

July 27, 2017

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

Fedex: 8064 6312 4267

RE: First Request for Additional Information (RAI)
Palm Beach County-Hazardous Waste
Safety-Kleen Systems, Inc.
FLD 984 167 791
Operating Permit No. 49625-010-HO

Dear Mr. Russell:

Safety-Kleen (SK) has prepared this letter to respond to the permit application first notice of deficiencies letter from the Department dated June 14, 2017. We have identified each of the Departments comments in bold, followed by our response. Revised pages of the application are also enclosed with this submittal.

General Comments:

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

SK Response: Revisions to the Part B are made throughout the Part B.

Specific Comments:

2. **Page 1:** Under the Description of Facility Operation, a brief description of waste oil is omitted and should be included in length and scope, like the other waste streams.

SK Response: Safety-Kleen has revised Part I, D. #2 Description of Facility Operation to include the above information.

3. **Page 3:** Antifreeze is not included on the list of FRS wastes.

SK Response: Antifreeze has been added to page 3, and is also discussed on page 4.

4. **Page 5, paragraph 1:** At least one figure must identify the battery storage area.

SK Response: Figure 8.1-1 has been revised to indicate the battery storage area.

5. Part I.D.3 Process Codes and Design Capacities:

- a. The application indicates that D003 is received as transfer waste. This waste code (and D002 if it is received as a transfer waste) must be added to this table and to the 8700-12FL.
- b. The discussion on the parts washer solvents managed does not distinguish between the spent premium solvent used in conventional parts washers vs. the solvent still bottoms recovered from Safety-Kleen distilling parts washers (System One type units). Please address how these still bottom wastes will be characterized and managed by the company. Does the management method differ if the customer is identified as a small or large quantity generator, as opposed to a conditionally exempt small quantity generator?

SK Response: D003 & D002 would be managed under the Fluid Recovery Service (FRS), which is part of the table (Part I.D.3). A new 8700-12FL will be sent to the Department including these codes.

The used oil/distillation sludge from System One type parts washing units would be managed according to the generators waste determination. If the generator is a CESQG, and they are a generator of used oil, SK recommends that they add this material to their used oil container/tank. If the generator is a SQG/LQG, and they have determined the material is a hazardous waste, it would be managed through the SK Fluid Recovery Service (FRS) and containerized waste service (CWS) as a 10-day transfer waste. If a SQG/LQG has determined the material is not a hazardous waste, they may manage the material with their used oil, or have it managed as a non-hazardous containerized waste through the SK CWS program.

6. Part II.A General, 2, Financial Assurance for Closure (Cost Estimates-Table 1):

- a. Part 2. Mobilize to Site and Prepare for Closure:
 - i. Under Assumptions, a gallon value is not provided for the waste mineral spirits tank. A full tank should hold 15,000-gallons; however, the tank should not be fuller than 95% of capacity (hence, 14,250-gallons may also be used). We note that the calculations used the correct figures so no action is needed.
 - ii. Under Subcontractor Costs:
 - 1) Under Transport waste mineral spirits to a TSD for treatment/disposal: Assumption should be 3 tanker trailers, not two, if each can carry a maximum load of 5,000-gallons; and 15,000-gallons instead of 12,000-gallons. However, we note that the calculations use the correct figures. No action needed.

- 2) Under Transport drums to TSD for Treatment/Disposal, a reference of "ECT 2004" is provided. Is this reference for the cost per drum? As that reference is 13 years ago, please update this figure to 2017 values. Revise as needed.
- b. Parts 3 and 5 – Please review the length of time decontamination will require for the storage tank and container storage area. Based on the rate per hour and the square footage provided, decontamination may tank longer than assumed. Please review and revise your cost estimates as needed.

SK Response: Updated closure cost estimates using the Cost Pro Default are included with this response letter.

7. Contingency Plan

- a. Page iii: Safety-Kleen's July 30, 2012 Safety-Kleen response to DEP's Notice of Deficiencies dated June 20, 2012 indicated that formal agreements would be the neighboring school (see snapshot below). Were agreements reached and if so, they should be included in the CP.

SK Response: Safety-Kleen contacted the Palm Beach County School District and were instructed to set up a notification procedure directly with the Boynton Beach Community High School (BBCHS). In addition, they indicated the 24 hour emergency phone number for the Palm Beach County School Police Department (PBCSPD) should be included on the notification page. Safety-Kleen (Jeff Curtis) met with Mr. Guarn Sims (Principal), and Ms. Karensa Wright (Asst. Principal), to discuss Safety-Kleen's operations. It was agreed Safety-Kleen would directly notify the BBCHS of an emergency by calling either of the two persons listed on the July 26, 2017 SK Emergency Notification Procedure letter, which was both hand delivered, and sent to the BBCHS via certified mail. A copy of this letter is enclosed with this response letter.

- b. **Page 8, Inspection of Security Equipment. Figure 5.2-1 only includes weekly inspection forms.**
 - i. Provide a checklist for daily inspection forms.
 - ii. Include the frequency for use of the "CO Safety Security Inspection" checklist.
 - iii. Ensure that the checklist includes that inbound and outbound containers have not exceeded the 72-hour period for unloading or shipping.
 - iv. Include inspection of above-ground piping.

SK Response: Safety and security equipment have been weekly inspection items since the facility began operation. Inspection of the container storage area, transfer storage area, tank farm & equipment (subpart BB tags), and return/fill station are performed on a daily operational basis. The "CO Safety Security Inspection" is the electronic version of the weekly Safety & Emergency Equipment inspection. Safety-Kleen will add the 72-hour period for inbound and outbound containers to the daily container storage area inspection. Above-ground piping is included on the daily storage tank inspection form.

c. **Page 17:**

- i. The CP should include discussions on the above-ground piping. Also, include a figure that shows the locations of the above-ground piping.

SK Response: A discussion of the above-ground piping has been added to the CP on page 5. Figure 9.1-1 shows the location of the piping from the Return/Fill Station to the waste solvent tank.

- d. **Page 22:** Under **Tank Area:** Figure 5.6-5 should be revised to show the location of the shallow drainage trench.

SK Response: Figure 5.6-5 has been revised to show the shallow drainage trench.

- e. **Page 24 Emergency Response Equipment and Communication:** Figure 5.6-1 does not show the location of first-aid kits or spill equipment noted in the text. The locations should be added to Figure 5.6-1.

SK Response: Figure 5.6-1 has been revised to show locations of first-aid kits and spill equipment.

- f. **Page 25:** The first paragraph indicates certain equipment will be tested when necessary. This is inconsistent with Table 5.2-1 that contains the inspection schedule for safety equipment.

SK Response: The word “tested” has been removed from the first paragraph to avoid confusion.

- g. **Page 28, Hurricane Watch:** We’d recommend insertion of language, similar to the Tampa application, stating that in accordance with Safety-Kleen’s internal guidance, a current list of employees and contact information is kept on hand at the facility.

SK Response: “A list of employees with telephone numbers is kept on hand” has been added under Hurricane Watch on page 28.

- h. **Figure 5.1-1 has “Used Antifreeze” written on top of the transfer area.** “Used Antifreeze” must be removed.

SK Response: “Used Antifreeze” has been removed.

i. **Table 5.6-1 Emergency response Equipment**

- i. Include the fire extinguisher located in the storage tank building.
- ii. The “Emergency Equipment Area” (Table 5.6-1) should be identified on Figure 5.6-1.
- iii. There are inconsistencies with Table 5.8-1 Description and Uses of Emergency Equipment. Some inconsistencies include:
 1. Table 5.8-1 can reference Figure 5.6-1 Locations of Emergency Equipment, for fire extinguishers, because the fire extinguishers are

located in areas, such as the office, other than points where solvent is transferred.

2. Absorbent materials are located in "Loading/Unloading Area/Warehouse" and "Emergency Equipment Area." It is unclear if these are the same or different locations.
3. Air purifying respirators are located in "Employee Lockers" and "Emergency Equipment Area."
4. Table 5.6-1 includes boots but Table 5.8-1 does not.

SK Response: Table 5.6-1 has been revised to include a fire extinguisher in the tank farm building, and the Emergency Equipment Area. Table 5.8-1 has been revised to reference Figure 5.6-1 for fire extinguishers, absorbent materials, air purifying respirators, and boots have been added to this table.

8. Waste Analysis Plan

- a. Page 3, first paragraph: The WAP does not contain procedures for assigning waste codes to the Branch-generated liquids and solids. Explain how waste codes are assigned for these wastes.
- b. The explanations provided in Safety-Kleen's August 26, 2016 First Request for Additional Information (items 7.a.v and vi) for the Safety-Kleen Tampa renewal should be included in the WAP as they clarify previous questions associated with management of waste streams generated by industrial sectors, and the distillation oil/sludge.
- c. Exhibit C-2 is, in part, illegible. Also, submit a more recent figure unless the "2003-2013" is the most recent.

SK Response: Branch generated liquids and solids (Debris) are not are not sampled and analyzed as part of the Annual Re-Characterization program. A "worst case scenario" is used for this waste stream. Page 3 has been revised to include information regarding System One Type Parts Washer machines, and page 9, paragraph 2 has been revised to include information regarding spent parts washer solvent from customers that have determined other waste codes may apply to their waste. A more legible copy of Exhibit C-2 is included with this response letter.

9. Part II. B Containers

- a. Pages 3 and 4: According to your application, oxidizers could be stored in the transfer area. Oxidizers are considered D003 wastes. D003 is not included on the 8700-12FL Form. The 8700-12FL form will need to be updated or D003 wastes will not be allowed on site.
- b. Page 3: A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device (264.177(c)). Your application must explain how staging of the oxidizers meets these requirements.

SK Response: A new 8700-12FL form is included with this response letter. Safety-Kleen understands, and takes very seriously, managing incompatible hazardous waste containers, such as oxidizers. Oxidizers would be managed as a 10-day transfer waste very infrequently at the site. All potential 10-day transfer wastes are first reviewed by the Central Profile Group (CPG). If a waste container requiring segregation is collected and transported to the branch (i.e., oxidizer); branch personnel would follow the following procedures while this container moves through the facility. The container would be placed separately on a self-contained spill containment pallet, and moved into the transfer storage area. Absorbent boom would be placed at the base of the spill containment pallet, and an area of at least 5 ft. cleared on all sides of this pallet to ensure no other incompatible material(s) (flammables/combustibles, organic chemicals, reducing agents) can be stored near, or come into contact with the material. Part II.B, page 3 has been revised to include these procedures.

10. Part II.C Tank System

- a. Page 3 and Figure 9.1-1: The tank system drawings in this section and in the contingency plan should include diagrams of all above ground piping. In addition, this section should more clearly show which joints are threaded vs. welded, and show that any piping joint outside of secondary containment is welded as stated in the second paragraph of page 3. The secondary containment system design for the ancillary equipment connected by threaded joints is not included in this section. Above-ground piping with welded joints that is inspected daily is exempt from the secondary containment requirements per 40 CFR 264.193(f)(2). Please compare the diagram in this section to Figure 11.1-1, showing threaded connectors at (23) through (26). Are these connectors located within secondary containment? If not, does this piping comply with 40 CFR 264.193(f)(4)?
- b. Page 8, Repair or Closure: Reports containing engineering certification of major repairs must be placed in the operating record and maintained until closure of the facility, per 40 CFR 264.196(f).

SK Response: Page 3 has been revised to indicate the piping from the wet dumpsters to the end of the return/fill station is connected by threaded connectors. Once the piping leaves the return/fill station it is welded until it reaches inside the tank farm, where it is again connected by threaded connections. Figure 9.1-1 has also been revised to indicate the above. Page 8 has been revised per the above comments.

11. Part II.K Closure Plan

- a. Page 1: In the third sentence, the plan mistakenly refers to the Tampa facility.
- b. Page 2: The last sentence (continuing on to page 3) should move "petroleum constituents" to a more appropriate part of the sentence [As written, "The rinsate samples will be analyzed by EPA Method 6010 for ~~petroleum constituents~~, the eight RCRA metals and nickel..."].
- c. Page 5, Concrete Containment System: Although final soil sampling locations will be determined by DEP and Safety-Kleen, we suggest adding, as item 3, the area outside the

secondary containment where rainwater is discharged (See discussion in the Contingency Plan, page 22).

- d. Page 6, Concrete Containment System: The plan states, "Prior to demolition of the perimeter walls, one representative composite sample of the construction materials will be collected and submitted for analyses of metals (by TCLP) and organics." This composite does not appear to be accounted for in the Cost Estimates. Please review and revise as appropriate.

SK Response: Page 1, 3rd sentence has been revised to refer to the Boynton Beach facility. Page 2, last sentence, petroleum constituent has been removed. Page 5 has been revised to include the stormwater retention area outside secondary containment where rainwater is discharged. Page 6, Concrete Containment System, regarding TCLP of construction materials: For this sample/analytical, the CCE have been revised to account for four samples and TCLP analysis.

12. Miscellaneous grammatical and typographic errors:

- a. Part II.K Closure Plan, page 2: Extra word ("container") in the second line from the bottom of the page.
- b. Table 11.2-2: Control Option for Return/Fill Area is denoted by "!!". The Department understands that you meant "11".
- c. Table 11.2-3: Extra letter ("n") in the header "Containers".

SK Response: The above errors have been revised and are enclosed.

The enclosed replacement pages are to be inserted into the initial permit application. If you have any questions regarding this submittal please contact me at (561) 523-4719.

Best regards,



Jeff Curtis
Safety-Kleen EHS Manager
5610 Alpha Drive
Boynton Beach, FL 33426

Enclosure(s): Revised permit application pages

cc: Jason Andreotta, FDEP/Southeast District

Part I

D. Operating Information

2. DESCRIPTION OF FACILITY OPERATION

Description of the Business

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

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

The Safety-Kleen parts washing equipment, together with the solvents are leased to customers; the leasing charge includes regularly scheduled solvent changes and machine maintenance. The business is conducted from local Branches (sales branches) located in 45 states. The Branches warehouse the products and equipment required to service the customers in their sales area. On a contractual basis, service representatives furnish clean solvent to the customers, pick up the used solvent, and ensure that the leased equipment is in good working order. In 1979, Safety-Kleen expanded their scope of operations to make their solvent leasing service available to owners of parts cleaning equipment, regardless of manufacturer, using Safety-Kleen's solvents.

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

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

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

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

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

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

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naptha, etc.
- Lubricating oils, hydraulic oils, synthetic oils, antifreeze, and machine oils.
- Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane.
- Photographic and x-ray related wastes.
- Paint and lacquer thinners.
- Other hazardous and non-hazardous halogenated and non-halogenated wastes.

10-Day Transfer Storage Area (FRS)

The 10-day transfer storage area is approximately 31' x 35'6" and is located in the main warehouse on the east side of the container storage area. Signage clearly marks this area as 10-day storage and it is separate from the permitted container storage area. All containers stored in the 10-day transfer area are manifested and in transit to other permitted facilities. Safety-Kleen Boynton Beach is not the designated facility for wastes stored in the 10-day transfer area.

10-Day Transfer Storage Area (Continued)

The Clean Harbors Technical Services group operates a 10-day transfer area in a trailer staged at the concrete loading dock on the south side of the warehouse building. All containers stored in this trailer are manifested and in transit to other permitted facilities. Safety-Kleen Boynton Beach is not the designated facility for wastes stored in the 10-day transfer trailer.

In 1990 Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. This service is offered in conjunction with Safety-Kleen's used oil collection service. All used antifreeze collected and managed by Safety-Kleen within Florida is recycled. The trucks used to collect and transport waste ethylene glycol are the same trucks used for collection and transport of used oil. At the customer locations, Safety-Kleen pumps used antifreeze and transports the material to the Branch for off-loading into a tank for storage. The ethylene glycol/used oil mixture is transferred to the Safety-Kleen re-refinery in East Chicago, Indiana, where the ethylene glycol is extracted from the oil by distillation. After separation, the ethylene glycol is shipped to a glycol refinery for additional purification into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's *Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012.

Safety-Kleen offers a service for the collection of bulk used oil, commonly referred to as Safety-Kleen Oil Services (SKOS). Straight tanker trucks are used to collect and transport bulk used oil. After collection, the used oil is transported back to the Branch and off-loaded into one of the used oil storage tanks for storage. The Branch is registered as a used oil transfer facility, and may store used oil for more than 24 hours and less than 35 days. At least weekly a tanker truck arrives at the Branch to pick up used oil for transport to the Safety-Kleen Pompano Beach/Ocala facility. From there it is ultimately shipped to the Safety-Kleen East Chicago, IN re-refinery for processing. Used oil is subject to specific acceptance criteria prior to collection, and divided into three (3) groups.

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

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

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

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

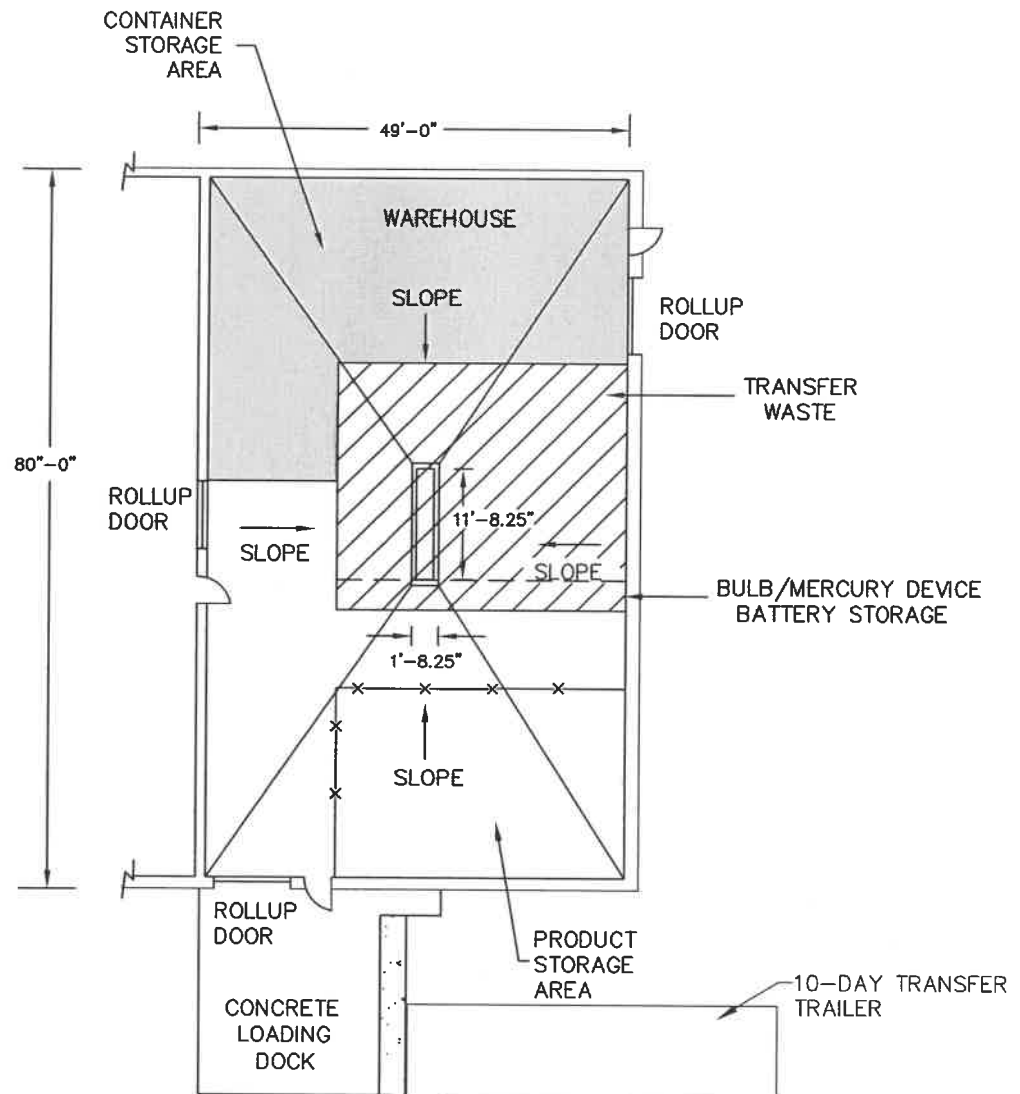
Containers of hazardous waste are picked up at customer locations and transported back to the Branch in route trucks. Each route truck is equipped with a hand-truck and electric lift gate for movement of containers. Upon arrival at the Branch, containers are placed on pallets and moved by way of forklift to the appropriate areas for storage within 24 hours.

Containers of used parts washer solvent are unloaded at the return/fill area and are dumped by hand into the wet dumpster for transfer via piping to the hazardous waste used solvent tank. Forklifts are used for loading containerized hazardous waste containers onto trucks for transport to permitted Safety-Kleen/Clean Harbors TSDF's.

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

FIGURE 8.1-1
CONTAINER STORAGE AREA
SAFETY-KLEEN SYSTEMS, INC. FACILITY
BOYNTON BEACH, FLORIDA

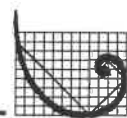
REVISION 0 - 05/23/17



0 20
FEET

LEGEND

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ERM.

Figure 8.4-1 (page #2)

Waste Volume: A N A N A N A N A N
 If "N", what is the reason: _____

72-Hour Period Shipping/Unloading Containers

 A N A N A N A N A N
 Ensure all inbound and outbound containers have been unloaded or shipped out of the facility within 72 hours

Condition of Containers: A N A N A N A N A N
 If "N" circle appropriate problem: missing or loose lids, incorrect or incomplete labels, rust, leaks, distortion, other: _____

Stacking/Placement/Aisle Space:

 A N A N A N A N A N
 If "N" circle appropriate problem: different from Part B floor plan, containers not on pallets, unstable, broken or damaged pallets, or other: _____

Containment: A N A N A N A N A N
Curbing, floor and sumps:

(Any material which accumulates in the secondary containment must be completely removed within 24 hours of being discovered) If "N" circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.) displacement, leaks inadequate sealant, or other: _____

Loading/Unloading Areas:

 A N A N A N A N A N
 If "N" circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

Observations, comments, date and specific nature of repairs of any items indicated as "Not Acceptable" (N): _____

A = Acceptable N = Not Acceptable

coating. The hazardous waste solvent tank has been fitted with a Moormann Analog Automatic Tank Gauge (information on the gauge is provided at the end of this section). Level gauges are used to measure liquid levels in tanks. Float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tanks being 95% full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. The gauges of the tank are read before filling the tank with additional material. Tank level readings are also taken prior to the filling of a tanker truck to prevent overfilling of the truck or 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 above-ground tanks. The tank should be operated at a maximum volume of 14,250 gallons (95% of capacity). The secondary containment under the tanks and return/fill station is cleaned within 24 hours of a spill, or in as timely a manner as possible, to prevent harm to human health and the environment.

2" single-walled steel piping from the wet dumpster in the return/fill area to the top of the hazardous waste solvent tank is connected by threaded connectors. This piping runs under the dock and leaves the Return/Fill station on the north side of the building. At that point, the piping system continues north towards the tank farm and is outside secondary containment (this part of the system has welded connectors). Once it reaches tank farm secondary containment the piping, with threaded connectors, runs vertical to the top of the tank. The piping system leaving the tank is constructed of 3" single-walled steel and is inside secondary containment. Figure 9.1-1 details the system.

Leak Detection System

The Safety-Kleen Boynton Beach branch has installed an automatic leak detection system at the above ground storage tank farm for the hazardous waste solvent tank. This system will enable detection of leaks, or releases, to the secondary containment 24-hours a day. The system consists of an Intellipoint sensor, which is placed at the base of the

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Boynton Beach, FL 2017

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
1. INVENTORY REMOVAL				
<u>Assumptions</u>				
- Waste mineral spirits tank(s) is full			Capacity (gallons)	
- Tank One			15000	
- Tank Two (IF APPLICABLE)			0	
	Total Tank Capacity		15000	
- Return/Fill station is full				
- Maximum capacity of drum washers added to waste mineral spirits tank quantity			550	
- Container storage area(s) full				
- CSA 1			6912	
- CSA 2 (IF APPLICABLE)			0	
	Total CSA Capacity		6912	
<u>Subcontractor Costs</u>				
- Transfer tank contents to tankers				
Tank Capacity (total gallons)			15550	
Work Rate to Unload Tank Capacity (hours per gallon)			0.0003	
Total Hours to Unload			4.7	
Labor and equipment rate to unload (PPE Level D) and cost	Labor/equipment	\$175.95	4.7	\$821
- Transport waste mineral spirits to a TSD for treatment/disposal				
Number of tanker trailers required (6,000 gallons max each load)			3	
Cost per mile = \$5.64/mile				
Mileage = 500 miles (Number in second column is 500 miles x number trucks)	Transport = 500 miles each	\$5.64	1500	\$8,460
Disposal/treatment cost (per gallon - low cost based on suitability for fuel)	TSD @ \$0.45/gallon	\$0.450	15550	\$6,998
- Transfer drums from CSA(s) to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	126	\$450
(Number in second column is number of drums determined from total CSA capacity)				
- Transport drums to TSD for Treatment/Disposal				
Total Number of Drums (Number is total of CSA drums and Flam Shed drums)			126	
Total Number of Trucks Required to Transport Drums (84 per truck max)			2	
Cost per mile = \$5.64/mile				
Mileage = 500 miles (Number in second column is 500 miles x number of trucks)	Transport trailer(s) x 500 miles	\$5.64	1000	\$5,640
Disposal/treatment cost (per drum - low cost based on suitability for fuel)	TSD @ \$90/drum	\$90	126	\$11,340
Activity 1. Subtotal				\$33,708
2. STORAGE TANK DECONTAMINATION				
<u>Assumptions:</u>				
- The tanks, piping and appurtenant equipment are decontaminated and remain in place				
- Rinsate sampling necessary because the tank will remain in place. Assumes 1 rinsate sample per tank.				
- Includes decontamination of the containment area				
- Assumes containment area to remain in place following decontamination				
- Assumes 1 rinsate sample required to leave containment in place				
- Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection.				
- Tank Interior Square Footage (based on tank volume)			Square Footage	
- Tank 1			905	
- Tank 2 (IF APPLICABLE)			0	
	Total Tank Interior Square Footage		905	
- Tank Farm Containment Square Footage (includes floor and walls)			3591	
<u>Prime Contractor Costs</u>				
- Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Sample(s) (1 per tank and 1 per containment)				
Work Rate for Sampling (hours per sample)			0.5000	
Number of Samples			1	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	0.50	\$46
- Drilling for Soil Samples (2.5 in boring to 1 ft each)				
Work Rate for Drilling (hours per foot)			0.3050	
Number of Feet (subslab sample depth = 1 foot each)			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29	0.61	\$89
- Collect 2 Soil Samples				
Work Rate for Sampling (hours per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.00	\$92
<u>Subcontractor Costs</u>				
- Decontaminate waste AST, piping and appurtenant equipment				
Work Rate to Pressure Wash (hours per square foot)			0.0405	
Area of Tanks to be decontaminated			905	
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	\$97.23	37	\$3,564
- Decontaminate Tank Containment Area				
Work Rate to Pressure Wash 1 sq ft (hours per square foot)			0.0405	
Total Area of Containment (includes walls and floor)			3591	
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	\$65.77	145	\$9,565
<u>Laboratory Subcontractor Costs</u>				
- Analyze rinsate sample(s) from tank(s) and containment area for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample SVOCs @ \$359/sample 8 RCRA Metals @ \$110/sample Total per sample cost	\$658	1	\$658
- Analyze soil sample(s) from containment area for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample SVOCs @ \$359/sample 8 RCRA Metals @ \$110/sample Total per sample cost	\$658	4	\$2,632
Activity 2. Subtotal				\$16,646

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Boynton Beach, FL 2017

Activity		Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
3. DECONTAMINATE THE RETURN/FILL STATION					
<u>Assumptions:</u>					
- Decontamination shall consist of washing with detergent/water solution and rinsing with high-pressure spray					
- Return/Fill structure and dock area will remain in place following decontamination					
- Drum washers to remain in place or sent offsite for reuse following decontamination					
- Rinsate sampling required from each drum washer to remain in place or sent offsite for reuse, and from containment					
- Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection					
- Square footage used for decontamination includes containment, dock and drum washer units					
				Square Footage	4055
<u>Prime Contractor Costs</u>					
- Costs for oversight and engineers inspection included in Closure Certification Activity below					
- Collect Rinsate Samples (1 per drum washer plus containment)					
Work Rate for Sampling (hours per sample)				0.5000	
Number of Samples				2	
Labor and equipment per work hour (PPE Level D)				1.00	\$92
- Drilling for Soil Samples (2.5 in boring to 1 ft each)					
Work Rate for Drilling (hours per foot)				0.3050	
Number of Feet (subslab sample depth = 1 foot each)				2	
Labor and equipment per work hour (PPE Level D)				0.61	\$89
- Collect Soil Samples					
Work Rate for Sampling (per sample)				0.5000	
Number of Samples				2	
Labor and equipment per work hour (PPE Level D)				1.00	\$92
<u>Subcontractor Costs</u>					
- Decontaminate waste AST, piping and appurtenant equipment					
Work Rate to Pressure Wash (hours per square foot)				0.0405	
Area of Return/Fill to be decontaminated				4055	
Labor and equipment for tank decon (PPE Level C)				164	\$15,968
<u>Laboratory Subcontractor Costs</u>					
- Analyze 1 rinsate sample per drum washer and containment for VOCs, SVOCs and RCRA metals					
VOCs @ \$189/sample					
SVOCs @ \$359/sample					
8 RCRA Metals @ \$110/sample					
Total per sample cost				\$658	2
					\$1,316
- Analyze soil sample(s) from containment area for VOCs, SVOCs and RCRA metals					
VOCs @ \$189/sample					
SVOCs @ \$359/sample					
8 RCRA Metals @ \$110/sample					
Total per sample cost				\$658	2
					\$1,316
Activity 3. Subtotal					\$18,873
4. DECONTAMINATE CONTAINER STORAGE AREA(S)					
<u>Assumptions:</u>					
- Decontamination shall consist of washing with a detergent water solution and rinsing with a high-pressure spray					
- CSA(s) to remain in-place following closure					
- Decontamination of CSA includes floor, curbing and containment trenches					
- Assumes 1 rinsate and 2 soil samples required per CSA. Actual number of soil samples will be based on engineer's inspection.					
- CSA Containment Square Footage					
- CSA 1					
- CSA 2 (IF APPLICABLE)					
				Total CSA Square Footage	3792
<u>Prime Contractor Costs</u>					
- Costs for oversight and engineers inspection included in Closure Certification Activity below					
- Collect Rinsate Samples (1 per CSA)					
Work Rate for Sampling (hours per sample)				0.5000	
Number of Samples				1	
Labor and equipment per work hour (PPE Level D)				0.50	\$46
- Drilling for Soil Samples (2.5 in boring to 1 ft each)					
Work Rate for Drilling (hours per foot)				0.3050	
Number of Feet (subslab sample depth = 1 foot each x number of samples)				2	
Labor and equipment per work hour (PPE Level D)				0.61	\$89
- Collect Soil Samples					
Work Rate for Sampling (hours per sample)				0.5000	
Number of Samples				2	
Labor and equipment per work hour (PPE Level D)				1.00	\$92
<u>Subcontractor Costs</u>					
- Decontaminate CSA(s)					
Work Rate to Pressure Wash (hours per square foot)				0.0405	
Total Area of Permitted CSA(s) to be decontaminated				3792	
Labor and equipment for CSA decon (PPE Level D)				154	\$10,101
<u>Laboratory Subcontractor Costs</u>					
- Analyze rinsate sample(s) from each CSA for VOCs, SVOCs and RCRA metals					
VOCs @ \$189/sample					
SVOCs @ \$359/sample					
8 RCRA Metals @ \$110/sample					
Total per sample cost				\$658	1
					\$658
- Analyze 2 soil sample(s) from each CSA for VOCs, SVOCs and RCRA metals					
VOCs @ \$189/sample					
SVOCs @ \$359/sample					
8 RCRA Metals @ \$110/sample					
Total per sample cost				\$658	2
					\$1,316
Activity 4. Subtotal					\$12,302

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Boynton Beach, FL 2017

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
5. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				
<u>Assumptions:</u>				
- Amount of decon wash water generated derived from previous closure experience. Quantity based on approximately 0.8 gal/sq ft for tank systems and 0.1 gal/sq ft for containment area floors				
Unit Description	Square Footage	Number Gallons	Number Drums	
STORAGE TANK DECONTAMINATION	905	724	14	
DECONTAMINATE TANK CONTAINMENT	3,508	351	7	
DECONTAMINATE THE RETURN/FILL STATION	4,055	3244	59	
DECONTAMINATE CONTAINER STORAGE AREA(S)	3,792	379	7	
PPE, CONSUMABLES, DEBRIS	NA	NA	5	
- Purchase 55-gallon drums to containerize wash water	Drums @ \$83 each	\$83	92	\$8,400
<u>Subcontractor Costs</u>				
- Transfer drums to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	92	\$328
- Transport drums to TSD for Treatment/Disposal				
Total Number of Trucks Required to Transport Drums (84 per truck max)			2	
Cost per mile = \$5.64/mile				
Mileage = 300 miles (Number in second column is 300 miles x number trucks)	Transport trailer(s) x 300 miles	\$5.64	600	\$3,384
Disposal/treatment cost (per drum - low cost based on lack of hazardous constituents)	TSD @ \$90/drum	\$90	87	\$7,830
Disposal/treatment cost for PPE drums (assumed haz to landfill)	TSD @ \$250/drum	\$250	5	\$1,250
Activity 5. Subtotal				\$21,192
6. CLOSURE CERTIFICATION				
<u>Assumptions:</u>				
- Cost Pro unit rate per unit to be closed is \$4,118				
- Unit rate includes engineer inspection and decontamination oversight of each unit				
<u>Prime Contractor Costs</u>				
- Oversee and certify closure per unit times number of units	Project Manager/Engineer	\$4,118	3	\$12,354
Activity 6. Subtotal				\$12,354
COST ESTIMATE ACTIVITIES SUMMARY				
1. INVENTORY REMOVAL				\$33,708
2. STORAGE TANK DECONTAMINATION				\$16,646
3. DECONTAMINATE THE RETURN/FILL STATION				\$18,873
4. DECONTAMINATE CONTAINER STORAGE AREA(S)				\$12,302
5. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				\$21,192
6. CLOSURE CERTIFICATION				\$12,354
TOTAL CLOSURE COST ESTIMATE				\$115,075
CONTINGENCY				15%
TOTAL CLOSURE COST WITH CONTINGENCY				\$132,336

Notes:

- Estimate assumes that waste management units are at permitted capacity at time of closure, which is the most expensive in the facility's operating life.
- All unit rates obtained from Cost Pro version 6.0, which is designed to be representative of 3rd party costs and includes the following:
 - Transportation @ \$5.64/mile and 300 mile trip
 - Disposal for bulk liquids \$0.45/gallon based on suitability of waste mineral spirits as fuel
 - Disposal for CSA liquids \$90/drum based on suitability of drummed waste streams as fuel
 - Disposal of decon wash water \$90/drum based on lack of hazardous constituents in waste (soapy water)
 - Subcontractor Decontamination Rate for tanks and return/fill based on PPE Level C
 - Subcontractor decontamination rates for tank containment, CSAs and Flam Shed (if applicable) based on PPE Level D
 - Prime Contractor Rates based on hourly rate for rinsate sampling, drilling and soil sample collection
 - Lab subcontractor rates for analysis of rinsate and soil samples (Assumes VOCs, SVOCs and metals)
 - Closure Certification Activity includes contractor oversight, PE Integrity inspections and reporting/Certification

Instructions: Enter unit capacity and dimensions for each permitted unit. See notes below for color code key.
Only cells highlighted in red should be changed to match site conditions.

Numbers in red are site specific and should be changed to match actual permitted units. Enter appropriate capacity.
Numbers in bold red are linked and will autopopulate on the closure cost estimate worksheet
Closure cost estimate worksheet includes 2 tanks and 2 CSAs. Enter 0 for second unit capacity if a second unit is not permitted.
Numbers in blue below represent cells with formulas and are calculated values - DO NOT CHANGE
Numbers in bold blue below are linked and will autopopulate on the closure cost estimate worksheet
Numbers in black below are generally not included in SK permits or closure plans and are estimated based on typical dimensions.
Numbers in bold black are typical dimensions that are linked and will autopopulate on the closure cost estimate worksheet

Permitted Tanks (ASSUMES 18 FOOT TALL TANK AS DEFAULT; RADIUS AND SQUARE FOOTAGE)

Tank 1	Capacity					15000
	Radius	6				
				Tank 1 Interior Square Footage		904.7787
Tank 2	Capacity					0
	Radius	0				
				Tank 2 Interior Square Footage		0
Tank Farm Containment						
	Floor Dimension	71	33			2343
	Wall Dimensions (long)	71		6	2	852
	Wall Dimension (short)	33		6	2	396
				Total TF Square Footage		3591

Return/Fill

Capacity of Drum Washer 1 (typical, capacity estimated)	275
Capacity of Drum Washer 2 (typical, capacity estimated)	275
Total Drum Washer Capacity	550
Square Footage (typical estimated)	1000

CSA 1 Containment

Permitted Capacity			6912
Floor Dimension	79	48	3792

CSA 2 Containment

Permitted Capacity			0
Floor Dimension	0	0	0



July 26, 2017

Certified Mail: 7008 3230 0001 2516 5432

Mr. Guarn Sims, Principal
Boynton Beach Community High School
4975 Park Ridge Blvd.
Boynton Beach, FL 33426

RE: Emergency Notification Procedure from Safety-Kleen Systems, Inc., 5610 Alpha Drive, Boynton Beach, FL 33426.

Dear Mr. Sims,

The purpose of this letter is to set up a notification procedure whereby Safety-Kleen will notify the Boynton Beach Community High School in the event of an emergency situation (fire, explosion, chemical release, etc.) at our facility that requires evacuation. Safety-Kleen operates a hazardous waste storage facility at the above address, which is directly across the street from the high school. In the event of an emergency at our site requiring evacuation, the following person(s) at the Boynton Beach Community High School will be notified, in addition to the Palm Beach County School Police Department:

Ann McKessy: (561) 752-1221
Dominic Rizzatti: (561) 752-1204
Palm Beach County School Police Department (24 hours): (561) 434-8700

In addition, Safety-Kleen is providing its' emergency contact list, which includes the phone numbers of local authorities and our emergency coordinators. Thank you for your time in this matter.

Sincerely,

Jeff Curtis
EHS Manager
Safety-Kleen Systems, Inc.
(561) 523-4719
jeff.curtis@safety-kleen.com

Enclosure: Safety-Kleen Boynton Beach Emergency Contact List

5610 Alpha Drive Boynton Beach, FL 33426 (561) 600-3077
Safety-Kleen Systems, Inc. | A Clean Harbors Company | www.safety-kleen.com



Revision Date: 10/27/16

**Safety-Kleen
Boynton Beach Branch
Emergency Coordinators Phone Numbers**

Primary:	William Cruz	Alternate:	Donald Zhaner
	5238 Rivermill Lane		14805 Tangelo Blvd.
	Lake Worth, FL 33463		West Palm Beach, FL 33412
	Office (561) 736-1339		Office (561) 736-1339
	Cell (954) 459-1918		Cell (561) 891-9201

Emergency Notification Numbers

Safety-Kleen's 24 Hour Emergency Response Reporting System
1-800-468-1760

Florida DEP- Southeast District

(561) 681-6600 (Monday – Friday, 8:00 a.m. to 5:00 p.m. except Holidays)
After Hours, please call (850) 413-9911 or 1-800-320-0519

If you are unable to contact the DEP at the above, please call:
National Response Center 1-800-424-8802

Emergency Teams to be Notified:

Boynton Beach Fire Station #5
Emergency Operations Center
2080 High Ridge Road
Boynton Beach, FL 33426
(561) 742-6333 or 911

Boynton Beach Police Department
135 NE 1st Ave
Boynton Beach, FL 33435
(561) 375-6100 or 911

Bethesda Memorial Hospital
2815 S. Seacrest Blvd.
Boynton Beach, FL 33435
(561) 737-7733

***SAFETY-KLEEN SYSTEMS, INC.
BOYNTON BEACH FACILITY***

***PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND
EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS***

TABLE OF CONTENTS

GENERAL INFORMATION	4
DESCRIPTION OF ACTIVITIES	4-7
INSPECTION PROCEDURES	7-10
EMERGENCY NOTIFICATION	10
ACTIONS OF THE EMERGENCY COORDINATOR	11-15
POTENTIAL SPILL SOURCES (ACTIONS/PROCEDURES)	15-22
DECONTAMINATION	23-24
EMERGENCY RESPONSE EQUIPMENT/COMMUNICATION	24-25
FIRE CONTROL PROCEDURES	25-27
EXTERNAL EMERGENCY FACTORS	27-29
EVACUATION PLAN	29-30
AVAILABILITY/REVISION OF THE PLAN	30
ARRANGEMENT WITH LOCAL AUTHORITIES	31

***PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND EMERGENCY
PROCEDURES FOR DAILY BUSINESS OPERATIONS***

GENERAL INFORMATION

Purpose

The preparedness, prevention, and contingency plan and emergency procedures are designed to comply with 40 CFR Part 264.30-37. In addition, the procedures in the plan 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 to the procedures contained in this plan.

General Description of Activities

The business activities conducted at the Boynton Beach Branch 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 Branch, where separate storage tanks are utilized for the storage of clean and used parts washer solvent. One 20,000-gallon fresh parts washer solvent storage tank currently is utilized at the facility. In addition, a 15,000-gallon tank is used to contain hazardous waste solvent, and one 15,000-gallon tank and one 20,000 gallon tank are used for storage of Used Oil. One 5,000 gallon tank is for oily water. Warehouse space is designated for the storage of containers of both clean and used immersion cleaner, parts washer solvent, paint waste, Fluid Recovery Services (FRS) wastes, and dry cleaning wastes. Over-pack containers are used for the management of containers whose integrity has been compromised.

Parts washer solvents are transported in covered containers between the Branch and customers. Upon returning to the Branch, the used parts washer solvent is transferred from the containers into a wet dumpster (solvent return receptacle) in which coarse solids in the parts washer solvents are retained. Used parts washer solvent from the wet dumpster flows via 2-inch piping into a 15,000-gallon aboveground tank for storage. This piping runs east under the return/fill dock, turns north, and runs overhead to the tank farm building. The piping is connected by threaded connectors from the wet dumpsters to the end of the return/fill station, and is inside secondary containment. Once it leaves the building it is connected by welded connectors until it reaches the tank farm building, where it is again connected by threaded connectors inside secondary containment. Hazardous waste parts washer solvent is picked up regularly by a bulk tanker truck from a Safety-Kleen TSDF, which at the same time delivers clean parts washer solvent. The sludge in the wet dumpster is regularly cleaned out, containerized, and stored as Branch generated waste in the container storage area for later shipment to a permitted Safety-Kleen or Clean Harbors TSDF for reclamation or disposal.

The immersion cleaner remains in a covered container 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 Branch. Immersion cleaner waste containers are located in the permitted container storage or 10-day transfer area. Immersion cleaner wastes are normally received on manifests which terminate at another Safety-Kleen/Clean Harbors facility.

Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers. Dry cleaning wastes handled by Safety-Kleen consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms, all of which fall into the categories of either perchloroethylene-based waste or naphtha-based waste. The dry cleaning wastes are packaged on the customer's premises in containers. Dry cleaning wastes are located in the permitted container storage or 10-day transfer area. Dry cleaning wastes are normally received on manifests which terminate at another Safety-Kleen/Clean Harbors facility.

All antifreeze collected and managed by Safety-Kleen within Florida is recycled. At the customer's location, Safety-Kleen pumps used ethylene glycol (antifreeze) into a Safety-Kleen

used oil tanker truck. The used antifreeze is transported from the customer site to the branch, for storage until shipment to SK East Chicago, IN re-refinery. There, the used antifreeze is separated using distillation and sent to a recycling facility for reprocessing into a pure product, which is then sold on the open market. This procedure is in accordance with FDEP's Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities, dated May 22, 2012. In addition, Safety-Kleen sells its' own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is shipped to SK distribution centers, and then shipped to 3rd party recyclers.

Safety-Kleen offers a used oil collection service commonly referred to as Safety-Kleen Oil Services (SKOS). Used oil is collected by straight tanker trucks and transported to the Boynton Beach branch for storage in the 15,000/20,000 gallon above ground storage tanks. The used oil is then transported to the SK Pompano Beach/Ocala facility where it is shipped via railcar to the Safety-Kleen East Chicago, IN re-refinery for processing. The branch is registered in Florida as a used oil transporter, and transfer facility.

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

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

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

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

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

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

INSPECTION PROCEDURES

Inspection of Safety Equipment

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

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

- A weekly inspection of fire extinguishers must be performed to ensure that the tag date has not expired and the units are properly charged and accessible.
- A weekly inspection of eyewash stands must be performed to assure accessibility, and proper operation of this equipment. Inventory of the first-aid kit must be checked on a weekly basis.
- A weekly check of the supply of spill control equipment (absorbent material) must be performed.
- A weekly check of the conditions and inventory of other emergency equipment will be made. This includes gloves, aprons, goggles, respirators, and other personal protective equipment.
- A weekly check of the condition and inventory of communication devices will be made. This includes telephones, intercom, and emergency alarms.

Inspection of Security Equipment

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

Inspection of Waste Management Facilities

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

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

- Observe tank exterior for loose anchoring, wet spots, and leaks.

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

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

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

Daily inspections of the container storage area include the following:

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

- Examine containment areas to detect signs of deterioration and failure of the containment system such as cracks, breakage, settlement, and spillage.

Corrective Action

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

EMERGENCY NOTIFICATION

Emergency Coordinator

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

EMERGENCY RESPONSE AGENCIES AND TEAM MEMBERS

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

ACTIONS OF THE EMERGENCY COORDINATOR

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

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

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

Procedure for Assessing Possible Hazard to the Environment and Human Health

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

- If a fire or explosion is determined uncontrollable by plant personnel or threatening neighboring establishments or population, assistance from a local emergency response agency shall be summoned immediately and an evacuation order requested.
- In case of a release outside of the containment area that is deemed immediately uncontrollable or unrecoverable, Safety-Kleen's 24 hr. emergency response system (800) 468-1760) and/or local emergency response agency shall be called in.
- After termination of a fire or explosion or containment and preliminary cleanup of a spill, evaluate whether residues in the form of gas or liquid have become airborne, seeped into ground water, and/or flowed into surface water bodies.
- Expert assistance should be requested to determine whether the escaped materials are potentially harmful and whether the receiving medium ultimately will be a populated area, public water supply source, a private well, or an environmentally sensitive area.
- Additional steps shall then be taken to mitigate the potential impact on the environment and human health, in accordance with expert recommendations.

If the emergency coordinator determines that the facility has had a release, fire, or explosion or other emergency that could threaten human health, or the environment outside the facility, the coordinator must report those findings, as follows:

- If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities. The coordinator must be available to help appropriate officials decide whether local areas should be evacuated.
- The coordinator must immediately notify the State Warning Point at (850) 413-9911 (24 hours-7 days a week availability).
- The coordinator must immediately notify the Southeast District of the FDEP, (561) 681-6600 during regular business hours, and if a release equals or exceeds the Reportable Quantity (RQ) the National Response Center (800) 424-8802 must immediately (within 15 minutes) be contacted.

The report must include:

- (1) Name and telephone number of notifier;
- (2) Name and address of facility;
- (3) Time and type of incident (e.g., release, fire);
- (4) Name and quantity of material(s) involved, to the extent known;
- (5) The extent of injuries, if any; and
- (6) The possible hazards to human health, or the environment outside the facility.

Immediate assistance in assessing and responding to an emergency is obtained by the emergency coordinator by calling the 24-hour Safety-Kleen emergency number ((800) 468-1760). The 24 hour emergency number is used by Safety-Kleen to respond to all reports of spills or chemical emergencies. All Safety-Kleen facilities in the state use this 24-hour emergency number. This allows Safety-Kleen to respond to any emergency with a maximum of effort, thereby reducing the threat to human health or the environment.

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated or stored until cleanup procedures are completed; and
- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

The owner or operator must notify the appropriate state and local authorities that the facility is in compliance with the requirements of the preceding paragraph, before operations are resumed in the affected area(s) of the facility.

The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the owner

must submit a written report on the incident to the Southeast District of the FDEP, at 3301 Gun Club Road, MSC 7210-1, West Palm Beach, FL 33406. The report must include:

1. Name, address, and telephone number of the owner or operator;
2. Name, address, and telephone number of the facility;
3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

POTENTIAL SPILL SOURCES

The following is a list of activities that have the potential for a small scale (less than 55 gallons of waste) pollution incident.

1. Moving of containers.
Every time a container is moved, the possibility exists that it could tip over or be dropped. To minimize the possibility of spillage of solvent under those conditions, all container lids must be confirmed to be secure before movement.

2. Delivery truck container transfers.
 - a. Individual delivery containers hold from 5 to 55 gallons of waste, a quantity which can be contained by oil sorbent clay or pads, if accidentally spilled.
 - b. Each vehicle is equipped with a hoist and hand cart for ease of moving clean solvent containers off the truck and into the customer's shop and returning the dirty solvent containers to the truck.
 - c. Lids are secured on containers prior to movement to prevent a spill.
 - d. Each truck contains a complete spill kit, shovel, and a quantity of sorbent material to contain minor spills.
 - e. The cargo must be secured in the route vehicle before transit.

Spills Inside Buildings

In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. Following the instructions of the Safety Data Sheet (SDS), a worker would enter the area wearing rubber gloves, boots, and mop up the liquid and return it to dirty storage. Spills inside the building will be contained by the existing secondary containment structures, or by using available absorbent material and booms. Proper characterization, treatment, and disposal of the decontamination water will be done on a case by case basis depending on the material released. All material will be disposed of per federal, state, and local regulations. The cleanup is completed only when the workers have cleaned themselves and the emergency equipment with soap and water.

Spills on Concrete Pads

Concrete pads in loading and unloading areas are, in most cases, equipped with secondary containment. Under most spill conditions, product can be totally contained on the concrete surface and in the containment system. Upon containment, arrangements must be immediately undertaken to recover the material. Any soil that may be involved must be removed and handled in the same manner as the material spilled.

Tank Spills or Leakage

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

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

Spill Control Procedures

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

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

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

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

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

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

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

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

Information on every spill will be recorded through an internal database. A notification of each spill will be sent to the Corporate Environment Health and Safety Department.

Reports of emergency incidents will be transmitted to the Secretary of the FDEP or designee within 15 days of occurrence. This report shall include:

1. Name, address, and telephone number of the owner of operator;
2. Name, address, and telephone number of the facility;
3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of materials involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

The facility will complete all permit condition spill reporting as required, and follow the requirements of Chapter 62-150, F.A.C. Hazardous Substance Release Notification.

Containment Systems

Containerized Wastes

Hazardous waste container storage takes place inside the warehouse building and is depicted on Figure 5.6-3. The containment system is sealed with an impermeable coating and is free of cracks. Containers are stored on pallets whenever possible, and double stacked.

The floor slopes slightly towards the containment trench in the center of the warehouse (Figure 5.6-3). Any small spill that might occur would migrate to the trench. The spilled material would be cleaned up where it affects the floor, and in the containment trench. In the event that a large spill were to occur, some dispersion would be expected to occur based on the direction, force, and pathway obstacles presented by and to the spill. The material would ultimately flow to the containment trench (due to the slope of the floor), and pool on the sealed floor if the trench were to be completely filled.

In the container storage area, containers are handled with a fork-lift and/or a hand-truck free of sharp points and stacked by hand. Every time a container is moved, the possibility exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, container lids are secured and containers are kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into a safe container. Each route truck is equipped with a lift gate or an electric hoist. The appropriate device is used in the loading/unloading operation to minimize chances for spillage and/or employee injury. Containerized wastes at the Boynton Beach facility are loaded/unloaded in the vicinity of the contained concrete dock on the southeast side of the building (Figure 5.1 2) and return/fill dock. The return/fill dock is completely enclosed within secondary containment.

FRS Wastes/10-Day Transfer Wastes

Transfer wastes will be located in the areas depicted in Figure 5.6-3. The containment system in the warehouse is coated, free of cracks, and is sufficiently impervious to prevent seepage into or through the concrete. FRS hazardous wastes are 10-day transfer only.

All containers are sealed during movement and are located within diked, concrete floored areas to contain any potential spill. Most releases would entail small quantities of material and can be cleaned up immediately through the use of hand-held electric pumps, mops, wet/dry vacuums, or sorbent materials, should a spill occur. Any spilled waste is contained for offsite recycling/reclamation. All containerized waste movement is performed manually, by a pallet jack, or propane fueled forklift truck.

Return/Fill Station

The return/fill station (Figure 5.6-4) is a covered, grated dock with concrete pads and curbing. It is part of the enclosed building and sits between the office area and the main warehouse. Sloping of the containment area is visually non-detectable. However, there is a slight slope toward the sumps (blind) built into the concrete floor surface in the center of the area. The center of the return/fill station has an elevated grate, which is positioned approximately 2.5 ft. above the concrete floor. Two wet dumpsters are positioned on the grated area. Drive over curbing is present on the floor at the north and south sides so that delivery trucks can be positioned within containment during loading/unloading. Any spill that may occur on the concrete floor is directed by gravity into the sump. Any residual material remaining can be cleaned up with mops, wet/dry vacuums, or sorbent material, should a spill occur. Spilled waste will be contained in this area, and when cleaned up, properly characterized to be sent for recycling/reclamation. Spills in this area will be cleaned up and the area decontaminated. The decontamination process should result in *de minimus* amounts of residue remaining. The areas outside the return/fill station are asphalt covered, thus preventing direct contact with soils and ground water.

Tank Area

The tank area (Figure 5.6-5) houses five above-ground storage tanks within an enclosed building, and is provided with containment. The foundation slab is essentially flat, but has a shallow drainage trench next to the perimeter walls. The trench leads to two sumps, one in the northeast corner and one in the southwest corner of the tank farm. Tank loading/unloading connections are located within the containment system on the south side of the tank farm. A drip pan is present under these connections. Any tank leaks or unloading spills will be controlled by the containment system, or the drip pan. This material may be readily removed by pumping from the containment system, sump, or drip pan by wet vacuum or sorbent material. The tank farm is an enclosed building to prevent rainwater from entering the containment area. Should rain water enter the containment area it will be verified visually that no iridescent sheen exists before discharging to the ground outside. Only the General Manager or someone operating under his/her direct orders may discharge to the ground surface. If it is not possible to verify that a spill has not occurred or the water exhibits an iridescent sheen, then the rainwater will be pumped into the used parts washer solvent tank via the wet dumpster at the return/fill station. Tankers used for offloading/loading park on the concrete paving on the south side of the tank farm (Tanker Truck Spill Containment Area-Figure 5.6-5). Any leaks at the tanker connections will be removed by absorbent material or wet vacuum.

Employee training emphasizes the importance of inspection, maintenance, personal safety, and reporting of conditions with pollution incident potential. This training, coupled with the Safety-Kleen's containment system and immediate cleanup of any spills, eliminates or greatly minimizes the chance of contamination of ground water and/or surface water in the vicinity of the site. In addition, surface run-off at the site does not come in contact with stored products in the waste management area.

DECONTAMINATION

Once the spilled material has been cleaned up, the spill area and equipment used during the spill clean-up must be decontaminated and/or disposed, as described below.

Concrete Surfaces/Containment Area

- Concrete surfaces/containment areas will be cleaned with a detergent solution and then rinsed with hot water. The rinsate will be collected via wet vacuums and placed in containers. Visual inspection will be used to determine the success of the decontamination procedure.
- The intent of the surface decontamination is to prevent current or future releases of materials to the environment. Vigorous cleaning with detergent is sufficient to prevent releases to the environment during normal operations. Potential for hazards from residual materials to future occupants of the facility are addressed in the closure plans for the facility and the decontamination procedures incorporated therein.

Equipment

The equipment used to clean the area includes mops, pails, scrub brushes, and a wet/dry vacuum. Equipment which is considered reusable (i.e., pails, wet/dry vacuum, hoses) will be washed with detergent, and wash water and rinsate will be collected for proper disposal. All non-reusable equipment and/or equipment which is not capable of being decontaminated will be containerized and disposed of as hazardous waste. Equipment used in a response will be deemed fit for use after being used in any response.

Wash Water and Rinsate

If the rinsate or other wastes generated in the clean-up process is determined to be hazardous, it will be properly disposed of as a hazardous waste; otherwise, the material will be disposed of as an industrial waste. It should be noted that wash water and rinsate will not be allowed to drain to soil or surface waters.

EMERGENCY RESPONSE EQUIPMENT AND COMMUNICATION

Due to the small size of the facility, routine communication will be accomplished by voice communication. Emergency alarms are available at the return/fill station and tank farm – these alarms can be activated manually and sound off in the office to indicate an emergency situation. High level alarms are available at the tank farm. Telephones are used in case of a spill or fire emergency to summon assistance. Emergency numbers are posted by phones throughout the facility. Included with these phone numbers is the 24-hour Safety-Kleen spill response number. Figure 5.6-1 provides the locations of fire extinguishers, first-aid kits, emergency eyewashes, alarms, and spill equipment. Other emergency response equipment (Table 5.6-1) is kept in a small storage area inside the warehouse. This equipment includes mops and buckets, soap, shovels, and spill sorbent pads. Rubber gloves, boots, pumps, and a wet/dry vacuum cleaner are stored in an emergency supply area near the container storage area. Descriptions and uses of the equipment are provided in Table 5.8-1. Adequate aisle space is provided in the container storage area for movement in an emergency situation. The City of Boynton Beach supplies water for domestic use, decontamination, and fire fighting.

Pails, hoses, and detergents are the primary equipment that will be used for decontamination. The equipment available at the facility for emergency situations is adequate for most cases. Large or serious emergency situations will be remediated by local emergency response teams or special emergency response or cleanup contractors. The facility is constructed and operates in accordance with National Fire Protection Association (NFPA) standards and applicable local ordinances. Applicable health and safety standards are also observed at the facility.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment will be maintained as necessary to assure its proper operation in time of emergency.

FIRE CONTROL PROCEDURES

In the event of a fire at the facility, the following activities will be executed.

Call the Fire Department (page iii). [Note: Center aisles are available in container storage areas to permit fire department personnel to pass with fire fighting equipment.]

Act quickly with the fire extinguisher to put out the fire before it spreads.

Call the Police Department (page iii) to maintain traffic and on-lookers, and local hospital (page iii) to notify the type and extent of injuries, if any.

Ignitable Wastes

All wastes and products are kept away from ignition sources--Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., outside front of facility). The parts washer solvent and paint waste handling areas are separated from the office area to minimize the potential for a fire to spread or injury to personnel to occur.

The tank farm is more than 20 feet from the property line as required in 40 CFR Part 264.198(b).. Likewise, the flammable storage area is 50 feet or more from the property line per 40 CFR Part 264.176. Both of these distances meet the NFPA code for storage of ignitable materials.

Ignitable wastes are handled so that they do not:

1. Become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The parts washer solvents and paint wastes are stored in a tank or in containers, none of which

are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the containers kept at room temperature to minimize the potential for pressure build-up. The tanks are painted white to reflect sunlight and are vented to prevent pressure build-up.

2. Produce uncontrolled toxic mists, fumes, dusts, or gases in quantities sufficient to threaten human health--The vapor pressure of petroleum based parts washer solvent is low (2 mm mercury) and it and the paint waste may react with strong oxidizers and reactive metals only. Toxic mists, fumes, and dusts do not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization is minimal under normal working conditions.

[Note: Drycleaning wastes are initially not flammable, but may produce toxic gases and hydrochloric acid at elevated temperatures (about 1,200°F).]

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See "1" above and "4" below.
4. Damage the structural integrity of the Safety-Kleen facility--The parts washer solvent and paint wastes do not cause deterioration of the tank, drums, or other structural components of the facility.

Incompatible Wastes

Incompatible wastes are segregated in an appropriate manner in accordance with industry standards. All waste or products are kept away from ignition sources. Employees must confine smoking or open flames to designated safe areas.

Materials are handled so they do not:

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

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

External Factors

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

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

4. Flooding - The waste management facility elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.
5. Storms or Cold Weather - The solvent return/fill station, tank storage, and the container storage areas are roofed to eliminate the possibility of rain entering the waste management areas. Neither snow, cold weather, nor stormwater is expected to affect the facility.
6. Hurricanes – Safety-Kleen will adhere to the following procedures in the event of an approaching hurricane:

Hurricane Watch

- A list of employees with telephone numbers is kept on hand. Give each a call-in number for the branch (Branch Manager cell phone or branch number) in the event operations are interrupted.
- Prepare battery-operated radio (if the facility has one) and other equipment in the case of power outage.
- Complete cleanup of facility property – all empty drums, containers, trash containers, chairs, spill kits, etc. should be brought inside the facility structure.
- Facility services should be restricted to local routes (no more than 30-45 minutes from the facility) in case weather conditions deteriorate.
- Ensure any areas which may be exposed to rainwater are clean and secure filling nozzles.
- Route trucks should be re-fueled prior to the storm, emptied of all wastes and product, secure lift gates and side compartments.
- Ensure all bulk collection trucks have off-loaded into the facility storage tank or Bulk Intermodal Distribution Services (BIDS) terminal.
- Move trucks inside building as possible and park the remaining trucks as close to the building as possible (preferably at the bay doors).
- Secure computers, monitors, etc. and wrap in plastic with tape.

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

Hurricane Warning

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

Following Hurricane

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

EVACUATION PLAN

In an uncontrolled emergency, all persons are to be evacuated from the area by means of a verbal cry or use of the public address system. Evacuation routes and the gathering point are noted on Figure 5.1-3 in this plan. The emergency coordinator may elect to use a car horn as a means of emergency notification. A head count will be performed by the emergency coordinator at the gathering point to ensure all personnel, and any contractors or visitors are accounted for.

The Fire Department must be notified at the time of evacuation either from a safe onsite building or neighboring facilities. Clearly marked exits exist in warehouse and office area.

AVAILABILITY AND REVISION OF THE PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

This Plan and all revisions to the Plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed under the Preparedness and Prevention Plan, which may be called upon to provide emergency services. This Plan and all revisions to the Plan are made readily available to employees working at the facility.

This Plan is reviewed and updated, if necessary, whenever:

1. The facility permit is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
2. The list or location of emergency equipment changes;
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that:
 - a. Materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or
 - b. Changes in response necessary in an emergency.
4. The names, addresses, or phone numbers of emergency coordinators change;
5. The employee assigned to each emergency task changes, or
6. The plan fails when implemented in an emergency.

ARRANGEMENTS WITH LOCAL AUTHORITIES

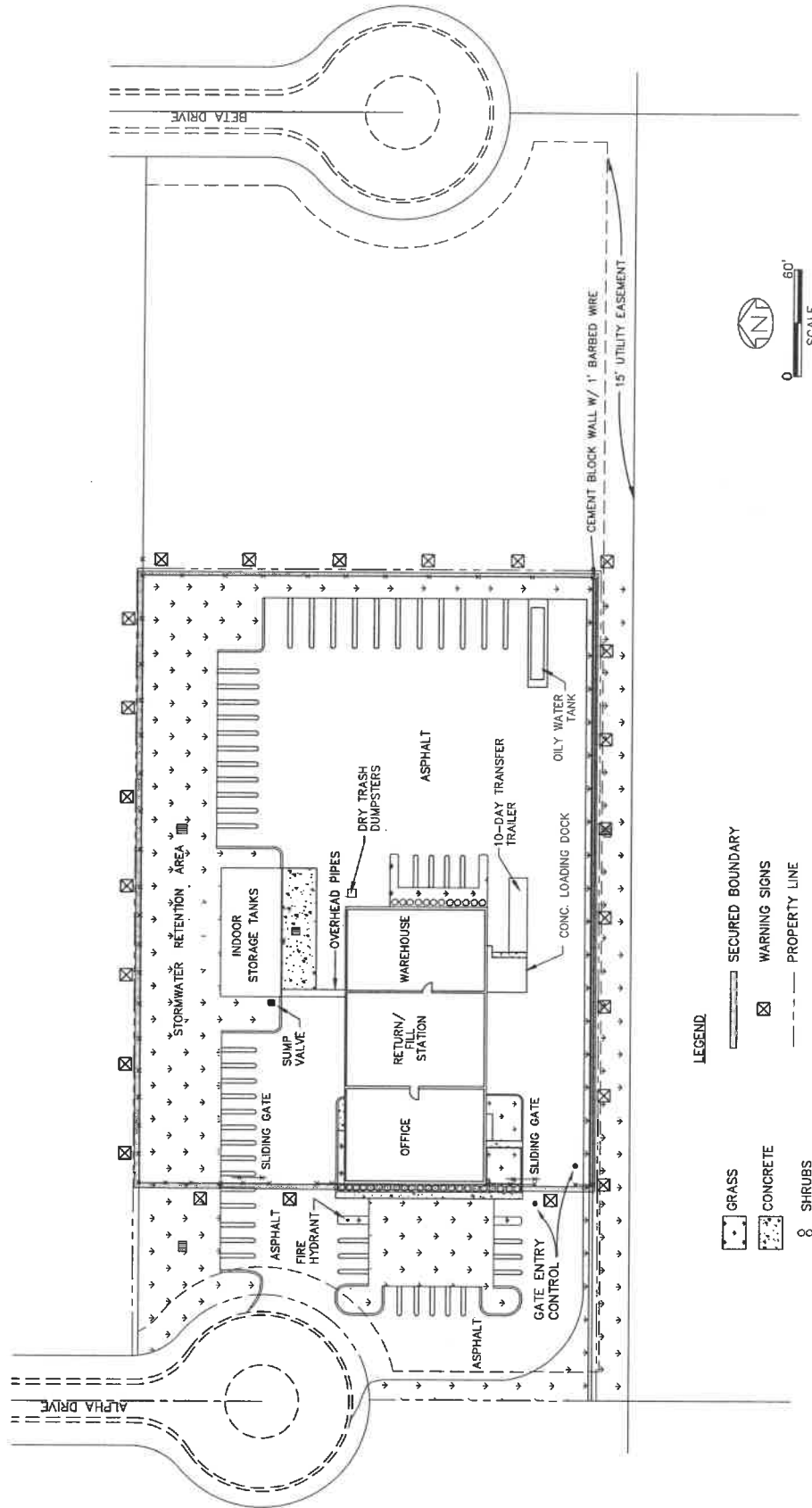
Arrangements have been made to familiarize the Police Department, Fire Department, and local emergency response teams with the layout of the facility, properties of hazardous materials handled (Safety Data Sheets) at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes. The local fire department also conducts periodic fire inspections to ensure we are in compliance, and this also gives the Department an opportunity to familiarize themselves with the layout of the facility in person.

Arrangements have been made to familiarize the local hospital with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which would result from fires, explosions, or releases at the facility.

If such arrangements are refused by local authorities documentation will be kept on file at the facility.

Appendix A of this Plan (located at the end of this section) includes copies of example distribution letters for transmittal. Copies of updated transmittal letters are kept on file at the facility.

FIGURE 5.1-1
FACILITY LAYOUT AND ACCESS CONTROL FEATURES
SAFETY-KLEEN SYSTEMS, INC. FACILITY
BOYNTON BEACH, FLORIDA



- LEGEND
- GRASS
 - CONCRETE
 - SHRUBS
 - STORM DRAIN
 - SIX FOOT CHAINLINK / BARB WIRE FENCE
 - SECURED BOUNDARY
 - WARNING SIGNS
 - PROPERTY LINE

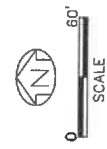
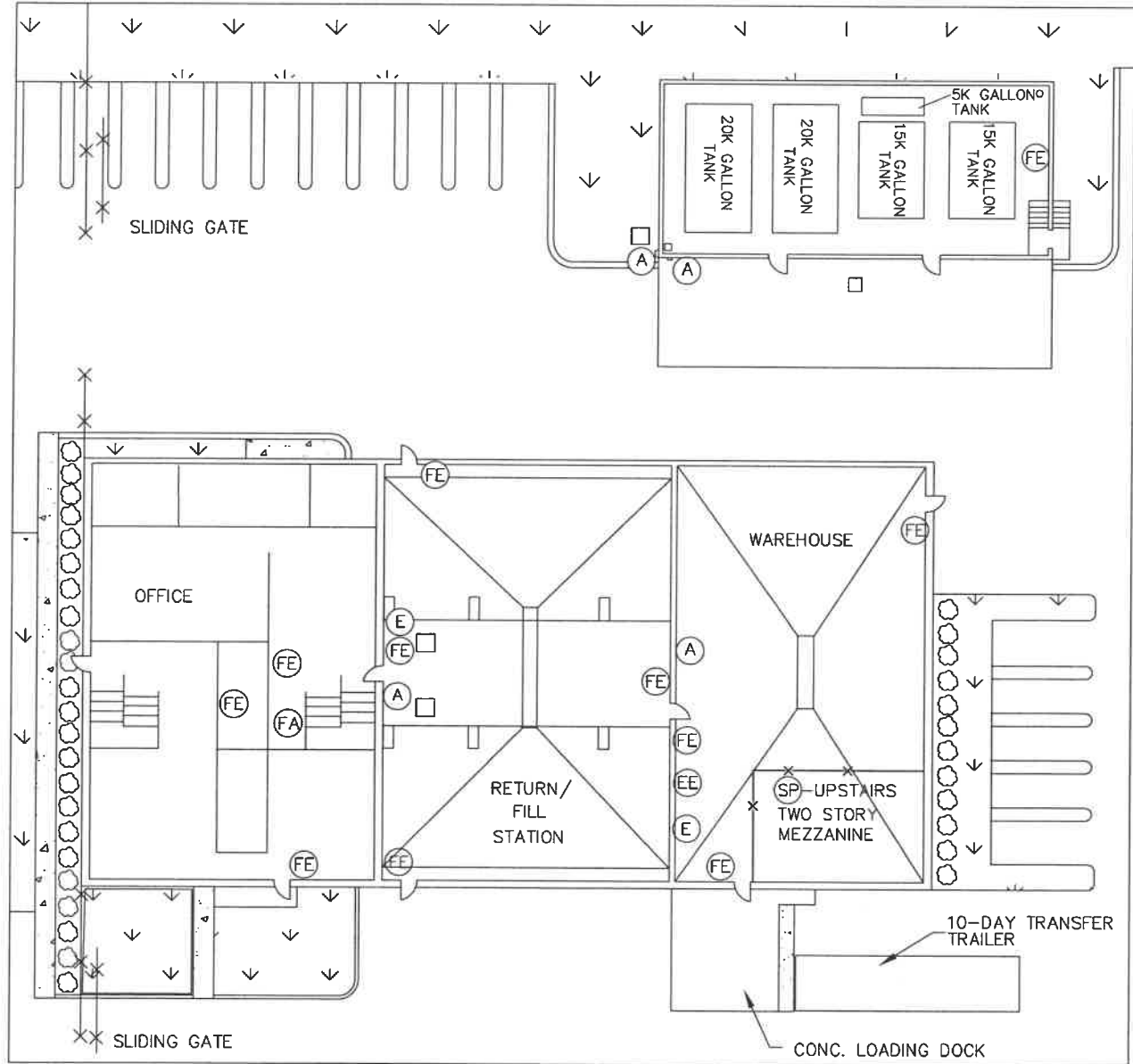


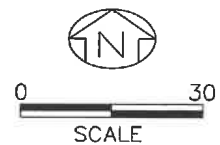
FIGURE 5.6-1
LOCATIONS OF EMERGENCY EQUIPMENT
SAFETY-KLEEN SYSTEMS, INC. FACILITY
BOYNTON BEACH, FLORIDA

REVISION 0 - 05/23/17



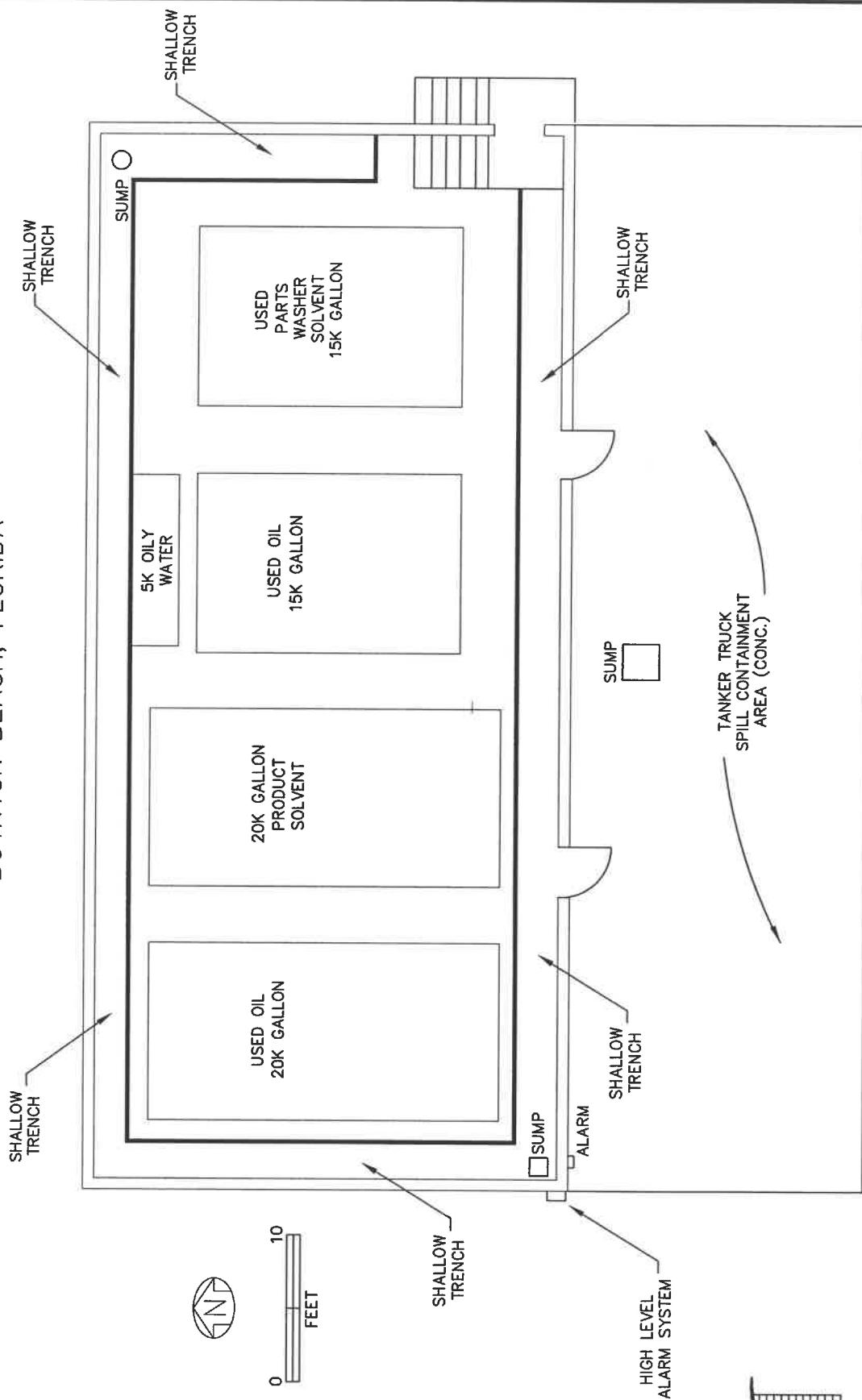
LEGEND

- (FE) FIRE EXTINGUISHER
- (E) EYE WASH/SHOWER
- (A) ALARM
- (FA) FIRST AID KIT
- (EE) EMERGENCY EQUIPMENT AREA
- (SP) SPILL ABSORBENT MATERIAL



ERM.

FIGURE 5.6--5
TANK STORAGE AREA
SAFETY-KLEEN SYSTEMS, INC. FACILITY
BOYNTON BEACH, FLORIDA



NOTE: AN ADDITIONAL TANKER IS USED FOR OILY WATER STORAGE. THIS TANKER IS LOCATED WITHIN A SPILL CONTAINMENT BERM IN THE SOUTHEAST CORNER OF THE FACILITY YARD AREA (SEE FIGURE 2.1-1 OR 5.1-1).

TABLE 5.6-1
EMERGENCY RESPONSE EQUIPMENT

Description	Type/Capacity	Location	Quantity
Fire Extinguisher	ABC (10 lb)	Warehouse	3
		Drum Return/Fill Area	4
		Office (1 st Floor)	3
		Tank Farm Building	1
Eyewash	Fountain	Warehouse	1
		Drum Return/Fill Area	1
First-Aid	OSHA Compliant	Warehouse	1
Telephones	Standard	Managers Office	1
Telephones	Standard	Secretary's Desk	1
Telephones	Standard	Warehouse	1
Intercom	Explosion Proof	All Buildings	N/A
Gloves	Rubber	Emergency Equip Area	Min. 3
Boots (Optional)	Rubber	Emergency Equip Area	Min. 3
Protective Clothing	Apron	Emergency Equip Area	Min. 3
Eye Protection	Goggles/Safety Glasses	Emergency Equip Area	Min. 3
Sorbent Material	Oil Absorbing	Emergency Equip Area	Min. 1 bale
Shovel	Standard	Emergency Equip Area	Min. 1
Mop and Bucket	Standard	Emergency Equip Area	Min. 1
Respirator	Air Purifiers	Employee Locker/Extra respirators are located in the Emergency Equip Area	Min. 3
Pump	Hand-held, Electric	Emergency Equip Area	Min. 1
Wet/Dry Vacuum	Portable, Electric	Emergency Equip Area	1
Water	Fire fighting Sprinkler	All Buildings	N/A
Mercury Decontaminant	HgX	Emergency Equip Area	Min. 1

TABLE 5.8-1

DESCRIPTION AND USES OF EMERGENCY EQUIPMENT

Item	Location	Use/Description
Gloves	Locker Room/Emergency Equipment Area	The rubber of plastisol gloves sold by Safety-Kleen are to be used when handling the solvents.
Safety Glasses or Face Mask	Locker Room/Emergency Equipment Area	To be worn when loading or unloading solvent.
Plastic Aprons	Locker Room/Emergency Equipment Area	For situations where a solvent may get on the workers clothing.
Boots (Optional)	Emergency Equipment Area	Use in case of entering area with high water level
Eyewash/Shower	Return/Fill Station/Container Storage Area	The workers should operate the stand and become familiar with its operation
Showers	Locker Room in office area of building	These are used for emergency and routine cleaning of employees
Fire Extinguisher	See Figure 5.6-1 (Locations of Emergency Equipment)	An ABC extinguisher is a universal system used on paper, wood, and electrical, as well as solvent fires. The extinguishers must be full and carry an inspection tag.
Absorbent Material	Emergency Equipment Area/Upstairs mezzanine area (See Figure 5.6-1 Locations of Emergency Equipment)	An adequate supply will be on hand to handle small spills. A 50 lb bag will also be kept in the warehouse to remediate and prevent spread of large spills
Air Purifying Respirator	Employee Lockers/Extra respirators are kept in the Emergency Equipment Area	Worn by any person entering an area or performing work where potentially harmful fumes are present or suspected to be present but not considered to be immediately dangerous to life and health
Portable Pumps Wet/Dry Vac	Warehouse	For use in picking up liquid spills in the container containment area, or other paved areas, and transfer materials associated with spills
Recovery Containers	Warehouse	Emergency storage of spilled product, cleaning fluids, or other materials associated with spills
Plastic	Warehouse	Used for containment of decontamination zones
Duct Tape	Warehouse	Taping of protective clothing, plastic, and other uses
First-aid	Locker Room	Minor first-aid needs and health problems
Shovels/Mops	Warehouse	Used to collect spills and residue
Communication Equip	Facility Wide	Phones with intercom systems in office/warehouse for internal and external communications
Decon. Equip.	Warehouse	2 brushes, box of detergent, rags, available for decon of clean up equip.
Mercury Decontaminant HgX	Emergency Equip. Area	Used to cleanup releases from mercury-containing lamps and devices

3. Branch Generated Liquids/Solids (Debris)/Dumpster Sediment – In the course of day-to day operations, the Branch generates waste associated with sampling customers' waste and branch activities. Such wastes may include wipes, gloves, etc. In addition, liquid wastes may be generated as a result of decontaminating sampling equipment. The dumpster sediment chemical composition is analogous to that of the solvent tank bottoms. These containers are stored in the container storage area. The facility ultimately ships these materials to a permitted Safety-Kleen/Clean Harbors TSDF or other permitted facility for disposal. This waste stream is not sampled/analyzed, a "worst case scenario" is assumed. For appropriate waste codes, see the Table above on page 1.
4. System One Type Parts Washers (recycling units) – These types of parts washers build up oil/sludge in the distillation unit of the machine. This material is not sampled/analyzed as part of SK's annual re-characterization program, and are managed according to the customer's waste determination.

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

Wastes Resulting from the Dry Cleaner Service

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

The dry cleaning process may produce three waste streams.

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

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

Samples included in the AR process are selected from random customers serviced by Safety-Kleen facilities. Randomness is overseen by the Safety-Kleen Technical Center, which manages the AR program, selecting the month that the samples will be taken. A list of waste streams included in the AR is found below on page 9. The analytical results of the AR are communicated to customers to assist them in making a waste determination, while they also consider their specific generation process. In the case parts washer solvent, if a customer determines specific waste codes apply to their spent parts washer solvent then these codes will be used when servicing the parts washers. Generator services are typically scheduled months in advance and those clients whose waste happens to be on hand on the month selected by the Technical Center will be the wastes that will be sampled. See Exhibit C-2 for sampling locations from 2003-2013.

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

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

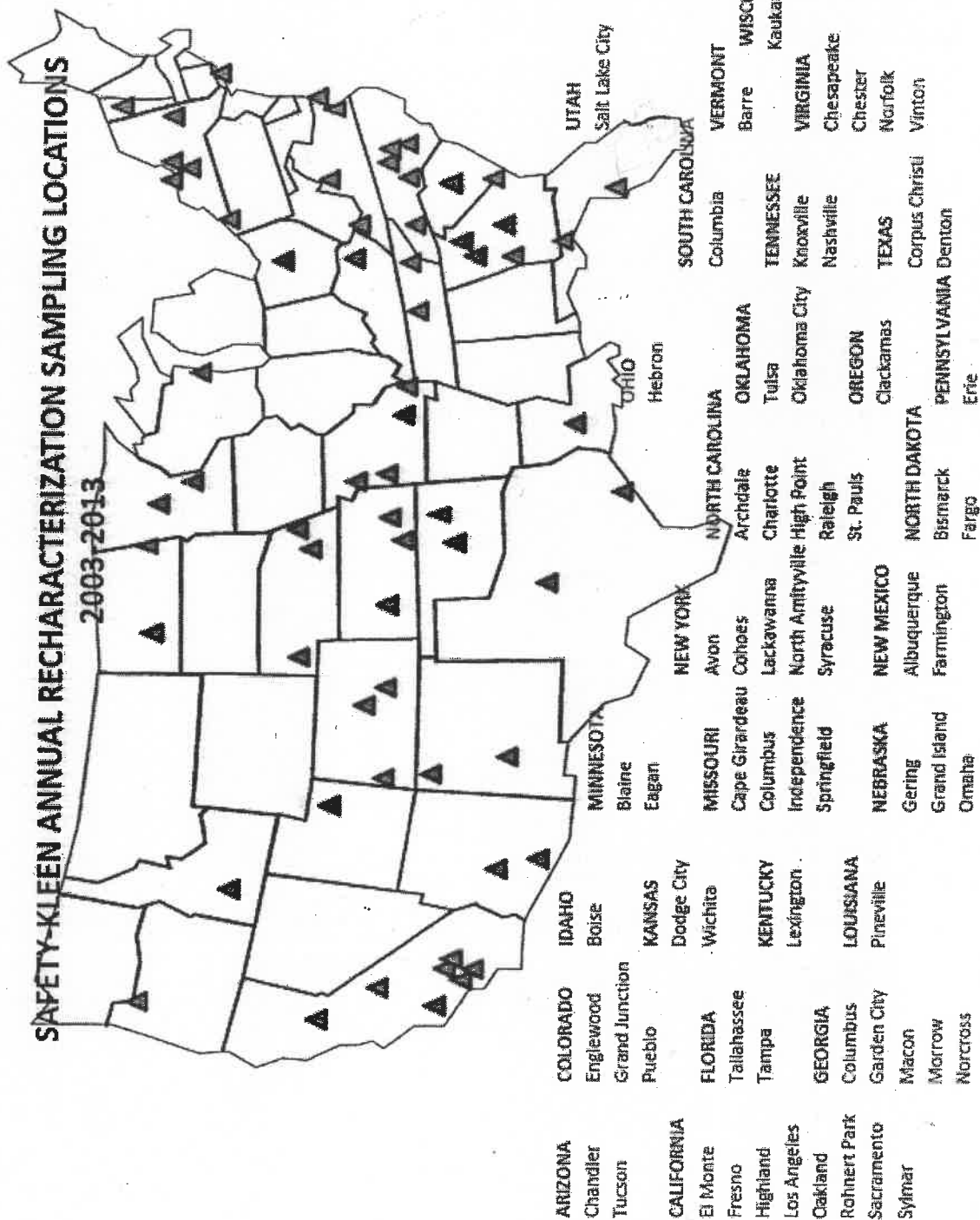
In reviewing with Dr. Gibbons how the number of data points was derived he wrote in a recent email ... *“This is a nonparametric upper confidence limit (see Gibbons, Bhaumik and Aryal, 2010 section 18.7) which is defined by an order statistic (i.e. a rank) of the data. There is nothing magical about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

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

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

SAFETY-KLEEN ANNUAL RECHARACTERIZATION SAMPLING LOCATIONS

2003-2013



INCOMPATIBLE, IGNITABLE, AND REACTIVE WASTE MANAGEMENT

All materials are managed in accordance with the local fire protection code and fire department recommendations. All ignitable wastes are stored at least 50 feet from the property line. The facility does not routinely manage unwashed containers that may previously have held materials that would be incompatible with wastes stored at the facility. Also, the used parts washer solvents and used aqueous parts washer solvents consist of materials that are compatible and suitable for bulking. Wastes are stored primarily in polyethylene and steel containers. Immersion cleaner, dry cleaning, paint waste, and FRS waste containers are never opened at the Branch. Overpack containers are used for the management of containers whose integrity has been compromised. For ease of inventory control and product integrity, separation and grouping of both used and unused solvents is a standard practice at the Branch. All containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications.

Procedure for Managing Waste Types

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

Incompatible Waste/Special Waste Segregation

If a waste container requiring segregation is collected and transported to the branch (i.e., oxidizer); branch personnel would follow the following procedures while this container moves through the facility. The container would be placed separately on a self-contained spill containment pallet, and moved into the transfer storage area. Absorbent boom would be placed at the base of the spill containment pallet, and an area of at least 5 ft. cleared on all sides of this pallet to ensure no other incompatible material(s) (flammables/combustibles, organic chemicals, reducing agents) can be stored near, or come into contact with the material.

coating. The hazardous waste solvent tank has been fitted with a Moormann Analog Automatic Tank Gauge (information on the gauge is provided at the end of this section). Level gauges are used to measure liquid levels in tanks. Float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tanks being 95% full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. The gauges of the tank are read before filling the tank with additional material. Tank level readings are also taken prior to the filling of a tanker truck to prevent overfilling of the truck or 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 above-ground tanks. The tank should be operated at a maximum volume of 14,250 gallons (95% of capacity). The secondary containment under the tanks and return/fill station is cleaned within 24 hours of a spill, or in as timely a manner as possible, to prevent harm to human health and the environment.

2" single-walled steel piping from the wet dumpsters in the return/fill area to the top of the hazardous waste solvent tank is connected by threaded connectors. This piping runs under the dock and leaves the Return/Fill station on the north side of the building. At that point, the piping system continues north towards the tank farm and is outside secondary containment (this part of the system has welded connectors). Once it reaches tank farm secondary containment the piping, with threaded connectors, runs vertical to the top of the tank. The piping system leaving the tank is constructed of 3" single-walled steel and is inside secondary containment. Figure 9.1-1 details the system.

Leak Detection System

The Safety-Kleen Boynton Beach branch has installed an automatic leak detection system at the above ground storage tank farm for the hazardous waste solvent tank. This system will enable detection of leaks, or releases, to the secondary containment 24-hours a day. The system consists of an Intellipoint sensor, which is placed at the base of the

Subsequent Reporting

Subsequent reporting will be completed as referenced in the facility Contingency Plan.

Repair or Closure

If the integrity of the containment system has not been damaged, the system may be returned to service as soon as the released waste is removed and repairs, if necessary, are made. If the tank was the source of the release, the tank must be repaired prior to returning the tank system to service. If the release was from a tank system component which did not have secondary containment, then secondary containment must be provided for this component before the system can be returned to service. The exception to this is if the component can be visually inspected. In this instance, the component may be repaired and returned to service. If a component is replaced, the component must satisfy the requirements for new tank systems and components.

All major repairs must be certified by an independent, registered, professional engineer in accordance with 40 CFR 264.196(f). The engineer must certify, in accordance with 40 CFR 270.11(d), that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. This certification must be placed in the operating record and maintained until closure of the facility.

If repairs that meet these requirements cannot be performed, the tank system must be closed in accordance with the closure plan.

Part II

K. CLOSURE PLAN

Safety-Kleen constructed the Boynton Beach Branch with the intent that it will be a long-term facility for the distribution of Safety-Kleen products. No on site disposal activity occurs at the facility and, hence no disposal capacity will be exhausted that will necessitate closure of the facility. Based on current business and facility conditions, the Boynton Beach facility is expected to remain in operation at least until the year 2035. In the event that some presently unforeseen circumstance(s) would result in the discontinuance of operations and permanent closure or sale of the facility, this closure plan identifies the steps necessary to close the facility at any point during its intended life. This plan should be applied to the tanks system, container storage areas, and equipment used by the facility for hazardous waste management to accomplish the closure performance standard of 40 CFR 264.111. It is intended that all closures will be complete and final with removal of waste and decontamination of the facility and associated equipment. This will eliminate the need for maintenance after closure and the possibility of escape of hazardous waste constituents into the environment. Because closure is not anticipated for some time Safety-Kleen agrees to notify the Department when this decision is made to work with FDEP to update the closure plan using the most current requirements and FDEP guidance documents.

FACILITY DATA

1. Waste Management Facility Descriptions

- a. Aboveground Storage Tank: The tank is a 15,000-gallon horizontal steel tank, 12' diameter x 18' length, for storage of used parts washer solvent. This tank is located within a containment system consisting of a 71' x 32'4" x 6" foundation slab, surrounded by a 36" concrete dike in an enclosed building.
- b. Solvent Return/Fill Station: The station is a 45' x 44' structure within the main branch building, located between the office area and main warehouse. It contains two wet dumpsters. The two active dumpsters are used to receive returned solvent from containers and pump it to the used parts washer solvent tank. These dumpsters are not intended for storage, but can hold a max. of 275 gals (each).

- c. Container Storage Area: The container storage area is a 48' x 79' ft. area with a sloped floor and secondary containment collection trench. The maximum storage capacity is 29,720 gallons with 6,912 gallons of hazardous waste container storage. Containerized waste to be stored in this area will consist of used oil filters, paint wastes, branch generated debris, dry cleaning waste, spent immersion cleaner, and any overflow transfer waste if necessary.
2. Maximum Inventory of Wastes
 - a. Used Parts Washer Solvent: 15,000 gallons
 - b. Wet Dumpsters: 550 gallons
 - c. Containerized Waste: 6,912 gallons. (Note: This includes any combination of 5, 16, 30, 55, 85-gallon containers, and 350-gallon totes used for various management purposes).

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

CLOSURE PROCEDURES

Container Storage Areas

- At closure, all containers present at the facility will be sent to a Safety-Kleen or Clean Harbors TSDF, or permitted third party facility where the contents in the containers will be reclaimed and the containers cleaned for reuse. The containers will be removed and transported with proper packaging, labeling, and manifesting.
- The concrete floor, spill containment area, and walls will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. Final rinsate samples will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, rinsate samples will be collected from the container storage area. The rinsate samples will be analyzed by EPA method 6010 for

the eight RCRA metals and nickel, and for volatile and semi-volatile organics by EPA methods 8015, 8260, and 8270. The area will be decontaminated to meet FDEP's guidance at the time of closure. Decontamination of the mercury-containing lamps and devices storage area will be conducted at the time of closure as part of the overall decontamination of the container storage areas.

- Decontamination (i.e., detergent wash and clean rinse) fluids will be collected and contained for proper management. One representative sample of the contained fluids will be collected to determine whether the water is hazardous. This determination will be made by laboratory analysis of the sample for the metals and organics (excluding pesticides/herbicides) on the TCLP list. (Note: This wash water will be from all areas undergoing decontamination, not just from the container storage areas.)
- If the wash water or other wastes generated in the closure process are determined to be hazardous, they will be disposed of properly as a hazardous waste. Otherwise, the material will be disposed of as an industrial waste. Assumptions of wash water generation are based on Safety-Kleen's past experience from other facility closures. The generated wash water is expected to be non-hazardous based on Safety-Kleen's experience from other facility closures.
- Equipment to be used to clean this area includes mops, pails, scrub brushes, a wet/dry vacuum, and containers. The mops, pails, and scrub brushes will be containerized and disposed of as hazardous waste. The wet/dry vacuum and containers used will be washed with a detergent solution and rinsed to decontaminate them.

Solvent Return/Fill Station

- At closure, any sludge in the wet dumpsters (“dumpster mud”) will be cleaned out and containerized, labeled, and manifested for proper disposal.
- The metal superstructure components of the station (i.e., the wet dumpsters and the dock grating) will be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle these components as scrap metal in accordance with 40 CFR 261.6(a)(3)(ii), or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of the components is required only to the extent necessary for safe demolition, storage, and transportation of the scrap.
- The concrete floor in the return/fill station will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the container storage area rinsate sample. The area will be decontaminated to meet FDEP’s guidance at the time of closure.

Aboveground Storage Tank System

Note: The product solvent & used oil tanks will be closed in accordance with Chapter 62-762, F.A.C.

Metal Components of the Tank Storage System

- At closure, the contents of the tank will be removed to a tanker truck using existing unloading equipment and subsequently transported to a Safety-Kleen recycle center, or 3rd party facility.

- Once the contents have been drained, the tank will be opened by removing the manways and vented by supplying fresh air to the interior space of the tank. Any residual wastes will be removed via vacuum for recycling with the previously drained wastes.
- The interior of the tank as well as all associated piping and appurtenant equipment will then be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle the tank, piping, and appurtenant equipment as scrap metal in accordance with 40 CFR 261.6(a)(3)(ii), or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of the metal components is required only to the extent necessary for the safe demolition, storage, and transportation of the scrap.

Concrete Containment System

- Final disposition of the concrete containment system where the waste solvent tank is located will depend in part upon the presence or absence of underlying soil contamination. To make that determination, the upper six inches of soil immediately below the concrete slab will be sampled at the following locations, as follows:
 1. Under the waste tank, and at the containment system sumps;
 2. Beneath the most prominent of any cracks observed in the slab, and under the tanker connections.
 3. The rainwater discharge area in the stormwater retention area.
- Sampling locations, and the number of samples required will ultimately be determined after consultation with the Department
- These sample locations may be adjusted as actual field conditions warrant, but a minimum of two samples will be retrieved. These samples will be analyzed for petroleum constituents, and by EPA Method 6010 for the eight RCRA metals and nickel, and for volatile and semi-volatile organics by EPA Methods 8015, 8260, and 8270.

- The perimeter walls and foundation slab of the secondary containment area will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the container storage area rinsate sample. The area will be decontaminated to meet FDEP's guidance at the time of closure. Safety-Kleen anticipates that proper maintenance of the concrete containment system will allow the slab to remain in place at closure.
- If required, Safety-Kleen will proceed with demolition of the perimeter walls. If it is determined that soil contamination exists beneath the foundation slab, Safety-Kleen will demolish the entire concrete structure and complete a further delineation of the extent of soil contamination to be removed to complete closure. Any site assessment, interim measures, or corrective action that may be required will be conducted in accordance with Chapter 62-780, F.A.C. and permit requirements.
- Prior to demolition of the perimeter walls, one representative composite sample of the construction materials will be collected and submitted for analyses (by TCLP) of metals and organics (excluding pesticides and herbicides) unless an alternate analytical protocol is required by the selected disposal facility. The representative composite sample will include biased grab samples collected from areas of staining. If no stained areas are evident, the grab sample locations will be randomly selected. If the construction materials are classified as non-hazardous using TCLP, then they will be disposed of as construction debris in an appropriately permitted disposal facility. In the event the construction materials are identified as hazardous using TCLP, the construction materials will be disposed of as a hazardous waste in accordance with RCRA regulations.
- If the foundation slab must be removed, it will be demolished and the construction materials tested using TCLP in the same manner as that described above for the walls of the secondary containment system.

- If soil removal becomes necessary, Safety-Kleen will backfill the excavated area with clean, compacted general fill material graded to match existing surfaces and to preclude ponding of water. To ensure backfill is clean (i.e., is not contaminated with constituents at concentrations above Florida soil cleanup goals or site background (whichever is higher)), one representative composite sample of the backfill sample will be analyzed by EPA Method 6010 for the eight RCRA metals and nickel, and by EPA Methods 8015, 8260, and 8270.

All sampling and analyses will be done in accordance with FDEP Standard Operating Procedures (SOPs).

FACILITY CLOSURE SCHEDULE AND CERTIFICATION

- Safety-Kleen may amend the closure plan at any time during the active life of the facility. The active life of the facility is that period from initial receipt of hazardous waste to certification of final closure. Safety-Kleen will amend the plan any time changes in operating plans or facility design affect the closure plan or whenever a change occurs in the expected year of closure of the facility. The plan will be amended within 60 days of the changes.
- Safety-Kleen will notify the FDEP of its intent to close the facility in accordance with Chapter 62-730.240, F.A.C.
- Safety-Kleen will remove from the site all hazardous wastes in accordance with the approved closure plan. The Regional Administrator may approve a longer period if Safety-Kleen demonstrates that:

The activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete; or

1. The following requirements are met:
 - a) The facility has the capacity to receive additional wastes;
 - b) There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;

- c) Closure of the facility would be incompatible with continued operation of the site; and
 - d) Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen will complete closure activities in accordance with the approved closure plan within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, whichever is later. When closure is completed, all facility equipment and structures shall have been properly disposed of, or decontaminated by removing all hazardous waste and residues.
 - Within 60 days of closure completion, Safety-Kleen will submit certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

Figure 10.3-1 presents a typical closure schedule anticipated for the Boynton Beach facility.

CONTINGENT POST-CLOSURE PLAN

The tank system at the Boynton Beach facility meets the secondary containment requirements of 40 CFR 264.193, and is, therefore, not required to have a contingent post-closure plan under 40 CFR 264.197(c). In addition, Safety-Kleen intends to remove or decontaminate all tank system components, associated containment systems, and contaminated soils (if any) at the time of closure. However, should future conditions indicate that all contaminated soils and tank system components cannot practicably be decontaminated or removed, then a plan to perform post-closure care in accordance with the post-closure care requirements that apply to landfills (40 CFR 264.310) will be prepared for implementation upon FDEP approval.

CLOSURE COST ESTIMATE

The cost for closure of the facility is estimated in the CCE worksheets and summarized as follows:

• Inventory Removal	\$33,708
• Storage Tank Decontamination	\$16,646
• Decontaminate The Return/Fill Station	\$18,873
• Decontaminate Container Storage Area	\$12,302
• Containerize, Stage, Transport and Dispose of Decon Wastes	\$21,192
• Closure Certification Report	\$12,354
 Subtotal	 \$115,075
15% contingency	\$17,261
2017 CCE including inflation adjustments	\$132,336

TABLE 11.2-2
SUMMARY OF CONTAINER MANAGEMENT UNITS SUBJECTED TO SUBPART CC
SAFETY-KLEEN SYSTEMS, INC. BOYNTON BEACH, FL
EPA ID NUMBER: FLD 984 167 791

Hazardous Waste Management Unit	Location of Hazardous Waste Unit	EPA Hazardous Waste Codes Managed	Brief Waste Description	Average Volatile Organic Concentration of Hazardous Waste	Container Type	Subpart CC Status	Control Option (See Table 11.2-3)
Container Storage Area	See Figure 2.1-3	D001, F001, F002, F003, F005 and codes listed in Note 1 below	Waste Parts Washer Solvent (Petroleum Naptha), Dry Cleaner Wastes	> 500	Type A	Container Level 1 Controls per 264.1086(c)	11
Return and Fill Area	See Figure 2.1-3	D001 and codes listed in Note below	Waste Parts Washer Solvent (Petroleum Naptha)	> 500	Type A	Container Level 1 Controls per 264.1086(c)	11

Note: D004 thru D011, D018, D019, D021 thru D030, and D032 thru D043

Table 11.2-3

Subpart CC Control Options

Containers

8. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and meet the applicable US DOT regulations under the Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1) & (c)(1)(i)]
9. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(i) & (c)(1)(i)]
10. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and are open-top containers in which an organic-vapor surpressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(i) & (c)(1)(iii)]
11. These containers have a design capacity greater than 0.46 m³, are not in light material service and meet the applicable US DOT regulations under Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(i)]
12. These containers have a design capacity greater than 0.46 m³, are not in light material service and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(ii)]
13. These containers have a design capacity greater than 0.46 m³, are not in light material service and are open-top containers in which an organic-vapor surpressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(iii)]
14. These containers have a design capacity greater than 0.46 m³, are in light material service and meet the applicable US DOT regulations under Container Level 2 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(iii) & (d)(1)(i)]



8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division-HWRS, MS4560
2600 Blair Stone Rd. Tallahassee, FL 32399-2400
(850) 245-8707

Date Received
(for FDEP Official Use Only)

JUL 28 2017

PERMITTING & COMPLIANCE

EPA ID:

F L D 9 8 4 1 6 7 7 9 1

Please use the instructions document to complete this form

1. Reason for Submittal

(all submitters must complete pages 1 and 2 and sign page 5.

Pages 3 and 4, - complete as applicable)

Mark 'X' in the correct box:

(must choose one if a notification)

☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, used oil activities, or PCW activities).

☒ To provide subsequent notification (to update status and facility identification information).

☐ To provide the final notification (closing) for the facility. (see instructions—must complete pages 1,2,5)

FL Registration(s)

☐ UW Mercury (see page 3)

☐ HW Transporter (see page 4)

☐ Used Oil (see page 4)

2. Facility or Business Name

Safety-Kleen Systems, Inc.

3. Facility Operator

(List additional Operators in the comments section).

Name of Operator:

Safety-Kleen Systems, Inc.

Date became Operator: 08 / 26 / 1991

☐ New Operator mm dd yy

Street or P.O. Box:

5610 Alpha Drive

Phone Number:

561-736-1339

City or Town:

Boynton Beach

State:

FL

Zip Code:

33426

Country (if not USA):

Operator Type:

☒ Private

☐ Federal

☐ Municipal

☐ State

☐ County

☐ Other

4. Facility Physical Location Information

(No P.O. Boxes)

☒ Same address as #3 above or:

Physical Street Address:

☐ Vessel

City or Town:

State:

Zip Code:

County:

Palm Beach

Country (if not USA):

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

A. 5 6 2 1 1 2 (required)

B.

C.

D.

6. Facility or Business Mailing Address

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

City or Town:

State:

Zip/Postal Code:

Country (if not USA):

7. Facility or Business RCRA Contact Person

☒ Same address as #3 above or:

First Name:

Jeff

Last Name:

Curtis

Title:

EHS Manager

Phone Number:

561-523-4719

Extension:

E-Mail:

jeff.curtis@safety-kleen.com

Fax:

561-731-1696

Street or P.O. Box:

City or Town:

Richardson

State:

Zip Code:

Country (if not USA):

8. Real Property (FL Land) Owner of the Facility's Physical Location

(List additional owners in the comments section.)
☐ Same address as # above or:

Name of Owner:

Safety-Kleen Systems, Inc.

Date became Owner: 08 / 26 / 1991

☐ New Owner mm dd yy

Street or P.O. Box:

2600 North Central Expressway, Suite 200

Phone Number:

972-265-2000

City or Town:

Richardson

State:

TX

Zip Code:

75080

Country (if not USA):

Owner Type:

☒ Private

☐ Federal

☐ Municipal

☐ State

☐ County

☐ Other

9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):**(A) (1) Generator of Hazardous Waste**☒ Yes ☐ No (Do not include Universal Waste or Used Oil)

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

- ☒ **a. Large Quantity Generator (LQG):**
Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of non-acute hazardous waste; or Greater than 1 kg (2.2 lbs) of acute hazardous waste (at least once a year)

- ☐ **b. Small Quantity Generator (SQG):**
Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste (at least once a year)

- ☐ **c. Conditionally Exempt SQG (CESQG):**
Generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs) or less of acute hazardous waste

In addition, indicate other generator activities that apply.

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

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

(2) Treater, Storer, or Disposer of Hazardous Waste:

(at your facility) Note: A hazardous waste permit may be required for this activity.

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

(3) ☐ Recycler of Hazardous Waste (at your facility)Specify: ☐ Commercial ☐ Non-Commercial.

Note: A permit is required for storage prior to recycling.

(4) ☐ Exempt Boiler and/or Industrial Furnace

- ☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining Furnace Exemption

(5) ☐ Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities

Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.

(6) ☒ Receives Hazardous Waste from Off-Site**(7) ☐ Underground Injection Control**

10. Waste Codes for Federally Regulated Hazardous Wastes: List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, K019, P012, U112).
Hazardous waste transporters list codes routinely or usually transported. Use comments or an additional page if more spaces are needed.

¹ D001	² D002	³ D003	⁴ D004	⁵ D005	⁶ D006	⁷ D007
⁸ D008	⁹ D009	¹⁰ D010	¹¹ D011	¹² D018	¹³ D019	¹⁴ D021
¹⁵ D022	¹⁶ D023	¹⁷ D024	¹⁸ D025	¹⁹ D026	²⁰ D027	²¹ D028

11. Other Status Changes (If no longer handling waste or closed, sections 9 and 10 should be blank and skip Section 12-16):**(A) Non-Handler of Regulated Waste at This Facility** (Sections 9, 10 and 12-16 should be blank.)

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

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

- ☐ (1) Closed at this location and moved or moving to another - Submit a new Form 8700-12FL for the new location if you will
☐ (2) Out of Business - Business closed on _____ (date)

☐ **(C) Property Tax Default**☐ **(D) Petition for Bankruptcy Protection****12-14 — Registration Activities Contact Information** (only if this submission is a registration or registration information update):

<input type="checkbox"/> Same as Facility RCRA Contact on page 1 or enter: Contact for: <input type="checkbox"/> HW Transporter <input type="checkbox"/> Used Oil Handler <input type="checkbox"/> Universal Waste	First Name:	Last Name:		Title:	
	Phone Number:	Extension:	E-Mail:		
	Street or P.O. Box:				
	City or Town:		State:(Country):		Zip Code:

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

Transporters of and Transfer Facilities for Hazardous Waste in the State of Florida are required to register and annually renew their registration. Evidence of casualty/liability insurance pursuant to 62-730.170(2)(a) is required in addition to this registration. Transfer facilities must submit several additional documents as detailed on page 5 the first time they register and when the information changes. Registered transporters and transfer facilities may only begin operations after receiving approval from the Department. **Generators of hazardous waste who transport waste only within the boundaries of their facility should not register.**

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

This facility is a registered transporter of hazardous waste.

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

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

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

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

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

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

Note: Hazardous Waste transfer facilities must comply with the requirements of Rule 62-730.171, F.A.C., and Rule 62-730.182, F.A.C.

The Transfer Facility records required under the provisions of Rule 62-730.171(6), F.A.C., are kept at (check one):

☐ Our mailing (business) address ☐ The site (facility) address

Please enter the EPA ID Number of the HW Transporter who carries the insurance for this Transfer Facility:

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Please see the top of page 5 for additional items that must be submitted in addition to the above registration for Hazardous Waste Transfer Facilities [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

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

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

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

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

(1) Used Oil Transporter - mark activities: (occurring in Florida)

- ☐ a. Transporter (off-site) and noncontiguous locations
☐ b. Transfer Facility

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

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

(4) ☐ Off-Specification Used Oil Burner

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

(6) Used Oil Filter Management (must annually register)

- ☐ a. Transporter
☐ b. Transfer Facility
☐ c. Processor (Annual Report Required)
☐ d. End User

(7) The records required under the provisions of Rule 62-710.510, FAC, are kept at (check one):

☐ Our mailing (business) address ☐ The site (facility) address

Please see the top of page 5 for additional items that must be submitted in addition to the above registration and fees required for non-exempt Used Oil Transporters.

(14 cont.) Hazardous Waste Transfer Facilities: In addition to the registration required for Transfer Facilities on Page 4, Section 14, the following items are required to be submitted with the initial notification for a transfer facility and any changed items must be submitted with any subsequent submission [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)] :

- ☐ Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]
- ☐ Evidence of the transporter's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]
- ☐ A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]
- ☐ A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]
- ☐ A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]
- ☐ A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]

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

In addition to the requirements on Page 4 Section 15:

- ALL registered UO Handlers must submit an annual report except generators transporting UO from noncontiguous operations within their own company.
- UO transporters transporting off-site over public highways only within their own company must submit proof of insurance.
- UO transporters transporting more than 500 gallons/year must submit proof of insurance annually, and must sign and certify this submission as a certified used oil transporter in section 17 (except those exempted by Rule 62-710.600(1), F.A.C.).


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

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

#10. Waste Code list continued: D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, F005

17. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

☒ I certify as a Used Oil Transporter that I am familiar with the applicable Florida and Federal laws and rules governing used oil transportation and have an annual and new employee training program in place covering the applicable used oil rules. Evidence of financial responsibility is demonstrated by the Used Oil Transporter Certificate of Liability Insurance, DEP form 62-730.900(5)(a), F.A.C..

Signature of owner, operator, or an authorized representative	Print Name and Title	Used Oil	Date Signed (mm-dd-yyyy)
	Jeff Curtis EHS Manager	<input checked="" type="checkbox"/>	07/25/2017
		<input type="checkbox"/>	
		<input type="checkbox"/>	

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

(Name of person completing this form)

(Phone Number)

(E-mail Address)