

Directions for revising Part B renewal application.

(SUPP File)

RCRA Permitting Routing Slip

Facility Name: Safety-Kleen, Boynton

PATS No.: H050-195905

<u>TO</u>	<u>NAME</u>	<u>INITIALS</u>	<u>DATE</u>
	KASTURY , Satish		
	Ashwood, Janet		
	McGriff, Juliette		
	Outley, Debra		
	RUSSELL , Merlin		
	Bland, Susan		
	Graves, Shelton		
	James, David		
	Kaharoeddin, Ami		
	Madrid, Nicanor		
	Papp-Wells, Joyce		
	Smith, Cindy		
	Stein, Camille		
<input checked="" type="checkbox"/>	OUTLAW , Doug	DW	5/8/97
	Budeir, Maher		
<input checked="" type="checkbox"/>	Griffin, John	BJ	5/8/97
	Kothur, Bheem		
	Owutaka, Alex		
	Prusty, Rabin		
	Ryan, Aine		
	Schroeder, Pat		
	Singh, Harbhajan		
	Vaught, Tracie		
	OTHER		

REQUIRED ACTION & COMMENTS:

PROJECT MANAGER: Kothur
LOGGED IN:

Directions for Revising Part B Renewal Application

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Add the drawings and copies of photographs (12 pages), behind page I.B.3-2.

Add the Emergency Phone Numbers, page II.A.4(b)-3a, behind page II.A.4(b)-3.

Discard page II.A.4(b)-4. Replace with revised page, same #.

Discard page II.A.4(b)-14. Replace with revised page, same #.

Add Figure II.A.4(b)-2, behind page II.A.4(b)-14.

Discard pages II.A.4(d)-4 through II.A.4(d)-11. Replace with pages II.A.4(d)-4 through II.A.4(d)-10.

Discard pages II.A.4(e)-1 through II.A.4(e)-7. Replace with revised pages, same #s.

Discard pages II.B.4-1 through II.B.5-2 (four pages).

Add Figure II.C.2-1, behind page II.C.2-1.

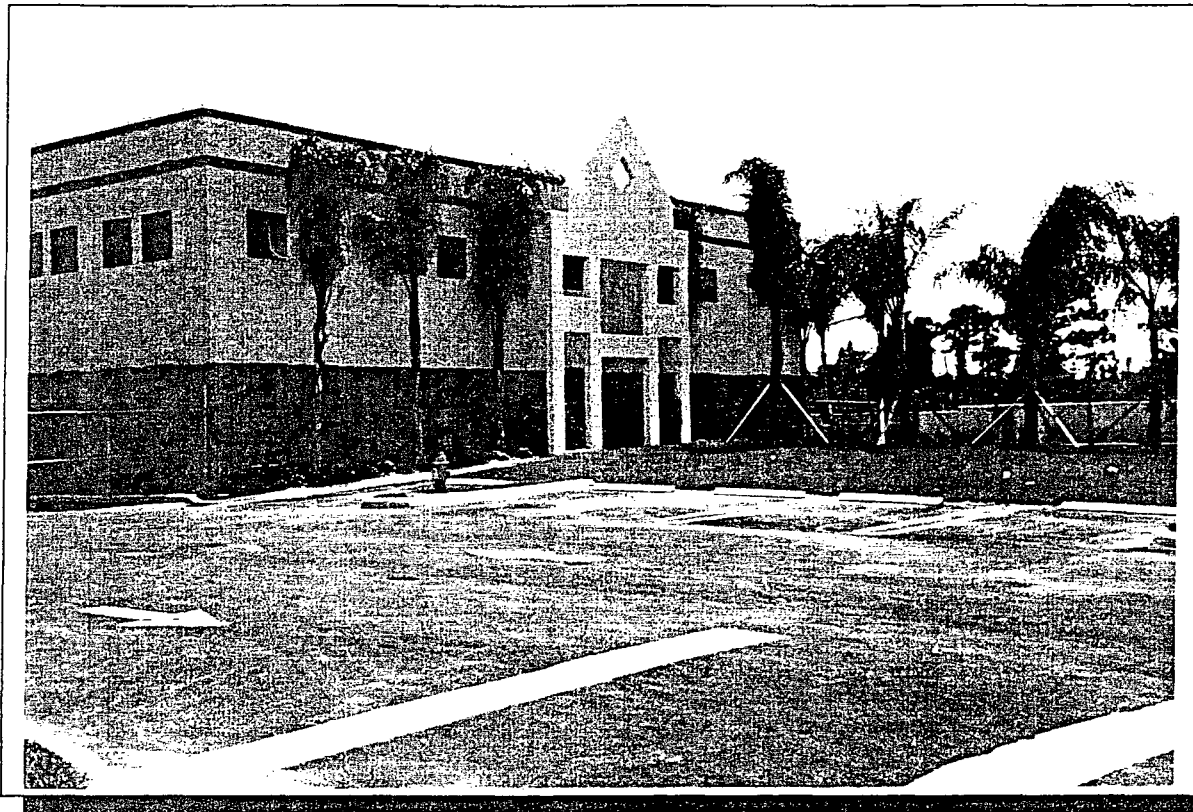
Discard page II.C.11-1A. Replace with revised page, same #.

Behind tab "Division IV", discard list of permit mods (2 pages). Replace with new list (1 page).

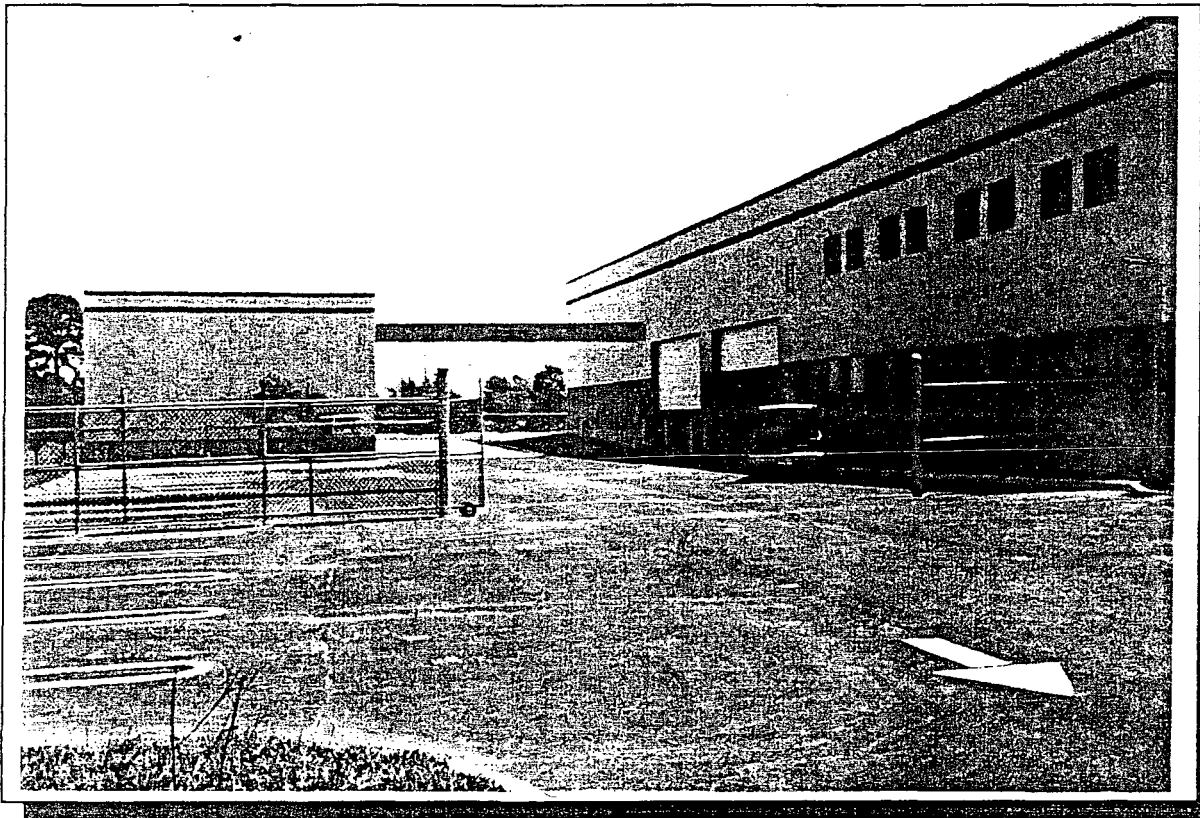
Add Figure II.B.6-1, behind page II.B.6-1.

Discard the following mods from Division IV:

Figure I.B.3-2	March 1993
Attachment I.D.3	March 1993
Attachment II.A.4(b)	March 1993 (pg. 1); June 1993 (pg. 2)
Figure II.A.4(b)-2	June 1993
Attachment II.A.4(d)	March 1993; December 1993 (pg. 4)
Table II.A.4(d)-1	December 1993
Attachment II.A.4(e)	October 1992
Attachment II.A.5	March 1993; June 1993 (pg. 1, 4, 5, 7)
Table II.A.5-1	December 1991
Attachment II.A.6	March 1993
Tables II.A.6-1 through 4	March 1993; June 1993 (Table 4)
Attachment II.B.3	March 1993
Tables II.B.3-1 through 7	Removed in March 1993
Attachment II.B.4	March 1993
Table II.B.4-1	March 1993
Figure II.C.7-1	June 1993
Attachment II.C.9	March 1993
Attachment II.C.12(a)	December 1991; October 1992 (pg. 2)

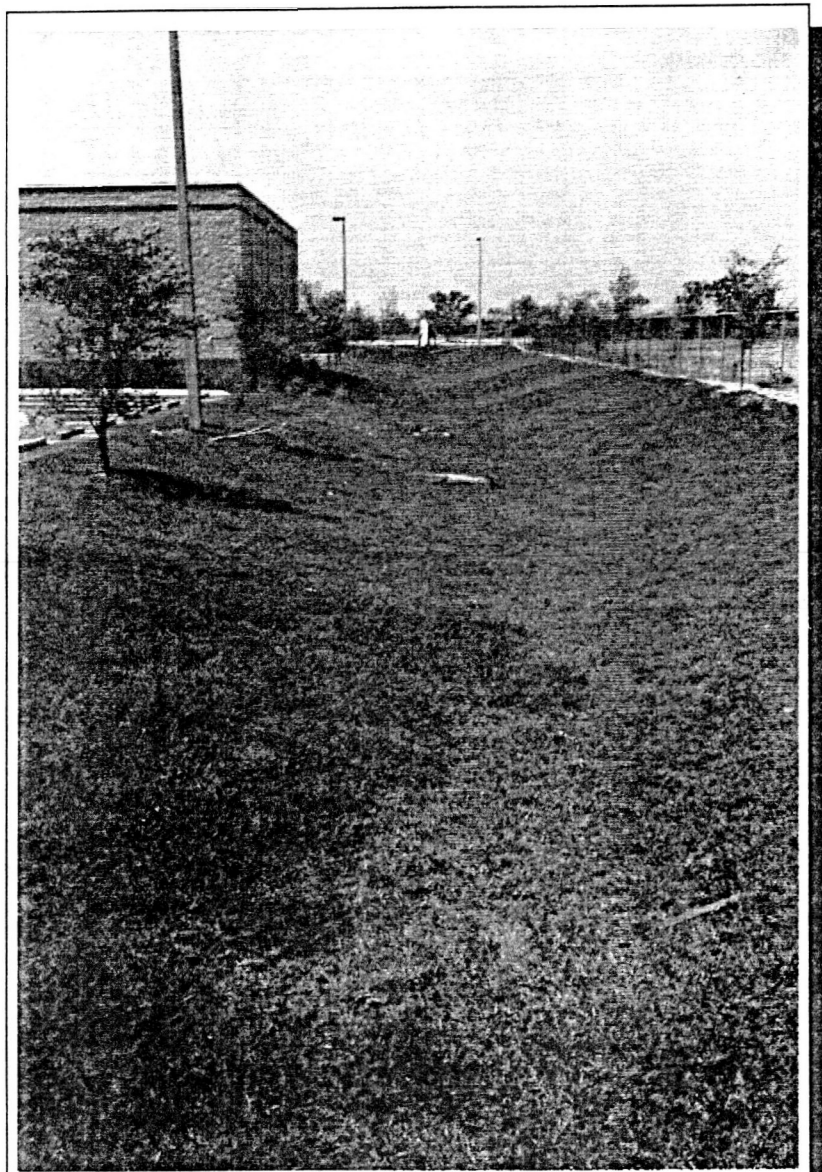


Front entrance to facility (view to the southeast).



North entrance gate looking towards tank storage building (northern building) and return/fill garage door entrances (view to east).

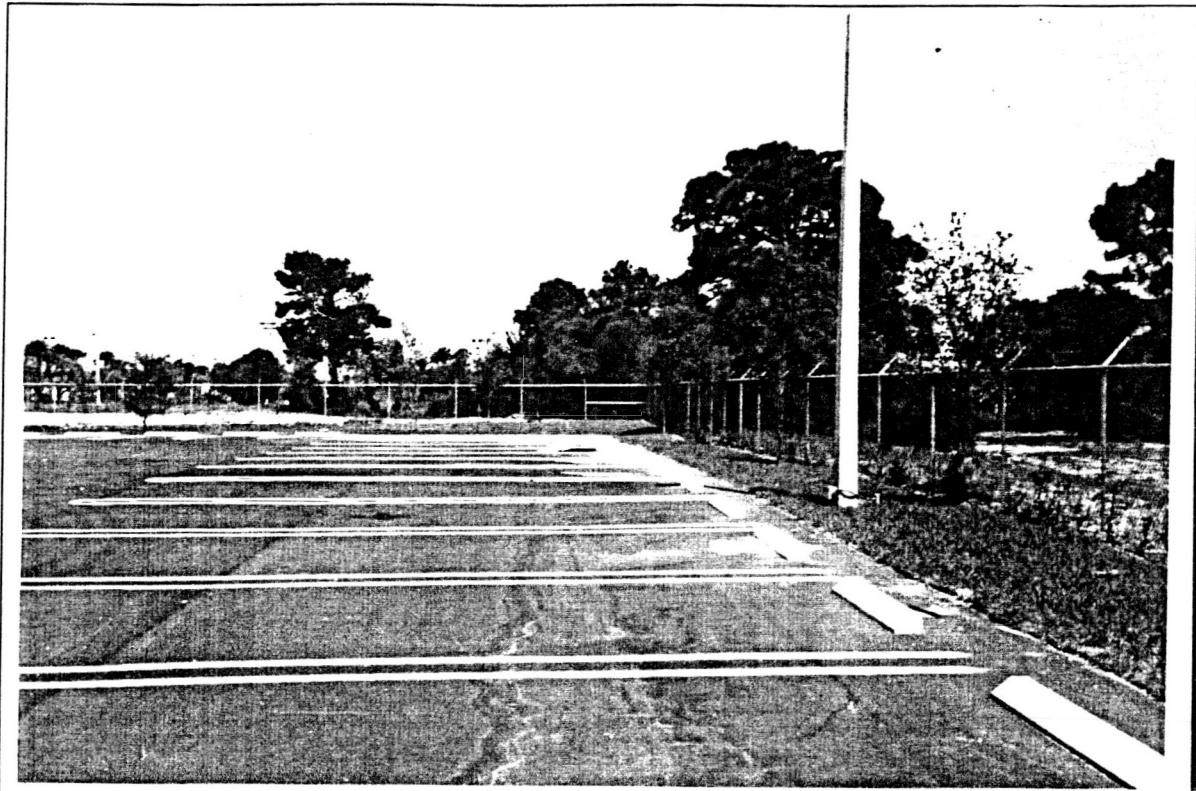
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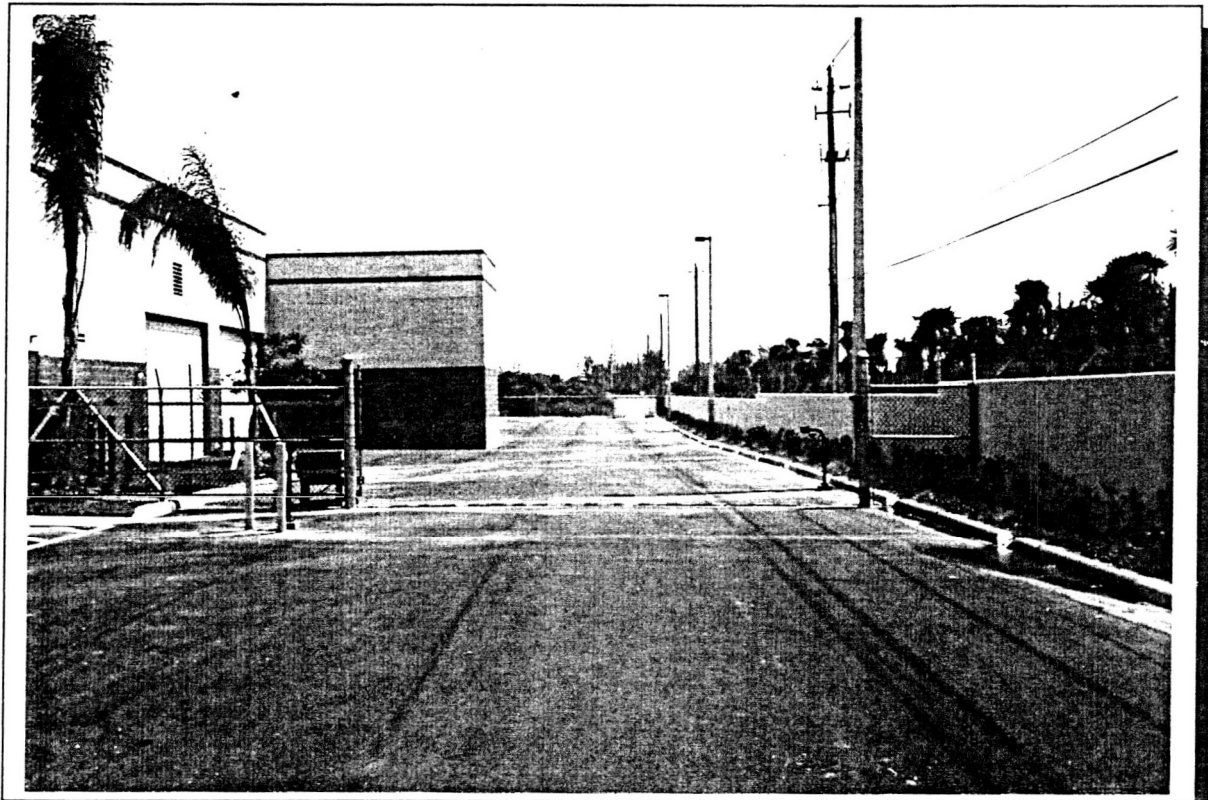
Stormwater retention area to the north of tank storage building
(view to west).



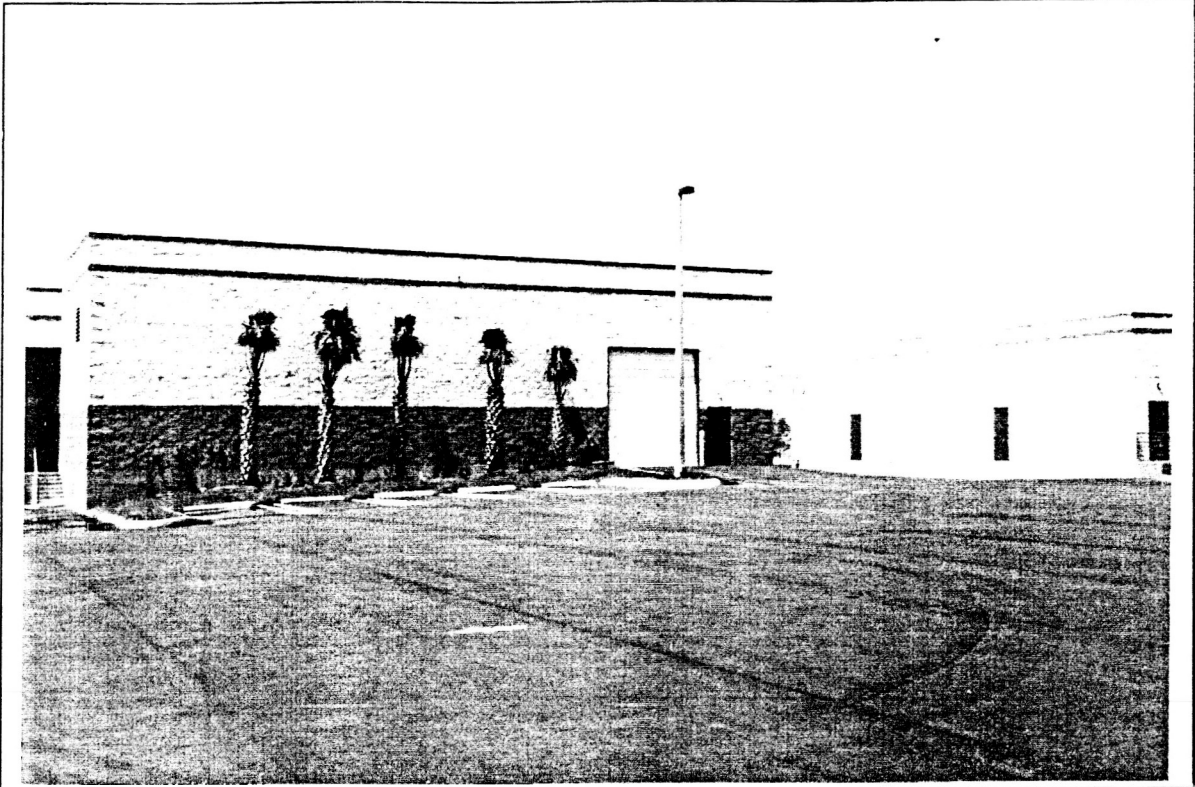
Stormwater detention area south of the property (view to east).



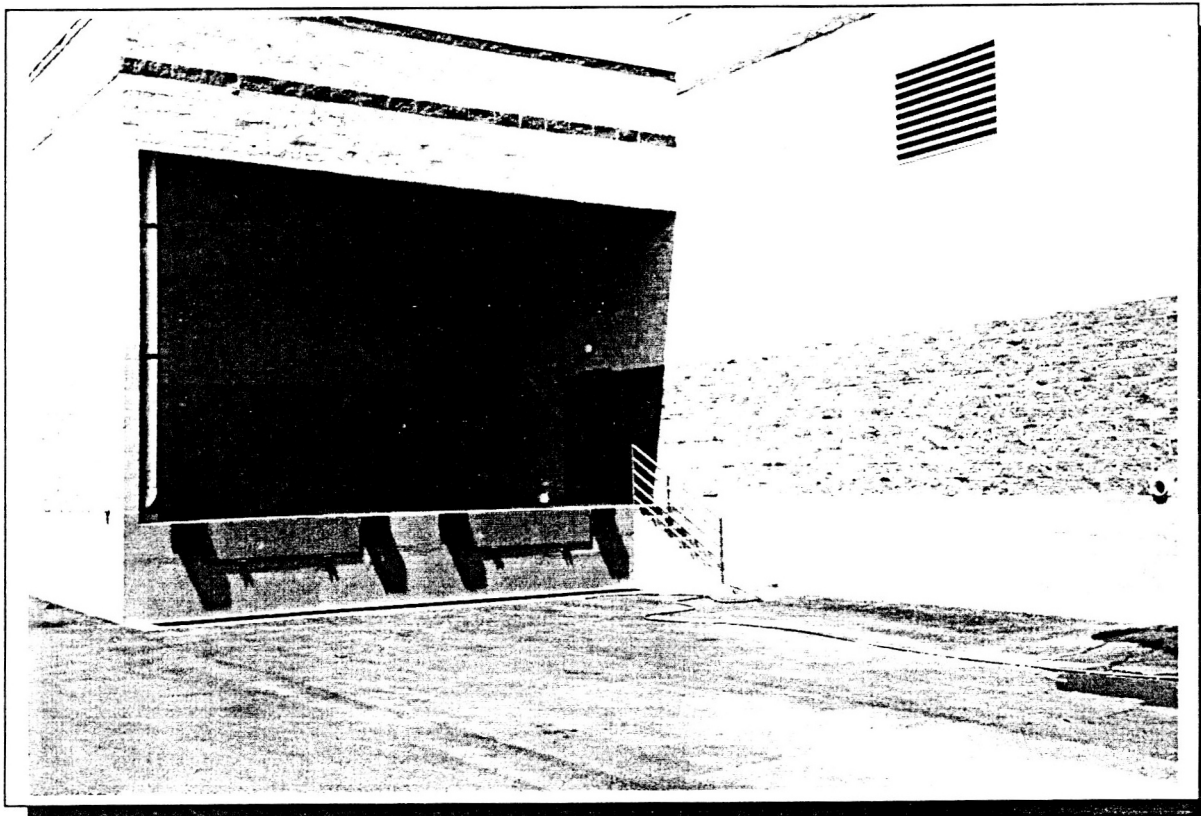
Northeast corner of the property (view to north).



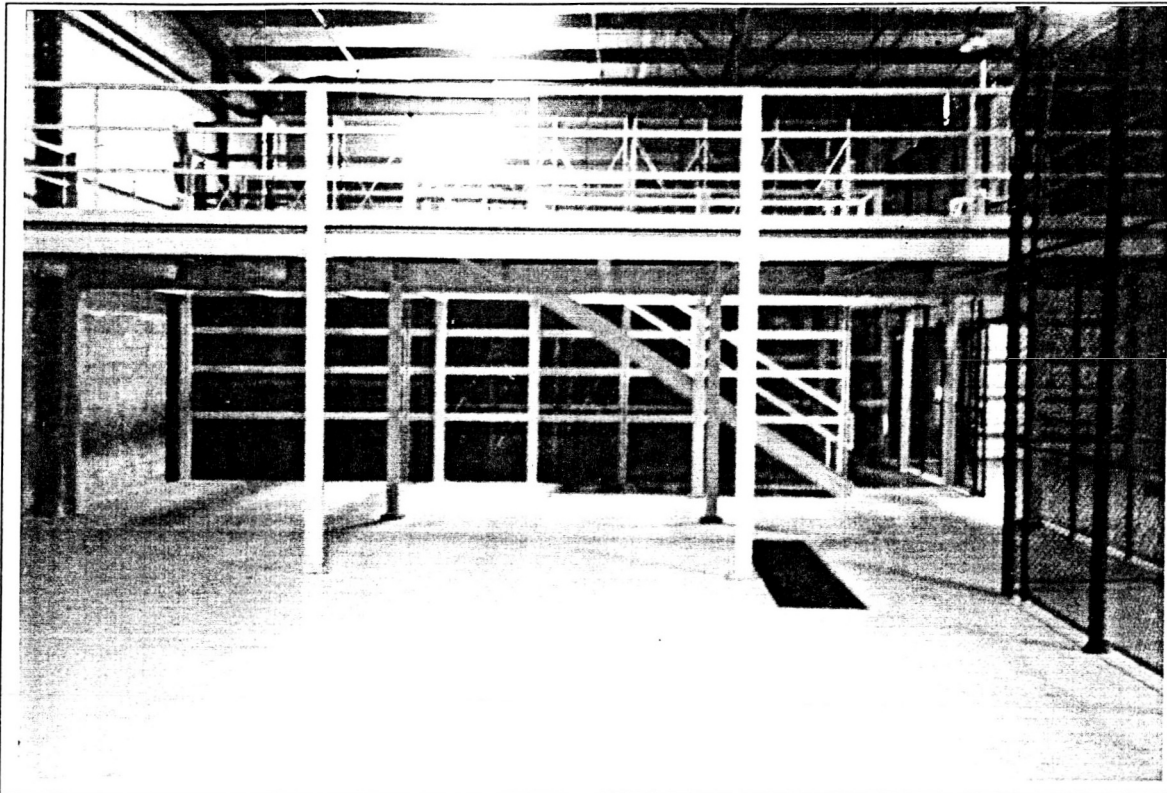
South entrance gate looking towards back of container storage area dock and showing return/fill garage door entrances (view to east).



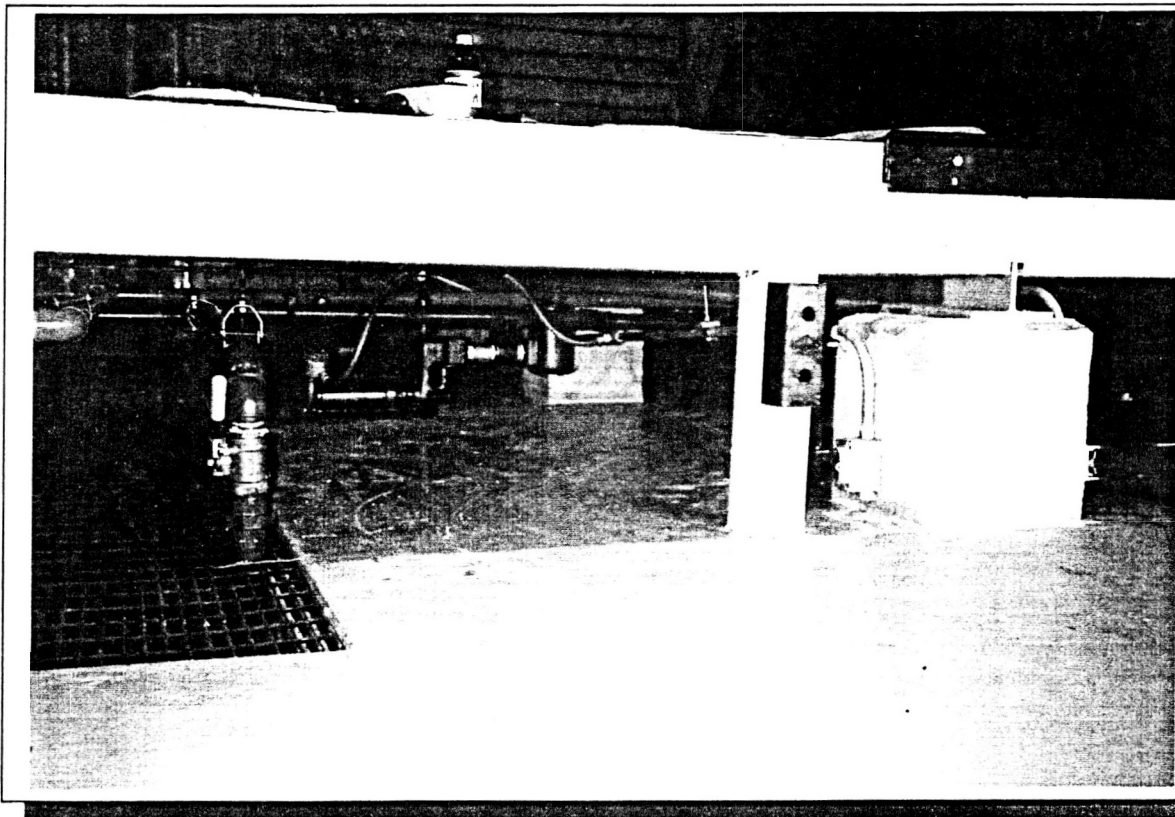
Rear entrance to container storage area (view to west).



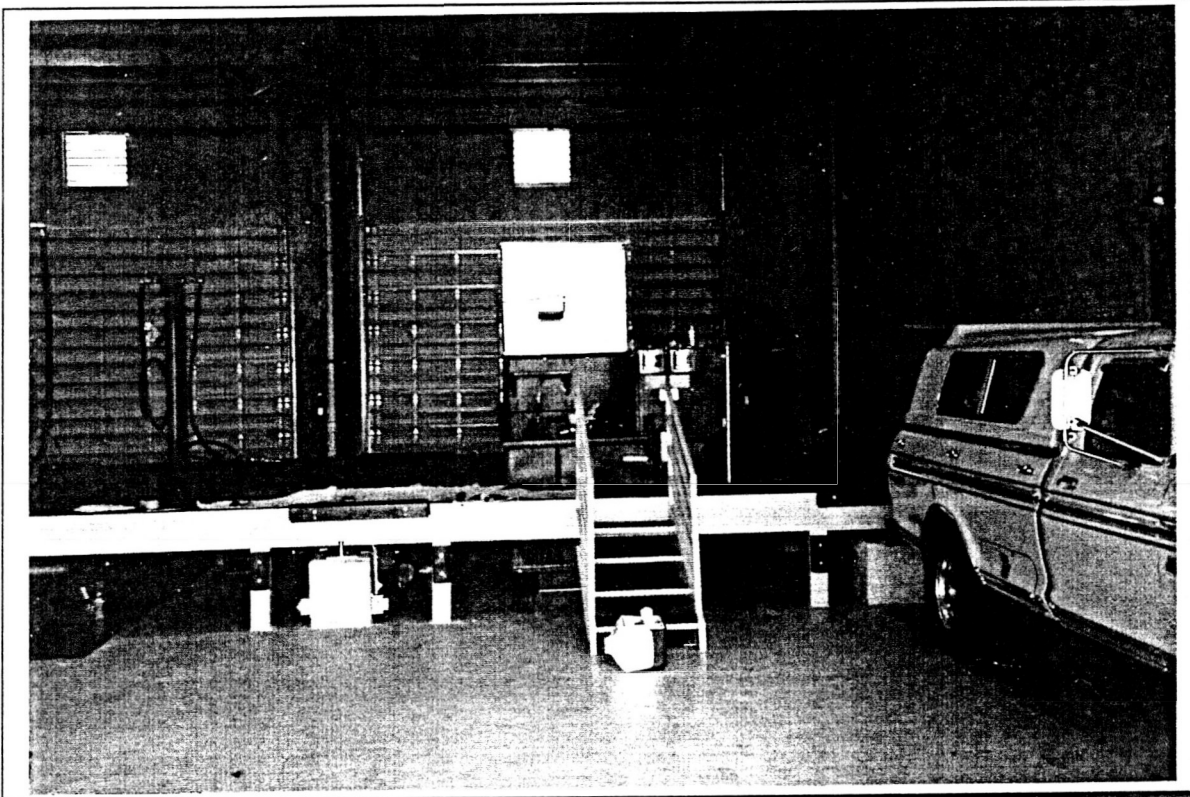
Container storage area dock (view to west).



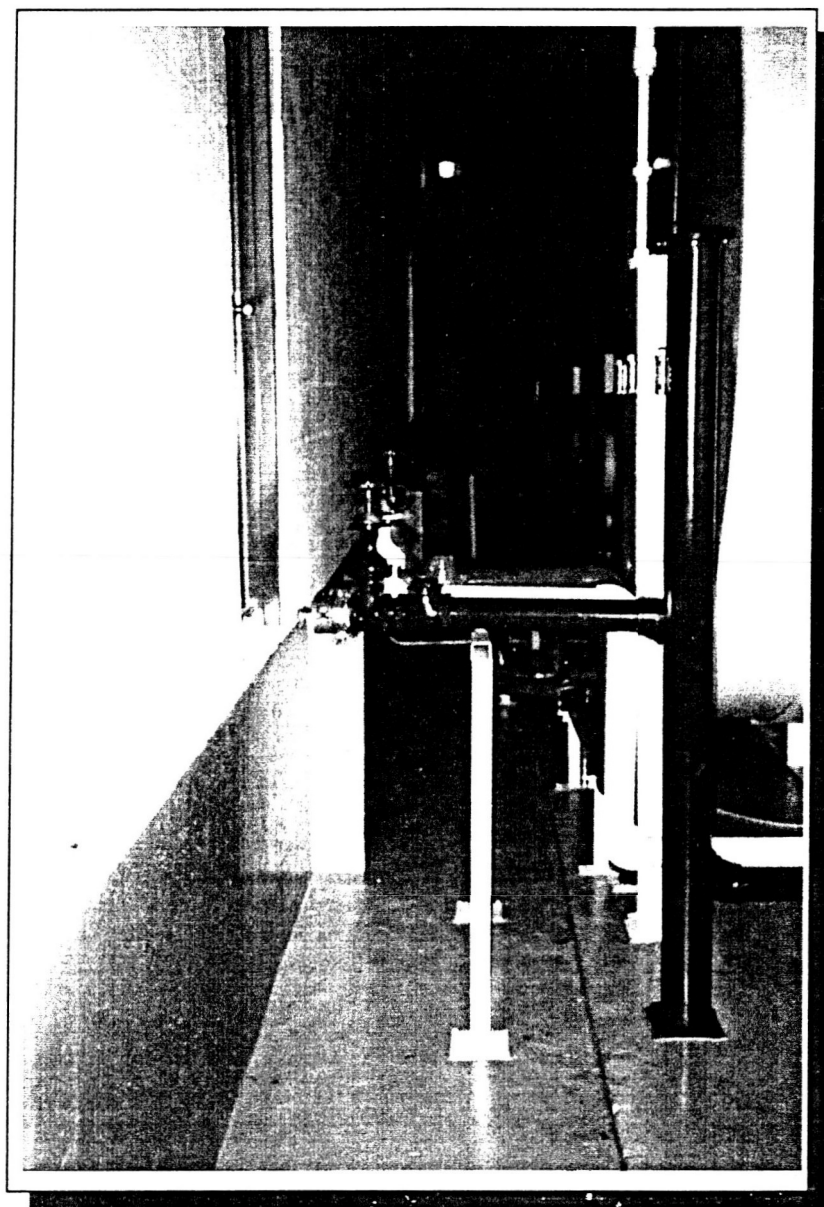
Inside of container storage area (view to south).



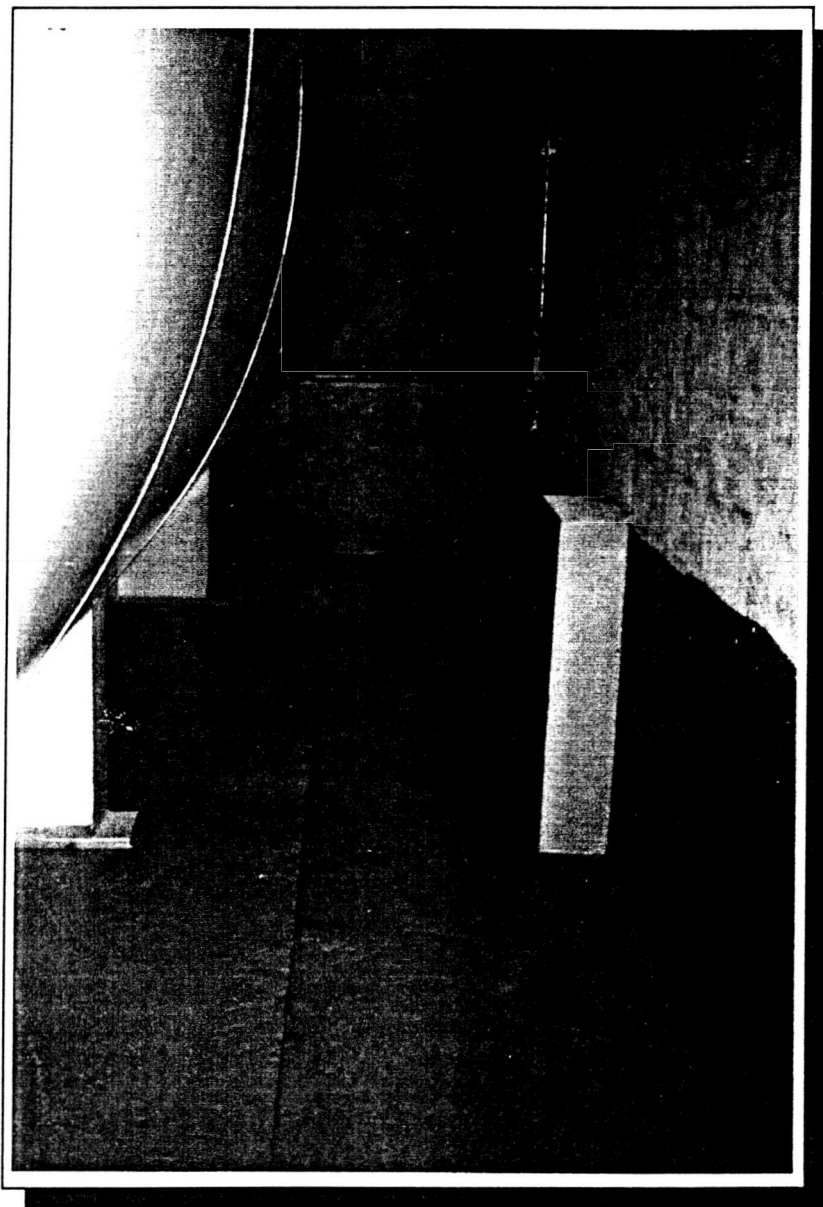
Return/fill shelter and dumpster (view to south).



Return/fill shelter containment trench (view to south).



Inside tank storage building, view showing tanker fill connections
(view to west).



Inside tank storage building, view showing collection trench and sump (view to north).



Revision--11-26-96

EMERGENCY PHONE NUMBERS

Primary: Bernie Korzekwinski
1240 Grandview Circle
Palm Beach, FL 33411
H: 561-791-7053
O: 561-736-1339

Alternate: Greg Hamm
1780-2 Stonehaven Dr.
Boynton Beach, FL 33435
H: 561-734-8203
O: 561-736-1339

Emergency Notification Phone Numbers

Safety-Kleen Environmental Health and Safety Department
1-800-468-1760 (24 Hour)

National Response Center
800-424-8802

Southeast Florida District DEP, 400 N. Congress Ave, West Palm Beach, FL. 33416
561-681-6674 (M-F, 8-5 except Holidays) 904-488-1320 (24 Hour)

South Florida Water Management District: 561-686-8800

Emergency Teams to be Notified

Boynton Beach Fire Dept.
150 E. Boynton Beach Blvd.
Boynton Beach, FL 33435
561-738-7430

O.H. Materials Company
P.O. Box 551
Findlay, OH 45839
800-537-9540
Primary Contractor

Boynton Beach Police
135 N.E. 1st Ave
Boynton Beach, FL 33435
561-732-8132

Ryckman Emergency Action
and Consulting Team (REACT)
P.O. Box 27310
St. Louis, MO 63146
800-325-1398
Secondary contractor

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

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 in Table II.A.4(b)-1.

ACTIONS OF THE EMERGENCY COORDINATOR

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

- a. Activate internal or communication systems to notify all facility personnel. The relatively small size of this Service Center 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 honk 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 he is absent.

Whenever a release, fire, or explosion occurs, the emergency coordinator must immediately identify the character, exact source, amount, and area extent of any released materials.

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/vac, hoses) will be washed with detergent and the wash water and rinsate collected. All non-reusable equipment and/or equipment which is not capable of being decontaminated will be containerized and disposed of as hazardous waste.

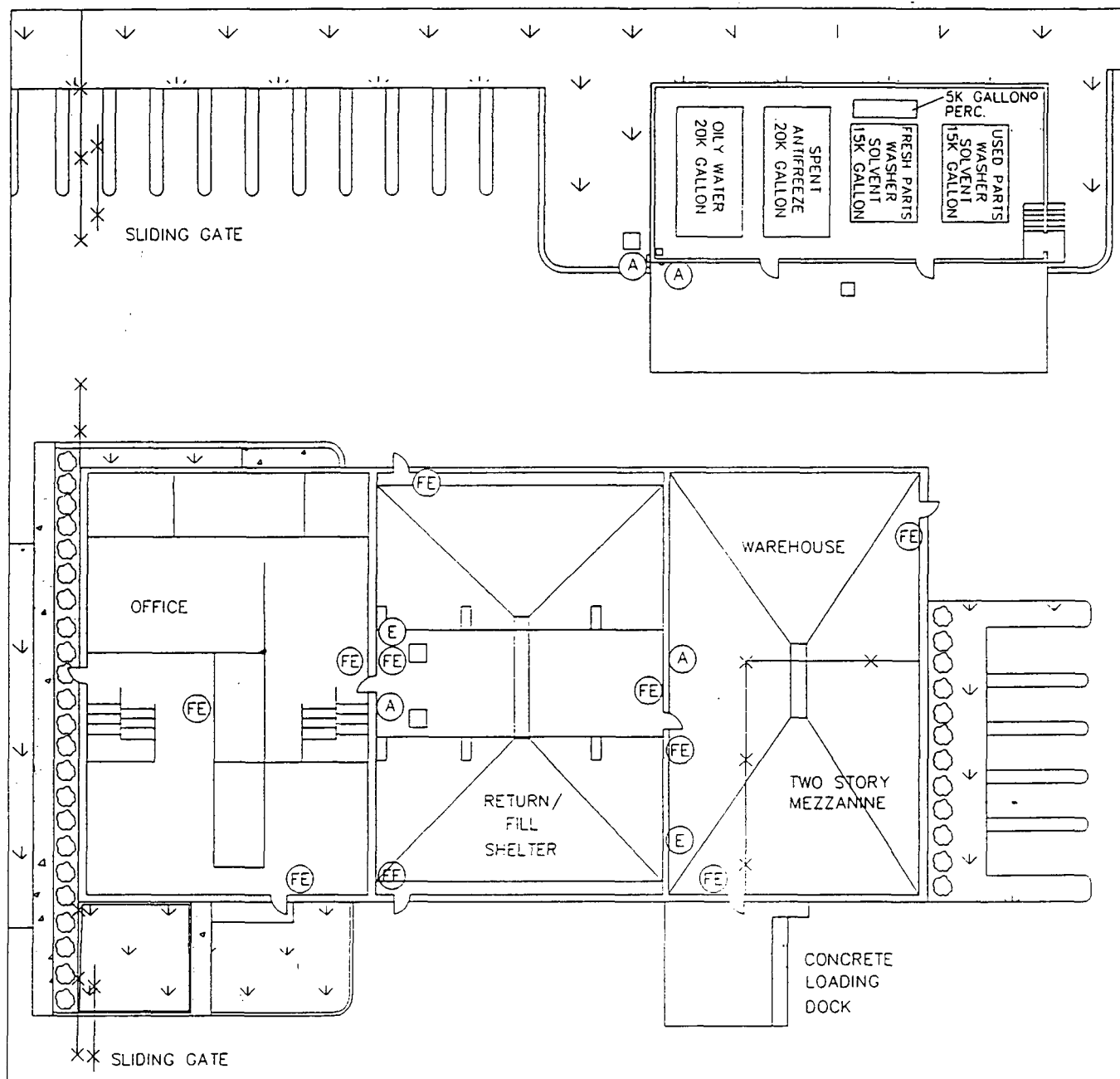
Wash Water and Rinsate

If the rinsate or other wastes generated in the clean-up process are determined to be hazardous, they 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 the waterway or stormwater.

EMERGENCY RESPONSE EQUIPMENT AND COMMUNICATION

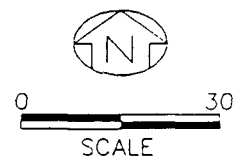
Due to the small size of the facility, routine communication is accomplished by voice communication; however, an intercom is also available. Telephones are used in case of a spill or fire emergency to summon assistance. Emergency numbers are posted by each phone in the office. Included with these phone numbers is the 24-hour spill number which connects to Corporate Environmental Department at the corporate office in Elgin, Illinois. See Figure II.A.4(b)-2 for locations of fire extinguishers, alarms, and the emergency eyewash/shower. Other emergency response equipment is kept in a small storage area inside the warehouse near the return/fill dock. 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. The City of Boynton Beach supplies water for domestic use, decontamination, and fire fighting. Adequate aisle space is provided in the container storage area for movement in an emergency situation.

Figure II.A.4(b)-2
Safety Equipment
Safety-Kleen Corp. Facility
Boynton Beach, Florida



LEGEND

- (FE) FIRE EXTINGUISHER
- (E) EYE WASH/SHOWER
- (A) ALARM



REVISED 03-10-93

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II.A.4(b)-14a

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Corrective Action

Any discrepancies or deficiencies found during the routine inspection must be corrected on a most expedient basis to ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The Branch Manager of the service center has the overall responsibility for resolving any discrepancies found during the routine inspection.

Available Equipment and Communication

Due to the small size of the facility, routine communication is accomplished by voice communication; however, an intercom is also available. Telephones are used in case of a spill or fire emergency to summon assistance. Emergency numbers are posted by each phone in the office. Included with these phone numbers is the 24-hour spill number which connects to Corporate Environmental Department at the corporate office in Elgin, Illinois. Emergency response equipment (Table II.A.4(d)-1) is kept in a small storage area inside the warehouse near the return/fill dock. 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 drum storage area. The City of Boynton Beach supplies water for domestic use, decontamination, and fire fighting. Adequate aisle space is provided in the drum storage area for unobstructed movement of personnel and equipment in an emergency situation.

Pails, hoses, and detergent are the primary equipment which will be utilized for decontamination.

The equipment available at the service center 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 operated in accordance with National Fire Protection Association (NFPA) standards and applicable local ordinances. Applicable health and safety standards also are observed at the service center. A recent air quality survey conducted by an independent industrial hygienist at the Los Angeles service center has shown that air quality at a typical service center is within Threshold Limit Values (TLV) as specified by the Occupational Safety

TABLE II.A.4(d)-1
EMERGENCY RESPONSE EQUIPMENT

Description	Type/Capacity	Location	Quantity
		(Shown in Exhibit I.D.5-2)	
Fire Extinguisher	ABC (10 lb)	Warehouse	3
		Drum Return/Fill Area	4
		Office (1st floor)	3
Eyewash	Fountain	Warehouse	1
		Drum Return/Fill Area	1
First-Aid		Warehouse	1
Telephones	Standard	Office Area	7
Telephones	Standard	Warehouse	1
Gloves	Rubber	Emergency Equip. Area	Min. 3
Intercom	Explosion Proof	All Buildings	N/A
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	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	NA

and Health Administration (OSHA) and local air pollution control criteria, and no respirator or special protection unit is deemed mandatory.

External Factors

The design of the installation 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 and the pump switches are located inside. Also, the drum storage area is in a building which is inaccessible to unauthorized personnel.

- a. Vandalism - Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.
- b. Strikes - A strike would not result in a solvent spill or fire.
- c. Power Failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.
- d. Flooding - The waste management facility elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.
- e. Storms or Cold Weather - The solvent return and fill station is roofed to eliminate the possibility of rain or snow entering the dumpsters. No opportunity is foreseen to affect the facility with snow, cold weather or stormwater.

Containment Systems

Drummed Wastes

All containers are stored in the container (drum) storage area. The current storage area is totally contained by a concrete floor and container area's four walls (Figure II.A.4(d)-1). The containment system is free of cracks.

The floor has a two-inch inward slope (four sides) that would direct a spill toward the collection trench located in the center of the room (Figure II.A.4(d)-1). Only six openings (doorways) in the drum containment area exist. Four of these lead to other containment areas; the drum fill/return and the enclosed concrete dock. The other two openings (doorways) are located on the east side of the drum containment area behind a locked chain link fence. All openings (doorways) are normally closed. Due to the volume of containment available and the configuration of the drum containment area, it is highly unlikely that any spill would extend beyond this area.

In the drum storage area, drums are handled with a hand-truck free of sharp points and stacked by hand. Every time a drum is moved, a chance exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, drums are tightly covered and kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into another safe drum. Each route truck is equipped with an electric hoist. This hoist is used in the loading/unloading operation to minimize chances for spillage and/or employee injury.

Trucks used for shipping containers between the recycle center and service center have lift gates for drum loading/unloading. With the exception of parts washer solvent, all drummed wastes are loaded/unloaded in the vicinity of the enclosed concrete dock the southeast side of the building (Figure II.A.4(d)-1). Because these areas are fully enclosed, spills originating in these areas should not come in contact with stormwater.

All drums are covered during movement and are stored within diked, concrete floored areas to contain any potential spill. The small quantities of waste onsite at any time 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 will be drummed and sent for recycling/reclamation.

All drummed waste movement is done manually or by using a pallet jack and propane-powered fork lift. Therefore, power outages are not expected to threaten employee safety.

Drum Fill/Return Area

The drum fill/return area is located in the service center building between the office and container storage areas. A slight, nondetectable slope (three inches) exists, which terminates at the central collection trench (22' long, 2'1" wide, and 2' deep). A 20-foot wide steel grate dock (approximately 33 inches above the floor) is located perpendicular to the trench and extends the full width of this area (Figure II.A.4(d)-1). Any spill which might occur on the concrete floor would be directed, by gravity, into the collection trench. Any residual remaining on the floor can be cleaned up immediately through the use of mops, wet/dry vacuums, or sorbent materials, should a spill occur. Spilled waste will be drummed and sent for recycling/reclamation. Openings in this area include four overhead doorways for trucks entering/exiting the service building, two doorways for employees entering/exiting the service building, one overhead doorway connecting the drum fill/return area and container storage area, one doorway connecting the drum fill/return area and the container storage area, and one doorway connecting the drum fill/return area and the offices. The office floor/doorway and the container storage area floor/doorway are approximately 33 inches above the drum fill/return area floor, flush with the steel grate dock. Therefore, spills originating in the drum fill/return area cannot continue into these areas. Based on the capacity of the drum fill/return collection trench and sloped floor, it is extremely unlikely that a spill would exit through the overhead doorways or two doorways entering/exiting the service building. The area just outside the service building drum fill/return area is asphalt covered. Because the drum fill/return area is fully enclosed and the pavement outside this area is sloped to carry water away from the building, spills originating in this area should not come in contact with stormwater.

Tank Area

The aboveground tanks for this facility are fully enclosed inside a separate building (Figure II.A.4(d)-1). The building's foundation and sides, from grade to three feet, are constructed of monolithically poured concrete and coated with a concrete sealer that is compatible with and resistant to chemicals stored in this area. From three feet to the roof, concrete block was used. Two doorways located on the south side

of the building, placed three feet above grade, are used for connecting the tanker trucks to the aboveground tanks. An entrance/exit door, placed three feet above grade, is located on the east side of the building. Within the building a three-foot wide trench extends the full length of the west and north sides. Any minor spills occurring in the building sloped floor are directed by gravity into these trenches and subsequently into the sumps located on the northeast or southwest corners. Other spills are contained within the building.

A rectangular concrete pad, extending the full length of the building and 20 feet wide, is located outside the building on its south side. This concrete is utilized to provide containment during the transfer of product between the aboveground tanks and a tanker truck. All side of this pad are sloped inward and terminate at a 2.5' by 2.5' square sump. Spills which occur during the transfer of product are directed by gravity into the sump. Residual product remaining on the concrete surface are immediately cleaned up through the use of mops, wet/dry vacuums, or sorbent materials, should a spill occur.

Product contained in any containment trench (container storage area, drum fill/return area, and aboveground tank building area) is immediately pumped into a drum using a hand-held electric pump, and sent for recycling/reclamation.

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, will eliminate or greatly minimize the chance of contamination of ground water, soils, 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 areas.

Ignitable Wastes

All wastes and products are kept away from ignitable sources--Personnel must confine smoking and open flames to remote areas, separate from any solvent. Smoking is allowed only in the front ventilated area and outside the front door. 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.

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 solvent and paint wastes are stored in a tank or in drums, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the drums kept at room temperature to minimize the potential for pressure build up.
2. Produce uncontrolled toxic mists, fumes, dusts, or gases in quantities sufficient to threaten human health--The vapor pressure of parts washer solvent is low (2 mm) and it and the paint waste are reactive with strong oxidizers and reactive metals only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization will be minimal under normal working conditions.
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 will not cause deterioration of the tank, drums, or other structural components of the facility.

Incompatible Wastes

Reactive and/or incompatible waste is not handled at the facility. All waste or products are kept away from ignition sources. Employees must confine smoking to the designated safe area.

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.

RESPONSIBILITY FOR PREPAREDNESS AND PREVENTION PLAN

The preparedness and prevention plan, as well as the training of employees for its implementation, is the responsibility of the Branch Manager with assistance from corporate staff. The detailed training program is described in the Personnel Training Plan (Attachment II.A.4(e)).

ATTACHMENT II.A.4(e)
PERSONNEL TRAINING

This section of the permit application describes Safety-Kleen's corporate training program. Training plan outlines, job descriptions, training content, frequency and techniques are described as well as the implementation of the training program. All positions described herein may not be present at all facilities.

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

DESCRIPTION OF TRAINING PROGRAM

Each employee is trained to operate and maintain the service center safely, and to understand hazards unique to his job assignment. New Branch Managers (Resource Recovery Branch Manager) must complete a formal introductory training program before starting their jobs, with annual review and update thereafter. New Sales Representatives must be trained prior to unsupervised customer visits. All other hazardous waste employees must undergo a combination of videotape and on-the-job training within six months of starting.

OUTLINE OF TRAINING PROGRAM

An outline of the training program, given both initially and annually to employees who manage or handle hazardous waste at the Service Center is presented in Table II.A.4(e)-1.

JOB TITLE/JOB DESCRIPTION

Job descriptions for employees who would be expected to manage or handle hazardous wastes, including the Branch Manager (Resource Recovery Branch Manager), Branch Automotive Manager, Branch Industrial Manager, Branch Secretary (paperwork only), Sales Representatives, Warehouse Personnel, and Special Markets Manager are provided in Tables II.A.4(e)-2 through II.A.4(e)-9.

TRAINING CONTENT, FREQUENCY, AND TECHNIQUES

Employee training is accomplished using classroom, videotape, written, and on-the-job methods. The Environment Health and Safety (EHS) Department of Safety-Kleen's Corporate Office prepares a training program for employees and they must provide documentation that the program has been executed. An employee is trained prior to starting or as soon as he or she begins working, (depending on his or her position), and is trained annually thereafter.

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

Training of New Branch Managers: New Branch Managers are trained for four weeks before they begin their new positions. This training is given both on the job and in the classroom. During this training, the new manager reviews all environmental records and learns the recordkeeping requirements. These records include: manifests, personnel records, training records, service center inspection records, and spill reports. At least eight hours of this initial training consists of an introduction to environmental law and a review of the Part B, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan.

The training culminates in at least three weeks of training at his new service center, at least one day of which is devoted to environmental training with the Environmental Health and Safety Manager. Additional time is spent reviewing past environmental compliance at the Branch Manager's service center, the regulations unique to his state are discussed as well.

Branch Automotive Managers, Branch Industrial Managers, and Special Markets Managers receive training specified in Table II.A.4(e)-1.

Training of New Branch Secretaries: Branch secretaries are trained in the proper recordkeeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then

process or file it as required. Additional training is overseen by the Branch Manager and is done within six months of starting. This training is often presented in company-produced videotape presentations on emergency response, shipping documents (including manifests), drum labels, and other safety and environmental compliance issues. In addition, the Preparedness, Prevention, Contingency, and Emergency Procedures Plan and Waste Analysis Plan must be reviewed with the Branch Manager within the first two weeks of the Secretary starting work.

Training of New Sales Representatives: New Sales Representatives are trained on the job for two weeks during which they are introduced to manifests, service center inspection records, and training records. A Sales Representative may also be trained as the designee for performing the service center inspection. Additional training is in the form of videotape presentations and a review of the Preparedness, Prevention, Contingency, Emergency Procedures Plan. The Preparedness, Prevention, Contingency, and Emergency Procedures Plan and Waste Analysis Plan must be reviewed with the Branch Manager before the Sales Representative formally begins his new position and annually thereafter.

Training of New Warehousemen: A warehouseman is trained to maintain the service center and assist the other branch employees in their tasks. He may be a designee for the service center inspection and must be trained by the Branch Manager as such. Within two weeks of the warehouseman's starting, the Branch Manager must review the Preparedness, Prevention, Contingency, and Emergency Procedures Plan and Waste Analysis Plan with him, and within six months he must review the items listed in the outline presented in Table II.A.4(e)-1.

Annual Training: On an annual basis, employees are trained using a program prepared and updated annually the EHS Department which contains the topics in Table II.A.4(e)-1. This training also includes updates on environmental regulations, an in-depth review of the Preparedness, Prevention, Contingency, and Emergency Procedures Plan and a review of RCRA inspection criteria. This review is in the form of videotapes and a review and discussion of the storage service center permit/application. In addition, periodic memoranda on changes in environmental regulations are issued by the EHS Department and must be read and discussed by all branch personnel.

TRAINING DIRECTOR

The training is directed by Safety-Kleen's Training and Development, and Environment Health and Safety (EHS) Departments which operate out of the Corporate Office in Elgin, Illinois. Each Environmental Health and Safety Manager who works in this department is responsible for compliance of the service centers in a given geographic area of the country. The cooperative effort of both departments must:

- n Provide a training program which addresses the requirements of environmental regulations and corporate policy;
- n Notify the proper authorities, oversee remedial actions, and submit a written report to the state after an emergency situation has occurred;
- n Manage any environmental compliance issues which exceed the resources available at the service center level; and
- n Participate in training new Branch Managers.

Qualifications for individuals that are members of the EHS Department and may conduct training at the Service Center are available upon request.

RELEVANCE OF TRAINING TO JOB POSITION

Each employee is trained to operate and maintain the service center safely and to understand hazards unique to the job assignment. Safety-Kleen's training programs are designed to give employees appropriate instruction regarding the hazardous waste management procedures they will encounter in performing their respective duties. Since the handling of hazardous materials is a large part of the operations of the service center, all employees are given training in environmental

regulations, transportation regulations, the Preparedness, Prevention, Contingency, and Emergency Procedures Plan.

TRAINING FOR HAZARDOUS WASTE MANAGEMENT

As described previously, all employees are trained in the aspects of hazardous waste management which are relevant to their position. This includes job-specific hazards and necessary precautions, emergency response, and proper recordkeeping. This training is given initially and updated annually.

TRAINING FOR PREPAREDNESS, PREVENTION, CONTINGENCY, AND EMERGENCY PROCEDURES PLAN IMPLEMENTATION

All employees are trained in Preparedness, Prevention, Contingency, and Emergency Procedures Plan implementation, through both initial training and yearly refresher courses, as summarized in Table II.A.4(e)-1. Employees are trained on the contents of the Preparedness, Prevention, Contingency, and Emergency Procedures Plan as well as criteria for implementation.

TRAINING FOR EMERGENCY RESPONSE

All employees are trained in emergency response procedures, through both initial training and yearly refresher courses, as summarized in Table II.A.4(e)-1. The emergency training involves spill and fire prevention as well as remedial action procedures. Employees are also trained to recognize when evacuation and outside assistance may be necessary.

IMPLEMENTATION OF TRAINING PROGRAM

New Branch Managers, and Sales Representatives must complete an introductory training program discussed previously before starting their jobs, with annual review and update thereafter. Branch Secretaries and Warehousemen are given instruction on the Preparedness, Prevention, Contingency, and Emergency Procedures Plan within two weeks of starting work, and are given the full hazardous waste training course, as outlined in Table II.A.4(e)-1, within six months of starting

work. Warehousemen involved in direct handling of hazardous waste do not work unsupervised until they have completed the entire initial hazardous waste training course.

PERSONNEL TRAINING RECORD FORMS

Table II.A.4(e)-10 is a sample personnel training record form. This form, or one similar to it, will be used to record training. All training is documented and kept on file at the service center until closure. Additional forms may be used contingent upon the specific issue being addressed. All forms will show the training received, employee name, the date of training, and the signatures of the trainer and trainee.

TABLE II.A.4(e)-1

**INTRODUCTORY AND CONTINUING TRAINING TOPICS
FOR SERVICE CENTER EMPLOYEES**

- Hazard Communication Safety Training
- Hazard Communication Understanding MSDSs
- Preventing Injuries and Illnesses
- Chemistry of Safety-Kleen Products
- Hazardous Materials Regulations
- Waste Analysis Plan
- Preparedness, Prevention and Contingency Plans
- Day Four - Ten Day Training - Haz Mat/POT/MANFST VID QUIZ
- Completion of New Employee Orientation Program *
- Initial Contingency Plan Training (Including Part B review) *
- Respirator Fit Testing and Training

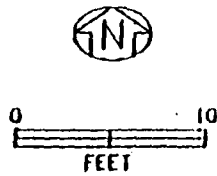
* New employees only. Not a part of annual training.

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

REVISED 06-18-83

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II.C.2-1A



HIGH LEVEL
ALARM SYSTEM

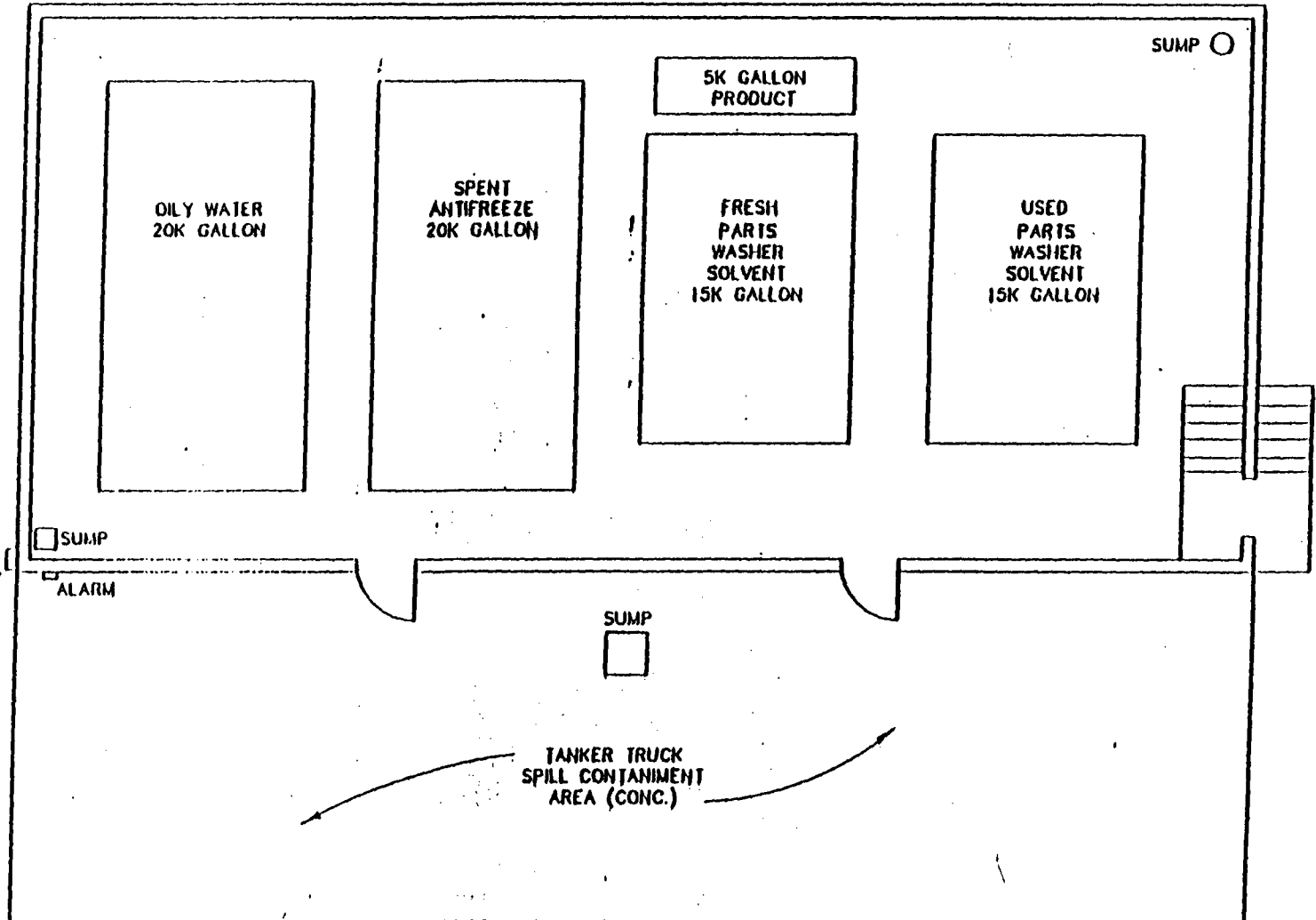


FIGURE II.C.11-1**INSPECTION LOG SHEET FOR
DAILY INSPECTION OF GATES AND LOCKS**

Check all gates and locks for security, sticking, corrosion, lack of warning signs, or uncommon activity.

Name	Date	Time	Status

**SAFETY-KLEEN CORP.
RCRA PART B PERMIT
HO 50-287405
CURRENTLY VALID MODIFICATIONS**

Attachment I.B.3	March 1993	Facility Layout
Attachment I.D.2	June 1993	Facility Operation
Attachment I.D.3	June 1993 (page 1)	Waste Codes
Attachment II.A.1(c)	March 1993 (page 1)	Traffic
Figure II.A.1(c)-1	March 1993	Traffic
Attachment II.A.7	March 1993	Manifest
Attachment II.B.1	March 1993	Containment
Attachment II.B.6	March 1993	Closure
Attachment II.C.1	December 1991	Tank Assessment
Attachment II.C.2	June 1993	Tank System
Attachment II.C.7	December 1991	Tank System
Figure II.C.7-3	December 1993	Return Shelter
Attachment II.K.1	March 1993	Closure Plan

Figure B.6-1
Typical Closure Schedule

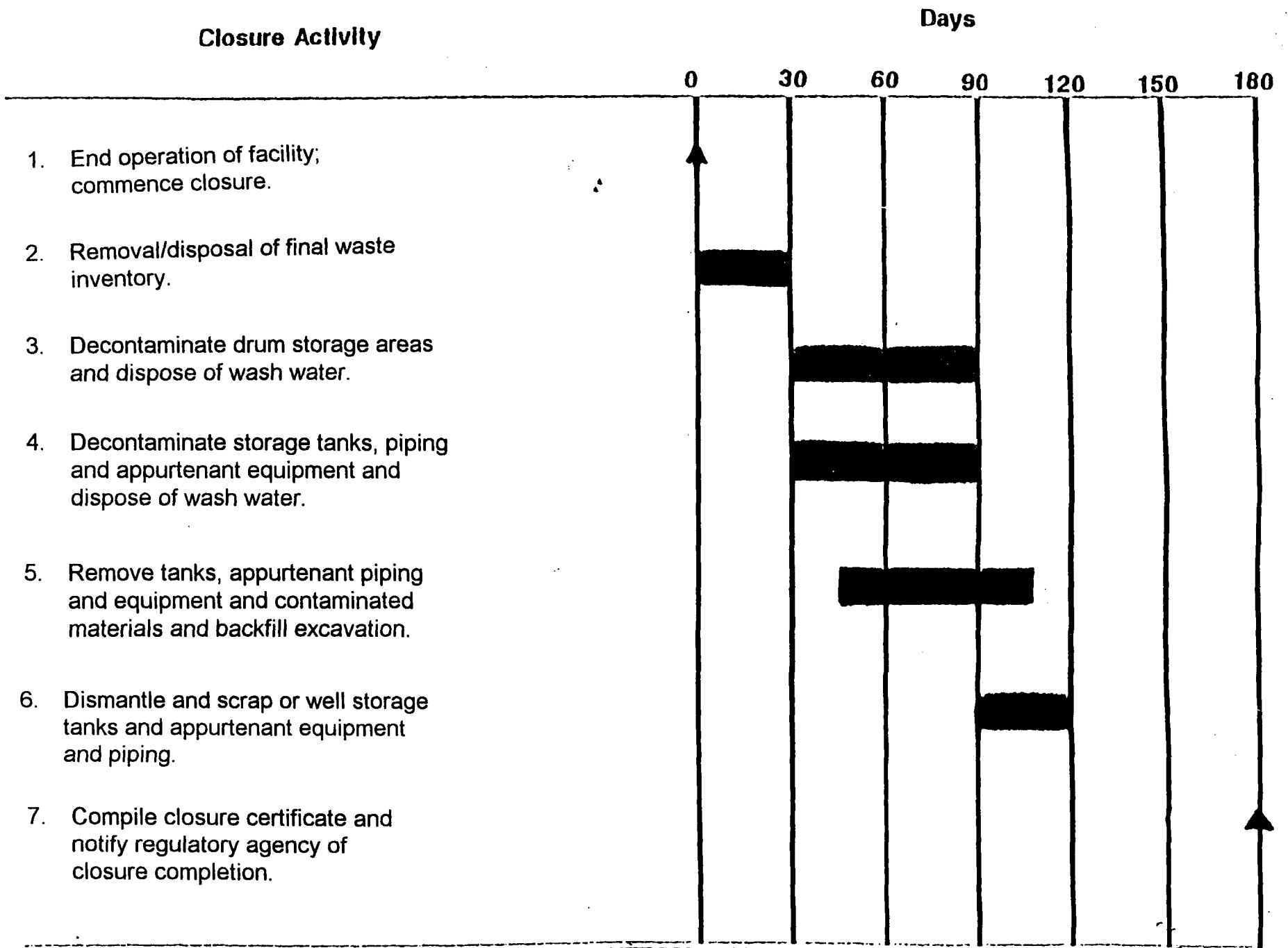


Figure I.B.3-1
Site Layout Map
Safety-Kleen Corp. Facility
Boynton Beach, Florida

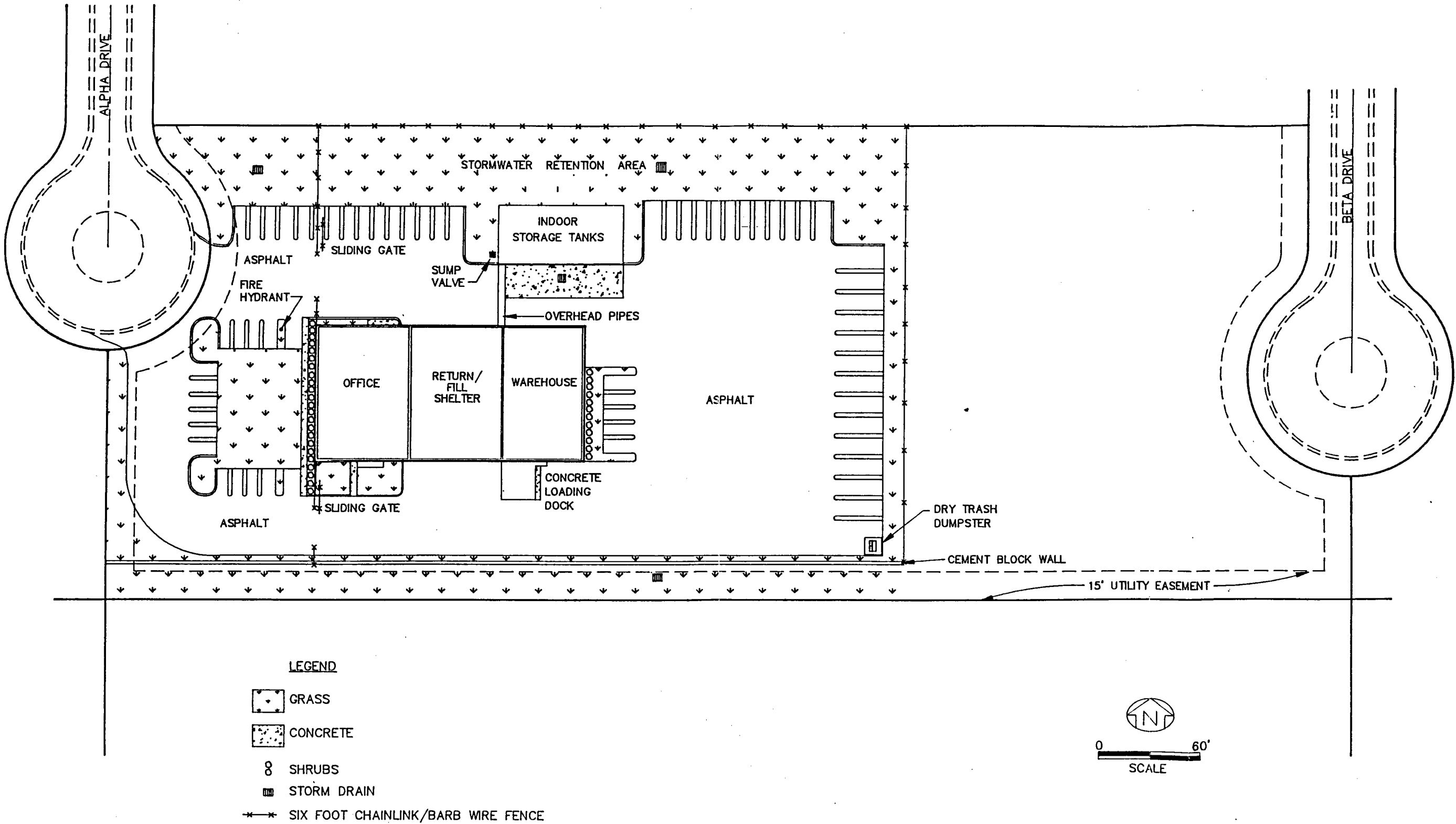
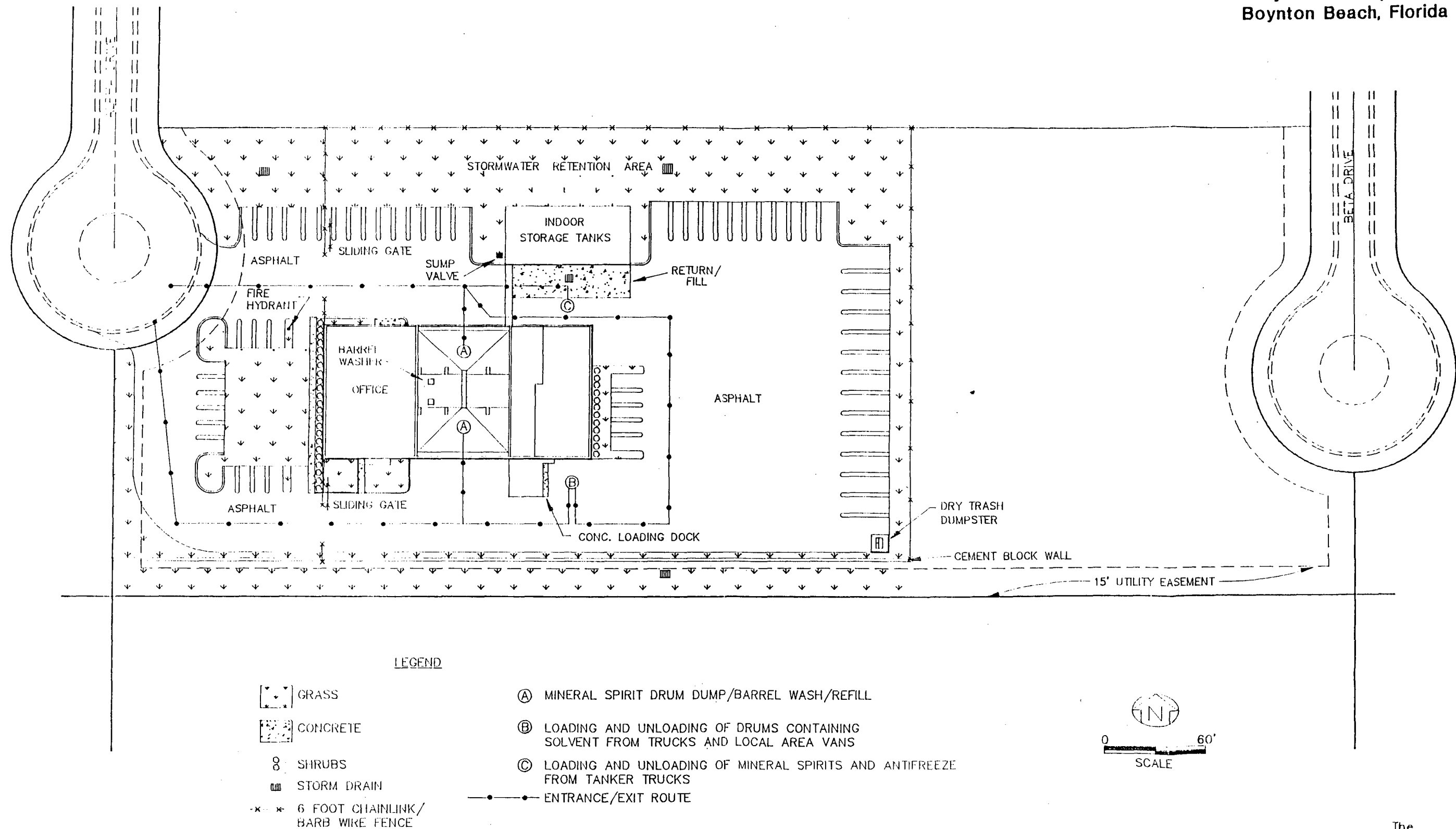


Figure I.B.3-2
Truck Traffic Patterns and Loading/
Unloading Areas of Hazardous Waste
Safety-Kleen Corp. Facility
Boynton Beach, Florida



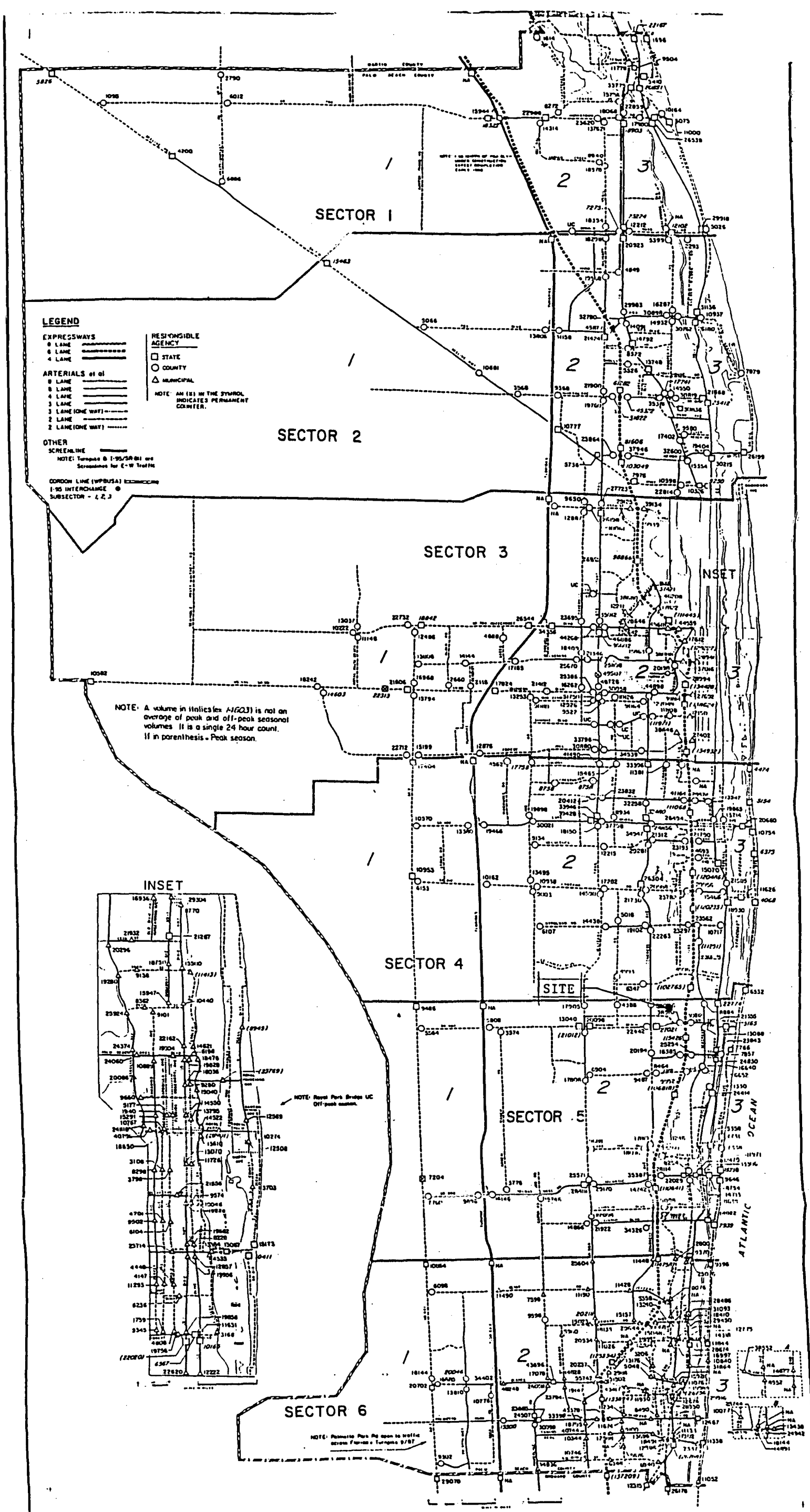


Figure I.B.3-3
Traffic Volumes
Safety-Kleen Corp. Facility
Boynton Beach, Florida

