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March 13, 1995

Mr. J. Knox McKee, Jr.
Florida Department of Environmental Protection
1900 South Congress Avenue, Suite A
West Palm Beach, FL 33406

RE: Operating Permit Modifications, Safety-Kleen Corp., Medley, Florida; FLD 984171694

Dear Mr. McKee:

Safety-Kleen Corp. (Safety-Kleen) has reviewed its current operations and determined that it is appropriate to manage nonhazardous spent ethylene glycol by commingling with used oil. Under hazardous conditions, the spent ethylene glycol may be handled in containers. The waste stream of spent ethylene glycol will no longer be accumulated and stored in the 20,000-gallon tank. The appropriate pages of the permit application have been revised to reflect managing this waste stream as described above.

The tank was permitted to hold spent ethylene glycol but never held any waste product. Currently, a small amount of water from the hydrostatic testing procedure exists in the tank. Per discussions between you and Jon Ercole, no decontamination of the tank is required. The tank will be designated as a 20,000-gallon product tank.

Updates to the emergency contact list have also been made and are included herein.

Table 1 provides instructions for updating the permit application. Two copies of the replacement pages are enclosed. Additional copies are being provided under separate cover to FDEP Tallahassee and Environmental Protection Agency (EPA) Region IV. Also enclosed is the required \$500 modification fee.

If you have any questions or comments, please do not hesitate to contact Jon Ercole at (407) 734-2560.

Sincerely,



Al Seyfer
Regional Sales Manager

pjh/bai

Enclosure(s)

13112.21/01/KM031395.LTR/2

Mr. J. Knox McKee, Jr.

March 13, 1995

Page -2-

c: Jeffrey Grill - ERM
Cynthia Norton - ERM (letter only)

Chief, Waste Management Division
U.S. EPA Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365


Environmental Administrator
Hazardous Waste Regulation Section
Bureau of Solid and Hazardous Waste
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

TABLE 1
INSTRUCTIONS FOR UPDATING THE
OPERATING PERMIT APPLICATION
MEDLEY, FLORIDA
FLD 984171694

Replace the following pages:

I.B.3-1
Figure I.B.3-1
I.D.2-5
I.D.3-1A
Figure II.A.1(a)-4
II.A.1(c)-1
Figure II.A.1(c)-1
II.A.4(b)iii
II.A.4(b)-1
II.A.4(b)-2
II.A.4(b)-3A
Figure II.A.4(b)-5
II.A.5-3
II.A.5-7
II.A.6-7
II.A.6-8
II.A.6-9A
II.A.6-9B
II.A.6-9C
II.A.6-9D
II.B.3-1
II.C.1-1
II.C.2 (Replace all text pages)
Figure II.C.2-1
Figure II.C.7-1
II.C.9-1
II.C.9-2
II.K.1-1
II.K.1-2
Attachment II.K.1 - Closure Cost Estimate Pages 1, 2, 3, and 6
II.S.1-1
Figure - Attachment II.S.1 - Safety-Kleen Environmental Piping Schematic - Existing

This is to certify that the modifications incorporated on this list have been examined by me and found to conform to engineering principles applicable to such facilities.


Robert W. Fox, P.E. 3/13/15
License No. 40980

ATTACHMENT I.B.3

FACILITY LAYOUT AND PHOTOGRAPHS

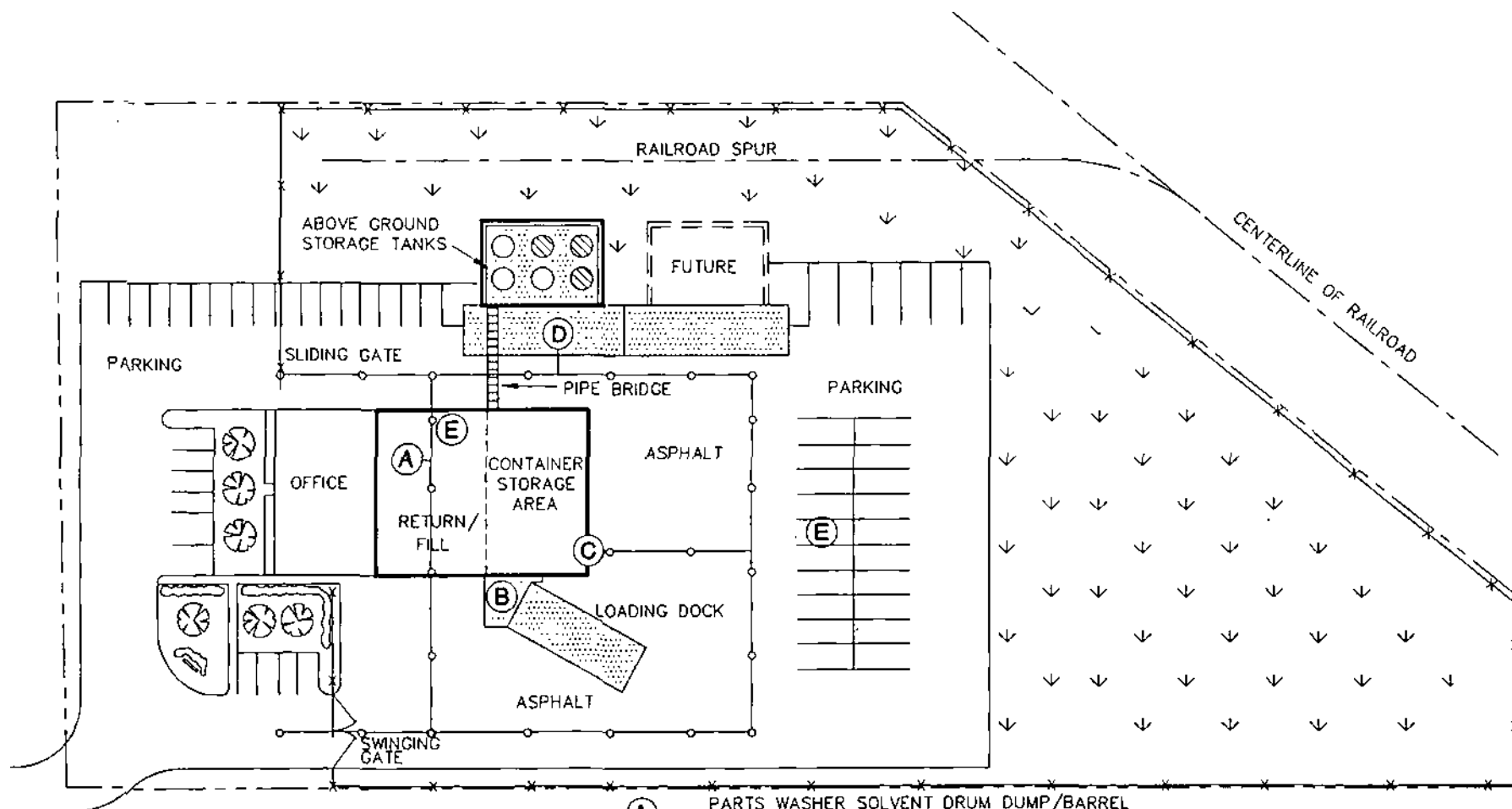
The service center (i.e., facility) layout and traffic patterns are illustrated in Figure I.B.3-1.

The non-building areas of the facility are paved with asphalt or concrete as noted on the site plan. The stormwater retention areas and other unpaved areas are vegetated with grass. The majority of the vehicular traffic and loading/unloading operations occurs at and near the return and fill (area A) which is paved with asphalt and concrete. Approximately once per week a tractor trailer brings fresh containerized solvents and removes used, containerized solvents for transfer to a recycle facility. This truck backs up to the concrete dock, located on the southeastern side of the facility in area B, to load and unload containers. Area C is used for the loading/unloading of transfer wastes, and containerized permitted wastes from local area vans and trucks. The trucks dispatched from the recycle center to deliver parts washer solvent and pick up used parts washer solvent will perform these activities at the aboveground tank truck loading area (Area D) approximately once per week. Truck to truck transfer of Fluid Recovery Service (FRS) (transfer) wastes may occur on any asphalt or concrete surfaces within the compound (Area E). Tank truck to tank truck transfer of ethylene glycol may also occur in Area E.

U.S. 27, Okeechobee Road, is the major access road to the facility. The access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the heavy industrial activities in this area. The vans that travel the routes daily between the service center and Safety-Kleen customers use the two-lane road within the industrial park. Traffic from this facility will have a minor impact on local traffic conditions.

Photographs which depict the hazardous waste management units, security features, and general layout of the facility are provided.

Figure I.B.3-1
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



LEGEND

- PROPERTY BOUNDARY
- x-x- CHAIN-LINK FENCE
- HAZARDOUS WASTE MANAGEMENT AREAS
- CONCRETE
- ENTRANCE/EXIT ROUTE
- GRASS
- FUTURE TANK

- (A) PARTS WASHER SOLVENT DRUM DUMP/BARREL WASH/REFILL
 - (B) LOADING & UNLOADING OF DRUMS CONTAINING SOLVENTS FROM TRUCKS
 - (C) LOADING & UNLOADING OF CONTAINERIZED WASTE FROM LOCAL AREA VANS & TRUCKS
 - (D) LOADING & UNLOADING OF PARTS WASHER SOLVENT
 - (E) TRUCK TO TRUCK TRANSFER OF FRS (TRANSFER) WASTES AND TANK TRUCK TO TANK TRUCK TRANSFER OF ETHYLENE GLYCOL
- NOTE: THIS OCCURS ON ANY ASPHALT OR CONCRETE SURFACE EAST, NORTH OR SOUTH OF THE WAREHOUSE OR IN THE RETURN/FILL SHELTER



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center for processing. The filters from the Actrel® system will contain approximately the same constituents as dumpster mud.

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. These wastes are deposited into a carboy or containers by the customer, which are located on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck and combined with used oil. The contents of the carboy, if hazardous, are pumped into 30- or 55-gallon containers. A Safety-Kleen sales representative conducts the pumping of the contents of the carboy. At the service center, it is placed in the container storage warehouse or transferred from tanker truck to tanker truck and held for shipment to a Safety-Kleen recycle center.

Safety-Kleen also collects used oil filters and oily water. These materials are generally not hazardous wastes. The used oil and oily water may be managed in either drums or bulk tanks.

**TABLE I.D.3-1
SAFETY-KLEEN CORP.
MEDLEY, FLORIDA
PART 1 ATTACHMENT**

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	813	D001 and D-Codes Listed in Note Below
Dumpster Sediment	S01**	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01**	Included Above	D001 and D-Codes Listed in Note Below
Hazardous Spent Ethylene Glycol	S01**	5,000	D-Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula) IC609	S01****	28	F002, F004, and D-Codes Listed in Note Below
Spent Immersion Cleaner (New Formula) IC699	S01**	Included Above	D-Codes Listed in Note Below
Dry Cleaning Waste (Perchloroethylene)	S01**	350	F002 and D-Codes Listed in Note Below
Dry Cleaning Waste (Non-perchloroethylene)	S01****	Included Above	D001 or F002 and D-Codes Listed in Note Below
Paint Waste	S01**	69	D001, F003, F005 and D-Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01****	250	D001, D002, and D-Codes, F-Codes, K-Codes, and U-Codes Listed in Note Below

NOTES:

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

F-Codes: F001, F002, F003, F004, F005, F006, F019, F024, F039

K-Codes: K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K009, K010, K011, K013, K014, K015, K002, K003, K004, K005

U-Codes: U001, U002, U003, U009, U031, U037, U043, U044, U051, U052, U055, U056, U057, U068, U069, U070, U071, U072, U075, U077, U078, U079, U080, U083, U084, U107, U108, U110, U112, U113, U117, U118, U121, U125, U140, U154, U159, U161, U162, U165, U169, U171, U188, U191, U196, U210, U211, U213, U220, U226, U227, U228, U239, U359

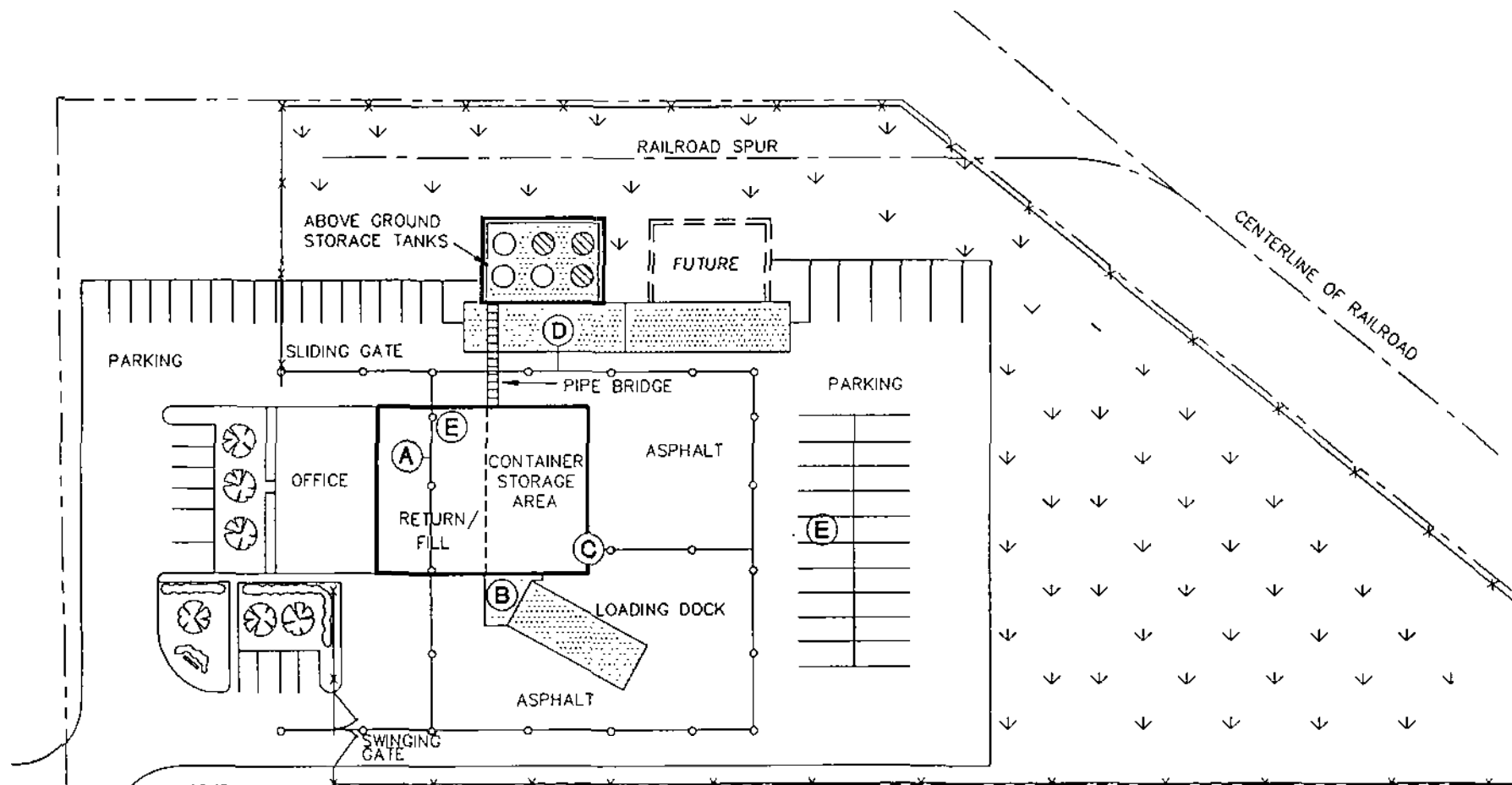
* Spent Parts Washer 105 and Actrel® are transported from the customer to the Service Center as a hazardous waste unless the generator's hazardous waste determination indicates that it is non-hazardous. Spent Premium Solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11.

** These wastes will be stored in containers in the container storage area. The maximum drum capacity in the container storage area for hazardous waste and product is 29,400 gallons with 6,912 gallons being waste.

*** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

**** These wastes are transfer wastes.

Figure II.A.1(a)-4
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



LEGEND

- PROPERTY BOUNDARY
- *-*-* CHAIN-LINK FENCE
- HAZARDOUS WASTE MANAGEMENT AREAS
- CONCRETE
- ENTRANCE/EXIT ROUTE
- GRASS
- FUTURE TANK

- (A) PARTS WASHER SOLVENT DRUM DUMP/BARREL WASH/REFILL
 - (B) LOADING & UNLOADING OF DRUMS CONTAINING SOLVENTS FROM TRUCKS
 - (C) LOADING & UNLOADING OF CONTAINERIZED WASTE FROM LOCAL AREA VANS & TRUCKS
 - (D) LOADING & UNLOADING OF PARTS WASHER SOLVENT
 - (E) TRUCK TO TRUCK TRANSFER OF FRS (TRANSFER) WASTES AND TANK TRUCK TO TANK TRUCK TRANSFER OF ETHYLENE GLYCOL
- NOTE: THIS OCCURS ON ANY ASPHALT OR CONCRETE SURFACE EAST, NORTH OR SOUTH OF THE WAREHOUSE OR IN THE RETURN/FILL SHELTER



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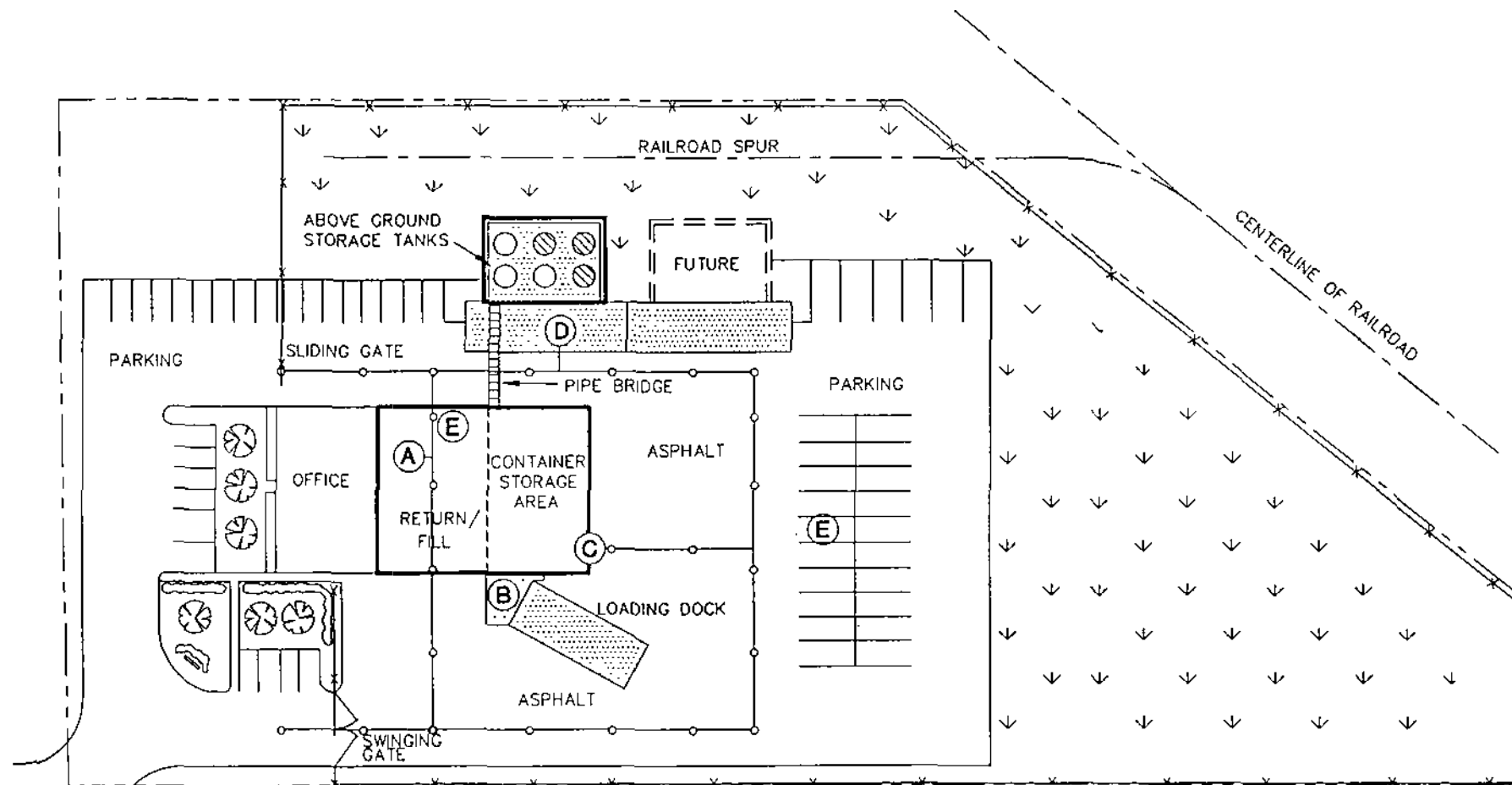
ATTACHMENT II.A.1(c)
TRAFFIC INFORMATION

The service center (i.e., facility) layout and traffic patterns are illustrated in Figure II.A.1(c)-1.

The non-building areas of the facility are paved with asphalt or concrete as noted on the site plan. The stormwater retention areas and other unpaved areas are vegetated with grass. The majority of the vehicular traffic and loading/unloading operations occurs at and near the return and fill (area A) which is paved with asphalt and concrete. Approximately once per week a tractor trailer brings fresh containerized solvents and removes used, containerized solvents for transfer to a recycle facility. This truck backs up to the concrete dock, located on the southeastern side of the facility in area B, to load and unload containers. Area C is used for the loading/unloading of transfer wastes, and containerized permitted wastes from local area vans and trucks. The trucks dispatched from the recycle center to deliver fresh parts washer solvent and pick up used parts washer solvent will perform these activities at the aboveground tank truck loading area (Area D) approximately once per week. Truck to truck transfer of Fluid Recovery Service (FRS) (transfer) wastes may occur on any asphalt or concrete surfaces within the compound (Area E). Tank truck to tank truck transfer of ethylene glycol may also occur in Area E.

U.S. 27, Okeechobee Road, is the major access road to the facility. The access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the heavy industrial activities in this area. The vans that travel the routes daily between the service center and Safety-Kleen customers use the two-lane road within the industrial park. Traffic from this facility will have a minor impact on local traffic conditions.

Figure II.A.1(c)-1
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



LEGEND

- — — — — PROPERTY BOUNDARY
- x — x — CHAIN-LINK FENCE
- — — — — HAZARDOUS WASTE MANAGEMENT AREAS
- ▒ CONCRETE
- o — o — ENTRANCE/EXIT ROUTE
- ↓ ↓ GRASS
- ⊘ FUTURE TANK

- (A) PARTS WASHER SOLVENT DRUM DUMP/BARREL WASH/REFILL
- (B) LOADING & UNLOADING OF DRUMS CONTAINING SOLVENTS FROM TRUCKS
- (C) LOADING & UNLOADING OF CONTAINERIZED WASTE FROM LOCAL AREA VANS & TRUCKS
- (D) LOADING & UNLOADING OF PARTS WASHER SOLVENT
- (E) TRUCK TO TRUCK TRANSFER OF FRS (TRANSFER) WASTES AND TANK TRUCK TO TANK TRUCK TRANSFER OF ETHYLENE GLYCOL

NOTE: THIS OCCURS ON ANY ASPHALT OR CONCRETE SURFACE EAST, NORTH OR SOUTH OF THE WAREHOUSE OR IN THE RETURN/FILL SHELTER



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EMERGENCY PHONE NUMBERS

Emergency Coordinators

Primary:	Juan Formoso	Alternate:	Peter Ciocio
	9440 SW 55th Street		1909 NW 89th Terrace
	Miami, FL 33165		Coral Springs, FL 33071
	Home: (305) 595-8290		Home: (305) 341-4018
	Office: (305) 884-0123		Office: (305) 884-0123
	Beeper: (305) 737-4482		Beeper: (305) 827-1932

Emergency Notification Phone Numbers

Safety-Kleen Environment, Health and Safety Department
Telephone (708) 888-4660 (24-hour number)

National Response Center, Telephone (800) 424-8802

FDEP Southeast District, 1900 South Congress Avenue, West Palm Beach, FL 33406
Telephone (407) 433-2650 (Monday - Friday, 8 a.m. - 5 p.m., except holidays).
At all other times call the Florida Department of Emergency Management

Florida Department of Emergency Management
Telephone (904) 488-1320 (during non-FDER-SE business hours)

Dade County Environmental Resources Management, Mr. Mike Graham
Telephone (305) 375-3376 (24-hour)

Emergency Team to be Notified

Metro Dade Fire Department	O.H. Materials Company
8175 NW 12th Street	P.O. Box 551
Miami, FL 33126	Findlay, OH 45839-0551
(305) 470-1760 or 911	(800) 537-9540
	(Primary Cleanup Contractor)

Medley Police Department	Ryckman's Emergency Action and
7331 NW 74th Street	Consulting Team
Medley, FL 33166	2208 Welsch Industrial Court
(305) 887-9541 or 911	St. Louis, MO 63146
	(800) 325-1398
	(Secondary Cleanup Contractor)

AMI Palmetto General Hospital
2001 West 68th Street
Hialeah, FL 33016
(305) 823-5000

ATTACHMENT II.A.4(b)

PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND
EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS
SAFETY-KLEEN CORP., MEDLEY, FLORIDA

GENERAL INFORMATION

Purpose

The preparedness, prevention, and contingency plan and emergency procedures are designed to ensure that Safety-Kleen reduces the possibility of emergency situations and, should they occur, respond in a manner to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous material constituents to the air, soil, surface water, or ground water at the facility.

The provisions of the plan are to be carried out immediately if there is a fire, explosion, or release of hazardous materials that could threaten human health or the environment. All responses must conform with the procedures contained in this plan.

General Description of Activities

The business activities conducted at the Medley Service Center relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provisions of a solvent leasing service for the customers. Clean solvents are distributed from, and the used solvents returned to, the service center, where separate storage tanks are utilized for the storage of clean and used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®).

There is one 20,000-gallon clean solvent storage tank and one 20,000-gallon product tank at this time. These tanks may store any of the clean parts washer solvents (Parts Cleaner 105, Premium Solvent, or Actrel®). Warehouse space is designated for the storage of containers of both clean and used immersion cleaner, used parts washer solvent sludge, antifreeze, paint waste, fluid recovery service (FRS) wastes, dry cleaning wastes (chlorinated solvent), and used oil. Safety-Kleen uses a container color scheme as part of its waste management system. Eighty-five gallon overpack containers are utilized for the management of containers whose integrity has been compromised.

The parts washer solvents are transported in covered containers between the service center and customers. Upon returning to the service center, the used parts washer solvents (Parts Cleaner 105, Premium Solvent, and Actrel®) are transferred from the containers into a wet dumpster/ barrel washer (solvent return receptacle) in which coarse solids in the parts washer solvents are retained. Used parts washer solvent (Parts Cleaner 105,

Premium Solvent, and Actrel®) from the wet dumpster flows into a 20,000-gallon aboveground tank for storage. Used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers clean parts washer solvent. The sludge in the wet dumpster is cleaned out at least once per working day, containerized in satellite accumulation drums next to the wet dumpster units, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation. Satellite accumulation of parts washer solvent occurs in the return/fill area. These satellite accumulation points are associated with the operation of the dumpsters.

The immersion cleaner remains in covered containers at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the service center. Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers and stored temporarily at the service center. The containers are picked up periodically for recycling at the recycle facility. Immersion Cleaner #609 is managed as a transfer waste and may be stored onsite for up to 10 days.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms. The still bottoms, powder residue, and filters are packaged on the customer's premises in containers. All containers are DOT-approved. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

The antifreeze waste is approximately two-thirds water and one-third antifreeze (ethylene glycol) and contaminants. These wastes are deposited into a carboy by the customer, which are located on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck by a Safety-Kleen sales representative. At the service center, the tanker truck may transfer its waste to another tanker truck. Tanker truck to tanker truck transfers of waste antifreeze are conducted at the return/fill shelter or on any asphalt or concrete surface. Hazardous spent antifreeze is handled in containers. The containerized waste is placed in the container storage area prior to shipment to a reclamation facility.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in the container storage area of the warehouse.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes),

**TABLE II.A.4(b)-1
SAFETY-KLEEN CORP.
MEDLEY, FLORIDA
PART 1 ATTACHMENT**

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	813	D001 and D-Codes Listed in Note Below
Dumpster Sediment	S01**	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01**	Included Above	D001 and D-Codes Listed in Note Below
Hazardous Spent Ethylene Glycol	S01**	5,000	D-Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula)	S01**	28	F002, F004, and D-Codes Listed in Note Below
Spent Immersion Cleaner (New Formula)	S01**	Included Above	D-Codes Listed in Note Below
Dry Cleaning Waste	S01**	271	D001 or F002 and D-Codes Listed in Note Below
Paint Waste	S01**	69	D001, F003, F005 and D-Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01****	250	D001, D002, and D-Codes, F-Codes, K-Codes, and U-Codes Listed in Note Below

NOTES:

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

F-Codes: F001, F002, F003, F004, F005, F006, F019, F024, F039

K-Codes: K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K009, K010, K011, K013, K014, K015, K002, K003, K004, K005

U-Codes: U001, U002, U003, U009, U031, U037, U043, U044, U051, U052, U055, U056, U057, U068, U069, U070, U071, U072, U075, U077, U078, U079, U080, U083, U084, U107, U108, U110, U112, U113, U117, U118, U121, U125, U140, U154, U159, U161, U162, U165, U169, U171, U188, U191, U196, U210, U211, U213, U220, U226, U227, U228, U239, U359

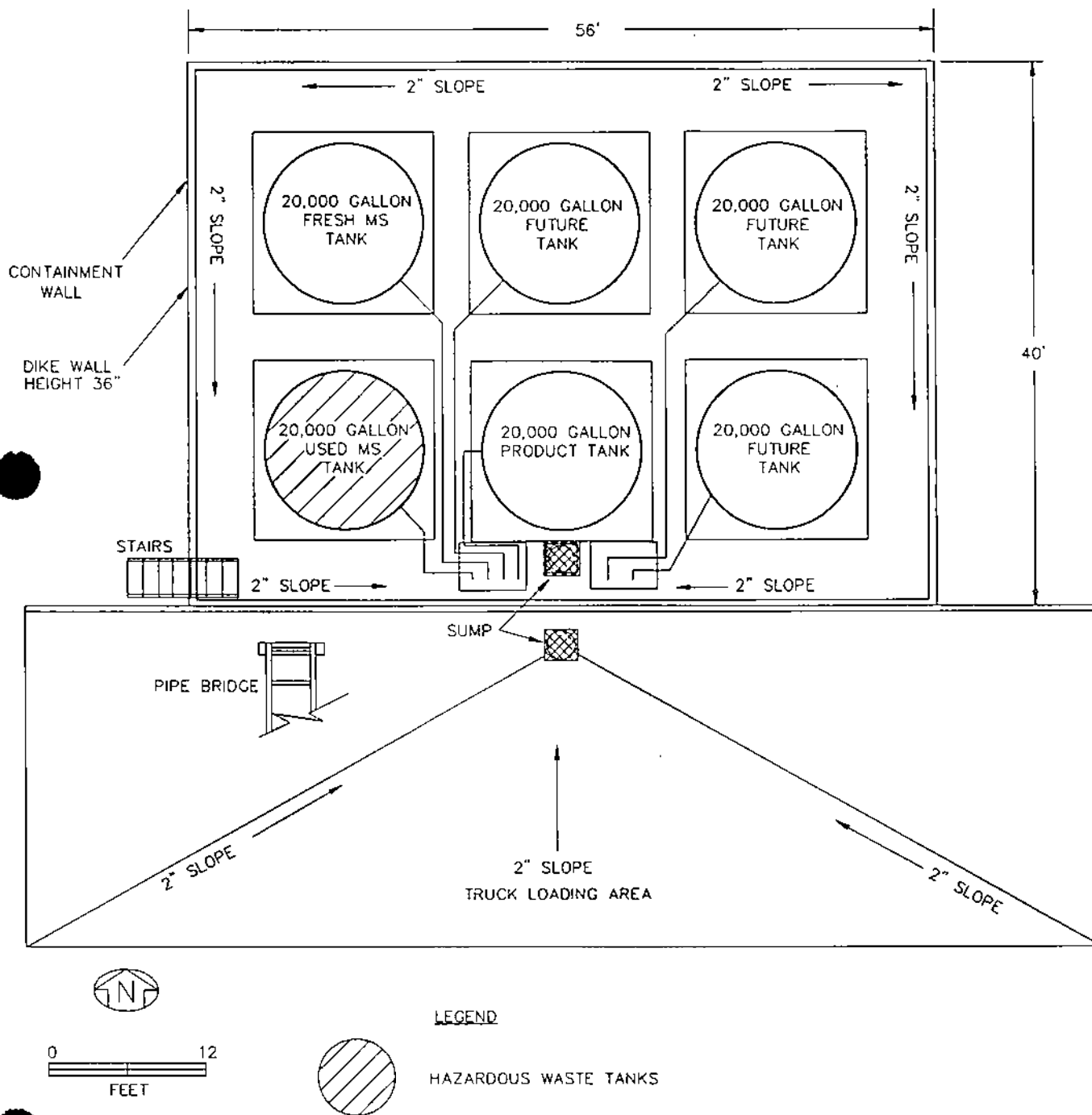
* Spent Parts Washer 105 and Actrel® are transported from the customer to the Service Center as a hazardous waste unless the generator's hazardous waste determination indicates that it is non-hazardous. Spent Premium Solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11.

** These wastes will be stored in containers in the container storage area. The maximum drum capacity in the container storage area for hazardous waste and product is 29,400 gallons with 6,912 gallons being waste.

*** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

**** FRS wastes are transfer wastes only.

**Figure II.A.4(b)-5
Tank Farm
Safety-Kleen Corp. Facility
Medley, Florida**



LEGEND

HAZARDOUS WASTE TANKS

NOTE: ENTIRE AREA IS CONCRETE

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6. Antifreeze waste is approximately two-thirds water with the remaining third being antifreeze (ethylene glycol) and contaminants. As a protective measure, the ~~containers~~ storage area for spent antifreeze will be permitted to store wastes with the following TCLP waste codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.
7. Paint wastes will consist of various lacquer thinners such as acetone, isopropyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, toluene, xylenes, and acetate compounds (D001, F003, and F005) and is a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The waste will be collected in containers at the customer's place of business and the containers will then be palletized whenever possible and stored in the paint waste storage area of the accumulation center.
8. Due to the great variability in the composition of Fluid Recovery Service (FRS) wastes, their application or use, and the source industry, Safety-Kleen characterizes each stream from each generator separately. FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility under the FRS program. These wastes, except characteristic waste oil, are shipped in containers and are stored on pallets. The FRS wastes are handled as transfer wastes only.

A typical composition, and chemical physical analysis for each of the waste streams (except FRS) listed above are shown in the attached chemical analyses reports, based on existing data on these wastes generated from similar processes within Safety-Kleen's current and/or potential customers.

materials (still residues) are in liquid form and consist of primarily detergent, oil and grease, vinyl acetate (a sizing compound), and 20 to 30 percent of solvent.

ANTIFREEZE COLLECTION SERVICE

The spent antifreeze (ethylene glycol) is collected from automobile service stations. These wastes are deposited into a carboy or containers by the customer, on the customer's premises.

The contents of the carboy, if nonhazardous, are pumped into a tanker truck and combined with used oil. The contents of the carboy, if hazardous, are pumped into 30- or 55-gallon containers. A Safety-Kleen sales representative conducts the pumping of the contents of the carboy. At the service center, it is placed in the container warehouse or transferred from tanker truck to tanker truck and held for shipment to a Safety-Kleen Recycle Center.

PAINT WASTES

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in the container storage area of the warehouse.

FLUID RECOVERY SERVICE WASTES

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Service Centers. Under this program, used products similar to the fresh products provided by Safety-Kleen are collected by the service center and processed by the recycle centers. These products may or may not have been originally obtained from Safety-Kleen by the industrial customer. These wastes are handled as transfer wastes at the service center. Examples of the types of wastes that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, and naphtha, etc.
2. Lubricating, hydraulic oils, and machine oils.
3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, freon, and trichloroethane.

Lacquer Thinner Waste

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in five-gallon pails. The paint gun cleaning machine operates as a closed system whereby there should never be a combined volume of more than 7.5 gallons of solvent in the two collection pails. The solvent is pumped from a tube in a left hand pail (facing the machine) through the machine into a right hand pail. The tube in the left hand pail extends exactly half way into the pail (i.e., to the 2.5 gallon mark). The left hand pail starts with five gallons of clean solvent which will be pumped out as the machine is used to clean the spray guns. This process will continue until the left hand pail contains 7.5 gallons of solvent. Any solvent above 7.5 gallons remaining in the left hand pail at the time of servicing will be pumped through the machine into the right hand pail by the Safety-Kleen service representative. Therefore, when the machine is serviced, the right hand pail will always contain five gallons of solvent. If a service representative discovers more than a total of 7.5 gallons of solvent in the two pails or there is an overfill from the right hand pail, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

Paint Waste

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative will insert a three-foot-long glass tube into the container. The tube should glide easily down to the bottom of the container. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the three-foot tube (the water and paint will separate in the tube and thus can be measured), the waste will be rejected.

Antifreeze Waste

Spent antifreeze is collected in carboys or containers at a customer's place of business until it is picked up by Safety-Kleen. ~~Nonhazardous spent antifreeze is pumped into a tanker truck.~~

and hazardous spent antifreeze is handled in containers. Prior to transferring the spent antifreeze into the tanker truck or container, the Safety-Kleen service representative is responsible for visually inspecting the waste. Spent antifreeze is typically yellowish green to blue in color with traces of orange, red, or black discoloration due to ferric oxide (i.e., rust). A slight sheen may be present on the surface of the spent antifreeze due to the presence of oils or other petroleum products. Sediment (brownish or black) may collect in the carboy due to particulate matter from vehicle engines, rust, dirt, or other matter.

If the spent antifreeze does not meet the criteria described above, the Safety-Kleen service representative may collect a sample of the waste for analysis or request that the customer analyze the waste.

ONSITE ENVIRONMENTAL ACTIVITY REVIEW PROGRAM

Based on historical operating and analytical records, Safety-Kleen has determined that the characteristics of its customer's wastes (particularly the last 10 years) reflect that there has, in fact, been a continuing reduction in the trace levels of characteristically toxic constituents in these wastes. Therefore, in concert with the sampling described in this waste analysis plan, Safety-Kleen may conduct reviews of customer's waste streams. This review, in addition to the analytical baseline of information, will confirm that the hazardous waste streams managed at the Service Centers under conditions of the Part B Permit do not change from year to year. Annual process descriptions may be performed for Large Quantity Generators (LQGs) and Small Quantity Generators (SQGs) that generate these wastes.

If a review occurs, it will be performed at the customer's site by the Safety-Kleen sales representative during their regular service calls. The Safety-Kleen representative will meet with a customer representative who is knowledgeable of the Safety-Kleen services used at the facility. The Safety-Kleen representative will conduct an inspection of the facility and interview the customer. The inspection and interview will be used to generate: a description of the customer's processes, an inventory of waste streams, the principal product(s) or service(s), and the purpose for which Safety-Kleen solvents are used. This information will be used to complete a review document which will be certified and signed by the customer's representative and the Safety-Kleen representative. A copy of the completed review document will be kept on file at the Service Center and copy will be provided to the customer.

**TABLE II.A.6-1
PARAMETERS AND RATIONALE
FOR HAZARDOUS WASTE IDENTIFICATION**

Hazardous Waste	Parameter^a	Rationale
1. Used Immersion Cleaner (699IC)	TCLP	May contain these compounds
2. Used Parts Washer Solvent	Flash Point TCLP	Ignitable characteristics D001; may contain these compounds
3. Parts Washer Solvent Tank Bottom Sludge and Free Water	TCLP Flash Point	The sludge and free water may contain these compounds and the sludge has a flash point of 105° F (D001)
4. Parts Washer Solvent Dumpster Mud	TCLP Flash Point	The sludge and free water may contain these compounds and the sludge has a flash point of 105° F (D001)
5. Dry Cleaning Wastes	Perchloroethylene TCLP	Contain ingredient of F002 or contains a hazardous constituent. Perchloroethylene formula is the only waste managed as a permitted waste.
6. Paint Wastes	Toluene, Xylene, Methyl ethyl ketone, Methyl isobutyl ketone, Acetone, Isopropanol, Methanol, Ethanol, Normal butyl acetate, Isobutyl acetate, Cadmium, Chromium, Lead	Contains these components: F003, F005, D001, D006, D007, and D008
7. Hazardous Spent Antifreeze	TCLP	May contain these compounds

FOOTNOTE:

^a TCLP Waste Codes: D004-D011, D018, D019, D021-D030, D032-D043.

TABLE II.A.6-2
PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference
pH	pH Meter	EPA 9045/SK9906
Flash Point	Tag closed cup tester	EPA 1030/SK9401
TCLP	Toxicity Characteristic Leaching Procedure	40 CFR 261, Appendix II
Hydrocarbons and Volatile Organics	Gas Chromatography (GC)	Modified Methods Based on "Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods," SW-846, USEPA and ASTM Standards
Specific Gravity	Meter	ASTM D 891/SK9903

TABLE II.A.6-3

METHODS USED TO SAMPLE HAZARDOUS WASTES

Hazardous Waste	Reference for Sampling	Sampler	Description of Sampling Method
1. Used Immersion Cleaner (6991C)	Sampling a drum "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods, SW-846, USEPA	Representative composite sample using drum sampler
2. Used Parts Washer Solvent	Sampling a tank "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Same as 1	For tanks—Bomb sampler (similar to weighted bottle sampler)
3. Parts Washer Solvent, Tank Bottom Sludge, and Free Water	Same as 2	Same as 2	Same as 2
4. Parts Washer Solvent Dumpster Mud	Same as 1	Same as 1	Same as 1
5. Dry Cleaning Wastes	Same as 1	Same as 1	Same as 1
6. Paint Wastes	Same as 1	Same as 1	Same as 1
7. Hazardous Spent Antifreeze	Same as 1 or 2	Same as 1 or 2	Same as 1 or 2

TABLE II.A.6-4
FREQUENCY OF ANALYSIS

Hazardous Waste	Frequency ^a
1. Used Immersion Cleaner 699	Gas chromatograph annually TCLP annually
2. Used Parts Washer Solvent	Gas chromatograph annually Flash point annually TCLP annually
3. Parts Washer Solvent, Tank Bottom Sludge, and Free Water	Gas chromatograph annually TCLP annually
4. Parts Washer Solvent Dumpster Mud	Gas chromatograph annually TCLP annually
5. Dry Cleaning Wastes	Gas chromatograph annually TCLP annually
6. Paint Wastes	Gas chromatograph annually TCLP annually
7. Hazardous Spent Antifreeze	Gas chromatograph annually TCLP annually

- ^a In accordance with 40 CFR 264.13(a), Safety-Kleen will also perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste to be collected does not match the waste designated.

ATTACHMENT II.B.3 WASTE SEGREGATION

PROCEDURE FOR SEGREGATING WASTE TYPES

The used solvents are compatible with each other and with other materials to be handled at this facility, with respect to reactivity, and therefore do not require special segregation procedures. However, they are the primary source of feed stock for regenerating the clean solvents. For ease of inventory control and product integrity, separation and grouping of both used and fresh solvents is a standard practice at the facility.

All materials are managed in accordance with the local fire protection code and fire department requirements. Safety-Kleen uses a container color scheme as part of its waste management system. Eighty-five gallon overpack containers are used for the management of containers whose integrity has been compromised.

The immersion cleaner is always contained in partially filled, covered containers before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the facility and stored in the designated container storage areas before shipment to the recycle center. *Immersion Cleaner #609 is managed as a transfer waste.*

The dry cleaning wastes are contained in containers. All containers are DOT-approved. These containers are managed similarly to the used immersion cleaner containers and contents within the containers are not removed or processed at the facility. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

The parts washer solvents are collected in containers. These containers are then emptied into the dumpsters in the return/fill shelter. ~~Hazardous~~ spent antifreeze is packaged in containers, and the containers are not opened at the facility.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are palletized and stored in the container storage area of the warehouse.

ATTACHMENT II.C.1

ENGINEERING ASSESSMENT OF TANK SYSTEM

An engineering assessment of the tank system has been prepared and is included herein. This assessment includes an evaluation of the structural integrity and suitability of the tank system for handling hazardous waste as required under 40 CFR 264.191 and 264.192.

The facility has undergone minor modifications in the recent past which no longer conform to the drawings and figures in this report. These minor modifications have not affected the tank volumes, system integrity, or secondary capacity of the tank system. For a current figure of the facility layout and tank farm, refer to figures I.B.3-1 and II.C.2-1.

ATTACHMENT II.C.2 TANK SYSTEM SPECIFICATIONS

The facility includes the capacity for six aboveground steel tanks (Figure II.C.2-1). Used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) contained in containers returned from the customers are transferred via the wet dumpster into a 20,000-gallon tank, awaiting bulk shipment to the recycle center. The other two installed tanks consist of one 20,000-gallon parts washer solvent (Parts Washer 105 or Premium Solvent) product tank and one 20,000-gallon product tank. The remaining three tanks are intended for future installation. The two product tanks are not considered RCRA tanks.

MATERIAL COMPATIBILITY

Parts washer solvent and ethylene glycol are compatible with the mild steel tank structure; in fact, petroleum products are often used as a light hydrocarbon coating to prevent rusting of metal parts. Parts Washer 105 and Premium Solvent consist primarily of mineral spirits (petroleum naphtha). The Actrel® solvent consists primarily of a paraffinic compound with C₁₂ - C₁₄ chains. As with all petroleum storage vessels, water will accumulate over time due to condensation. The parts washer solvents have a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the product/water interface.

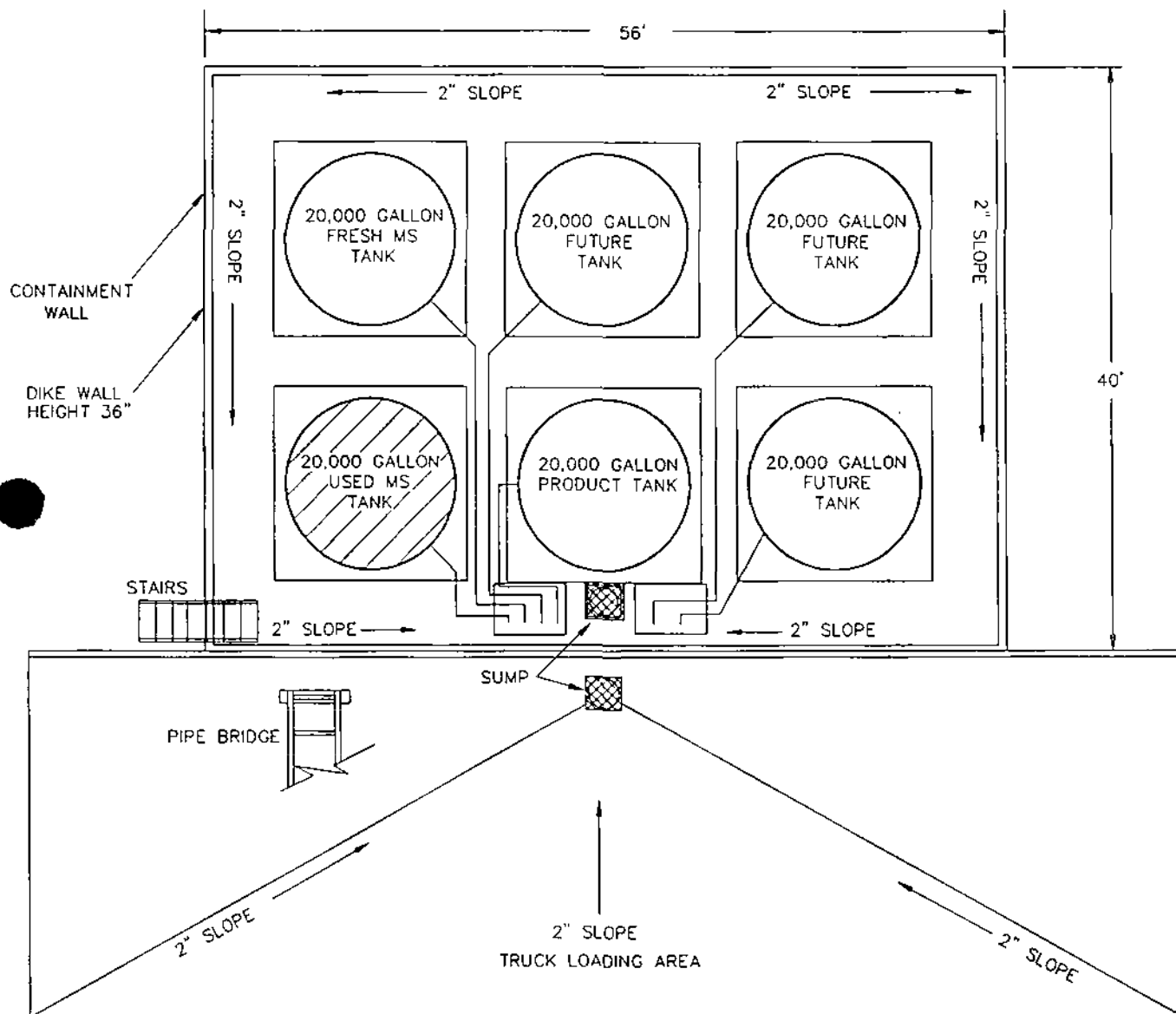
OPERATION PROCEDURES

Parts Washer Solvent

Spent parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) from parts washers is accumulated in the 20,000-gallon aboveground storage tank by transfer through the return and fill shelter. Containers of spent solvent are poured into the dumpsters (barrel washers) in the return and fill shelter, and material in the dumpster are pumped into the storage tank for spent solvent. The return and fill shelter has secondary containment.

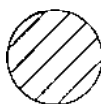
The barrel washers are located within the parts washer solvent return and fill shelters. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detailed information on the barrel washers.

Figure II.C.2-1
 Tank Farm
 Safety-Kleen Corp. Facility
 Medley, Florida



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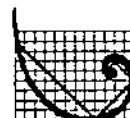


HAZARDOUS WASTE TANKS

NOTE: ENTIRE AREA IS CONCRETE

REVISED 03/06/95

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Used solvent is returned from customers via containers and poured into the barrel washers. The container is then placed on roller brushes contained within the barrel washer. As the machine is turned on, the container rotates on the brush and the outside of the container is cleaned. There is also a nozzle that sprays a stream of solvent into the bottom of the container to clean the inside of the barrel. The machine is turned off and the container removed. The procedure takes approximately five seconds per container. The container is then refilled using a pump and nozzle (Figure II.C.2-3(a)) similar to a gasoline pump. The waste is transferred to the tanks via piping and a pump (Figure II.C.2-3(b)).

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used parts washer solvent storage tank. There is a basket in the sump that collects sludge. At least once each working day, this basket is removed and sludge removed and placed into a sludge container. Each dumpster has four satellite accumulation containers. These containers are labeled as "Waste Sludge," "Glass/Metal," and "Rags/Absorbents." The Actrel® filters may be placed in the waste sludge container. The containers remain covered except when wastes are being added. Once full the containers are moved into the container storage area for later shipment to a Safety-Kleen recycle center for disposal or recycling. In addition to the sludge containers there is also one satellite accumulation container (approximately five gallons) connected to the drain pan which is in front of each barrel washer. These containers collect any spillage which fall into the drain pans. These containers are periodically emptied into the barrel washers in order to add the waste parts washer solvent to the bulk waste parts washer solvent tank.

Ethylene Glycol

Spent ethylene glycol is collected from customers in either containers or in tanker trucks. If the spent ethylene glycol ~~is hazardous~~, it arrives at the service center in containers, then it is placed into the container storage area. If the spent ethylene glycol ~~is nonhazardous~~, it arrives at the service center via tanker truck, then it ~~may be transferred from tanker truck to tanker truck~~.

TANK DESIGN

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are shown in

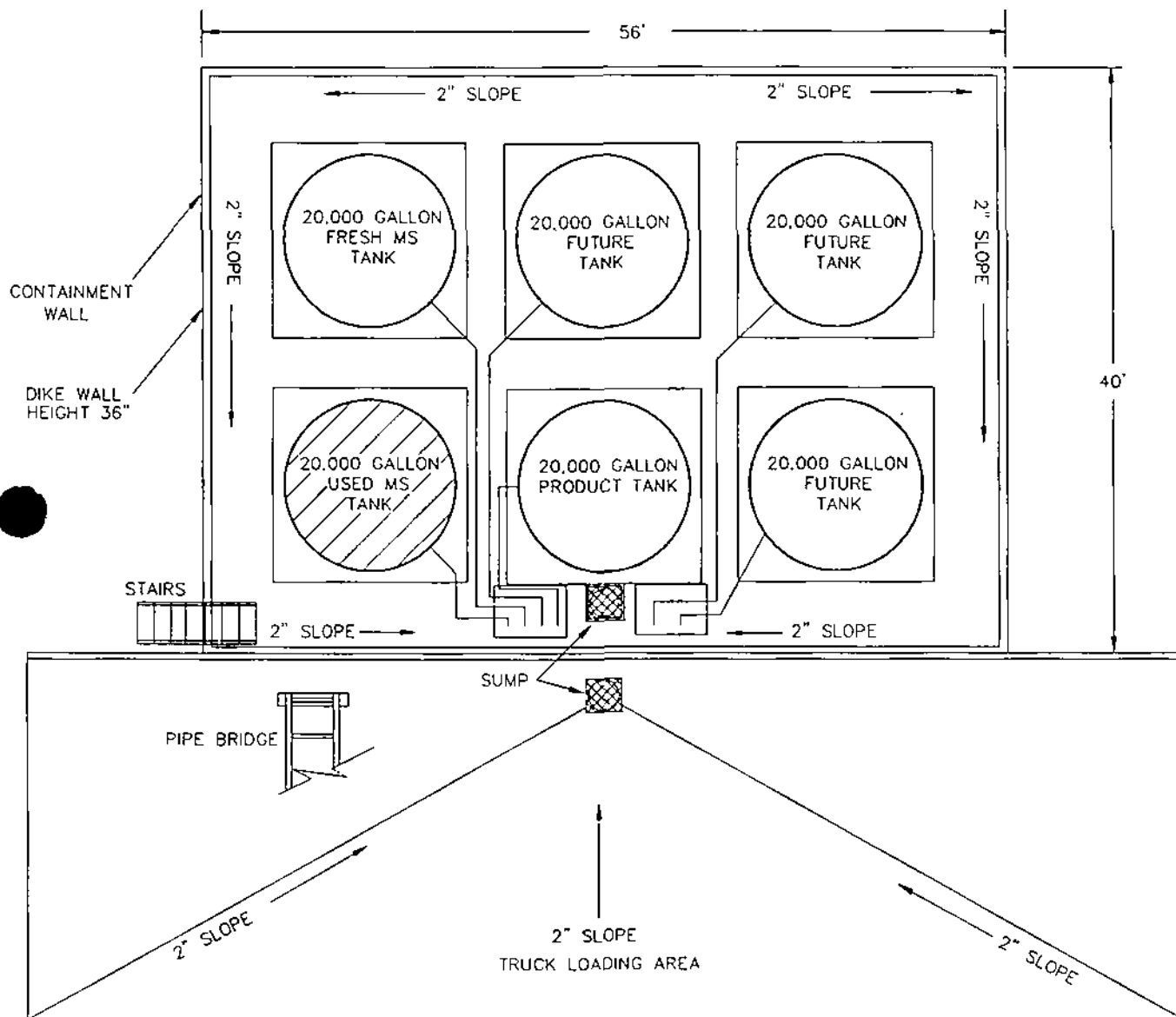
Figures II.C.2-4(a) and II.C.2-4(c). While this figure shows a parts washer solvent tank, the same design and installation specifications apply to the spent ethylene glycol tank. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high-level alarms. A sample design and installation of the tank alarm system is shown in Figures II.C.2-5(a) through II.C.2-5(f). The exact brand of tank alarm equipment used is equivalent to those shown in Figures II.C.2-5(a) through II.C.2-5(f). The tank seams are lapped with full fillet welds. The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer) in accordance with Underwriters Laboratories standards. All tanks are new and unused.

All tanks are aboveground, underlain by a 58' 0" x 40' 0" concrete slab, surrounded by a 36-inch to 38-inch high concrete dike and will be covered by a roof by the end of July 1992. The roof will extend over the tanker loading area. Therefore, no surface run-on is in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. If rainwater does accumulate in the containment area and it has been verified that no spill has occurred, then rainwater will be discharged to the ground surface. Only the branch manager or someone operating under his direct orders may discharge to the ground surface. A written record will be kept of all discharges to the ground surface. If it is not possible to verify that a spill has not occurred, then the rainwater will be pumped into drums and added to the used parts washer solvent tank via the wet dumpsters.

The tank farm dike and the return/fill shelter are sealed with a chemical resistant coating (Semstone 140). Level gauges (Figure II.C.2-6) are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tank's being 95 percent full. The exact brand of level gauges in use are at least equivalent to those shown in Figure II.C.2-6. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank are read before filling and before and during the filling of a tanker truck (the available volume of which is noted prior to emptying the tank) to prevent overfilling of the truck or tank. A tank truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill shelter is cleaned within 24 hours of a spill.

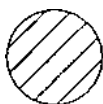
"No smoking" signs are posted at the tank farm and return/fill shelter.

Figure II.C.7-1
 Tank Farm
 Safety-Kleen Corp. Facility
 Medley, Florida



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HAZARDOUS WASTE TANKS

NOTE: ENTIRE AREA IS CONCRETE

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ATTACHMENT II.C.9

CONTROLS AND SPILL PREVENTION

The facility includes the capacity for six aboveground steel tanks. Used parts washer solvent housed in containers returned from the customers is transferred via the wet dumpster into a 20,000-gallon tank, awaiting bulk shipment to the recycle center. The other two installed tanks consist of one 20,000-gallon parts washer solvent product tank, and one 20,000-gallon ~~product~~ tank. The remaining three tanks are intended for future installation.

Parts washer solvent is compatible with the mild steel tank structure; in fact, petroleum products are often used as a light hydrocarbon coating to prevent rusting of metal parts. Parts Washer 105 and Premium Solvent are comprised primarily of mineral spirits (petroleum naphtha). The Actrel® solvent consists primarily of a paraffinic compound with $C_{12} - C_{14}$ chains. As with all petroleum storage vessels, water will accumulate over time due to condensation. The parts washer solvent has a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the product/water interface.

Spent parts washer solvent from parts washers is accumulated in the 20,000-gallon aboveground storage tank by transfer through the return and fill station. Containers of spent solvent are poured into the dumpsters (barrel washers) in the return and fill shelter, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill shelter has secondary containment.

The barrel washers are located within the return and fill shelter. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detailed information on the barrel washer. The barrel washer is a totally enclosed unit.

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are discussed in Attachment II.C.2. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high level-alarms.

Attachment II.C.1 provides an independent assessment of the tank system performed upon completion of construction. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 58' 0" x 40' 0" concrete slab, surrounded by a 36-inch to 38-inch high concrete dike and will be covered by a roof by the end of July 1992. Therefore, no surface run-on or precipitation is in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. If rainwater does accumulate in the containment area and it has been verified that no spill has occurred, then rainwater will be discharged to the ground surface. Only the branch manager or someone operating under his direct orders may discharge to the ground surface. A written record will be kept of all discharges to the ground surface. If it is not possible to verify that a spill has not occurred, then the rainwater will be pumped into drums and added to the used parts washer solvent tank via the wet dumpsters. The tank farm dike is sealed with a chemical resistant coating (Semstone 140). Semstone 140 or equivalent will be used for all future repairs or recoating of this area. Level gauges (Figure II.C.2-6) are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tank's being 95 percent full. The exact brand of level gauges in use is at least equivalent to those shown in Figure II.C.2-6. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank are read before filling and before and during the filling of a tanker truck (the available volume of which is noted prior to emptying the tank) to prevent overfilling of the truck or the tank. A tanker truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station is cleaned within 24 hours of a spill.

ATTACHMENT II.K.1

CLOSURE PLAN

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. Based on current business and projected facility conditions, this facility is expected to remain in operation until the year of 2025.

In the event that some presently unforeseen circumstance(s) results in the discontinuance of operations and permanent closure or sale of the facility, the following closure plan is designed to identify the steps necessary to completely close the facility at any point during its intended life, and should be used for tanks, container storage area, and equipment.

It is intended that all closures will be complete and final with removal of waste and decontamination of the facility and associated equipment, in order to eliminate the need for maintenance after closure and the possibility of escape of hazardous waste constituents into the environment.

Procedures described in this closure plan are also applicable to cleaning up of spills and repairing/decontamination of the facility or equipment.

An anticipated closure schedule is presented in Figure II.K.1-1. At the present time, a closure permit is required to close the facility. An anticipated maximum waste inventory for the container storage portion of the facility is presented in the following section.

FACILITY DATA

Aboveground Storage Tanks: The 20,000-gallon vertical carbon steel waste parts washer solvent tank is in a 36-inch high concrete containment area.

Container Storage Areas

The container storage area is an area with a sloped floor and collection trench. The maximum volume of product and waste stored is 29,400 gallons, with 6,912 gallons as containers of waste dry cleaner, spent immersion cleaner, parts washer solvent dumpster mud, FRS wastes, spent antifreeze, and/or paint waste.

Return/Fill Shelter: The return/fill shelter is an approximate 54' 5" x 80' 0" structure between the two halves of the building. It contains four dumpsters which facilitate the flow of solvent to the tank. These dumpsters are not intended for storage, but can hold a maximum of 2,016 gallons (504 gallons each).

MAXIMUM INVENTORY OF WASTE

The maximum amount of waste parts washer solvent in the tank is 20,000 gallons.

The maximum amount of containerized waste is 6,912 gallons of waste. This amount includes any combination of five-gallon containers, 15-gallon containers (also known as split 30- or 20-gallon), 16-gallon containers, 30-gallon containers, 55-gallon containers, and/or 85-gallon overpacks.

The maximum amount of solvent waste in the dumpsters is 2,016 gallons (four 504-gallon dumpsters).

CLOSURE PROCEDURE

PHASE I-OPEN THE TANK

- Access to aboveground tanks is obtained by draining the products, de-gassing, and removing man-ways.
- Prior to opening the tanks, the personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they will be provided with

MEDLEY, FLORIDA SERVICE CENTER CLOSURE COST ESTIMATE

1. TANK CLOSURE - Open, remove contents of, clean, remove, and dispose of ~~one~~ 20,000-gallon aboveground storage tank.

Phase II - Remove Contents and Clean

- a. Ship contents to a reclaimer (approximately ~~19,000~~ gallons @ 95% capacity)

Crew:

~~4~~ truck drivers @ \$17.56/hr. x 8 hrs. \$ ~~561.92~~

~~1~~ 20,000-gallon tanks x 95% = ~~19,000~~ gal.
~~19,000~~ ÷ 5,000 gal/truck = ~~4~~ trucks

~~4~~ trucks x 80 miles x 1.75/loaded mile \$ ~~560.00~~

Reclamation cost (\$0.30/gal. x ~~19,000~~ gal.) \$ ~~5,700.00~~

- b. Clean tanks

Crew:

1 foreman @ \$18.30/hr. x ~~12~~ hrs. \$ ~~219.60~~

2 laborers (\$17.00/hr. & \$3.00/hr.
hazard pay) x ~~12~~ hrs. \$ ~~480.00~~

- c. Pressure washer (1 day @ \$400/day) \$ ~~400.00~~

- d. Disposal and transportation of wash water
(~~2,000~~ gal. @ \$0.50/gal.) \$ ~~1,000.00~~

- e. Transportation of wastewater
(1,250 miles x \$1.75/loaded mile) \$ 2,187.50

- f. Analysis of ~~1~~ rinsate sample \$ ~~200.00~~

TOTAL PHASE I **\$~~11,309.02~~**

Phase III - Remove and Dispose of Tanks

a. Disconnect and remove appurtenant equipment

Crew:

1 foreman @ \$18.30/hr x 4 hrs.	\$ 73.20
4 laborers @ \$17.00/hr x 4 hrs.	\$ 272.00

b. Remove tank

Crew:

1 foreman	\$18.30/hr. x 4 hrs.	\$ 73.20
4 laborers	\$16.80/hr. x 4 hrs.	\$ 268.80
1 backhoe	\$250/day x 1 day	\$ 250.00
1 crane w/operator	\$500/day x 1 day	\$ 500.00

c. Decontaminate and remove secondary containment system

Crew:

1 foreman	\$18.30/hr. x 24 hrs.	\$ 439.20
3 laborers	\$16.80/hr. x 24 hrs.	\$ 1,209.60
1 backhoe	\$250/day x 2 days	\$ 500.00
1 jackhammer	\$150/day x 2 days	\$ 300.00
1 pressure washer	\$200/day x 1 day	\$ 200.00
Test rinsate	(2 @ \$200 each)	\$ 400.00
Remove and dispose of rinsate	\$0.50/gal. x 1,000 gal.	\$ 500.00
Remove and dispose of concrete	\$50/ton x 70 tons	\$ 3,500.00

TOTAL PHASE III **\$ 8,486.00**

Phase IV - Backfilling, Regrading, Soil Testing

a. Tests for soil contamination (1 per tank, 1 per pipe system)

2 samples x \$640.00/each	\$ 1,280.00
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b. Test backfill material (1 sample @ \$320)	\$ 320.00
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c. Regrading

Crew:

1 foreman	\$18.30/hr. x 4 hrs.	\$ 73.20
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1 laborer	\$16.80/hr. x 4 hrs.	\$ 67.20
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Front-end loader	\$350/day x 1 day	\$ 350.00
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Backfill (assume 10 CY required)	\$10/CY x 10 CY	\$ 100.00
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TOTAL PHASE IV	\$ 2,190.40
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Summary of Closure Costs for 2 20,000-Gallon Tanks

Phase II	\$11,309.02
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Phase III	\$ 8,486.00
-----------	-------------

Phase IV	\$ 2,190.40
----------	-------------

TOTAL	\$21,985.42
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5.	<u>PROFESSIONAL ENGINEER CERTIFICATION</u>	\$ 1,200.00
6.	<u>TOTAL CLOSURE COSTS</u>	
	One 20,000-Gallon Tank	\$21,985.42
	Container Storage Area	\$ 8,544.44
	Return/Fill Shelter	\$ 8,893.60
	Professional Engineer Certification	<u>\$ 1,200.00</u>
	TOTAL	\$40,623.46

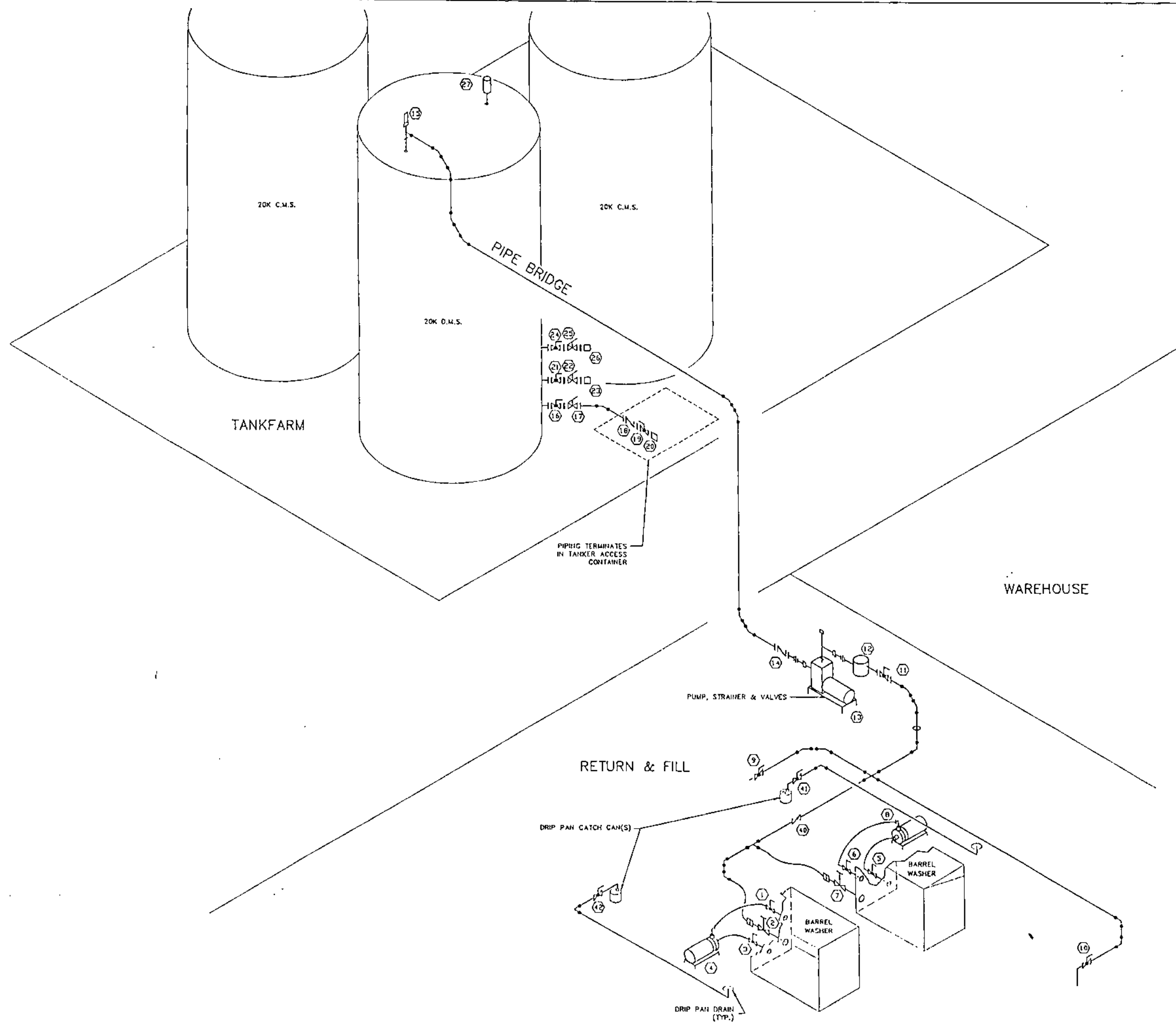
NOTE: These estimates are based on third-party costs.

ATTACHMENT II.S.1
EQUIPMENT

The following information is required under 40 Code of Federal Regulations (CFR) Section 270.25 for each piece of equipment which Subpart BB of Part 264 applies:

1. Equipment associated with the 20,000-gallon used parts washer solvent tank.
2. A site plan identifying the hazardous waste management unit at the facility is enclosed. Also enclosed are complete equipment inventory forms listing each piece of regulated equipment.
3. Types of equipment include pumps, flanges, and valves.
4. The hazardous waste stream is spent parts washer solvent, which can be considered to contain organics.
5. The hazardous waste state of parts washer solvent is liquid.
6. The equipment is considered to be heavy liquid service (mineral spirits vapor pressure is 2 mm Hg). Compliance with the standard (264.1058) will be achieved through daily facility inspections and, if required, leak detection monitoring and repair. A copy of the daily inspection record and leak detection and repair record for equipment is enclosed.

The requirements of 270.25(b), 270.25(c), and 270.25(e) do not apply to Safety-Kleen's Medley facility.



EQUIPMENT SCHEDULE

MARK	DESCRIPTION
(1)	1 1/4" BALL VALVE (BARREL WASHER)
(2)	2" GATE VALVE
(3)	1 1/2" BALL VALVE (BARREL WASHER)
(4)	RECIRCULATING PUMP (BARREL WASHER)
(5)	1 1/2" BALL VALVE (BARREL WASHER)
(6)	1 1/4" BALL VALVE (BARREL WASHER)
(7)	2" GATE VALVE
(8)	RECIRCULATING PUMP (BARREL WASHER)
(9)	2" FLANGED BALL VALVE
(10)	2" FLANGED BALL VALVE
(11)	2" FLANGED BALL VALVE
(12)	STRAINER ASSY.
(13)	USED SOLVENT PUMP
(14)	2" FLANGED CHECK VALVE
(15)	3/8" AUTOMATIC VACUUM BREAKER
(16)	3" FLANGED BALL VALVE
(17)	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
(18)	3" FLANGED CHECK VALVE
(19)	3" FLANGED BALL VALVE
(20)	3" FLANGED CAM LOCK
(21)	3" FLANGED BALL VALVE
(22)	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
(23)	3" FLANGED CAM LOCK
(24)	3" FLANGED BALL VALVE
(25)	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
(26)	3" FLANGED CAM LOCK
(27)	3" PRESSURE VACUUM BREAKER

GENERAL NOTES

- 1.) ACTUAL PIPING CONFIGURATION MAY VARY.
- 2.) NON-PERMITTED TANKS AND EQUIPMENT MAY CHANGE.

D	REMOVED E.G. TANK & EQUIP.	MBH	KJM	DP	022193
C	REMOVED ABOVE GRATING REF.	MBH	KJM	DP/VC	010492
B	ADDED TAGS 40, 41 & 42	MBH	KJM	-	010492
A	RELEASED FOR PART "B" PERMIT	MBH	-	-	071092
NO.	DESCRIPTION	BY	CHK	APPR	DATE

REVISIONS

TITLE					
ENVIRONMENTAL PIPING SCHEMATIC - EXISTING					
S Safety-Kleen Corp. 1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123 PHONE (708)607-0460					
SCALE	BY	CHKD	APPROVED	ENR	DATE
NONE	MBH	KJM	DP	MC	07-09-92
SERVICE CENTER LOCATION		SC-DWG NUMBER		REV. NO.	
MEDLEY, FL		309702-GDPB200		D	