

AUG 3 1983

4AW-RM

Mr. Sidney A. Lewis
International Solvent Recovery, Inc.
670 Crosswinds Drive, North Suite D
St. Petersburg, Florida 33710

RECEIVED
SEP 26 1983
Hazardous Waste

Re: International Solvent Recovery, Inc. (ISR)
EPA I. D. Number FLD 980 729 610

Dear Mr. Lewis:

Enclosed is the hazardous waste storage permit for I.S.R., located in Bartow, Florida. The permit became effective on _____ and will be in effect for ten (10) years from the date of issuance. Provisions for appealing any condition of the permit decision are contained in 40 CFR Part 124.19.

A copy of 40 CFR Part 264 amended through the date of permit issuance is also enclosed. These regulations must be followed in complying with the requirements of the above mentioned permit.

If there are any questions, please contact James H. Scarbrough of my staff at 404/881-3016.

Sincerely yours,

15/
Thomas W. Devine
Director
Air and Waste Management Division

cc: Craig Diltz
Florida Department of Environmental Regulation

CBell/scf/2433/8-1-83

(20A - 3)

15/1/83

International Solvent Recovery, Inc.
Bartow Airport Industrial Park
Route #3 Post Office Box 235
Bartow, Florida 33830



Bartow Municipal Airport Development
Authority
P.O. Box 650
Bartow, Florida 33830

I.D. Number FLD980729610
Permit Number FLD980729610

Permit

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to International Solvent Recovery, Inc., and the Bartow Municipal Airport Development Authority (hereafter called the Permittees), as the operator and owner, respectively, to operate a hazardous waste storage facility located in Bartow, Florida, at Bartow Municipal Airport, at latitude N 25°57'15" and longitude W 81°46'50". These parties are jointly and severally liable and responsible for compliance with the terms and conditions of this permit.

The Permittees must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated November 30, 1982, as modified by subsequent amendments dated December 14, 1982, December 17, 1982, January 17, 1983, March 18, 1983, May 6, 1983, and May 24, 1983, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittees must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of August 3, 1983, in accordance with §270.41, and shall remain in effect until August 3, 1993, in accordance with §270.50, unless revoked and reissued, or terminated (40 CFR §§270.41 and .43) or continued in accordance with §270.51(a).

8/3/83
Date Signed

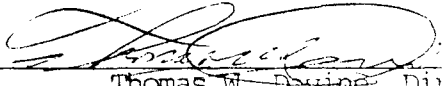

Thomas W. Devine, Director
Air and Waste Management Division

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SECTION I - STANDARD CONDITIONS

I.A. EFFECT OF PERMIT

The Permittees are allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Sections 104, 106(a) and 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment.

I.B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR §§270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittees does not stay the applicability or enforceability of any permit condition.

I.C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

I.D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittees shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.
2. Duty to Reapply. If the Permittees wish to continue an activity allowed by this permit after the expiration date of

this permit, the Permittees shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittees have submitted a timely, complete application (see 40 CFR §§270.13-270.29 Tanks and Storage) and through no fault of the Permittees the Regional Administrator has not issued a new permit as set forth in 40 CFR §270.51.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittees in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. The Permittees shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
6. Proper Operation and Maintenance. The Permittees shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittees to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
7. Duty to Provide Information. The Permittees shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and re-issuing, or terminating this permit, or to determine compliance with this permit. The Permittees shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
8. Inspection and Entry. The Permittees shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter at reasonable times upon the Permittees' premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 or an equivalent method as specified in the attached Waste Analysis Plan, Appendix A of the application.
- (b) The Permittees shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (c) Records of monitoring information shall specify:
 - (i) The dates, exact place, and times of sampling or measurements;
 - (ii) The individuals who performed the sampling or measurements;
 - (iii) The dates analyses were performed;
 - (iv) The individuals who performed the analyses;
 - (v) The analytical techniques or methods used; and
 - (vi) The results of such analyses.

10. Reporting Planned Changes. The Permittees shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification. The Permittees may not commence storage of hazardous waste at the facility until:
- (a) The Permittees have submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittees and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - (b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
 - (ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittees of his or her intent to inspect.
12. Anticipated Noncompliance. The Permittees shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR §§270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittees shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.
14. Twenty-four Hour Reporting. The Permittees shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittees become aware of the circumstances. This report shall include the following:
- (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
 - (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (i) Name, address, and telephone number of the owner or operator;
 - (ii) Name, address, and telephone number of the facility;

- (iii) Date, time, and type of incident;
- (iv) Name and quantity of materials involved;
- (v) The extent of injuries, if any;
- (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
- (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written statement shall also be provided within 15 days of the time the Permittees become aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

15. Other Noncompliance. The Permittees shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition D.14.

16. Other Information. Whenever the Permittees become aware that they have failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittees shall promptly submit such facts or information.

I.E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR §270.11.

I.F. Confidential Information. The Permittees may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12.

I.G. Documents To Be Submitted Prior to Operation. The Permittees may not commence storage of hazardous waste at the facility until the following information has been submitted to and approved by the Regional Administrator;

- 1. An updated contingency plan to include the following items and information:
 - (a) the designation of permanent emergency coordinators;

- (b) the names, titles, addresses and phone numbers of the emergency coordinators;
 - (c) the verification of the distribution of copies of the amended contingency plan to all appropriate agencies including police and fire departments, area hospitals, and state and local emergency response teams; and
 - (d) a statement authorizing the designated emergency coordinators to commit the necessary resources to implement the contingency plan.
- 2. The required documentation demonstrating financial assurance for facility closure at least 60 days prior to planned commencement of operations.
 - 3. The required documentation demonstrating liability coverage for sudden and accidental occurrences at least 60 days prior to planned commencement of operations.
 - 4. Prior to installation, the applicants shall submit a demonstration indicating that the epoxy sealant for seams in the containment area is compatible with the hazardous wastes.

I.H. Documents To Be Maintained at Facility Site. The Permittees shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

- 1. Waste analysis plan as required by 40 CFR §264.13 and this permit.
- 2. Personnel training documents and records as required by 40 CFR §264.16(d) and this permit.
- 3. Contingency plan as required by 40 CFR §264.53(a) and this permit.
- 4. Closure plan as required by 40 CFR §264.112(a) and this permit.
- 5. Cost estimate for facility closure as required by 40 CFR §264.142(d) and this permit.
- 6. Operating record as required by 40 CFR §264.73 and this permit.
- 7. Inspection schedules as required by 40 CFR §264.15(b) and this permit.

SECTION II - GENERAL FACILITY CONDITIONS

II.A. Design and Operation of Facility. This permit is for the operation of a hazardous waste storage facility to store hazardous waste in up to 1584 (55 gallon) containers and 10 (6,000 gallon) tanks. The Permittees shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

II.B. Required Notice.

1. The Permittees shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittees expect to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.
2. When the Permittees are to receive hazardous waste from an off-site source (except where the Permittees are also the generator), they must inform the generator in writing that they have the appropriate permits for, and will accept, the waste the generator is shipping. The Permittees must keep a copy of this written notice as part of the operating record. (See Condition II.K.1.)

II.C. General Waste Analysis. The Permittees shall follow the procedures described in the attached waste analysis plan, pages 15, and 18 through 23A of the application.

1. The waste analysis plan, pages 15, and 18 through 23A of the application is hereby incorporated as Appendix A of the permit.
2. For each new hazardous waste stream accepted for storage, the Permittees shall obtain laboratory reports and analytical results prior to the initial receipt of that new hazardous waste stream at the facility. The laboratory reports and analytical results will be in accordance with the tests and testing procedures described on page 18 of the waste analysis plan (Appendix A). The tests to be performed for the initial shipment of each new hazardous waste stream shall include but not be limited to the following:

✓
Total Metals
pH
Flash Point
Cyanides

Sulfides
Reactivity
Organics
Specific Gravity

✓ Copies of this data shall be maintained in the Operating Record in accordance with 40 CFR §264.37 and Condition I.H.6 of this permit.

- ✓ 3. The Permittees shall not accept any hazardous waste stream containing hazardous wastes that are not listed in Sections III.A. or IV.A. of this permit. The permit must be modified in accordance with 40 CFR §124.5, prior to the acceptance of any hazardous waste not allowed under Conditions III.A. or IV.A. of this permit.

II.D. Security. The Permittees shall comply with the security provisions of 40 CFR §§264.14(b)(2) and (c) as stated on pages 11 to 14 in the application. Pages 11 to 14 of the application are hereby incorporated as Appendix B of the permit.

✓ II.E. General Inspection Requirements. The Permittees shall follow the inspection schedule, pages 29 to 34E of the application. Pages 29 to 34E of the application are hereby incorporated as Appendix C of the permit. The Permittees shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR §264.15(c). Records of inspections shall be kept as required by 40 CFR §264.15(d).

✓ II.F. Personnel Training. The Permittees shall conduct personnel training as required by 40 CFR §264.16. This training program shall follow the attached outline, pages 40 to 45 of the application. Pages 40 to 45 of the application are hereby incorporated as Appendix D of the permit.

1. The Permittees shall maintain training documents and records as required by 40 CFR §§264.16(d) and (e).

II.G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittees shall comply with the requirements of 40 CFR §264.17(a).

1. The Permittees shall utilize the procedures of Appendix A to ensure that incompatible or reactive wastes are not accepted.
2. The Permittees shall comply with the procedures described on page 35, Section 7.1 of the application during the transfer of ignitable liquids. Section 7.1 of the application is hereby incorporated as Appendix E of the permit.

3. The Permittees shall comply with the procedures described on page 36, Section 7.3 of the application, during the handling and storing of ignitable liquids. Section 7.3 of the application is hereby incorporated as Appendix F of the permit.

✓ II.H. Preparedness and Prevention

- ✓ 1. Required Equipment. At a minimum, the Permittees shall equip the facility with the equipment set forth in the contingency plan, pages 46 to 98 of the application as required by 40 CFR §264.32. Pages 46 to 98 of the application are hereby incorporated as Appendix G of the permit.
2. Testing and Maintenance of Equipment.
 - (a) The Permittees shall test and maintain the equipment specified in the previous permit condition as necessary to ensure its proper operation in time of emergency.
 - (b) Once cleanup and restoration activities are completed following an emergency incident, the emergency coordinator shall conduct an inspection to ensure that all emergency and safety equipment listed on page 63 (Table 9.1) of the application is fully functional and in adequate supply.
3. Access to Communications or Alarm System. The Permittees shall maintain access to the communications or alarm system as required by 40 CFR §264.34.
4. Required Aisle Space. At a minimum, the Permittees shall maintain aisle space specified on pages 99 to 101 in the application and as specified on the attached drawing titled: Site Plan. Pages 99 to 101 of the application and the drawing titled: Site Plan are hereby incorporated as Appendix H of the permit.
5. Arrangements with Local Authorities. The Permittees shall attempt to make arrangements with State and local authorities as required by 40 CFR §264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittees, the Permittees must document this refusal in the operating record.

✓ II.I. Contingency Plan.

1. Implementation of Plan. The Permittees shall immediately carry out the provisions of the contingency plan, pages 46 to 98 in the application, and follow the emergency procedures described by 40 CFR §264.56 whenever there is a fire, explosion, or release of hazardous

waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittees shall comply with the requirements of 40 CFR §264.53.
3. Amendments to Plan. The Permittees shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR §264.54.
4. Emergency Coordinator. The Permittees shall comply with the requirements of 40 CFR §264.55, concerning the emergency coordinator. The names, addresses and phone numbers of all persons qualified to act as emergency coordinators shall be supplied to the Regional Administrator at the time of certification as required by condition I.G.1.

✓ II.J. Manifest System. The Permittees shall comply with the manifest requirements of 40 CFR §§264.71, 264.72, and 264.76.

✓ II.K. Recordkeeping and Reporting.

1. Operating Record. The Permittees shall maintain a written operating record at the facility in accordance with 40 CFR §§264.73(a), (b)(1), (2), (3), (4), (5), (6), (7), and (8).
2. Biennial Report. The Permittees shall comply with the biennial report requirements of 40 CFR §264.75.
3. Availability, Retention and Disposition of Records. The Permittees shall comply with all requirements set forth under 40 CFR §§264.74(a) and (b).
4. Unmanifested Waste Report. The Permittees shall comply with all requirements set forth under 40 CFR §264.76.

II.L. Closure.

1. Performance Standard. The Permittees shall close the facility as required by 40 CFR §§264.111, 264.178, 264.197, and in accordance with the closure plan, pages 155 to 158 of the application.
 - (a) Rinse water generated during closure must be treated or disposed of in an approved RCRA hazardous waste disposal or treatment facility if testing shows the rinse water to have unacceptable levels of solvents for discharge to the POTW sewer. This must be done in lieu of flashing off the solvents in the production system as described on page 155 of the application.

Pages 155 to 158 of the application, with the exception of flashing off solvents in the production system as noted above, are hereby incorporated as Appendix I of the permit.

2. Amendment to Closure Plan. The Permittees shall amend the closure plan in accordance with 40 CFR §264.112(b) whenever necessary.
3. Notification of Closure. The Permittees shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.
4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittees shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, pages 155 to 158 (Appendix I) of the application. After receiving the final volume of hazardous waste, the Permittees shall complete closure activities in accordance with the schedule specified in the closure plan, pages 155 to 158 (Appendix I) of the application.
5. Disposal or Decontamination of Equipment. The Permittees shall decontaminate and dispose of all facility equipment as required by 40 CFR §264.114 and the closure plan, pages 155 to 158 (Appendix I) of the application.
6. Certification of Closure. The Permittees shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR §264.115.

II.M. Cost Estimate for Facility Closure. The Permittees's original closure cost estimate, prepared in accordance with 40 CFR §264.142(a), is specified on page 159 of the application. Page 159 of the application is hereby incorporated as Appendix J of the permit.

1. The Permittees must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR §264.142(b), or when using an approved state required mechanism, upon such date as required by the state.
2. The Permittees must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR §264.142(c).
3. The Permittees must keep at the facility the latest closure cost estimate as required by 40 CFR §264.142(d).

II.N. Financial Assurance for Facility Closure. The Permittees shall demonstrate continuous compliance with 40 CFR §264.143

by providing documentation of financial assurance, as required by 40 CFR §264.151, in at least the amount of the cost estimates required by permit condition II.M. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR §264.143. The Permittees shall submit the required documentation to the Regional Administrator at least 60 days before first receiving hazardous waste for storage as specified in condition I.G.2. The Permittees' financial assurance must be effective prior to the Permittees' first receipt of hazardous waste.

II.O. Liability Requirements. The Permittees shall demonstrate continuous compliance with the requirements of 40 CFR §264.147 and the documentation requirements of 40 CFR §264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs. The Permittees shall demonstrate it's compliance with this permit condition by submitting the required documentation to the Regional Administrator at least 60 days before first receiving hazardous waste for storage as specified in condition I.G.3. The Permittees' liability coverage must be effective before the Permittees' first receipt of hazardous waste.

II.P. Incapacity of Owners or Operators, Guarantors, or Financial Institutions. The Permittees shall comply with 40 CFR §264.148 whenever necessary.

SECTION III - STORAGE IN CONTAINERS

✓ III.A. Waste Identification. The Permittees may store the following wastes in containers at the facility, subject to the terms of this permit:

List of Hazardous Wastes Stored in Containers

	DOT Container*
Acetone	17E
n-Butyl Acetate	17E or 17H
Benzene	17E
Carbon Tetrachloride	17E or 17H
Cyclohexanone	17E
Cyclohexane	17E or 17H
Ethyl Acetate	17E or 17H
Ethylene Dichloride	17E or 17H
Chlorofluorocarbons not otherwise specified	17E or 17H
Hexane	17E
Heptane	17E
Isopropyl Acetate	17E or 17H
Isopropanol	17E or 17H
Methyl Ethyl Ketone	17E
Methyl Isobutyl Ketone	17E or 17H
Methyl Acetate	17E
Methylene Chloride	17E or 17H
Pentane	17E
Perchloroethylene	17E or 17H
1,1,1-Trichloroethane	17E or 17H
Trichloroethylene	17E or 17H
Toluene	17E or 17H
Xylene	17E or 17H
Chloroform	17E or 17H
Trichlorofluoromethane	17E or 17H
Assorted Non Listed Wastes (D001), which are hazardous only because they exhibit the ignitable characteristic under 40 CFR §261.21	17E or 17H
Ink Formulation Wash	Container as
Solvents (K086)	specified by DOT

*U.S. Department of Transportation specifications 49 CFR Part 178.

Container storage shall be in a storage building specifically designed and constructed to meet the specifications of pages 99 to 106 of the application and the attached drawings titled: Storage Building and Ramp and Ditch for Storage Building.

All container storage of hazardous wastes will be in 55 gallon drums. The maximum number of containers for storage of hazardous waste shall not exceed 1584 (55) gallon drums. Pages 99 to 106 of the application and the attached drawings titled: Storage Building and Ramp and Ditch for Storage Building, are hereby incorporated as Appendix K of the permit.

- ✓ III.B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittees shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.
- ✓ III.C. Compatibility of Waste with Containers. The Permittees shall ensure that the ability of the container to contain the waste is not impaired as required by 40 CFR §264.172. Hazardous wastes shall be stored in containers in accordance with the U.S. Department of Transportation packaging specifications.
- ✓ III.D. Management of Containers. The Permittees shall manage containers as required by 40 CFR §264.173.
- III.E. Containment. The Permittees shall construct and maintain the containment system in accordance with the requirements of 40 CFR §264.175(b) as specified in the attached plans and specifications, pages 99 to 106 of the application, and the attached drawings titled: Storage Building, and Ramp and Ditch for Storage Building,
- III.F. Special Requirements for Ignitable or Reactive Waste. The Permittees shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.
- ✓ III.G. Special Requirements for Incompatible Waste.
 - 1. The Permittees shall not store incompatible wastes in containers.
 - 2. The Permittees shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
 - 3. The Permittees must document compliance with III.G.(1) and (2) as required by 40 CFR §264.17(c) and place this documentation in the operating record (condition II.K.1).

SECTION IV - STORAGE IN TANKS

- ✓ IV.A. Waste Identification. The Permittees may store the following hazardous wastes in tanks, subject to the terms of this permit:

List of Hazardous Wastes Stored in Tanks

Acetone
n-Butyl Acetate
Benzene
Carbon Tetrachloride
Cyclohexanone
Cyclohexane
Ethyl Acetate
Ethylene Dichloride
Chlorofluorocarbons not otherwise specified
Hexane
Heptane
Isopropyl Acetate
Isopropanol
Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Methyl Acetate
Methylene Chloride
Pentane
Perchloroethylene
1,1,1-Trichloroethane
Trichloroethylene
Toluene
Xylene
Chloroform
Trichlorofluoromethane
Assorted Non Listed Wastes (D001),
 which are hazardous only because
 they exhibit characteristic under
 40 CFR §261.21
Ink Formulation Wash
Solvents (K086)

Tank storage of hazardous wastes shall be in (10) 6000 gallon vertical tanks. The tanks shall be constructed and located in accordance with the specifications of pages 117 to 142 of the application and the attached drawing titled: Tank Pad. Pages 117 to 142 of the application and the drawing titled: Tank Pad, are hereby incorporated as Appendix L.

IV.B. Design of Tanks. The Permittees shall construct and maintain all tanks as required by 40 CFR §264.191, as specified in the attached plans and specifications, pages 117 to 142 of the application and the attached drawing titled: Tank Pad. The Permittees shall maintain the minimum shell thickness specified below at all times to ensure sufficient shell strength.

The minimum shell thickness shall be 0.167 inches. Tank shell thickness determinations shall be conducted at least every two years according to the ultrasonic method (ASME Boiler and Pressure Vessel Code, Section V, "Nondestructive Examination, Article 5") or an equivalent method, approved in writing, by the Regional Administrator.

IV.C. General Operating Requirements.

1. The Permittees shall prevent overfilling of tanks, as required by 40 CFR §264.192(b), by the methods specified in section 12.5, page 123 of the application (Appendix L).

✓ IV.D. Special Requirements for Ignitable or Reactive Wastes.

1. The Permittees shall comply with the procedures described in the Waste Analysis Plan (Appendix A) to ensure that reactive wastes are not accepted for storage.
2. The Permittees shall not place ignitable waste in a tank unless the procedures described in Appendix L of the application are followed, as required by 40 CFR §264.198(a).
3. The Permittees shall document compliance with IV. D.1 as required by 40 CFR §264.17(c) and place this documentation in the operating record (condition II.K.1).
4. The Permittees shall maintain buffer zones around covered tanks as specified in Appendix L of the application as required by 40 CFR §264.198(b).

IV.E. Special Requirements for Incompatible Wastes.

- ✓ 1. The Permittees shall not store wastes or other materials which are incompatible with the material of construction of the tanks or incompatible with any other hazardous waste in tanks at the facility.