Orient Rd.

Tampa, Florida

I. FACILITY CONDITIONS

A. General Information

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

<u>Process Type</u>	<u>Volume</u>
Container Storage	33,660 gallons

No other RCRA regulated facilities are located on-site.

B. Waste Characterization

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

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

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

Waste Classification:

Flammable Liquid, Combustible Liquid

Physical State Liquid

Chemical Composition

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

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

Other Pertinent Data

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

Waste Classification

Waste Poisonous Materials

Physical State Liquid/Solid/Semi-Solid

Chemical Composition

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

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

Other Pertinent Data

Disposal via treatment or land burial.

Waste Classification

Oxidizer/Reactives

Physical State Liquid/Solid

Chemical Composition

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

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

Other Pertinent Data

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

Waste Classification

Flammable Solids

Physical State Solid

Chemical Composition

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

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

Other Pertinent Data

Treated either by off-site treatment or land burial

Waste Classification

Waste Corrosive Materials

Physical State Liquid/Solid

Chemical Composition

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

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

Other Pertinent Data

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

Waste Classification

Hazardous Waste Liquid/Hazardous Waste Solid

Physical State Liquid/Semi-Solid/Solid

Chemical Composition

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

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

Other Pertinent Data

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

C. Schedule for Final Closure

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

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

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

II OFF-SITE TREATMENT OR DISPOSAL

A. General Information

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

<u>Waste Materials</u>	<u>Maximum Quantity On-Site</u>
Flammable Liquids	6,490 gallons
Oxidizers/Reactives/Flammable Solids	1,320 gallons
Poisonous Wastes	3,850 gallons
Hazardous Waste Solid	9.625 gallons
Hazardous Waste Liquid	7,975 gallons
Corrosives	4,400 gallons
Total Quantity Available for Off-Site Treatment/Disposal at Time of Closure	33,660 gallons

B. Flammable Liquids

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

Universal Waste & Transit will arrange for two 5000 gallon tankers capable of removal and transportation of flammable liquid wastes. If 3,245 gallons of liquids are placed into each tanker, it would require two tanker loads to remove all waste flammable liquids present in storage at the time of closure.

Based upon past experience, we know that we can move at least two tanker loads per day, and therefore the removal of all flammable liquid wastes at the time of closure would require no more than two (2) days of effort.

C. Oxidizer/Reactive/Flammable Solids

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

These would be disposed of as follows:

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

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

D. Hazardous Waste Solid/Poisonous Material

A large volume of the remaining wastes which are on hand at the time of closure would be disposed of via land burial at Chemical Waste Management Incorporated located in Emelle, Alabama.

Samples of these waste materials would be obtained and data submitted on a Chemical Waste Management Waste Profile Sheet.

Both samples and the completed profile sheet would be submitted to Chemical Waste Management to obtain an approval for disposal. This process generally requires 30 days from the time of sample submission.

We are estimating that 13,475 gallons of waste material could be on hand at Universal Waste & Transit at the time of closure.

This includes 9.625 gallons of hazardous waste solids; and 3,850 gallons of DOT listed poisonous waste and/or RCRA toxic wastes.

Universal Waste & Transit will arrange for two tractor trailers capable of transporting 80 drums per load to the Chemical Waste Management facility. Based upon past experience, we would

estimate that two loads per week could be transported to Alabama per truck. Therefore, a total of 2 weeks would be required for

transportation of the waste. Thus, from the time of final waste acceptance until all waste material has been removed for

disposal at Chemical Waste Management no more than 6-weeks would be required.

E. Hazardous Waste Liquids

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

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

F. Corrosive Liquids

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

These wastes would be transported to Environmental Enterprises Inc., located in Cincinnati, Ohio for treatment.

One tractor trailer would be required to transport this waste.

We estimate one week for completion of this task.

III DECONTAMINATION

The Universal Waste & Transit storage/treatment facility is totally enclosed. The facility construction is concrete, concrete block and metal and therefore no subsurface soil contamination will result during any period of the facility's operation. However, soil sampling will still be performed at four locations around the site.

All process equipment will be cleaned with water, solvent or both and the resultant liquid sent to ENSCO for incineration. We are estimating that no more than 275 gallons of liquid residue will be generated during the decontamination process. All other equipment and the floors will then be steam cleaned to insure that all residue has been removed. This liquid will be analyzed to determine its acceptability for placement into the sanitary sewer system. If the liquid waste generated from the decontamination procedure does not meet a licensed POTW discharge standards, it will be placed into tankers and transported to ENSCO for subsequent incineration. No more than 2,000 gallons of this decontamination liquid is anticipated.

All decontamination will be performed by outside contractors.

Once all liquid waste has been either transferred to a licensed POTW or transported to ENSCO for incineration, all tankers will be cleaned with water/industrial detergent and subsequently steam cleaned to insure that decontamination has occurred.

Again, this liquid will be analyzed to determine its acceptability for transport to a licensed POTW. If the first cleaning of the tanker is not acceptable to a licensed POTW it will be transported to ENSCO for incineration. This process will continue until such time as the liquid residue in the tanker meets a licensed POTW's discharge requirements. We estimate that no more than 2,000 gallons of liquid will be generated in this manner.

It is our best estimate that no more than two (2) weeks will be required to fully decontaminate all equipment and the storage facility itself.

IV CLOSURE CERTIFICATION

Universal Waste & Transit will subcontract the closure certification to a registered professional engineer licensed within the State of Florida. It is anticipated that three on site inspections by the registered professional engineer will occur during the closure period. Those inspections are indicated below:

1st. inspection: Final date of waste acceptance

2nd. inspection: Upon completion of all removal for
off-site disposal.

3rd. inspection: Upon completion of all decontamination

It is the intent of these inspections to insure that all materials are being handled in accordance with our Closure Plan. An independent analytical laboratory will perform swab sampling of the building interior and soil sampling on the building exterior. This will insure that decontamination is satisfactory, Universal Waste & Transit will submit, at the time of closure, a list of parameters for which the samples will be analyzed. Upon completion of the final inspection by the registered professional engineer, a certification that closure has been completed will be submitted to the Regional Administrator and Florida DER by both Universal Waste & Transit and the independent registered professional engineer. These certification statements are shown in Attachments 1 and 2. These certifications will be sent within 60 days of completion of closure by registered mail.

V CLOSURE COST ESTIMATE

Indicated below is our most recent closure cost estimate based upon the quantities of materials indicated in our Closure Plan and the methods indicated for treatment/disposal of those waste materials.

A. Liquid Waste for Incineration at ENSCO

9,020 gallons of non-flammable liquid waste

4,275 gallons of decontamination liquid

Total 13,295 gallons for incineration

13,295 gallons is equivalent to 3 truck loads for incineration

Based upon an average cost of \$2.73/gallon the total cost for incineration would therefore be \$36,295.35.

Transportation cost for removal and transport from Universal Waste & Transit to ENSCO is approximately:

\$1200/load or \$3,600.00 total cost.

13,295 gallons x \$2.73/gallon	=	\$36,295.35
3 x \$1200.00/load	=	<u>3,600.00</u>
Subtotal		\$39,895.00

B. Solid Materials for Land Disposal at Chemical Waste
Management in Emelle, Alabama

13,475 gallons of hazardous waste solid

This volume of waste can be transported in three truckloads to
CWM.

13,475 gallons at disposal cost of \$1.09/gallon = \$14,687.75

Transportation cost at \$1200/truckload = 3,600.00

Subtotal for CWM \$18,287.75

C. Treatment of Corrosive Liquids at Environmental
Enterprises, Cincinnati, Ohio

This treatment will include the following:

4,400 gallons of corrosive liquid

This volume of waste can be transported in one truckloads.

The average cost of corrosive waste treatment at Environmental Enterprises is \$1.05/gallon.

Based upon 4,400 gallons at \$1.05/gallon a total cost for treatment of corrosive liquids would be \$4,620.00.

Transportation cost per truckload would be \$1,200.00.

The total cost for transportation and disposal of corrosive liquids at EEI would be \$6,120.00

D. Treatment of Reactive Waste at BDT in New Jersey

This small quantity of waste materials will be transported to BDT in New Jersey for treatment. Approximately 275 gallons could be at the facility during closure.

275 gallons at a treatment cost of \$6.00/gallon = \$1,650.00

Transportation of 275 gallons at a cost of \$2.00/gal 550.00

Total Transport and Treatment Cost \$2,200.00

E. Recycle/Incineration of Flammable Wastes at Oldover Corp. or International Solvent

An estimated 6,490 gallons of flammable liquid could be on hand at the time of closure. These materials would be sent to either Oldover Corp. or International Solvent for recycle or incineration. Two truckloads would be necessary for transport to these facilities.

Based upon past experience our worst case disposal cost estimate for this waste material would be about \$.50/gallon.

6,490 gallons x \$.50/gallon	=	\$3,245.00
2 truckloads x \$500/load	=	<u>1,000.00</u>
Total cost for disposal	=	\$4,245.00

F. Decontamination

All decontamination of the facility, equipment, and vehicles will be in accordance with our Closure Plan. It is estimated that no more than \$1,000 would be required to insure complete decontamination. Removal and disposal costs for decontamination have already been accounted for separately. All labor costs are indicated in a subsequent section.

G. Professional Engineer Certification

The cost for certification by a registered professional engineer visiting the facility three times and certifying that closure is in accordance with the Universal Waste & Transit Closure Plan is estimated at no more than \$2,000.

H. Labor

It is our estimate that approximately 400 hours of labor will be required to insure that closure is completed as indicated in the Universal Waste & Transit Closure Plan. At an average rate of \$10/hour, this cost is \$4,000. It should be noted that all cost for transportation related labor have been previously addressed.

I. Closure Cost Summary

Liquid Waste Incineration	\$ 39,895.35
Land Disposal at CWM	18,287.75
Corrosive Liquid Treatment	6,120.00
Reactive Treatment	2,200.00
Flammable Liquid Incineration	4,245.00
Decontamination	1,000.00
Certification	2,000.00
3rd Party Administration & Overhead Cost	6,000.00
Labor	<u>4,000.00</u>
TOTAL CLOSURE COST	\$ 83,748.10

VI TRUST FUND

An irrevocable trust fund will be instituted in the amount of \$83,748.10. Payments to the trust fund will be made annually during the term of the permit or over the estimated life of the facility. The first payment will be made prior to receipt of any waste at the facility. Subsequent payments will be made within 30 days of the anniversary of the first payment.

VII CLOSURE COST ADJUSTMENT

This closure cost estimate will be adjusted within 30 days after each anniversary of the date of permit issuance. The adjustment will be made by multiplying this closure cost estimate by the inflation factor. Subsequent adjustments will be made by multiplying the most recent closure cost estimate by the latest inflation factor.

ATTACHMENT 2

I, _____, of
owner or operator

Name and address of hazardous waste facility

hereby state and certify that, to the best of my knowledge and belief,
the above named hazardous waste facility has been closed in accordance
with the attached approved closure plan, and that the closure was
completed on the ____ day of _____, 19__.

signature

date

ATTACHMENT 3

I, _____, a
certified professional engineer, hereby certify, to the best of my
knowledge and belief, that I have verified that Professional Engineer
Closure Certificates were issued for all prior closure activities at
_____ and
hazardous waste facility
that I have made visual inspection(s) of the aforementioned facility,
and closure of the aforementioned facility has been performed in
accordance with the closure plan for the facility approved by the
Regional Administrator for Region _____ of the United States
Environmental Protection Agency.

signature

date

State Professional Engineer License No., issued by the State of

business address and telephone number

C. TANKS

No tank storage is requested in this application.

D. SURFACE IMPOUNDMENTS

No surface impoundments are proposed at this facility.

E. WASTE PILES

No waste piles will be present at this proposed facility.

F. LAND TREATMENT

No land treatment of hazardous waste will be performed at this facility.

G. LAND FILLS

No land fills or land disposal will be performed at this facility or on the property upon which this facility is located.

H. INCINERATORS

No incineration will be performed at this facility.

I. THERMAL TREATMENT

No thermal treatment will be performed at this facility.

L. COMPLIANCE SCHEDULE

No compliance schedule is requested in this application.

M. GROUND WATER PROTECTION

As required in 40CFR Part 264 Subpart F, Universal Waste & Transit believes it is exempt from these regulations as specified in Paragraph 264.90 (b) (2)(iii). As previously described this facility has been designed to exclude liquid precipitation and other means of run-on and run-off. Universal Waste & Transit however, has installed several monitoring wells (one up-gradient and one down-gradient) at the facility as indicated in Attachment 15. These wells will be monitored on an annual basis and the data included within the facility Operating Record.

N. RESEARCH, DEVELOPMENT AND DEMONSTRATION

No research, development and demonstration is anticipated at this facility.

O. EXPOSURE INFORMATION

No surface impoundment or landfill is proposed at this facility.

P. RELEASES FROM SOLID WASTE MANAGEMENT UNITS

No previous, present or proposed releases from solid waste management units have occurred or are anticipated at this facility. The completed form, however, has been signed and certified and is included as Attachment 2 to this document.

Q. CERTIFICATION STATEMENTS

The certifications for operator; facility owner; landowner; and professional registered engineer are included with Attachment 2 of this document.