INSTRUCTIONS FOR UPDATING THE SAFETY-KLEEN BOYNTON BEACH, FLORIDA OPERATING PERMIT APPLICATION FLD984167791

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Attachments to Replace/Include	Reason for Replacement
(Text pages only unless otherwise indicated)	
Cover Page and Table of Contents	
Page I.B.3-1B	Added references to antifreeze tank.
Attachment I.D.2	Removed references to drum colors.
	Removed references to drum sizes.
	Added Fluid Recovery Service (FRS) wastes.
	Added antifreeze tank description.
Attachment I.D.3	Added Fluid Recovery Service (FRS) wastes.
	Added tank as process code for ethylene glycol.
Page II.A.1(a)-2D	Added references to antifreeze tank.
Page II.A.1(c)-1A	Added references to antifreeze tank.
Attachments II.A.4(b)	Added antifreeze in tanks.
(text pages only)	Added Fluid Recovery Service (FRS) wastes.
	Removed references to drum sizes.
Attachment II.A.4(b), pages iii and II.A.4(b)-3C	Changed alternate emergency coordinator.
Page II.A.4(b)-3ADECEIVED	Changed reference from oil tank to antifreeze tank.

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Attachments to Replace/Include	Reason for Replacement
Attachment II.A.4(b), Appendix B	Reissue letters to local authorities.
Page II.A.4(d)-5A	Changed reference from oil tank to antifreeze tank.
Attachment II.A.5, Table II.A.5-1	Added Fluid Recovery Service (FRS) wastes.
	Added antifreeze tank.
Pages II.A.6-2A, II.A.6-2B, II.A.6-2C, and II.A.6-2D	Added Fluid Recovery Service (FRS) wastes.
	Added antifreeze tank references.
Attachment II.B.1	Reference to Fluid Recovery Service (FRS) wastes on page II.B.1-2.
Attachment II.B.3	Removed references to drum color.
	Removed references to drum sizes.
	Added references to Fluid Recovery Service (FRS) wastes.
Attachment II.B.4, Table II.B.4-1	Added references to Fluid Recovery Service (FRS) wastes.
	Provided table of container sizes.
	Removed references to color of drums.
Attachment II.B.6	Changed drum sizes on page II.B.6-2.
	Added references to Fluid Recovery Service (FRS) wastes.
Attachment II.C-1 (Remove no pages)	Add new tank assessment to attachment.
Attachment II.C-2 and page II.C-2-1A	Added spent antifreeze tank assessment. Added reference to the 20,000-gallon spent antifreeze tank.
Attachment II.C-7 and page II.C-7-1A (text pages only)	Added reference to the 20,000-gallon spent antifreeze tank.



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Attachments to Replace/Include

Attachment II.C-9

Attachment II.C-12(a)

Attachment II.K.1

Reason for Replacement

Added reference to the 20,000-gallon spent antifreeze tank.

Added reference to the 20,000-gallon spent antifreeze tank on page II.C.12(a)-2.

Added reference to the 20,000-gallon spent antifreeze tank on pages II.K.1-1 and II.K.1-2.

Added Fluid Recovery Service (FRS) wastes.

Changed drum sizes.



RCRA OPERATING PERMIT APPLICATION SAFETY-KLEEN CORP. LOT 46B QUANTUM INDUSTRIAL PARK BOYNTON BEACH, FLORIDA

FLD 984167791

April 23, 1991

Revised June 25, 1991

Revised December 6, 1991

Prepared for:

Safety-Kleen Corp. 777 Big Timber Road Elgin, Illinois 60123

Prepared by:

Environmental Resources Management-South, Inc. 9501 Princess Palm Avenue, Suite 100 Tampa, Florida 33619 (813) 622-8727



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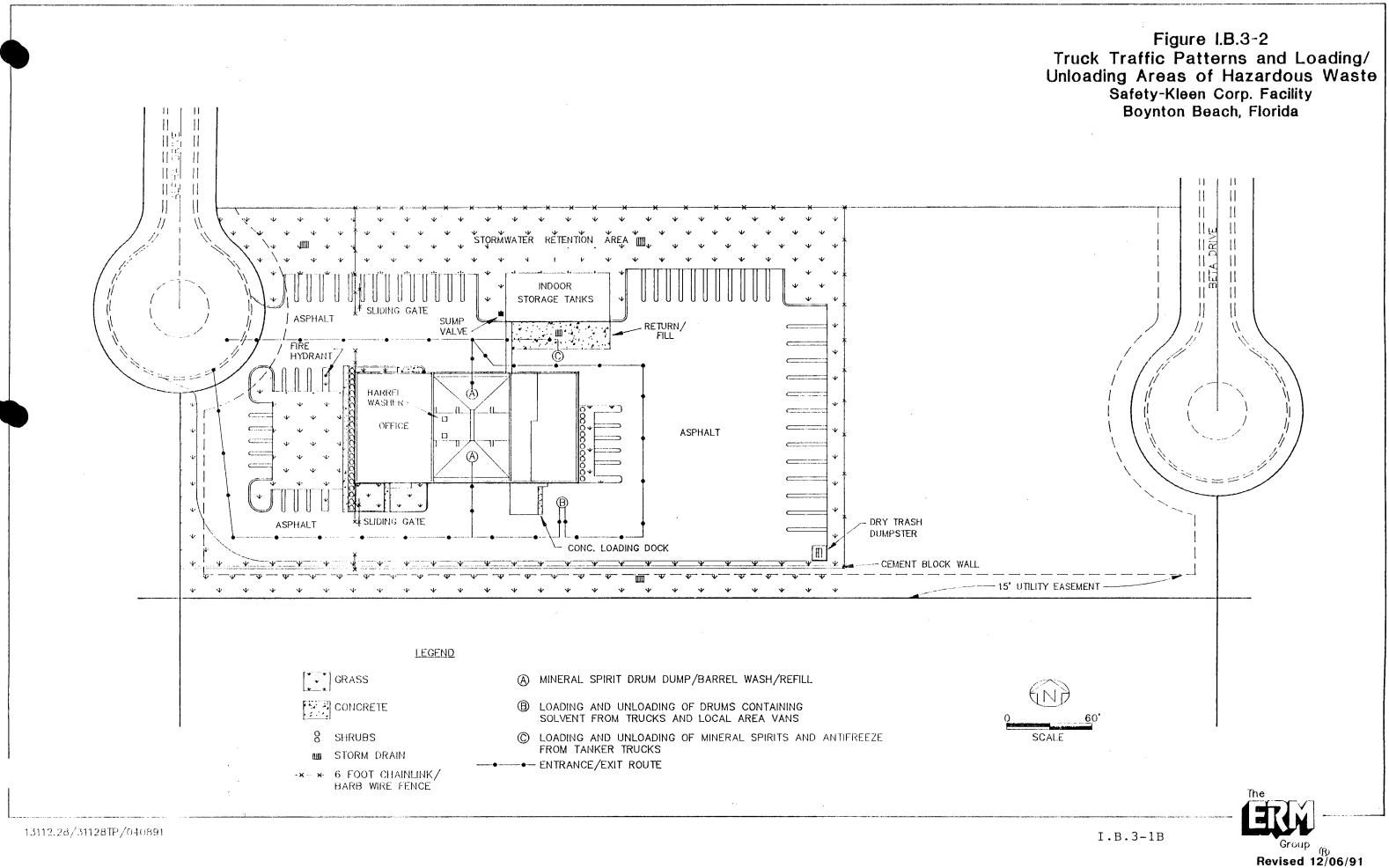


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PART I

GENERAL FACILITY INFORMATION





ATTACHMENT I.D.2

DESCRIPTION OF FACILITY OPERATION



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ATTACHMENT I.D.2 DESCRIPTION OF FACILITY OPERATION

DESCRIPTION OF THE BUSINESS

Safety-Kleen Corp. of Elgin, Illinois 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 hydrocarbon and chlorinated solvents and small parts washing equipment. A unique feature of this business concept is that the solvent is produced through recycling the used solvent that is leased to the customers. Approximately two-thirds of the clean solvent leased has been previously used by the customers.

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 service centers (sales branches) located in 45 states domestically that warehouse the products and equipment required to service the customers in their sales areas. On a regular 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 types of solvents.

Basically, Safety-Kleen handles three types of parts washer solvents: a mineral spirits solvent and old and new formulations of immersion cleaner. The old immersion cleaner solvent is labeled under the trade name of "Immersion Cleaner and Carburetor and Cold Parts Cleaner #609." It is a two-phase system consisting of an upper aqueous (water) layer and lower non-aqueous (solvent) layer. The water phase consists of water and Dresinate TX (sodium soap of tall oil). The solvent phase is composed of methylene chloride, orthodichlorobenzene, cresylic acid, and an amines additive. A new immersion



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cleaner is being marketed under the name #699 and will eventually replace the old immersion cleaner. It is a non-chlorinated solvent mixture. The solvent is composed of heavy aromatic naphtha, N-methyl-2-pyrolidon dipropylene glycol methyl ether, monoethanolamine and oleic acid. It contains a maximum of 1 percent total chlorinated solvents.

The solvents are distributed and collected by their service representatives. Containers are transported in specially-equipped, enclosed route trucks. Clean solvents are distributed from and used solvents returned to the service center where they are stored in separate tanks for the clean and used mineral spirits bulk storage. Warehouse space is dedicated for the storage of both clean and used immersion cleaner containers. Safety-Kleen leases parts washing equipment, including partially filled containers, which double as the solvent reservoir of the parts washer. During servicing, the quantity of used solvent removed from each machine ranges from 5 to 20 gallons. The mineral spirits are collected in containers. The 609 and 699 Immersion Cleaners are also housed in containers.

The mineral spirits are transported in covered containers between the service center and customers. Upon returning to the service center, the used mineral spirits are transferred from the containers into a wet dumpster (solvent return receptacle) in which coarse solids in the mineral spirits are retained. Used mineral spirits in the wet dumpster flow into a 15,000-gallon aboveground tank for storage. Used mineral spirits solvent is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers a load of clean mineral spirits. The sludge in the wet dumpster is periodically cleaned out, containerized, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation.

Periodically, a company truck is dispatched from one of Safety-Kleen's nationwide solvent recycle facilities to the service center to deliver a load of clean solvent and pick



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up a load of used solvent. Mineral spirits are transported in bulk tank trucks between the service centers and the recycle facilities. The Immersion Cleaner remain in the covered containers during transfer between the service centers and the recycle facilities. Approximately 97 percent of the solvent handled in the parts washer business is mineral spirits, while the remainder is immersion cleaner.

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are containerized on the customer's premises and are periodically collected by a sales representative. The containerized waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. Approximately 35 percent of this waste is returned to dry cleaners as usable product.

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Paint gun cleaning machines are leased to customers with a reservoir of lacquer thinner (for cleaning the paint guns). On a periodic basis the reservoir is replaced and the spent solvent taken back to the facility for shipment to a reclamation facility. Wastes containing various thinners and paints are collected in containers on the customer's premises. The sales representative collects these containers and stores them in the container storage area. These wastes are periodically shipped to a reclaimer and the regenerated solvent is distributed to Safety-kleen customers for use as product.

Safety-Kleen offers generators of large quantities of Fluid Recovery Service (FRS) wastes a reclamation service through its FRS wastes collection service. Wastes containing mineral spirits, halogenated solvents, and lacquer thinners are shipped from the generator to the accumulation center in containers. The containers are then shipped to the Safety-Kleen recycle center in Lexington, South Carolina or to an independent reclaimer.



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In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. These wastes are deposited into a 150-gallon translucent carboy by the customer, on the customer's premises, and the carboy is pumped into containers or a 3,500-gallon tanker truck by a sales representative. It is then placed in the container storage warehouse or a bulk tank in the tank building for shipment to a Safety-Kleen recycle center. Approximately 35 percent of this waste is returned to customers as usable product.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the service center to the customer, from the customer to the service center, from the service center to the recycle facility and then from the recycle center back to the service center. The small quantities of residue remaining in the storage tanks at the service centers and after distillation of the used solvent at Safety-Kleen's solvent recycling facilities are disposed of in accordance with applicable laws and regulations.

This closed loop supplies Safety-Kleen with most of its solvent requirements; the resultant stabilized cost benefits are passed on to its customers. Ownership of the solvent remains with Safety-Kleen; the service center managers are accountable for the quantities of clean and used solvents handled by their branch operations. The service center is basically a temporary storage and transfer facility. By FDER definition, however, these centers are considered to be the waste generator.



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ATTACHMENT I.D.3

WASTE TYPE



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ATTACHMENT I.D.3-1 SAFETY-KLEEN CORP. FACILITY BOYNTON BEACH, FLORIDA

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Mineral Spirits	S01 S02	993	D001 and Codes Listed in Note Below
Dumpster Sediment	S01	Included Above	D001 and Codes Listed in Note Below
Tank Bottoms	S01	Included Above	D001 and Codes Listed in Note Below
Spent Ethylene Glycol	S01 S02	5,000	Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula)	S01	31	F002, F004, and Codes Listed in Note Below
(New Formula)	S01	Included Above	Codes Listed in Note Below
Dry Cleaning Waste	S01	350	D001 or F002 and Codes Listed in Note Below
Paint Waste	S01	50	D001, F003, F005 and Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01	250	D001, F001, F002, F003, F005, and Codes Listed in Note Below
Off Specification Perchloroethylene	S01	10	U210

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



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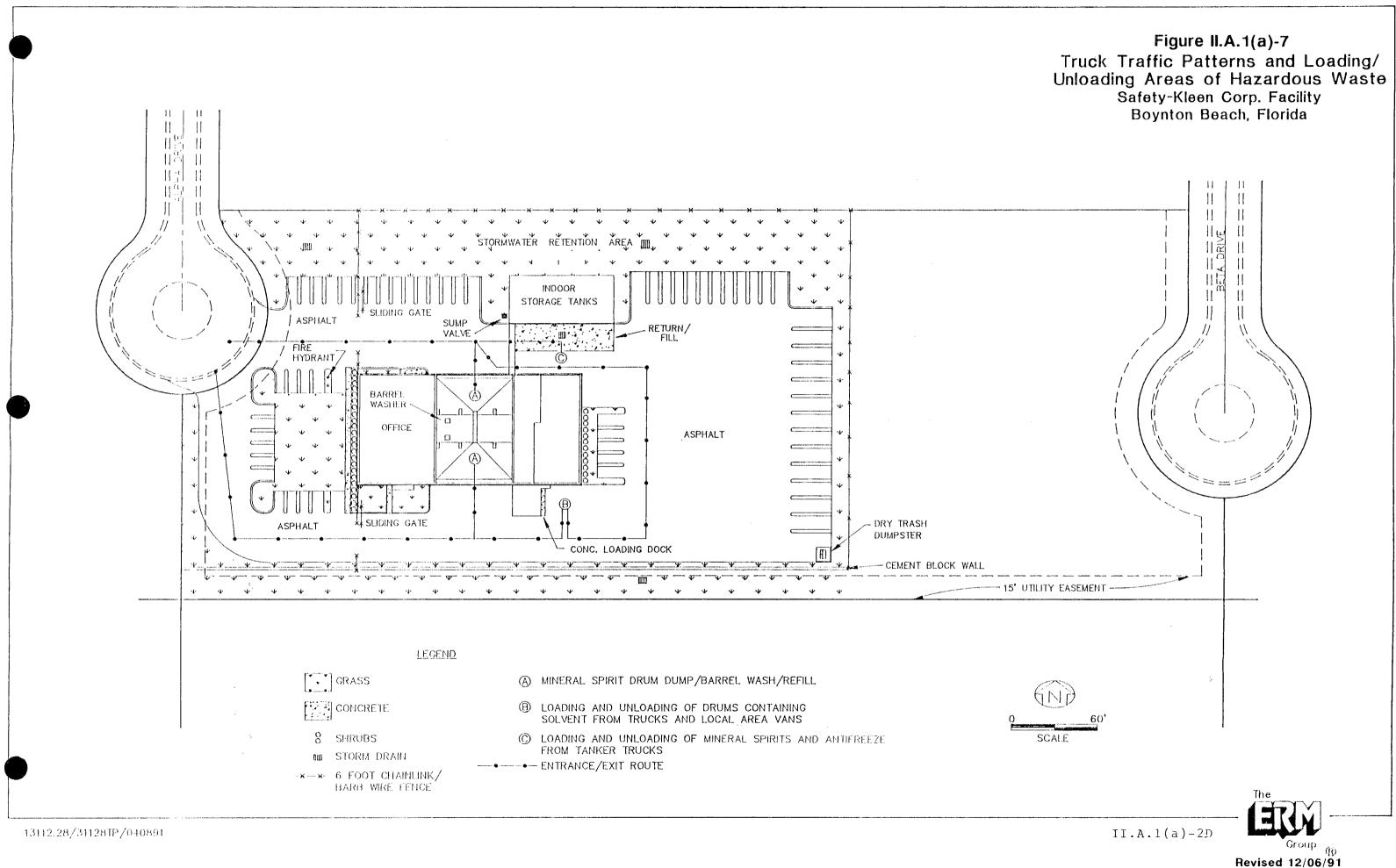
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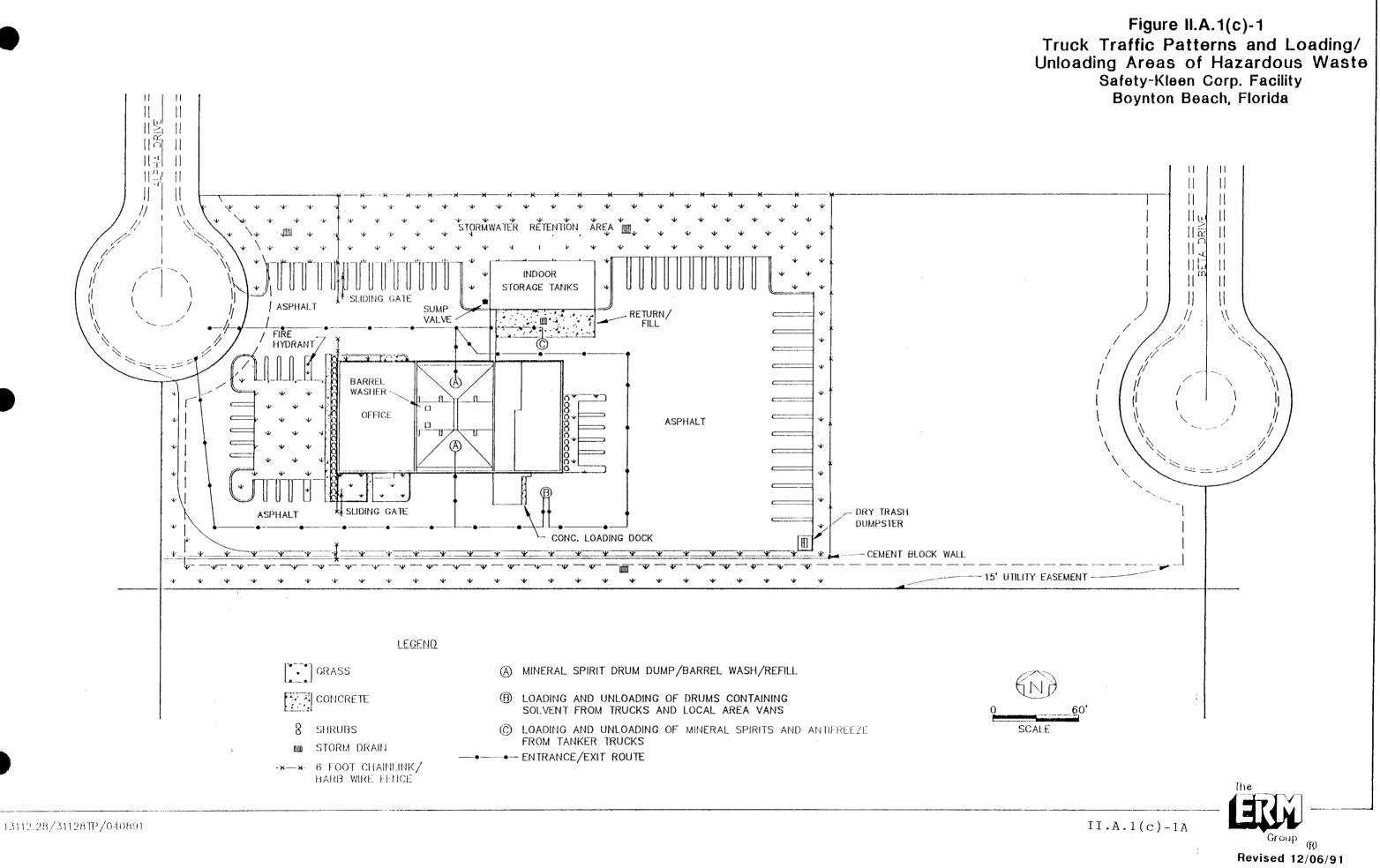
GENERAL

Revision 2 - 12/06/91

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ATTACHMENT II.A.4(b)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS



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APPENDICES

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EMERGENCY PHONE NUMBERS

Emergency Coordinators

Primary:Thomas H. SandsAlternate:Jereme Breen9873 Lawrence Road, G20565 Deer PathBoynton Beach, FL 33436Lake Worth, FL 33424Home:(407) 736-8968Home: No phone availableOffice:(407) 736-1339Office: (407) 736-1339

Emergency Notification Phone Numbers

Safety-Kleen Environmental Department Telephone (708) 888-4660 (24-hour number)

National Response Center Telephone (800) 424-8802

Southeast Florida District of the FDER, 1900 South Congress Avenue, Suite A, West Palm Beach, Florida (407) 433-2650 or (904) 488-1320 - 24 hours.

South Florida Water Management District, West Palm Beach, Florida (407) 686-8800

Emergency Team to be Notified

Boynton Beach Fire Department 150 E. Boynton Beach Blvd. Boynton Beach, FL 33435 (407) 738-7430

Boynton Beach Police Department 135 N.E. 1st Avenue Boynton Beach, FL 33435 (407) 732-8132

Bethesda Memorial Hospital 2815 S. Seacrest Blvd. Boynton Beach, FL 33435 (407) 737-7733 or 278-7733 O.H. Materials Company P.O. Box 551 Findlay, OH 45840 (800) 537-9540 (Primary Cleanup Contractor)

AMO Pollution Services, Inc. P.O. Box 311B Canonsburg, PA 15317 (800) 325-1398 (Secondary Cleanup Contractor)

Ryckman's Emergency Action and Consulting Team P.O. Box 27310 St. Louis, MO 63141 (800) 325-1398 (Secondary Cleanup Contractor)

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ATTACHMENT II.A.4(b)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS

GENERAL INFORMATION

Purpose

The contingency plan and emergency procedures are designed to ensure that Safety-Kleen is prepared to address emergency situations rapidly and in a manner to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or nonsudden release of hazardous material constituents to the air, soil, surface water, or ground water at the facility.

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

General Description of Activities

The business activities conducted a the Boynton Beach Service Center relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provisions of a solvent leasing service for the customers. Clean solvents are distributed from and the used solvents are returned to the service center, where separate storage tanks are utilized for the storage of clean and used mineral spirits (solvent) and spent antifreeze, and warehouse space is designated for the storage of containers of both clean and used immersion cleaner, mineral spirits, tank bottoms, dumpster mud, antifreeze, paint, dry cleaning wastes (chlorinated solvent), and FRS wastes. Safety-Kleen uses a container color scheme as a part of its waste management system. An overpack container is used for the management of containers whose integrity has been compromised.

II.A.4(b)-1



The mineral spirits are transported in covered containers between the service center and customers. Upon returning to the service center, the used mineral spirits are transferred from the containers into a wet dumpster (solvent return receptacle) in which coarse solids in the mineral spirits are retained. Used mineral spirits in the wet dumpster flow into a 15,000-gallon aboveground tank for storage. Used mineral spirits solvent is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers a load of clean mineral spirits. The sludge in the wet dumpster is periodically cleaned out, containerized, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation.

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 service center. Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers and are stored temporarily at the service center. The containers are picked up periodically for recycling at the recycle facility.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in containers.

The antifreeze waste is approximately one-third water and two-thirds antifreeze (ethylene glycol) and contaminants. The waste is collected in 150-gallon carboys at the customer's facility. The spent antifreeze is then transferred to containers or a 3,500-gallon tanker truck. The tanker truck empties the waste into a 20,000-gallon storage tank. The containerized waste is placed in the container storage area prior to shipment to a reclamation facility.

The paint wastes consist of various lacquer thinners and paints collected in containers.



II.A.4(b)-2

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. The MSDSs provided in Appendix A represent the biological, physical, and chemical properties of both the fresh and used products.

Figures II.A.4(b)-1 and II.A.4(b)-2 shows the basic site and floor plans, particularly, the locations of waste management facilities, emergency equipment, facility storage, and evacuation routes.

EMERGENCY NOTIFICATION

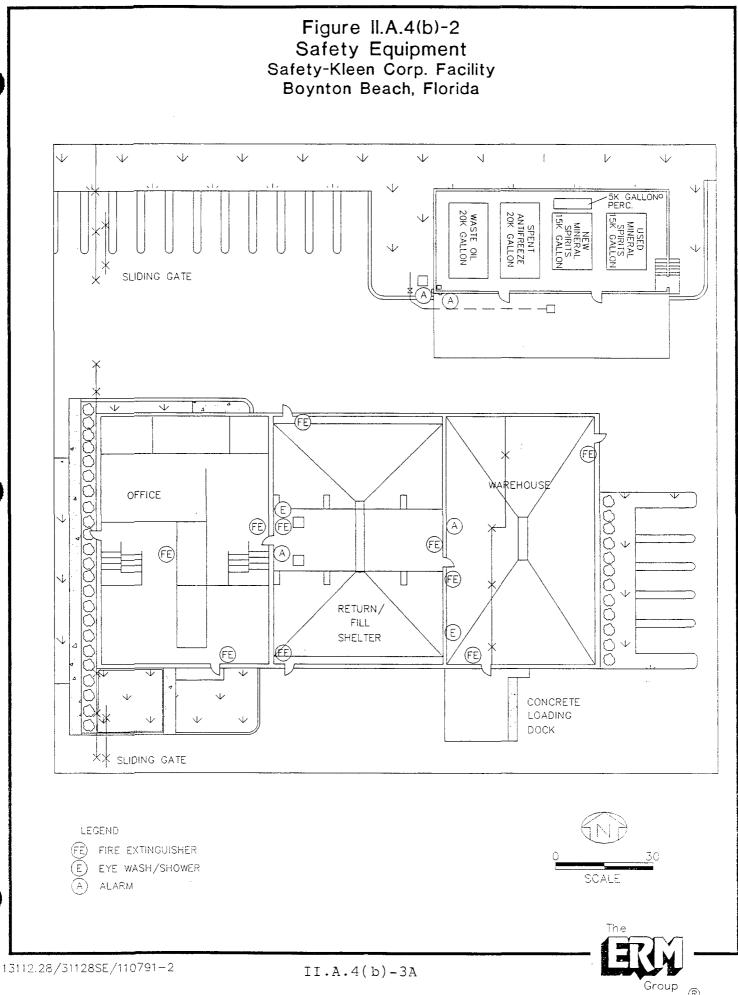
Emergency Coordinator

The Branch Manager or his designee is the emergency coordinator. Table II.A.4(b)-1 includes the names, home addresses, and both office and home phones of the primary emergency coordinator and his alternatives. At least one employee is either present on the facility premises or on call with responsibility for 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 in Table II.A.4(b)-1. A Telephone Notification Log is shown in Table II.A.4(b)-2.





Revised 12/08/91

TABLE II.A.4(b)-1EMERGENCY NOTIFICATION

Emergency Coordinators

Primary: Thomas H. Sands Alternate: 9873 Lawrence Road, G205 Boynton Beach, FL 33436 Home: (407) 736-8968 Office: (407) 736-1339

Jereme Breen 65 Deer Path Lake Worth, FL 33424 Home: No phone available Office: (407) 736-1339

Emergency Notification Phone Numbers

Safety-Kleen Environmental Department Telephone (708) 888-4660 (24-hour number)

National Response Center Telephone (800) 424-8802

Southeast Florida District of the FDER, 1900 South Congress Avenue, Suite A, West Palm Beach, Florida (407) 433-2650 or (904) 488-1320 - 24 hours.

South Florida Water Management District, West Palm Beach, Florida (407) 686-8800

Emergency Team to be Notified

Boynton Beach Fire Department 150 E. Boynton Beach Blvd. Boynton Beach, FL 33435 (407) 738-7430

Boynton Beach Police Department 135 N.E. 1st Avenue Boynton Beach, FL 33435 (407) 732-8132

Bethesda Memorial Hospital 2815 S. Seacrest Blvd. Boynton Beach, FL 33435 (407) 737-7733 or 278-7733 O.H. Materials Company P.O. Box 551 Findlay, OH 45840 (800) 537-9540 (Primary Cleanup Contractor)

AMO Pollution Services, Inc. P.O. Box 311B Canonsburg, PA 15317 (800) 325-1398 (Secondary Cleanup Contractor)

Ryckman's Emergency Action and Consulting Team P.O. Box 27310 St. Louis, MO 63141 (800) 325-1398 (Secondary Cleanup Contractor)



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. 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:

- a. 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.
- b. 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 be requested.

- c. In case of a release outside of the containment area that is deemed immediately uncontainable or unrecoverable, a local emergency response agency and/or specialty cleanup contractor shall be called in.
- d. After termination of a fire or explosion, 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.
- e. 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.
- f. 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 that could threaten human health, or the environment outside the facility, the coordinator must report those findings, as follows:

a. 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.



II.A.4(b)-5

b. The coordinator must immediately notify the Southeast Florida District of the FDER, (407) 433-2650, and the National Response Center (800) 424-8802, by telephone.

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 emergency number of the Safety-Kleen Corporation Environmental, Health and Safety Department ((708) 888-4660).

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 buildup, 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:

- a. No waste that may be incompatible with the released material is treated or stored until cleanup procedures are completed; and
- b. 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 or 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 Florida District of the FDER, 1900 South Congress Avenue, Suite A, West Palm Beach, Florida 33406 (407) 433-2650. The report must include:

- a. Name, address, and telephone number of the owner or operator;
- b. Name, address, and telephone number of the facility;
- c. Date, time, and type of incident (e.g., fire, explosion);
- d. Name and quantity of material(s) involved;



II.A.4(b)-7

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- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. 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 30 gallons of waste) pollution incident.

a. Moving of containers.

Every time a container is moved, a chance exists that it could tip over or be dropped. To minimize the possibility of spillage of solvent under those conditions, all containers must remain covered before being moved.

- b. Delivery truck container transfers.
 - Individual delivery containers contain from five to 55 gallons of waste, a quantity which can be contained by oil sorbent clay or pads, if accidentally spilled.
 - (2) Each vehicle is equipped with a hoist and hand cart for ease of moving clean solvent off the truck and into the customer's shop and returning the dirty solvent to the truck.
 - (3) Clamp type lids are on containers during movement to prevent a spill.



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II.A.4(b)-8

- (4) Each truck should contain a shovel and a quantity of sorbent material to contain a minor spill.
- (5) The cargo should 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 Material Safety Data Sheet (MSDS), the worker would enter the area wearing rubber gloves, boots, and respirator and mop up the liquid and return it to dirty storage. The cleanup is completed only when the workers have cleaned themselves and the emergency equipment with soap and water. Spills originating in the container return/fill area should be contained within its collection trench. This area has three-inch sloped concrete sides leading to the trench. Spills originating in the warehouse area should be retained within its collection trench. The concrete floor in this area is sloped two inches toward the trench. The concrete floor in both these areas is coated with sealant compatible with and resistant to the chemicals stored at this facility.

Spills on Concrete Pads

Concrete pads in loading and unloading areas are, in most cases, equipped with emergency containment. Under most spill conditions, product can be totally contained on the concrete surface and in the catchment system. Upon containment, arrangements must be immediately undertaken to recover the material. Any soil that may be involved must be removed and treated as a hazardous waste.

Tank Spills or Leakage

Aboveground tanks are completely enclosed within a building which has a monolithically poured slab and 36-inch high sides to contain any spilled or leaked solvent. The surface of the monolithic pour (bottom and sides) are coated with a concrete sealant compatible

with and resistant to the chemicals stored in this area. The remainder of the building is concrete blocks from three feet to the roof. The containment system has been sized in accordance with the regulations, and the product 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 treated as hazardous waste.

Spill Control Procedures

If a harmful discharge occurs:

- a. Stop the discharge, if possible, by immediately transferring the liquid to a good container.
- b. Retain, contain, or slow the flow of the material, if possible, by diking with sorbent pad or dirt. Appropriate personal protective equipment should be worn. Pump and mop up the liquid from the floor into a good container and return the container to storage and then later to the 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 should be collected for proper disposal at a Safety-Kleen recycle center.
- c. If the material escapes the containment efforts, <u>immediately</u> call the cleanup contractor with response time less than two hours (Table II.A.4(b)-1). Record the date, time, and name of person taking the message. Call the primary emergency coordinator, if he is absent.
- d. Immediately recover spilled solvent to reduce property and environmental damage using the safety equipment stored onsite for such situations (Figure II.A.4(b)-2) or



II.A.4(b)-10

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call in emergency response contractors (Table II.A.4(b)-1). <u>Start recovery</u> 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 recycle center. In addition, the recovered solvent will be sent to a Safety-Kleen recycle center for reclamation.

- e. Report any incident as soon as possible to Safety-Kleen Corporate Environmental Department on the 24-hour telephone line: (708) 888-4660. If the Environmental Department does not respond within 30 minutes, call the National Response Center (telephone: (800) 424-8802) and Southeast Florida District of the FDER, 1900 South Congress Avenue, Suite A, West Palm Beach, Florida (407) 433-2650.
- f. The person reporting a spill should be prepared to give his 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.



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Every spill must be recorded on the attached form with the revision of the contingency plan to prevent similar spills in the future. A copy of this report is sent to the Corporate Environment Health and Safety Department.

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

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

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.

Concrete surfaces/containment areas:

II.A.4(b)-12

- 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. It is believed that a 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 dealt with 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/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 telephones, fire extinguisher, the first-aid kit, and the emergency eyewash/shower. Other emergency response equipment (Table II.A.4(b)-3) 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.

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

FIRE CONTROL PROCEDURES

Call the Fire Department.

a. Immersion cleaner #609 (old formula) (which is a mixture of chlorinated solvents and water) and dry cleaning wastes are initially not flammable, but produce toxic gases and hydrochloric acid at elevated temperatures (about 1200° F).



II.A.4(b)-14

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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 and local hospital (Table II.A.4(b)-1) when injury occurs and/or order of on-lookers and traffic is to be maintained.

Areas in the service building (offices, container fill/return, container storage) and storage tank building have automatic fire fighting sprinkler systems (Figure II.A.(b)-3). In addition, building walls have a four hour rating.

AVAILABILITY AND REVISION OF THE 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:

- a. The facility license is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
- b. The list or location of emergency equipment changes;



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- c. The facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
 - (1) Materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or
 - (2) Changes in response necessary in an emergency.
- d. The names, addresses, or phone numbers of emergency coordinators change;
- e. The employee assigned to each emergency task changes, or
- f. 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 (Material 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.

Potential primary and secondary spill control contractors as well as sorbent suppliers are identified in the Contingency Plan and Emergency Procedures.

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.



II.A.4(b)-16

Appendix B includes copies of letters which have been transmitted to local authorities for emergency response in the event of an incident where public health or environment is threatened.

EVACUATION PLAN

In an uncontrolled emergency, all persons are to be evacuated from the area by means of a verbal cry and assemble across from the entrance drive to the facility (Figure II.A.4(b)-1). Assure that all personnel are accounted for and out of the area. 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.

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.



APPENDIX B

LETTERS TO LOCAL AUTHORITIES





December 7, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Boynton Beach Police Department 135 NE 1st Avenue Boynton Beach, FL 33435

RE: Safety-Kleen Corp. (3-097-01), Lot 46B, Quantum Industrial Park, Boynton Beach, Florida

Dear Sir:

Under terms of U.S.E.P.A. Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize police and fire departments with the layout of the facility, places where facility personnel would be working, entrances to roads inside the facility, and possible evacuation routes.

A copy of the Contingency Plan and Emergency Procedures is enclosed for your file. A facility layout is attached to show where facility personnel would normally be working, entrances to road inside facilities and possible evacuation routes.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter and indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance.

If you have any questions or desire to visit the facility, please contact the branch manager, Mr. Thomas H. Sands (407) 736-1339.

Sincerely,

iter J. Son Juntin

Victor L. San Agustin, P.E. Regional Environmental Engineer Tampa Region

pjh/mmm

Enclosure(s)

13112.28B/TSK10/EXHIBITS.IE



December 7, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Boynton Beach Fire Department 150 East Boynton Beach Boulevard Boynton Beach, FL 33435

RE: Safety-Kleen Corp. (3-097-01), Lot 46B, Quantum Industrial Park, Boynton Beach, Florida

Dear Sir:

Under terms of U.S.E.P.A. Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize police and fire departments with the layout of the facility, places where facility personnel would be working, entrances to roads inside the facility, and possible evacuation routes.

A copy of the Contingency Plan and Emergency Procedures is enclosed for your file. A facility layout is attached to show where facility personnel would normally be working, entrances to road inside facilities and possible evacuation routes.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter and indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance.

If you have any questions or desire to visit the facility, please contact the branch manager, Mr. Thomas H. Sands (407) 736-1339.

Sincerely,

Victor L. Son Quitin

Victor L. San Agustin, P.E. Regional Environmental Engineer Tampa Region

pjh/mmm

Enclosure(s)

13112.28B/TSK10/EXHIBITS.IE



December 7, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Bethesda Hospital 2815 South Seacrest Boulevard Boynton Beach, FL 33435

RE: Safety-Kleen Corp. (3-097-01), Lot 46 B, Quantum Industrial Park, Boynton Beach, Florida

Dear Sir:

Under terms of U.S.E.P.A. Regulation 40 CFR 264.37, Safety-Kleen Corp. is required to familiarize local hospitals with the properties of the materials handled at their facilities and the types of injuries or illnesses which could result from fires, explosions, or releases at this facility.

A copy of the Contingency Plan and Emergency Procedures is enclosed for your file. A facility layout is attached to show where facility personnel would normally be working, entrances to road inside facilities and possible evacuation routes.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter and indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance.

If you have any questions or desire to visit the facility, please contact the branch manager, Mr. Thomas H. Sands (407) 736-1339.

Sincerely,

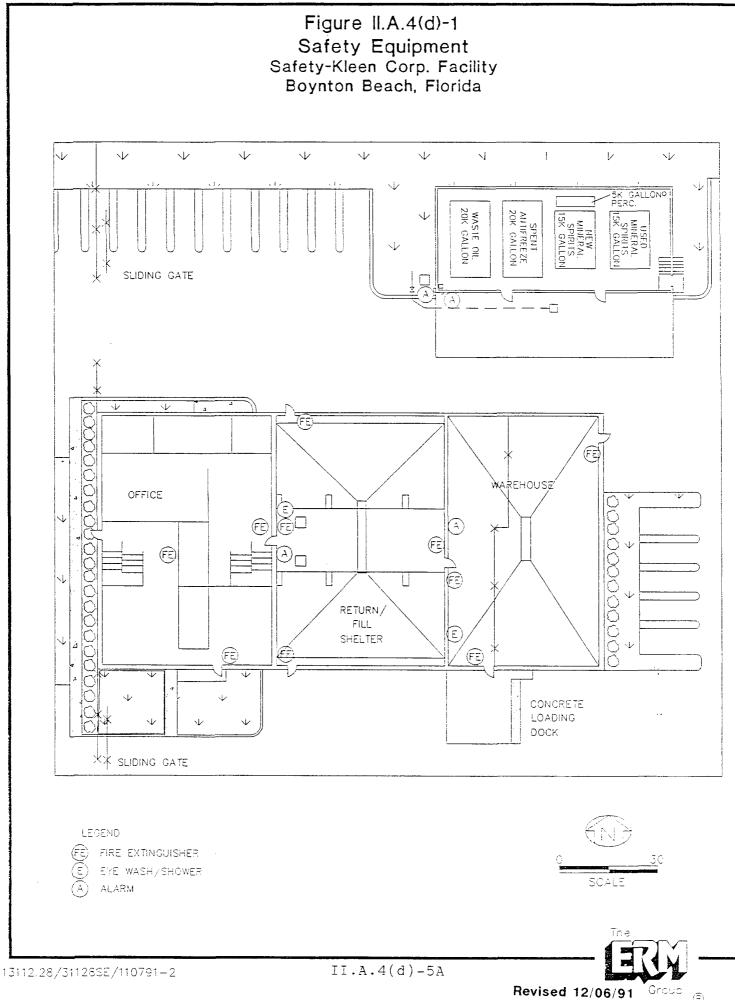
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Victor L. San Agustin, P.E. Regional Environmental Engineer Tampa Region

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Enclosure(s)

13112.28B/TSK10/EXHIBITS.IE



ATTACHMENT II.A.5

WASTE ANALYSIS REPORT

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ATTACHMENT II.A.5 WASTE ANALYSIS REPORT

In accordance with U.S. EPA Hazardous Waste Regulations, seven types of hazardous waste have been identified at the service center:

 The used mineral spirits solvent, returned from customers in separate containers transferred and stored in the aboveground tank awaiting shipment to the recycle facility is considered to be an Ignitable Waste (D001) and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);

Mineral spirits, dumpster mud, and tank bottom sludge accumulated in the solvent return receptacles (wet dumpsters) and in the sludge tank, is considered to be an Ignitable Waste (D001) a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);

2. The used chlorinated solvent #609 (old formula), returned from customers in separate containers and remaining in the same container for shipment to the recycle facility is considered to be a Listed Waste from Non-Specific sources (F002 and F004); and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);



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The used immersion cleaner #699 (new formula), returned from customers in separate containers and remaining in the same container for shipment to the recycle facility, is considered a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);

- Dry cleaning wastes consist of spent filter cartridges, powder residue from 3. diatomaceous or other powder filter systems and still bottoms. While approximately 80 percent of Safety-Kleen's customers use perchloroethylene (F002) and a characteristic waste by TCLP leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043), approximately 17 percent use mineral spirits (D001) and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043), and the remaining three percent use trichloro-trifluoroethane (F002) and a characteristic waste by TCLP leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);
- 4. Antifreeze waste is approximately one-third water with the remaining third being antifreeze (ethylene glycol) and contaminants. As a protective measure, the container storage area for spent antifreeze is being permitted to store wastes with the following TCLP waste codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029,



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D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043; and

- 5. The paint waste, collected in containers at the customer's place of business and stored in the container storage area, is considered to be an ignitable waste (D001); a listed waste (F003 and F005); and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).
- Eight solvents are collected from FRS waste users: mineral spirits (D001, D004, 6. D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); 1,1,1-trichloroethane (F001, F002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); perchloroethylene and trichloroethylene (F001, F002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); methylene chloride (F001, F002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); 1,1,2-trichloro-1,2,2-trifluoroethane (F001, F002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043), lacquer thinners (F003, F005, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032,



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D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); and waste oil which exhibits a characteristic (D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). These wastes, except characteristic waste oil, are shipped in containers and are stored on pallets. It is anticipated that 39,000 gallons of spent mineral spirits, 158,000 gallons of spent halogenated solvents and 60,000 gallons of spent lacquer thinners will be shipped from the service center to a reclaimer on an annual basis.

7. Off specification perchloroethylene (U210) resulting from the management of bulk perchloroethylene. This may have some minor impurities. This is shipped from the service center to a reclaimer.

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

USED MINERAL SPIRITS

The clean mineral spirits solvent is labeled under the trade name of "Safety-Kleen 105 Solvent", so-named because of the flash point of the solvent being 105°F (minimum). Chemically, the solvent primarily consists of petroleum hydrocarbon fraction (the mineral spirits) with boiling points between 310°F and 400°F. Impurities, such as light aromatic hydrocarbons (LAHC) and chlorinated hydrocarbons, usually constitute less than one percent of the total volume. The mineral spirits constitutes over 99.5 percent of the total volume of the solvent.



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The used mineral spirits solvent consists primarily of mineral spirits solvent plus water, solid, oil, and grease picked up in the various degreasing operations. In most instances, no water is associated with the used solvent; however, at times, the water content may range from one percent to as much as 50 percent. The oily bottoms may range from 2 percent to 10 percent, by volume, in the used solvent.

Chemically, the composition of the solvent fraction in the used mineral spirits solvent is essentially the same as the clean solvent, as shown in analyses.

An estimated 275,000 gallons of used mineral spirits are expected to be shipped to a recycle center from this facility.

USED MINERAL SPIRITS BOTTOM SLUDGE

This is material settled from used mineral spirits in the aboveground tanks. It contains basically soils, oil and grease, and some water picked up in the degreasing operations, together with a small amount of mineral spirits. Analyses have shown that the sludge is an ignitable waste and might also be considered toxic using TCLP standards.

The sludge is removed from the aboveground tank periodically and shipped to a Safety-Kleen facility for reclamation.

USED MINERAL SPIRITS DUMPSTER MUD

This waste material is accumulated in the wet dumpsters when emptying the used mineral spirits from the containers into the aboveground storage tanks. The nature of this waste is similar to the used mineral spirits bottom sludge, except with some small metal parts and less mineral spirits. It is regarded as an ignitable waste and often is also considered a characteristic waste using TCLP standards.



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The sludge in the dumpsters is cleaned out frequently. The waste is containerized and shipped to Safety-Kleen's facility for recycling. Approximately 150 containers (1,500 gallons) of dumpster mud will be removed from this center annually.

USED IMMERSION CLEANER

The old formula clean chlorinated solvent is labeled under the trade name of "Immersion Cleaner and Carburetor and Cold Parts Cleaner #609." It is a two-phase system consisting of an upper aqueous (water) layer and lower non-aqueous (solvent) layer. The water phase consists of water and Dresinate TX (a sodium soap of tall oil). The solvent phase is composed of methylene chloride, orthodichlorobenzene, cresylic acid, and an amines additive.

A new "Immersion Cleaner and Carburetor and Cold Parts Cleaner #699" is also being leased. It is a heavy aromatic naphtha, N-methyl-2-pyrolidon dipropylene glycol methyl ether, monoethanolamine and oleic acid, and contains a maximum of 1 percent total chlorinated solvents.

The used immersion cleaner is basically unchanged from its clean state, except oil, grease, and other solids may be picked up during the various degreasing operations. The spent solvent is non-flammable. It is regarded as toxic because of the contents of various solvents. Less than five gallons of waste is returned in each container. It is anticipated that 7,500 gallons of used immersion cleaner will be stored at this facility annually.

DRY CLEANING WASTES

Solvent used in dry cleaning of clothing is commonly tetrachloroethylene (or perchloroethylene). Hence, waste generated from dry cleaning operations contains various concentrations of the solvent. Basically, wastes generated by dry cleaning facilities are in the following forms.



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- 1. Cartridge Filter: In addition to the construction materials consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease, and undissolved elements such as lint and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight.
- 2. Muck: At some dry cleaning facilities, a mixture of powdered materials is used as the filter medium for the dry cleaning solvent, in lieu of the cartridge filter. This filter medium normally consists of diatomaceous earth and carbon. In addition to lint, soil, oil, and grease retained by this medium, between 40 and 50 percent by weight of the "muck" is absorbed solvent.
- 3. Still Residue: After filtration, the dry cleaning solvent is distilled by the dry cleaning machine to remove the dissolved materials from the used solvent. The dissolved materials (still residues) are in liquid form and consist of primarily detergent, oil and grease, vinyl acetate (a sizing compound), and 20 to 30 percent of solvent. This facility will ship about 80,000 gallons of dry cleaner wastes for reclamation annually.
- 4. Off specification perchloroethylene is generated by Safety-Kleen during the management of bulk perchloroethylene.

FRS WASTES

Eight solvents are collected from FRS waste users: mineral spirits; 1,1,1trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro-1,2,2trifluoroethane; lacquer thinners; and waste oil exhibiting a characteristic. Prior to accepting an FRS waste customer's waste for recycling, a sample is drawn and analyzed at Safety-Kleen's laboratory in Elgin, Illinois. The criteria used to determine whether a waste is acceptable for recycling are in Table II.A.5-1. The containers are not opened until they reach the recycle center. Samples of the waste collected at the recycle center



II.A.5-7

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TABLE II.A.5-1

ACCEPTANCE CRITERIA FOR FLUID RECOVERY SERVICE WASTES

- 1. Solvents suitable for recycling will include mineral spirits, methylene chloride, 1,1,1-trichloroethane, trichloroethylene, and perchloroethylene, or mixtures of these solvents. Freon TF (1,1,2-trichloroethane-1,2,2-trifluoroethene) and TMC (a mixture of Freon and methylene chloride) will be acceptable for recycling but must be authorized.
- 2. A minimum of 50% yield of usable solvent is necessary. Yield is to be calculated as a percentage of the total sample received. Chemical breakdown of distillate should also be reported since this affects whether the distillate can be suitably incorporated into the Safety-Kleen product line.
- 3. The <u>distillate</u> cannot contain more than 5% by volume of aromatic solvents (toluene + xylene).
- 4. The <u>distillate</u> cannot contain more than 1% oxygenated solvents. (This excludes the inhibitor packages which should be reported as inhibitors).
- 5. Freon contamination is limited to 1% by volume for chlorinated feedstocks. Materials containing methylene chloride and Freon should be noted as producing TMC.
- 6. The <u>raw material</u> cannot contain more than 50% water (free + emulsified). Solids content should not exceed 5% (by centrifuge) by volume.
- 7. Materials with more than 5% solid bottoms are not acceptable feedstocks for normal feed.
- 8. Materials which pose potential safety hazards are not acceptable, i.e. low flash point (less than 100°F), high toxicity, and those that pose explosive hazards during processing.
- 9. Materials which contain herbicides, pesticides, PCBs, and PBBs are not suitable feedstocks due to the potential for contamination of the processing equipment and facility.
- 10. Materials which contain more than 1% unknown are to be referred to Jim Breece or Clark Rose for a decision on further analysis or rejection, depending upon quantity.



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TABLE II.A.5-1 (Continued)

ACCEPTANCE CRITERIA FOR FLUID RECOVERY SERVICE WASTES

- 11. All sample analyses which are approved by the lab will be forwarded to Jim Breece or Clark Rose for their acceptance prior to authorizing the generator to ship material to a recycle center.
- 12. All sample analyses that are rejected by the lab will be forwarded to Industrial Solvents and Operations to resolve whether or not the material can be accepted under a special processing and pricing arrangement.



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wastes are either returned to the customer or properly disposed of. These wastes are shipped in containers and are stored on pallets. It is anticipated that 38,600 gallons of spent mineral spirits, 157,600 gallons of spent halogenated solvents and 60,400 gallons of spent lacquer thinners will be shipped from the accumulation center to a reclaimer on an annual basis.

ANTIFREEZE COLLECTION SERVICE

The spent antifreeze (ethylene glycol) is collected from automobile service stations. These wastes are deposited into 150-gallon translucent carboy by the customer, on the customer's premises, the carboy is pumped into containers or a 3,500-gallon tanker by the sales representative. It should be noted that the vast majority of the antifreeze sample analyses indicated this waste is not hazardous. However, due to the low concentrations at which contaminants render a waste hazardous under TCLP, the container storage area for spent antifreeze will, as a protective measure, be permitted to hold TCLP wastes.

PAINT WASTE COLLECTION

The paint wastes are collected from facilities where one process is managed and the possibility of cross-contamination from other chemicals or wastes is minimal. The contents of the containers are verified by the sales representative when he services the customer and, comparable to the handling of immersion cleaner, the containers are not reopened until they reach the recycle center.

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and paints. Both are characteristic wastes by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in a designated storage area. It is anticipated that this facility will ship 14,300 gallons of paint waste to a reclaimer annually.



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ATTACHMENT II.A.6

WASTE ANALYSIS PLAN

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

Hazardous Waste	Parameter ^a	Rationale	
1. Used Immersion Cleaner (609IC)	Methylene Chloride Orthodichlorobenzene Cresylic Acid	Formula contains these ingredients: F002 & Cresylic Acid F004	
2. Used Immersion Cleaner (699IC)	TCLP	May contain these compounds	
3. Used Mineral Spirits	Flash Point TCLP	Ignitable characteristics D001; may contain these compounds	
4. Mineral Spirits Tank Bottom Sludge and Free Water	TCLP Flash Point	The sludge and free water may contain these compounds and the sludge has a flash point of 105° F (D001)	
5. Mineral Spirits Dumpster Mud	TCLP Flash Point	The sludge and free water may contain these compounds and the sludge has a flash point of 105° F (D001)	
6. Dry Cleaning Wastes	Perchloroethylene Trichlorotrifluoroethane Mineral Spirits	Contain ingredient of F002 or contains a hazardous constituent. Ignitable characteristics D001	
7. Spent Antifreeze	TCLP	May contain these compounds	
8. Paint Waste	Toluene, xylene, methyl ethyl ketone, methyl isobutyl ketone,, acetone, isopropanol, methanol, ethanol, normal butyl acetate, isobutyl acetate, cadmium, chromium, lead TCLP	Contains these components: F003 and F005. Ignitable characteristics D001	
9. Fluid Recovery Service Wastes	Volatile Organic Compounds TCLP	Contains D001, F001, F002, F003, and F005 listed components; may contain these compounds.	
10. Off Specification Perchloroethylene	None	Pure compound with minor impurities	

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

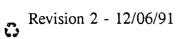




TABLE II.A.6-2

PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference
pH	pH Meter	ASTM Standard D1293-65
Flash Point	Tag closed cup tester	ASTM Standard D56-79
TCLP	Toxicity Characteristic Leaching Procedure	40 CFR 261, Appendix II
Hydrocarbons and Volatile Organics	Gas Chromatography (GC)	Modified Methods Based on "Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods," SW-846, USEPA and ASTM Standards
Boiling Range	Distillation of Petroleum	ASTM Method D86-78
API Gravity	Hydrometer Method	ASTM Standard D287-67



TABLE II.A.6-3

Hazardous Waste	Reference for Sampling	Sampler	Description of Sampling Method
1. Used Immersion Cleaner	Sampling a drum "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Test Methods for the Evaluation of Solid Waste Physical/ Chemical Methods, SW-846, USEPA	Representative composite sample using drum sampler
2. Used Mineral Spirits	Sampling a tank "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Same as 1	For tanksBomb sampler (similar to weighted bottle sampler)
3. Mineral Spirits, Tank Bottom Sludge, and Free Water	Same as 2	Same as 1	Same as 2
4. Mineral Spirits Dumpster Mud	Same as 1	Same as 1	Same as 1
5. Dry Cleaning Wastes	Same as 1	Same as 1	Same as 1
6. Spent Antifreeze	Same as 1 or 2	Same as 1	Same as 1 or 2
7. Paint Waste	Same as 1	Same as 1	Same as 1
8. Fluid Recovery Service Wastes	Same as 1	Same as 1	Same as 1
9. Off Specification Perchloroethylene	Same as 1	Same as 1	Same as 1

METHODS USED TO SAMPLE HAZARDOUS WASTES



TABLE II.A.6-4

FREQUENCY OF ANALYSIS

Hazardous Waste	Frequency ^a	
1. Used Immersion Cleaner 609	Gas chromatograph annually TCLP every five years	
2. Used Immersion Cleaner 699	Gas chromatograph annually TCLP every five years	
3. Used Mineral Spirits	Gas chromatograph annually Flash point annually	
4. Mineral Spirits, Tank Bottom Sludge, and Free Water	Gas chromatograph annually TCLP every five years	
5. Mineral Spirits Dumpster Mud	Gas chromatograph annually TCLP every five years	
6. Dry Cleaning Wastes	Gas chromatograph annually TCLP every five years	
7. Spent Antifreeze	Gas chromatograph annually TCLP every five years	
8. Paint Waste	Gas chromatograph annually TCLP every five years	
9. Fluid Recovery Service Wastes	Gas chromatograph annually TCLP every five years	
10. Off Specification Perchloroethylene	None	

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

PART II B

CONTAINERS



ATTACHMENT II.B.1

CONTAINMENT SYSTEM



ATTACHMENT II.B.1 CONTAINMENT SYSTEM

CONTAINMENT

The indoor container storage area shown in Figure II.B.1-1, occupies a portion of the building area which has a sloped concrete floor and a collection trench to form a spill containment system. The capacity of the containment system is designed to be greater than ten percent of the total liquid storage capacity.

The containment area is free of cracks and has been coated with a concrete sealant, Sikagard[®] 62 and was recoated with Semstone[®] 245. As stated by the manufacturer, Semstone[®] 245 is compatible with and resistant to products handled by Safety-Kleen. The manufacturer's statement and information regarding these products are provided in Sub-Attachment II.B.1-1 and Sub-Attachment II.B.1-3.

The containment volume is composed of the sloped concrete floor and the collection trench. As illustrated in Sub-Attachment II.B.1-2, the total containment volume is 2,972 gallons. Therefore, the maximum storage capacity is 29,720 gallons. The types and number of each container may vary; however, the total volume of product and waste stored will never exceed the maximum volume of 29,720 gallons. The estimated maximum storage volume of waste is 6,912 gallons.

Spills are removed by a hand-held, portable electric pump (the COMS pump), wet/dry vacuum cleaner, or sorbent material. Product collected in the collection trench is pumped into a safe container for transport to the recycle facility for reclamation. Only in the event that the spill were to exceed the containment capacity would spilled wastes be able to extend beyond the containment area. Only six openings (doorways) exist in the container containment area. Four of these lead to other containment areas; the container fill/return and the enclosed concrete dock (Figure II.B.1-1). The other two doorways are located on the east side of the container containment area behind a locked



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chain link fence. All openings are normally closed and locked. Due to the volume of containment available and the configuration of the container containment area, it is highly unlikely that any spill would extend beyond this area. The complete containment assessment is provided in Sub-Attachment II.B.1-2.

Since the characteristics of the stored wastes are known, analyses are not performed on the materials collected from the containment area. All collected materials are sent to a recycle facility for recycling/reclamation. Recovered materials that cannot be effectively reclaimed at the recycle facility will be, in turn, sent to a permitted facility for disposal.

CONTAINER MOVEMENT

In the container storage area, containers are handled with a hand-truck that is free of sharp points and stacked by hand. Every time a container is moved, a chance exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, containers 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 container. 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 container loading/unloading. With the exception of mineral spirits, all containerized wastes are loaded/unloaded in the vicinity of the garage door on the southern side of the building. The mineral spirits are loaded/unloaded at the fill/return shelter, which are described in the Tank Section, Part IIC.

All containers are transported, moved, and stored carefully in an upright position. The route trucks are equipped with an electric hoist to assist loading/unloading. In the warehouse area, the immersion cleaner, mineral spirits dumpster mud containers, dry cleaning waste, paint waste, and FRS waste containers are moved with two-wheel hand trucks and stacked by hand. All containers will be elevated on pallets to eliminate the possibility of them standing in spilled solvent.



II.B.1-2

Containers will be double-stacked. The containers will be arranged so that a two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling. Since all materials handled by Safety-Kleen are compatible with one another, no specific areas have been designated for specific wastes. Wastes will be grouped by type and are distinguishable by the color of the container; however, since the actual volume present of any product at a given time varies greatly, it is not practical to assign specific locations to given wastes.



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JUN 20 191 11:06 FROM SK MANIFEST

TO 18136218504

205 6970672

SEMISTONE[®] 245

High Performance Coating

PAGE, 002

TECHNICAL BULLETIN

JUN 20 191 11:41

DESCRIPTION AND USES:

SEMSTONE 245 is a high performance specialty coating for concrete. Its unique formulation makes it suitable for constant immersion service in chlorinated solvents, such as:

FROM SK ATLANTA REGIONAL

- Methylene chloride
- Ethylene dichloride
- Trichlordethylene

In addition, SEMSTONE 245 offers excellent resistance to a very broad range of other hazardous and corrosive chemicals including benzane, phenol, ketones, bicohols and chromic acid, as well as such commonly encountered items as 98% sulfuric acid and 50% caustic. This makes it the preferred choice for protecting hazardous waste handling facilities and other areas that will regularly see exposure to a wide veriety of difficult chemicals.

Other features include:

- Very rapid cure, providing quick turnaround of projects.
- Can be applied at temperatures as low as 35°F.
- Can be applied over damp concrete.

PACKAGING/COVERAGE:

SEMSTONE 245 is available in 1 gallon, 3 gallon and 25 gallon units. Each unit consists of pramassured Part A and Part B components. A bagged Part C thizotropic agent is added for work on vertical surfaces.

Application thickness may very from 25 mils to 125 mils, depending on expected service conditions (i.e., chemical exposure, temperature, traffic load and other mechanical abuse, immersion service vs. splash-split, etc.). Consult Sentry Polymers for specific thickness recommendations.

In addition, coverage rates will be effected by the condition of surface being coated (degraded vs. smooth, steel vs. concrete, etc.).

To figure THEORETICAL coverage per gallon, divide desired mill thickness into 1.604. (For example, theoretical coverage for a 50 mill thickness is: 1.504 divided by 60 = 26.73 square feet per gallon.)

For practical coverage, make necessary ellowances for condition of the substrate, working conclutions, waste, spillage, etc.



7. 0. 904 20754 8600 E XWY 222 FREEXXI, T2 77341

+0702221/2544

JUN 20 '31 11:42 FROM SK ATLANTA REGIONAL 4 FAGE.004 SENI 87: ; 5-17-91; 8:12 ; 4092334922- 3136213504;#10

CHEMICAL RESISTANCE QUIDE

This guide is intended as an aid in determining the potential usefultiess of SEMSTONE 245 as a protective barrier against chemical support. Each application should be evaluated according to its particular directionationes and conditions.

KEY: 1 = Suitable for constant immersion

2 - Suitable for shorter term containment and continuel spillage

- 3 = Suitable for Intermittent spills when followed promptly with water flushing
- NR Not recommended

JUN 20 TEL LL:DE FROM SK MANIFEET

C = Consult Sentry Polymers

• = This chemical will attack the silica accregate in the system. When the system is applied, be accacially careful that all secregate is totally anceculated with SEMSTONE 245.

TO 18136218504

FAGE.000 1205

•. •

** » For constant immersion service, costing must be postcured 12 hours at 150°F.

••• = Coating may show some staining of color change when exposed to this chemical.

			•.		
	RATING		FAIING		RATING
			2	Naphchalena	•
Acatic Acid, 10%	÷	Cyclohexane	2		2
Acatic Acid, 30%	2	Cycionexand	-	NICK Acts, 53	3
Acatic Acid. Glacici	3	Cycianauanone	· 🖌	Nitria Acid, 30%	-
Accione	1	Classi Fusi	1	Nitrie Acid, 50%	88
Activite Acid, up to 25-35	2	Ciainyi Benzana	1	Nirobenzene	•
Acrylonivile	2	Dimethyl Aniline	1	n-Cetyl Aleshol	1
Adipic Acid	2	Epichlorohydrin	1 .	Cits .	1
Aum (Aiuminum Potasaium	Sulfate) 1	Ethyl Acatala	1	Ctelc Acid	2
Aluminum Chioride	1	Ethyl Acrylate	1	Olaum	2
Aluminum Flucida	· •	Estivi Alcohol	1	Casile Acid	- 7
	* .	Ethyl Senzene	1	Perchloroethylene	-
Aluminum Hydroxida	÷	Ethyl Chlarida	11-	Perchlaric Acid	:
Aluminum Nitrate	<u> </u>	Ethylene Dichlaride (EDC)	1.	Phagel	
Aluminum Sulfate	1		-		4
Ammonia	2	Ethylene Glycol	1	Phosphoric Acid. 50%	1
Ammonium Blauifita	1	Fetty Acids	1	Phosphoric Acid, 85%	:
Ammonium Chioride	. 1	Ferric Chloride	· • • • • • • • • • • • • • • • • • • •	Phosphorous Acid	2
Ammonhum Hydroxide	1	Ferrio Nivate	1	Potassium Carbonate	
Ammonium Nitrata	1	Ferrie Sultate	1	Potassium Chieride	1
Ammonium Sulfate	-	Ferrous Chloride	1 -	Patasaium Dichromets	2
	1	Flugsfilcic Acid		Potassium Hydroxide	1
n Arryl Alcohol	1	Formaldahyde	1	Polassium Nitrats	
Antine		Formic Acid	2	Prepionic Acid	5
Barium Chiorlde	-1	•••••••••••••••••••••••••••••••••••••••	1		1 • • -
Bartum Hydroxide	1	Fuel Oil	-	Silver Nitrate	1
Borham Sulface	1	Gazalino	•	Skydrot	
Barjum Sulfice	1	Gycerine		- Sodium Acetate	2
Benzano	1	Heptene	1	Sodium Bicarbonata	1
Benzene Suitonic Acid	1	Нахала	· 1	Socium Blavilate	1
Bonzoic Acid	:	Hydrobromic Acid	2	Sodium Blautita	:
Black Equor, Fulp Mill		Hydrochiaric Acid. 15%	1	Socium Carbonate	1
	ć	Hydrochloric Acid. 37%	2	Sodium Chicrice	1
Bleach	4	Hydroniuorle Acid	1.	Sedlum Chlorita	2
Borla Acid	÷.	Hydrogen Percuide	1	Sodium Hydroxide, 10%	
Bdne	7		4		÷.
Bromide, Liquid	NR	Hydrogen Sulfide	. 1	Sodium Hydroxide, 5075	1
Bromide Cas (Dry & Wel)	3	Isopropyi Alcohol	1	Scalum Hypochlanta	ç
Butyl Acetsta	-	Jat Fuel	1	Sockum Sulfata	:
Butyl Acriteta	1	Kerosone	1	Socium Sullice	1
n-Butyl Alconol	1	Locia Add	2	Slannic Chloride	1
Buty Callosolve Solvent	1	Laury Chloride	1	Stannous Chicride	1
n-Burrie Acid	2	Land Acatata	1	Stearic Acid	:
		Uncood Cil	1	Sprene	:
CSCMOM CHORES -		Lithium Bromide	•	Sugar/Sucrase	4
Calcium Chloride	-		·	Suiter Diexies	-
Calcium Hydroxide	ċ	Linium Hypochionie	-	Sulturic Acid. 10%	-
Calcium Hypochlarita	Ċ.				-
Galeium Nitrota	:	Lithaim Hydroalde	-	Suttoric Acts. 50%	-
Celeium Sulface	1	Magnesium Bisuifite	1	Sultare Acts, 98%	
Calcium Sulfite	:	Magnesium Carponata	, 1	Tae Cr	:
Carbon Dioxide Gas	<u>-</u>	Magnesium Chioride	1	Tanno Add	1
Carbon Disevilian	2	Magnesium Hydroxide	1	Tartario Acid	:
Carbon Tatrachianda		Mornoaium Suitate	:	Tetrahydroluran	3
Chlorice Diaude		Moheic Acid	2	Totrona	1
Chierine Gas (Dry & Wot)	Ę	Mercuric Chiorice	1	Tarvene Surrania Acia	•
	-	Marcurous Chionde		Trienterarestic Acid	2
Chierine Water		Methanol		Trobleroethane	-
Chioropenzono	1	Methyl Chloride	2	Trendersethviene	
Chieroform	· · · ·	Marrylane Chierico	1	Trisocium Prosphata	-
Chromie Acid. 25%	2		1	Unaa	:
Chromic Acid, 50%	2	Motry Eury Xstone	1	Water, D oi cnized	-
Copper Nitrate	-	Misthyl Mothacrylate	Å .		<u>-</u>
Copper Suitsta	-	Minoral Somus	1	Sezimenimod, NateW	-
Com Cit	:	bby altereasticsonom		Water Claulled	-
Crade Cil, Sour	:	Monorthanoismine	4	Idene	-
Crude Cil, Sweet	:	Muderic Acid	1	Zine Chlorida	:
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APPLICATION GUIDELINES

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IMPORTANT NOTES

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- 1. Work on vertical surfaces requires the addition of Part C thixotrope.
- For manual applications, use only 1 gallon and 3 gallon units. The mixed material has a very short pot life, so plan your work accordingly.

TEMPERATURE CONSIDERATIONS

- Throughout the application process, the temperature of the surface to be coated should be 35⁴F -95⁴F.
- 2. Below 75°F, the components will thicken noticeably, making manual applications extremely difficult.
- When coeting steel, halt application if the temperature fails within 5°F of the dew point. (This is not necessary when coating concrete.)
- 4. Eublies may sppear in the SEMSTONE 245 coating If it is applied over concrete in direct sunlight, or when temperatures are using. This is due to the expansion of air and/or molsture trapped in the concrete. It is especially true of air entrained concrete.

For best results, shade the work area and apply SEMSTONE 245 when temperatures are falling.

5. Store all materials (components A, B, C and aggregate) at 80°F - 90°F for at least 24 hours before use, to facilitate handling.

SURFACE PREPARATION . GENERAL

 Surfaces must be free of dirt, cust, cill grease, chemicals and other contaminants immediately prior to applying each coat of SEMSTONE 245.

For the leftlel cost, concrete surfaces can be damp.

However, for recoats, all surfaced must be dry.

SURFACE PREPARATION OF CONCRETE

 New concrete generally should be cured a minimum of 28 days.

NOTE: Check with Sentry Polymers for recommendations regarding concrete cured less than 28 days.

- 2. Concrete must be structurally sound and must not contain any accelerators or curing compounds.
- 3. Remove all oil and grease.
- 4. Remove all surface laitanca and expose sound concrete. We recommend abrasive blasting to do this.

However, other methods, such as acid etching and neutralizing, may be used.

In general, any existing coating should be completely removed.

In certain instances, this may not be necessary, but consult with Sentry Polymers first.

Always remove coatings which have failed due to lack of adhesion or thermal shock.

- Locate all expansion joints, control joints, floor draina, equipment base plates and mid-floor termination points. Handle them as per Sentry's Construction Details.
- Honeycombs or any form voids in vertical surfaces must be filled.

Above 50°F, use SEMSTONE 140 with Part C. Wixeurope and aggragate edded.

Below 5017, use SEMSTONE 140-CT with Fam C. aggregate added.

8. If the concrete is damp:

a. Flush thoroughly with clear water. Steam or not water is recommended, if available.

b. Remove all standing water.

SURFACE PREPARATION OF STEEL (NON-IMMERSION SERVICE ONLY)

- Abrasive blast steel surfaces to a near white metal finish with 1 - 2 mil anchor profile. (Ref. SSPC-SP-10)
- All outside corners must be ground smooth and rounded.
- Round all Inside corners to a minimum 1/2* radius with SEMSTONE 500 Epoxy Putty.

MASKING

Mask surfaces that are not to be coated. This material is difficult to remove, once applied.

APPLICATION EQUIPMENT

- 1. For spraying, use only a specially equipped plural component rig. Specifications are as follows:
 - Greco King Hydracat (or equivalent); 28:1 pump; 2.3 GPM, 4:1 mix ratio; injet air pressure on pump set at 75-120 psi.

Two 15 gallon heated hopper tanks. Set heater at 95°F.

In-line heater on resin outlet, set at 110° F.

High pressure solvent pump.

Insulated hoses, 3/8 in, ID, meximum length of 100 ft.

Grace Silver Gun, or equivalent, equipped with a reversible, self-cleaning Up, orifice size .035 - .041 inches.

No filters or internal screens.

- 2. For manual applications:
 - Foors preferred method is to spread with servated squeegee, then backroll.

As a second choice, trowel or brush could be used.

b. Walls - use roller or brush.

MIXING AND APPLICATION

- 1. The components must be incluidually agitated immediately prior to use:
 - Part A Blend each Part A component to a uniform consistency in its individual container, using a Jiffy type mixer.
 - Part B Stir each Part S component to a uniform color in its individual container.
- 2. For work on vertical surfaces, add Part C.

Part C comes in premeasured bags.

For a one gallon unit and three gallon units, add one premeasured beg to each Part A.

For 25 gallon units, add one premeasured bag to each bucket of Part A and each bucket of Part B. (NOTE-There are 4 buckets of Part A and one bucket of Part B in a 25-gallon unit.)

Using a Jiffy type mixer, blend the Part C In until it is evenly dispersed, (about 1 - 2 minutes).

NOTE: Adding Part C darkens the color of SEMSTONE 245 somewhat

3. Skip this step if you are spraying.

If mixing for application by hand:

Pour Part A into a clean mixing container of adequate capacity.

Add Part B.

Mix theroughly for two minutes using a Jiffy type mixer,

The pot life of the mixed material will be accut 15 minutes at 50°F. So, use immediately. For work on floors, etc., we suggest that you immediately dump the mixed material onto the surface and spread it.

NOTE: The premeasured quantities of each component have been carefully set. Any variation in these promeasured ratios will edversely effect performance. So, mix only complete units. If any of the components are spilled, discard the baton.

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PAGE 207

. Material should be applied in even coats.

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If spraying, use multidirectional passes to insure positive coverage and a proper film build.

If you notice a marbling or streaking effect while spraying, stop immediately. The spray equipment is not mixing the material properly or the mix ratios are incorrect. Check your equipment.

This marcied or streaked matarial will not cure properly and must be removed. Scrace the material off and then solvent wash the area with MEK or toluene. Alternately, abrasive blasting may be used to remove the material. In either case the end result is to have a non-sticky surface to recoat.

- 5. Adding aggregate:
 - a. Horizontal surfaces

To obtain a thicker coating and/or a nonskid finish, aggregate may be broadcast into the coating before it begins to set.

Since SEMSTONE 245 sets quickly, you must plan the work carefully. One worker should apply the coating, and another should follow immediately, broadcasting the aggregate. However, keep the work separated. Do not allow aggregate to be broadcast ahead of the applicator.

Ercadcast aggregate until dry layer is achieved.

Allow the coating to cure.

Remove the excess aggregate.

Use only clean, dry, bagged and weil graded 20/40 mesh silica or quark sand containing not less than 97.5% silicon dioxide. Aggregate may be either round or angular.

When broaccasting aggregate in a large or congested area, it may be desirable for workers to wear spiked shoos to anable them to waik out onto the costing without disturbing it.

An optional topcoat of SEMSTONE 245 may be copiled to protect the aggregate and option a more clashable surface. The topcoat should be of neat material applied at a cover rate of 150-160 sq. ft. per gallon. The surface must be kept dry and free of contamination prior to applying this topcoat.

b. Vertical surfaces

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Refer to Santry's supplemental guidelines for adding Part C and sand.

- 6. Prepare surfaces for intercoat adhesion as follows:
 - a. Allow SEMSTONE 245 to cure until Jailed before recoating.
 - b. If the surface has cured firm to the touch, but less than 24 hours, it must be washed with soap and water, rinsed and dried before recosting.
 - Surfaces cured beyond 24 hours must be washed with soap and water, rinsed, dried and lightly sanded or abrasive blasted.
 - Important: While SEMSTONE 245 can be applied over damp concrete, for receating, the surface
 must be dry.
 - 7. Post-curing for immersion service in chlorinated solvents:

The coating must be postcured if it will be used for continuous immersion service in chlorinated solvents.

Tarp the costed area and heat it at 150°F for at least 12 hours.

8. Spark Testing Steel

Spark testing is recommended for coated steel in immersion service.

Voltage setting = 1250 x V Coating Thickness (in mils)

 If work is interructed, and at the end of the day, terminate the coating in a straight line.

CLEANUP

Clean all tools and equipment with Xylene, MEK or toluene.

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SAFETY PRECAUTIONS

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FOR INDUSTRIAL USE ONLY.

Soth the mixed product and its separate A and B components can be extremely irritating to skin, eyes and the respiratory system.

Avoid contact with eyes and skin; do not ingest or inhale.

When spraying in a confined area, wear a frash air hood and make provision for forced ventilation.

NOTES:

At all other times, wear a NIOSH approved respirator suitable for organic vapors when working with this product or its components.

When working with SEMSTONE 245, always wear chemical gogglas, rubber gloves, and appropriate work clothing.

Prolonged or repeated exposure to the unreacted Part A and Part B components of SEMSTONE 245 may cause skin irritation or allergic reactions.

Refer to material safety data sneets regarding individual components. JUN 22 '91 11:44

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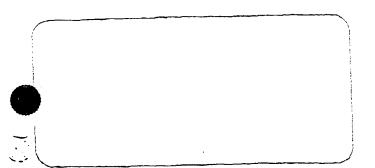
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NOTICE TO CUSTOMERS

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TYPICAL PROPERTIES:

Solida, by Volume	100%
Color	Buff (Selected other colors optional)
Weight per Mixed Gailon	10 ;bs.

Cure Times (Approximate):

Temperature	Foot Traffic	Chemical Service	
35°F	24 hrs.	7 days	
5315	8 hrs.	43 hrs.	
80°F	4 675.	24 hrs.	

"For Immersion service in chloringted solvents, the coating must be postcured at 150°F for 12 hours.

RELATED AND ANCILLARY PRODUCTS:

SEMSTONE 140 Epoxy Floor Topping SEMSTONE 140-CT Epoxy Floor Coating - Cold Temperature Formulation SEMSTONE 140-S Epoxy Coating and Lining SEMSTONE 300 Epoxy Polymer Concrete SEMSTONE 500 Epoxy Putty SEM-CRETE Rapid Hardening Underlayment Mortar

Refer to separate technical bulletin on each products for its uses, application instructions, etc.

STORAGE AND SHELF LIFE:

Keep SEMSTONE 24S components tightly sealed in their original containers until ready for use. Store unopened at 50°F-90°F, out of direct sunlight. At least 24 hours immediately prior to use, store all components (A, B, C, and aggregate) at 80°F-90°F, to facilitate handling.

Properly stored, SEMSTONE 245 has a minimum shelf life of one year. Refer to batch number on label for date of manufacture.

SEMSTONE 245 + Paga 2

ATTACHMENT II.B.3

WASTE SEGREGATION



ATTACHMENT II.B.3 WASTE SEGREGATION

PROCEDURE FOR SEGREGATING WASTE TYPES

The used solvents are compatible with each other and with other materials handled at this facility with respect to reactivity and therefore do not require special segregation procedures. However, the wastes are the primary source of feed stock for regenerating the clean solvents. For ease of inventory control and product integrity, separation and grouping of both used and unused solvents is a standard practice at the facility. Safety-Kleen uses a container color scheme as a part of its waste management system. Eighty-five-gallon overpack containers are used to manage containers whose integrity have been compromised.

All materials are managed in accordance with the local fire protection code and fire department recommendations.

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

The dry cleaning wastes are contained in containers. The liquids are in polyethylene or steel containers. Filters are in steel containers. These containers are managed similarly to the used immersion cleaner containers, and contents within the containers will not be removed or processed at the facility.

The mineral spirits are collected in containers. These containers are then emptied into the dumpsters in the return/fill shelter. Spent antifreeze is packaged in containers.



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Paint wastes are stored in containers. The contents within these containers will not be transferred or processed at the service center. The paint waste is not removed from the containers until receipt by a reclaimer.

Eight solvents are collected from FRS waste users: mineral spirits; 1,1,1trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro-1,2,2trifluoroethane; lacquer thinners, and waste oil exhibiting a characteristic. These wastes, except waste oil, are shipped in containers and are stored on pallets. It is anticipated that 38,600 gallons of spent mineral spirits, 157,600 gallons of spent halogenated solvents, and 60,400 gallons of spent lacquer thinners will be shipped from the accumulation center to a reclaimer on an annual basis.

The 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. Figures II.B.3-1 through II.B.3-4 show typical detailed construction specifications of the 16-gallon containers. The containers used to store cleaning wastes are shown in Figures II.B.3-5 through II.B.3-7. Paint containers are shown in Figure II.B.3-8.

Wastes are stored in polyethylene and steel containers. Since none of the waste handled by Safety-Kleen reacts with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste containers are never opened at the branch, and none of the wastes are incompatible.

POTENTIAL FIRE SOURCES

The following is a list of fire prevention and minimization measures:

1. <u>All wastes and products are kept away from ignitable sources</u>--Personnel must confine smoking and open flames to remote areas (e.g., the office or locker room),



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separate from any solvent. The mineral spirits handling area and the aboveground storage tanks are separate from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

- 2. Ignitable wastes are handled so that they do not:
 - a. <u>become subject to extreme heat or pressure</u>, fire or explosion, or a <u>violent reaction</u>--The mineral spirits waste is 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.
 - b. <u>produce uncontrolled toxic mists, fumes, dusts or gases in quantities</u> <u>sufficient to threaten human health</u>--The vapor pressure of mineral spirits is low (2 mm) and it is reactive with strong oxidizers 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.
 - c. <u>produce uncontrolled fires or gases in quantities sufficient to pose a risk</u> of fire or explosion--See "a" above and "d" below.
 - d. <u>damage the structural integrity of the Safety-Kleen facility</u>--The solvents stored at this facility will not cause deterioration of the tank, containers, or other structural components of the facility.
- 3. <u>Adequate aisle space is maintained</u> to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.



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- 4. "NO SMOKING" signs are posted in areas where solvents are handled or stored.
- 5. <u>Fire extinguishers must be checked</u> once per week and tested by the fire extinguisher company once per year.

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 container storage area is in a building which is inaccessible to unauthorized personnel.

- <u>Vandalism</u>--Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.
- 2. <u>Strikes</u>--A strike would not result in a solvent spill or fire.
- 3. <u>Power failure</u>--A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.
- 4. <u>Flooding</u>--The site elevation is above the projected 100-year floodplain.
- 5. <u>Storms or Cold Weather</u>--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.



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ATTACHMENT II.B.4

CONTAINER MANAGEMENT



ATTACHMENT II.B.4 CONTAINER MANAGEMENT

The immersion cleaner is always contained in partially filled, covered containers before, during, and after it use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the facility and stored in the designated container storage areas before shipment to the recycle facility.

The dry cleaning wastes are contained in containers. The perchloroethylene from dry cleaning operations is collected in polyethylene containers. The dry cleaning filters are in steel containers. These containers are managed similarly to the used immersion cleaner containers, and contents within the containers will not be removed or processed at the facility.

The spent antifreeze is packaged in containers, and the containers are not opened at the facility. The mineral spirits are collected in containers which are poured into the dumpsters. Paint wastes are stored in containers. The contents within these containers will not be transferred or processed at the service center. The paint waste is not removed from the containers until receipt by an offsite reclaimer.

The 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. Figures II.B.3-1 through II.B.3-4 showed typical detailed construction specifications of the 16-gallon immersion cleaner containers. The containers used to store dry cleaning wastes were shown in Figures II.B.3-5 through II.B.3-7. Paint waste containers were shown in Figure II.B.3-8. Table II.B.4-1 provides a list of the containers used at the facility.



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TABLE II.B.4-1

SAFETY-KLEEN CORP. WASTE STREAMS AND CONTAINER SIZES BOYNTON BEACH, FLORIDA

Waste Stream	Container Sizes (gallons)	Construction Material of Container
Mineral Spirits	5	Polyethylene
	16	Steel
	30	Steel
Dry Cleaner	5	Steel
(including off specification perchloroethylene)	13.5	Polyethylene
peremoroeuryrene)	15	Steel
	16	Polyethylene
	16	Steel
	Split 30 (also known as 20-gallon)	Steel
Immersion Cleaner	16	Steel
Paint Waste	5	Steel
	16	Steel
Ethylene Glycol	30	Steel
	55	Steel
Fluid Recovery	30	Steel
Service (FRS) Waste	55	Steel
Dumpster Mud/Tank Bottoms	16	Steel
	30	Steel
Overpack	85	Steel
	85	Polyethylene



Seven FRS wastes are collected from FRS waste users: mineral spirits; 1,1,1trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro-1,2,2trifluoroethane; lacquer thinners, and waste oil exhibiting a characteristic. These wastes, except waste oil, are shipped in containers and are stored on pallets.

Wastes are stored in polyethylene and steel containers. Since none of the wastes handled by Safety-Kleen react with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste containers are never opened at the branch, and none of the wastes are incompatible.

Containers will be double-stacked. The containers will be arranged so that a two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling. Since all materials handled by Safety-Kleen are compatible with one another, no specific areas have been designated for specific wastes. Wastes will be grouped by type and are distinguishable by the color of the container; however, since the actual volume present of any product at a given time varies greatly, it is not practical to assign specific locations to given wastes.



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ATTACHMENT II.B.6

CONTAINER CLOSURE PLAN



ATTACHMENT II.B.6 CONTAINER CLOSURE PLAN

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. Onsite disposal does not occur at any plant and hence there is no disposal capacity to be exhausted that will necessitate closure of a facility. Based on current business and facility conditions, this facility is expected to remain in operation beyond the year 2000.

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

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

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

An anticipated closure schedule can be seen in Figure II.B.6-1. An anticipated maximum waste inventory for the container storage portion of the facility is presented in the following section.



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FACILITY DATA

Container Storage Area:

The container storage area has a 48' x 78' area with a sloped floor and collection sump. The maximum total volume of product and waste stored is 29,720 gallons with 6,912 gallons anticipated to be containers of waste mineral spirits dumpster mud, dry cleaner wastes, antifreeze, paint waste, immersion cleaner, and/or FRS wastes.

MAXIMUM INVENTORY OF WASTE

Containerized Waste: Anticipated maximum of 6,912 gallons of waste.

This amount includes any combination of 5-, 15-, 16-, split 30- (also known as 20-gallon), 30-, 55-, and 85-gallon containers.

CLOSURE PROCEDURE

Container Storage Areas

The container storage area houses containers of used immersion cleaner, mineral spirits dumpster mud, dry cleaning wastes, antifreeze, paint waste, and FRS wastes.

- At closure all containers will be removed and transported to the recycle center with proper packaging, labeling, and manifesting where the contents in the containers will be reclaimed and the containers will be cleaned for reuse.
- The concrete floor and spill containment areas will be cleaned with detergent solution and the rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium using SW-846 methods to determine the effectiveness of decontamination. The area will continue to be washed and rinsed until levels are below maximum contaminant levels (MCLs), or if MCLs are not available, practical quantitation limits (PQLs) as specified in Appendix IX of 40 CFR 264.



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- If the wash water or other wastes generated in the closure 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 <u>not</u> be allowed to drain to the waterway. It is anticipated that approximately 350 gallons of rinsate will require RCRA disposal.
- The equipment 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 hose will be washed with a detergent solution to decontaminate it. The containers will be used to store the wastewater.

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 during which wastes are periodically received.) Safety-Kleen shall amend the plan any time changes in operating plans or facility design affect the closure plan or whenever there is a change in the expected year of closure of the facility. The plan must be amended within 60 days of the changes.
- Safety-Kleen shall notify the state authority at least 180 days prior to the date closure is expected to begin, except in cases where the facility's permit is terminated or if the facility is otherwise ordered by judicial decree or compliance order to cease receiving wastes or to close. The date when Safety-Kleen "expects to begin closure" should be within 90 days after the date on which Safety-Kleen expects to receive the final volume of wastes.
- Within 90 days of receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, Safety-Kleen shall remove from the site



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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

The following requirements are met:

- ▶ The facility has the capacity to receive additional wastes;
- There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
- Closure of the facility would be incompatible with continued operation of the site; and Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen shall complete closure activities in accordance with the approved closure plan and 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 will be properly disposed of, or decontaminated by removing all hazardous waste and residues.
- When closure is completed, Safety-Kleen shall submit to the Regional Administrator a certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.



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PART II C

TANK SYSTEMS



ATTACHMENT II.C.1

ENGINEERING ASSESSMENT OF TANK SYSTEM



TERA Report No. 91-208-1

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DESIGN AND INSTALLATION ASSESSMENTS USED ANTIFREEZE STORAGE TANK SYSTEM BOYNTON BEACH, FLORIDA

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For

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SAFETY-KLEEN CORP. Elgin, Illinois





6440 Hillcroft, Suite 200 P.O. Box 740038, Houston, Texas 77274, Tel. 713/772-0876, Fax: 713/981-7713

91-208-1

TANK SYSTEM CERTIFICATION

I have supervised the design and installation assessments dated November 21, 1991, of the used antifreeze storage tank systems at the Safety-Kleen Corp. facility in Boynton Beach, Florida. The EPA ID Number for this facility is: FLD984167791.

With regard to this duty, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all related attachments and that, based on my observations and my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

> Wendell R. Vines Registered Professional Engineer Florida No. 37464 TERA, Inc. P. O. Box 740038 Houston, Texas 77274

ANI HUMMINIA Signed: Date: OMA "Internetter



6440 Hillcroft, Suite 200 P.O. Box 740038, Houston, Texas 77274, Tel. 713/772-0876, Fax: 713/981-7713

> November 21, 1991 91-208-1

SAFETY-KLEEN CORP. 777 Big Timber Road Elgin, Illinois 60123

Attention: Ms. Melissa Hlebasko

Subject: Design and Installation Assessments Used Antifreeze Storage Tank System Boynton Beach, Florida

Dear Melissa:

Submitted here is our design and installation assessments report for the used antifreeze storage tank system at your Boynton Beach facility. The main report body summarizes assessment results in a format corresponding to the rules being addressed. Appendices are used for presenting detailed information.

We have enjoyed working with you on this interesting project, and look forward to another opportunity to be of service to Safety-Kleen. Please contact us at 713/772-0876 if you have any questions.

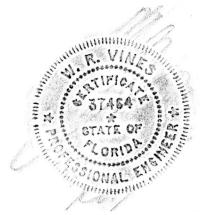
Very truly yours,

TERA, Inc.

Wendell R. Vines, P.E. President

WRV/lf

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91-208-1

DESIGN AND INSTALLATION ASSESSMENTS USED ANTIFREEZE STORAGE TANK SYSTEM BOYNTON BEACH, FLORIDA

* * *

For

SAFETY-KLEEN CORP. Elgin, Illinois

* * *

Ву

TERA, Inc. Houston, Texas

November 1991

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91-208-1

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This report documents the design and installation assessments for the used antifreeze storage tank system at the Safety-Kleen facility in Boynton Beach, Florida. The assessments described here are written to address the requirements of 40 CFR 264.192 and 40 CFR 264.193, and Florida DER Regulation 17-30.180.

SYSTEM DESCRIPTION

Used antifreeze liquids will be received from offsite generators in tank trucks. The hose from the truck is connected to a tanker hookup located in the secondary containment of the tank farm building. The truck pump transfers the used antifreeze via aboveground piping into an aboveground steel storage tank of 20,000-gallon capacity. Accumulated used antifreeze will be evacuated periodically from this tank via a tank truck pump through the aboveground piping to the tank truck for transport to an offsite recycling center. Sludge and solids that accumulate in the tank will be removed periodically through a manway for offsite disposal. All of the ancillary equipment for this system is located in the tank containment area.

For the purpose of this assessment, the used antifreeze storage system has been defined to include the storage tank, the aboveground piping, the ancillary equipment, and the secondary containment system for these components. The system was originally constructed as a used oil system and has been converted to a used antifreeze system before putting the system into service.

The 20,000-gallon storage tank for the used antifreeze is a horizontal tank with integral saddle supports. The tank is located inside a steel-reinforced concrete containment area which is coated for impermeability. The used antifreeze storage tank is vented to the

<u>SYSTEM DESCRIPTION</u> (Continued)

atmosphere. Exhault fans (32" x 32") are mounted at each end of the building for air circulation. Tank liquid level is to be monitored daily by reading a level indicator. The tank is also equipped with a high level alarm to provide a warning to service center personnel when the tank is approximately 95% full. Emergency venting is to be provided by a 24-inch loose-bolt manway on top of the tank.

Documents further describing the used antifreeze storage system are attached at Appendix A.

A local area map for Boynton Beach, Florida, and a site plan for the facility are shown on Plates 1 and 2. A Flood Map is shown on Plate 3. A schematic drawing of the used antifreeze storage tank system is shown on Plate 4.

CONSIDERATIONS OF DESIGN ASSESSMENT

1. Design Standards (40 CFR 264.192(a) and 40 CFR 264.193))

Design standards and materials of construction were determined from construction drawings for the system. Information made available for this purpose is listed in Appendix A.

This tank system design has been reviewed for compliance with the following applicable codes:

- Underwriters' Laboratory, UL 142, Standard for Steel
 Aboveground Tanks for Flammable and Combustible Liquids,
 6th Ed. (tank)
- American Concrete Institute, ACI 318-89, Building Code Requirements for Reinforced Concrete (containment)

CONSIDERATIONS OF DESIGN ASSESSMENT (Continued)

- 1. <u>Design Standards</u> (40 CFR 264.192(a) and 40 CFR 264.193)) (Continued)
 - American Society of Civil Engineers, ASCE 7-88, Minimum Design Loads for Buildings and Other Structures, (Formerly ANSI A58.1) (tank environmental response analyses).

Calculations, discussions and checklists which evaluate compliance with these codes for primary considerations are given in Appendix B. The design review shows that:

- The design substantially conforms to the standards referenced above;
- The design standards are appropriate for this application.

Descriptions of the concrete coating and caulking materials and application procedures used by Safety-Kleen for the tank secondary containment are referenced in Appendix A. This information indicates that the materials should be satisfactory for the intended service, provided recommended procedures were followed by the applicator.

The conclusion upon review of the documents is that the design of the used antifreeze storage tank system is appropriate for the intended service. The structural system, support, and seams appear to be adequately designed.

<u>Hazardous Characteristics of the Waste</u> (40 CFR 264.192(a)(2) and
 40 CFR 264.193)

The waste material to be collected and stored by this system will be antifreeze liquids which consist primarily of ethylene

CONSIDERATIONS OF DESIGN ASSESSMENT (Continued)

2. <u>Hazardous Characteristics of the Waste</u> (40 CFR 264.192(a)(2) and 40 CFR 264.193) (Continued)

glycol and water picked up in various automotive service centers and commercial users. The material is a single-phase liquid at ambient temperatures. Documentation describing the waste material is included in Appendix C.

The primary hazardous characteristic of the waste is toxicity by characteristic leaching procedure standards (D004-D011, D018, D019, D021-D030, D032-D043), EPA Hazard Code E.

3. <u>Corrosion Protection</u> (40 CFR 264.192(a)(3))

The steel tank, protected with a paint coating on its exterior, is inside a building. All associated piping is also painted and inside the building.

System components are not provided with internal corrosion protection.

A literature search by TERA for test data which confirms compatibility of the waste antifreeze and water mixture with the carbon steel elements of this tank storage system has not been fruitful. However, due to the usual presence of rust inhibitors in manufactured antifreeze and the world-wide use of antifreeze mixed with water as a coolant for internal combustion engines, there is ample reason to believe that the used antifreeze stored in this tank system is not corrosive to steel alloys.

<u>CONSIDERATIONS OF DESIGN ASSESSMENT</u> (Continued)

3. <u>Corrosion Protection</u> (40 CFR 264.192(a)(3)) (Continued)

Safety-Kleen states that they have been intensively investigating all aspects of the marketing, handling, and storage of used antifreeze for the past three years. The company reportedly has conducted extensive chemical analyses of the various compo-sitions of used antifreeze expected to be stored in this system and has evaluated the compatibility of used antifreeze with the usual materials of construction normally employed for a hazardous waste storage system at their service centers. Safety-Kleen has determined that used antifreeze is compatible with those materials without the need for special liners or other protection against internal corrosion. A letter from Safety-Kleen is included in Appendix C.

External metal components of this tank system are not in long-term contact with soil or water. Therefore, the tank system will not require cathodic protection.

It is therefore concluded that the used antifreeze waste materials are sufficiently compatible with the system materials of construction to not require additional corrosion protection.

4. <u>Effects of Vehicular Traffic</u> (40 CFR 264.192(a)(4))

No underground components are used in this system, and no adverse effects from vehicular traffic under normal conditions have been identified.

CONSIDERATIONS OF DESIGN ASSESSMENT (Continued)

5. <u>Foundation Design</u> (40 CFR 264.192(a)(5))

The foundation support for the used antifreeze storage tank is provided by a reinforced concrete slab. As shown in the calculations included in Appendix B, the foundation design for the new tank components appears to be sufficient to maintain a full liquid load. The branch site is in a zone of low seismic activity (Zone 0 from ASCE 7-88) and the tank will not require special anchorage for earthquakes. See Appendix B for seismic calculations. Wind forces on the tank are not expected since the system is inside a building.

6. <u>Tank Installation Assessment</u> (40 CFR 264.192)

A. <u>Installation Inspection</u>

After installation and prior to being placed in service, the new tank system was inspected by TERA for defects and compliance with the design documentation. No discrepancies were identified between design documentation and observed features of the tank system. No indications were found of any weld breaks, punctures, scrapes of protective coatings, structural inadequate cracks, corrosion, damage or construction or installation. The tank and piping wall thicknesses were also verified by ultrasonic thickness measurements. Documentation of the inspections performed is included in Appendix D of this report.

B. <u>Tightness Testing</u>

The new tank system components were tested for tightness prior to being placed in service. Tightness testing consisted of pneumatic leak testing of the tank and system piping.

CONSIDERATIONS OF DESIGN ASSESSMENT (Continued)

- 6. <u>Tank Installation Assessment</u> (40 CFR 264.192) (Continued)
 - B. <u>Tightness Testing</u> (Continued)

Documentation of the testing performed is included in Appendix D. There was reportedly no evidence of leakage from any of the system components during final tightness testing.

SECONDARY CONTAINMENT ASSESSMENT

The following paragraphs give a detailed comparison of containment system features to current requirements. This evaluation considers only the used antifreeze tank system containment area. For brevity, "secondary containment" as used here means features that meet the requirements of 40 CFR 264.193.

1. <u>Required Date</u> (40 CFR 264.193(a)(3))

Since this system is new, secondary containment is required prior to placing the tank system in service. As discussed in subsequent paragraphs, secondary containment has been provided.

2. <u>Materials Compatibility</u> (40 CFR 264.193(c)(1))

The waste material collected and stored by the system is to be a used antifreeze liquid which consists primarily of ethylene glycol and water received from various automotive service operations and commercial users. The primary hazardous characteristic of the waste is toxicity. As noted earlier, this material is compatible with and not corrosive to the system materials of construction (primarily concrete, polyurethane caulking, epoxy coating and carbon steel).

SECONDARY CONTAINMENT ASSESSMENT (Continued)

3. <u>Strength</u> (40 CFR 264.193(c)(1))

The most critical strength requirement for the floor slab of the tank containment structure is to be its service as foundation support for the used antifreeze tank when full (used antifreeze has a higher specific gravity than either clean or used solvent). Loading from the tank is higher than any expected hydrostatic pressure. As shown in the calculations in Appendix B, the strength of the floor slab appears to be adequate.

The most critical strength requirement for the concrete containment walls is from hydrostatic pressure with the containment full of ethylene glycol. As shown in Appendix B, the strength of the containment walls appears to be adequate.

The pressure containment capacity of the piping and other ancillary equipment items was reviewed and found to be adequate for the intended service.

4. <u>Foundation</u> (40 CFR 264.193(c)(2))

The foundation for the secondary containment vault, tanks and their contents is the soil subgrade and aggregate subbase described in Appendix A. A check of the subgrade bearing pressure shows maximum loads on the subgrade to be less than specified bearing capacity (see Appendix B).

5. <u>Leak Detection</u> (40 CFR 264.193(c)(3))

All components of this system are aboveground and are directly accessible for visual inspection.

SECONDARY CONTAINMENT ASSESSMENT (Continued)

6. <u>Liquid Removal</u> (40 CFR 264.193(c)(4))

The tank containment system is sloped to drain to sumps at each end of the containment structure. Liquid removal is accomplished by hand pumps or vacuum trucks.

7. <u>Device Requirements for Vault</u> (40 CFR 264.193(e)(2))

As shown by the calculations in Appendix B, containment for the tanks will have a design volume sufficient to hold 100 percent of the used antifreeze tank capacity. Since the system is inside a building, additional containment for rainfall is not required. Therefore, containment capacity for the storage tank system is considered sufficient.

Chemically-resistant external waterstops were formed where necessary at joints in the concrete walls by the application of Sika Flex-la joint sealant, described by concrete construction details and manufacturer's literature in Appendix A.

The tank concrete containment structure for the tanks has been coated with Sikagard 62 epoxy coating. As shown in the manufacturer's literature in Appendix A, this material is expected to be impermeable to and compatible with the waste antifreeze being stored. A few spots where the Sikagard 62 has flaked will require touch-up.

<u>SECONDARY CONTAINMENT ASSESSMENT</u> (Continued)

8. Ancillary Equipment (40 CFR 264.193(f)(1))

The piping for the used antifreeze system is aboveground. All ancillary equipment including piping are located within the containment structure. The pressure containment capacity, support, and protection of ancillary equipment appears to be designed satisfactorily.

CONCLUSIONS OF ASSESSMENTS

Based on the information included in this report, the used antifreeze storage system at the Safety-Kleen facility in Boynton Beach, Florida, appears to have been adequately designed to have sufficient structural strength and to be sufficiently compatible with the wastes being stored to not leak, collapse, rupture, or fail in their intended service. No evidence of damage, defects or improper installation was found, and tightness test records show no indications of leakage. A secondary containment system is provided that appears to meet the requirements of 40 CFR 264.193, except that secondary containment coating touch-up should be accomplished before the system is put into service.

ILLUSTRATIONS

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ILLUSTRATIONS

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<u>Title</u>

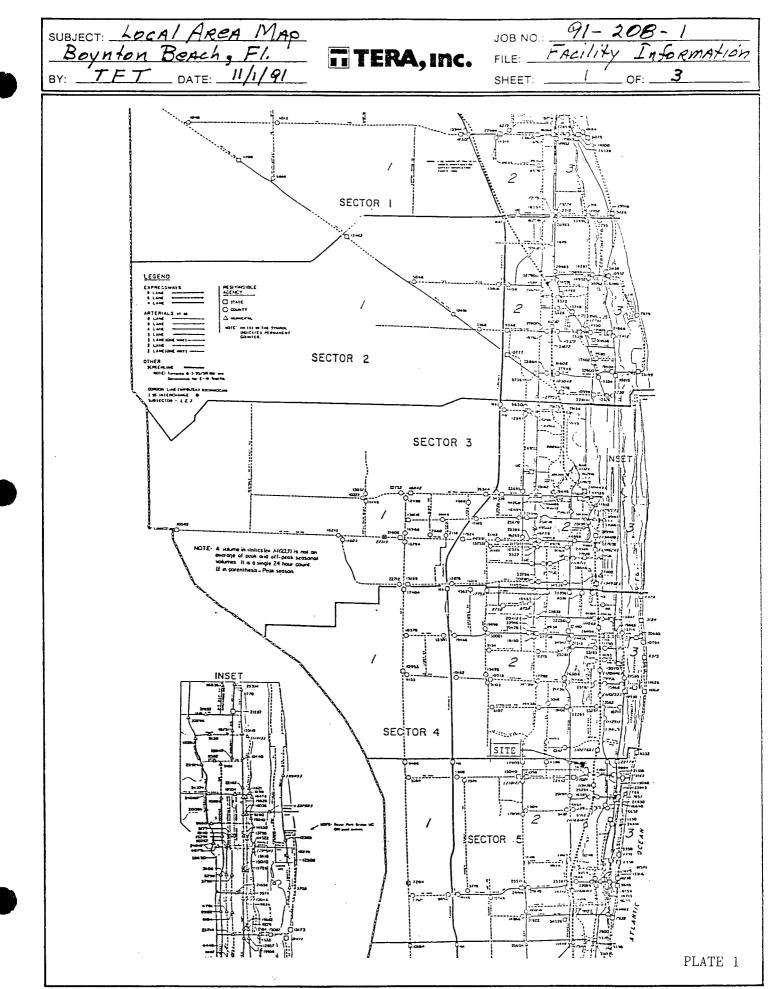
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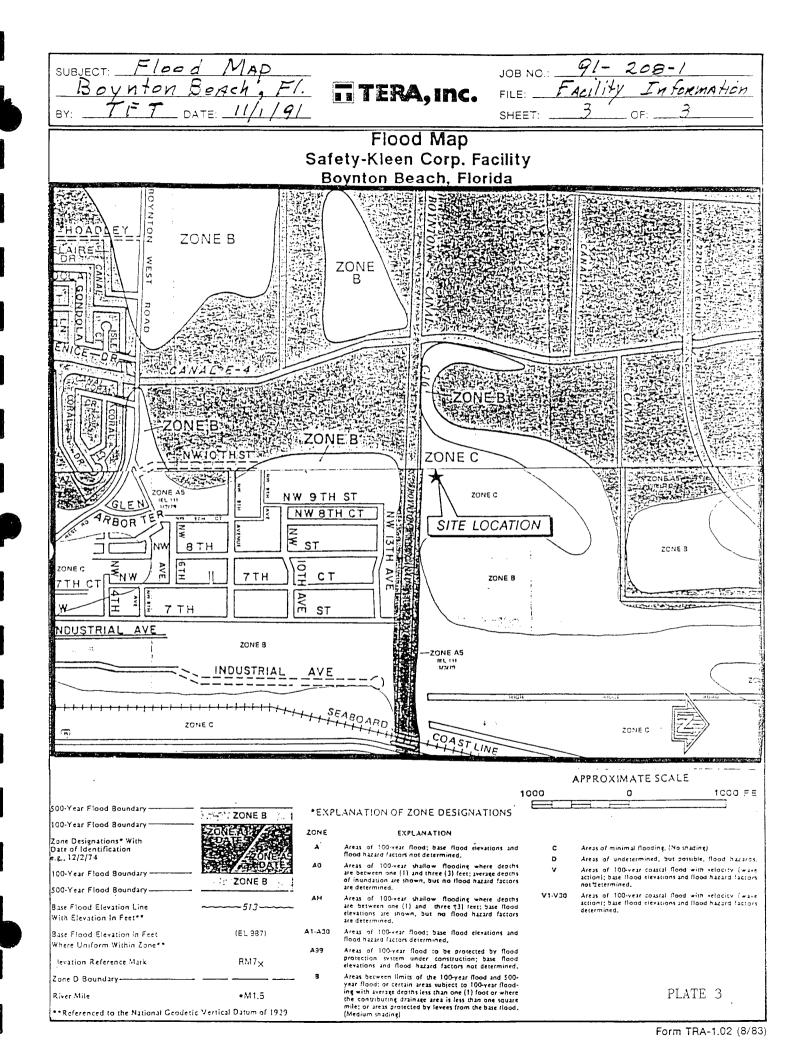
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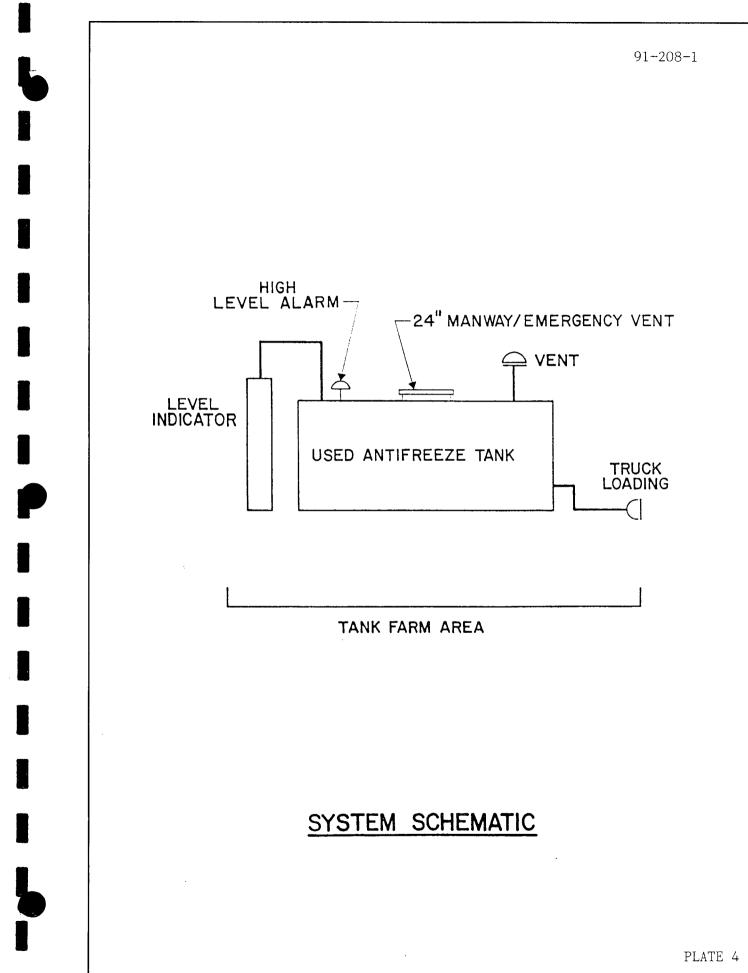
<u>Plate No.</u>

Local Area Map	•••	 •		1
Site Plan			• •	2
Flood Insurance Rate Map		 •		3
System Schematic, Used Antifreeze Tank				4



SUBJECT: <u>Site Plan</u> <u>Boynton Beach, Fl.</u> BY: <u>TFT</u> DATE: <u>11/1/91</u> TERA, INC	JOB NO.: <u>91-208-1</u> FILE: <u>FACILITY IN GRMATIC</u> SHEET: <u>2</u> OF: <u>3</u>
OFFICE RETURN/ WAREHOUS	DOR TANKS





APPENDIX A

Design Documentation

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APPENDIX A

Design Documentation

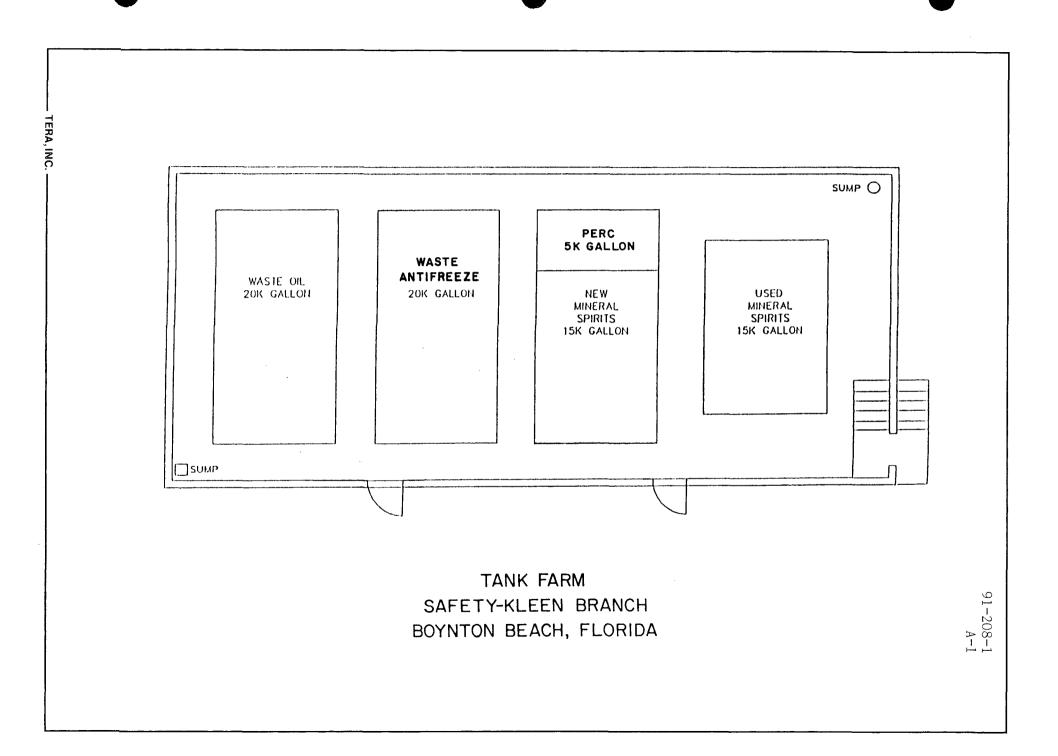
The information is this Appendix was provided by Safety-Kleen to TERA for purposes of this design assessment as being representative of in-place details. The inspection was limited to externally visible features and showed general conformance to these drawings. Where non-accessible details were needed in the assessment, such as reinforcement of concrete, they were assumed to be as shown here.

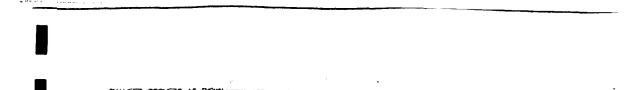
TABLE OF CONTENTS

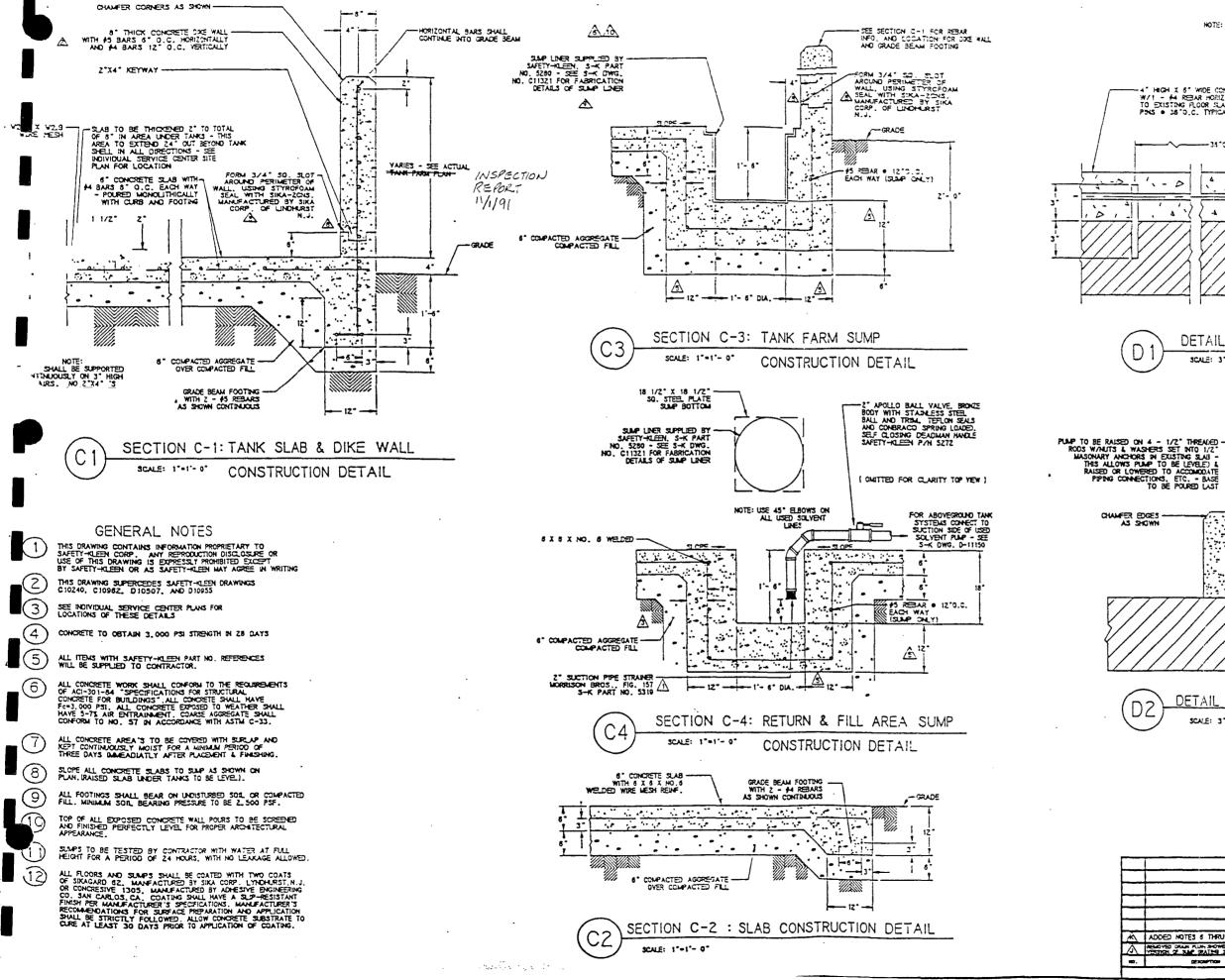
<u>Title</u>

<u>Page No.</u>

Tank Farm Plan	A-1
Typical Concrete Construction Details D11322	A-2
20,000 Gallon Horizontal Steel Aboveground Storage Tank	
Drwg. No. D12966	A-3
Emergency & Gate Valve Installation Details	A-4
High Level Alarm System - D13102	A-5
Moormann Bros. Tank Gauge Installation Al0243	A-6
Caulking/Coating Data	A-7

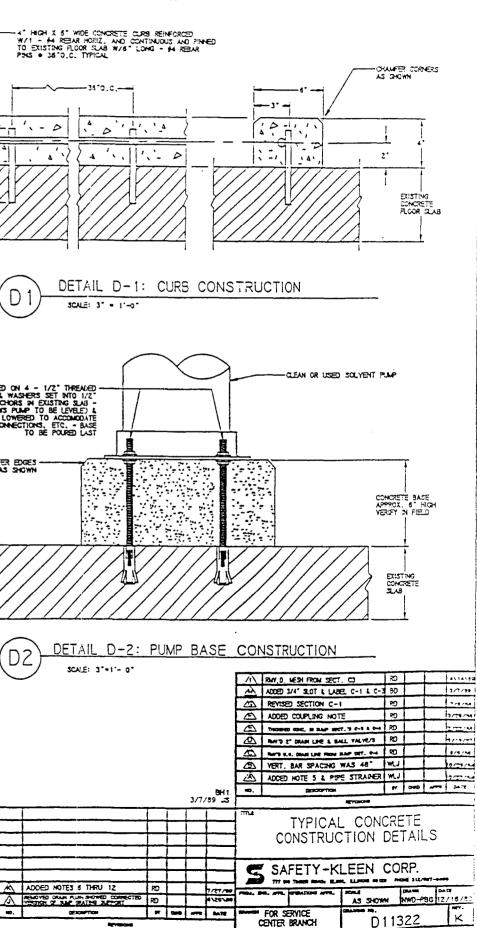




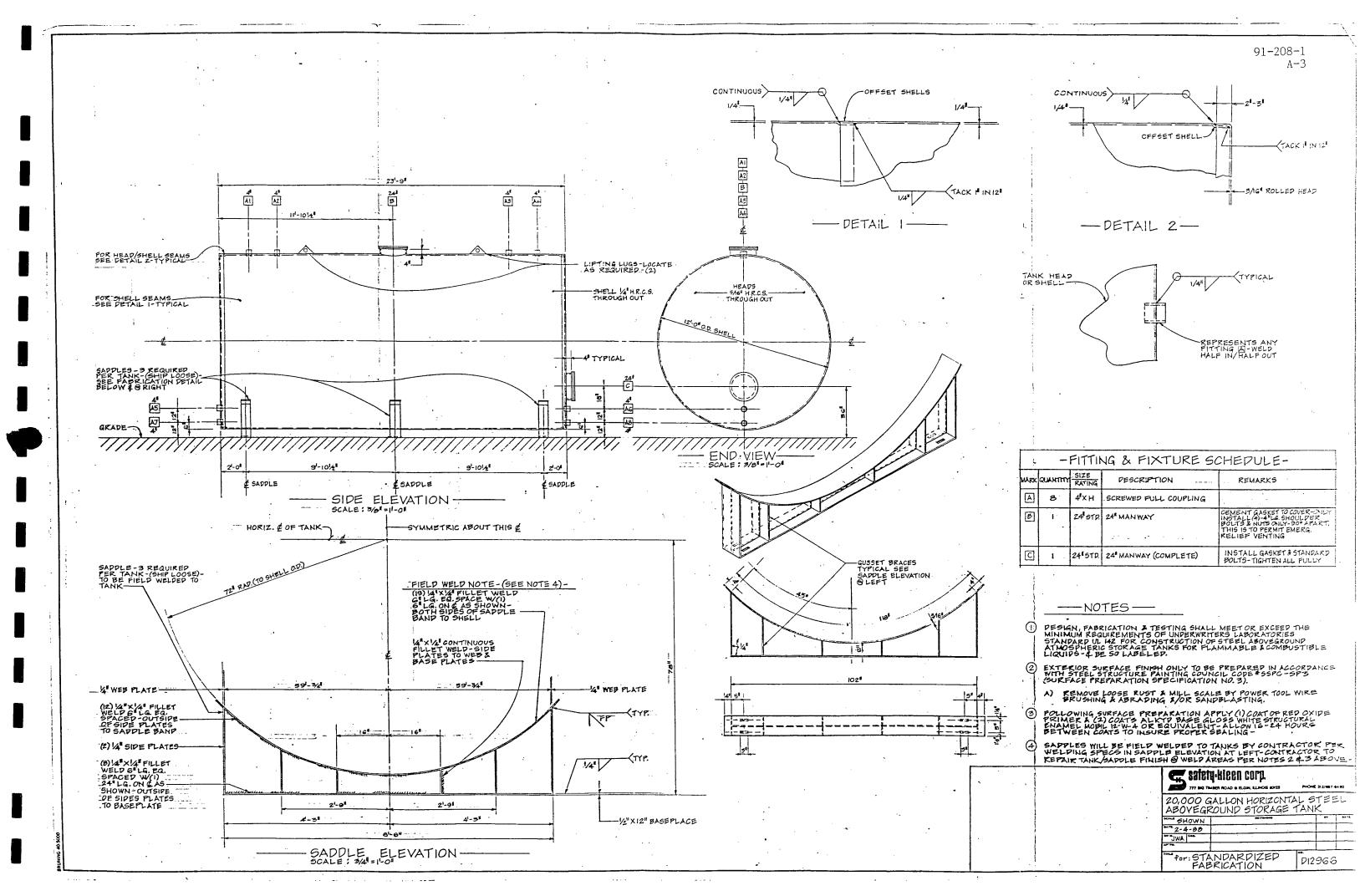


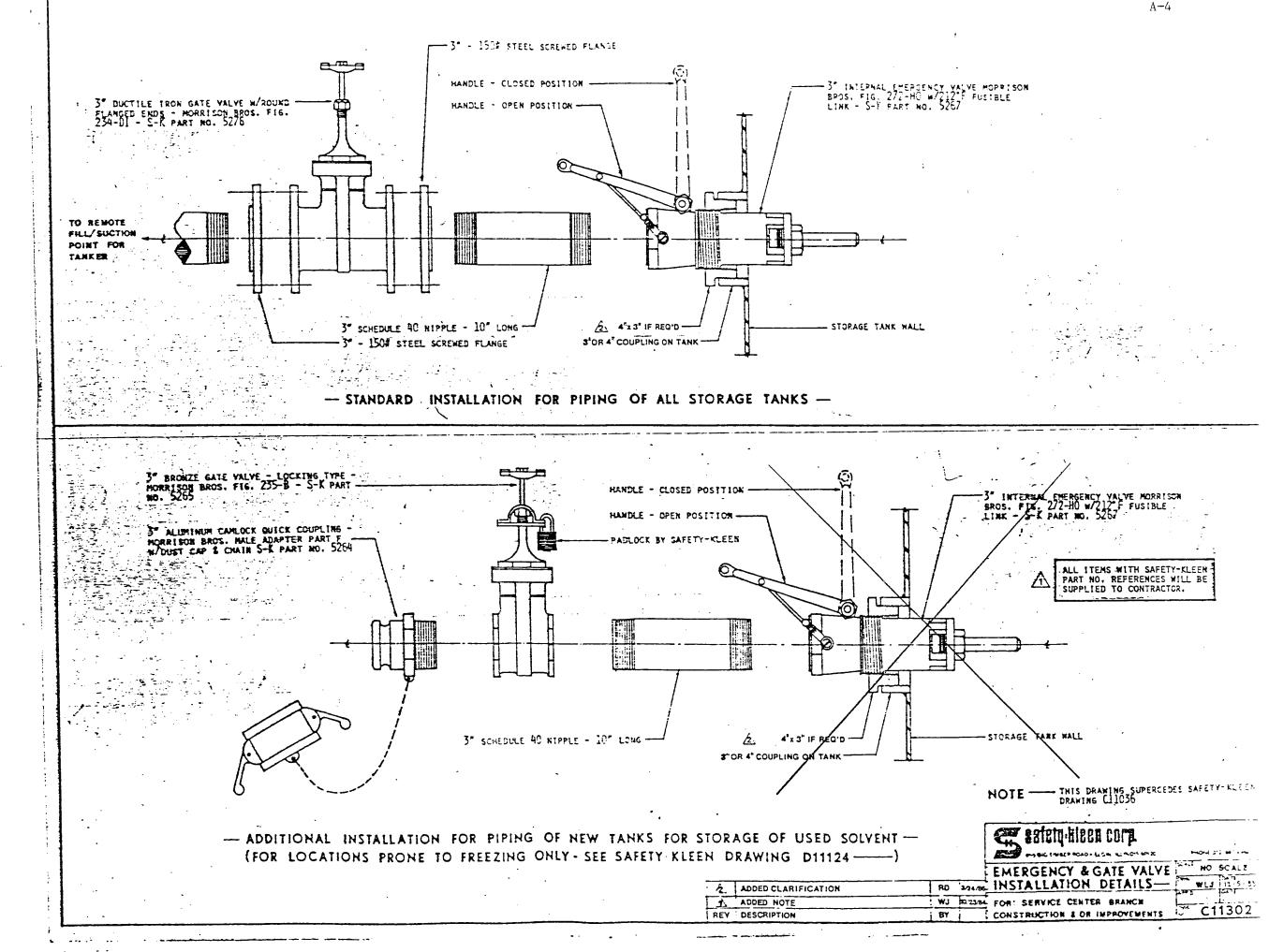


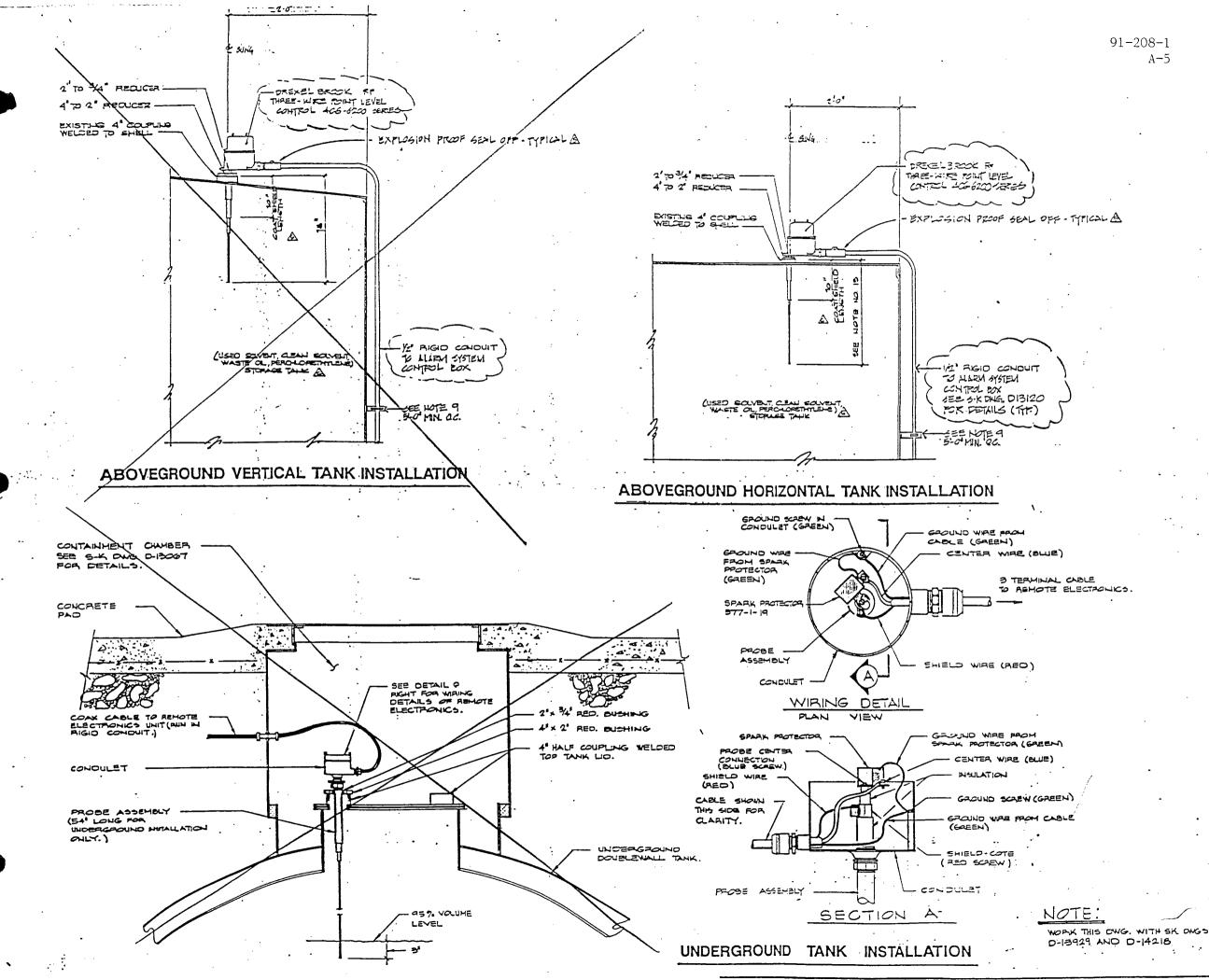
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- SEE INDEVIDUAL SERVICE CENTER SITE PLANS FOR RELATIVE LOCATIONS OF THESE DETAILS.
- CONTRACTOR TO SUPPLY & INSTALL CONDUCT SUPPORTS & SRACKETS AS REQUIRED.
- C. THIS DRAVING CONTAINS INFORMATION PROPRIETARI TO SAFETT-REEM CORP. ANI REPRODUCTION, DISCLOSURE OR USE OF THIS DRAVING IS EXPRESSIT PROHIBITED BY SAFETY-CLER
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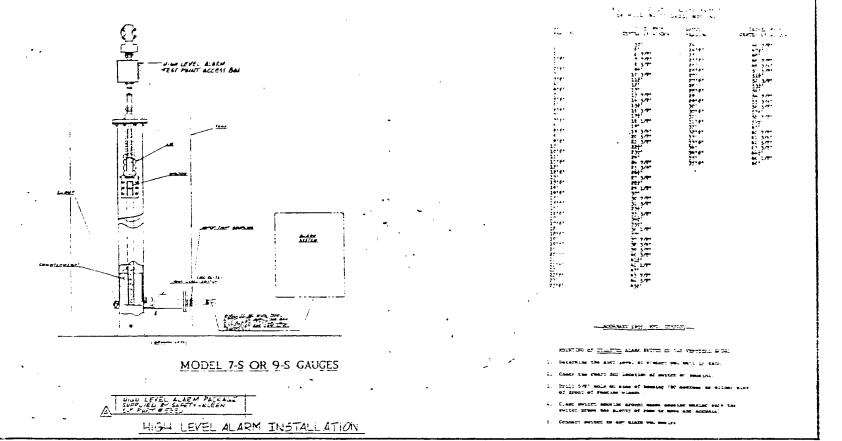
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MATERIAL LIST Model 7-S

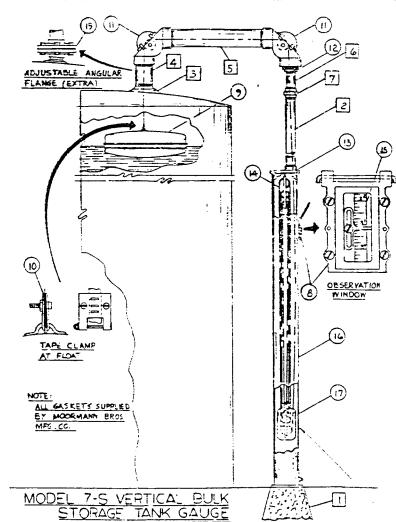
For All Vertical Tanks Up To & Including 25'

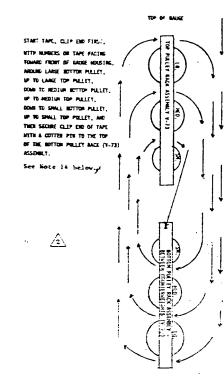
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- 2. 1" Getwenized Pipe tout to tempthi 1. Tank Roof Frange.
- 4. 2" Task Opening Pice. 5. 2" Gelvenzed Proc tout to length)
- 6. 1" Galvanized Nipple (any length).
- 7. 1" Geivenzad Union.

Material Supplied by Materian Bros. (SAPETY-KLEEN)

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	PART HAME	A-34-A-36	· · · ·
	Observation Window Assembly		
9.	Flort	V-75,	1
10.	Stainless Steel Tape Clamp & Screws	V-93	1
11.	Elbow Assembly Comolete	A-30, A-32	:
12	2" to 1" Reducing Busiving		
13.	Eccentric Cao Complete with Nuts & Bolts	V-71	
14.	Pulley Rack Assembly	V-73	:
15.	Lufkin Seamless Steel High Visibility Tabe	V-49	
16.	Rust-Proofed Steel Geuge Housing	V-77	1
17.	Counterweight	V-72	:
18.	Condensation Drain Plug		
	Frame & Lid Assambly for Observation Window	A-34, A-38	
	Gesizes - Set for Observation Window	V-81, V-82	
	Geslat - Boow Cap	V-83	:
	Geeket - V-71 Eccentric Cap	V-84	
	Glass - Window	V-86	
	Stainies Steel Indicator Emper		
	for Observation Window	V-94	1
	Wire Pan - Stausiess Sneet	V-96	





ENLARGED DETAIL SHOWING BOW TAPE IS WOUND ON PULLEY RACE ASSEMBLIES OF MODEMAIN MODEL #7-5. CUT OFF EXCESS TAPE AT FLOAT.

INSTALLATION INSTRUCTIONS - MODEL 7.5

- mon on pround -- mark top edge of tank directly above ground locates
- 2. Measure, cut and thread 2" pipe les menues on print).
- 3. the pipe dope on all connections
- mble both A-30 olbows and 2" pipe as shown an print.
- . Screw (1) allow A-30 anto 2" pipe with reducing bushing, close nipple and union as shown an other A-30 elbow onto 2" nipple in tenk then screw other end of 2" pape into tenk elbow nake straight with tank marking.
- 6. Level 2" pipe, use temporary wood brace or alignment fiange, if necessary
- Set gauge housing with econtrac cap essembled on ground directly below overhenging. Measura for 1" page feducing bushing in elbow to econtrac cap V-21 on gauge hous for threads, cut and thread 1" pipe.
- 5. Screw 1" pipe into elbow, than remove V-71 eccentric cap from housing and put a CAUTION Se sure eccentric cop is straight and 1" outlet is farithast every frace tank.
- 30. Fasten pulley rack with large pulley up to accontric cap using stainless steel pers
 - : other pulley rack in counterweights with large pulley down.
 - 12. Place counterweight on ground directly beneath eccentric cap pulley rack. 13. Remove A-33 caps from both eloows.

 - pulleys cown through 1° pice and out eccentric cap, streight down and examine bottom pulley is C/W and up and over too pulley in eccentric cap, down to medium pulley up and over madum pulley, down and around small pulley on C/W and up and around small pulley on eccentric cap. down and festen to lug on counterweight pulley rack-use steinless steel pin. CAUTION-Do not tivread tape over or under cross bers in pulley rack. Use caution-do not kank or bend tape.
 - Fasten tape to float with tape domp (as per print) CAUTION Do not fasten tape clamp too tight as this may demege term.
 - 16. Piece eccentric cap pasket on housing top and insert counterweight assembly into housing, CAU-TION Do not allow C/W to drop or tenk as this may cause damage to traamings, also be sure the tape is in groove of putterys and not cu the edge.
 - 17. Fasten housing to eccentric cap with observation window directly below 1" page.
 - 16 Place outside strend of table over taple guide in observation window, CAUTION Do not band or tink tape, and put ONLY CNE (1) strand of tape over the tape guide.
 - 19. If tank is emony adult tape reading at 1-3/8" (floet draft) if it is pertailly full see reading exactly with stics, mesc mesc tape reading "divatments with the floet by ul/poing tape through tape clemp. Minor adultments (within 1' meta with observation finger).
 - 20. In setting the reading on the gaupe, 1/2", 16" or even, 1/8" is not crise anough, be particular, set gaupe to the axiest amount of liquid in tenk.
 - 21. CAUTEON Let floet down in tenk easily. Do not let it drop.
 - 2. Assemble observation frame and Rd. A-34-A-38 place on housing, tythen for vapor-proofing 22. Fix base for housing either, concrete, wood post, at steal plate welcad so tank, CAUTION - Do
 - not weld gauge housing to lank.
 - 25. In most dimense, conclementarion forms inside the tenk and gauge. A dress plug has been provided for draining at the bottom of housing. In most climetes this is necessary 2 times a year upring & fell, however, in entreme cases draining is required more often.

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mic cap from housing and put on

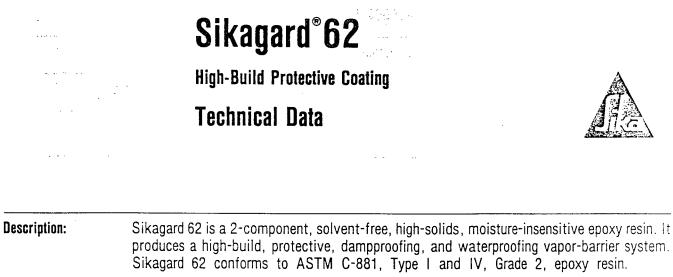
14. Thread type from tank allow with numbers up and clip ands first through 2" pipe and over allow

GENERAL NOTES ----

- 1. TANK GAUGE ASSEMBLY SUPPLIED BY SAFETY-KLEEN CORP.
- 2. SEE INDIVIDUAL SERVICE CENTER SITE PLANS FOR LOCATION OF THE INSTALLATION.
- 3. GAUGE MUST BE ORDERED WITH THE PERFORATED TAPE FOR FUTURE REMOTE READ-OUT SYSTEM.
- HIGH/LDK LEVEL ALARM SWITCH INFORMATION, MATERIAL LIST & INSTALLATION INSTRUCTIONS INCORPORATED ONTO DRAWING.

▲ 5. IF REQUIRED, ADDITIONAL VERBAL INSTALLATION INSTRUCTIONS CAN BE OBTAINED BY CALLING MOORNAN BROS. MFG. CO., RUNVILLE, INDIANA - (317) 932-3590 -ACK COP. ASK FOP BOB GAINES OR JIM RAVENCRAFT

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Where To Use:	Use as a high-build, corrosion-resistant, protective coating, or as a seamless flooring system on dry and can't-dry substrates.			
Advantages:	 Protects dry and can't-dry substrates. Exceptional tensile strength. Good chemical resistance for long-term protection. Convenient B:A = 1:1 mixing ratio. Easy, paint-like viscosity. Durable, smooth finish permits wipe-off graffiti-removal. Available in 3 standard colors; gray, red, and tan. Special color matches available upon request. Excellent bonding to all common structural substrates. Super abrasion resistance for long-term wear. Sikagard 62, Gray, after cure, is approved for contact with potable water. All colors are USDA-approved for use in food plants. 			
Coverage:	225-400 sq ft/gal (4-7 mils)			
Packaging:	4-gal units; 1-qt units, 12/case.			

			91-208-1 A-8	
Typical Data for Sikag (Material and curing	ard 62: 1 conditions @ 73F and 50	1% R.H.)	A	
Shelf Life:	2 years in original, uno	opened containers.		
Storage Conditions:	Store dry at 40-95F. (Condition material to 65-85F before using.		
Color:	Gray, red, tan.			
Mixing Ratio:	Component 'A' : Compo	onent 'B' = 1:1 by volume.		
Viscosity:	Approx 2,700 cps.			
Pot Life:	Approx 35 min.			
Application Life:	20-25 minutes.			
Tack-Free Time:	Approx 4 hr.			
Open Time:	Light foot traffic - 5-7 Rubber-wheel traffic -			
Immersion and chemical exposure:	3 days			
Tensile Properties (AS	STM D-638):			
14 day Tensile Str Elongation		6,400 psi 2.7 %		
Abrasion (Taber Abra 7 day Weight los (H-22 whee	-	0.61 gm		
Abrasion Resistance (14 day Abrasion C		51 liters/mil		
Adhesion (ASTM D-3 1 day Adhesion Cl		4A		
Water Absorption (AS 7 day Total Water (2-hour boi	Absorption	0.9%		

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	NOT FOR INTER	ER TIGHTLY CLOSED NAL CONSUMPTION INSULT MATERIAL SAFETY DATA SHEE	KEEP OUT OF REACH OF CHIL For Industrial USE T For More Information	DREN ONLY
Clean Up:	can be remove	Confine spill. Collect with absorbent m vith current, applicable local, state, a d with approved solvent. Cured mate	rial can only be removed mechani	cally.
	respiratory pro	blems, remove person to fresh air.	Wash clothing before re-use.	
First Aid:		n contact, wash thoroughly with so th plenty of water for at least 15 minu		
	recommended.	strong sensitizer. Use of safety g Remove contaminated clothing. Av e of a NIOSH/MSA organic vapor	void breathing vapors. Use ade	loves quate
	Component 'B'-C eye contact.	orrosive - Contains amines. Contact w	-	
Caution:	Component 'A'-Ir Avoid eye cont	ritant - Contains epoxy resins. Prolonge act.	d contact with skin may cause irrit	ation.
		re to sunlight. plications only, thin with Sika Epoxy ed.	Thinner at 5% by volume. Thin or	ıly
	conditions. • Do not apply	to exterior substrate on-gradeepo:		
	 Do not apply Consult Tech 	to porous surfaces exhibiting moisture nical Service. of concrete prior to application is 21-	e-vapor transmission during applic	
		to surfaces where vapor can condens osulate saturated concrete in areas of		
	 Material is a 	vapor barrier after cure.		
		ostrate temperature for application 50 over wet, glistening surface.		

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Chemical Resistance:

Specimen: Two coats- 10 mils Cured 10 days Substrate: asbestos cement

CHEMICAL	TEST	STORAGE TIME AND EVALUATION				
CHEMICAL	TEMP.	1 Day	1 Month	2 Months	6 Months	12 Months
Water	75F	A	A	A	A	A
	100F	A	A	A	A	А
	140F	A	A	A	A.D	A.D
Sodium Chloride Solution	75F	A	A	A	A	A
(Saturated)	100F	A	A	A	A	A
Sodium Hydroxide 30%	75F	A	A	А	A	A
Cement Water (Saturated)	75F	A	A	A	A	A
Detergent Solution (5% Ajax)	75F 140F	A	A	A	A A.D	A A.D
Hydrochloric Acid 10%	75F	A	A	A	A	A
Sulfuric Acid 10%	75F	A	A	A	в	3
Oxalic Acid 10%	75F	A	A.D	A,D	A.D	A.D
Citric Acid 10%	75F	A	A,D	A.D	A.D	A.D
Fuel Oil (Home Heating)	75F	A	A	A	A	A,D
Gasoline (Unleaded)	75F	A	A	A	A	A.D
Iso-Octane	75F	A	A	A	A	A.D
Toluol	75F	A	A	A	A	A.D
Silage	75F	A	A	A,D	A.D	B.D
Synthetic Silage	75F	A	A	B,D	B.D	5.D
Liquid Manure	75F	A	A	A	A	A.D
Ethyl Alcohol	75F	A	С	_		

A: Resistant in permanent contact B: Temporary resistance C: Destroyed D: Discolored

How To Use

Surface Preparation:	Surface must be clean and sound. It may be dry or damp, but free of standing water. Remove dust, laitance, grease, curing compounds, impregnations, waxes, foreign particles, and disintegrated materials. Preparation Work: Concrete - Sandblast or use other approved mechanical means. Steel - Sandblast to white-metal finish.
Mixing:	Pre-mix each component. Proportion equal parts by volume of Component 'A' and Component 'B' into a clean mixing container. Mix with a low-speed (400-600-rpm) drill and Sika paddle for 3 minutes, until uniform in color. Mix only that quantity that can be used within its application life.
Application:	Apply coating using high-quality rollers or brushes, or spray. Two coats are recommended. Apply second coat as soon as the first coat is tack-free and the traffic of application will not damage the first coat. The second coat, however, must be applied within 48 hours since a longer delay will require additional surface preparation. For slip-resistance, add approximately ½ lb/gal of Sikagard 62 Granules to the mixed material and apply as first coat. Saturate roller or brush with material and apply first to a disposable cardboard or other surface to distribute the granules evenly on the equipment. Do not spray with Sikagard 62 Granules in the coating. When spraying, use the following or similar equipment: Binks Model #18 Air Atomized Spray Gun (#68 fluid nozzle, #68 PB air nozzle, #68 fluid needle, #83-5661, 2-gal pressure fluid tank). For Sikagard 62 Flooring System information consult your Technical Data Sheet or call Technical Service.

Sikaflex[®]-1a

Elastomeric sealant/adhesive

Technical Data



Description:	Sikaflex-1a is a premium-grade, high-performance, moisture-cured, 1-component. polyurethane-base, non-sag elastomeric sealant.
Where to Use:	 Designed for all types of joints where maximum depth of sealant will not exceed ½ in. Excellent for small joints and filletswindows, door frames, reglets, flashing, and many construction adhesive applications. Suitable for vertical and horizontal joints; readily placeable at 40F. Has many applications as an elastic adhesive between materials with dissimilar coefficients of expansion.
Advantages:	 Easy, low-cost, ready to use. Eliminates time, effort, and equipment for mixing, filling cartridges, pre-heating or thawing, and cleaning of equipment. High elasticity - cures to a tough, durable, flexible consistency with exceptional.cut- and tear-resistance. Excellent adhesion - bonds to most construction materialswithout primer in most cases. Long life. Excellent resistance to aging, weathering. Proven in tough climates around the world. USDA-approved: chemically acceptable to the U.S. Department of Agriculture for use in meat and poultry processing area. Odorless, non-staining Paintable with water-, oil-, and rubber-base paints. Jet fuel resistant. Meets Federal Specification TT-S-00230C, Type II, Class A. Meets ASTM C-920, Type S, Grade NS, Class 25. Meets Canadian Standard 19-GP-16A, Type II. EPA-approved for potable-water contact. Urethane-based, suggested by EPA for radon reduction.
Coverage:	10.3-fl-oz cartridge seals 12.4 lineal ft of ½- x ¼-in. joint. 20-fl-oz uni-pac sausage seals 24 lineal ft of ½- x ¼-in. joint.
Packaging:	Disposable 10.3-fl-oz, moisture-proof composite cartridges, 24/case, and uni-pac sausages, 20-fl-oz, 20/carton; Available on special order 1.8- and 4.5-gal pails, 50-gal drums, and 10.3-fl-oz uni-pac sausages.

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Colors:	White, colonial white, architectural colors or	aluminum gray, limestone, black, dark bronze, capitol tan. Specia request.
	z cartridges	12 months
10.3- an	d 20-fl-oz uni-pac sausa	ges 12 months
1.8-gal	•	4 months
4.5-gal	pails	4 months
50-gal dru	lms	4 months
Storage Conditions:	Store at 40-95F. Con	dition material to 65-85F before using.
Application Temperature:	40 to 100F. Sealant sho	uld be installed when joint is at mid-range of its anticipated movement
Service Range:	-40 to 167F	
Curing Rate:	Tack-free Time	6 to 8 hours (TT-S-00230C)
,	Tack-free to touch	3 hours
	Final cure	5 to 8 days
Recovery	>90%	
Shore A Hardness (AS ⁻ 21 day	TM D-2240): 40±5	
Topollo Dropartico (AQ	TH D 419).	
Tensile Properties (AS 21 day	Tensile Stress	140 psi
	Elongation at Break	700%
	Modulus of Elasticity	
	modulus of Elastory	50% 60 psi
		100% 80 psi
Lap-Shear Strength (A	STM D-1002), modified, gl	ass substrate
21 day	50F	120 psi
•	73F	125 psi
	122F	125 psi
Adhesion in Peel (TT-S	-00230C):	· · · · · · · · · · · · · · · · · · ·
Substrate	Peel Strength	Adhesion Loss
Aluminum	25 lb	10%
Glass	20 lb	5%
Concrete	20 lb	0%
Weathering Resistance:	Excellent	
Ozone Resistance:	Exceptional	
Chemical Resistance:	Good resistance to wat for specific data.	er, diluted acids, and diluted alkalines. Consult Technical Service
Radon Reduction:	•••	duction in radon. Independent laboratory evaluation. Actual result t, consult Technical Service.

Caution:		91-208-1 A-13	
FHSLA Toxicity Test (16 CFR 1500) Primary skin irritant Eye irritant Acute oral toxicity Acute inhalation Acute dermal toxicity		FHSLA Toxicity Category Skin irritant Eye irritant Non-toxic orally Not toxic by inhalation Not toxic dermally	
Combustible:	Keep away from open flames and high hadequate ventilation.	eat. Contains xylene; avoid breathing vapors. Use with	
Irritant:	Avoid skin and eye contact. Use of N goggles, and chemical-resistant gloves shoes.	IOSH/MSA approved organic vapor respirator, safety s recommended. Remove contaminated clothing and	
First Aid:	In case of skin contact, wash thoroughly with soap and water. For eye contact, flush immediately with plenty of water for at least 15 minutes; contact physician. Wash clothing before re-use. Discard contaminated shoes.		
Clean Up:	Uncured material can be removed with approved solvent. Cured material can only be removed mechanically. For spillage, collect, absorb, and dispose of in accordance with applicable local, state, and federal regulations.		
	KEEP CONTAINER TIGHTLY CLOSED NOT FOR INTERNAL CONSUMPTION CONSULT MATERIAL SAFE	KEEP OUT OF REACH OF CHILDREN FOR INDUSTRIAL USE ONLY TY DATA SHEET FOR MORE INFORMATION	
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Export Division NJ, Lyndhurst		Telefax

March, 1990

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How To Use

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Surface Preparation:	ration: Clean all surfaces. Joint walls must be sound, clean, dry, frost-free, and free of oil and grease. Curing compound residues and any other foreign matter must be thoroughly removed. Install bond breaker tape or backer rod to prevent bond at base of joint.	
Priming:	Priming is not usually necessary. Most substrates only require priming if testing indicates a need or where sealant will be subjected to water submersion after cure. Consult Sikaflex Primer Technical Data Sheet or Technical Service for additional information on priming.	
Application:	Recommended application temperatures: 40-100F. For cold weather application, store units approximately 70F; remove just prior to using. For best performance, Sikaflex-1a should be gunned into joint when joint slot is at mid-point its designed expansion and contraction. Place nozzle of gun into bottom of the joint and fill entire joint. Keep the nozzle in the sealar continue on with a steady flow of sealant preceding the nozzle to avoid air entrapment. Avoid overlapping of sealant to eliminate entrapment of air. Tool as required. For use in horizontal joints in traffic areas, the absolute minimum depth of the sealant is ½ and closed cell backer rod is recommended over open cell to offer greater support	
Limitations:	 Allow 1-week cure at standard conditions when using Sikaflex-1a in total water-immersion situations. Avoid exposure to high levels of chlorine. Maximum depth of sealant must not exceed ½ in.; minimum depth is ¼ in. Maximum expansion and contraction should not exceed 25% of average joint width. Do not cure in the presence of curing silicone sealants. Avoid contact with alcohol, and other solvent cleaners, during cure. Do not apply when moisture-vapor-transmission condition exists, from the substrate, as this can cause bubbling within the sealant. Use opened cartridges and uni-pac sausages the same day. When applying sealant, avoid air-entrapment. Since system is moisture-cured, permit sufficient exposure to air. White color tends to yellow slightly when exposed to ultra-violet rays. The ultimate performance of Sikaflex-1a depends on good joint design and prope application with joint surfaces properly prepared. Minimum depth of sealant in horizontal joints subject to traffic is ½ in. 	

APPENDIX B

Design Review Documentation

– TERA, INC. –

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<u>APPENDIX B</u>

Design Review Documentation

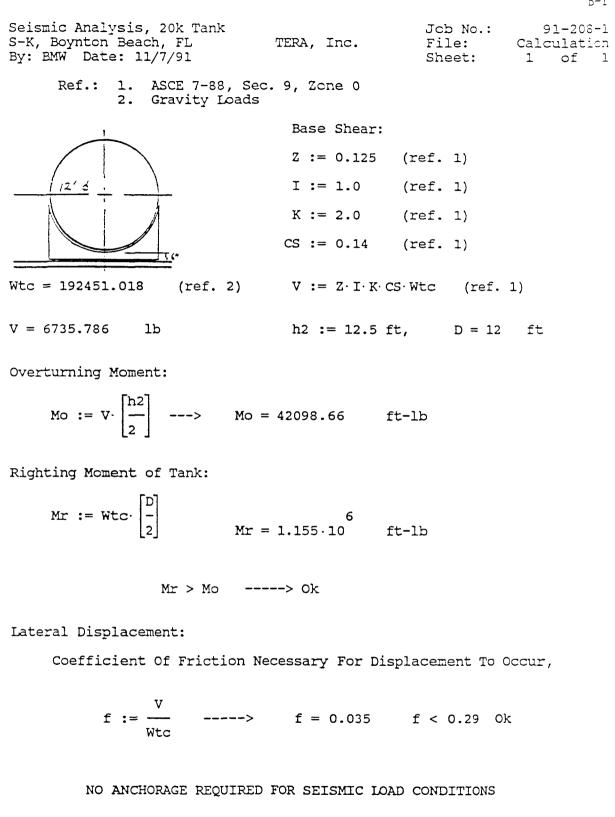
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Piping System Review (Used Antifreeze)	B- 9
NFPA 30 - Piping, Valves and Fittings Compliance Checklist	B-10



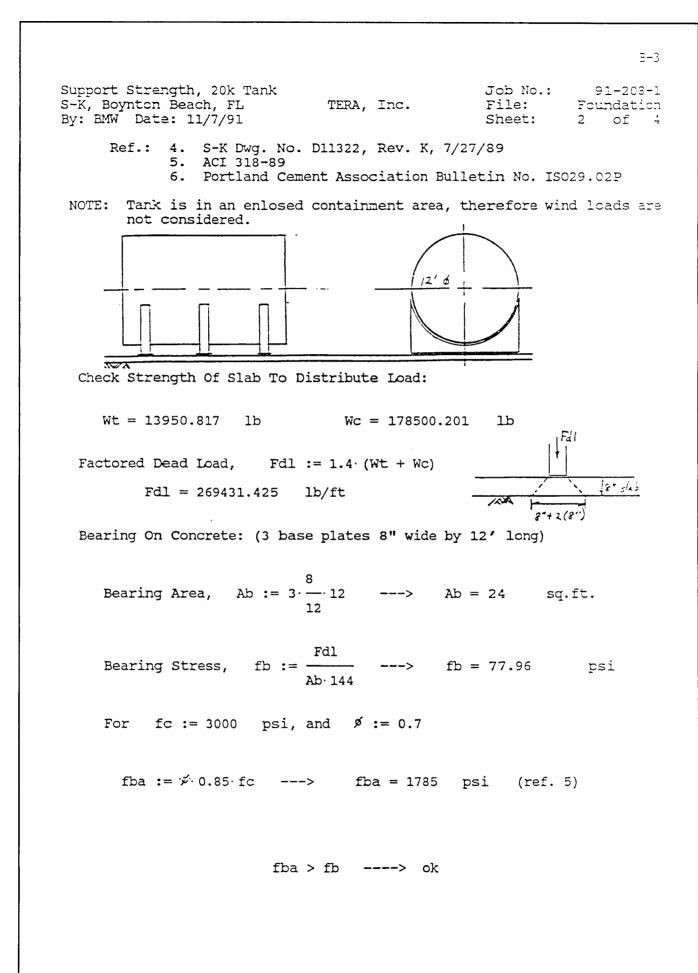
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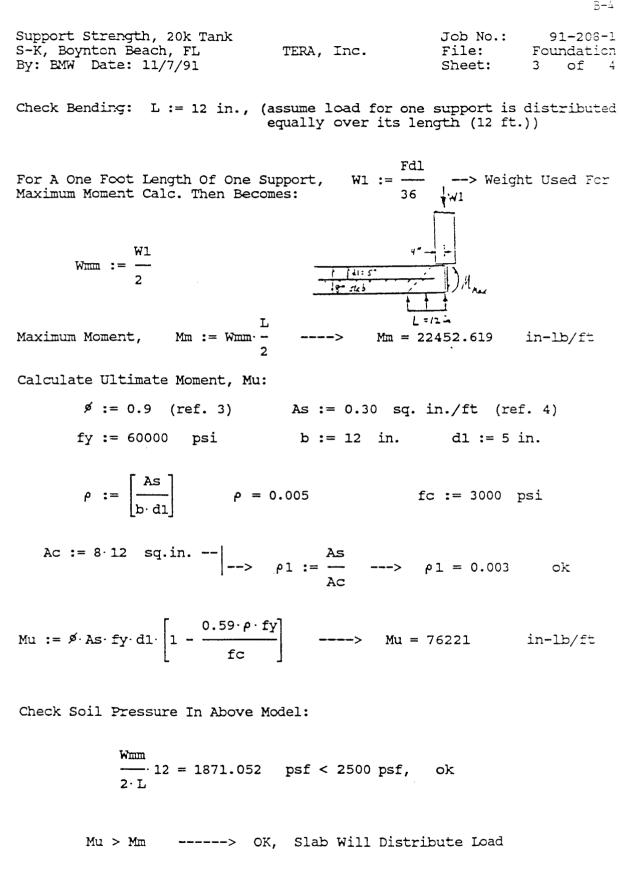
Gravity Loads, 20k Tank Job No.: 91-208-1 S-K, Boynton Beach, FL TERA, Inc. Foundation File: By: BMW Date: 11/6/91 Sheet: 1 of 4 Ref.: 1. S-K Dwg. No. D10570, Rev. 7, 9/12/83 Tank Farm, Fig. II.C.2-1A, Branch Permit Documentation 2. 3. UL 142, Sections 5-8 Tank Self-Weight: D := 12 ft, t1 := 0.250 in, h1 := 4.0 ft w := 490 pcf, L := 24 ft π 2 tl Head Weight, Wh := $-D \cdot - w \cdot 2 - - w \cdot 2$ Wh = 2309.071 lb (ref. 3) 12 4 tl Shell Weight, Ws := $\pi \cdot D \cdot L \cdot \cdots \cdot W$ ---> Ws = 9236.282 1b (ref. 3) 12 Weight of Saddles, (3 ea.): 8 0.5 Base Plates, Bp := $-- \cdot 12 \cdot --- \cdot 3 \cdot w$ ---> Bp = 490 lb 12 12 tl Saddle Plates, Sp := 1.15.8. --- 3.w ---> Sp = 483.875 lb 12 8 t1 $sp := - h1 \cdot - 6 \cdot w$ ----> sp = 163.333 lb Side Plates, 12 12 W := Wh + Ws + Bp + Sp + sp ----> W = 12682.561lb Misc. Fittings & Apprtnces @ 10%, Ms := 0.1 W Ms = 1268.256 lb Tot. Tank Weight, Wt := W + Ms ---> Wt = 13950.817 lb Weight Of Contents: SG := 1.07 V := 20000 gal., V := 7.481 gal/cu.ft. v Wc := $-\cdot \Gamma \cdot SG$ ----> Wc = 178500.201 lb v Total Weight, Tank And Contents, Wtc := Wt + Wc Wtc = 192451.018 lb

- TERA, INC. -

B-2



- TERA, INC. -



B-4

Support Strength, 20k Tank Job No.: 91-208-1 S-K, Boynton Beach, FL TERA, Inc. File: Foundation By: BMW Date: 11/8/91 Sheet: 4 of 4 Check Subgrade Bearing: Calculate Total Weight Resting On Soil: Wtanks := 438314 lb (weight of other tanks & contents) Wvault := 211738 lb (weight of containment vault) Wt = 13950.817lb (weight of waste E.G. tank) Wc = 178500.201(weight of waste E.G.) lb (estimated weight of the building) Wb := 240425lb Ag := 72.333·31.417 (gross outside area of vault) Ag = 2272.486sq.ft.

Studies Conducted (See Ref. 6) Indicate That The Loads Listed Above Will Be Spread Over The Full Area Of The Containment Vault With Only Minor, Localized Bending In The Containment Slab. Based On This, Approximate Subgrade Bearing Is Taken To Be:

 $Fac := \frac{Wtanks + Wvault + Wt + Wc + Wb}{Ag}$ ----> Fac = 476.539 psf

According To Ref. 4, The Allowable Subgrade Bearing Pressure,

Fal := 2500 psf

Fal > Fac -----> ok

Containment Wall Strength Job No.: 91-208-1 S-K, Boynton Beach, FL TERA, Inc. File: Calculation By: BMW Date: 11/8/91 Sheet: 1 of 1 Ref.: 1. Containment Inspection Record, This Report 2. ACI 318-89 2-1 SG := 1.07 Γ := 62.4 pcf = 5 Bars B 6' O.C. Horiz. h := 3.417 ft (ref. 1) = 4 3 ars 012 " O.C. Yert. 'n $P := \left\lfloor 0.5 \cdot SG \cdot h \right\rceil \cdot \Gamma$ Hydrostatic Pressure Gradient (40) ;E=Y P = 389.788 lb/ft, unfactored 1/2=13.67" $Pf := 1.4 \cdot P$ (ref. 2) Pf = 545.703 lb/ft, factored Ø := 0.9 (ref. 2) As := 0.2 sq.in. Ac := 8.12 sq.in. fy := 60000 psi b := 12 in. As P1 := ─ d2 := 4 in. fc := 3000 psi Ac As p := -----> $\rho = 0.004$ $\rho 1 = 0.002$ ok b∙ d2 $Mu := \oint As \cdot fy \cdot d2 \cdot \left[1 - \frac{0.59 \cdot \varphi \cdot fy}{fz}\right]$ ---> Mu = 41076 in-lb/ft 12 · h Mh := Pf - -Mh = 7458.669----> in-lb/ft 3 Mu > Mh0k ----> Mu Safety Factor, SF := --SF = 5.507Mh

These Calculations Are Made Even More Conservative By The Assumption That The Containment Area Is Full Of Ethylene Glycol, Not Water.

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Containment Volume, 20k Tank Job No.: 91-208-1 S-K, Boynton Beach, FL TERA, Inc. File: Calculation By: BMW Date: 11/8/91 Sheet: 1 of 1 Ref.: 1. Containment Inspection Record, This Report L := 72.333 W := 31.417 ft, ft by ed solvent Total Area, $A := L \cdot W$ ALW solvent 0-A = 2272.486sq.ft. LASTE E.G. 2 Average Wall Height, H := 3.167 ft was Te Gross Volume, $V := A \cdot H$ o;1 V = 7196.963cu.ft. 31-5" 20000 Tank Volume To Be Subtracted, Tv := -7.481 Tv = 2673.439cu.ft. Volume Of Misc. Equipment, @ 1% Of Gross Volume, To Be Subtracted, Mv := 0.01·V ----> Mv = 71.97cu.ft. Displacement Of Three Horizontal Tanks, Dia. = 12 ft; Two Of 24 ft, One Of 18 ft In Length, To Be Subtracted, R := 72 in i := 32 in d := R - i ---> d = 40in R · acos Vdis := -144 Vdis1 := Vdis · 2 · 24 Vdis2 := Vdis 18 Vdis1 = 898.27 cu.ft. Vdis2 = 336.851 cu.ft. D1 := Vdis1 + Vdis2 Displacement Of 2" Raised Pad, Vp := 65.0.25.417.0.1667 Vp = 275.406cu.ft. Net Volume Remaining, Vn := V - Tv - Mv - D1 - Vp Vn = 2941.026 cu.ft. (conservative estimate) CONTAINMENT VOLUME IS SUFFICIENT

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20 K HORIZONTAL TANK-S-K TTERA, INC. BY: T.F.T. DATE: 11/6/91 Ref: 1. Safety - Kleen TANK DRAWING	SHEET:	<u>Calculation</u> 1OF:
Ref: 1. Safety - Kleen TANK DRAWING		
	No. Dix	2966
2. MORRISON BROS. Co., 1989 Ed.	Venting	Guide Fax
Aboveground Storage T.		
3. UL 142 - 6th Ed., Sept. 14, 19	987: Sta	ndard For
Steel Above GROUND TANKS	For F	TAMMAEle And
Combustible Liquids.		
TANK CAPACITY : 20,000 GAIL	ons	
TANK Size; 12'\$ × 24'L		
Wetted AREA = 848 ft' - TA	ble R-1	Ref-2
Venting Capacity = 476, 880 St /h,	r Table	10-1 Ref-2
Normal Vent min 2.5" Table 10	0-2 Ret	^c - 3
Vent Combination - Ref - 2 (c	ок Аррка	oved Equivalent)
3" Fig 548 - 802P -	38,80	00
8" Fig 244 - 1602P -		
		o ft ^s /hr
		507777
Loose Bolt MANWAY used As th	ne emer	egency Vent
must be 16 \$ Min. And the	Cover i	must be
must be 16 "& Min. And the Able to be lifted 1.5" Min	Sec 10.6	, Page 12 Ref - 3
The combination of the 3"N		
Loose Bolt 24" MANWAY Meets Requirements	_ , _ , _ , _	
Since the Used AntifReeze Liquin	d is not	flammakle
or combustible, the listed emerge	ncy yen	+ Requirements
do not apply	/	

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USED ANTIFREEZE PIPING SYSTEM REVIEW

Safety-Kleen used antifreeze may be a hazardous waste (under characteristic leaching procedure standards) but it is not a flammable or combustible liquid as defined by NFPA 30 "Flammable and Combustible Liquids Code". Although not by definition required, NFPA 30 is an appropriate guideline or standard for the design of piping systems which handle hazardous liquids.

NFPA 30 generally requires that pipe, valves, fittings, and other pressure-containing components meet the material, pressure, and temperature limitations of ANSI B31.3 "Chemical Plant and Petroleum Refinery Piping" or ANSI B31.4 "Liquid Petroleum Transportation Piping This system operates outdoors under ambient temperature Systems". conditions. This falls within the ANSI materials specification range of -20 to 200°F. The normal operating pressure for the system piping will be the pressure required to overcome friction and lift the liquid to the top The system piping components will therefore normally of the tanks. operate at less than 30 psi. If the system pump was turned on in a blocked condition (i.e., with all discharge valves closed) the system components between the pump and the discharge valves would experience a pressure limited by the pump discharge relief valve. Pumps used for loading or unloading these tanks must have a relief valve set for no more than 200 psi.

Components rated for ANSI 125 or 150 lb (or better) class service should be suitable for use in this service. The normal system operating pressure is well within the allowable pressure-temperature ratings for both those classes. The 200 psi to which some components might occasionally be exposed is also within the allowable ambient temperature pressure range for ANSI 150 lb. class and is less than the allowable hydrostatic test pressure for ANSI 125 lb. class components.

In summary, compliance with the items on the "TERA Piping, Valve, and Fitting NFPA 30 Checklist" indicates compliance with the requirements of the NFPA 30 system piping.

91-208-1 B-10

PIPING, VALVES, AND FITTINGS

NFPA 30-1990 Compliance Checklist

for Safety-Kleen Corp. Aboveground Tank Systems

Branch Location: Boynton Beach, Florida Review By: TFTDate: 10/31/91

- N/A 1. Pumps to be ITT Marlow 20EVP-A, 30 EV-A, or 1-1/2 HR49EC series pumps.
- YES 2. Steel piping meets ASTM A53, A106, A120, or A135 specifications.
- YES 3. Wall thickness of threaded pipe meets ANSI B16.10 specifications for Schedule 80 for sizes 1-1/2" and smaller and Schedule 40 for sizes 2" and larger. Wall thickness of welded pipe of all sizes meets Schedule 40 requirements as a minimum.
- <u>N/A</u> 4. Dumpster hose assembly to be S-K Part No. 5237 (per Safety-Kleen drawing D10452).
- YES 5. Valves Morrison Brothers (S-K standard items) or meet ANSI 125 or 150 lb. class requirements.
- YES 6. Flanges and fittings meet ANSI B16 125 lb. (for cast iron and non-ferrous materials) or 150 lb. class (for steel and malleable iron) requirements.
- YES 7. Valves and piping components of low melting point or non-ductile materials (i.e., brass, bronze, aluminum, plastic, rubber, and cast iron) located within containment areas meeting 40 CFR 264.193 requirements.
- YES 8. Tank connections below the liquid level through which liquid can normally flow provided with an internal emergency shut-off valve (with fusible link) and a manual valve close to the tank.
- YES 9. Tank connections below the liquid level through which liquid does not normally flow provided with a liquid-tight plug or blind.
- <u>N/A</u> 10. Used solvent tank fill line drop-tube provided with vacuum breaker in line external to tank and/or hole in top of drop-tube inside of tank to prevent siphoning of liquid from tank.

91-208-1 B-11

PIPING, VALVES, AND FITTINGS

NFPA 30-1990 Compliance Checklist

for Safety-Kleen Corp. Aboveground Tank Systems

(Continued)

Branch Location: Boynton Beach, Florida Review By: TFT Date: 10/31/91

Tank fill and emptying connections (i.e., tank truck connections) are:

SEE

NOTE

- <u>1</u> 11. outside of buildings in a location free of ignition sources;
- YES 12. not less than five feet from any building opening;
- YES 13. furnished with provisions for liquid-tight closure when not in use (i.e., valve and hose connection cap);
- YES 14. properly identified (i.e., marked clean and used);
- YES 15. provided with check valves. (Not required for Antifreeze)
- YES 16. Prior to being placed in service all piping will be hydrostatically tested at 115 psig or pneumatically tested at 85 psig for a minimum of 20 minutes. Pneumatic tests shall include a preliminary check at not more than 25 psig. All piping joints and components shall be examined for leakage during the test.
- YES 17. Exceptions to the above items corrected to comply with NFPA 30 and/or ANSI B31.3 specifications.

Safety-Kleen piping, valves and fittings in compliance with this checklist will meet the requirements of NFPA 30 - 1990, as well as Article 79 of the Uniform Fire Code, 1991 Edition. These components should be checked with other local fire code requirements, which may be more stringent. It should be noted that the used antifreeze liquid in this system is not flammable or combustible.

NOTE 1: Entire system is in a building which is separated from other facility operations and meets all location requirements.

91-208-1

APPENDIX C Description of Waste

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P

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91-208-1

<u>APPENDIX C</u>

Description of Waste

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Composition of Waste		•	•	•	•	•	•	•	•	•	•		•	•	•	•	•	•		•		C-2
Compatibility Letter from	1	Sa	fe	ety	- k	(le	eer	1			•					•	•	•				C-3

91-208-1 C-1

CHARACTERISTICS OF WASTE

The used antifreeze is collected from customers in 3,500-gallon tanker trucks and transferred from the tanker truck to the used antifreeze tank in the tank farm of the center. Periodically, trucks are dispatched from recycling centers to evacuate the tank.

Used antifreeze is considered to be toxic according to characteristic leaching procedure standards (D004-D011, D018, D019, D021-D030 and D032-D043). A typical composition, and chemical physical analysis is attached.

A letter from Safety-Kleen addressing compatibility of used antifreeze with system components is attached.

Antifreeze Wastes

91-208-1 C-2

		Parameter <i>Nog. Llint</i> t	pH <2 or >10	SG na	FP < 100	∧s 5	Ba 100	Cd 1	Čr 5	Pb 5	Hg 0.2	So 1	Ag 5 -
Ĩ,AŬ	SITE												
W	-110	• • • • • • • • • • • • • • • • • • • •	7.5	1,04	> 200	< 0.05	< 0.3	< 0.05	< 0.05	0.3	< 0.01	< 0.05	< 0.05
W	<i>l:l</i> .		8	1.13	> 200	< 0.05	0.3	< 0.05	< 0.05	< 0.1	< 0.01	< 0.05	< 0.05
W	WL.		8.5	1.05	> 200	< 0.05	< 0.3	< 0.05	< 0.05	0.2	< 0.01	< 0.05	< 0.05

Physical Proportios and TCLP Metals Analysis, ppm

TCLP Semi Volatiles Analysis, ppm

	Paramotor	crosol -	2.4-DNT	ClG-bonz Cl	16–13-but	ClG-oth	nltrobonz C	15-phonol	pyildino	2.4.5-1CP	2.4.6-1CP	
	Neg. Limit	200	0.13	0,13	0.5	3	2	100	5	400	2	
LAU	SITE						•					
W	DU	< 0.04	< 0.04	< 0.04	< 0.04	< 0.04	< 0.04	< 0.2	< 0.2	< 0.04	< 0.04	
11	EL.	0.2	< 0.07	< 0.07	< 0.07	< 0.07	< 0.07	< 0.35	< 0.35	< 0.07	< 0.07	
IV	WL.	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.25	< 0.25	< 0.05	< 0.05	

TCLP Volatilos Analysis, ppm

		Paramotor <i>Nøg. Limit</i>	bonzona 0.5	CC14 0.5	Clbonz 100	CĮ ICI3 6	1.4-DCIU 7.5	1.2-DCA 0.5	1.1-DCE 0.7	МЕК 200	PCE 0.7	ТСЕ 0.5	VChlorida 0.2
LAD	SHE	Ē						•					
iv	nu		< 0,10	< 0,10	< 0,10	< 0.10	< 0.10	< 0,10	< 0,10	< 2.0	0,13	0.97	< 0.20
W	11.		0.32	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 2.0	0.12	< 0,10	< 0.20
W	WI,		< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	· < 0,10	< 0.10	< 2.0	0.51	< 0.10	< 0.10

SAFETY-KLEEN CORPORATION

FAX TRANSMITTAL SHEET

DATE: April 4, 1991

:

FROM: PAUL DITTMAR SAFETY-KLEEN CORP. TECHNICAL CENTER P.O. BOX 92050 ELK GROVE VILLAGE, IL 60009-2050 PHONE: (312)694-2700 FAX: (312)694-2733

TO: BOB SPEAK

LOCATION: TERA CORP.

FAX NO.: (713)981-7713

NUMBER OF PAGES, INCLUDING TRANSMITTAL SHEET: 1

SUBJECT: MATERIAL OF CONSTRUCTION FOR WASTE OIL AND SPENT ANTIFREEZE

According to Breslube's Vice President of Engineering, Glenn Casbourne. carbon steel is used now for waste oil tanks. For the record, he confirms that carbon steel is the material of choice for both waste oil and spent antifreeze.

· • • .

Regards,

Paul Dittmar, Manager of Process and Product Development

cc: Glenn Casbourne

file: MC91047

91-208-1

APPENDIX D Inspection Records

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91-208-1

APPENDIX D

Inspection Records

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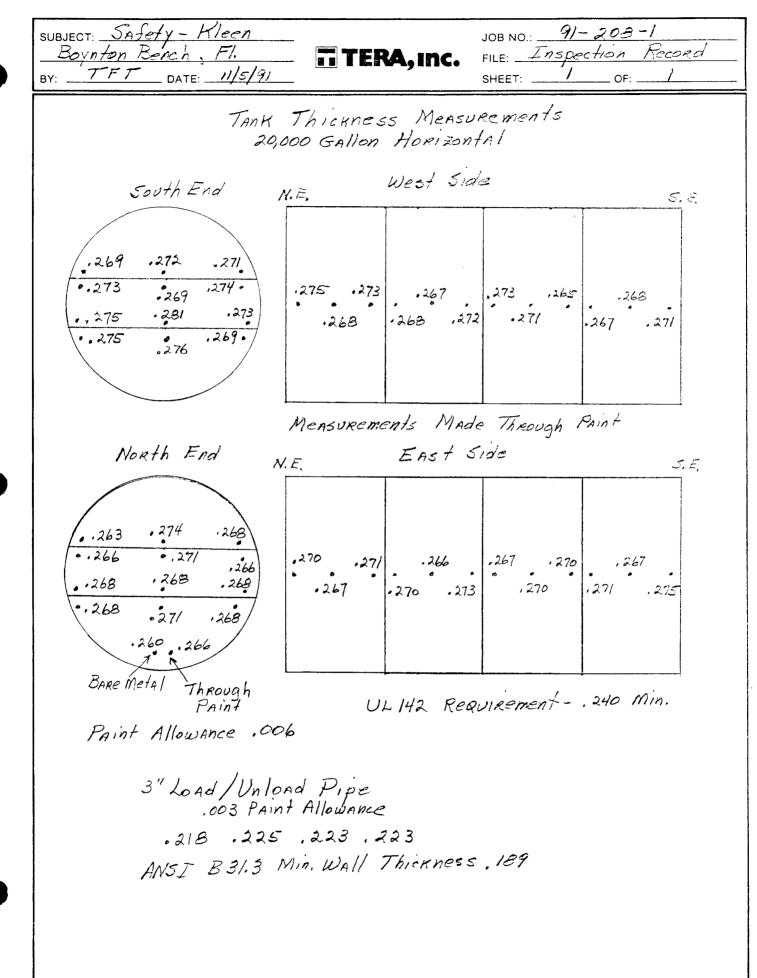
6

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New Containment Inspection Record		D-3
Tank & Pipe Leak Test Report - Ques Tec Corp		D-4
Photographs		D-7



TERA, Inc.

NEW TANK INSPECTION RECORD

			Sheet:	l of l				
CLIENT:	Safety-Kleen Corp	•	Job No.: 91	-208-1				
PLANT LOCATION	I: Boynton Beach, Fl	orida	Date: 10	/31/91				
TYPE INSPECTIC	DN: Interior/Exterior		By:	TFT				
ITEM NO.:	CODE: UL 1	42	YEAR BUILT:	1990				
SERVICE: Us	sed Antifreeze Storage							
CAPACITY: 20),000 gal TANK/DR	UM TYPE: Horizont	al integral s	addles				
DIAMETER: 12	feet LENGT	H: 24 feet						
	END HEAD	<u>SHELL</u>	FLOOR	JACKET				
MATERIALS:	Mild Steel	Mild Steel	N/A	N/A				
SHELL CONDITIC	ON:	Satisfactory						
END HEAD CONDI	TION:	Satisfactory						
FLOOR CONDITIC)N:	N/A						
JACKET CONDITI	ION:	N/A						
SUPPORT TYPE:		Three (3) integra	l saddles					
FOUNDATION TYP	PE/CONDITION:	Reinforced concre	te/satisfacto	ry				
INTERNAL STRUC	CTURE CONDITION:	Satisfactory						
WELDED/FLANGED) JOINT CONDITION:	Satisfactory						
NOZZLE CONDITI	ION:	3" normal vent -	satisfactory					
LINING/COATING	G CONDITION:	Exterior paint -	satisfactory					
INSULATION CON	NDITION:	N/A						
SIGNS OF CRACK	<s:< td=""><td colspan="7">None</td></s:<>	None						
SIGNS OF PUNCT	TURES:	None						
SIGNS OF COATI	ING DAMAGE:	None						
SIGNS OF CRACK	KS OR MATERIAL DAMAGE:	None						
SIGNS OF CORRO	DSION:	None						
SIGNS OF OTHER	R STRUCTURAL DAMAGE OR	PROBLEMS: None						
TIGHTNESS TEST	I? No TYPE:		RE	SULTS:				
OPERATING CONE	DITIONS: MAX TEMP: A	mb. MAX PRESS:	Amb VAC: N	/A				
REFERENCE INSP		entation on tank a ng from Donegan's I Appendix.						

COMMENTS: This tank system was originally installed as a used oil system. The use was changed to used antifreeze before the system was put into service. The system is still not in service until certification is received. The tank is new and has been installed with no internal or external damage visible by inspection.

D-2

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P

TERA, Inc.

				Sheet:	1 of 1
CLIENT: S	Safety-Kleer	n Corp.		Job No.:	91-208-1
PLANT LOCATION: E	Boynton Beac	ch, Florida		Date:	11/1/91
TYPE:	Vault			By:	TFT
LEAK DETECTION TYPE	2: Visual	L		YEAR BU	ILT: 1990
SERVICE: Used Ar	ntifreeze St	corage			
CAPACITY: 50,000	gal.	LARGEST	TANK CAPACI	TY: 20,0	00 gallon
	ROOF/1	COP HD.	WALL/SHELL	FLO	<u>OR</u>
CONSTRUCTION MATLS:	: Masoni	ry Building	RC	R	.C
INTERIOR COATING/LI	INING OF CON	NTAINMENT:	Sikagard-62		
EXTERIOR COATING/LI	[NING OF PR]	IMARY CONTAI	NMENT: Paint		
JOINT TREATMENTS:		Sikaflex-1A			
ROOF/TOP HEAD CONDI	ITION:	Satisfactor	У		
WALL/SHELL CONDITION	ON:	Satisfactor	У		
FLOOR CONDITION:		Satisfactor	У		
SUPPORT TYPE:		Slab on gra	de		
FOUNDATION CONDITIO	ON:	Satisfactor	У		
INTERNAL STRUCTURE	CONDITION:	Satisfactor	У		
JOINT CONDITION:		Satisfactor	У		
LINING/COATING CON	DITION:	Small areas	of flaking	coating	
LIQUID REMOVAL METH	HOD:	Sump - hand	pump or tru	ck pump	
SIGNS OF CRACKS:		None			
SIGNS OF PUNCTURES	:	None			
SIGNS OF COATING DA	AMAGE:	Small areas	of flaking	coating	
SIGNS OF CRACKS OR	MATERIAL DA	AMAGE:	None		
SIGNS OF CORROSION	:	None			
SIGNS OF OTHER STRU	JCTURAL DAMA	AGE OR PROBL	.EMS: None		
OPERATING CONDITION	NS: MAX TI	EMP: Amb.	MAX PRESS:	Atm. V	AC: No
REFERENCE INSPECTION	ON RECORDS:	None			
COMMENTS: This is	s a new faci	lity with th	e tank farm b	eing the f	Toundation
of its	own masonr	y building.	Only minor	coating to	ouch-up is
require	ed on a few	areas of the	e base where	coating ha	ns lifted.

D-3

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WOW

P02

D-4

Donegan's Plumbing Service, Inc.

1845 S.W. FOURTH AVENUE, A-12 • DELRAY BEACH, FLORIDA 33444 • (407) 276-1942

TO: TOM TROLLER TERA COMPANY

FROM: DAN DONEGAN

NOVEMBER 14, 1991 DATE:

RE: SAFETY KLEEN SERVICE CENTER TANKACE QUANTUM PARK - 5610 ALPHA DRIVE; BOYNTON BEACH, FL NO VEO USEO FREEEEE

PER OUR PHONE CONVERSATION OF NOVEMBER 13, 1991:

DONEGAN'S PLUMBING PRESSURE TESTED TANK NUMBER TWO (USED OIL)' WITH THREE TO FIVE POUNDS AIR PRESSURE ON SEPTEMBER 10, 1990. THIS WAS INSPECTED AND APPROVED BY THE CITY OF BOYNTON BEACH ON SEPTEMBER 11, 1990.

SHORTLY THEREAFTER, PIPING FOR TANK FARM WAS AIR TESTED AND APPROVED.

I AM SENDING A COPY OF BOYNTON BEACH PERMIT WITH OUR NOTATIONS OF INSPECTIONS CALLED AND COMPUTER READ-OUT OF BOYNTON BEACH INSPECTIONS AND APPROVALS.

THIS INFORMATION WILL BE FAXED AND HARD COPIES WILL FOLLOW IN MAIL.

PLEASE DO NOT HESITATE TO CONTACT ME IF I CAN BE OF FURTHER SERVICE.

DANIEL M. DONEGAN

			an a			
PROPERTY ADDRESS: 005400 ALPHA DESCRIPTION BIANCE AP PENNIT COMMUNES: 005400 ALPHA DESCRIPTION RESULT PENNIT TESULE INSPECTATION TESTICE AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT TESTICE IN A T E INSPECTATION RESULT AP PENNIT AC INTERVIEW RESULT AP PENNIT AC INTERVIEW RESULT AP PENNIT AC INTERVIEW RESULT AP PENNIT AND A T A T E INSPECTATION RESULT AP PENNIT AND A T A T E INSPECTATION RESULT AND A T A T E INSPECTATION RESULT AP PENNIT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT AND A T A T A T E INSPECTATION RESULT. T A T A T A T E INSPECTATION RESULTS AND A T A T A T A T E INSPECTATION RESULTS AND A T A T A T A T E INSPECTATION RESULTS AND A T A T A T A T A T E INSPECTATION RESULTS AND A T A T A T A T A T A T A T A T A T A	,					
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<pre>PERMIT COMMINE :: '00 00001C: 000 000 PROPERTY ADDRESS: 05410 ALPHA DER APPLICATION THE: PLEULINERG BATE INSP DESCRIPTION RESULT PLOG 0000 007/11/20 CDP SEE COMMENTS BELOW AF CALL PLESSUE& St PLOG 0000 007/11/20 CDP SEE COMMENTS BELOW AF CALL TANK #2 PLOG 0000 00/11/20 CDP SEE COMMENTS BELOW AF PLOG 0000 00/11/20 BLB 200 PSI FRESSURE TES AF PLOG 0000 00/11/20 BLB 200 PSI FRESSURE TES AF PLOT 0000 00/11/20 BLP 200 PSI FRESSURE TES AF PLOT 0000 00/11/20 BLP 200 PSI FRESSURE TES AF PLOT 0001 00/11/20 BLP 200 PSI FRESSURE TES AF PLOT 0001 00/11/20 CDP FINGE HERE DOPENSING TES AF PLOT 0001 00/11/20 BLP 200 PSI PRESSURE TES AF PLOT 0001 00/10/10/10/10/10/10/10/10/10/10/10/10/1</pre>	きょうじ しんれいせい たらう きたか 読み ちゃしきやすう	化可含化物 医胆管切开术 医喉 医马耳 网络 有限 化氯化合物	コーキア ピューション いちが たてはくい みとう りょうく	이 잘 것 거 봐야? 고향 이 생 것 이 지수가 잘 안 가지요? 그는 것이 가지? 이 것 같아요?		
PROPERTY ADDRESS: 05410 ALPHA UK APPLICATION TYPE: PLUNBING PENNIT: ISSUEL INSPITYPE 014 T.E. INSPITYPE APPLICATION RECULT PLOG 0000 07/11790 CDP SEE COMMENTS BELOW APPLICATION INFSTUEL PLOG 0000 07/11790 CDP SEE COMMENTS BELOW APPLICATION INFSTUEL PLOG 0000 07/11790 CDP SEE COMMENTS BELOW APPLICATION INF PLOG 0000 07/11790 BLR 200 PSI PRESSURE TES APPLICATION INF PLOF 0001 09/11/200 BLR 200 PSI PRESSURE TES APPLICATION INF PLOF 0002 07/12790 BLR 200 PSI PRESSURE TES APPLICATION INF PLOF 0002 07/12790 BLR 200 PSI PRESSURE TES APPLICATION INF PLOF 0002 07/12790 BLR 200 PSI PRESSURE TES APPLICATION INF PLOF 0002 03/11/91 COP FINAL 200 PSI PRESSURE TES APPLICATION INF PLOF 0002 03/11/91 COP FINAL 200 PSI PRESSURE TES APPLICATION INF PLOF 0002 03/11/91 COP FINAL 200 PSI PRESSURE TES APPLICATION INF PLOF 0002 03/11/91 COP FINAL 200 PSI PRESSURE TES APPLICATION INF PLOF 0002 03/11/91 COP FINAL APPLICATION APPLICATION INF PLOF 0002 03/11/91 COP FINAL APPLICATION APPLICATION APPLICATION INF PLOF 0002 03/11/91 COP FINAL APPLICATION APPLICATI	2 2 2	FERDI	AULENT YTEVETON T		8 ; 47; 5 4	
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FLO3 0000 09/07/20 CDF FIRST REUSH FLUMEING AF PL07 0000 09/18/200 BLB 200 PSI PRESSURE TES AF PL07 0002 09/18/200 BL 200 PSI PRESSURE TES AF PL07 0003 02/26/201 BL 200 PSI PRESSURE TES AF PL07 1001 05/14/200 BL 200 PSI PRESSURE TES AC PL07 1001 05/14/20 CDP 200 PSI PRESSURE TES AF PL07 1001 05/14/20 CDP 200 PSI PRESSURE TES AF PL07 1001 05/14/20 CDP 200 PSI PRESSURE TES AF PL07 0002 03/12/200 PFL PRESSURE TES AF PL07 1001 05/14/20 CDP 200 PSI PRESSURE TES AF PL07 0002 03/12/200 PFL PRESSURE TES AF PL07 0002 03/12/200 PFL PRESSURE TES AF PL07 0002 03/12/201 CDP 700 PRESSURE TES AF PL07 0002 03/12/201 CDP 700 PRESSURE TES AF PL07 0002 03/12/201 CDP 700 PRESSURE TES AF PL07 0002 PRESSURE TES AF PRESSURE TES AF PRESSURE TES AF PRESSURE TES AF PRESSURE TES AF	FL: 09.04796/		とからかたがた 知識 おおおん あるくがわ あかみかい		SPEC AF EATA PRESSL	JP & 21-
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TANK FARM BUILDING



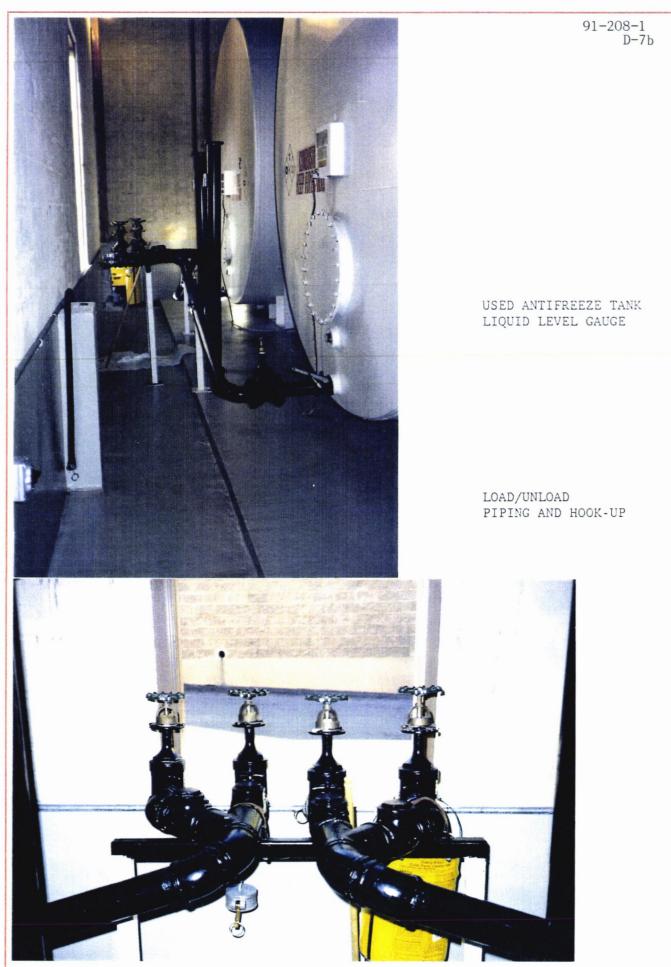
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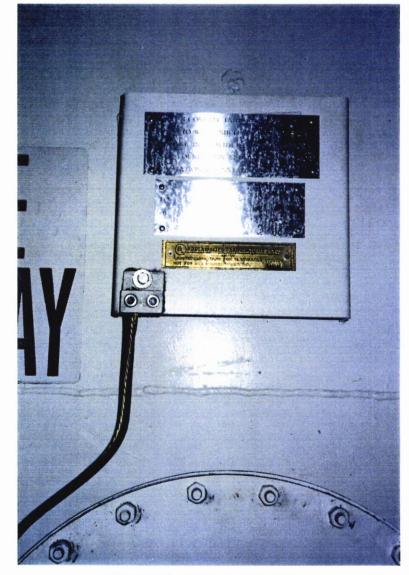
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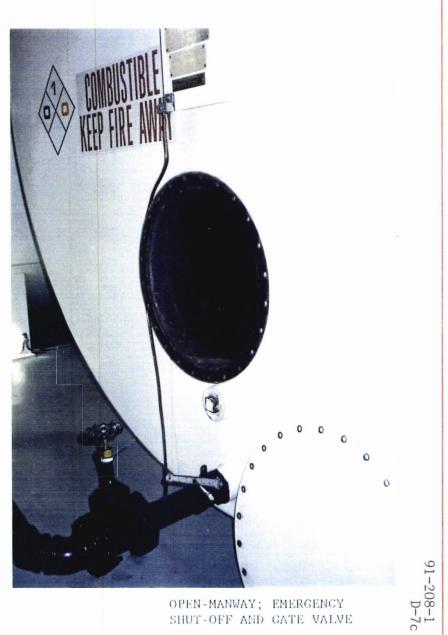
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____ TERA, INC. -



USED ANTIFREEZE TANK NAMEPLATE



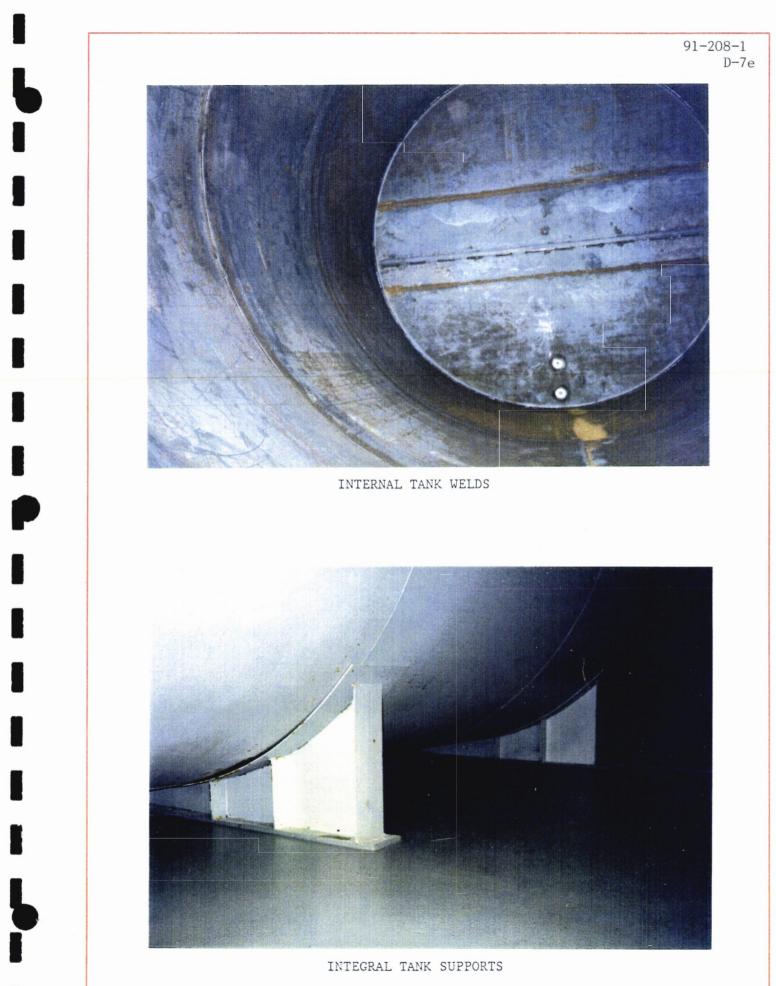
OPEN-MANWAY; EMERGENCY SHUT-OFF AND GATE VALVE



USED ANTIFREEZE TANK

NORMAL 3" VENT

HIGH LEVEL ALARM;LIQUID LEVEL GAUGE; EMERGENCY VENT (MANWAY W/LOOSE BOLTS) 91-208-1 D-7d



- TERA, INC. -

ATTACHMENT II.C.2

TANK SYSTEM SPECIFICATIONS

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ATTACHMENT II.C.2 TANK SYSTEM SPECIFICATIONS

The facility includes five aboveground steel tanks (Figure II.C.2-1). Used mineral spirits contained in drums returned by the customers are transferred via the wet dumpster into a 15,000-gallon tank, awaiting bulk shipment to the recycle center. The spent antifreeze is transferred from a tanker truck into a 20,000-gallon tank. The other three tanks consist of one 15,000-gallon mineral spirits product tank, one 20,000-gallon nonhazardous waste oil tank, and one 5,000-gallon dry cleaning product tank. These three tanks are not considered RCRA tanks.

MATERIAL COMPATIBILITY

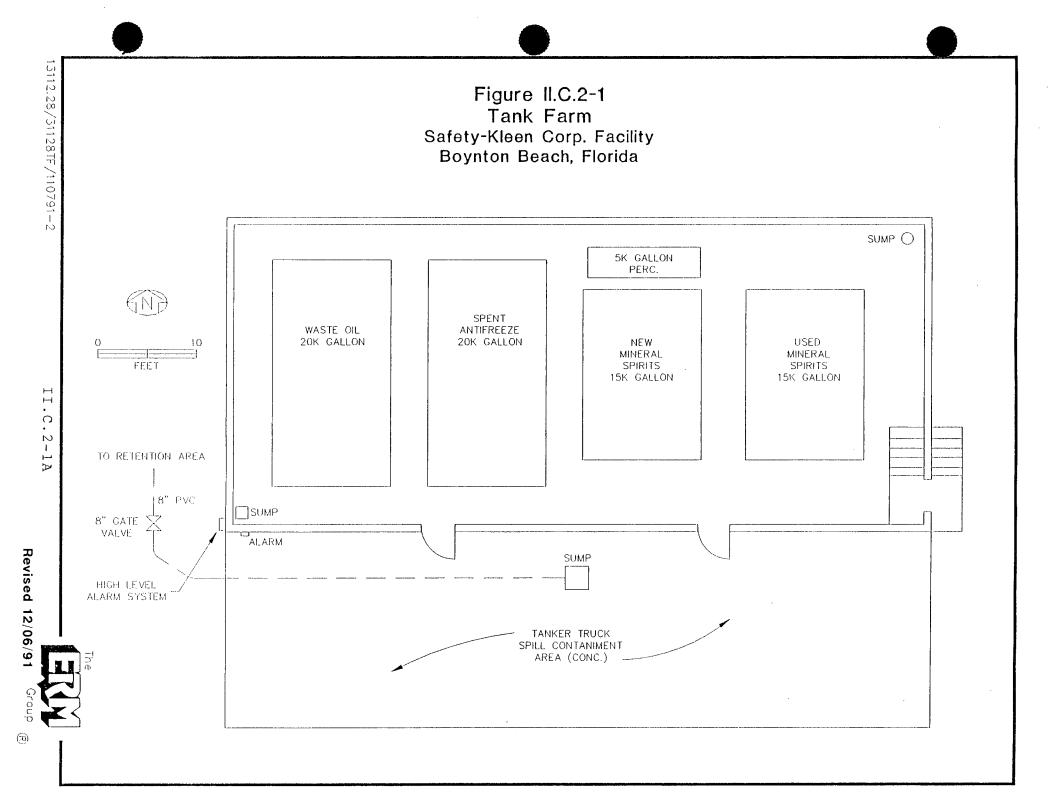
Mineral spirits (petroleum naphtha) is compatible with the mild steel tank structure; in fact, mineral spirits are often used as a light hydrocarbon coating to prevent rusting of metal parts. As with all petroleum storage vessels, water will accumulate over time due to condensation. The mineral spirits has a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the mineral spirits/water interface. Experience, however, has shown that the corrosion potential at the interface is minimal when compared to the potential for corrosion and no separate water plume will form in this tank.

TANK DESIGN AND OPERATION PROCEDURES

Spent mineral spirits from parts washers is accumulated in the 15,000-gallon aboveground storage tank by transfer through the return and fill station. Containers are poured into the dumpsters (barrel washers) in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill station has secondary containment.



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The barrel washers are located within the mineral spirits return and fill shelters. The return/fill shelters have been coated with Sikagard[®] 62. When recoating is required in the future, it will be performed using Semstone[®] 140 or equivalent. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detail information on the barrel washers.

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

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used mineral spirits storage tank. There is a basket in the sump that collects sludge. Approximately twice a day, this basket is removed and sludge is removed and placed into a sludge drum for recycle.

The barrel washer is a totally enclosed unit. A small amount of mist is generated while operating the unit. This is controlled by closing the lid of the unit. Spent antifreeze is transferred from a tanker truck into the bulk tank.

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are shown in Figures II.C.2-4(a) and II.C.2-4(b). All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high-level alarms. The design and installation of the tank alarm system is shown in Figures II.C.2-5(a) through II.C.2-5(d). The tank seams are lapped with full fillet welds.



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Revision 2 - 12/06/91

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The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer). All tanks are new and unused.

Attachment II.C.1 provides an independent assessment of the tank system. The mineral spirits assessment by Wishmeier & Associates includes a detailed description of the tank system components and operation. The assessment of the ethylene glycol tank was prepared by TERA, Inc. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 71' x 32'4" x 6" concrete slab, surrounded by a 36" concrete dike and are in an enclosed building. The dike has been sealed with a chemical resistant coating. Therefore, no surface run-on or precipitation would be in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. Gauges are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) will signal the tank's being 95 percent full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank must be read before filling and before and during the filling of a tanker truck (the available volume of which must be noted prior to emptying the tank) to prevent overfilling of the truck. A suction pump equipped with the tanker truck is used to withdraw used mineral spirits from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station must be cleaned within 24 hours of a spill. The used mineral spirits tank may be operated at a maximum volume of 14, 250 gallons (95 percent). The spent antifreeze tank may be operated at a maximum volume of 19,000 gallons (95 percent).



II.C.2-3

Material which collects in the tank dike and return/fill station can be removed using a "wet/dry" vacuum, sorbents, or mop.

"No smoking" signs are posted on the entrance to the tank farm and return/fill station.



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TECHNICAL BULLETIN Man IC 2088

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DESCRIPTION AND USES:

SEMSTONE 140 is Sentry's primary epoxy floor topping system for concrete. Self-priming and semi-leveling, it will typically be aggregate filled and spray applied to yield an economical and highly serviceable floor for areas subject to harsh chemical exposure.

SEMSTONE 140 is a two component system that possesses the following characteristics in common with all members of Sentry's 140 family of products:

- excellent resistance to:
 - + chemical attack;
 - thermal shock:
 - wear and impact.
- superior bonding qualities;
- high cohesive strength, coupled with the flexibility necessary to resist cracking;
- low permeability;
- low odor;
- 100 % solids.

Example uses include:

- Process slabs
- Tank farm floors
- Chemical loading and unloading areas
- Spill containment areas
- Waste proof coating for secondary containment systems

PACKAGING/COVERAGE:

SEMSTONE 140 is available in 1 gallon and 5 gallon units. Each unit consists of a premeasured Part A component and a premeasured Part B component.

Coverage rates are effected by the condition of the surface being coated. The following are theoretical coverage rates:

> 32 sq. ft. per gallon at 50 mils. 12.8 sq. ft. per gallon at 125 mils.

Coverage can be increased by up to 100% when extended with silica aggregate. (See paragrach 3 of the application guidelines under MIXING AND APPLICATION.)

Application thickness depends upon expected service conditions. Consult Sentry Polymers or your local representative for specific recommendetions.



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SEMSTONE® 140

Sprayable Epoxy Floor Topping

TYPICAL PROPERTIES - WET:

Solids, by Volume	100%
	9.3 ibs
Pot Life @ 75°F	43 - 60 minutes
	(significantly less at elevated temperatures)
Cure Time @ 75°F:	
Foot Traffic	12 hrs.
Light Venicular Traffic	24 hrs.
	36 hrs.
	Not Required
Nonflammabie	

TYPICAL PROPERTIES - CURED:

	Light Gray (s	elected other colors available)
Hardness	. ASTM D - 2240 Shi	ors D 70 - 75
Compressive Strength	ASTM C - 579	<u>14,000 psi</u>
Tensile Strength	ASTM D - 638	5,000 psi
Tensile Elongation	ASTM D - 638	8%
Flexural Strength	ASTM D . 790	11.000 psi
Fiexural Modulus		
of Elasticity	. ASTM C - 722	_ Complies with Epoxy Type B
Abrasion Resistance	. ASTM D - 1044	55 mg
•		(CS17 wheels)
Water Vacor Transmission	ASTM E - 96	
	WVT	
		0.6042 permin.

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RELATED AND ANCILLARY PRODUCTS:

SEMSTONE 140 - S Epoxy Coating and Lining SEMSTONE 140 - SL Epoxy Self-Leveling Floor Coating SEMSTONE 140 - CT Epoxy Floor Coating - Cold Temperature Formulation SEMSTONE 300 Epoxy Polymer Concrete SEMSTONE 500 Epoxy Putty SEM-CRETE Rapid Hardening Underlayment Mortar SEMSTONE Scrim

Refer to separate technical bulletin on each product for uses, application instructions, etc.

STORAGE AND SHELF LIFE:

X440 SEMSTONE 140 components tightly sealed in their original containers until ready for use. Store at 50° - 73°F, out of direct sunlight. Property stored, SEM-STONE 140, has a minimum shelf life of one year.

Refer to patch number on lacel for date of manufacture.

CHEMICAL RESISTANCE GUIDE

This guide is intended as an aid in determining the potential usefulness of SEMSTONE 140 as a protective barrier against memical exposure. Each application should be evaluated according to its particular diroumstances and conditions.



XEY: 1 = Suitable for constant immersion

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2 a Suitable for snorrer term containment and continual suillage 3 a Suitable for intermittent spills when followed promoty with water flushing

NR = Not recommended

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C = Consuit Senuy Polymers

	RATING		RATING		RATIN
Acetic Acid. 10%	2	Com Cil	1	Naphthalene	:
Acetic Acid. 30%	3	Cruce Cil. Sour	4	Nitric Acid. 5%	3
Acstic Acid. Glacial	3	Cruce Cil. Sweet	1	Nitrie Acid. 30%	NE
Acetore	NR	Cyclohexana	3	Nitric Acid. 30%	NR
Acritic Acid. up to 25%	NR	Cyclonexanoi	3	Niche Acid/Suifurie Acid	NR
Acrylontrile	NR	Cyclohexanone	3	Nitropenzene	. NR
Alum		Dichlorobenzene	NR	n-Coon Alconol	:
(Aumnum Potassium Sulfate)	1	Diesei fvel	1	Cils	:
Aluminum Chicrice	1	Diestyl Benzene	NR	Cleam	SF.
	÷.	Ethyl Aconol	2	Clerc Acid	3
Alumínum Aucride	<u>+</u>	Ethi Banzane	NR	Cxaile Acid	
Aluminum Hydroxide	÷.	Ethy Chloride	NR	Ferchloroethylane	6) (1) (1)
Aluminum Nitrate	÷.		NR	Perchicric Acid	NE.
Auminum Sulfate	1	Elinione Dichloride		Phenoi	15
Ammoni#	7	Ethylena Glycol	1		10
Ammonium Bisuffite	I	Fatty Acids		Phosphone Acid. 50%	
Ammonium Chloride	1	Ferric Chloride	1	Phosphoric Acid. 85%	4 3
Ammonium Hydroxide	1	Ferric Nitrate	ĩ	Phosphorous Acid	÷.
Anmonium Nitrate	*	Ferric Sulfate	1	Potassium Carbonate	+
Ammonium Sulfate	1	Ferrous Chieride	1	Potassium Chloride	1
n Annyi Alcohoi	NR	Fiucsilleic Acid	2,0	Potassium Cienremate	2
Anitine	NR	Formaldehyde	1	Potassium Hydroxide	-
Barium Chloride	1	Formic Acid	. 3	Potessium Nitrate	1
Barium Hydroxide	1	Fuel Qi	1	Progionic Acid	. 2
Barium Sulfate	. 1	Gasofine	1.	Silver Nitrate	1
Sarium Sulfice	Ĩ	Glycerine	1.	Socium Acetate	11
Bentena	2	Heptane	1	Scolum Bloarbonate	:
Benzene Sulfonic Acid	1	Hexane	1	Sodium Bisulfate	. 1
Senzoic Acid	1	Hydrobramic Acid	2	Scalum Bisuifite	1
Black Liguer, Pulp Mill	2	Hydrochloric Acid, 15%	1	Sodium Çarbonate	:
Bleach Liquer, Pulo Mill	-	Hydrochlaric Acid, 37%	2	Sodium Chloride	:
Boric Acid	1	Hydrofluoric Acid	C	Socium Chiente	NF
Erine	1	Hydrogen Peroxide	2	Secium Hydroxide. 10%	:
Bremine, Liquid	NR	Hydrogen Sulfide	1	Socium Hydroxide, 50%	:
Bromine Gas (Dry & Wet)	NR	Iscereovi Alcohol	1	Sodium Hypochlerite	2.0
a-Butyl Alconot	2	Jet Fuel	1	Socium Suifate	:
But Cellosowe Solvent	ŝ	Kercsene	1	Sodium Sulfide	:
n-Subric Acid	NR	Lactic Acid	2	Stannic Chloride	*
Cacmium Chloride	1	Lauryl Chloride	1	Stannous Chience	
Calcium Chloride		Last Acetate	1	Stearic Acid	
Calcium Hydroxide		Linseed Cil	2	Styrene	
Calcium Hygochlants	2.0	- Littium Bromida	-	Sugar/Sucrose	
Calcium Nitrate	1	Lithium Chieride	1	Sulfur Dioxice	
Calcum Sulfate	1	Lithium Hypochlants	2.0	Sulfunic Acid. 10%	
Calcium Sulfite	1	Uthium Hydroxide	1	Sulfuric Acid, 50%	
Carbon Dioxide Gas	1	Mænesium Bisulfite	-	Sulturie Acid. 98%	N
Carpon Dissuifice	NR	Magnesium Carbonate		Tall Cil	
Carpon Tetrachloride	NR	Magnesium Chieride	•	Tannic Acid	
	. 3	Magnesium Mydroxide	-	Tarrano Acid	
		Magnesium Suifate	-	foluene	
Chiorine Gas (Dry & Wot)	3 4	Maleic Acid		Toluane Sulforne Acid	
Chiorine Water			-	Tricniensestie Acid	
Ghiorobenz zne	NR	Marcuric Chloride Marcurous Chloride			
Cherciam Chromic Aug. 15%	<u>אא</u> 3	Mercurous Chionica Merchy Alconol	-	Topodium Phosphate	
Chromic Adid, 13%	e 7	Mettyl Chlorde	NR	URB	
Cime Acid	÷	Methylene Chicride	NB	Water, Dekonized	
Correy Chlanda	-	Methylene Unicitie	NR	Water, Comineralized	
	-	Mineral Scints	2	Water, Distilled	
Copper Cyanica Copper Nitrate	-	Menochierozostic Acid	-	Xviene	
Copper Guifate	-	Munate Ade	-	Zine Chieride	
	-	Naontha	-	Ine Sufate	



APPLICATION GUIDELINES

TEMPERATURE CONSIDERATIONS

 The temperature of the surface to be coated, and the ambient air temperature should be at least 50° F while aboiying SEMSTONE 140 and while it cures.

In general, we recommend against applying SEM-STONE 140 if the temperature is expected to drop below 50°F. Instead, use SEMSTONE 140-07.

 Twent/-four hours before application, all materials (components A and B. aggregate, etc.) should be stored at a 70° - 85°F, to facilitate handling.

SURFACE PREPARATION - GENERAL

Surfaces must be dry and free of dirt, dust, oil, grease, chemicals and other contaminants immediately prior to applying each cost of SEMSTONE 140.

URFACE PREPARATION OF CONCRETE

 New concrete generally should be cursd a minimum of 28 days.

NOTE: Check with Sentry Polymers for racommendations regarding concrete cured less than 28 days.

- 2. Conditions must be structurally sound and must not contain any accelerators or curing compounds.
- 3. Remove all oil and grease,

ć.

4. Remove all surface lattance and expose sound concrete.

We recommend abrasive blasting to do this. However, other methods, such as acid stohing and neutrailizing, may be used.

 In general, any existing costing should be comcletely removed.

in certain instances this may not be necessary, but consult with Sentry Polymers first. Always remove coatings which have failed due to lack of adhesion or thermal shock.

- Locate all expansion joints, control joints, floor drains, equipment base plates and mid-floor termination points. Handle them as per Sentry's Construction Details Sheet No. S7-1.
- Degraded concrete on horizontal surfaces should be restored using SEMSTONE 300 Epoxy Polymer Concrete or SEM-CRETE.
- Fill all honeycombs, form voids, etc. in vertical surfaces using SEMSTONE 300 Ecoxy Putty or SEM-CRETE.

SURFACE PREPARATION OF INCIDENTAL STEEL

Equipment base plates, etc. to be coated along with the concrete should be abrasive blasted to a near white metal finish with a 1 - 2 mil anchor profile. (Ref.SSPC-SP-10)

MASKING

Mask surfaces that are not to be coated. This material is difficult to remove, once applied.

APPLICATION EQUIPMENT

- 1. SEMSTONE 140 may be applied using a spray rig, notched trowal, brush or roller.
- 2. Spraying Aggregata Filed Materiai

We recommend the use of a peristaltic stray rig, such as the Carrousel Pump by Quik Soray, Port Clinton, Ohio.

DO NOT use a plural component or a single component airless rig with aggregate filled material.

Set up the peristantic rig with a 1 inch ID, 15 feet iong material line and a 3 feet pole spray gun.



Prewet the bases by oumping a small amount of mixed SEMSTONE 140 (see paragraphs 1 and 2 under MIXING AND APPLICATION) without aggregate through the lines and pole gun: about 1/2 gallon should be sufficient.

3. Soraying Material Without Aggregate

We recommend the use of a plural component or single component airless rig when the material will be sprayed without aggregate. The penstallic rig can also be used.

Plural Component Alness Soray Equipment (Graco Suildog Hydra-Cat or equal):

Set equipment at a 4 to 1 volumetholmix ratio. Use a Graco Silver Gun, or equivalent, equipped with a reversible, self-disaning tip. onfice size .035 - .041 incn.

Single Component Airless Soray Equipment (Graco "King" 45 to 1 Hydro Spray Pump, or equal); set up as follows:

No screens. filters or surge tank.

Spray hose should be 1/2" or 3/4" iD. and a maximum of 30 feet in length.

Use Graco Golden Mastic Gun, or equivalent. equipped with a reversible, self-cleaning tip. crifice size .035 - .041 inch.

Inlet air pressure should be a minimum of 100 psi. Recommended operating pressure is 60 - 100 psi.

- 4. Always use spray equipment in accordance with manufacturer's instructions.
- 5. Care of Soray Rig Hoses

Take care to prevent the mixed material from setting up in your hoses. For best results, keep your hoses as short as possible, burge them immediately ifwork is interrupted, keep them out of direct surright and insulated from not surfaces.

MIXING AND APPLICATION

- The components must be individually agitated inmediately prior to use.
 - Part A Blend each Part A component to a uniform consistency in its individual container. Using a Jiffy type mixer.
 - Part B Stir each Part B component to a Uniform color in its individual container.
- 2. if using a biural component spray rig, skip this step. Otherwise, do this:

Pour the entire contents of Part B into the container holding Part A, and mix thoroughly for two minutes using a lifty type mixer.

The pot life of the mixture will be approximately 45-60 minutes @ 75°F: significantly less time at elevated temperatures.

The longer the material is in the bucket after mixing, the shorter its pot life will be. So, use it immediately.

- SEMSTONE 140 may be extended by adding silica sand. This can provide a more economical floor
 - topping and is also useful when costing rough or mildly eroded concrete.
 - a. Do not add sand to SEMSTONE 140 unless your coating thickness will be at least 75 mils.
 - b. Use only clean, dry, bagged 20/40 mesn round silica sand.
 - c. Pour haif the mixed SEMSTONE 140 into another diean, 5 gailon bucket.
 - Slowly addisend to each bucket while biending with a Jiffy type mixer. Bo both buckets ngit away.
 - e. You may add up to 3 parts, by weight, of sand to 1 part, by weight, of SEMSTONE 140.

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At 2 to 1, you will bottem a stuf flu a mixture en externa poversage by 100%. This waithe potentian mixture for spray approxides. f. The mixture may be sprayed or applied by notched trowei.

If spraying, work the pole gun in a circular motion to achieve an even coating thickness.

- 4. When working a large or congested area, it may be desirable for applicator to wear spiked shoes.
- 5. To obtain a nonskid surface, broadcast your grit media onto the coated surface before the coating jells.
- SEMSTONE 140 is semi-leveling. When used on an area that has a pitch or slope, use a 2 to 1 silica sand mixture (see 3 paragraph above) in order to keep the material from sliding.
- To coat vertical surfaces, we generally recommend our SEMSTONE 140-S Epoxy Coating and Lining system.

However, for convenience, and when service conditions are not rigorous. SEMSTONE 140 may be used to coat short verticals, such as curbs. Multiple costs will probably be required to obtain a coating free of pin holes. We recommend a minimum of three costs. Allow each cost to cure tack free before applying the next coat. Frepare the surface between coats in accordance with paragraph 8.

DO NOT USE AGGREGATE ON VERTICAL SUR-

- 8. Prepare surfaces for intercoat adhesion as follows:
 - a. Allow SEMSTONE 140 to cure until joiled before recoating.
 - b. If the surface curse firm to the touch, but less than 24 hours, it must be washed with soap and water, rinsed and dried before recoating.
 - c. Surfaces cured beyond 24 hours must be washed with scep and water, rinsed, dried and lightly sanded or abrasive blasted.

- 9. If work is interrupted, and at the end of the day, terminate the coating in a straight line.
- As it cures. SEMSTONE 140 will sometimes develop a thin, oily film on its surface.

This film may be easily removed by wasning with soap and water.

CLEANUP -

Eefore it jells, SEMSTONE 140 may be cleaned from tools and equipment using hot, soapy water.

After SEMSTONE 140 jells. Xylene or MEK will be required. Chionnated solvents may be used if flammable solvents are not allowed.

SAFETY PRECAUTIONS

FOR INDUSTRIAL USE ONLY.

- Avoid contact with eyes and skin; do not ingest or inhale.
 - When working with SEMSTONE 140, always wear chemical goggles, rubber gloves, and appropriate work clothing.

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When spraying in a confined area, also wear a fresh air hood and make provision for forced ventilation.

When spraying in an open area, an organic mist respirator can replace the fresh air hood.

Prolonged or repeated exposure to SEMSTONE 140 may cause skin irritation or allergic resctions.

Refer to material safety data sneets regarding individual components.

ATTACHMENT II.C.7

TANK SYSTEM SECONDARY CONTAINMENT



ATTACHMENT II.C.7 TANK SYSTEM SECONDARY CONTAINMENT

TANK CONTAINMENT

All tanks are aboveground, underlain by a 71' x 32'4" x 6" concrete slab, surrounded by a 36" concrete dike and in an enclosed building. The dike has been sealed with a chemical resistant coating. When recoating occurs in the future, the coating used will be Semstone 140 or equivalent. No surface run-on or precipitation would be in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. The layout of the tank storage building is provided in Figure II.C.7-1. Containment calculations are in Figure II.C.7-2.

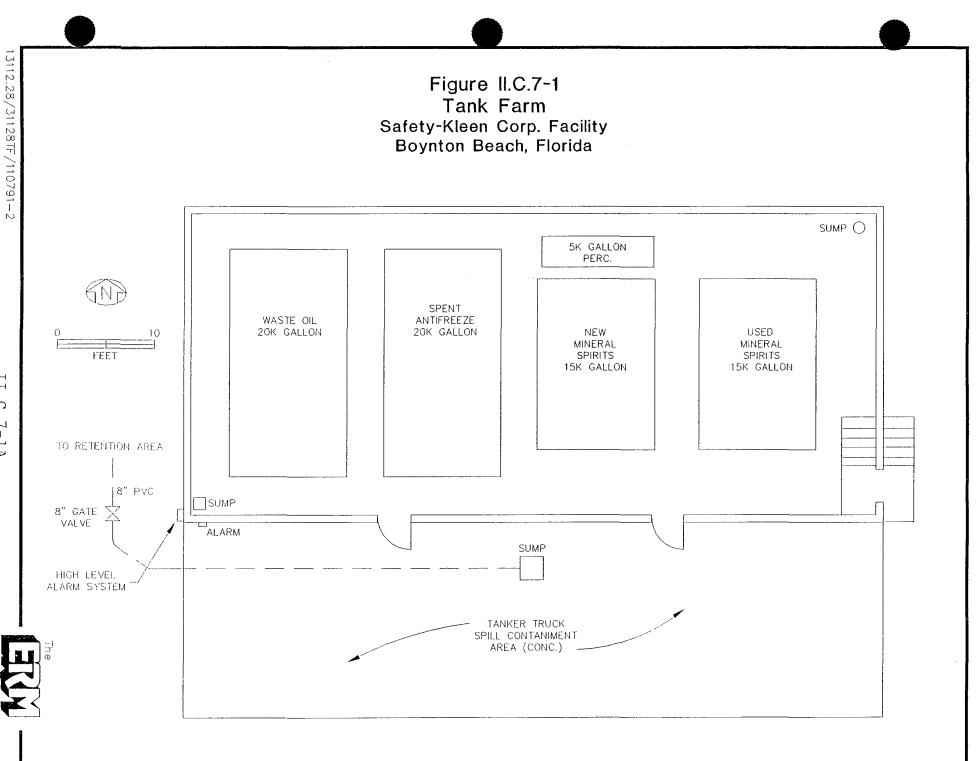
RETURN/FILL CONTAINMENT

The return/fill shelter is located inside the center portion of the main building. The floor is sloped to a containment trench located in the center of the return/fill shelter. The entire area is coated with a chemical resistant coating. The barrel washers are on a raised grating which measures 54'0" x 78'0" (Figure II.C.7-3).

The area is designed such that the route trucks can be backed inside the building and the garage doors shut so that no precipitation can get into the return/fill shelter containment area. The containment capacity for the return/fill area is 3,626 gallons which exceeds the storage capacity of the two dumpsters (275 gallons per dumpster). The containment calculations are presented in the tank system assessment report (Attachment II.C.1).



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II.C.7-

Revised 12/06/91

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ATTACHMENT II.C.9

CONTROLS AND SPILL PREVENTION



ATTACHMENT II.C.9 CONTROLS AND SPILL PREVENTION

The tank system is designed to minimize the potential for spills and to control any spills which may occur. The tank area prevention and control system includes proper tanks, and containment walls and trenches. The return/fill shelter consists of dumpsters (barrel washers) located inside a containment area.

The prevention and control system minimizes the opportunity for an uncontrolled release of material to the environment.

DESCRIPTION OF FACILITY

The facility utilizes five aboveground steel tanks. Used mineral spirits housed in containers returned by the customers are transferred via the wet dumpster into a 15,000-gallon tank, awaiting bulk shipment to the recycle center. The spent antifreeze is transferred from a tanker truck into the 20,000-gallon tank. The other three tanks consist of one 15,000-gallon mineral spirits product tank, one 20,000-gallon nonhazardous waste oil tank, and one 5,000-gallon dry cleaning product tank. These three tanks are not considered RCRA tanks.

MATERIAL COMPATIBILITY

Mineral spirits (petroleum naphtha) is compatible with the mild steel tank structure. In fact, mineral spirits is often used as a light hydrocarbon coating to prevent rusting of metal parts. As with all petroleum storage vessels, water will accumulate over time due to condensation. The mineral spirits has a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the mineral spirits/water interface. Antifreeze and water are soluble in all proportions and no separate water plume will form in this tank.



Spent mineral spirits from parts washers is accumulated in a 15,000-gallon aboveground storage tank via the return and fill station. Used solvent is returned from customers via containers and poured into the barrel washers. The barrel is then placed on roller brushes contained within the barrel washer. As the machine is turned on, the barrel rotates on the brush and the outside of the barrel is cleaned. There is also a nozzle that sprays a stream of solvent into the bottom of the barrel to clean the inside of the barrel. The machine is turned off and the barrel is removed. The procedure takes approximately five seconds per barrel.

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used mineral spirits storage tank. There is a basket in the sump that collects sludge. Approximately twice a day, this basket is removed and sludge is removed and placed into a sludge container for recycle.

The barrel washer is a totally enclosed unit. A small amount of mist is generated while operating the unit. This is controlled by closing the lid of the unit. The spent antifreeze is transferred from a tanker truck into the bulk tank.

TANKS

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are discussed in Attachment II.C.2. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high levelalarms. The tank seams are lapped with full fillet welds. The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer).



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Attachment II.C.1 provides an independent assessment of the tank systems. This assessment includes a detailed description of the tank systems' components and operation. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 71' x 32'4" x 6" concrete slab, surrounded by a 36" concrete dike and are in an enclosed building. The dike has been sealed with a chemical resistant coating. Therefore, no surface run-on or precipitation would be in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. Gauges are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) will signal the tank's being 95 percent full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank must be read before filling and before and during the filling of a tanker truck (the available volume of which must be noted prior to emptying the tank) to prevent overfilling of the truck. A suction pump equipped with the tanker truck is used to withdraw used mineral spirits from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station must be cleaned within 24 hours of a spill. The used mineral spirits tank may be operated at a maximum volume of 14, 250 gallons (95 percent). The spent antifreeze tank may be operated at a maximum volume of 19,000 gallons (95 percent).

Material which collects in the tank dike and return/fill station can be removed using a "wet/dry" vacuum, sorbents, or mop.

No smoking signs are posted on the entrance to the tank farm and return/fill station.



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ATTACHMENT II.C.12(a)

TANK SYSTEM CLOSURE PLAN

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ATTACHMENT II.C.12(a) TANK SYSTEM CLOSURE PLAN

CLOSURE INTRODUCTION

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. No onsite disposal activity occurs at any plant and hence no disposal capacity will be exhausted that will necessitate closure of a facility. Based on current business and facility conditions, this facility is expected to remain in operation beyond the year 2000.

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

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

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

An anticipated closure schedule can be seen in Figure II.C.12(a)-1. An anticipated maximum waste inventory for the tank system of the facility is presented in the following section.



II.C.12(a)-1

- The dumpsters and the dock area will be cleaned with detergent solution and the rinsate analyzed for mineral spirits, volatile organic compounds, lead, and cadmium to determine the effectiveness of the decontamination. The area will continue to be washed and rinsed until levels are below MCLs, or PQLs if MCLs are not available.
- The rinsing fluids will be discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described Attachment II.C.12(a).
- The cleansed dumpster and dock structure will be reused by Safety-Kleen, or scrapped.
- The cleanup equipment and solutions disposal is the same as that listed earlier.

PHASE I--OPEN THE TANK

- Access to aboveground tanks is obtained by removing manways.
- Prior to opening the tanks, the personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they will be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of the remaining material.



PHASE II--REMOVING WASTE AND CLEANING TANK

- Before removing the waste from the tank, all piping and appurtenant equipment will be flushed first with clean mineral spirits followed by a detergent solution.
- The method to remove the waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sludge as possible.
- Subsequent to vacuuming the majority of the material from the tank, it may be necessary to use a high pressure wash system using a clean solvent and detergent solution to rinse residual material from the walls and bottom of the tanks. The evacuated material and the rinse solution will be returned to the recycle center for reclamation. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of unnecessary material. The final rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium, using SW-846 to determine the effectiveness of decontamination. The tank will continue to be washed and rinsed until levels are below MCLs, or PQLs if MCLs are not available. Rinsate will be removed using a vacuum tanker truck and will be disposed of as hazardous waste. It is anticipated that approximately 2,000 gallons of rinsate will require RCRA disposal.
- Storage tanks are considered confined spaces, i.e., spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur.
- Confined space entry requires special operating procedures:
 - Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.



- Supply valves must be closed and "tagged" and bleeder valves left open, or supply piping should be disconnected.
- Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "OFF."
- On tanks were flammable vapors may be present, all sources of ignition must be removed.
- ► All tanks must be tested for flammable vapors, toxic gases, or oxygen deficiency in that order, as applicable. The results of such tests should be displayed on the job site.
 - In all tank entering situations, an Oxygen Deficiency Test shall be performed prior to tank entry.
 - Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test."
 - In most circumstances, flash tests and oxygen deficiency tests will be performed by the supervisor of the area in which the work is being performed.
 - Under any conditions where a possibility (no matter how remote) of toxic vapors being present in the tank to be entered exists, the supervisor will arrange to have the air tested.



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- There must be a set of wristlets or a rescue harness and sufficient rope at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.
- Workers should wear a rescue harness if entering a tank with a large enough opening to easily effect a rescue. In tanks with small openings, only wristlets may be used. However, in cases where there are agitator shafts, containers, or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the life-line may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- A constant source of fresh air must be provided to ensure a complete change of air every few minutes. In cases of <u>short-term entry</u> for inspection or removal of objects, an air mask is recommended. In cases of <u>long-term entry</u> (generally for repair) the use of an air mover should be considered.
- When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.
- ► Adequate illumination must be provided.
 - A flashlight or other battery-operated light must also be available to provide illumination for safety exit in the event of an electrical power failure.
 - Explosion-proof lighting must be used in any tank used to store flammable liquids.



- All electrical equipment to be used inside the tank must be in good repair and grounded.
- Others working in the immediate area shall be informed of the work being done and they shall inform the watcher or supervisor immediately of any unusual occurrence which may make it necessary to evacuate the tank.
- The "buddy" (standby observer) system:
 - Men working inside a confined space must be under the constant observation of a fully-instructed standby observer.
 - Before anyone enters the tank, the standby observer will be instructed by the person in charge of the entry that:
 - An entry authorization must be obtained from the person in charge by anyone entering the tank.
 - A rescue harness or wristlets must be on the job.
 - The standby observer must know the location of the nearest telephone (with emergency numbers posted); safety eyewash/shower; fire extinguisher; and oxygen inhalator.
 - For all "hot work" inside a tank, the standby observer must be instructed how to shut down welding/burning equipment.



- As long as personnel are inside the vessel, the standby observer must remain in continuous contact with the worker. <u>HE IS NOT TO LEAVE</u> <u>THE JOB SITE EXCEPT TO REPORT AN EMERGENCY</u>.
- <u>UNDER NO CIRCUMSTANCES SHOULD THE STANDBY</u> <u>OBSERVER ENTER THE VESSEL</u>. If the worker(s) in the tank becomes ill or injured, the watcher is to put in effect the emergency plan described in the attached Standard Operating Procedure.
- The standby observer still **DOES NOT ENTER THE TANK** until help is available.
- After being instructed in his responsibilities, the standby observer will sign an instruction form indicating his understanding.
- Welding and burning within a tank:
 - All welding and burning equipment must be provided with a shutoff device under the control of the standby observer; and the standby observer must know how to shut off the equipment if it becomes necessary.
 - Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
 - For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site.
 - > Standard welding and burning safety precautions will always be followed.



II.C.12(a)-8

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PHASE III--REMOVE TANK

- Disconnect and cap all appurtenant piping.
- Disconnect and decontaminate all appurtenant pumping equipment.
- The vessels shall be removed and reused by Safety-Kleen or cut up and sold as scrap.
- The surface soil beneath the fill pipes and beneath each tank will be sampled and analyzed for volatile organic compounds, mineral spirits, lead, and cadmium.
- The secondary containment system will be disassembled. The construction materials will be tested with TCLP (pertinent constituents only). If the construction materials are classified as non-hazardous via TCLP, then they will be disposed of as a solid waste in a sanitary landfill. In the event the construction materials are identified as hazardous via TCLP, then the construction materials will be disposed of as a hazardous waste in accordance with RCRA regulations.
- Contaminated soil, if it exists, shall be removed and properly disposed of. An additional work plan to determine the extent of contamination and remediation procedures will be submitted in this case.

PHASE IV--BACKFILLING AND REGRADING

- Backfill any excavation with previously excavated material with proper compaction.
- Add additional backfill with proper compaction if necessary. The material must be of clean materials and easily compacted in place.
- Regrade the site to proper topography.



II.C.12(a)-9

Remove and dispose of nonusable debris.

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 during which wastes are periodically received. Safety-Kleen shall 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 must be amended within 60 days of the changes.
- Within 90 days of receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, Safety-Kleen shall 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

The following requirements are met:

- ► The facility has the capacity to receive additional wastes;
- ► There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
- Closure of the facility would be incompatible with continued operation of the site; and



- Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen shall complete closure activities in accordance with the approved closure plan and 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.
- When closure is completed, Safety-Kleen shall submit to the certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.



PART II K

CLOSURE



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ATTACHMENT II.K.1

CLOSURE PLAN

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ATTACHMENT II.K.1 CLOSURE PLAN

CLOSURE INTRODUCTION

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. No onsite disposal activity occurs at any plant and, hence, no disposal capacity will be exhausted that will necessitate closure of a facility. Based on current business and facility conditions, this facility is expected to remain in operation until the year of 2000.

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

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

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

Facility Data

Tank Area

15,000-gallon waste mineral spirits tank in a three-foot-high concrete containment area enclosed inside a building and a 20,000-gallon spent antifreeze tank. This building also



houses one 20,000-gallon nonhazardous waste oil tank, a 15,000-gallon clean mineral spirits tank, and a 5,000-gallon clean perchloroethylene tank.

Container Storage Area:

A 48' x 78' foot area with sloped floor and collection sump. The maximum total volume stored is 18,750 gallons with 6,912 gallons anticipated to be waste mineral spirits dumpster mud containers, dry cleaner wastes, antifreeze, spent immersion cleaner, paint wastes, and/or FRS wastes.

Solvent Return/Fill Shelter:

One 45-foot by 44-foot structure with two solvent return receptacles (wet dumpsters) each and ancillary equipment. Each dumpster can hold 275 gallons of waste.

MAXIMUM INVENTORY OF WASTE

Tank Wastes

The maximum amount of waste mineral spirits in the tank is 15,000 gallons, and spent antifreeze in the tank is 20,000 gallons.

<u>Containerized Waste</u>: Anticipated maximum of 6,912 gallons This amount includes any combination of 5-, 15-, 16-, split 30- (also known as 20gallon), 30-, 55-, and 85-gallon containers.

Dumpsters: 550 gallons (two 275-gallon dumpsters)



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CLOSURE PROCEDURE

Container Storage Areas

- The container storage area houses containers of used immersion cleaner, mineral spirits, dumpster mud, antifreeze, paint waste, dry cleaning wastes, and FRS wastes.
- At closure, all containers will be removed and transported to the recycle center with proper packaging, labeling, and manifesting where the contents in the containers will be reclaimed and the containers will be cleaned for reuse.
- The concrete floor and spill containment areas will be cleaned with detergent solution and the rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium, using SW-846 methods, to determine the effectiveness of decontamination. The area will continue to be washed and rinsed until levels are below maximum contaminant levels (MCLs), or if MCLs are not available, practical quantification levels (PQLs) as specified in Appendix IX of 40 CFR 264.
- 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. It should be noted that wash water and rinsate will <u>not</u> be allowed to drain to the waterway. It is anticipated that approximately 350 gallons of rinsate will require RCRA disposal.
- The equipment 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 hose will be washed with a detergent solution to decontaminate it. The containers will be used to store the wastewater.



Solvent Return/Fill Shelter Area

- This area is used to return the used mineral spirits to the storage tank.
- Closure of the solvent return receptacles (wet dumpster) will be made prior to the cleaning and removal of the storage tank.
- At closure, the sludge in the dumpsters ("dumpster mud") will be cleaned out and containerized, labeled, and manifested for proper disposal at permitted facilities.
- The dumpsters and the dock area will be cleaned with detergent solution and the rinsate analyzed for mineral spirits, volatile organic compounds, lead, and cadmium to determine the effectiveness of the decontamination. The area will continue to be washed and rinsed until levels are below detectable MCLs, or PQLs if MCLs are not available.
- The rinsing fluids will be discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described herein.
- The cleansed dumpster and dock structure will be reused by Safety-Kleen, or scrapped.
- The cleanup equipment and solutions disposal are the same as those listed earlier.

PHASE I--OPEN THE TANK

- Access to above ground tanks is obtained by removing manways.
- Prior to opening the tanks, the personnel should have full-face respiratory protection and protective clothing. Once the tanks have been opened they will be provided



with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of the remaining material.

PHASE II--REMOVING WASTE AND CLEANING TANK

- Before removing the waste from the tank, all piping and appurtenant equipment will be flushed first with clean mineral spirits followed by detergent solution.
- The method to remove the waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sludge as possible.
- Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high pressure wash system using clean solvent and detergent solution to rinse residual material from the walls and bottom of the tanks. The evacuated material and the rinse solution will be returned to the recycle center for reclamation. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of unnecessary material. The final rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium, using SW-846, to determine the effectiveness of decontamination. The tank will continue to be washed and rinsed until levels are below MCLs, or PQLs if MCLs are not available. Rinsate will be removed using a vacuum tanker truck and will be disposed of as hazardous waste. It is anticipated that approximately 2,000 gallons of rinsate will require RCRA disposal.
- Storage tanks are considered confined spaces, i.e., spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur.



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- Confined space entry requires special operating procedures:
 - Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.
 - Supply valves must be closed and "tagged" and bleeder valves left open, or supply piping should be disconnected.
 - Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "OFF."
 - On tanks where flammable vapors may be present, all sources of ignition must be removed.
 - All tanks must be tested for flammable vapors, toxic gases or oxygen deficiency, in that order, as applicable. The results of such tests should be displayed on the job site.
 - In all tank entering situations, an Oxygen Deficiency Test shall be performed prior to tank entry.
 - Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test."
 - In most circumstances, flash tests and oxygen deficiency tests will be performed by the supervisor of the area in which the work is being performed.



- Under any conditions where a possibility (no matter how remote) of toxic vapors being present in the tank to be entered exits, the supervisor will arrange to have the air tested.
- A set of wristlets or a rescue harness and sufficient rope must be present at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.
- Workers should wear a rescue harness if entering a tank with a large enough opening to easily effect a rescue. In tanks with small openings, only wristlets may be used. However, in cases where there are agitator shafts, containers, or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the life-line may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- A constant source of fresh air must be provided to ensure a complete change of air every few minutes. In cases of <u>short-term entry</u> for inspection or removal of objects, an air mask is recommended. In cases of <u>long-term entry</u> (generally for repair) the use of an air mover should be considered.
- When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.
- Adequate illumination must be provided.
 - A flashlight or other battery operated light must also be available to provide illumination for a safe exit in the event of an electrical power failure.



- In any tank used to store flammable liquids, explosion-proof lighting must be used.
- ► All electrical equipment to be used inside the tank must be in good repair and grounded.
- Others working in the immediate area shall be informed of the work being done and they shall inform the watcher or supervisor immediately of any unusual occurrence which may make it necessary to evacuate the tank.
- The "buddy" (standby observer) system:
 - Men working inside a confined space must be under the constant observation of a fully-instructed standby observer.
 - Before anyone enters the tank, the standby observer will be instructed by the person in charge of the entry that:
 - An entry authorization must be obtained from the person in charge by anyone entering the tank.
 - A rescue harness or wristlets must be on the job.
 - The standby observer must know the location of the nearest telephone (with emergency numbers posted); safety eyewash/shower; fire extinguisher; and oxygen inhalator.
 - For all "hot work" inside a tank, the standby observer must be instructed how to shut down welding/burning equipment.



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- As long as personnel are inside the vessel, the standby observer must remain in continuous contact with the worker. <u>HE IS NOT TO LEAVE</u> <u>THE JOB SITE EXCEPT TO REPORT AN EMERGENCY</u>.
- <u>UNDER NO CIRCUMSTANCES SHOULD THE STANDBY</u> <u>OBSERVER ENTER THE VESSEL</u>. If the worker(s) in the tank becomes ill or injured, the watcher is to put in effect the emergency plan described in the attached Standard Operating Procedure.
- The standby observer still **DOES NOT ENTER THE TANK** until help is available.
- After being instructed in his responsibilities, the standby observer will sign an instruction form indicating his understanding.
- Welding and burning within a tank:
 - All welding and burning equipment must be provided with a shutoff device under the control of the standby observer, and the standby observer must know how to shut off the equipment if it becomes necessary.
 - Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
 - For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site.
 - ► Standard welding and burning safety precautions will always be followed.



PHASE III--REMOVE TANK

- Disconnect and cap all appurtenant piping.
- Disconnect and decontaminate all appurtenant pumping equipment.
- The vessels shall be removed and reused by Safety-Kleen or cut up and sold as scrap.
- The surface soil beneath the fill pipes and beneath each tank (see Exhibit B) will be sampled and analyzed for volatile organic compounds, mineral spirits, lead, and cadmium.
- Contaminated soil, if it exists, shall be removed and properly disposed of. An additional work plan to determine the extent of contamination and remediation procedures will be submitted in this case.
- The secondary containment system will be disassembled. The construction materials will be tested with TCLP (pertinent constituents only). If the construction materials are classified as non-hazardous via TCLP, then they will be disposed of as a solid waste in a sanitary landfill. In the event the construction materials are identified as hazardous via TCLP, then the construction materials will be disposed of as a hazardous waste in accordance with RCRA regulations.

PHASE IV--BACKFILLING AND REGRADING

- Backfill any excavation with previously excavated material with proper compaction.
- Add additional backfill with proper compaction if necessary. The material must be of clean materials and easily compacted in place.



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- Regrade the site to proper topography.
- Remove and dispose of nonusable debris.

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 during which wastes are periodically received. Safety-Kleen shall 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 must be amended within 60 days of the changes.
- Within 90 days of receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, Safety-Kleen shall 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

The following requirements are met:

- ► The facility has the capacity to receive additional wastes;
- ► There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
- Closure of the facility would be incompatible with continued operation of the site; and

II.K.1-11



- Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen shall complete closure activities in accordance with the approved closure plan and 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.
- When closure is completed, Safety-Kleen shall submit to the certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.



INSTRUCTIONS FOR UPDATING THE SAFETY-KLEEN BOYNTON BEACH, FLORIDA OPERATING PERMIT APPLICATION FLD984167791

Attachments to Replace/Include

Reason for Replacement

(Text pages only unless otherwise indicated)

Cover Page and Table of Contents

Page I.B.3-1B

Attachment I.D.2

Added references to antifreeze tank.

Removed references to drum colors.

Removed references to drum sizes.

Added Fluid Recovery Service (FRS) wastes.

Added antifreeze tank description.

Added Fluid Recovery Service (FRS) wastes.

Added tank as process code for ethylene glycol.

Added references to antifreeze tank.

Added references to antifreeze tank.

Added antifreeze in tanks.

Added Fluid Recovery Service (FRS) wastes.

Removed references to drum sizes.

Changed alternate emergency coordinator.

Changed reference from oil tank to antifreeze tank.



Attachment I.D.3

Page II.A.1(a)-2D

Page II.A.1(c)-1A

Attachments II.A.4(b) (text pages only)

Attachment II.A.4(b), pages iii and II.A.4(b)-3C

Page II.A.4(b)-3A

13112.28B/04/REVINST/KSC/BAI/5/120691

Attachments to Replace/Include	Reason for Replacement
Attachment II.A.4(b), Appendix B	Reissue letters to local authorities.
Page II.A.4(d)-5A	Changed reference from oil tank to antifreeze tank.
Attachment II.A.5, Table II.A.5-1	Added Fluid Recovery Service (FRS) wastes.
	Added antifreeze tank.
Pages II.A.6-2A, II.A.6-2B, II.A.6-2C, and II.A.6-2D	Added Fluid Recovery Service (FRS) wastes.
	Added antifreeze tank references.
Attachment II.B.1	Reference to Fluid Recovery Service (FRS) wastes on page II.B.1-2.
Attachment II.B.3	Removed references to drum color.
	Removed references to drum sizes.
	Added references to Fluid Recovery Service (FRS) wastes.
Attachment II.B.4, Table II.B.4-1	Added references to Fluid Recovery Service (FRS) wastes.
	Provided table of container sizes.
	Removed references to color of drums.
Attachment II.B.6	Changed drum sizes on page II.B.6-2.
	Added references to Fluid Recovery Service (FRS) wastes.
Attachment II.C-1 (Remove no pages)	Add new tank assessment to attachment.
Attachment II.C-2 and page II.C-2-1A	Added spent antifreeze tank assessment. Added reference to the 20,000-gallon spent antifreeze tank.
Attachment II.C-7 and page II.C-7-1A (text pages only)	Added reference to the 20,000-gallon spent antifreeze tank.



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Attachments to Replace/Include

Attachment II.C-9

Attachment II.C-12(a)

Attachment II.K.1

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Reason for Replacement

Added reference to the 20,000-gallon spent antifreeze tank.

Added reference to the 20,000-gallon spent antifreeze tank on page II.C.12(a)-2.

Added reference to the 20,000-gallon spent antifreeze tank on pages II.K.1-1 and II.K.1-2.

Added Fluid Recovery Service (FRS) wastes.

Changed drum sizes.



RCRA OPERATING PERMIT APPLICATION SAFETY-KLEEN CORP. LOT 46B QUANTUM INDUSTRIAL PARK BOYNTON BEACH, FLORIDA

FLD 984167791

April 23, 1991

Revised June 25, 1991

Revised December 6, 1991

Prepared for:

Safety-Kleen Corp. 777 Big Timber Road Elgin, Illinois 60123

Prepared by:

Environmental Resources Management-South, Inc. 9501 Princess Palm Avenue, Suite 100 Tampa, Florida 33619 (813) 622-8727



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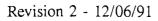
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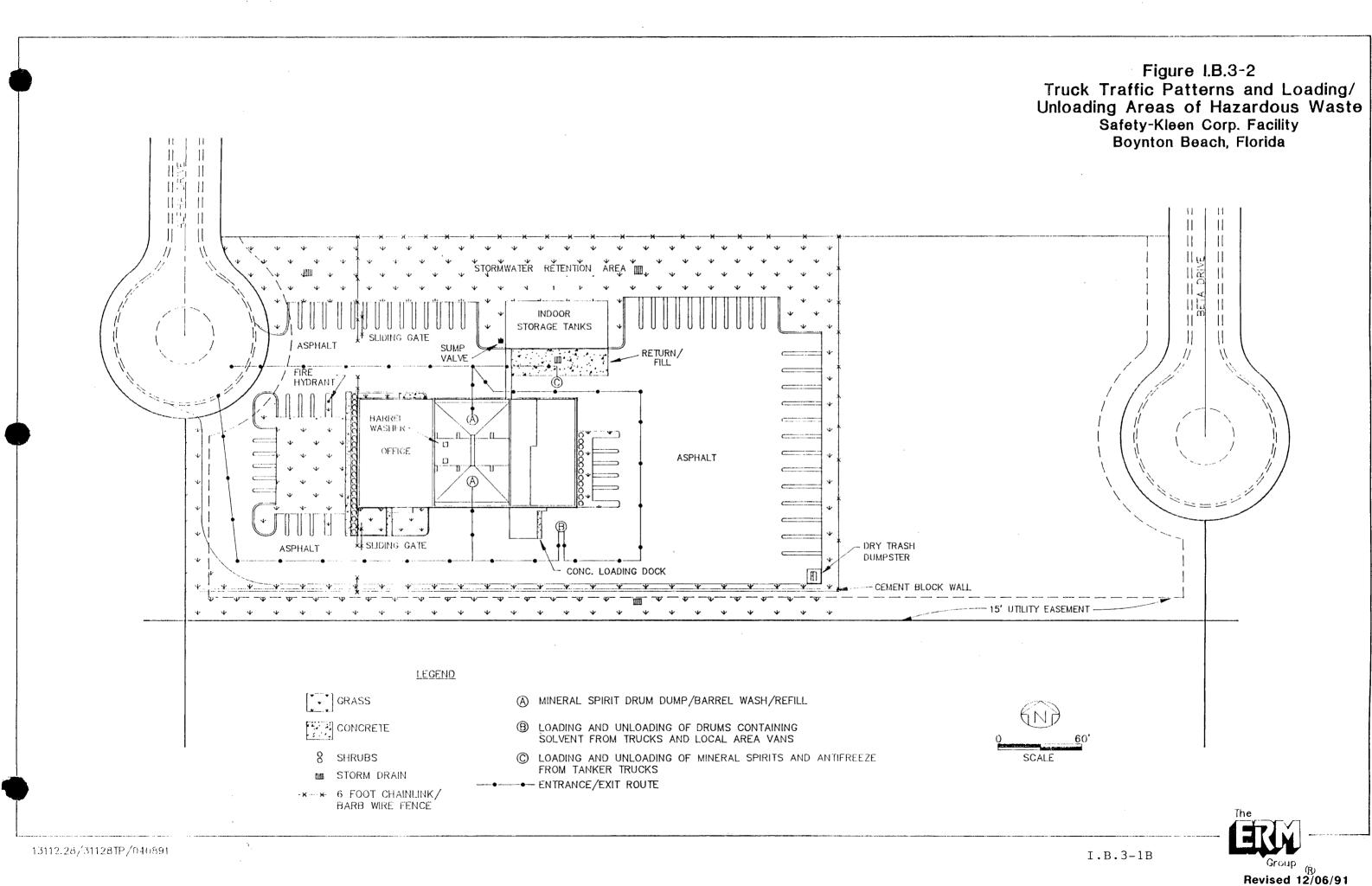


PART I

GENERAL FACILITY INFORMATION

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ATTACHMENT I.D.2

DESCRIPTION OF FACILITY OPERATION

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ATTACHMENT I.D.2 DESCRIPTION OF FACILITY OPERATION

DESCRIPTION OF THE BUSINESS

Safety-Kleen Corp. of Elgin, Illinois 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 hydrocarbon and chlorinated solvents and small parts washing equipment. A unique feature of this business concept is that the solvent is produced through recycling the used solvent that is leased to the customers. Approximately two-thirds of the clean solvent leased has been previously used by the customers.

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 service centers (sales branches) located in 45 states domestically that warehouse the products and equipment required to service the customers in their sales areas. On a regular 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 types of solvents.

Basically, Safety-Kleen handles three types of parts washer solvents: a mineral spirits solvent and old and new formulations of immersion cleaner. The old immersion cleaner solvent is labeled under the trade name of "Immersion Cleaner and Carburetor and Cold Parts Cleaner #609." It is a two-phase system consisting of an upper aqueous (water) layer and lower non-aqueous (solvent) layer. The water phase consists of water and Dresinate TX (sodium soap of tall oil). The solvent phase is composed of methylene chloride, orthodichlorobenzene, cresylic acid, and an amines additive. A new immersion



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cleaner is being marketed under the name #699 and will eventually replace the old immersion cleaner. It is a non-chlorinated solvent mixture. The solvent is composed of heavy aromatic naphtha, N-methyl-2-pyrolidon dipropylene glycol methyl ether, monoethanolamine and oleic acid. It contains a maximum of 1 percent total chlorinated solvents.

The solvents are distributed and collected by their service representatives. Containers are transported in specially-equipped, enclosed route trucks. Clean solvents are distributed from and used solvents returned to the service center where they are stored in separate tanks for the clean and used mineral spirits bulk storage. Warehouse space is dedicated for the storage of both clean and used immersion cleaner containers. Safety-Kleen leases parts washing equipment, including partially filled containers, which double as the solvent reservoir of the parts washer. During servicing, the quantity of used solvent removed from each machine ranges from 5 to 20 gallons. The mineral spirits are collected in containers. The 609 and 699 Immersion Cleaners are also housed in containers.

The mineral spirits are transported in covered containers between the service center and customers. Upon returning to the service center, the used mineral spirits are transferred from the containers into a wet dumpster (solvent return receptacle) in which coarse solids in the mineral spirits are retained. Used mineral spirits in the wet dumpster flow into a 15,000-gallon aboveground tank for storage. Used mineral spirits solvent is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers a load of clean mineral spirits. The sludge in the wet dumpster is periodically cleaned out, containerized, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation.

Periodically, a company truck is dispatched from one of Safety-Kleen's nationwide solvent recycle facilities to the service center to deliver a load of clean solvent and pick



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up a load of used solvent. Mineral spirits are transported in bulk tank trucks between the service centers and the recycle facilities. The Immersion Cleaner remain in the covered containers during transfer between the service centers and the recycle facilities. Approximately 97 percent of the solvent handled in the parts washer business is mineral spirits, while the remainder is immersion cleaner.

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are containerized on the customer's premises and are periodically collected by a sales representative. The containerized waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. Approximately 35 percent of this waste is returned to dry cleaners as usable product.

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Paint gun cleaning machines are leased to customers with a reservoir of lacquer thinner (for cleaning the paint guns). On a periodic basis the reservoir is replaced and the spent solvent taken back to the facility for shipment to a reclamation facility. Wastes containing various thinners and paints are collected in containers on the customer's premises. The sales representative collects these containers and stores them in the container storage area. These wastes are periodically shipped to a reclaimer and the regenerated solvent is distributed to Safety-kleen customers for use as product.

Safety-Kleen offers generators of large quantities of Fluid Recovery Service (FRS) wastes a reclamation service through its FRS wastes collection service. Wastes containing mineral spirits, halogenated solvents, and lacquer thinners are shipped from the generator to the accumulation center in containers. The containers are then shipped to the Safety-Kleen recycle center in Lexington, South Carolina or to an independent reclaimer.



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In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. These wastes are deposited into a 150-gallon translucent carboy by the customer, on the customer's premises, and the carboy is pumped into containers or a 3,500-gallon tanker truck by a sales representative. It is then placed in the container storage warehouse or a bulk tank in the tank building for shipment to a Safety-Kleen recycle center. Approximately 35 percent of this waste is returned to customers as usable product.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the service center to the customer, from the customer to the service center, from the service center to the recycle facility and then from the recycle center back to the service center. The small quantities of residue remaining in the storage tanks at the service centers and after distillation of the used solvent at Safety-Kleen's solvent recycling facilities are disposed of in accordance with applicable laws and regulations.

This closed loop supplies Safety-Kleen with most of its solvent requirements; the resultant stabilized cost benefits are passed on to its customers. Ownership of the solvent remains with Safety-Kleen; the service center managers are accountable for the quantities of clean and used solvents handled by their branch operations. The service center is basically a temporary storage and transfer facility. By FDER definition, however, these centers are considered to be the waste generator.



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ATTACHMENT I.D.3

WASTE TYPE



ATTACHMENT I.D.3-1 SAFETY-KLEEN CORP. FACILITY BOYNTON BEACH, FLORIDA

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Mineral Spirits	S01 S02	993	D001 and Codes Listed in Note Below
Dumpster Sediment	S01	Included Above	D001 and Codes Listed in Note Below
Tank Bottoms	S01	Included Above	D001 and Codes Listed in Note Below
Spent Ethylene Glycol	S01 S02	5,000	Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula)	S01	31	F002, F004, and Codes Listed in Note Below
(New Formula)	S01	Included Above	Codes Listed in Note Below
Dry Cleaning Waste	S01	350	D001 or F002 and Codes Listed in Note Below
Paint Waste	S01	50	D001, F003, F005 and Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01	250	D001, F001, F002, F003, F005, and Codes Listed in Note Below
Off Specification Perchloroethylene	S01	10	U210

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



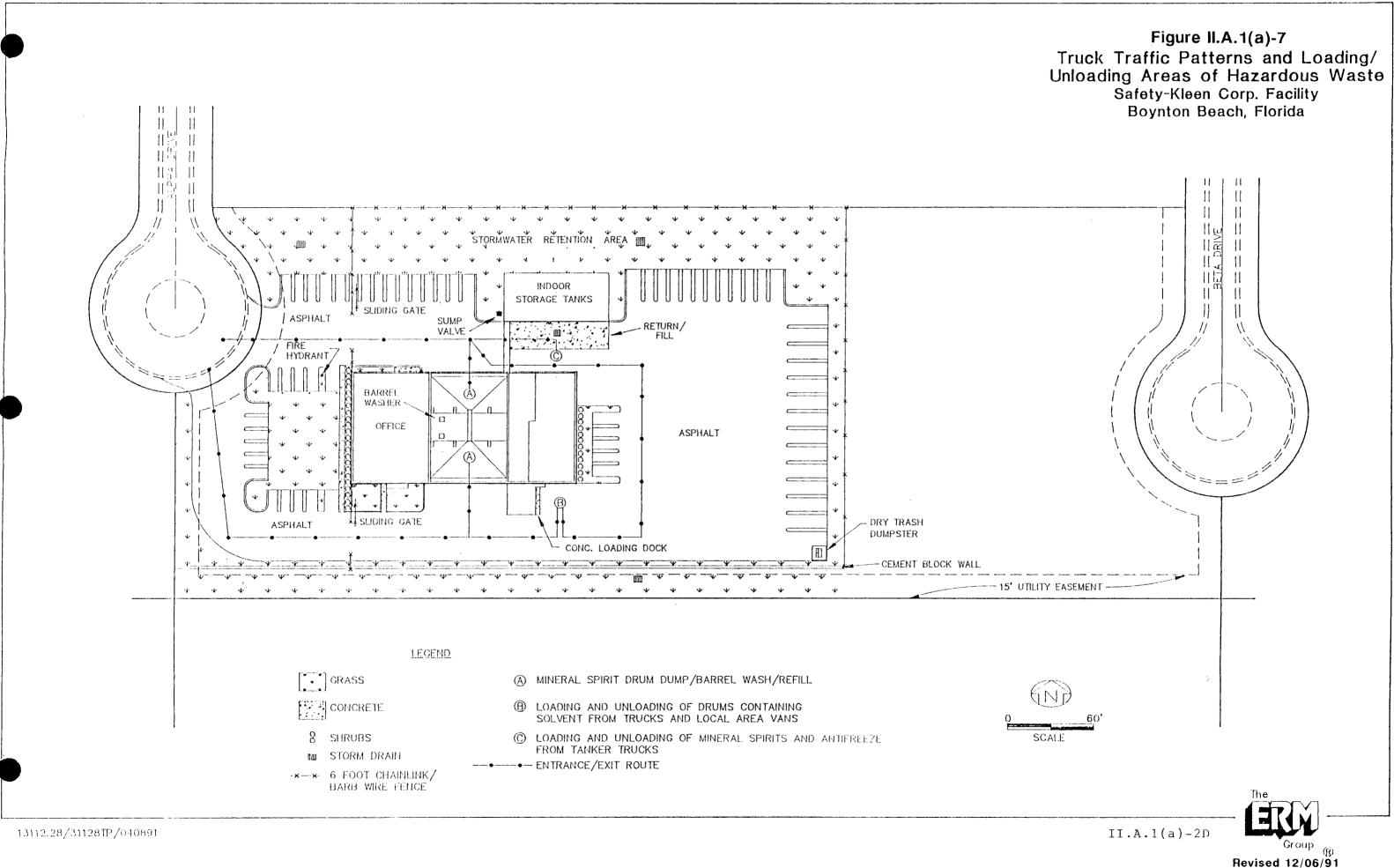
PART II A

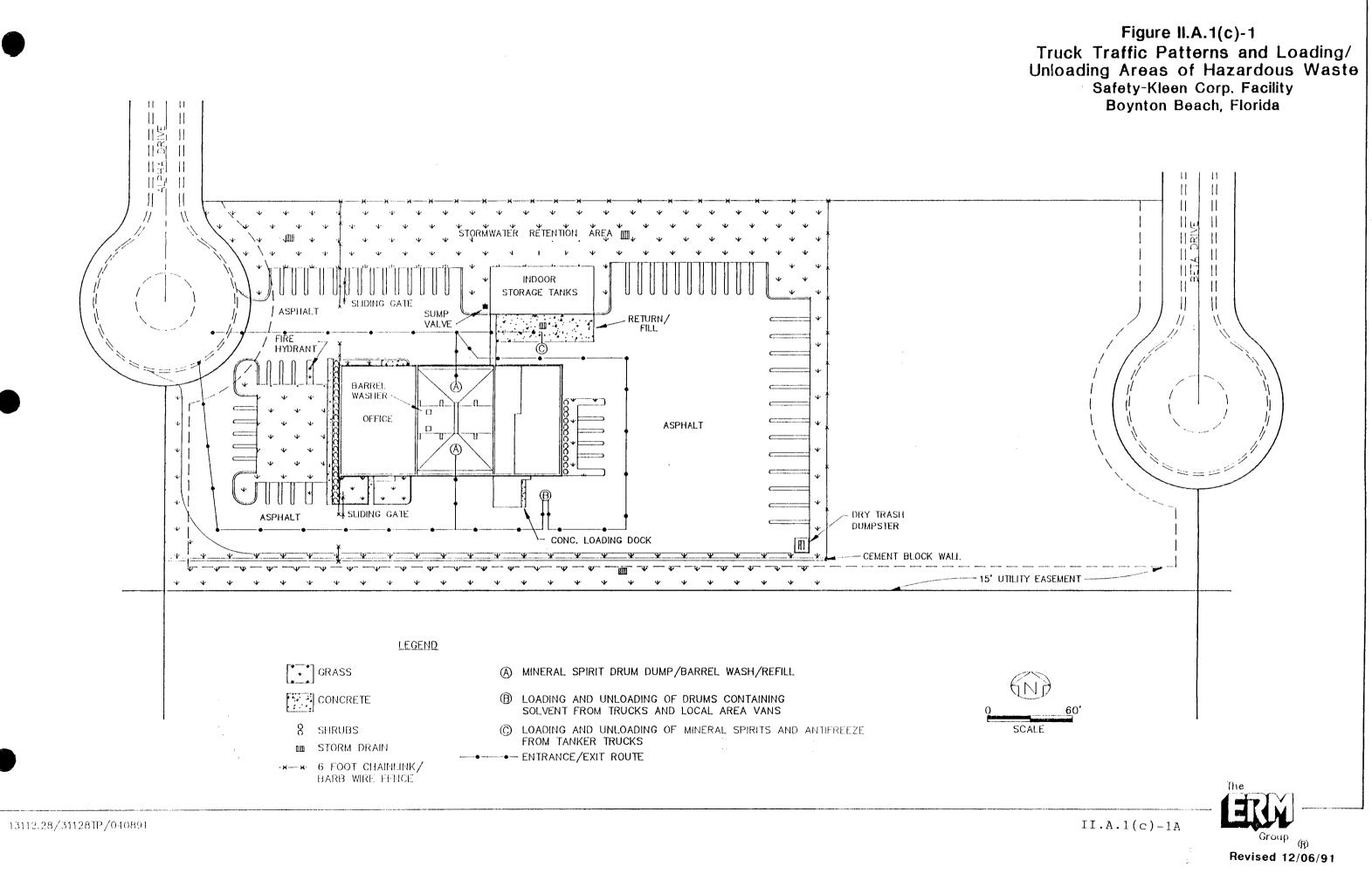
GENERAL



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ATTACHMENT II.A.4(b)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS



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APPENDIX B Letters to Local Authorities

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EMERGENCY PHONE NUMBERS

Emergency Coordinators

Primary:Thomas H. SandsAlternate:Jereme Breen9873 Lawrence Road, G20565 Deer PathBoynton Beach, FL 33436Lake Worth, FL 33424Home:(407) 736-8968Home: No phone availableOffice:(407) 736-1339Office: (407) 736-1339

Emergency Notification Phone Numbers

Safety-Kleen Environmental Department Telephone (708) 888-4660 (24-hour number)

National Response Center Telephone (800) 424-8802

Southeast Florida District of the FDER, 1900 South Congress Avenue, Suite A, West Palm Beach, Florida (407) 433-2650 or (904) 488-1320 - 24 hours.

South Florida Water Management District, West Palm Beach, Florida (407) 686-8800

Emergency Team to be Notified

Boynton Beach Fire Department 150 E. Boynton Beach Blvd. Boynton Beach, FL 33435 (407) 738-7430

Boynton Beach Police Department 135 N.E. 1st Avenue Boynton Beach, FL 33435 (407) 732-8132

Bethesda Memorial Hospital 2815 S. Seacrest Blvd. Boynton Beach, FL 33435 (407) 737-7733 or 278-7733 O.H. Materials Company P.O. Box 551 Findlay, OH 45840 (800) 537-9540 (Primary Cleanup Contractor)

AMO Pollution Services, Inc. P.O. Box 311B Canonsburg, PA 15317 (800) 325-1398 (Secondary Cleanup Contractor)

Ryckman's Emergency Action and Consulting Team P.O. Box 27310 St. Louis, MO 63141 (800) 325-1398 (Secondary Cleanup Contractor)

ATTACHMENT II.A.4(b)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS

GENERAL INFORMATION

Purpose

The contingency plan and emergency procedures are designed to ensure that Safety-Kleen is prepared to address emergency situations rapidly and in a manner to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or nonsudden release of hazardous material constituents to the air, soil, surface water, or ground water at the facility.

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

General Description of Activities

The business activities conducted a the Boynton Beach Service Center relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provisions of a solvent leasing service for the customers. Clean solvents are distributed from and the used solvents are returned to the service center, where separate storage tanks are utilized for the storage of clean and used mineral spirits (solvent) and spent antifreeze, and warehouse space is designated for the storage of containers of both clean and used immersion cleaner, mineral spirits, tank bottoms, dumpster mud, antifreeze, paint, dry cleaning wastes (chlorinated solvent), and FRS wastes. Safety-Kleen uses a container color scheme as a part of its waste management system. An overpack container is used for the management of containers whose integrity has been compromised.



II.A.4(b)-1

The mineral spirits are transported in covered containers between the service center and customers. Upon returning to the service center, the used mineral spirits are transferred from the containers into a wet dumpster (solvent return receptacle) in which coarse solids in the mineral spirits are retained. Used mineral spirits in the wet dumpster flow into a 15,000-gallon aboveground tank for storage. Used mineral spirits solvent is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers a load of clean mineral spirits. The sludge in the wet dumpster is periodically cleaned out, containerized, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation.

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 service center. Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers and are stored temporarily at the service center. The containers are picked up periodically for recycling at the recycle facility.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in containers.

The antifreeze waste is approximately one-third water and two-thirds antifreeze (ethylene glycol) and contaminants. The waste is collected in 150-gallon carboys at the customer's facility. The spent antifreeze is then transferred to containers or a 3,500-gallon tanker truck. The tanker truck empties the waste into a 20,000-gallon storage tank. The containerized waste is placed in the container storage area prior to shipment to a reclamation facility.

The paint wastes consist of various lacquer thinners and paints collected in containers.

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II.A.4(b)-2

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. The MSDSs provided in Appendix A represent the biological, physical, and chemical properties of both the fresh and used products.

Figures II.A.4(b)-1 and II.A.4(b)-2 shows the basic site and floor plans, particularly, the locations of waste management facilities, emergency equipment, facility storage, and evacuation routes.

EMERGENCY NOTIFICATION

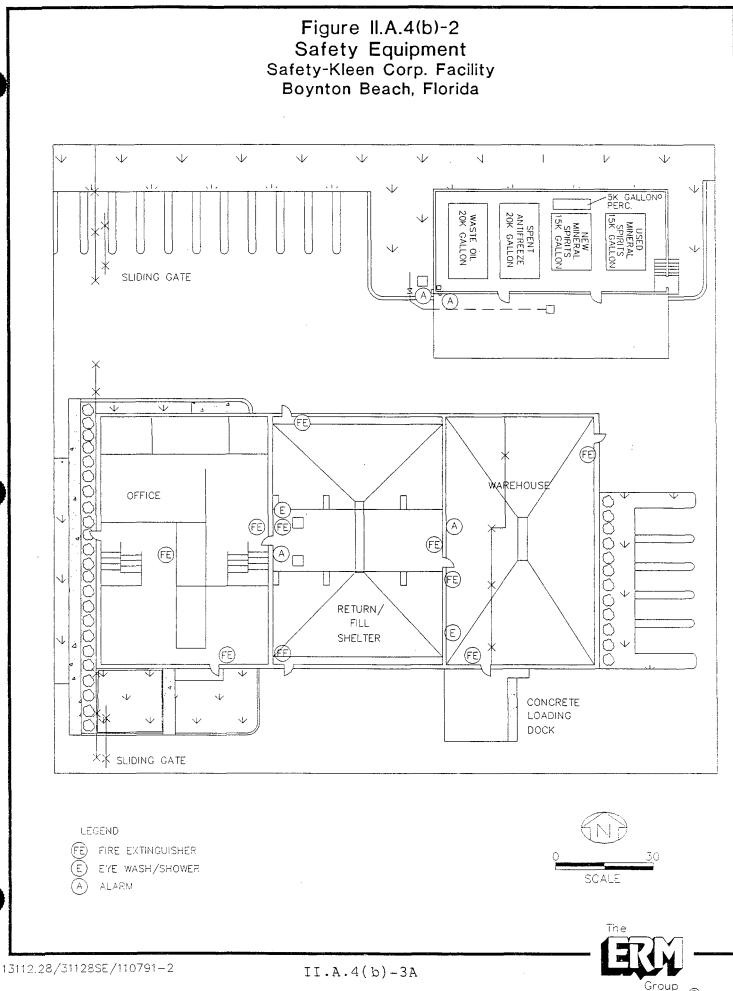
Emergency Coordinator

The Branch Manager or his designee is the emergency coordinator. Table II.A.4(b)-1 includes the names, home addresses, and both office and home phones of the primary emergency coordinator and his alternatives. At least one employee is either present on the facility premises or on call with responsibility for 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 in Table II.A.4(b)-1. A Telephone Notification Log is shown in Table II.A.4(b)-2.





Revised 12/08/91

TABLE II.A.4(b)-1 EMERGENCY NOTIFICATION

Emergency Coordinators

Primary:Thomas H. SandsAlternate:Jereme Breen9873 Lawrence Road, G20565 Deer PathBoynton Beach, FL 33436Lake Worth, FL 33424Home:(407) 736-8968Home: No phone availableOffice:(407) 736-1339Office: (407) 736-1339

Emergency Notification Phone Numbers

Safety-Kleen Environmental Department Telephone (708) 888-4660 (24-hour number)

National Response Center Telephone (800) 424-8802

Southeast Florida District of the FDER, 1900 South Congress Avenue, Suite A, West Palm Beach, Florida (407) 433-2650 or (904) 488-1320 - 24 hours.

South Florida Water Management District, West Palm Beach, Florida (407) 686-8800

Emergency Team to be Notified

Boynton Beach Fire Department 150 E. Boynton Beach Blvd. Boynton Beach, FL 33435 (407) 738-7430

Boynton Beach Police Department 135 N.E. 1st Avenue Boynton Beach, FL 33435 (407) 732-8132

Bethesda Memorial Hospital 2815 S. Seacrest Blvd. Boynton Beach, FL 33435 (407) 737-7733 or 278-7733 O.H. Materials Company P.O. Box 551 Findlay, OH 45840 (800) 537-9540 (Primary Cleanup Contractor)

AMO Pollution Services, Inc. P.O. Box 311B Canonsburg, PA 15317 (800) 325-1398 (Secondary Cleanup Contractor)

Ryckman's Emergency Action and Consulting Team P.O. Box 27310 St. Louis, MO 63141 (800) 325-1398 (Secondary Cleanup Contractor)



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. 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:

- a. 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.
- b. If a fire or explosion is determined uncontrollable by plant personnel or threatening neighboring establishments or population, assistance from a local emergency

II.A.4(b)-4

response agency shall be summoned immediately and an evacuation order be requested.

- c. In case of a release outside of the containment area that is deemed immediately uncontainable or unrecoverable, a local emergency response agency and/or specialty cleanup contractor shall be called in.
- d. After termination of a fire or explosion, 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.
- e. 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.
- f. 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 that could threaten human health, or the environment outside the facility, the coordinator must report those findings, as follows:

a. 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.



II.A.4(b)-5

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b. The coordinator must immediately notify the Southeast Florida District of the FDER, (407) 433-2650, and the National Response Center (800) 424-8802, by telephone.

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 emergency number of the Safety-Kleen Corporation Environmental, Health and Safety Department ((708) 888-4660).

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 buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.



II.A.4(b)-6

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:

- a. No waste that may be incompatible with the released material is treated or stored until cleanup procedures are completed; and
- b. 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 or 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 Florida District of the FDER, 1900 South Congress Avenue, Suite A, West Palm Beach, Florida 33406 (407) 433-2650. The report must include:

- a. Name, address, and telephone number of the owner or operator;
- b. Name, address, and telephone number of the facility;
- c. Date, time, and type of incident (e.g., fire, explosion);
- d. Name and quantity of material(s) involved;



II.A.4(b)-7

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- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. 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 30 gallons of waste) pollution incident.

a. Moving of containers.

Every time a container is moved, a chance exists that it could tip over or be dropped. To minimize the possibility of spillage of solvent under those conditions, all containers must remain covered before being moved.

- b. Delivery truck container transfers.
 - Individual delivery containers contain from five to 55 gallons of waste, a quantity which can be contained by oil sorbent clay or pads, if accidentally spilled.
 - (2) Each vehicle is equipped with a hoist and hand cart for ease of moving clean solvent off the truck and into the customer's shop and returning the dirty solvent to the truck.
 - (3) Clamp type lids are on containers during movement to prevent a spill.

- (4) Each truck should contain a shovel and a quantity of sorbent material to contain a minor spill.
- (5) The cargo should 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 Material Safety Data Sheet (MSDS), the worker would enter the area wearing rubber gloves, boots, and respirator and mop up the liquid and return it to dirty storage. The cleanup is completed only when the workers have cleaned themselves and the emergency equipment with soap and water. Spills originating in the container return/fill area should be contained within its collection trench. This area has three-inch sloped concrete sides leading to the trench. Spills originating in the warehouse area should be retained within its collection trench. The concrete floor in this area is sloped two inches toward the trench. The concrete floor in both these areas is coated with sealant compatible with and resistant to the chemicals stored at this facility.

Spills on Concrete Pads

Concrete pads in loading and unloading areas are, in most cases, equipped with emergency containment. Under most spill conditions, product can be totally contained on the concrete surface and in the catchment system. Upon containment, arrangements must be immediately undertaken to recover the material. Any soil that may be involved must be removed and treated as a hazardous waste.

Tank Spills or Leakage

Aboveground tanks are completely enclosed within a building which has a monolithically poured slab and 36-inch high sides to contain any spilled or leaked solvent. The surface of the monolithic pour (bottom and sides) are coated with a concrete sealant compatible

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with and resistant to the chemicals stored in this area. The remainder of the building is concrete blocks from three feet to the roof. The containment system has been sized in accordance with the regulations, and the product 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 treated as hazardous waste.

Spill Control Procedures

If a harmful discharge occurs:

- a. Stop the discharge, if possible, by immediately transferring the liquid to a good container.
- b. Retain, contain, or slow the flow of the material, if possible, by diking with sorbent pad or dirt. Appropriate personal protective equipment should be worn. Pump and mop up the liquid from the floor into a good container and return the container to storage and then later to the 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 should be collected for proper disposal at a Safety-Kleen recycle center.
- c. If the material escapes the containment efforts, <u>immediately</u> call the cleanup contractor with response time less than two hours (Table II.A.4(b)-1). Record the date, time, and name of person taking the message. Call the primary emergency coordinator, if he is absent.
- d. Immediately recover spilled solvent to reduce property and environmental damage using the safety equipment stored onsite for such situations (Figure II.A.4(b)-2) or

II.A.4(b)-10



call in emergency response contractors (Table II.A.4(b)-1). <u>Start recovery</u> 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 recycle center. In addition, the recovered solvent will be sent to a Safety-Kleen recycle center for reclamation.

- e. Report any incident as soon as possible to Safety-Kleen Corporate Environmental Department on the 24-hour telephone line: (708) 888-4660. If the Environmental Department does not respond within 30 minutes, call the National Response Center (telephone: (800) 424-8802) and Southeast Florida District of the FDER, 1900 South Congress Avenue, Suite A, West Palm Beach, Florida (407) 433-2650.
- f. The person reporting a spill should be prepared to give his 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.



II.A.4(b)-11

Every spill must be recorded on the attached form with the revision of the contingency plan to prevent similar spills in the future. A copy of this report is sent to the Corporate Environment Health and Safety Department.

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

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

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.

Concrete surfaces/containment areas:

- 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. It is believed that a 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 dealt with 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/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

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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 telephones, fire extinguisher, the first-aid kit, and the emergency eyewash/shower. Other emergency response equipment (Table II.A.4(b)-3) 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.

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

FIRE CONTROL PROCEDURES

Call the Fire Department.

 a. Immersion cleaner #609 (old formula) (which is a mixture of chlorinated solvents and water) and dry cleaning wastes are initially not flammable, but produce toxic gases and hydrochloric acid at elevated temperatures (about 1200° F).



II.A.4(b)-14

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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 and local hospital (Table II.A.4(b)-1) when injury occurs and/or order of on-lookers and traffic is to be maintained.

Areas in the service building (offices, container fill/return, container storage) and storage tank building have automatic fire fighting sprinkler systems (Figure II.A.(b)-3). In addition, building walls have a four hour rating.

AVAILABILITY AND REVISION OF THE 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:

- a. The facility license is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
- b. The list or location of emergency equipment changes;



- c. The facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
 - (1) Materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or
 - (2) Changes in response necessary in an emergency.
- d. The names, addresses, or phone numbers of emergency coordinators change;
- e. The employee assigned to each emergency task changes, or
- f. 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 (Material 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.

Potential primary and secondary spill control contractors as well as sorbent suppliers are identified in the Contingency Plan and Emergency Procedures.

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.



Appendix B includes copies of letters which have been transmitted to local authorities for emergency response in the event of an incident where pubic health or environment is threatened.

EVACUATION PLAN

In an uncontrolled emergency, all persons are to be evacuated from the area by means of a verbal cry and assemble across from the entrance drive to the facility (Figure II.A.4(b)-1). Assure that all personnel are accounted for and out of the area. 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.

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.



APPENDIX B

LETTERS TO LOCAL AUTHORITIES





December 7, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Boynton Beach Police Department 135 NE 1st Avenue Boynton Beach, FL 33435

RE: Safety-Kleen Corp. (3-097-01), Lot 46B, Quantum Industrial Park, Boynton Beach, Florida

Dear Sir:

Under terms of U.S.E.P.A. Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize police and fire departments with the layout of the facility, places where facility personnel would be working, entrances to roads inside the facility, and possible evacuation routes.

A copy of the Contingency Plan and Emergency Procedures is enclosed for your file. A facility layout is attached to show where facility personnel would normally be working, entrances to road inside facilities and possible evacuation routes.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter and indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance.

If you have any questions or desire to visit the facility, please contact the branch manager, Mr. Thomas H. Sands (407) 736-1339.

Sincerely,

Victor L. San Agustin, P.E. Regional Environmental Engineer Tampa Region

pjh/mmm

Enclosure(s)

13112.28B/TSK10/EXHIBITS.IE



December 7, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Boynton Beach Fire Department 150 East Boynton Beach Boulevard Boynton Beach, FL 33435

RE: Safety-Kleen Corp. (3-097-01), Lot 46B, Quantum Industrial Park, Boynton Beach, Florida

Dear Sir:

Under terms of U.S.E.P.A. Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize police and fire departments with the layout of the facility, places where facility personnel would be working, entrances to roads inside the facility, and possible evacuation routes.

A copy of the Contingency Plan and Emergency Procedures is enclosed for your file. A facility layout is attached to show where facility personnel would normally be working, entrances to road inside facilities and possible evacuation routes.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter and indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance.

If you have any questions or desire to visit the facility, please contact the branch manager, Mr. Thomas H. Sands (407) 736-1339.

Sincerely,

Victor L. Son Quitin

Victor L. San Agustin, P.E. Regional Environmental Engineer Tampa Region

pjh/mmm

Enclosure(s)

13112.28B/TSK10/EXHIBITS.IE



December 7, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Bethesda Hospital 2815 South Seacrest Boulevard Boynton Beach, FL 33435

RE: Safety-Kleen Corp. (3-097-01), Lot 46 B, Quantum Industrial Park, Boynton Beach, Florida

Dear Sir:

Under terms of U.S.E.P.A. Regulation 40 CFR 264.37, Safety-Kleen Corp. is required to familiarize local hospitals with the properties of the materials handled at their facilities and the types of injuries or illnesses which could result from fires, explosions, or releases at this facility.

A copy of the Contingency Plan and Emergency Procedures is enclosed for your file. A facility layout is attached to show where facility personnel would normally be working, entrances to road inside facilities and possible evacuation routes.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter and indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance.

If you have any questions or desire to visit the facility, please contact the branch manager, Mr. Thomas H. Sands (407) 736-1339.

Sincerely,

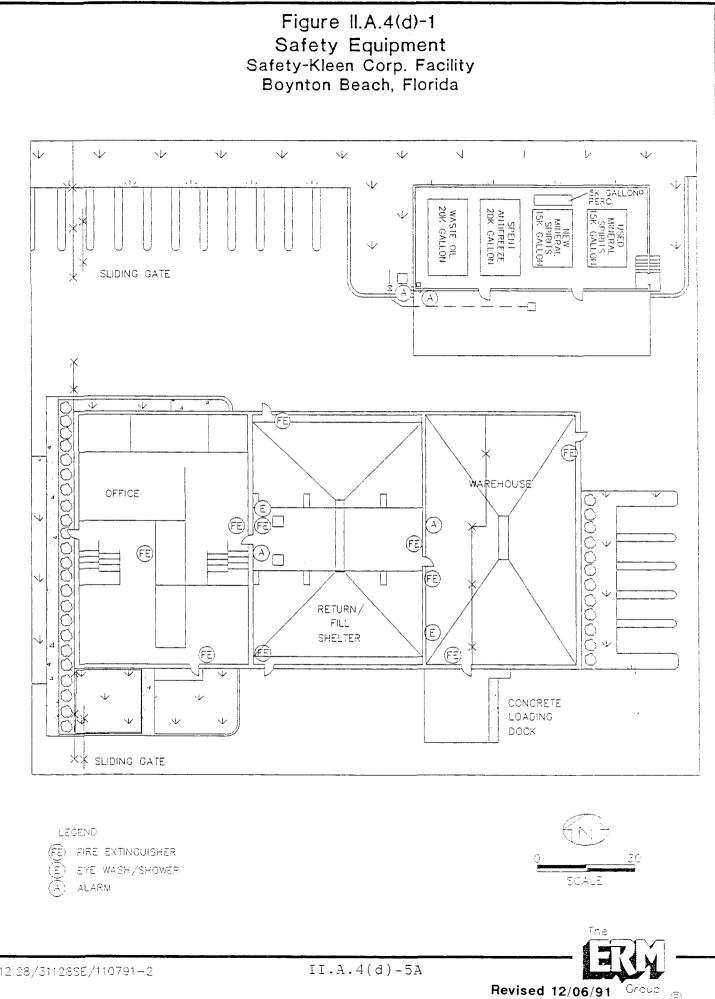
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Victor L. San Agustin, P.E. Regional Environmental Engineer Tampa Region

pjh/mmm

Enclosure(s)

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ATTACHMENT II.A.5

WASTE ANALYSIS REPORT



ATTACHMENT II.A.5 WASTE ANALYSIS REPORT

In accordance with U.S. EPA Hazardous Waste Regulations, seven types of hazardous waste have been identified at the service center:

 The used mineral spirits solvent, returned from customers in separate containers transferred and stored in the aboveground tank awaiting shipment to the recycle facility is considered to be an Ignitable Waste (D001) and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);

Mineral spirits, dumpster mud, and tank bottom sludge accumulated in the solvent return receptacles (wet dumpsters) and in the sludge tank, is considered to be an Ignitable Waste (D001) a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);

2. The used chlorinated solvent #609 (old formula), returned from customers in separate containers and remaining in the same container for shipment to the recycle facility is considered to be a Listed Waste from Non-Specific sources (F002 and F004); and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);



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The used immersion cleaner #699 (new formula), returned from customers in separate containers and remaining in the same container for shipment to the recycle facility, is considered a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);

- 3. Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. While approximately 80 percent of Safety-Kleen's customers use perchloroethylene (F002) and a characteristic waste by TCLP leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043), approximately 17 percent use mineral spirits (D001) and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043), and the remaining three percent use trichloro-trifluoroethane (F002) and a characteristic waste by TCLP leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043);
- 4. Antifreeze waste is approximately one-third water with the remaining third being antifreeze (ethylene glycol) and contaminants. As a protective measure, the container storage area for spent antifreeze is being permitted to store wastes with the following TCLP waste codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029,



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D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043; and

- The paint waste, collected in containers at the customer's place of business and stored in the container storage area, is considered to be an ignitable waste (D001); a listed waste (F003 and F005); and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).
- 6. Eight solvents are collected from FRS waste users: mineral spirits (D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); 1.1.1-trichloroethane (F001, F002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); perchloroethylene and trichloroethylene (F001, F002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026. D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); methylene chloride (F001, F002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); 1,1,2-trichloro-1,2,2-trifluoroethane (F001, F002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043), lacquer thinners (F003, F005, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032,



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D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043); and waste oil which exhibits a characteristic (D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). These wastes, except characteristic waste oil, are shipped in containers and are stored on pallets. It is anticipated that 39,000 gallons of spent mineral spirits, 158,000 gallons of spent halogenated solvents and 60,000 gallons of spent lacquer thinners will be shipped from the service center to a reclaimer on an annual basis.

7. Off specification perchloroethylene (U210) resulting from the management of bulk perchloroethylene. This may have some minor impurities. This is shipped from the service center to a reclaimer.

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

USED MINERAL SPIRITS

The clean mineral spirits solvent is labeled under the trade name of "Safety-Kleen 105 Solvent", so-named because of the flash point of the solvent being 105°F (minimum). Chemically, the solvent primarily consists of petroleum hydrocarbon fraction (the mineral spirits) with boiling points between 310°F and 400°F. Impurities, such as light aromatic hydrocarbons (LAHC) and chlorinated hydrocarbons, usually constitute less than one percent of the total volume. The mineral spirits constitutes over 99.5 percent of the total volume of the solvent.



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The used mineral spirits solvent consists primarily of mineral spirits solvent plus water, solid, oil, and grease picked up in the various degreasing operations. In most instances, no water is associated with the used solvent; however, at times, the water content may range from one percent to as much as 50 percent. The oily bottoms may range from 2 percent to 10 percent, by volume, in the used solvent.

Chemically, the composition of the solvent fraction in the used mineral spirits solvent is essentially the same as the clean solvent, as shown in analyses.

An estimated 275,000 gallons of used mineral spirits are expected to be shipped to a recycle center from this facility.

USED MINERAL SPIRITS BOTTOM SLUDGE

This is material settled from used mineral spirits in the aboveground tanks. It contains basically soils, oil and grease, and some water picked up in the degreasing operations, together with a small amount of mineral spirits. Analyses have shown that the sludge is an ignitable waste and might also be considered toxic using TCLP standards.

The sludge is removed from the aboveground tank periodically and shipped to a Safety-Kleen facility for reclamation.

USED MINERAL SPIRITS DUMPSTER MUD

This waste material is accumulated in the wet dumpsters when emptying the used mineral spirits from the containers into the aboveground storage tanks. The nature of this waste is similar to the used mineral spirits bottom sludge, except with some small metal parts and less mineral spirits. It is regarded as an ignitable waste and often is also considered a characteristic waste using TCLP standards.



II.A.5-5

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The sludge in the dumpsters is cleaned out frequently. The waste is containerized and shipped to Safety-Kleen's facility for recycling. Approximately 150 containers (1,500 gallons) of dumpster mud will be removed from this center annually.

USED IMMERSION CLEANER

The old formula clean chlorinated solvent is labeled under the trade name of "Immersion Cleaner and Carburetor and Cold Parts Cleaner #609." It is a two-phase system consisting of an upper aqueous (water) layer and lower non-aqueous (solvent) layer. The water phase consists of water and Dresinate TX (a sodium soap of tall oil). The solvent phase is composed of methylene chloride, orthodichlorobenzene, cresylic acid, and an amines additive.

A new "Immersion Cleaner and Carburetor and Cold Parts Cleaner #699" is also being leased. It is a heavy aromatic naphtha, N-methyl-2-pyrolidon dipropylene glycol methyl ether, monoethanolamine and oleic acid, and contains a maximum of 1 percent total chlorinated solvents.

The used immersion cleaner is basically unchanged from its clean state, except oil, grease, and other solids may be picked up during the various degreasing operations. The spent solvent is non-flammable. It is regarded as toxic because of the contents of various solvents. Less than five gallons of waste is returned in each container. It is anticipated that 7,500 gallons of used immersion cleaner will be stored at this facility annually.

DRY CLEANING WASTES

Solvent used in dry cleaning of clothing is commonly tetrachloroethylene (or perchloroethylene). Hence, waste generated from dry cleaning operations contains various concentrations of the solvent. Basically, wastes generated by dry cleaning facilities are in the following forms.



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- 1. Cartridge Filter: In addition to the construction materials consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease, and undissolved elements such as lint and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight.
- 2. Muck: At some dry cleaning facilities, a mixture of powdered materials is used as the filter medium for the dry cleaning solvent, in lieu of the cartridge filter. This filter medium normally consists of diatomaceous earth and carbon. In addition to lint, soil, oil, and grease retained by this medium, between 40 and 50 percent by weight of the "muck" is absorbed solvent.
- 3. Still Residue: After filtration, the dry cleaning solvent is distilled by the dry cleaning machine to remove the dissolved materials from the used solvent. The dissolved materials (still residues) are in liquid form and consist of primarily detergent, oil and grease, vinyl acetate (a sizing compound), and 20 to 30 percent of solvent. This facility will ship about 80,000 gallons of dry cleaner wastes for reclamation annually.
- 4. Off specification perchloroethylene is generated by Safety-Kleen during the management of bulk perchloroethylene.

FRS WASTES

Eight solvents are collected from FRS waste users: mineral spirits; 1,1,1trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro-1,2,2trifluoroethane; lacquer thinners; and waste oil exhibiting a characteristic. Prior to accepting an FRS waste customer's waste for recycling, a sample is drawn and analyzed at Safety-Kleen's laboratory in Elgin, Illinois. The criteria used to determine whether a waste is acceptable for recycling are in Table II.A.5-1. The containers are not opened until they reach the recycle center. Samples of the waste collected at the recycle center



II.A.5-7

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TABLE II.A.5-1

ACCEPTANCE CRITERIA FOR FLUID RECOVERY SERVICE WASTES

- 1. Solvents suitable for recycling will include mineral spirits, methylene chloride, 1,1,1-trichloroethane, trichloroethylene, and perchloroethylene, or mixtures of these solvents. Freon TF (1,1,2-trichloroethane-1,2,2-trifluoroethene) and TMC (a mixture of Freon and methylene chloride) will be acceptable for recycling but must be authorized.
- 2. A minimum of 50% yield of usable solvent is necessary. Yield is to be calculated as a percentage of the total sample received. Chemical breakdown of distillate should also be reported since this affects whether the distillate can be suitably incorporated into the Safety-Kleen product line.
- 3. The <u>distillate</u> cannot contain more than 5% by volume of aromatic solvents (toluene + xylene).
- 4. The <u>distillate</u> cannot contain more than 1% oxygenated solvents. (This excludes the inhibitor packages which should be reported as inhibitors).
- 5. Freon contamination is limited to 1% by volume for chlorinated feedstocks. Materials containing methylene chloride and Freon should be noted as producing TMC.
- 6. The <u>raw material</u> cannot contain more than 50% water (free + emulsified). Solids content should not exceed 5% (by centrifuge) by volume.
- 7. Materials with more than 5% solid bottoms are not acceptable feedstocks for normal feed.
- 8. Materials which pose potential safety hazards are not acceptable, i.e. low flash point (less than 100°F), high toxicity, and those that pose explosive hazards during processing.
- 9. Materials which contain herbicides, pesticides, PCBs, and PBBs are not suitable feedstocks due to the potential for contamination of the processing equipment and facility.
- 10. Materials which contain more than 1% unknown are to be referred to Jim Breece or Clark Rose for a decision on further analysis or rejection, depending upon quantity.



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TABLE II.A.5-1 (Continued)

ACCEPTANCE CRITERIA FOR FLUID RECOVERY SERVICE WASTES

- 11. All sample analyses which are approved by the lab will be forwarded to Jim Breece or Clark Rose for their acceptance prior to authorizing the generator to ship material to a recycle center.
- 12. All sample analyses that are rejected by the lab will be forwarded to Industrial Solvents and Operations to resolve whether or not the material can be accepted under a special processing and pricing arrangement.



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wastes are either returned to the customer or properly disposed of. These wastes are shipped in containers and are stored on pallets. It is anticipated that 38,600 gallons of spent mineral spirits, 157,600 gallons of spent halogenated solvents and 60,400 gallons of spent lacquer thinners will be shipped from the accumulation center to a reclaimer on an annual basis.

ANTIFREEZE COLLECTION SERVICE

The spent antifreeze (ethylene glycol) is collected from automobile service stations. These wastes are deposited into 150-gallon translucent carboy by the customer, on the customer's premises, the carboy is pumped into containers or a 3,500-gallon tanker by the sales representative. It should be noted that the vast majority of the antifreeze sample analyses indicated this waste is not hazardous. However, due to the low concentrations at which contaminants render a waste hazardous under TCLP, the container storage area for spent antifreeze will, as a protective measure, be permitted to hold TCLP wastes.

PAINT WASTE COLLECTION

The paint wastes are collected from facilities where one process is managed and the possibility of cross-contamination from other chemicals or wastes is minimal. The contents of the containers are verified by the sales representative when he services the customer and, comparable to the handling of immersion cleaner, the containers are not reopened until they reach the recycle center.

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and paints. Both are characteristic wastes by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in a designated storage area. It is anticipated that this facility will ship 14,300 gallons of paint waste to a reclaimer annually.



II.A.5-8

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ATTACHMENT II.A.6

WASTE ANALYSIS PLAN



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

Hazardous Waste	Parameter ^a	Rationale
1. Used Immersion Cleaner (609IC)	Methylene Chloride Orthodichlorobenzene Cresylic Acid	Formula contains these ingredients: F002 & Cresylic Acid F004
2. Used Immersion Cleaner (699IC)	TCLP	May contain these compounds
3. Used Mineral Spirits	Flash Point TCLP	Ignitable characteristics D001; may contain these compounds
4. Mineral Spirits Tank Bottom Sludge and Free Water	TCLP Flash Point	The sludge and free water may contain these compounds and the sludge has a flash point of 105° F (D001)
5. Mineral Spirits Dumpster Mud	TCLP Flash Point	The sludge and free water may contain these compounds and the sludge has a flash point of 105° F (D001)
6. Dry Cleaning Wastes	Perchloroethylene Trichlorotrifluoroethane Mineral Spirits	Contain ingredient of F002 or contains a hazardous constituent. Ignitable characteristics D001
7. Spent Antifreeze	TCLP	May contain these compounds
8. Paint Waste	Toluene, xylene, methyl ethyl ketone, methyl isobutyl ketone,, acetone, isopropanol, methanol, ethanol, normal butyl acetate, isobutyl acetate, cadmium, chromium, lead TCLP	Contains these components: F003 and F005. Ignitable characteristics D001
9. Fluid Recovery Service Wastes	Volatile Organic Compounds TCLP	Contains D001, F001, F002, F003, and F005 listed components; may contain these compounds.
10. Off Specification Perchloroethylene	None	Pure compound with minor impurities

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



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TABLE II.A.6-2

PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference
pH	pH Meter	ASTM Standard D1293-65
Flash Point	Tag closed cup tester	ASTM Standard D56-79
TCLP	Toxicity Characteristic Leaching Procedure	40 CFR 261, Appendix II
Hydrocarbons and Volatile Organics	Gas Chromatography (GC)	Modified Methods Based on "Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods," SW-846, USEPA and ASTM Standards
Boiling Range	Distillation of Petroleum	ASTM Method D86-78
API Gravity	Hydrometer Method	ASTM Standard D287-67



TABLE II.A.6-3

Hazardous Waste	Reference for Sampling Sampler		Description of Sampling Method	
1. Used Immersion Cleaner	Sampling a drum "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Test Methods for the Evaluation of Solid Waste Physical/ Chemical Methods, SW-846, USEPA	Representative composite sample using drum sampler	
2. Used Mineral Spirits	Sampling a tank "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Same as 1	For tanksBomb sampler (similar to weighted bottle sampler)	
3. Mineral Spirits, Tank Bottom Sludge, and Free Water	Same as 2	Same as 1	Same as 2	
4. Mineral Spirits Dumpster Mud	Same as 1	Same as 1	Same as 1	
5. Dry Cleaning Wastes	Same as 1	Same as 1	Same as 1	
6. Spent Antifreeze	Same as 1 or 2	Same as 1	Same as 1 or 2	
7. Paint Waste	Same as 1	Same as 1	Same as 1	
8. Fluid Recovery Service Wastes	Same as 1	Same as 1	Same as 1	
9. Off Specification Perchloroethylene	Same as 1	Same as 1	Same as 1	

METHODS USED TO SAMPLE HAZARDOUS WASTES



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TABLE II.A.6-4

FREQUENCY OF ANALYSIS

Hazardous Waste	Frequency ^a
1. Used Immersion Cleaner 609	Gas chromatograph annually TCLP every five years
2. Used Immersion Cleaner 699	Gas chromatograph annually TCLP every five years
3. Used Mineral Spirits	Gas chromatograph annually Flash point annually
4. Mineral Spirits, Tank Bottom Sludge, and Free Water	Gas chromatograph annually TCLP every five years
5. Mineral Spirits Dumpster Mud	Gas chromatograph annually TCLP every five years
6. Dry Cleaning Wastes	Gas chromatograph annually TCLP every five years
7. Spent Antifreeze	Gas chromatograph annually TCLP every five years
8. Paint Waste	Gas chromatograph annually TCLP every five years
9. Fluid Recovery Service Wastes	Gas chromatograph annually TCLP every five years
10. Off Specification Perchloroethylene	None

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



PART II B

CONTAINERS

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ATTACHMENT II.B.1

CONTAINMENT SYSTEM

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ATTACHMENT II.B.1 CONTAINMENT SYSTEM

CONTAINMENT

The indoor container storage area shown in Figure II.B.1-1, occupies a portion of the building area which has a sloped concrete floor and a collection trench to form a spill containment system. The capacity of the containment system is designed to be greater than ten percent of the total liquid storage capacity.

The containment area is free of cracks and has been coated with a concrete sealant, Sikagard[®] 62 and was recoated with Semstone[®] 245. As stated by the manufacturer, Semstone[®] 245 is compatible with and resistant to products handled by Safety-Kleen. The manufacturer's statement and information regarding these products are provided in Sub-Attachment II.B.1-1 and Sub-Attachment II.B.1-3.

The containment volume is composed of the sloped concrete floor and the collection trench. As illustrated in Sub-Attachment II.B.1-2, the total containment volume is 2,972 gallons. Therefore, the maximum storage capacity is 29,720 gallons. The types and number of each container may vary; however, the total volume of product and waste stored will never exceed the maximum volume of 29,720 gallons. The estimated maximum storage volume of waste is 6,912 gallons.

Spills are removed by a hand-held, portable electric pump (the COMS pump), wet/dry vacuum cleaner, or sorbent material. Product collected in the collection trench is pumped into a safe container for transport to the recycle facility for reclamation. Only in the event that the spill were to exceed the containment capacity would spilled wastes be able to extend beyond the containment area. Only six openings (doorways) exist in the container containment area. Four of these lead to other containment areas; the container fill/return and the enclosed concrete dock (Figure II.B.1-1). The other two doorways are located on the east side of the container containment area behind a locked



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II.B.1-1

chain link fence. All openings are normally closed and locked. Due to the volume of containment available and the configuration of the container containment area, it is highly unlikely that any spill would extend beyond this area. The complete containment assessment is provided in Sub-Attachment II.B.1-2.

Since the characteristics of the stored wastes are known, analyses are not performed on the materials collected from the containment area. All collected materials are sent to a recycle facility for recycling/reclamation. Recovered materials that cannot be effectively reclaimed at the recycle facility will be, in turn, sent to a permitted facility for disposal.

CONTAINER MOVEMENT

In the container storage area, containers are handled with a hand-truck that is free of sharp points and stacked by hand. Every time a container is moved, a chance exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, containers 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 container. 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 container loading/unloading. With the exception of mineral spirits, all containerized wastes are loaded/unloaded in the vicinity of the garage door on the southern side of the building. The mineral spirits are loaded/unloaded at the fill/return shelter, which are described in the Tank Section, Part IIC.

All containers are transported, moved, and stored carefully in an upright position. The route trucks are equipped with an electric hoist to assist loading/unloading. In the warehouse area, the immersion cleaner, mineral spirits dumpster mud containers, dry cleaning waste, paint waste, and FRS waste containers are moved with two-wheel hand trucks and stacked by hand. All containers will be elevated on pallets to eliminate the possibility of them standing in spilled solvent.

II.B.1-2

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Containers will be double-stacked. The containers will be arranged so that a two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling. Since all materials handled by Safety-Kleen are compatible with one another, no specific areas have been designated for specific wastes. Wastes will be grouped by type and are distinguishable by the color of the container; however, since the actual volume present of any product at a given time varies greatly, it is not practical to assign specific locations to given wastes.



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SEMISTONE[®] 245

High Performance Coating

FAGE, 992

TECHNICAL BULLETIN

DESCRIPTION AND USES:

SEMSTONE 245 is a high performance specialty coating for concrete. Its unique formulation makes it suitable for constant immersion service in chieringted poivents, such as:

SK ATLANTA REGIONAL

- Methylene chloride
- Ethylene dichioride
- Trichlordethylene

In addition, SEMSTONE 245 offers excellent resistance to a very broad range of other hazardous and corrosive chemicals including benzane, phenol, ketones, alcohols and chromic acid, as well as such commonly encountered items as 98% sulfuric acid and 50% caustic. This makes it the preferred choice for protecting hazardous waste handling facilities and other ereas that will regularly see exposure to a wide variety of difficult chemicals.

Other features include:

- . Very rapid cure, providing quick turnaround of projects."
- Can be applied at temperatures as low as 35°F.
- Can be applied over damp concrete.

PACKAGING/COVERAGE:

SEMSTONE 245 is available in 1 gallon, 3 gallon and 26 gallon Units. Each Unit consists of prameasured Part A and Part 5 components. A bagged Part C thizotropic agent is added for work on vertical surfaces.

Application thickness may vary from 25 mils to 125 mils, depending on expected service conditions (i.e., chemical exposure, temperature, traffic load and other mechanical abuse, immersion service vs. splash-splii, etc.). Consult Sentry Polymers for specific thickness recommendations.

In addition, coverage rates will be effected by the condition of surface being coated (degraded vs. emooth, steel vs. concrete, etc.).

To figure THEORETICAL coverage per gallon, divide desired mill thickness Into 1.604. (For example, theoretical coverage for a 60 mill thickness is: 1.604 divided by 60 = 26.73 square feet per gallon.)

For practical coverage, make necessary ellowances for condition of the substrate, working concluons, westo, spillage, etc.



P. 0. 902 20794 8600 E. XWY 222 FRÉENORT, TX., 77341

+07 000 0012 800 201-2544

JUN 20 TEL LL:DE FROM SK MANIFEST TO 181362(8504 RAGE.000 1225 JUN 20 191 11:42 FROM SK ATUANTA REGIONAL 4 PAGE .004 4092334972-SENT BY: ; 5-17-91 ; 8:12 ; 8136215504;#10 CHEMICAL RESISTANCE GUIDE

This guide is intended as an aid in determining the potential usefumess of SEMSTONE 245 as a protective barrier against chamical exposure. Each application should be evaluated according to its periousar dreumstances and conditions.

KEY: 1 = Suitable for constant immersion

- 2 Suitable for shorter term containment and continual apillage
- 3 = Suitable for Intermittent spills when followed promptly with water flushing
- NR Not recommended

- C = Consult Sentry Polymers
- * = This chamical will attack the silica actregate in the system. When the system is applied,
- be sepacially careful that all aggregate is totally anceasulated with SEMSTONE 245.
- ** * For constant immersion service, costing must be postcured 12 hours at 150*f.
- *** * Coating may show some staining or color change when exposed to this chemical.

	RATING	• • • • • • • • • • • • • •	RAIING		RATING
Acatic Acid, 10%	1	Cyclohexane	2	Naphthalena	
Acontic Acid, 30%		Creionexanci	2	Nitic Acia, 53	2
Acatic Acid, Glacici	â	Creisnasanone	2	Nitria Acid. 30%	3***
Accione	•	Classi Fysi	-	Nicie Acid, 50%	NR .
Acrylic Acid, up to 25-3	5	Ciath Benzana	4		<u>.</u>
	2	· · · · · · · · · · · · · · · · · · ·	÷.		
Acrylonitrile	4	Dimethyl Aniline	÷.	n-Octyl Alcohol	1
Adipic Acid	6 Marah 1	Epichleronycrin	1.	CIB	1
Alum (Aluminum Potassium	Soualej 1	Ethyl Acatala	1	Ctelc Acid	2
Aluminum Chieride	· · ·	Ethyl Acrylata	-	Oleum	2
Aluminum Fluerida	11	Ethyl Alcohol	1	Craik Acid	2
Aluminum Hydroxida	1	Ethyl Benzene	1	Perchloroethylene	:
Aluminum Nitrate	1 -	Elhyl Chieride	1"	Perchlaric Acid	2
Aluminum Sulfate	1	Ethylene Dichloride (EDC)	1	Phenol	2
Ammonia '	2	Ethylene Glycol	1	Phosphoric Acid, 50%	1
Ammonium Siculfita	1	Fetty Acids	1	Phosphoric Acid, 55%	:
Ammonium Chieride	' 1	Ferric Chioride	1 * * *	Phosphorous Acid	2
Ammonium Hydroxide	1	Ferria Nivate	i	Potassium Carbonate	
Ammonium Nizsta	<u>.</u>	Ferrie Sultata		Potassium Chieride	
Ammonium Sulfate	-	Ferrous Chiarida	4	Potassium Dickromete	1 2
narry Alcohol	5	Flugsificic Acid	. 15	Potassium Hycroxide	-
	-	Formaldehyde	1	Potassium Nitrata	-
Aniline Barium Chioride	7	Formic Acid	2	Propionic Acid	-
· · · · · · ·		Fuel Oil	1		4
Barlum Hydroxide	-		-	Silver Nitrate	1-*-
Borium Suifate	3	Gasalmo	-	Skydred	1
Barlum Sulfice	1	Giycarine _		Sodium Acetate	2
Benzano	1	Hensiden	1	Sodium Bicarbonata	1
Benzana Suitonic Acid	1	Hexane	1	Socium Bisuilate	<u>+</u>
Benzoic Acta	1	Hydrobromic Acid	2	Sodium Blactica	1
Black Liquor, Pulp Mill	:	Hydrochlaric Acid, 15%	1	Socium Carbonate	1
Bleach	С	Hydrochloric Acid. 37%	2	Sodium Chiorice	1
Borta Acid	1	Hydrofluoric Acid	1*	Sodium Chlorita	2
Brine	1	Inverogen Percuide	2	Sodium Hydroxide, 10%	-
Bramide, Liquid	NR	Hydrogen Sulfide	1	Sodium Hydroxide, 50%	
Bromide Gas (Dry & Wel)	3	Isopropyi Alcohol	·	Scolum Hypocalorita	ć
Butyl Acetsta	-	Jat Fuel	3	Sockum Sulfata	-
Butyi Acriteto	4	Kerosone	-	Socium Sullice	
n-Butyl Alconol	-	Lactic Acid	5	Slannic Chicrice	÷
Butyl Callosolve Solvent	1	Laury Chloride	1	Stannous Chickde	-
	-	Laad Acatata	-		7
n-Burrie Acid	4			Stearic Acid	:
Cacmium Chlorida	•	Unstad Cit		Sorma	1
Calcium Chloride		Lithium Bromice	· 1	Sugar/Sucrase	1
Calcium Hydraxide	1	Lithium Chiorice	-	Sumar Diexice	-
Calcium Hypoontarita	C	Linkum Hysochichte	Ç	Sulfunic Acid, 10%	:
Galeium Nitrota	. 1	👘 Stahlum Hydroxide	1	Sultarie Acid. 50%	:
Coldum Sulface	-	Magnesium Blauifite	1	Suitarie Aero, 98%	2
Calcium Suints	:	Magnasium Carponata'		TJU CR	:
Carbon Diexide Gas	<u>:</u>	Magnesium Chloride		Tannic Acid	:
Carbon Disouther	2	Magnesium Hydroxide	:	Fartaric Acid	•
Carbon Tatracriance	÷	Magnoeium Sulate	:	Tetrahydroluron	3
Chiorine Dlaude	2	Mainic Acid	2	Totuona	
Chierine Gas (Dry & Watt	3	Mercuric Chiorida	1	Takvene Sulfanic Acid	
Chiorine Water	2	Marcurous Chicride	:	Trichierservite Acid	5
Chierosanana		Mechanol	Ē	TreNersethane	
Chieroform	1.1	Methyl Chicade	2	Tronsoroethylana	
Chromie Asid, 25%	<u>.</u>	Methylene Giorico	1	Trisochum Prosphate	-
Chromic Acid, 50%	2	Moting Euro Astone	- 1	Uraa	2
Copper Nitrata	-	Mathyl Mathemate	1	Water, Deicnized	:
Copper Midiata Copper Sultata	-	Minoral Scatta	1	Water, Cominantized	-
Con Cit	-	Monochierseate Acid		Mater Distiled	-
	:	Monoghanoismine		Xdene	-
Caude Cit, Sour	-		-	Zing Chlorida	
Crude CR. Sweet		Munistic Asic	÷.	Zing Unigrida Zing Sultzia	:
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APPLICATION GUIDELINES

FROM SK ATLANTA REGIONAL 4

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IMPORTANT NOTES

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- 1. Work on vertical surfaces requires the addition of Part C thixotrope.
- For manual applications, use only 1 gallon and 3 gallon units. The mixed material has a very short pot life, so plan your work accordingly.

TEMPERATURE CONSIDERATIONS

- Throughout the application process, the temperature of the surface to be coated should be 35⁴F -95⁴F.
- Below 75°F, the components will thicken noticeably, making manual applications extremely difficult.



 When coeting steel, halt application if the temperature fails within 5°F of the dew point. (This is not necessary when coating concrete.)

4. Eubbles may sppear in the SEMSTONE 245 coating If it is applied over concrete in direct sunlight, or when temperatures are using. This is due to the expansion of air and/or moleture trapped in the concrete. It is especially true of air entrained concrete.

For best results, shade the work area and apply SEMSTONE 245 when temperatures are falling.

5. Store all materials (components A, B, C and aggregate) at 80°F - 90°F for at least 24 hours before use, to facilitate handling.

SURFACE PREPARATION - GENERAL

 Surfaces must be free of dir, cust, cill, grease, chemicals and other contaminants immediately prior to applying each coat of SEMSTONE 245.

For the initial cost, concrete surfaces can be damp.

However, for recoats, all surfaced must be dry.

SURFACE PREPARATION OF CONCRETE

 New concrete generally should be cured a minimum of 28 days.

NOTE: Check with Sentry Polymers for recommendations regarding concrete cured less than 28 days.

- 2. Concrete must be structurally sound and must not contain any accelerators or curing compounds.
- 3. Remove all oil and grease.
- 4. Remove all surface laitance and expose sound concrete. We recommend abrasive blasting to do this.

However, other methods, such as acid etching and neutralizing, may be used.

5. In general, any existing coating should be completely removed.

In certain instances, this may not be necessary, but consult with Sentry Polymers first.

Always remove coatings which have failed due to lack of adhesion or thermal shock.

- Locate all expansion joints, control joints, floor draina, equipment base plates and mid-floor termination points. Handle them as per Sentry's Construction Details.
- Honeycombs or any form voids in versical surfaces must be filled.

Above 50°F, use SEMSTONE 140 with Part C. thixotrope and aggregate edded.

Balow 50%, use SEMSFONE 140-07 with Part C. aggregate added.

8. If the concrete is damp:

a. Flush thoroughly with clear water. Steam or not water is recommended, if available.

b. Remove all standing water.

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SURFACE PREPARATION OF STEEL (NON-IMMERSION SERVICE ONLY)

- Abrasive blast steel surfaces to a near white metal finish with 1 - 2 mil anchor profile. (Ref. SSPC-SP-10)
- All outside corners must be ground smooth and rounded.
- Round all Inside corners to a minimum 1/2" radius, with SEMSTONE ECO Epoxy Putty.

MASKING

Mask surfaces that are not to be coated. This material is difficult to remove, once applied.

APPLICATION EQUIPMENT

1. For spraying, use only a specially equipped plural component rig. Specifications are as follows:

Greco King Hydracat (or equivalent); 28:1 pump; 2.3 GPM, 4:1 mix ratio; inlet air pressure on pump set at 75-120 psi.

Two 15 gallon heated hopper tanks. Set heater at 95°F.

In-line heater on resin outlet, set at 110° F.

High pressure solvent pump.

Insulated hoses, 3/8 in. ID, maximum length of 100 ft.

Grace Silver Gun, or equivalent, equipped with a reversible, saif-cleaning Up, orifice size .035 - .041 inches.

No filters or Internal screens.

- 2. For manual applications:
 - a. Foors preferred method is to apread with servated squeegee, then backroll.

As a second phoice, trowel or brush quuid be used.

b. Walls - use roller or brush.

MIXING AND APPLICATION

- 1. The components must be individually agitated interediately prior to use:
 - Part A Blend each Part A component to a uniform consistency in its individual container, using a Jiffy type mixer.
 - Part B Stir each Part B component to a uniform color in its individual container.
- 2. For work on vertical surfaces, add Part C.

Part C comes in premeasured bags.

For a one gallon unit and three gallon units, add one prameasured beg to each Part A.

For 25 gallon units, add one premeasured bag to each bucket of Part A and each bucket of Part B. (NOTE-There are 4 buckets of Part A and one bucket of Part B in a 25-gallon unit.)

Using a Jiffy type mixer, blend the Part C in until it is evenly dispersed, (about 1 - 2 minutes).

NOTE: Adding Part C darkens the color of SEMSTONE 245 somewhat

3. Skip this step if you are spreying.

If mixing for application by hand:

 Pour Part A into a clean mixing container of adequate capacity.

Add Part B.

Mix thoroughly for two minutes using a Jiffy type mixar.

The pot life of the mixed material will be acout 15 minutes at 80°F. So, use immediately. For work on floors, etc., we suggest that you immediately-dump the mixed material onto the surface and spread it.

NOTE: The premeasured quantities of each component have been carefully set. Any veriation in these promeasured ratios will enversely effect performance. So, mix only complete units. If any of the components are spilled, discard the baton.

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4. Material should be applied in even coats.

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If spraying, use multidirectional passes to insure positive coverage and a proper film build.

If you notice a marbling or streaking effect while spraying, stop immediately. The spray equipment is not mixing the material properly or the mix ratios are incorrect. Check your equipment.

This marcied or streaked material will not cure properly and must be removed. Scrape the material off and then solvent wash the area with MEK or toluene. Alternately, abrasive blasting may be used to remove the moterial. In either case the end result is to have a non-sticky surface to recoat.

- 5. Adding aggregate:
 - a. Horizontal surfaces

To obtain a thicker coating and/or a nonskid finish, aggregate may be broadcast into the coating before it begins to set.

Since SEMSTONE 245 sets quickly, you must plan the work carefully. One worker should apply the coating, and another should follow immediately, broadcasting the aggregate. However, keep the work separated. Do not allow aggregate to be broadcast ahead of the applicator.

Eroadcast aggregate until dry leyer is achieved.

Allow the coating to cure.

Remove the excess aggregate.

Use only clean, dry, bagged and well graded 20/40 mesh silica or quark sand containing not less than 97.5% silicon dioxide. Aggregate may be either round or angular.

When broaccasting aggregate in a large or congested area, it may be depirable for workers to wear spiked shocs to enable them to waik out onto the costing without disturbing it.

An optional topcoat of SEMSTONE 245 may be opplied to protect the aggregate and optisin a more clashable surface. The topcoat should be of nest material applied at a cover rate of 150-160 sq. ft. per gallon. The surface must be kapt dry and free of contamination prior to applying this topcoat.

b. Vertical surfaces

FROM SK ATLANTA REGIONAL

- Refer to Santry's supplemental guidelines for adding Part C and sand.

- 6. Prepare surfaces for intercoat adhesion as follows:
 - a. Allow SEMSTONE 245 to cure until failed before recoating.
 - b. If the surface has cured firm to the touch, but less than 24 hours, it must be washed with soap and water, rinsed and dried before recoating.
 - c. Surfaces cured beyond 24 hours must be washed with soap and water, finsed, dried and lightly sanded or sorasive blasted.
 - d. Important: While SEMISTONE 245 can be applied over damp concrete, for recoating, the surface
 must be dry.
 - 7. Post-curing for Immersion service in chlorineted solventa:

The coating must be postcured if it will be used for continuous immersion service in chlorinated solvents.

Tarp the coated area and heat it at 150°F for at least 12 hours.

8. Spark Testing Steel

Spark testing is recommended for coated steel In immersion service.

Voltage setting > 1250 x V Coating Thickness (in mils)

 If work is interructed, and at the end of the day, terminate the costing in a straight line.

CLEANUP

Clean all tools and equipment with Xylene. MER or toluene.

FROM SK ATLANTA REGIONAL 4

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SAFETY PRECAUTIONS

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FOR INDUSTRIAL USE ONLY.

Both the mixed product and its separate A and B components can be extremely irritating to skin, eyes and the respiratory system.

Avoid contact with eyes and skin; do not ingest or Inhale.

When scraying in a confined area, wear a frash air head and make provision for forced ventilation.

NOTES:

At all other times, wear a NIOSH approved respirator suitable for organic vapors when working with this product or its components.

When working with SEMSTONE 245, always wear chemical gogglas, nubber gloves, and appropriate work clothing.

Prolonged or repeated exposure to the unreacted Part A and Part B components of SEMSTONE 245 may cause skin irritation or allergic reactions.

Refer to material safety data sheets regarding inclvidual components.

SEMSTONE 245 + 2 -27.

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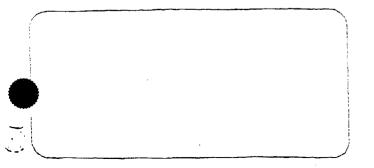
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HOTICE TO CUSTOMERS

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TYPICAL PROPERTIES:

Solids, by Volume	100%
Color	Buff (Selected other colors optional)
Weight per Mixed Gallon	10 ibs.

Cure Times (Approximate):

Temperature	Foct Trattic	Chemical Service
35°F	24 hrs	7 days
55°F	8 hrs.	43 hrs.
80°F	4 hts	24 hrs.

"For Immersion service in chlorinated solvents, the coating must be postcured at 150°F for 12 hours.

RELATED AND ANCILLARY PRODUCTS:

SEMSTONE 140 Epoxy Floor Topping SEMSTONE 140-CT Epoxy Floor Coating - Cold Temperature Formulation SEMSTONE 140-S Epoxy Coating and Lining SEMSTONE 300 Epoxy Polymer Concrete SEMSTONE 500 Epoxy Putty SEM-CRETE Rapid Hardening Underlayment Mortar

Refer to separate technical bulletin on such products for its uses, application instructions, etc.

STORAGE AND SHELF LIFE:

Keep SEMSTONE 245 components tightly sealed in their original containers until ready for use. Store unopened at 50°F-90°F, out of direct sunlight. At least 24 hours immediately prior to use, store all components (A, B, C, and aggregate) at 80°F-90°F, to facilitate handling.

Properly stored, SEMSTONE 245 has a minimum shelf life of one year. Refer to batch number on label for date of manufacture.

ATTACHMENT II.B.3

WASTE SEGREGATION



ATTACHMENT II.B.3 WASTE SEGREGATION

PROCEDURE FOR SEGREGATING WASTE TYPES

The used solvents are compatible with each other and with other materials handled at this facility with respect to reactivity and therefore do not require special segregation procedures. However, the wastes are the primary source of feed stock for regenerating the clean solvents. For ease of inventory control and product integrity, separation and grouping of both used and unused solvents is a standard practice at the facility. Safety-Kleen uses a container color scheme as a part of its waste management system. Eighty-five-gallon overpack containers are used to manage containers whose integrity have been compromised.

All materials are managed in accordance with the local fire protection code and fire department recommendations.

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

The dry cleaning wastes are contained in containers. The liquids are in polyethylene or steel containers. Filters are in steel containers. These containers are managed similarly to the used immersion cleaner containers, and contents within the containers will not be removed or processed at the facility.

The mineral spirits are collected in containers. These containers are then emptied into the dumpsters in the return/fill shelter. Spent antifreeze is packaged in containers.



Paint wastes are stored in containers. The contents within these containers will not be transferred or processed at the service center. The paint waste is not removed from the containers until receipt by a reclaimer.

Eight solvents are collected from FRS waste users: mineral spirits; 1,1,1trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro- 1,2,2trifluoroethane; lacquer thinners, and waste oil exhibiting a characteristic. These wastes, except waste oil, are shipped in containers and are stored on pallets. It is anticipated that 38,600 gallons of spent mineral spirits, 157,600 gallons of spent halogenated solvents, and 60,400 gallons of spent lacquer thinners will be shipped from the accumulation center to a reclaimer on an annual basis.

The 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. Figures II.B.3-1 through II.B.3-4 show typical detailed construction specifications of the 16-gallon containers. The containers used to store cleaning wastes are shown in Figures II.B.3-5 through II.B.3-7. Paint containers are shown in Figure II.B.3-8.

Wastes are stored in polyethylene and steel containers. Since none of the waste handled by Safety-Kleen reacts with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste containers are never opened at the branch, and none of the wastes are incompatible.

POTENTIAL FIRE SOURCES

The following is a list of fire prevention and minimization measures:

1. <u>All wastes and products are kept away from ignitable sources</u>--Personnel must confine smoking and open flames to remote areas (e.g., the office or locker room),



Revision 2 - 12/06/91

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separate from any solvent. The mineral spirits handling area and the aboveground storage tanks are separate from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

- 2. Ignitable wastes are handled so that they do not:
 - a. <u>become subject to extreme heat or pressure</u>, fire or explosion, or a <u>violent reaction</u>--The mineral spirits waste is 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.
 - b. <u>produce uncontrolled toxic mists</u>, fumes, dusts or gases in quantities <u>sufficient to threaten human health</u>--The vapor pressure of mineral spirits is low (2 mm) and it is reactive with strong oxidizers 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.
 - c. produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See "a" above and "d" below.
 - d. <u>damage the structural integrity of the Safety-Kleen facility</u>--The solvents stored at this facility will not cause deterioration of the tank, containers, or other structural components of the facility.
- 3. <u>Adequate aisle space is maintained</u> to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.



II.B.3-3

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- 4. "NO SMOKING" signs are posted in areas where solvents are handled or stored.
- 5. <u>Fire extinguishers must be checked</u> once per week and tested by the fire extinguisher company once per year.

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 container storage area is in a building which is inaccessible to unauthorized personnel.

- 1. <u>Vandalism</u>--Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.
- 2. <u>Strikes</u>--A strike would not result in a solvent spill or fire.
- 3. <u>Power failure</u>--A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.
- 4. <u>Flooding</u>--The site elevation is above the projected 100-year floodplain.
- 5. <u>Storms or Cold Weather</u>--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.



ATTACHMENT II.B.4

CONTAINER MANAGEMENT



ATTACHMENT II.B.4 CONTAINER MANAGEMENT

The immersion cleaner is always contained in partially filled, covered containers before, during, and after it use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the facility and stored in the designated container storage areas before shipment to the recycle facility.

The dry cleaning wastes are contained in containers. The perchloroethylene from dry cleaning operations is collected in polyethylene containers. The dry cleaning filters are in steel containers. These containers are managed similarly to the used immersion cleaner containers, and contents within the containers will not be removed or processed at the facility.

The spent antifreeze is packaged in containers, and the containers are not opened at the facility. The mineral spirits are collected in containers which are poured into the dumpsters. Paint wastes are stored in containers. The contents within these containers will not be transferred or processed at the service center. The paint waste is not removed from the containers until receipt by an offsite reclaimer.

The 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. Figures II.B.3-1 through II.B.3-4 showed typical detailed construction specifications of the 16-gallon immersion cleaner containers. The containers used to store dry cleaning wastes were shown in Figures II.B.3-5 through II.B.3-7. Paint waste containers were shown in Figure II.B.3-8. Table II.B.4-1 provides a list of the containers used at the facility.



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TABLE II.B.4-1

SAFETY-KLEEN CORP. WASTE STREAMS AND CONTAINER SIZES BOYNTON BEACH, FLORIDA

Waste Stream	Container Sizes (gallons)	Construction Material of Container						
Mineral Spirits	5	Polyethylene						
	16	Steel						
	30	Steel						
Dry Cleaner (including off	5	Steel						
specification perchloroethylene)	13.5	Polyethylene						
peremoroeuryrene)	15	Steel						
	16	Polyethylene						
	16	Steel						
	Split 30 (also known as 20-gallon)	Steel						
Immersion Cleaner	16	Steel						
Paint Waste	5	Steel						
	16	Steel						
Ethylene Glycol	30	Steel						
	55	Steel						
Fluid Recovery	30	Steel						
Service (FRS) Waste	55	Steel						
Dumpster Mud/Tank Bottoms	16	Steel						
THUR THIS DOUDINS	30	Steel						
Overpack	85	Steel						
	85	Polyethylene						



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Seven FRS wastes are collected from FRS waste users: mineral spirits; 1,1,1trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro- 1,2,2trifluoroethane; lacquer thinners, and waste oil exhibiting a characteristic. These wastes, except waste oil, are shipped in containers and are stored on pallets.

Wastes are stored in polyethylene and steel containers. Since none of the wastes handled by Safety-Kleen react with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste containers are never opened at the branch, and none of the wastes are incompatible.

Containers will be double-stacked. The containers will be arranged so that a two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling. Since all materials handled by Safety-Kleen are compatible with one another, no specific areas have been designated for specific wastes. Wastes will be grouped by type and are distinguishable by the color of the container; however, since the actual volume present of any product at a given time varies greatly, it is not practical to assign specific locations to given wastes.



ATTACHMENT II.B.6

CONTAINER CLOSURE PLAN



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ATTACHMENT II.B.6 CONTAINER CLOSURE PLAN

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. Onsite disposal does not occur at any plant and hence there is no disposal capacity to be exhausted that will necessitate closure of a facility. Based on current business and facility conditions, this facility is expected to remain in operation beyond the year 2000.

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

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

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

An anticipated closure schedule can be seen in Figure II.B.6-1. An anticipated maximum waste inventory for the container storage portion of the facility is presented in the following section.



FACILITY DATA

Container Storage Area:

The container storage area has a 48' x 78' area with a sloped floor and collection sump. The maximum total volume of product and waste stored is 29,720 gallons with 6,912 gallons anticipated to be containers of waste mineral spirits dumpster mud, dry cleaner wastes, antifreeze, paint waste, immersion cleaner, and/or FRS wastes.

MAXIMUM INVENTORY OF WASTE

Containerized Waste: Anticipated maximum of 6,912 gallons of waste.

This amount includes any combination of 5-, 15-, 16-, split 30- (also known as 20-gallon), 30-, 55-, and 85-gallon containers.

CLOSURE PROCEDURE

Container Storage Areas

The container storage area houses containers of used immersion cleaner, mineral spirits dumpster mud, dry cleaning wastes, antifreeze, paint waste, and FRS wastes.

- At closure all containers will be removed and transported to the recycle center with proper packaging, labeling, and manifesting where the contents in the containers will be reclaimed and the containers will be cleaned for reuse.
- The concrete floor and spill containment areas will be cleaned with detergent solution and the rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium using SW-846 methods to determine the effectiveness of decontamination. The area will continue to be washed and rinsed until levels are below maximum contaminant levels (MCLs), or if MCLs are not available, practical quantitation limits (PQLs) as specified in Appendix IX of 40 CFR 264.



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- If the wash water or other wastes generated in the closure 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 <u>not</u> be allowed to drain to the waterway. It is anticipated that approximately 350 gallons of rinsate will require RCRA disposal.
- The equipment 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 hose will be washed with a detergent solution to decontaminate it. The containers will be used to store the wastewater.

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 during which wastes are periodically received.) Safety-Kleen shall amend the plan any time changes in operating plans or facility design affect the closure plan or whenever there is a change in the expected year of closure of the facility. The plan must be amended within 60 days of the changes.
- Safety-Kleen shall notify the state authority at least 180 days prior to the date closure is expected to begin, except in cases where the facility's permit is terminated or if the facility is otherwise ordered by judicial decree or compliance order to cease receiving wastes or to close. The date when Safety-Kleen "expects to begin closure" should be within 90 days after the date on which Safety-Kleen expects to receive the final volume of wastes.
- Within 90 days of receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, Safety-Kleen shall remove from the site



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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

The following requirements are met:

- ▶ The facility has the capacity to receive additional wastes;
- ► There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
- Closure of the facility would be incompatible with continued operation of the site; and Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen shall complete closure activities in accordance with the approved closure plan and 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 will be properly disposed of, or decontaminated by removing all hazardous waste and residues.
- When closure is completed, Safety-Kleen shall submit to the Regional Administrator a certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.



G

PART II C

TANK SYSTEMS



ATTACHMENT II.C.1

ENGINEERING ASSESSMENT OF TANK SYSTEM



TERA Report No. 91-208-1

DESIGN AND INSTALLATION ASSESSMENTS USED ANTIFREEZE STORAGE TANK SYSTEM BOYNTON BEACH, FLORIDA

For

SAFETY-KLEEN CORP. Elgin, Illinois





6440 Hillcroft, Suite 200 P.O. Box 740038, Houston, Texas 77274, Tel. 713/772-0876, Fax: 713/981-7713

91-208-1

TANK SYSTEM CERTIFICATION

I have supervised the design and installation assessments dated November 21, 1991, of the used antifreeze storage tank systems at the Safety-Kleen Corp. facility in Boynton Beach, Florida. The EPA ID Number for this facility is: FLD984167791.

With regard to this duty, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all related attachments and that, based on my observations and my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

> Wendell R. Vines Registered Professional Engineer Florida No. 37464 TERA, Inc. P. O. Box 740038 Houston, Texas 77274

ANNIN MANNESS Signed: Date: (fetteresteres)



6440 Hillcroft, Suite 200 P.O. Box 740038, Houston, Texas 77274, Tel. 713/772-0876, Fax: 713/981-7713

> November 21, 1991 91-208-1

SAFETY-KLEEN CORP. 777 Big Timber Road Elgin, Illinois 60123

Attention: Ms. Melissa Hlebasko

Subject: Design and Installation Assessments Used Antifreeze Storage Tank System Boynton Beach, Florida

Dear Melissa:

Submitted here is our design and installation assessments report for the used antifreeze storage tank system at your Boynton Beach facility. The main report body summarizes assessment results in a format corresponding to the rules being addressed. Appendices are used for presenting detailed information.

We have enjoyed working with you on this interesting project, and look forward to another opportunity to be of service to Safety-Kleen. Please contact us at 713/772-0876 if you have any questions.

Very truly yours,

TERA, Inc.

Wendell R. Vines, P.E. President

WRV/lf

Enclosures: Eleven (11) Copies



DESIGN AND INSTALLATION ASSESSMENTS USED ANTIFREEZE STORAGE TANK SYSTEM BOYNTON BEACH, FLORIDA

* * *

For

SAFETY-KLEEN CORP. Elgin, Illinois

* * *

Вy

TERA, Inc. Houston, Texas

November 1991

6

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6

This report documents the design and installation assessments for the used antifreeze storage tank system at the Safety-Kleen facility in Boynton Beach, Florida. The assessments described here are written to address the requirements of 40 CFR 264.192 and 40 CFR 264.193, and Florida DER Regulation 17-30.180.

SYSTEM DESCRIPTION

Used antifreeze liquids will be received from offsite generators in tank trucks. The hose from the truck is connected to a tanker hookup located in the secondary containment of the tank farm building. The truck pump transfers the used antifreeze via aboveground piping into an aboveground steel storage tank of 20,000-gallon capacity. Accumulated used antifreeze will be evacuated periodically from this tank via a tank truck pump through the aboveground piping to the tank truck for transport to an offsite recycling center. Sludge and solids that accumulate in the tank will be removed periodically through a manway for offsite disposal. All of the ancillary equipment for this system is located in the tank containment area.

For the purpose of this assessment, the used antifreeze storage system has been defined to include the storage tank, the aboveground piping, the ancillary equipment, and the secondary containment system for these components. The system was originally constructed as a used oil system and has been converted to a used antifreeze system before putting the system into service.

The 20,000-gallon storage tank for the used antifreeze is a horizontal tank with integral saddle supports. The tank is located inside a steel-reinforced concrete containment area which is coated for impermeability. The used antifreeze storage tank is vented to the

<u>SYSTEM DESCRIPTION</u> (Continued)

atmosphere. Exhault fans (32" x 32") are mounted at each end of the building for air circulation. Tank liquid level is to be monitored daily by reading a level indicator. The tank is also equipped with a high level alarm to provide a warning to service center personnel when the tank is approximately 95% full. Emergency venting is to be provided by a 24-inch loose-bolt manway on top of the tank.

Documents further describing the used antifreeze storage system are attached at Appendix A.

A local area map for Boynton Beach, Florida, and a site plan for the facility are shown on Plates 1 and 2. A Flood Map is shown on Plate 3. A schematic drawing of the used antifreeze storage tank system is shown on Plate 4.

CONSIDERATIONS OF DESIGN ASSESSMENT

1. <u>Design Standards</u> (40 CFR 264.192(a) and 40 CFR 264.193))

Design standards and materials of construction were determined from construction drawings for the system. Information made available for this purpose is listed in Appendix A.

This tank system design has been reviewed for compliance with the following applicable codes:

- Underwriters' Laboratory, UL 142, Standard for Steel Aboveground Tanks for Flammable and Combustible Liquids, 6th Ed. (tank)
- American Concrete Institute, ACI 318-89, Building Code Requirements for Reinforced Concrete (containment)

- 1. <u>Design Standards</u> (40 CFR 264.192(a) and 40 CFR 264.193)) (Continued)
 - American Society of Civil Engineers, ASCE 7-88, Minimum Design Loads for Buildings and Other Structures, (Formerly ANSI A58.1) (tank environmental response analyses).

Calculations, discussions and checklists which evaluate compliance with these codes for primary considerations are given in Appendix B. The design review shows that:

- The design substantially conforms to the standards referenced above;
 - .The design standards are appropriate for this application.

Descriptions of the concrete coating and caulking materials and application procedures used by Safety-Kleen for the tank secondary containment are referenced in Appendix A. This information indicates that the materials should be satisfactory for the intended service, provided recommended procedures were followed by the applicator.

The conclusion upon review of the documents is that the design of the used antifreeze storage tank system is appropriate for the intended service. The structural system, support, and seams appear to be adequately designed.

2. <u>Hazardous Characteristics of the Waste</u> (40 CFR 264.192(a)(2) and 40 CFR 264.193)

The waste material to be collected and stored by this system will be antifreeze liquids which consist primarily of ethylene

2. <u>Hazardous Characteristics of the Waste</u> (40 CFR 264.192(a)(2) and 40 CFR 264.193) (Continued)

glycol and water picked up in various automotive service centers and commercial users. The material is a single-phase liquid at ambient temperatures. Documentation describing the waste material is included in Appendix C.

The primary hazardous characteristic of the waste is toxicity by characteristic leaching procedure standards (D004-D011, D018, D019, D021-D030, D032-D043), EPA Hazard Code E.

3. <u>Corrosion Protection</u> (40 CFR 264.192(a)(3))

The steel tank, protected with a paint coating on its exterior, is inside a building. All associated piping is also painted and inside the building.

System components are not provided with internal corrosion protection.

A literature search by TERA for test data which confirms compatibility of the waste antifreeze and water mixture with the carbon steel elements of this tank storage system has not been fruitful. However, due to the usual presence of rust inhibitors in manufactured antifreeze and the world-wide use of antifreeze mixed with water as a coolant for internal combustion engines, there is ample reason to believe that the used antifreeze stored in this tank system is not corrosive to steel alloys.

3. <u>Corrosion Protection</u> (40 CFR 264.192(a)(3)) (Continued)

Safety-Kleen states that they have been intensively investigating all aspects of the marketing, handling, and storage of used antifreeze for the past three years. The company reportedly has conducted extensive chemical analyses of the various compo-sitions of used antifreeze expected to be stored in this system and has evaluated the compatibility of used antifreeze with the usual materials of construction normally employed for a hazardous waste storage system at their service centers. Safety-Kleen has determined that used antifreeze is compatible with those materials without the need for special liners or other protection against internal corrosion. A letter from Safety-Kleen is included in Appendix C.

External metal components of this tank system are not in long-term contact with soil or water. Therefore, the tank system will not require cathodic protection.

It is therefore concluded that the used antifreeze waste materials are sufficiently compatible with the system materials of construction to not require additional corrosion protection.

4. <u>Effects of Vehicular Traffic</u> (40 CFR 264.192(a)(4))

No underground components are used in this system, and no adverse effects from vehicular traffic under normal conditions have been identified.

5. <u>Foundation Design</u> (40 CFR 264.192(a)(5))

The foundation support for the used antifreeze storage tank is provided by a reinforced concrete slab. As shown in the calculations included in Appendix B, the foundation design for the new tank components appears to be sufficient to maintain a full liquid load. The branch site is in a zone of low seismic activity (Zone 0 from ASCE 7-88) and the tank will not require special anchorage for earthquakes. See Appendix B for seismic calculations. Wind forces on the tank are not expected since the system is inside a building.

6. <u>Tank Installation Assessment</u> (40 CFR 264.192)

A. <u>Installation Inspection</u>

After installation and prior to being placed in service, the new tank system was inspected by TERA for defects and compliance with the design documentation. No discrepancies were identified between design documentation and observed features of the tank system. No indications were found of any weld breaks, punctures, scrapes of protective coatings, cracks, corrosion, structural damage inadequate or construction or installation. The tank and piping wall thicknesses were also verified by ultrasonic thickness measurements. Documentation of the inspections performed is included in Appendix D of this report.

B. <u>Tightness Testing</u>

The new tank system components were tested for tightness prior to being placed in service. Tightness testing consisted of pneumatic leak testing of the tank and system piping.

- 6. <u>Tank Installation Assessment</u> (40 CFR 264.192) (Continued)
 - B. <u>Tightness Testing</u> (Continued)

Documentation of the testing performed is included in Appendix D. There was reportedly no evidence of leakage from any of the system components during final tightness testing.

SECONDARY CONTAINMENT ASSESSMENT

The following paragraphs give a detailed comparison of containment system features to current requirements. This evaluation considers only the used antifreeze tank system containment area. For brevity, "secondary containment" as used here means features that meet the requirements of 40 CFR 264.193.

1. <u>Required Date</u> (40 CFR 264.193(a)(3))

Since this system is new, secondary containment is required prior to placing the tank system in service. As discussed in subsequent paragraphs, secondary containment has been provided.

2. <u>Materials Compatibility</u> (40 CFR 264.193(c)(1))

The waste material collected and stored by the system is to be a used antifreeze liquid which consists primarily of ethylene glycol and water received from various automotive service operations and commercial users. The primary hazardous characteristic of the waste is toxicity. As noted earlier, this material is compatible with and not corrosive to the system materials of construction (primarily concrete, polyurethane caulking, epoxy coating and carbon steel).

SECONDARY CONTAINMENT ASSESSMENT (Continued)

3. <u>Strength</u> (40 CFR 264.193(c)(1))

The most critical strength requirement for the floor slab of the tank containment structure is to be its service as foundation support for the used antifreeze tank when full (used antifreeze has a higher specific gravity than either clean or used solvent). Loading from the tank is higher than any expected hydrostatic pressure. As shown in the calculations in Appendix B, the strength of the floor slab appears to be adequate.

The most critical strength requirement for the concrete containment walls is from hydrostatic pressure with the containment full of ethylene glycol. As shown in Appendix B, the strength of the containment walls appears to be adequate.

The pressure containment capacity of the piping and other ancillary equipment items was reviewed and found to be adequate for the intended service.

4. <u>Foundation</u> (40 CFR 264.193(c)(2))

The foundation for the secondary containment vault, tanks and their contents is the soil subgrade and aggregate subbase described in Appendix A. A check of the subgrade bearing pressure shows maximum loads on the subgrade to be less than specified bearing capacity (see Appendix B).

5. <u>Leak Detection</u> (40 CFR 264.193(c)(3))

All components of this system are aboveground and are directly accessible for visual inspection.

<u>SECONDARY CONTAINMENT ASSESSMENT</u> (Continued)

6. <u>Liquid Removal</u> (40 CFR 264.193(c)(4))

The tank containment system is sloped to drain to sumps at each end of the containment structure. Liquid removal is accomplished by hand pumps or vacuum trucks.

7. <u>Device Requirements for Vault</u> (40 CFR 264.193(e)(2))

As shown by the calculations in Appendix B, containment for the tanks will have a design volume sufficient to hold 100 percent of the used antifreeze tank capacity. Since the system is inside a building, additional containment for rainfall is not required. Therefore, containment capacity for the storage tank system is considered sufficient.

Chemically-resistant external waterstops were formed where necessary at joints in the concrete walls by the application of Sika Flex-la joint sealant, described by concrete construction details and manufacturer's literature in Appendix A.

The tank concrete containment structure for the tanks has been coated with Sikagard 62 epoxy coating. As shown in the manufacturer's literature in Appendix A, this material is expected to be impermeable to and compatible with the waste antifreeze being stored. A few spots where the Sikagard 62 has flaked will require touch-up.

<u>SECONDARY CONTAINMENT ASSESSMENT</u> (Continued)

8. <u>Ancillary Equipment</u> (40 CFR 264.193(f)(1))

The piping for the used antifreeze system is aboveground. All ancillary equipment including piping are located within the containment structure. The pressure containment capacity, support, and protection of ancillary equipment appears to be designed satisfactorily.

CONCLUSIONS OF ASSESSMENTS

Based on the information included in this report, the used antifreeze storage system at the Safety-Kleen facility in Boynton Beach, Florida, appears to have been adequately designed to have sufficient structural strength and to be sufficiently compatible with the wastes being stored to not leak, collapse, rupture, or fail in their intended service. No evidence of damage, defects or improper installation was found, and tightness test records show no indications of leakage. A secondary containment system is provided that appears to meet the requirements of 40 CFR 264.193, except that secondary containment coating touch-up should be accomplished before the system is put into service.

ILLUSTRATIONS

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ILLUSTRATIONS

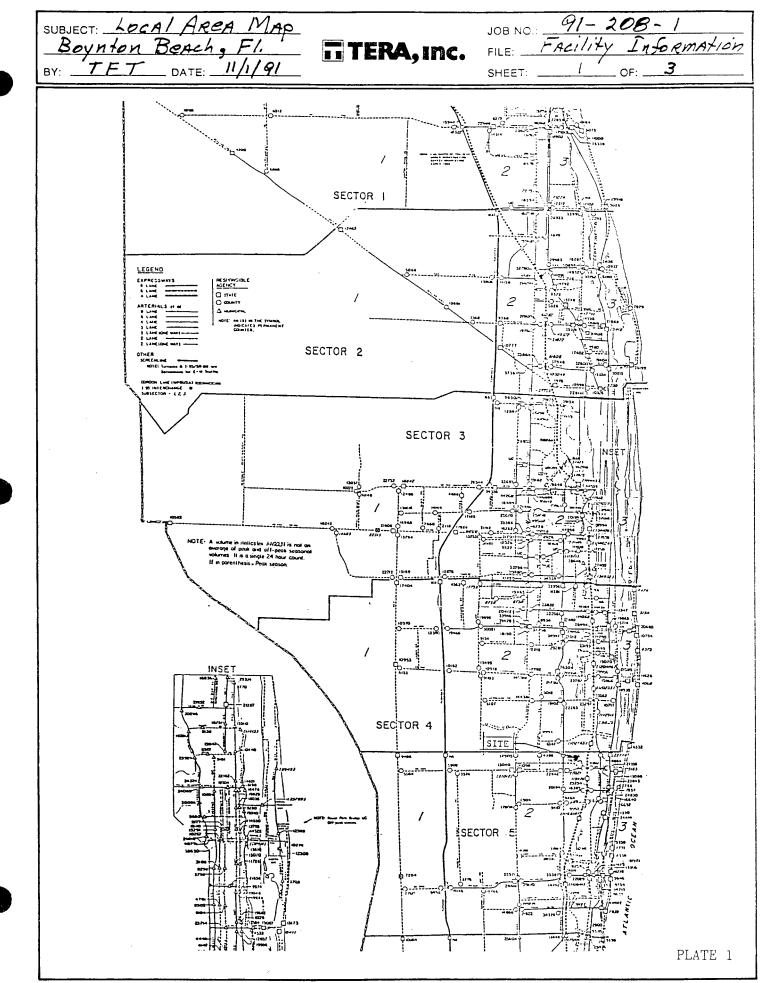
TABLE OF CONTENTS

<u>Title</u>

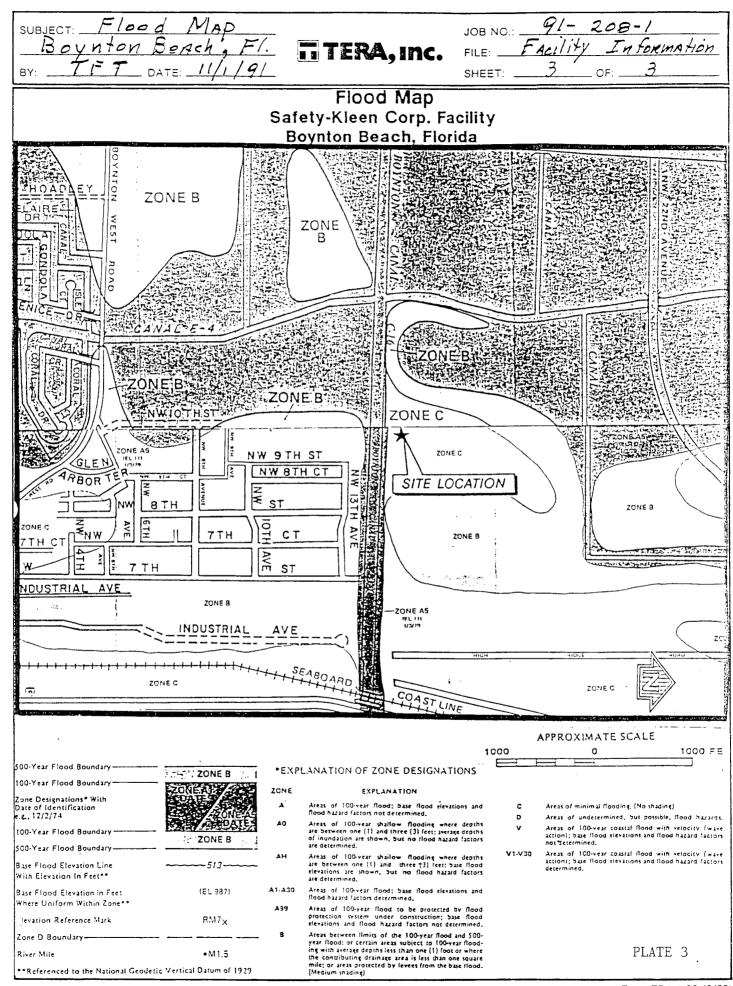
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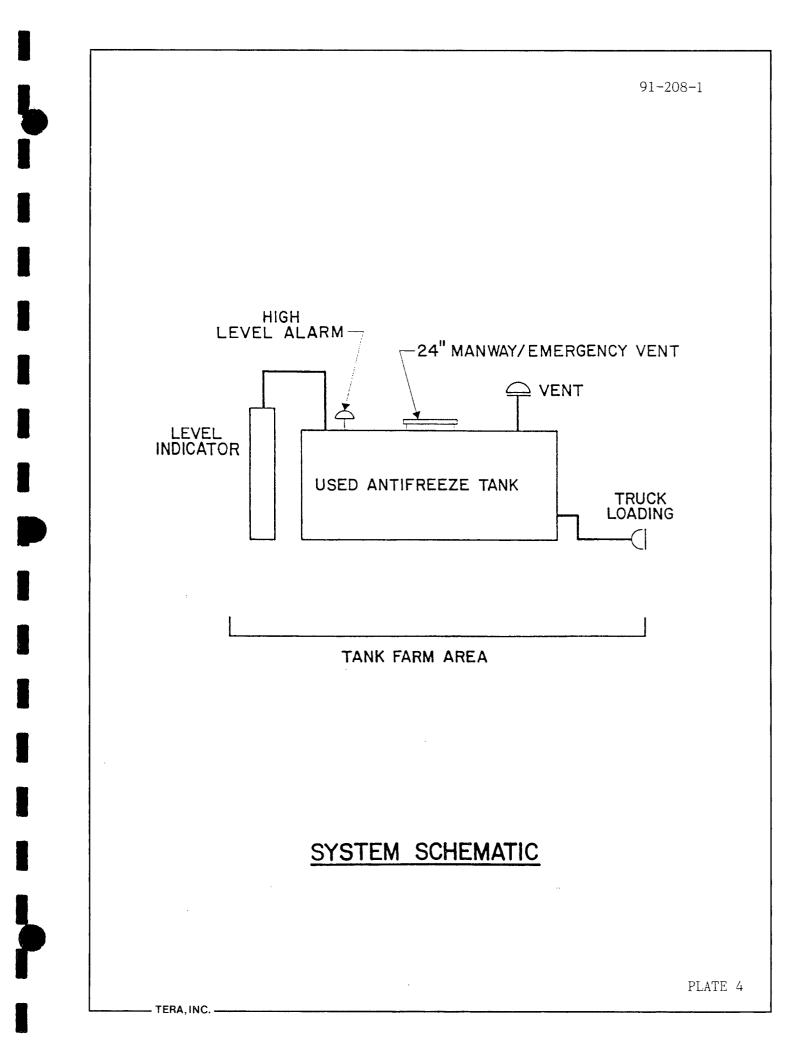
<u>Plate No.</u>

Local Area Map	• •	•	• •	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	1
Site Plan		•		•	•		•		•	•	•	•	•	•	•			•	•	•	•	•	2
Flood Insurance	Rate	e Ma	ар		•	•		•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	3
System Schematic	:, Us	sed	An	tii	Ere	eez	e	Ta	ink	τ					•							•	4



SUBJECT: <u>Site Plah</u>	JOB NO.: <u>91-202</u>	B - 1
<u>Boynton Beach, Fl.</u>	FILE: <u>Freility</u>	In <u>G</u> RMAT
BY: <u>TFT</u> DATE: <u>11/1/91</u>	SHEET: <u>2</u> OF:	3
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APPENDIX A Design Documentation

5

APPENDIX A

Design Documentation

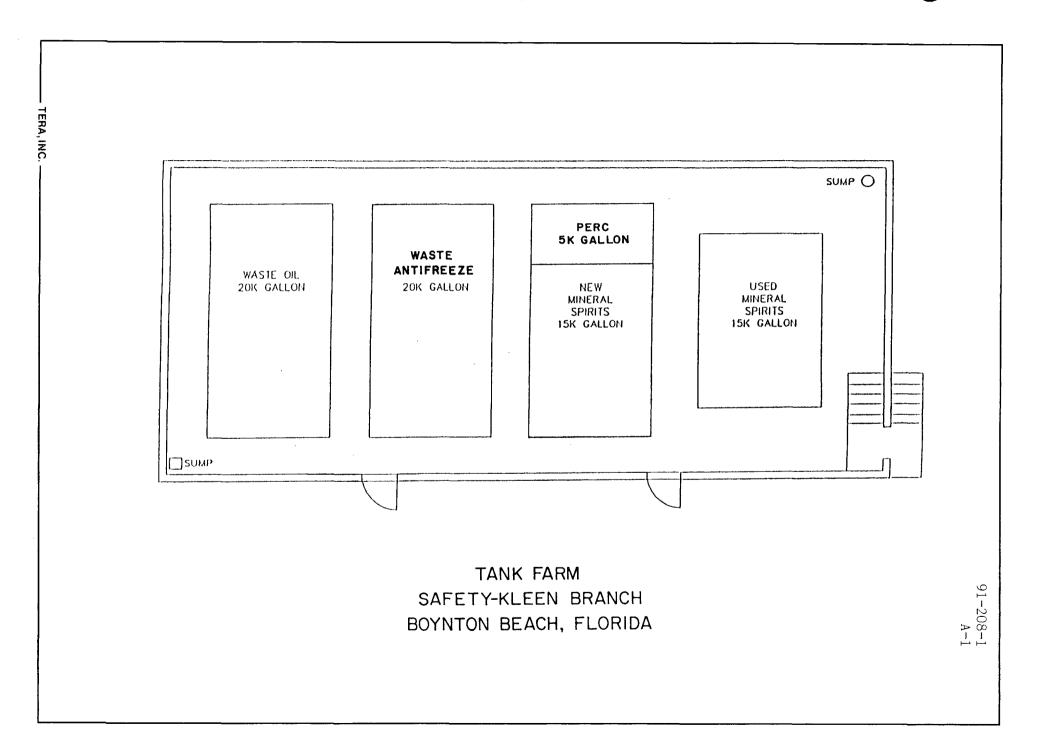
The information is this Appendix was provided by Safety-Kleen to TERA for purposes of this design assessment as being representative of in-place details. The inspection was limited to externally visible features and showed general conformance to these drawings. Where non-accessible details were needed in the assessment, such as reinforcement of concrete, they were assumed to be as shown here.

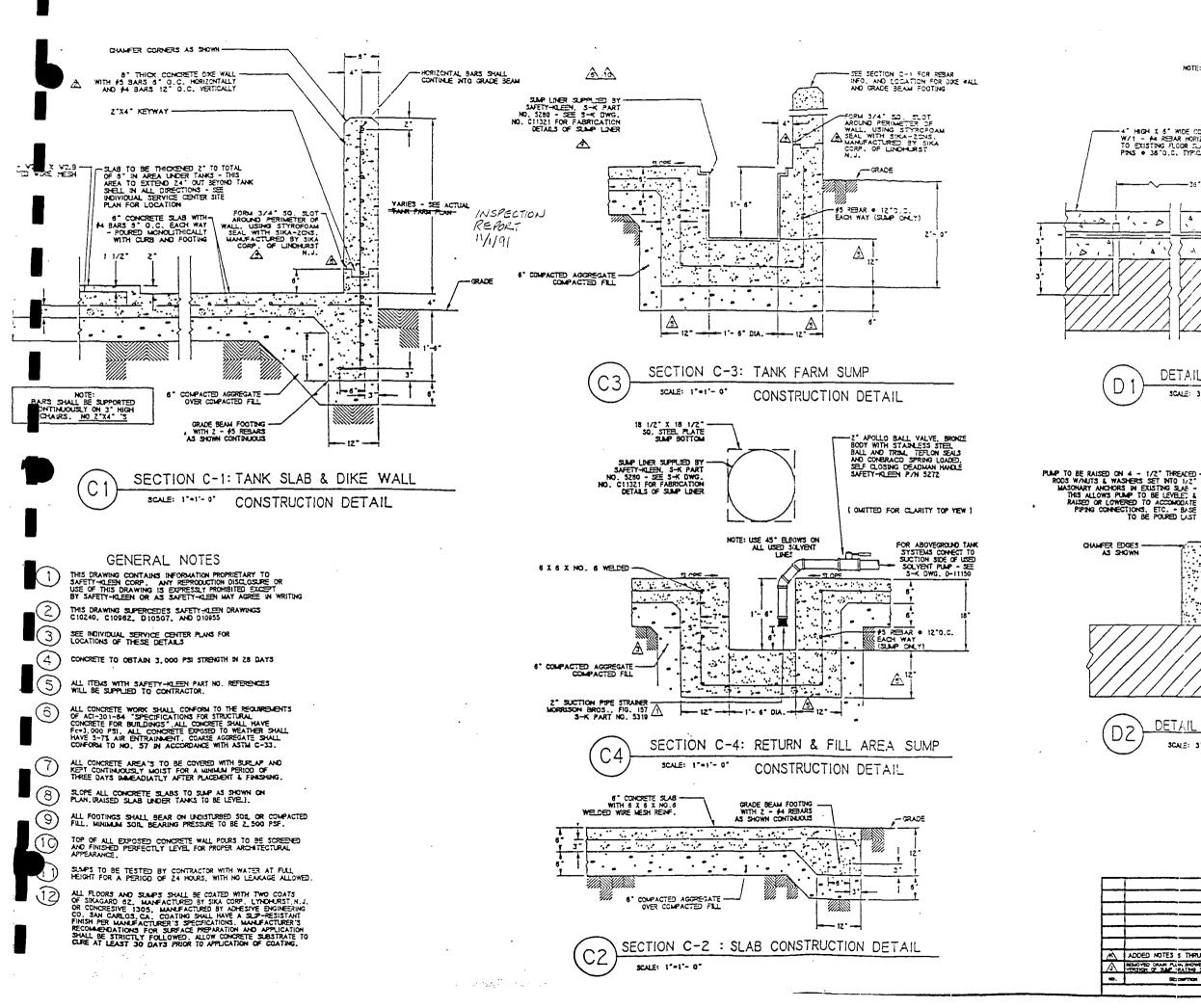
TABLE OF CONTENTS

<u>Title</u>

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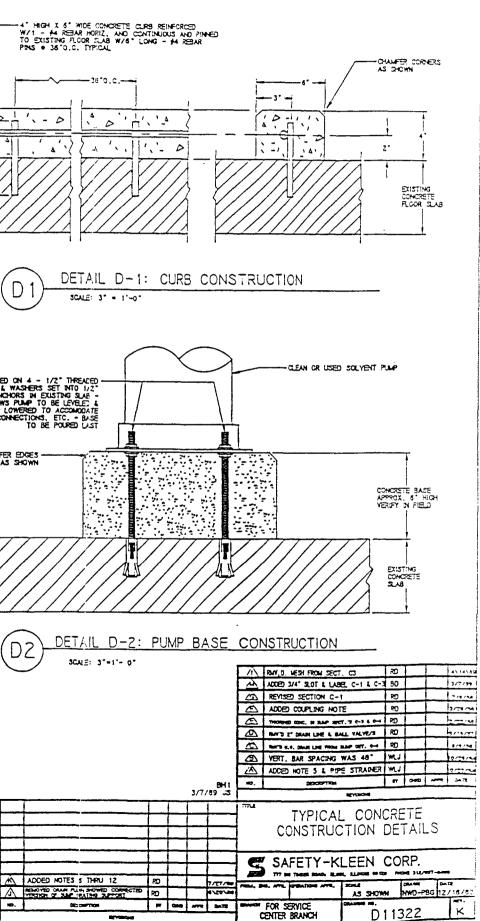
Tank Farm Plan	A-1
Typical Concrete Construction Details D11322	A - 2
20,000 Gallon Horizontal Steel Aboveground Storage Tank	
Drwg. No. D12966	A-3
Emergency & Gate Valve Installation Details	A-4
High Level Alarm System - D13102	A-5
Moormann Bros. Tank Gauge Installation Al0243	А-б
Caulking/Coating Data	A-7



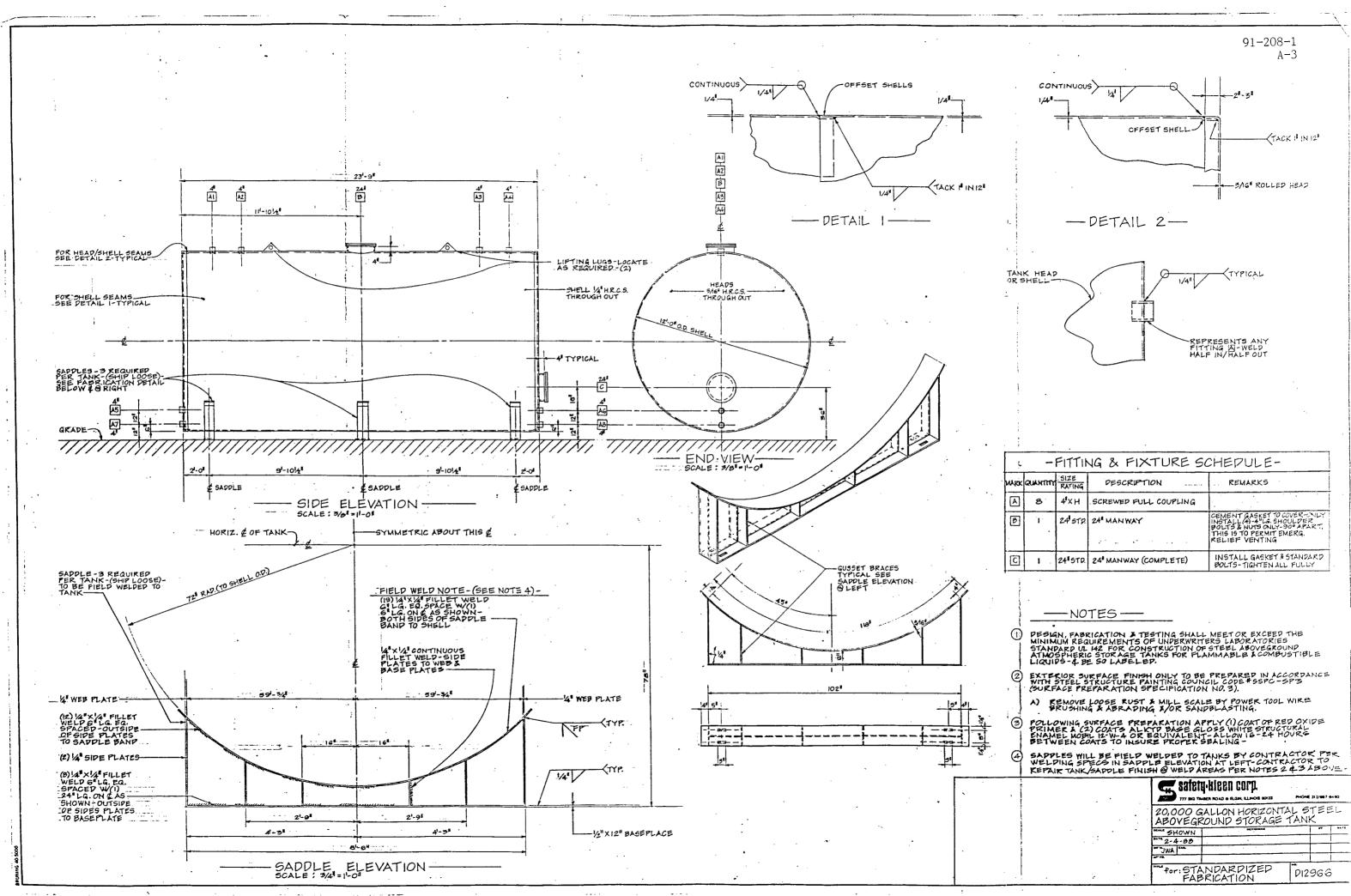


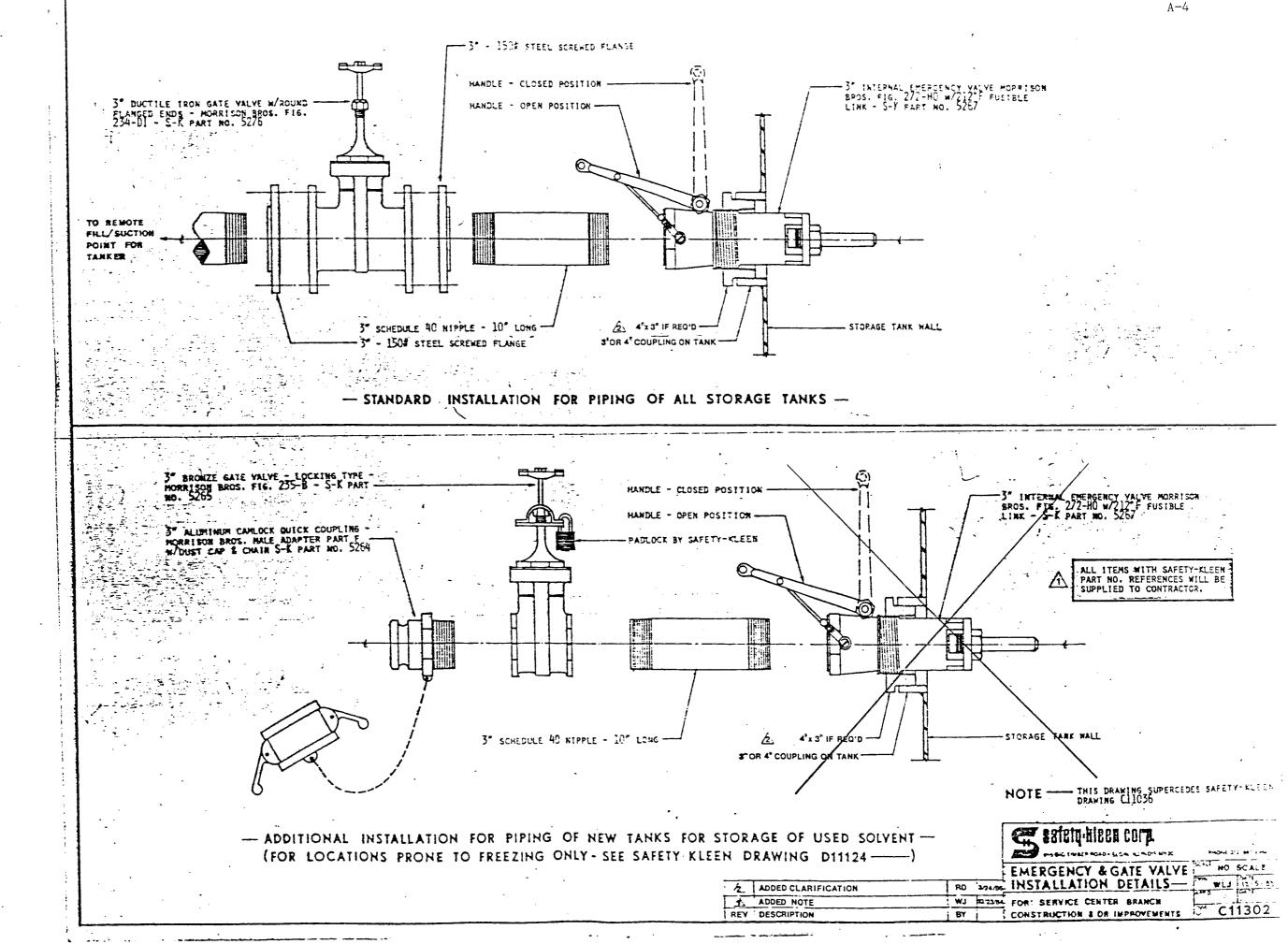


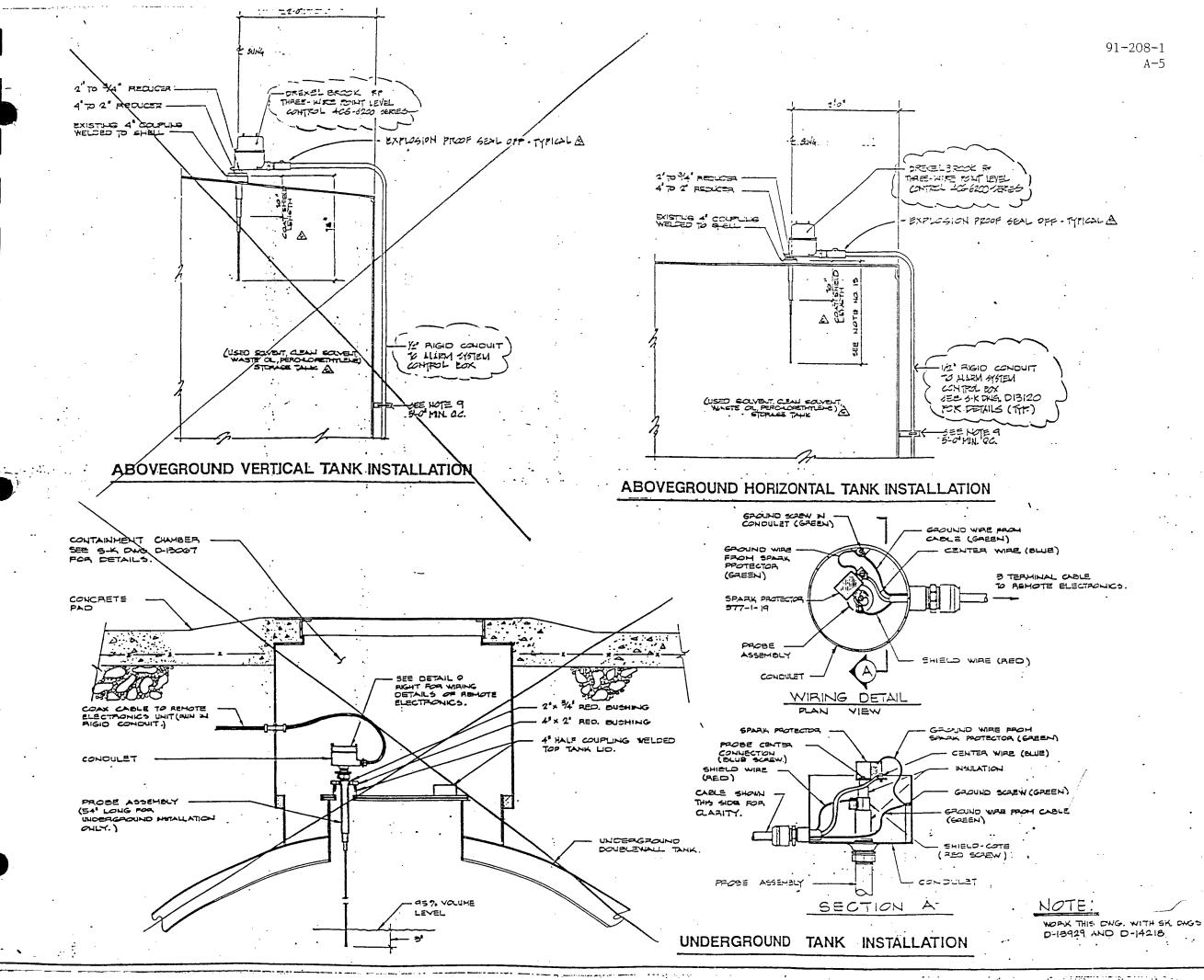
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CENTER BRANCH







91-208-1 A-5

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- SEE INDIVIDUAL SERVICE CENTER SITE PLANS FOR RELATIVE LOCATIONS OF THESE DETAILS.
- CONTRACTOR TO SUPPLY & INSTALL CONDUCT SUPPORTS & BRACKETS AS ACTURAD.
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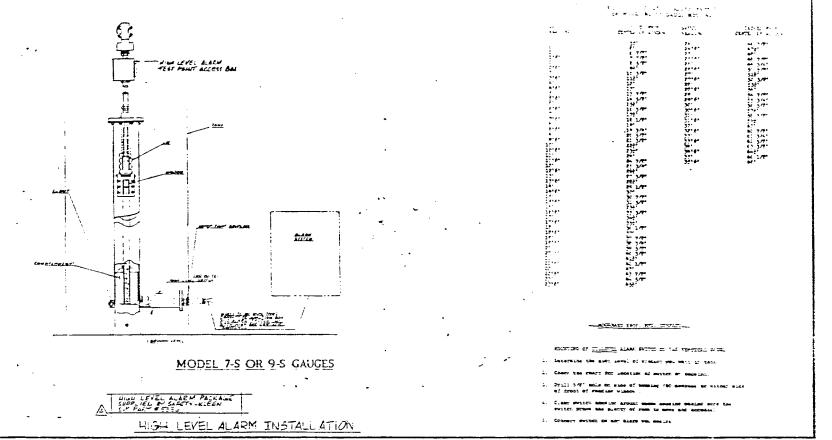
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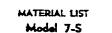
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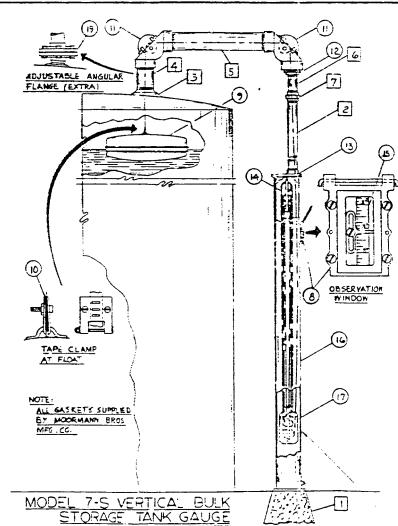
For All Vertical Tanks Up To & Including 25'

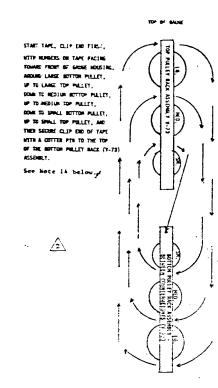
- Acturial Supplied by CONTRACTOR
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- Jank Roof Flange.
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- 7. 1" Game wand Union.

() Material Supplied by Maternant Bros. (SAPETY-KLEEN)

	PART NAME	PART No.	95A
٤.	Observation Window Assembly	A-34-A-3E	
9.	Floet	V-75.	•
10.	Steinless Steel Tape Clamp & Screws	V-93	
11.	Elbow Assembly Complete	A-30, A-33	:
12.	2" to 1" Reducing Busining		
13.	Eccentric Cap Complete with Nuts & Bolts	V-71	
14.	Pulley kack Assembly	V-73	1
15.	Lufkin Seveniess Steel High Visibility Tape	V-49	
16.	Rust-Proofed Steel Gauge Housing	V-77	
17.	Counterweight	V-72	:
18.	Condensation Drain Plug		
	Frame & Lid Assembly for Observation Window	A-34, A-38	
	Gestuts - Set for Observation Window	V-81, V-82	
	Geslat - Ellow Cap	V-83	
	Geslust - V-71 Eccentric Cap	V-84	
	Giass - Window	V-86	
	Staining Seel Indicator Emper		
	for Observation Window	V-94	1
	Wire Pus - Stausless Steel	V-96	:





ENLARGED DETAIL SHOWING HOW TAPE IS WOUND ON PULLEY RACK ASSEMBLIES OF MOORNAMS MODEL \$7-5. CUT OFF EXCESS TAPE AT FLOAT.

INSTALLATION INSTRUCTIONS - MODEL 7.5

- tion on pround -- mark top edge of tank directly above ground tocatio
- ure, cut and thread 2" pipe les mented on print).
- 3. Use give done on all connection
- mble both A-30 elbows and 2" pipe as shown an print.
- v (1) allow A-30 anto 2" pipe with reducing bushing, close repair A-30 elbow onto 2" nipple in tenk then screw other end of 2" pipe into tank elbow straight with tank marking
- i. Level 2" pipe, use temporary wood brace or alignment fiange, if necessary
- 7. Set gauge housing with eccentric cap essembled on ground directly below eventuang t. Measur: for 1" pipe frequency bushing in above to eccentric cap V-76 on gauge hou for threads, cut and thread 1" pipe.
- ow 1" pipe into albow, then remove V-71 ac CAUTION - Be sure eccentric crp is straight and I" outlet is farmest every from tonk
- pulley sack with large pulley up to accentric cap using stainlass steel purs.
- sie other puttey rack in counterweights with large pulley down.
- 12. Place counterweight on ground directly beneath eccentric cap pulley ruck.
- 13. Remove A-33 caps from both eloows.
- 14. Thread type from same above with numbers up and dip ands first through 2° pape and over above pulsevs cown through 1° pipe and out eccentric cap, straight down and around bottom pulsev is C/W and up and over too pulsey in eccentric cap, down to medium pulse and over ano pulsey in eccentric cap, down to medium pulse and over medium pulsey, down and around small pulse on eccentric cap, down and around small pulse on eccentric cap, down and around small pulse. CAUTON-Do act down and fasters to lug on counterweight pulsey rack. Use caution-do not kerk or band tape.
- 15. Fasten tape to filoat with table clamp (as per print) CAUTION Do not fusion taple clamp too tigh as this may damage tark.
- 16. Piece eccentric cap gaster on housing top and insert counterweight assembly interhousing, CAU-TION Do not ellow C/W to drop or terk as this may cause damage to tearings, elso be sure the tape is in groove of pultays and not on the edge.
- 17. Fasten housing to eccentric cap with observation window directly be
- 18 Place outside strand of table over table guide in observation window, CAUTION Do not band a kink tape, and put ONLY CNE [1] strand of tape over the tape guide.
- 19. If tank is emony adult tape reading in 1-3/8" (floet durif) if it is pertailly full set reading exactly with stick, make make table reading r diverments with the floet by Uspong tape through tape clemp. Minor advertments (within 1' make with observation finger).
- 20. In setting the reading on the gauge, N°, N° or ever, 1/8° is not close enough, be perticular, an gauge to the exect emount of inouid in tenk.
- 21. CAUTION Let floet down as tank easily. Do not let it drop.
- 2. Assemble observation famic and Nd A-34-A-38 place on housing, typisen for vepor-proofing 23. Fix base for hissing either, concrete, wood post, or shell plate walcold to tank, CAUTION - Do
- not weld pauge housing to lank.
- 25. In most climates, condensation forms inside the tank and gauge. A drem plug has been provided for draming at the bottom of housing. In most climates this is necessary 2 times a year lupring & fell, however, in extreme cases draming is required more often.

A. C. T. S. M. S. P. E.

91-208-1 A-6

and union as shown or

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FROM OF

GENERAL NOTES

- 1. TANK GAUGE ASSEMBLY SUPPLIED BY SAFETY-KLEEN CORP.
- 2. SEE INDIVIDUAL SERVICE CENTER SITE PLANS FOR LOCATION OF THE INSTALLATION.
- 3. GAUGE HUST BE ORDERED WITH THE PERFORATED TAPE FOR FUTURE REMOTE READ-OUT SYSTEM.
- 4. HIGH/LOF LEVEL ALARM SWITCH INFORMATION, MATERIAL LIST & INSTALLATION INSTRUCTIONS INCORPORATED ONTO DRAWING.
- ▲ 5. IF REQUIRED, ADDITIONAL VERBAL INSTALLATION INSTRUCTIONS CAN BE OBTAINED BY CALLING MOORMAN BROS. MFG. C. J. RUSHVILLE. INDIANA (317) 932-3590 -455 COL. ASK FOP BOB GAINES OR JIM RAVENCRAFT

Æ.	Home Source Avery FAC #3	·	<u>.</u>
	LAUDER ADDITIONAL HINH LEVEL ALAUM INFO.	- R.	
4	ADDED TAPE WINDING INFO ABOVE	Ne.2	1+ 2 5+
	ADDED NOTE S	W-2	1-13-84
REX	DESCRIPTION	81	PATE
C,		()Herg 1" . 9	
	ORMANN BROS. TANK	400	
GA		11	
	Service Center Branch	A 10	243



Sikagard[®]62

High-Build Protective Coating

Technical Data



Description:	Sikagard 62 is a 2-component, solvent-free, high-solids, moisture-insensitive epoxy resin. It produces a high-build, protective, dampproofing, and waterproofing vapor-barrier system. Sikagard 62 conforms to ASTM C-881, Type I and IV, Grade 2, epoxy resin.
Where To Use:	Use as a high-build, corrosion-resistant, protective coating, or as a seamless flooring system on dry and can't-dry substrates.
Advantages:	 Protects dry and can't-dry substrates. Exceptional tensile strength. Good chemical resistance for long-term protection. Convenient B:A = 1:1 mixing ratio. Easy, paint-like viscosity. Durable, smooth finish permits wipe-off graffiti-removal. Available in 3 standard colors; gray, red, and tan. Special color matches available upon request. Excellent bonding to all common structural substrates. Super abrasion resistance for long-term wear. Sikagard 62, Gray, after cure, is approved for contact with potable water. All colors are USDA-approved for use in food plants.
Coverage:	225-400 sq ft/gal (4-7 mils)
Packaging:	4-gal units; 1-qt units, 12/case.

Typical Data for Sika	pard 62:		91-208-1 A-8
	g conditions @ 73F and 50	% R.H.)	
Shelf Life:	2 years in original, uno	ppened containers.	
Storage Conditions:	Store dry at 40-95F. C	condition material to 65-85F before using.	
Color:	Gray, red, tan.		
Mixing Ratio:	Component 'A' : Compo	nent 'B' = 1:1 by volume.	
Viscosity:	Approx 2,700 cps.		
Pot Life:	Approx 35 min.		
Application Life:	20-25 minutes.		
Tack-Free Time:	Approx 4 hr.		
Open Time:	Light foot traffic - 5-7 Rubber-wheel traffic - 8		
Immersion and chemical exposure:	3 days		
Tensile Properties (A 14 day Tensile St Elongatio		6,400 psi 2.7 %	
Abrasion (Taber Abra 7 day Weight lo: (H-22 whe	-	0.61 gm	
Abrasion Resistance 14 day Abrasion ((ASTM D-968): Coefficient	51 liters/mil	
Adhesion (ASTM D-3		· · · · · · · · · · · · · · · · · · ·	
1 day Adhesion C	lassification	4A	
Water Absorption (AS 7 day Total Wate (2-hour bo	r Absorption	0.9%	

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	 Do not apply Material is a 	ostrate temperature for application 50 over wet, glistening surface. vapor barrier after cure. to surfaces where vapor can condens	
	Do not encapDo not apply	sulate saturated concrete in areas of to porous surfaces exhibiting moisture nical Service.	freezing and thawing.
		e of concrete prior to application is 21-	28 days, depending on curing and dryin
	 Do not apply 	to exterior substrate on-gradeepo: e to sunlight.	xy resin coatings will weather and cha
		plications only, thin with Sika Epoxy	Thinner at 5% by volume. Thin only
Caution:	Avoid eye conta		-
	Component 'B'-Co eye contact.	orrosive - Contains amines. Contact w	ith skin may cause severe burns. Avo
	Product is a s recommended.	strong sensitizer. Use of safety g Remove contaminated clothing. Av e of a NIOSH/MSA organic vapor	void breathing vapors. Use adequa
First Aid:	immediately wit	n contact, wash thoroughly with so th plenty of water for at least 15 minu blems, remove person to fresh air.	tes; contact physician immediately. F
Clean Up:	Ventilate area. (Confine spill. Collect with absorbent m	aterial, flush area with water. Dispose
	can be removed	with approved solvent. Cured mate	nd federal regulations. Uncured materi rial can only be removed mechanicall
	KEEP CONTAINE	R TIGHTLY CLOSED NAL CONSUMPTION NSULT MATERIAL SAFETY DATA SHEE	rial can only be removed mechanicall KEEP OUT OF REACH OF CHILDRE FOR INDUSTRIAL USE ONI
DIRECTIONS AND TESTED IN ACC OF MERCHANTABILITY OR FITN CONSEQUENTIAL DAMAGES, RE PARTICULAR PURPOSE OR FROM	S TO BE FREE OF MANUFACTURING CODES FOR A PARTICULAR PURPOSE ESULTING FROM ANY CLAIMED BR M ANY OTHER CAUSE WHATSOEVER	d with approved solvent. Cured mater R TIGHTLY CLOSED NAL CONSUMPTION NSULT MATERIAL SAFETY DATA SHEE ANDARDS. THERE ARE NO OTHER WARRANTIES BY SIKA OF ANY WAT IN CONNECTION WITH THEY WILL MEET SIKA'S CURRENT PUBLISHE EACH OF ANY WARRANTY. WHETHER EXPRESSED OR IMPLIED, IN . SIKA SHALL ALSO NOT BE RESPONSIBLE FOR USE OF THIS PRODU	rial can only be removed mechanicall KEEP OUT OF REACH OF CHILDRE FOR INDUSTRIAL USE ONI T FOR MORE INFORMATION D PHYSICAL PROPERTIES WHEN APPLIED IN ACCORDANCE WITH SIX DE WHATSOEVER, EXPRESSED OR IMPLIED, INCLUDING ANY WARRAN NOT BE LIABLE FOR DAMAGES OF ANY SORT, INCLUDING REWOTE ICLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FO ICT IN A MANNER TO INFRINGE ON ANY PATENT HELD BY OTHERS.
DIRECTIONS AND TESTED IN ACC OF MERCHANTABILITY OR FITN CONSEQUENTIAL DAMAGES, RE PARTICULAR PURPOSE OR FROM Executive Office	S TO BE FREE OF MANUFACTURING CORDANCE WITH ASTM AND SIKA ST ESS FOR A PARTICULAR PURPOSE SULTING FROM ANY CLIAIMED BR M ANY OTHER CAUSE WHATSOEVER 2: P.O. Box 297, Lyndh	with approved solvent. Cured mater R TIGHTLY CLOSED NAL CONSUMPTION NSULT MATERIAL SAFETY DATA SHEE ANDARDS. THERE ARE NO OTHER WARRANTIES BY SIKA OF ANY NAT IN CONNECTION WITH THIS PRODUCT. SIKA CORPORATION SHALL EACH OF ANY WARRANTY. WHETHER EXPRESSED OR IMPLIED. IN . SIKA SHALL ALSO NOT BE RESPONSIBLE FOR USE OF THIS PRODU TAUTST, NJ 07071 - Tei 201-933-8800 - FAX 201-933	rial can only be removed mechanicall KEEP OUT OF REACH OF CHILDRE FOR INDUSTRIAL USE ONI T FOR MORE INFORMATION D PHYSICAL PROPERTIES WHEN APPLIED IN ACCORDANCE WITH SIX DE WHATSOEVER, EXPRESSED OR IMPLIED, INCLUDING ANY WARRAN NOT BE LIABLE FOR DAMAGES OF ANY SORT, INCLUDING REWOTE ICLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FO ICT IN A MANNER TO INFRINGE ON ANY PATENT HELD BY OTHERS.
DIRECTIONS AND TESTED IN ACC OF MERCHANTABILITY OR FITM CONSEQUENTIAL DAMAGES, RE PARTICULAR PURPOSE OR FROM Executive Office Regional* and D AL CA, San Diego CA, Union City CA, CICA CA,	S TO BE FREE OF MANUFACTURING CODES FOR A PARTICULAR PURPOSE ESULTING FROM ANY CLAIMED BR M ANY OTHER CAUSE WHATSOEVER	with approved solvent. Cured mater R TIGHTLY CLOSED NAL CONSUMPTION NSULT MATERIAL SAFETY DATA SHEE ANDARDS. THERE ARE NO OTHER WARRANTIES BY SIKA OF ANY NAT IN CONNECTION WITH THIS PRODUCT. SIKA CORPORATION SHALL EACH OF ANY WARRANTY. WHETHER EXPRESSED OR IMPLIED. IN . SIKA SHALL ALSO NOT BE RESPONSIBLE FOR USE OF THIS PRODU TAUTST, NJ 07071 - Tei 201-933-8800 - FAX 201-933	rial can only be removed mechanicall KEEP OUT OF REACH OF CHILDRE FOR INDUSTRIAL USE ONI T FOR MORE INFORMATION D PHYSICAL PROPERTIES WHEN APPLIED IN ACCORDANCE WITH SIX DE WHATSOEVER, EXPRESSED OR IMPLIED, INCLUDING ANY WARRAN NOT BE LIABLE FOR DAMAGES OF ANY SORT, INCLUDING REWOTE ICLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FO ICT IN A MANNER TO INFRINGE ON ANY PATENT HELD BY OTHERS.
DIRECTIONS AND TESTED IN ACC OF MERCHANTABILITY OR FITM CONSEQUENTIAL DAMAGES, RE PARTICULAR PURPOSE OR FROM Executive Office Regional* and D AL CA, San Diego *CA, Santa Fe Spring: CA, Union City CO, Denver CT, Hartford FL, Ft. Lauderdale *FL, Tampa GA, Atlanta IN, Indianapolis Export Division	S TO BE FREE OF MANUFACTURING CORDANCE WITH ASTM AND SIKA ST ESS FOR A PARTICULAR PURPOSE SULTING FROM ANY CLAIMED BR M ANY OTHER CAUSE WHATSOEVER P.O. Box 297, Lyndh District Sales Office 	A with approved solvent. Cured mater R TIGHTLY CLOSED NAL CONSUMPTION INSULT MATERIAL SAFETY DATA SHEE DEFECTS AND THAT THEY WILL MEET SIKA'S CURRENT PUBLISHE ANDARDS. THERE ARE NO OTHER WARRANTIES BY SIKA OF ANY NAT IN CONNECTION WITH THIS PRODUCT. SIKA CORPORATION SHALL EACH OF ANY WARRANTY. WHETHER EXPRESSED OR IMPLIED. II SIKA SHALL ALSO NOT BE RESPONSIBLE FOR USE OF THIS PRODU THURST, NJ 07071 - Tei 201-933-8800 - FAX 201-93: 25 MA, Boston	rial can only be removed mechanicall KEEP OUT OF REACH OF CHILDRE FOR INDUSTRIAL USE ONI FOR INDUSTRIAL USE ONI T FOR MORE INFORMATION Depression of the accordance with six prewharsoever, expressed or implied, including any warrant not be Liable For Damages of any sort, including any warrant of the Liable For Damages of any sort, including enote iciduoing any warranty of MERCHANTABILITY OR FITNESS FO JOCT IN A MANNER TO INFRINGE ON ANY PATENT HELD BY OTHERS. 3-9379 PA, Carnegie 412-279-1176 PA, King of Prussia Sold ST, Spartanburg 803-573-8867 TN

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Chemical Resistance:

Specimen: Two coats- 10 mils Cured 10 days Substrate: asbestos cement

CUENICAL	TEST	STORAGE TIME AND EVALUATION				
CHEMICAL	TEMP.	1 Day	1 Month	2 Months	6 Months	12 Months
Water	75F 100F 140F	A A A	A A A	A A A	A A A.D	A A A.D
Sodium Chloride Solution (Saturated)	75F 100F	A	A	A	A	A
Sodium Hydroxide 30%	75F	A	A	A	A	A
Cement Water (Saturated)	75F	А	A	А	А	A
Detergent Solution (5% Ajax)	75F 140F	A A	A	A A	A A.D	A A.D
Hydrochloric Acid	75F	A	A	A	А	A
Sulfuric Acid 10%	75F	A	A	A	в	в
Oxalic Acid 10%	75F	A	A.D	A.D	A,D	A.D
Citric Acid 10%	75F	А	A.D	A.D	A.D	A,D
Fuel Oil (Home Heating)	75F	A	A	A	A	A.D
Gasoline (Unleaded)	75F	А	A	A	A	A.D
Iso-Octane	75F	A	A	A	A	A.D
Toluol	75F	A	A	А	A	A.D
Silage	75F	A	A	A,D	A,D	B.D
Synthetic Silage	75F	A	A	B,D	B.D	B.D
Liquid Manure	75F	A	A	A	А	A.D
Ethyl Alcohol	75F	A	С	-	-	_

A: Resistant in permanent contact B: Temporary resistance C: Destroyed D: Discolored

How To Use

Surface Preparation:	Surface must be clean and sound. It may be dry or damp, but free of standing water. Remove dust, laitance, grease, curing compounds, impregnations, waxes, foreign particles, and disintegrated materials. Preparation Work: Concrete - Sandblast or use other approved mechanical means. Steel - Sandblast to white-metal finish.
Mixing:	Pre-mix each component. Proportion equal parts by volume of Component 'A' and Component 'B' into a clean mixing container. Mix with a low-speed (400-600-rpm) drill and Sika paddle for 3 minutes, until uniform in color. Mix only that quantity that can be used within its application life.
Application:	Apply coating using high-quality rollers or brushes, or spray. Two coats are recommended. Apply second coat as soon as the first coat is tack-free and the traffic of application will not damage the first coat. The second coat, however, must be applied within 48 hours since a longer delay will require additional surface preparation. For slip-resistance, add approximately ½ lb/gal of Sikagard 62 Granules to the mixed material and apply as first coat. Saturate roller or brush with material and apply first to a disposable cardboard or other surface to distribute the granules evenly on the equipment. Do not spray with Sikagard 62 Granules in the coating. When spraying, use the following or similar equipment: Binks Model #18 Air Atomized Spray Gun (#68 fluid nozzle, #68 PB air nozzle, #68 fluid needle, #83-5661, 2-gal pressure fluid tank). For Sikagard 62 Flooring System information consult your Technical Data Sheet or call Technical Service.

Sikaflex[®]-1a

Elastomeric sealant/adhesive

Technical Data



Description:	Sikaflex-1a is a premium-grade, high-performance, moisture-cured, 1-component. polyurethane-base, non-sag elastomeric sealant.			
Where to Use:	 Designed for all types of joints where maximum depth of sealant will not exceed ½ in. Excellent for small joints and filletswindows, door frames, reglets, flashing, and many construction adhesive applications. Suitable for vertical and horizontal joints; readily placeable at 40F. Has many applications as an elastic adhesive between materials with dissimilar coefficients of expansion. 			
Advantages:	 Easy, low-cost, ready to use. Eliminates time, effort, and equipment for mixing, filling cartridges, pre-heating or thawing, and cleaning of equipment. High elasticity - cures to a tough, durable, flexible consistency with exceptional cut- and tear-resistance. Excellent adhesion - bonds to most construction materialswithout primer in most cases. Long life. Excellent resistance to aging, weathering. Proven in tough climates around the world. USDA-approved: chemically acceptable to the U.S. Department of Agriculture for use in meat and poultry processing area. Odorless, non-staining Paintable with water-, oil-, and rubber-base paints. Jet fuel resistant. Meets Federal Specification TT-S-00230C, Type II, Class A. Meets ASTM C-920, Type S, Grade NS, Class 25. Meets Canadian Standard 19-GP-16A, Type II. EPA-approved for potable-water contact. Urethane-based, suggested by EPA for radon reduction. 			
Coverage:	10.3-fl-oz cartridge seals 12.4 lineal ft of ½- x ¼-in. joint. 20-fl-oz uni-pac sausage seals 24 lineal ft of ½- x ¼-in. joint.			
Packaging:	Disposable 10.3-fl-oz, moisture-proof composite cartridges, 24/case, and uni-pac sausages, 20-fl-oz, 20/carton; Available on special order 1.8- and 4.5-gal pails, 50-gal drums, and 10.3-fl-oz uni-pac sausages.			

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Typical Technical Data Sikaflex-1a: (Material and curing conditions 73F and 50% R.H.)

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Colors:	White, colonial white, aluminum gray, limestone, black, dark bronze, capitol tan. Spec architectural colors on request.
	z cartridges 12 months
10.3- an	d 20-fl-oz uni-pac sausages 12 months
1.8-gal	
4.5-gal	pails 4 months
50-gal dru	ims 4 months
Storage Conditions:	Store at 40-95F. Condition material to 65-85F before using.
Application	
Temperature:	40 to 100F. Sealant should be installed when joint is at mid-range of its anticipated movemen
Service Range:	-40 to 167F
Curing Rate:	Tack-free Time 6 to 8 hours (TT-S-00230C)
-	Tack-free to touch 3 hours
	Final cure 5 to 8 days
Recovery	>90%
Shore A Hardness (AS'	
21 day	40± 5
Tensile Properties (AS	TM D-412):
21 day	Tensile Stress 140 psi
,	Elongation at Break 700%
	Modulus of Elasticity 25% 40 psi
	50% 60 psi
	100% 80 psi
Lao-Shear Strength (A)	STM D-1002), modified, glass substrate
21 day	50F 120 psi
,	73F 125 psi
	122F 125 psi
Adhesion in Peel (TT-S	-00230C):
Substrate	Peel Štrength Adhesion Loss
Aluminum	25 lb 10%
Glass	20 lb 5%
Concrete	20 lb 0%
Weathering	
Resistance:	Excellent
Ozone Resistance:	Exceptional
Chemical Resistance:	Good resistance to water, diluted acids, and diluted alkalines. Consult Technical Service for specific data.
Radon Reduction:	Approximately 97% reduction in radon. Independent laboratory evaluation. Actual resul available upon request, consult Technical Service.

. .			91-208-1
Caution: FHSLA Toxicity Test (16 CFR 1500) Primary skin irritant Eye irritant Acute oral toxicity Acute inhalation Acute dermal toxicity	y	FHSLA Toxicity Category Skin irritant Eye irritant Non-toxic orally Not toxic by inhalati Not toxic dermally	A-13
Combustible:	Keep away from open flames and high adequate ventilation.	heat. Contains xylene	; avoid breathing vapors. Use with
Irritant:	Avoid skin and eye contact. Use of goggles, and chemical-resistant glov shoes.	NIOSH/MSA approve es recommended. Ren	d organic vapor respirator, safety nove contaminated clothing and
First Aid:	In case of skin contact, wash tho immediately with plenty of water for before re-use. Discard contaminate	at least 15 minutes;	
Clean Up:	Uncured material can be removed wit mechanically. For spillage, collect, a local, state, and federal regulation	bsorb, and dispose of	
	KEEP CONTAINER TIGHTLY CLOSED		KEEP OUT OF REACH OF CHILDREN
	NOT FOR INTERNAL CONSUMPTION		FOR INDUSTRIAL USE ONLY
	CONSULT MATERIAL SAN	ETY DATA SHEET FOR	MORE INFORMATION
DIRECTIONS AND TESTED IN ACCORDA OF MERCHANTABILITY OR FITNESS FI CONSEQUENTIAL DAMAGES, RESULT	BE FREE OF MANUFACTURING DEFECTS AND THAT THEY WILL MEET INCE WITH ASTM AND SIKA STANDARDS. THERE ARE NO OTHER WARF OR A PARTICULAR PURPOSE IN CONNECTION WITH THIS PRODUCT ING FROM ANY CLAIMED BREACH OF ANY WARRANTY, WHETHER OTHER CAUSE WHATSOEVER. SIKA SHALL ALSO NOT BE RESPONSI	ANTIES BY SIKA OF ANY NATURE WHATS SIKA CORPORATION SHALL NOT BE L EXPRESSED OR IMPLIED, INCLUDING	SOEVER, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY IABLE FOR DAMAGES OF ANY SORT, INCLUDING REMOTE OR ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A
Executive Office:	P.O. Box 297, Lyndhurst, NJ 07071 - Tel 201-93	3-8800 - FAX 201-933-9379	
Regional* and Dist			X X X
CA, San Diego *CA, Santa Fe Springs CA, Union City CO, Denver CT, Hartford FL, N. Miami Beach *FL, Tampa GA, Atlanta IL, St. Charles IN, Indianapolis MA, Boston		313-354-6555 PA, 612-427-1652 SC, 816-921-1022 TX, 314-231-5499 TX, 201-933-8800 TX, 518-452-7453 VA, 803-581-0223 VT, 216-749-7225 WA	Carnegie

Export Division

Drawer 297.

March, 1990



How To Use

Surface Preparation:	Clean all surfaces. Joint walls must be sound, clean, dry, frost-free, and free of oil and grease Curing compound residues and any other foreign matter must be thoroughly removed. Instal bond breaker tape or backer rod to prevent bond at base of joint.
Priming:	Priming is not usually necessary. Most substrates only require priming if testing indicates a need or where sealant will be subjected to water submersion after cure. Consult Sikaflex Primer Technical Data Sheet or Technical Service for additional information on priming.
Application:	Recommended application temperatures: 40-100F. For cold weather application, store units a approximately 70F; remove just prior to using. For best performance, Sikaflex-1a should be gunned into joint when joint slot is at mid-point of its designed expansion and contraction. Place nozzle of gun into bottom of the joint and fill entire joint. Keep the nozzle in the sealant continue on with a steady flow of sealant preceding the nozzle to avoid air entrapment. Avoid overlapping of sealant to eliminate entrapment of air. Tool as required. For use in horizontal joints in traffic areas, the absolute minimum depth of the sealant is ½ in and closed cell backer rod is recommended over open cell to offer greater support.
Limitations:	 Allow 1-week cure at standard conditions when using Sikaflex-1a in total water immersion situations. Avoid exposure to high levels of chlorine. Maximum depth of sealant must not exceed ½ in.; minimum depth is ¼ in. Maximum expansion and contraction should not exceed 25% of average joint width. Do not cure in the presence of curing silicone sealants. Avoid contact with alcohol, and other solvent cleaners, during cure. Do not apply when moisture-vapor-transmission condition exists, from the substrate, as this can cause bubbling within the sealant. Use opened cartridges and uni-pac sausages the same day. When applying sealant, avoid air-entrapment. Since system is moisture-cured, permit sufficient exposure to air. White color tends to yellow slightly when exposed to ultra-violet rays. The ultimate performance of Sikaflex-1a depends on good joint design and prope application with joint surfaces properly prepared. Minimum depth of sealant in horizontal joints subject to traffic is ½ in.

APPENDIX B Design Review Documentation

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<u>APPENDIX B</u>

Design Review Documentation

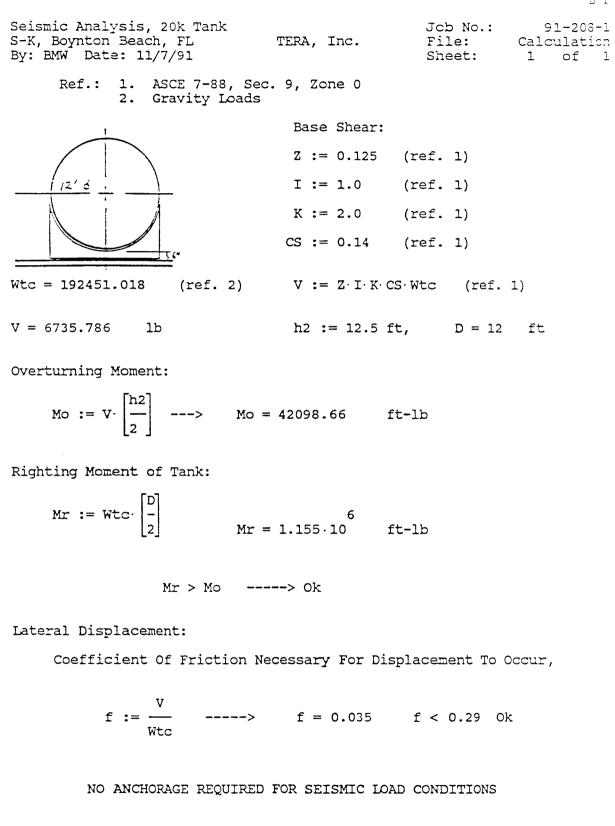
TABLE OF CONTENTS

<u>Title</u>

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Tank Seismic Response Calculation - 20K Tank	B- 1
Gravity Load Calculation - 20K Tank	B- 2
Containment Wall Strength	B- 6
Containment Volume Calculation	B- 7
Venting Calculation - 20K Tank	B- 8
Piping System Review (Used Antifreeze)	B- 9
NFPA 30 - Piping, Valves and Fittings Compliance Checklist	B-10

<u>Page No.</u>

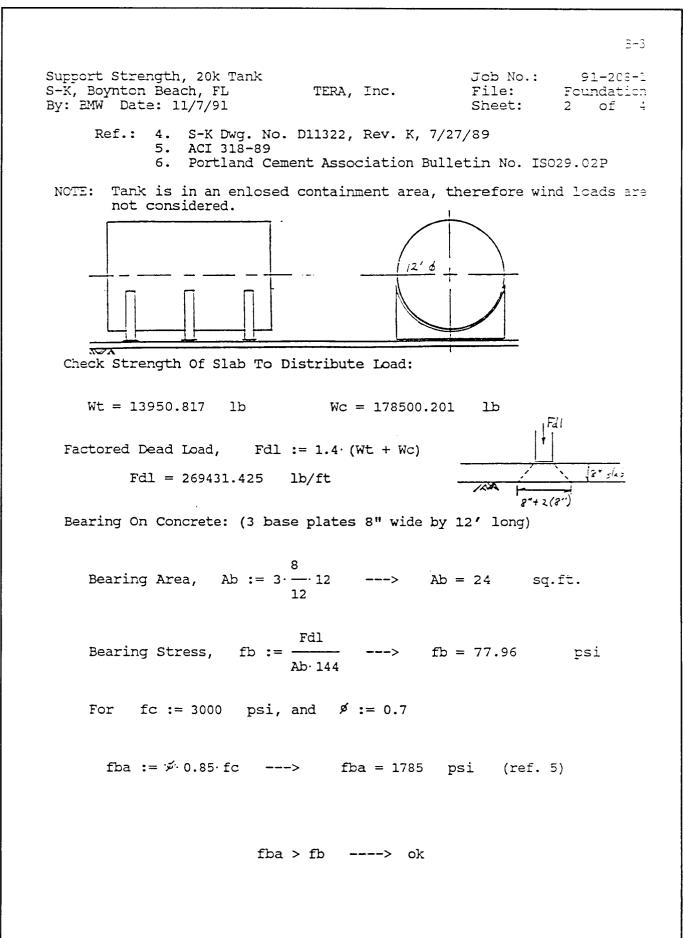


- TERA, INC. ----

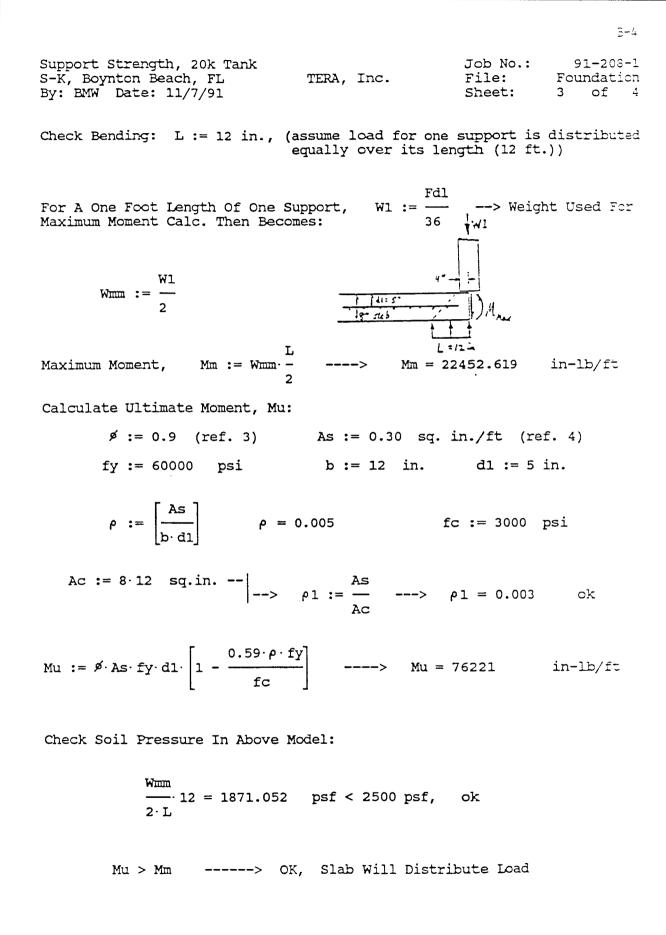
3-1

Gravity Loads, 20k Tank Job No.: 91-208-1 S-K, Boynton Beach, FL TERA, Inc. Foundation File: By: BMW Date: 11/6/91 Sheet: 1 of 4 Ref.: 1. S-K Dwg. No. D10570, Rev. 7, 9/12/83 2. Tank Farm, Fig. II.C.2-1A, Branch Permit Documentation 3. UL 142, Sections 5-8 Tank Self-Weight: D := 12 ft, t1 := 0.250 in, h1 := 4.0 ft w := 490 pcf, L := 24 ft π 2 tl Head Weight, Wh := $-D \cdot - w \cdot 2 - - - > Wh = 2309.071$ lb (ref. 3) 12 4 t1 Shell Weight, Ws := $\pi \cdot D \cdot L \cdot \cdots \cdot w$ ---> Ws = 9236.282 lb (ref. 3) 12 Weight of Saddles, (3 ea.): 8 0.5 Base Plates, Bp := $- \cdot 12 \cdot - \cdot 3 \cdot w$ ---> Bp = 490 lb 12 12 **t1** Saddle Plates, Sp := 1.15.8. ---> Sp = 483.875 lb 12 8 t1 sp := --- h1 - --- 6 w ----> sp = 163.333Side Plates, lb 12 12 W := Wh + Ws + Bp + Sp + sp ----> W = 12682.561lb Misc. Fittings & Apprtnces @ 10%, Ms := 0.1 W Ms = 1268.256 lb Tot. Tank Weight, Wt := W + Ms ---> Wt = 13950.817 lb Weight Of Contents: SG := 1.07 $\Gamma := 62.4$ pcf V := 20000 gal., V := 7.481 gal/cu.ft. v $Wc := - \cdot \Gamma \cdot SG$ -----> Wc = 178500.201 lb Total Weight, Tank And Contents, Wtc := Wt + Wc Wtc = 192451.018 lb

B-2



- TERA, INC. --



- TERA, INC. ---

Support Strength, 20k Tank Job No.: 91-208-1 S-K, Boynton Beach, FL TERA, Inc. File: Foundation By: BMW Date: 11/8/91 Sheet: 4 of 4 Check Subgrade Bearing: Calculate Total Weight Resting On Soil: Wtanks := 438314 lb (weight of other tanks & contents) Wvault := 211738 lb (weight of containment vault) Wt = 13950.8171b (weight of waste E.G. tank) Wc = 178500.201lb (weight of waste E.G.) Wb := 240425lb (estimated weight of the building) Ag := 72.333·31.417 (gross outside area of vault) Aq = 2272.486sq.ft.

Studies Conducted (See Ref. 6) Indicate That The Loads Listed Above Will Be Spread Over The Full Area Of The Containment Vault With Only Minor, Localized Bending In The Containment Slab. Based On This, Approximate Subgrade Bearing Is Taken To Be:

 $Fac := \frac{Wtanks + Wvault + Wt + Wc + Wb}{Ag}$

According To Ref. 4, The Allowable Subgrade Bearing Pressure,

Fal := 2500 psf

Fal > Fac -----> ok

Containment Wall Strength Job No.: 91-208-1 S-K, Boynton Beach, FL TERA, Inc. File: Calculation By: BMW Date: 11/8/91 Sheet: 1 of 1 Containment Inspection Record, This Report
 ACI 318-89 Ref.: 2-SG := 1.07 Γ := 62.4 pcf = 5 Bars 8 6° O.C. Horiz. = 4 3 ars 012° C.C. Yert. h := 3.417ft (ref. 1) 3' S 'E $P := \begin{bmatrix} 0.5 \cdot SG \cdot h \end{bmatrix} \cdot \Gamma$ Applications: Fransure Gradient (RC) - 4 P = 389.788 lb/ft, unfactored 1/2=13.67" $Pf := 1.4 \cdot P$ (ref. 2) 111.44.41 Pf = 545.703 lb/ft, factored \emptyset := 0.9 (ref. 2) As := 0.2 sq.in. Ac := $8 \cdot 12$ sq.in. fy := 60000 psi b := 12 in. As p1 := --d2 := 4 in. fc := 3000 psi AC As $\rho = 0.004$ ሶ := ---> p1 = 0.002ok b·d2 Mu := $\cancel{p} \cdot As \cdot fy \cdot d2 \cdot \left[1 - \frac{0.59 \cdot \cancel{p} \cdot fy}{2}\right]$ Mu = 41076 in-lb/ft ---> 12 · h Mh := Pf - -----> Mh = 7458.669in-lb/ft 3 Mu > Mh----> 0k Mu Safety Factor, SF := --SF = 5.507--> Mh

These Calculations Are Made Even More Conservative By The Assumption That The Containment Area Is Full Of Ethylene Glycol, Not Water.

à−6

– TERA, INC. –

Containment Volume, 20k Tank Job No.: 91-208-1 S-K, Boynton Beach, FL By: BMW Date: 11/8/91 TERA, Inc. File: Calculation Sheet: of 1 1 Ref.: 1. Containment Inspection Record, This Report L := 72.333ft. W := 31.417 ft by to Intreat Total Area, $A := L \cdot W$ ALW silvent 0 A = 2272.486sq.ft. Jagte E.G. 2 Average Wall Height, H := 3.167 ft 4 STE Gross Volume, $V := A \cdot H$ 0:1 V = 7196.963 cu.ft. 31-5" 20000 Tank Volume To Be Subtracted, $Tv := \cdot$ 7.481 Tv = 2673.439cu.ft. Volume Of Misc. Equipment, @ 1% Of Gross Volume, To Be Subtracted, Mv := 0.01·V ----> Mv = 71.97cu.ft. Displacement Of Three Horizontal Tanks, Dia. = 12 ft; Two Of 24 ft, One Of 18 ft In Length, To Be Subtracted, R := 72 in i := 32 in d := R - i ---> d = 40in 2 R · acos -Vdis := -144 Vdis1 := Vdis 2.24 Vdis2 := Vdis 18 Vdis1 = 898.27 cu.ft. Vdis2 = 336.851 cu.ft. D1 := Vdis1 + Vdis2 Displacement Of 2" Raised Pad, Vp := 65.0.25.417.0.1667 Vp = 275.406cu.ft. Net Volume Remaining, Vn := V - Tv - Mv - D1 - VpVn = 2941.026 cu.ft. (conservative estimate) CONTAINMENT VOLUME IS SUFFICIENT

3-7

20	DT:
	Ref: 1. Safety-Kleen TANK DRAwing No. D12966 2. Morrison Bros. Co., 1989 Ed. Venting Guide Face Aboveground Storage TANKS 3. UL 142 - 6th Ed., Sept. 14, 1987, Standard For Steel Above ground TANKS For Flammable And Combustible Liquids. TANK CAPACITY : 20,000 Gallons TANK Size ; 12'\$ x 24'L Wetted Area = 848 ft - Table B-1 Ref - 2 Venting Capacity = 476, 880 St ³ /AR Table 10-1 Ref - 2 Normal Vent min 2.5" Table 10-2 Ref - 3
	Vent Combination - $Re5 - 2$ (or Approved Equivalent) 3" Fig 548 - 802P - 38,800 8" Fig 244 - 1602P - 465,000 503,800 ft^3/hr
	Loose Bolt Manway used As the emergency vent must be 16 "& Min. And the cover must be able to be lifted 1.5" Min Sec 10.6, Fage 12 Ref-3 The combination of the 3" Normal Vent And Loose Bolt 24" Manway meets the above Requirements Since the Used Antifreeze liquid is not flammable or combustible, the listed emergency vent Requirements do not Apply

6

Form TRA-1.02 (8/83)

USED ANTIFREEZE PIPING SYSTEM REVIEW

Safety-Kleen used antifreeze may be a hazardous waste (under characteristic leaching procedure standards) but it is not a flammable or combustible liquid as defined by NFPA 30 "Flammable and Combustible Liquids Code". Although not by definition required, NFPA 30 is an appropriate guideline or standard for the design of piping systems which handle hazardous liquids.

NFPA 30 generally requires that pipe, valves, fittings, and other material, pressure, pressure-containing components meet the and temperature limitations of ANSI B31.3 "Chemical Plant and Petroleum Refinery Piping" or ANSI B31.4 "Liquid Petroleum Transportation Piping Systems". This system operates outdoors under ambient temperature This falls within the ANSI materials specification range of conditions. -20 to 200°F. The normal operating pressure for the system piping will be the pressure required to overcome friction and lift the liquid to the top of the tanks. The system piping components will therefore normally operate at less than 30 psi. If the system pump was turned on in a blocked condition (i.e., with all discharge valves closed) the system components between the pump and the discharge valves would experience a pressure limited by the pump discharge relief valve. Pumps used for loading or unloading these tanks must have a relief valve set for no more than 200 psi.

Components rated for ANSI 125 or 150 lb (or better) class service should be suitable for use in this service. The normal system operating pressure is well within the allowable pressure-temperature ratings for both those classes. The 200 psi to which some components might occasionally be exposed is also within the allowable ambient temperature pressure range for ANSI 150 lb. class and is less than the allowable hydrostatic test pressure for ANSI 125 lb. class components.

In summary, compliance with the items on the "TERA Piping, Valve, and Fitting NFPA 30 Checklist" indicates compliance with the requirements of the NFPA 30 system piping.

91-208-1 B-10

PIPING, VALVES, AND FITTINGS

NFPA 30-1990 Compliance Checklist

for Safety-Kleen Corp. Aboveground Tank Systems

Branch Location: Boynton Beach, Florida Review By: TFTDate: 10/31/91

- <u>N/A</u> 1. Pumps to be ITT Marlow 20EVP-A, 30 EV-A, or 1-1/2 HR49EC series pumps.
- YES 2. Steel piping meets ASTM A53, A106, A120, or A135 specifications.
- YES 3. Wall thickness of threaded pipe meets ANSI B16.10 specifications for Schedule 80 for sizes 1-1/2" and smaller and Schedule 40 for sizes 2" and larger. Wall thickness of welded pipe of all sizes meets Schedule 40 requirements as a minimum.
- N/A 4. Dumpster hose assembly to be S-K Part No. 5237 (per Safety-Kleen drawing D10452).
- YES 5. Valves Morrison Brothers (S-K standard items) or meet ANSI 125 or 150 lb. class requirements.
- YES 6. Flanges and fittings meet ANSI B16 125 lb. (for cast iron and non-ferrous materials) or 150 lb. class (for steel and malleable iron) requirements.
- YES 7. Valves and piping components of low melting point or non-ductile materials (i.e., brass, bronze, aluminum, plastic, rubber, and cast iron) located within containment areas meeting 40 CFR 264.193 requirements.
- YES 8. Tank connections below the liquid level through which liquid can normally flow provided with an internal emergency shut-off valve (with fusible link) and a manual valve close to the tank.
- YES 9. Tank connections below the liquid level through which liquid does not normally flow provided with a liquid-tight plug or blind.
- <u>N/A</u> 10. Used solvent tank fill line drop-tube provided with vacuum breaker in line external to tank and/or hole in top of drop-tube inside of tank to prevent siphoning of liquid from tank.

91-208-1 B-11

PIPING, VALVES, AND FITTINGS

NFPA 30-1990 Compliance Checklist

for Safety-Kleen Corp. Aboveground Tank Systems

(Continued)

Branch Location: Boynton Beach, Florida Review By: TFT Date: 10/31/91

Tank fill and emptying connections (i.e., tank truck connections) are:

SEE

NOTE

- <u>1</u> 11. outside of buildings in a location free of ignition sources;
- YES 12. not less than five feet from any building opening;
- YES 13. furnished with provisions for liquid-tight closure when not in use (i.e., valve and hose connection cap);
- YES 14. properly identified (i.e., marked clean and used);
- YES 15. provided with check valves. (Not required for Antifreeze)
- YES 16. Prior to being placed in service all piping will be hydrostatically tested at 115 psig or pneumatically tested at 85 psig for a minimum of 20 minutes. Pneumatic tests shall include a preliminary check at not more than 25 psig. All piping joints and components shall be examined for leakage during the test.
- YES 17. Exceptions to the above items corrected to comply with NFPA 30 and/or ANSI B31.3 specifications.

Safety-Kleen piping, valves and fittings in compliance with this checklist will meet the requirements of NFPA 30 - 1990, as well as Article 79 of the Uniform Fire Code, 1991 Edition. These components should be checked with other local fire code requirements, which may be more stringent. It should be noted that the used antifreeze liquid in this system is not flammable or combustible.

NOTE 1: Entire system is in a building which is separated from other facility operations and meets all location requirements.

APPENDIX C Description of Waste

6

APPENDIX C

Description of Waste

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Composition of Waste	•		•	•	•		•	•	•		•	•	•	•		•		•		•	C - 2
Compatibility Letter from	Sa	fe	ety	7 - k	<1e	eer	1	•	•	•	•	•		•				•		•	C-3

91-208-1 C-1

CHARACTERISTICS OF WASTE

The used antifreeze is collected from customers in 3,500-gallon tanker trucks and transferred from the tanker truck to the used antifreeze tank in the tank farm of the center. Periodically, trucks are dispatched from recycling centers to evacuate the tank.

Used antifreeze is considered to be toxic according to characteristic leaching procedure standards (D004-D011, D018, D019, D021-D030 and D032-D043). A typical composition, and chemical physical analysis is attached.

A letter from Safety-Kleen addressing compatibility of used antifreeze with system components is attached.

Antifreeze Wastes

	Parametor Nog. Limit	pH <2 or >10	SG na	FP < 100	∧s 5	Da 100	Cd 1	Čr 5	Pb 5	11g 0.2	So 1	Ag 5
LAU	SITE											
W	nu	7.5	1.04	> 200	< 0.05	< 0.3	< 0.05	< 0.05	0.3	< 0.01	< 0.05	< 0.05
W	<i>l:1.</i>	8	1.13	> 200	< 0.05	0.3	< 0.05	< 0.05	< 0.1	< 0.01	< 0.05	< 0.05
W	WL	8.5	1.05	> 200	< 0.05	< 0.3	< 0.05	< 0.05	0.2	< 0.01	< 0.05	< 0.05

Physical Proportios and TCLP Metals Analysis, ppm

TCLP Semi Volatiles Analysis, ppm

	Paramotor	crosot -	2.4-DNT	ClG-bonz C	216-13-but	Cl6-oth	nltrobonz	Cl5-phonol	pyiklino	2.4.5-1CP	2.4.6-1CP	
	Neg. Limit	200	0.13	0,13	0.5	3	2	100	5	400	2	
LAUS	SILLE						•					
W	BU	< 0.04	< 0.04	< 0.04	< 0.04	< 0.04	< 0.04	< 0.2	< 0.2	< 0.04	< 0.04	
W	EL	0.2	< 0.07	< 0.07	< 0.07	< 0.07	< 0.07	< 0.35	< 0.35	< 0.07	< 0.07	
١V	WL.	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.25	< 0.25	< 0.05	< 0.05	

TCLP Volatilos Analysis, ppm

	Paramotor <i>Nog. Limit</i>	tionzona 0.5	CC14 0.5	Clbonz 100	CI ICI3 6	1.4-DCIU 7.5	1.2-DCA 0.5	1.1-DCE 0.7	MEK 200	PCE 0.7	ТСЕ 0.5	VChlorida 0.2
IAU	SHE											
iv	10	< 0.10	< 0.10	< 0.10	< 0.10	< 0,10	< 0,10	< 0,10	< 2,0	0.13	0.97	< 0.20
W	1.1,	0.32	< 0.10	< 0.10	< 0.10	< 0,10	< 0.10	< 0,10	< 2.0	0.12	< 0.10	< 0.20
W	WL.	< 0.10	< 0,10	< 0.10	< 0.10	< 0.10	· < 0.10	< 0.10	< 2.0	0.51	< 0.10	< 0.10

91-208-1 C-2

SAFETY-KLEEN CORPORATION

FAX TRANSMITTAL SHEET

DATE: April 4, 1991

. ...

FROM: PAUL DITTMAR SAFETY-KLEEN CORP. TECHNICAL CENTER P.O. BOX 92050 ELK GROVE VILLAGE, IL 60009-2050 PHONE: (312)694-2700 FAX: (312)694-2733

TO: BOB SPEAK

LOCATION: TERA CORP.

FAX NO.: (713)981-7713

NUMBER OF PAGES, INCLUDING TRANSMITTAL SHEET: 1

SUBJECT: MATERIAL OF CONSTRUCTION FOR WASTE OIL AND SPENT ANTIFREEZE

According to Breslube's Vice President of Engineering, Glenn Casbourne. carbon steel is used now for waste oil tanks. For the record, he confirms that carbon steel is the material of choice for both waste oil and spent antifreeze.

Regards,

Paul Dittmar, Manager of Process and Product Development

cc: Glenn Casbourne

file: MC91047

91-208-1

APPENDIX D Inspection Records

6

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91-208-1

APPENDIX D

Inspection Records

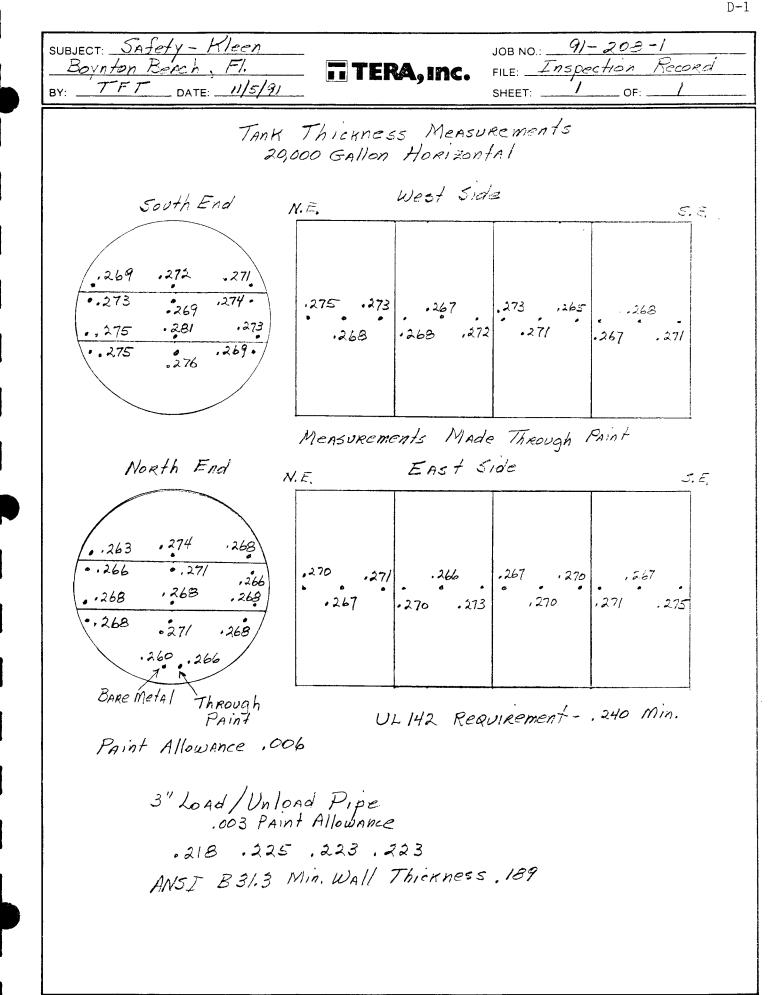
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Photographs	D-7



TERA, Inc.

NEW TANK INSPECTION RECORD

			Sheet: 1 of 1
CLIENT:	Safety-Kleen Corp.		Job No.: 91-208-1
PLANT LOCATI	ON: Boynton Beach, Florid	a	Date: 10/31/91
TYPE INSPECT	ION: Interior/Exterior		By: TFT
ITEM NO.:	CODE: UL 142		YEAR BUILT: 1990
SERVICE:	Used Antifreeze Storage		
CAPACITY:	20,000 gal TANK/DRUM T	YPE: Horizonta	l integral saddles
DIAMETER:	12 feet LENGTH:	24 feet	

	END HEAD		SHELL	FLOOR	<u>JACKET</u>
MATERIALS:	Mild Steel		Mild Steel	N/A	N/A
SHELL CONDITION:			Satisfactory		
END HEAD CONDITIO	N:		Satisfactory		
FLOOR CONDITION:			N/A		
JACKET CONDITION:			N/A		
SUPPORT TYPE:			Three (3) integ	gral saddles	
FOUNDATION TYPE/C	ONDITION:		Reinforced cond	erete/satisfac	tory
INTERNAL STRUCTUR	E CONDITION:		Satisfactory		
WELDED/FLANGED JO	INT CONDITION:		Satisfactory		
NOZZLE CONDITION:			3" normal vent	- satisfactor	У
LINING/COATING CO	NDITION:		Exterior paint	- satisfactor	y
INSULATION CONDIT	ION:		N/A		
SIGNS OF CRACKS:			None		
SIGNS OF PUNCTURE	S:		None		
SIGNS OF COATING	DAMAGE:		None		
SIGNS OF CRACKS O	R MATERIAL DAMA	GE:	None		
SIGNS OF CORROSIO	N :		None		
SIGNS OF OTHER ST	RUCTURAL DAMAGE	OR	PROBLEMS: Nor	ne	
TIGHTNESS TEST?	No TY	PE:			RESULTS :
OPERATING CONDITI	ONS: MAX TEMP:	Ar	mb. MAX PRES	S: Amb VAC:	N/A
REFERENCE INSPECT	te	sti	entation on tan ng from Donegan' Appendix.		

COMMENTS: This tank system was originally installed as a used oil system. The use was changed to used antifreeze before the system was put into service. The system is still not in service until certification is received. The tank is new and has been installed with no internal or external damage visible by inspection.

_ TERA, INC. __

D-2

TERA, Inc.

NEW CONTAINMENT INSPECTION RECORD

		Sheet: 1 of 1
CLIENT: Safety-Klee	en Corp.	Job No.: 91-208-1
PLANT LOCATION: Boynton Bea	ach, Florida	Date: 11/1/91
TYPE: Vaula	t	By: TFT
LEAK DETECTION TYPE: Visua	al	YEAR BUILT: 1990
SERVICE: Used Antifreeze	Storage	
CAPACITY: 50,000 gal.	LARGEST TANK CAPACI	TY: 20,000 gallon
ROOF	/TOP HD. WALL/SHELL	FLOOR
CONSTRUCTION MATLS: Mason	nry Building RC	RC
INTERIOR COATING/LINING OF CO	ONTAINMENT: Sikagard-62	
EXTERIOR COATING/LINING OF PR	RIMARY CONTAINMENT: Paint	
JOINT TREATMENTS:	Sikaflex-1A	
ROOF/TOP HEAD CONDITION:	Satisfactory	
WALL/SHELL CONDITION:	Satisfactory	
FLOOR CONDITION:	Satisfactory	
SUPPORT TYPE:	Slab on grade	
FOUNDATION CONDITION:	Satisfactory	
INTERNAL STRUCTURE CONDITION	: Satisfactory	
JOINT CONDITION:	Satisfactory	
LINING/COATING CONDITION:	Small areas of flaking	coating
LIQUID REMOVAL METHOD:	Sump - hand pump or tru	ick pump
SIGNS OF CRACKS:	None	
SIGNS OF PUNCTURES:	None	
SIGNS OF COATING DAMAGE:	Small areas of flaking	coating
SIGNS OF CRACKS OR MATERIAL	DAMAGE: None	
SIGNS OF CORROSION:	None	
SIGNS OF OTHER STRUCTURAL DA	MAGE OR PROBLEMS: None	
OPERATING CONDITIONS: MAX	TEMP: Amb. MAX PRESS:	Atm. VAC: No
REFERENCE INSPECTION RECORDS	: None	
COMMENTS: This is a new fac	ility with the tank farm	being the foundation
of its own mason	ry building. Only minor	coating touch-up is
required on a few	w areas of the base where	coating has lifted.

– TERA, INC. –

6

D-3

1999

P02

Donegan's Plumbing Service, Inc.

1845 S.W. FOURTH AVENUE, A-12 • DELRAY BEACH, FLORIDA 33444 • (407) 276-1942

TOM TROLLER TO: TERA COMPANY

FROM: DAN DONEGAN

DATE: NOVEMBER 14. 1991

SAFETY KLEEN SERVICE CENTER TANKACE RE: QUANTUM PARK - 5610 ALPHA DRIVE; BOYNTON BEACH, FL NO SEO FREEZE Wow .

PER OUR PHONE CONVERSATION OF NOVEMBER 13, 1991:

DONEGAN'S PLUMBING PRESSURE TESTED TANK NUMBER TWO (USED OIL) WITH THREE TO FIVE POUNDS AIR PRESSURE ON SEPTEMBER 10, 1990. THIS WAS INSPECTED AND APPROVED BY THE CITY OF BOYNTON BEACH ON SEPTEMBER 11, 1990.

SHORTLY THEREAFTER, PIPING FOR TANK FARM WAS AIR TESTED AND APPROVED.

I AM SENDING A COPY OF BOYNTON BEACH PERMIT WITH OUR NOTATIONS OF INSPECTIONS CALLED AND COMPUTER READ-OUT OF BOYNTON BEACH INSPECTIONS AND APPROVALS.

THIS INFORMATION WILL BE FAXED AND HARD COPIES WILL FOLLOW IN MAIL.

PLEASE DO NOT HESITATE TO CONTACT ME IF I CAN BE OF FURTHER SERVICE.

DANIEL M. DONEGAN

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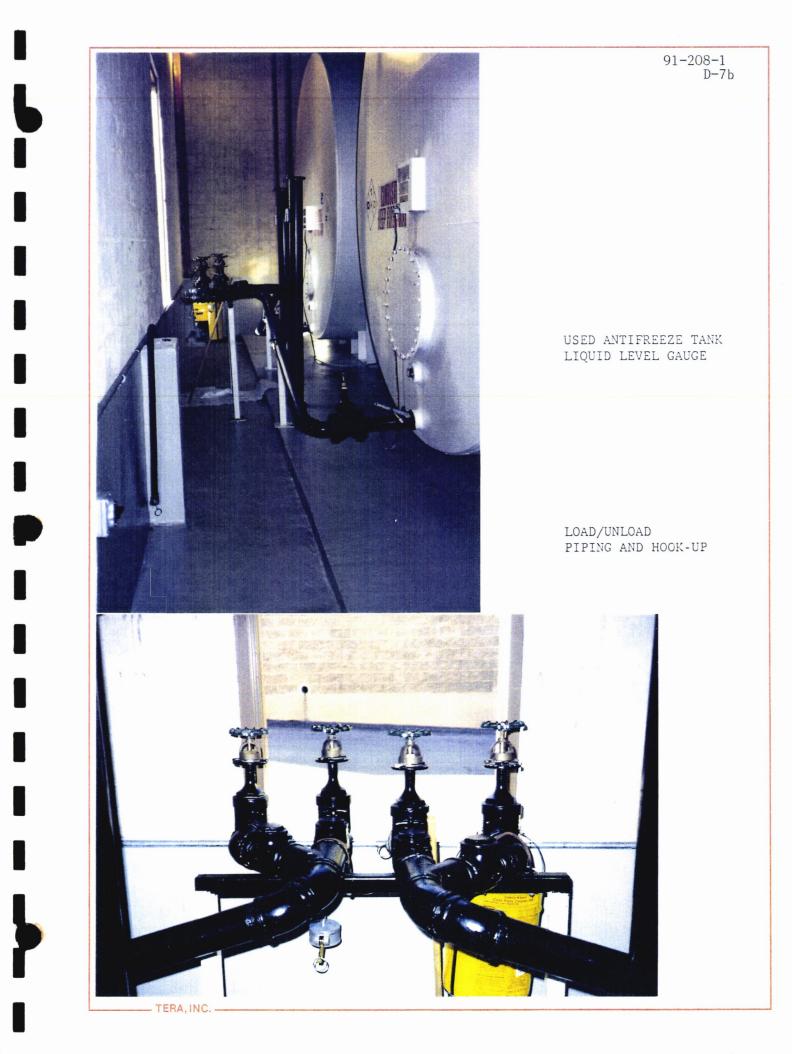


TANK FARM BUILDING

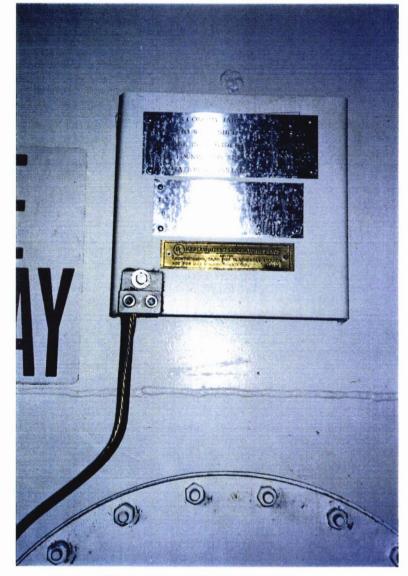


TRUCK PAD

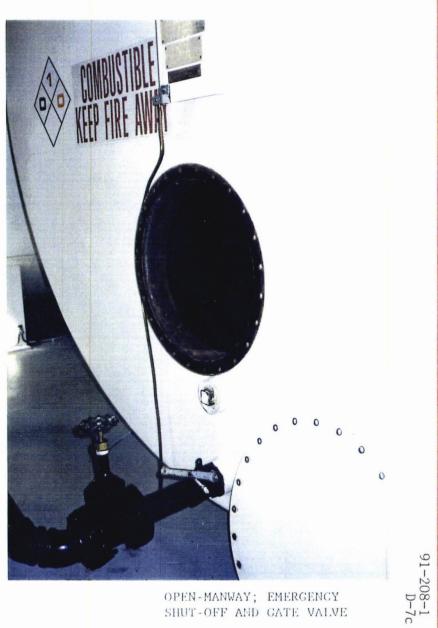
BOYNTON BEACH BRANCH FACILITY



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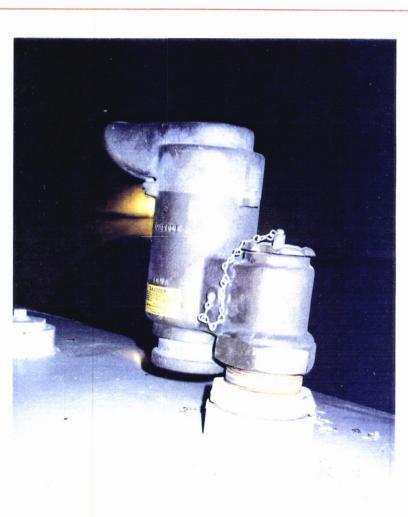


USED ANTIFREEZE TANK NAMEPLATE



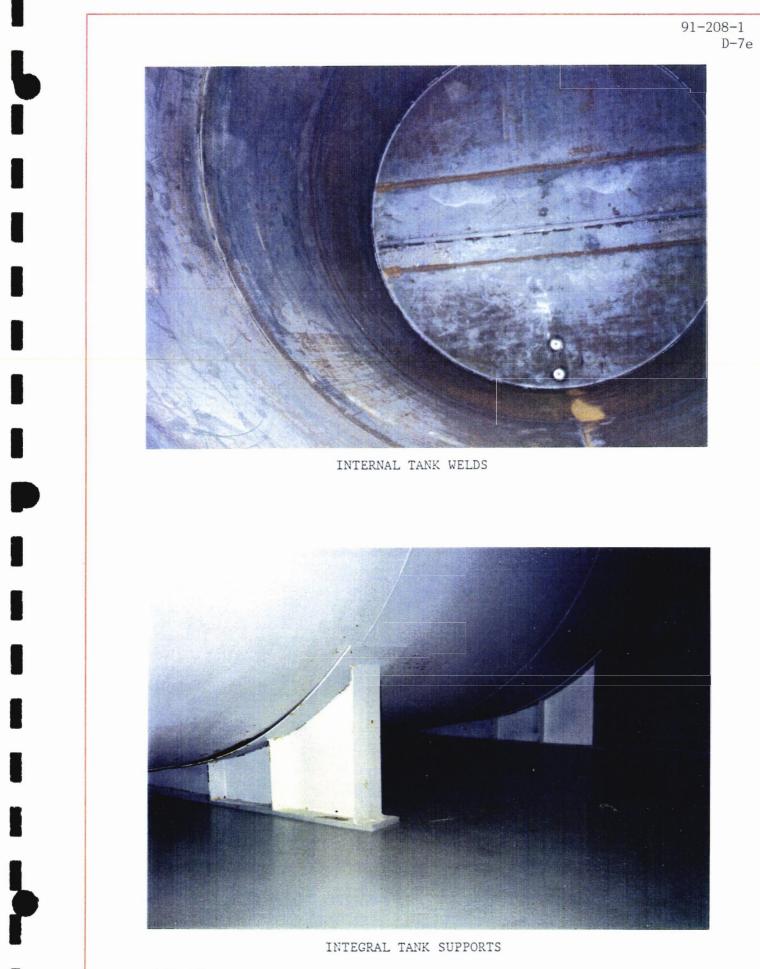
OPEN-MANWAY; EMERGENCY SHUT-OFF AND GATE VALVE

HIGH LEVEL ALARM;LIQUID LEVEL GAUGE; EMERGENCY VENT (MANWAY W/LOOSE BOLTS) USED ANTIFREEZE TANK



NORMAL 3" VENT

91-208-1 D-7d



ATTACHMENT II.C.2

TANK SYSTEM SPECIFICATIONS

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ATTACHMENT II.C.2 TANK SYSTEM SPECIFICATIONS

The facility includes five aboveground steel tanks (Figure II.C.2-1). Used mineral spirits contained in drums returned by the customers are transferred via the wet dumpster into a 15,000-gallon tank, awaiting bulk shipment to the recycle center. The spent antifreeze is transferred from a tanker truck into a 20,000-gallon tank. The other three tanks consist of one 15,000-gallon mineral spirits product tank, one 20,000-gallon nonhazardous waste oil tank, and one 5,000-gallon dry cleaning product tank. These three tanks are not considered RCRA tanks.

MATERIAL COMPATIBILITY

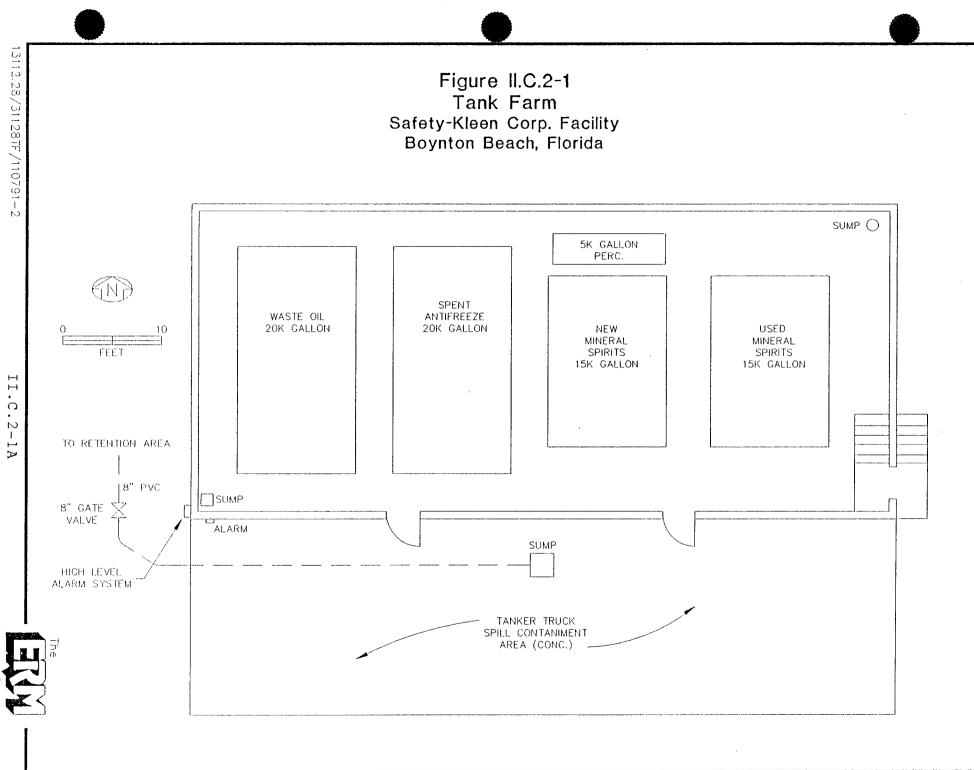
Mineral spirits (petroleum naphtha) is compatible with the mild steel tank structure; in fact, mineral spirits are often used as a light hydrocarbon coating to prevent rusting of metal parts. As with all petroleum storage vessels, water will accumulate over time due to condensation. The mineral spirits has a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the mineral spirits/water interface. Experience, however, has shown that the corrosion potential at the interface is minimal when compared to the potential for corrosion and no separate water plume will form in this tank.

TANK DESIGN AND OPERATION PROCEDURES

Spent mineral spirits from parts washers is accumulated in the 15,000-gallon aboveground storage tank by transfer through the return and fill station. Containers are poured into the dumpsters (barrel washers) in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill station has secondary containment.



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Revised 12/06/9

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The barrel washers are located within the mineral spirits return and fill shelters. The return/fill shelters have been coated with Sikagard[®] 62. When recoating is required in the future, it will be performed using Semstone[®] 140 or equivalent. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detail information on the barrel washers.

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

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used mineral spirits storage tank. There is a basket in the sump that collects sludge. Approximately twice a day, this basket is removed and sludge is removed and placed into a sludge drum for recycle.

The barrel washer is a totally enclosed unit. A small amount of mist is generated while operating the unit. This is controlled by closing the lid of the unit. Spent antifreeze is transferred from a tanker truck into the bulk tank.

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are shown in Figures II.C.2-4(a) and II.C.2-4(b). All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high-level alarms. The design and installation of the tank alarm system is shown in Figures II.C.2-5(a) through II.C.2-5(d). The tank seams are lapped with full fillet welds.



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The barrel washers are located within the mineral spirits return and fill shelters. The return/fill shelters have been coated with Sikagard[®] 62. When recoating is required in the future, it will be performed using Senstone[®] 40 or equivalent. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detail information on the barrel washers.

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The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer). All tanks are new and unused.

Attachment II.C.1 provides an independent assessment of the tank system. The mineral spirits assessment by Wishmeier & Associates includes a detailed description of the tank system components and operation. The assessment of the ethylene glycol tank was prepared by TERA, Inc. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 71' x 32'4" x 6" concrete slab, surrounded by a 36" concrete dike and are in an enclosed building. The dike has been sealed with a chemical resistant coating. Therefore, no surface run-on or precipitation would be in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. Gauges are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) will signal the tank's being 95 percent full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank must be read before filling and before and during the filling of a tanker truck (the available volume of which must be noted prior to emptying the tank) to prevent overfilling of the truck. A suction pump equipped with the tanker truck is used to withdraw used mineral spirits from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station must be cleaned within 24 hours of a spill. The used mineral spirits tank may be operated at a maximum volume of 14, 250 gallons (95 percent). The spent antifreeze tank may be operated at a maximum volume of 19,000 gallons (95 percent).



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Material which collects in the tank dike and return/fill station can be removed using a "wet/dry" vacuum, sorbents, or mop.

"No smoking" signs are posted on the entrance to the tank farm and return/fill station.



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TECHNICAL BULLETIN

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DESCRIPTION AND USES:

SEMSTONE 140 is Sentry's primary epoxy floor topping system for concrete. Self-priming and semi-leveling, it will typically be aggregate filled and spray applied to yield an economical and highly serviceable floor for areas subject to harsh chemical exposure.

SEMSTONE 140 is a two component system that possesses the following characteristics in common with all members of Sentry's 140 family of products:

- excellent resistance to:
 - chemical attack:
 - thermal shock:
 - wear and impact.
- superior bonding qualities;
- high cohesive strength, coupled with the flexibility necessary to resist cracking;
- low permeability;
- low cdcr;
- 100 % solids.

Example uses include:

- Process slabs
- Tank farm floors
- Chemical loading and unloading areas
- Spill containment areas

Waste proof coating for secondary containment systems

PACKAGING/COVERAGE:

SEMSTONE 140 is available in 1 gallon and 5 gallon units. Each unit consists of a premeasured Part A component and a premeasured Part B component.

Coverage rates are effected by the condition of the surface being coated. The following are theoretical coverage rates:

32 sq. ft. per gallon at 50 mils. 12.8 sq. ft. per gallon at 125 mils.

Coverage can be increased by up to 100% when extended with silica aggrogate. (See paragraph 3 of the application guidelines under MIXING AND APPLICATION.)

Application thickness depends upon expected service conditions. Consult Sentry Polymers or your local representative for specific recommendations.



7. 0. 30X 2013A 409-203-0310 1200 2 WWY 332 713-333-1606 (MOUSTON) 5 55557077. 72 77541 500-231-6344 (FACTOR 72 & AA)

SEMSTONE® 140

Sprayable Epoxy Floor Topping

TYPICAL PROPERTIES - WET:

Solids, by Volume	100%
	9.3 ibs
	43 - 60 minutes
	(significantly less at elevated temperatures)
Cure Time @ 75°F:	
Foot Traffic	12 hrs.
Light Venicular Traffic	24 hrs.
•	
Primer	Not Required
Nomlammabie	

TYPICAL PROPERTIES - CURED:

	Light Gray (s	elected other colors available)
		0rs D 70 - 75
Compressive Strength	ASTM C - 579	14,000 psi
Tensile Strength	, ASTM D - 638	5,000 psi
Tensile Elongation	ASTM D - 638	
Flexural Strength	ASTM D - 790	11.000 psi
Fiexural Modulus		
of Elasticity	ASTM C - 722	_ Complies with Epoxy Type B
Abrasion Resistance	ASTM D - 1044	55 mg
		(CS17 wheels)
Water Vacor Transmission	ASTM E - 96	
	WVT	0.0120 grain per hr ft ²
	Permeability	0.0042 permin.

RELATED AND ANCILLARY PRODUCTS:

SEMSTONE 140 - S Epoxy Coating and Lining SEMSTONE 140 - SL Epoxy Self-Laveling Floor Coating SEMSTONE 140 - CT Epoxy Floor Coating - Cold Temperature Formulation SEMSTONE 300 Epoxy Polymer Concrete SEMSTONE 500 Epoxy Putty SEM-CRETE Rapid Hardening Underlayment Mortar SEMSTONE Scrim

Refer to separate technical bulletin on each product for uses, application instructions, etc.

STORAGE AND SHELF LIFE:

Xeeo SEMSTONE 140 components tightly sealed in their original containers until ready for use. Store at 50° - 73°F, out of direct sunlight. Property stored, SEM-STONE 140, has a minimum shelf life of one year.

Refer to patch number on label for date of manufacture.

_ CHEMICAL RESISTANCE GUIDE

This guide is intended as an aid in determining the potential usefulness of SEMSTONE 140 as a protective barrier against memical exposure. Each application should be evaluated according to its particular diroumstances and conditions.



2 = Suitable for shorter term containment and continual spillage

3 - Suitable for intermittent spills when followed promptly with water flushing

NR = Not recommended

C = Consuit Senuy Polymers

Acetic Acid. 10%
Acetic Acid. 30%
Acetic Acid. Glacial
Acetore
Acrylia Acid, up to 25%
Acrylenteile
Alum
(Alumnum Potessium Suifate)
Aluminum Chierice
Aluminum Aucride
Aluminum Hydroxide
Aluminum Nitrate
Aluminum Sulfate
Ammania
Ammonium Bisulfite
Ammonium Chloride
Ammonium Hydroxide
Ammonium Nitrate
Ammonikani Sulfate
n-Amyl Alcohol
Aniting
Refum Chindde
Banum Hydroxide
Banum Suifate
Sarium Sulfide
Benzense
Benzene Sultonic Acid
Senzoic Acid
Black Liquer, Pulp Mill
Biezch Liquer, Fuid Mill
Bleach Liquor, Pulo Mill Borie Acid
Sorie Acid
Sorie Acid
Sonic Acid Brine Bromine, Liquid
Sorie Acid Brine Bromine, Liquid Bromine Gaa (Dry & Wet)
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Sonie Acid Brine Bromine, Liquid Bromine Gaa (Dry & Wet) 5-Sutyl Alcohol
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Sorie Acid Erine Bromine, Liquid Bromine Gae (Dry & Wet) n-Butyl Alcohol Butyl Cellosolve Solvent n-Sutyric Acid Caemium Chloride
Sorie Acid Erine Etemine, Liquid Etemine Gae (Dry & Wet) n-Sutyl Alcohol Sutyl Cellosoive Solvent n-Sutyric Acid Caemium Chloride Calcium Chloride
Sorie Acid Erine Eremine: Liquid Bromine: Gae (Dry & Wet) n-Butyl Alcohol Butyl Cellosolve: Solvent n-Butyric Acid Caemium Chloride Calcium Chloride Calcium Hydroxide
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RATING		RATING		RATIN
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3	Crude Cil. Sour	-	Nitric Acid, 5%	Ī
3	Cruce Cil, Sweet		Nitrie Acid, 30%	NE
	Cyclohexane	3	Nitric Acid. 30%	NE
NR	• •	3	Nine Acid/Suifurie Acid	NR.
NR	Cyclonexanol	3		38
NR	Cyclohexanone	-	Nitrotenzene	
	Dichlorosenzene	NR	n-Octyl Alconol	-
1	Diesei fuel	1	ÇIIS	-
1	Diethyl Sentene	NR	Clean	NR
1	Ethyl Alconol	2	Gleic Acid	3
1	Ethyi Banzene	NR	Cxalic Acid	
1	Elinyi Chioride	NR	Perchiorcethylene	3
1	Ethylena Dichlorida	NR	Perchloric Acid	NR.
2	Ethylene Glycoi	1	Phenol	NP.
-	Fatty Acids	1	Phosphone Acid. 50%	
7	Farric Chloride	4	Phosphoric Acid. 85%	1
1	Ferrie Nitrate	-	Phosphorous Acid	3
-	Ferric Sulfate	-	Potassium Carbonate	
	Ferrous Chloride	1 1 1 1		÷
1		2.0	Potassium Chloride	-
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1	Fuel Oil	1	Progionic Acid	. 2
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1	Glycerine	1	Sodium Acetate	1
2	Heptane	1	Scolum Bloarbonate	-
1	Hexane	1	Sodium Bisulfate	:
1	Hydrobromie Acid	2	Scalum Bisuifite	:
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•	Hydrochlaric Acid, 37%	2	Sodium Chloride	:
1	Hydrofluoric Acid	ē	Socium Chiente	Ni
1	Hydrogen Peroxide	2	Sedium Hydroxide, 10%	•••
NR	Hydrogen Sulfide	1	Socium Hydroxide, 30%	•
NR	iscondy Alcohol	1	Sodium Hypochicrite	2.
	Jet Fuel	1		۷.
2			Socium Suifate	
3	Kercsena	1	Sodium Sulfide	
NR	Lactic Acid	2	Stannic Chicride	
1	Lauryl Chloride	1	Stannous Chionde	
4	Last Acetate	1	Stearic Acid	
1	Linseed Cil	2	Styrene	
2.0	— Littium Bromide	4 •	Sugar/Sucrose	
1	Lithium Chioride	1	Sulfur Dioxide	
1	Lithium Hypochlarite	2.0	Sulfuria Acid. 10%	
1	Uthium Hydraxide	1	Sulfuric Acid, 50%	
1	Magnesium Bisulfite	1	Sulfunic Acid. 98%	₿.
NR	Magnesium Carbonate	4	Tan CB	
NR	Magnesium Chicride	1	Tannie Acid	
• 3	Magnesium Hydroxide	1	Tartaric Acid	
З	Magnesium Sulfate	1	Toluene	
Ĩ	Malsic Acid	2	Toluane Sulforce Acid	
NR	Mercuric Chloride	-	Trientorscatic Acid	
NR	Mercurous Chicnica	-	Trichlersthylane	
5	Marry Alconci	2	Tasodium Phosphata	
- -	Memyi Chlonde	NR	Urea	
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•	Monochiorozosta Adid	3	Xvene	
-	Munatic Add		Zino Chiorice	
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TEMPERATURE CONSIDERATIONS

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 The temperature of the surface to be coated, and the ambient air temperature should be at least 50° F while abolying SEMSTONE 140 and while it cures.

In general, we recommend against applying SEM-STONE 140 if the temperature is expected to drop below 50°F. Instead, use SEMSTONE 140-07.

 Twenty-four hours before application, all materials (components A and B, aggregate, etc.) should be stored at a 70° - 85°F, to facilitate handling.

SURFACE PREPARATION - GENERAL

Surfaces must be dry and free of dirt, dust, oil, grease, chemicals and other contaminants immediately prior to applying each cost of SEMSTONE 140.

SURFACE PREPARATION OF CONCRETE

1. New concrete generally should be curse a minimum of 28 days.

NOTE: Check with Sentry Polymers for recommendations regarding concrete cured less than 28 days.

- Condrete must be structurally sound and must not contain any accelerators or curing compounds.
- 3. Remove all oil and grease.
- 4. Remove all surface laitance and expose sound concrete.

We recommend abrasive blasting to do this. Howeven other methods, such as acid stahing and neutrailing, may be used.

 in general, any existing costing should be completery removed.

In certain instances this may not be necessary, but concult with Sentry Polymers first.

Always remove coatings which have failed due to lack of adhesion or thermal shock.

- Locate all expansion joints, control joints, floor drains, equipment base plates and mid-floor termination points. Handle them as per Sentry's Construction Details Sheet No. S7-1.
- Degraded concrete on horizontal surfaces should be restored using SEMSTONE 300 Epoxy Polymer Concrete or SEM-CRETE.
- Fill all honeycombs, form voids, etc. in vertical surfaces using SEMISTONE 300 Eboxy Putty or SEM-ORETE.

SURFACE PREPARATION OF INCIDENTAL STEEL

Equipment base plates, etc. to be coated along with the concrete should be abrasive blasted to a near white metal finish with a 1 - 2 mil anchor profile. (Ref.SSPC-SP-10)

MASKING

Mask surfaces that are not to be coated. This material is difficult to remove, once applied.

APPLICATION EQUIPMENT

- 1. SEMSTONE 140 may be applied using a spray rig, notched trowal, brush or roller.
- 2. Spraying Aggregata Filled Materiai

We recommend the use of a peristaltic stray rig, such as the Carrousel Fumo by Quik Soray, Fort Clinton, Ohio.

DO NOT use a plural component or a single component airless rig with aggregate filled material.

Set up the constantic rig with a 1 inch ID, 15 foot long material line and a 3 foot pole spray gun.

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Prewet the hoses by pumping a small amount of mixed SEMSTONE 140 (see paragraphs 1 and 2 under MIXING AND APPLICATION) without sagregate through the lines and dole gun; spout 1/2 gailon should be sufficient.

3. Soraying Material Without Aggregate

We recommend the use of a plural component or single component airless rig when the material will be sprayed without aggregate. The penetakic rig can also be used.

Plural Component Alness Soray Equipment (Graco Suildog Hydra-Cat or equal):

Set equipment at a 4 to 1 volumetho mix ratio. Use a Graco Silver Gun, or equivalent, equipped with a reversible, self-pleaning tip. onfice size .035 - .041 incn.

Single Component Airless Spray Equipment (Graco "King" 45 to 1 Hydro Spray Pump, or equal); set up to follows:

No screens, filters or surge tank.

Spray hose should be 1/2" or 3/4" iD, and a maximum of 30 feet in length.

Use Graco Golden Mastic Gun, or equivalent, equipted with a reversible, self-cleaning tip, crifice size .035 - .041 inch.

Inlet air pressure should be a minimum of 100 psi. Recommended operating pressure is 60 - 100 psi.

- 4. Always use spray aculomant in accordance with manufacturer's instructions.
- 5. Care of Soray Rig Hoses

Take care to prevent the mixed material from setting up in your noses. For best resulta, keep your hoses as short as possible, burge them immediately if work is interrupted, keep them out of direct surright and insulated from not surfaces.

MIXING AND APPLICATION

- The components must be individually agitated mediatery prior to use.
 - Part A Blend each Part A component to a uniform consistency in its individual container. Using a Jiffy type mixer.
 - Part 8 Stir each Part 8 component to a Uniform color in its individual container.
- 2. If using a biural component spray rig, skip this step. Otherwise, do this:

Pour the entire contents of Part B into the container holding Part A, and mix thoroughly for two minutes using a lifty type mixer.

The pot life of the mixture will be approximately 45-20 minutes @ 75°F: significantly less time at elevated temperatures.

The longer the material is in the bucket after mixing, the shorter its pot life will be. So, use it immediately.

- SEMSTONE 140 may be extended by adding silical sand. This can provide a more economical floor topping and is also useful when costing rough or mildly eroded concrete.
 - a. Do not add sand to SEMSTONE 140 unless your coating thickness will be at least 75 mils.
 - b. Use only clean, dry, bagged 20/40 mesn round silica sand.
 - c. Pour half the mixed SEMSTONE 140 into enother clean, 5 gailon bucket.
 - Slowly add sand to seen bucket while blending with a Jiffy type mixer. Bo 'both' buckets inght away.
 - e. You may add up to 3 parts. By weight, of sand to 1 part, by weight, of SEMSTONE 140.

At 3 to 1 you get a mixture of proverse consistency.

At 2 to 1, you will obtain a still fluid miniture an externa coverage by 100%. This is the potimum mixture for spray sophistuans.

- f. The mixture may be sprayed or applied by notched trowei.
 - If spraying, work the cole gun in a circular motion
 to achieve an even coating thickness.
- 4. When working a large or congested area, it may be desirable for applicator to wear spiked shoes.
- 5. To obtain a nonskid surface, broadcast your grit media onto the coated surface before the coating jells.
- SEMSTONE 140 is semi-leveling. When used on an area that has a pitch or slope, use a 2 to 1 silica sand mixture (see 3 paragraph above) in order to keep the material from sliding.
- 7. To coat vertical surfaces, we generally recommend our SEMSTONE 140-S Epoxy Coating and Lining system.

However, for convenience, and when service conditions are not rigorous. SEMSTONE 140 may be used to coat short verticals, such as curbs. Multiple coats will probably be required to obtain a coating free of pin holes. We recommend a minimum of three coats. Allow each coat to cure tack free before applying the next coat. Frepare the surface between coats in accordance with paragraph 8.

DO NOT USE AGGREGATE ON VERTICAL SUR-FACES.

- 8. Prepare surfaces for intercoat adhesion as follows:
 - a. Allow SEMSTONE 140 to cure until jelled before recoating.
 - b. If the surface curse firm to the touch, but less than 24 hours, it must be washed with soap and water, rinsed and dried before recoating.
 - c. Surfaces cured beyond 24 hours must be washed with soap and water, rinsed, dried and lightly sanded or abrasive blasted.

- 9. If work is interrupted, and at the end of the day, terminate the coating in a straight line.
- As it cures, SEMSTONE 140 will sometimes develop a thin, oily film on its surface.

This film may be easily removed by wasning with soap and water.

CLEANUP ·

Before it jells, SEMSTONE 140 may be cleaned from tools and equipment using hot, soapy water.

After SEMSTONE 140 jells. Xylene or MEK will be required. Chiorinated solvents may be used if flammable solvents are not allowed.

SAFETY PRECAUTIONS

FOR INDUSTRIAL USE ONLY.

- Avoid contact with eyes and skin; do not ingest or inhale.
 - When working with SEMSTONE 140, always wear chemical goggles, rubber gloves, and appropriate work clothing.

When spraying in a confined area, also wear a fresh air hood and make provision for forced ventilation.

When spraying in an open area, an organic mist respirator can replace the fresh air hood.

Prolonged or repeated exposure to SEMSTONE 140 may cause skin irritation or allergic reactions.

Refer to material safety data sneets regarding individual components.

ATTACHMENT II.C.7

TANK SYSTEM SECONDARY CONTAINMENT



ATTACHMENT II.C.7 TANK SYSTEM SECONDARY CONTAINMENT

TANK CONTAINMENT

All tanks are aboveground, underlain by a 71' x 32'4" x 6" concrete slab, surrounded by a 36" concrete dike and in an enclosed building. The dike has been sealed with a chemical resistant coating. When recoating occurs in the future, the coating used will be Semstone 140 or equivalent. No surface run-on or precipitation would be in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. The layout of the tank storage building is provided in Figure II.C.7-1. Containment calculations are in Figure II.C.7-2.

RETURN/FILL CONTAINMENT

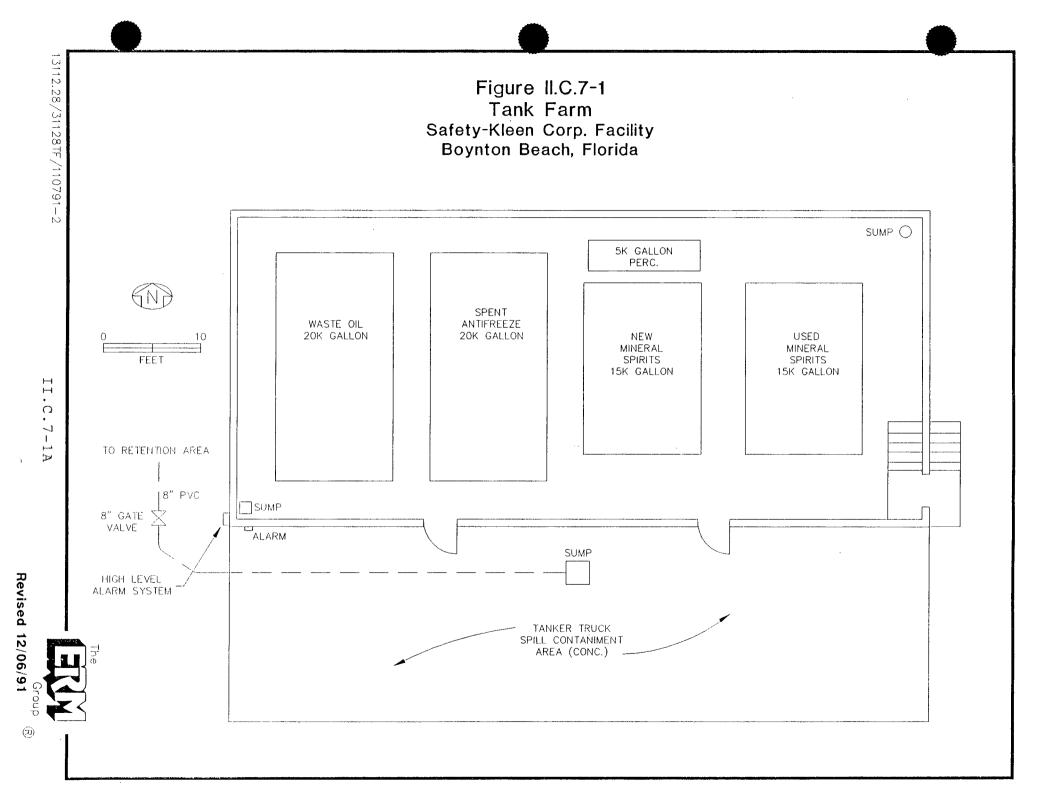
The return/fill shelter is located inside the center portion of the main building. The floor is sloped to a containment trench located in the center of the return/fill shelter. The entire area is coated with a chemical resistant coating. The barrel washers are on a raised grating which measures 54'0" x 78'0" (Figure II.C.7-3).

The area is designed such that the route trucks can be backed inside the building and the garage doors shut so that no precipitation can get into the return/fill shelter containment area. The containment capacity for the return/fill area is 3,626 gallons which exceeds the storage capacity of the two dumpsters (275 gallons per dumpster). The containment calculations are presented in the tank system assessment report (Attachment II.C.1).



II.C.7-2-1

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ATTACHMENT II.C.9

CONTROLS AND SPILL PREVENTION



ATTACHMENT II.C.9 CONTROLS AND SPILL PREVENTION

The tank system is designed to minimize the potential for spills and to control any spills which may occur. The tank area prevention and control system includes proper tanks, and containment walls and trenches. The return/fill shelter consists of dumpsters (barrel washers) located inside a containment area.

The prevention and control system minimizes the opportunity for an uncontrolled release of material to the environment.

DESCRIPTION OF FACILITY

The facility utilizes five aboveground steel tanks. Used mineral spirits housed in containers returned by the customers are transferred via the wet dumpster into a 15,000-gallon tank, awaiting bulk shipment to the recycle center. The spent antifreeze is transferred from a tanker truck into the 20,000-gallon tank. The other three tanks consist of one 15,000-gallon mineral spirits product tank, one 20,000-gallon nonhazardous waste oil tank, and one 5,000-gallon dry cleaning product tank. These three tanks are not considered RCRA tanks.

MATERIAL COMPATIBILITY

Mineral spirits (petroleum naphtha) is compatible with the mild steel tank structure. In fact, mineral spirits is often used as a light hydrocarbon coating to prevent rusting of metal parts. As with all petroleum storage vessels, water will accumulate over time due to condensation. The mineral spirits has a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the mineral spirits/water interface. Antifreeze and water are soluble in all proportions and no separate water plume will form in this tank.



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Spent mineral spirits from parts washers is accumulated in a 15,000-gallon aboveground storage tank via the return and fill station. Used solvent is returned from customers via containers and poured into the barrel washers. The barrel is then placed on roller brushes contained within the barrel washer. As the machine is turned on, the barrel rotates on the brush and the outside of the barrel is cleaned. There is also a nozzle that sprays a stream of solvent into the bottom of the barrel to clean the inside of the barrel. The machine is turned off and the barrel is removed. The procedure takes approximately five seconds per barrel.

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used mineral spirits storage tank. There is a basket in the sump that collects sludge. Approximately twice a day, this basket is removed and sludge is removed and placed into a sludge container for recycle.

The barrel washer is a totally enclosed unit. A small amount of mist is generated while operating the unit. This is controlled by closing the lid of the unit. The spent antifreeze is transferred from a tanker truck into the bulk tank.

TANKS

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are discussed in Attachment II.C.2. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high levelalarms. The tank seams are lapped with full fillet welds. The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer).



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Attachment II.C.1 provides an independent assessment of the tank systems. This assessment includes a detailed description of the tank systems' components and operation. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 71' x 32'4" x 6" concrete slab, surrounded by a 36" concrete dike and are in an enclosed building. The dike has been sealed with a chemical resistant coating. Therefore, no surface run-on or precipitation would be in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. Gauges are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) will signal the tank's being 95 percent full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank must be read before filling and before and during the filling of a tanker truck (the available volume of which must be noted prior to emptying the tank) to prevent overfilling of the truck. A suction pump equipped with the tanker truck is used to withdraw used mineral spirits from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station must be cleaned within 24 hours of a spill. The used mineral spirits tank may be operated at a maximum volume of 14, 250 gallons (95 percent). The spent antifreeze tank may be operated at a maximum volume of 19,000 gallons (95 percent).

Material which collects in the tank dike and return/fill station can be removed using a "wet/dry" vacuum, sorbents, or mop.

No smoking signs are posted on the entrance to the tank farm and return/fill station.



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ATTACHMENT II.C.12(a)

TANK SYSTEM CLOSURE PLAN



ATTACHMENT II.C.12(a) TANK SYSTEM CLOSURE PLAN

CLOSURE INTRODUCTION

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. No onsite disposal activity occurs at any plant and hence no disposal capacity will be exhausted that will necessitate closure of a facility. Based on current business and facility conditions, this facility is expected to remain in operation beyond the year 2000.

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

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

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

An anticipated closure schedule can be seen in Figure II.C.12(a)-1. An anticipated maximum waste inventory for the tank system of the facility is presented in the following section.



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- The dumpsters and the dock area will be cleaned with detergent solution and the rinsate analyzed for mineral spirits, volatile organic compounds, lead, and cadmium to determine the effectiveness of the decontamination. The area will continue to be washed and rinsed until levels are below MCLs, or PQLs if MCLs are not available.
- The rinsing fluids will be discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described Attachment II.C.12(a).
- The cleansed dumpster and dock structure will be reused by Safety-Kleen, or scrapped.
- The cleanup equipment and solutions disposal is the same as that listed earlier.

PHASE I--OPEN THE TANK

- Access to aboveground tanks is obtained by removing manways.
- Prior to opening the tanks, the personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they will be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of the remaining material.



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PHASE II--REMOVING WASTE AND CLEANING TANK

- Before removing the waste from the tank, all piping and appurtenant equipment will be flushed first with clean mineral spirits followed by a detergent solution.
- The method to remove the waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sludge as possible.
- Subsequent to vacuuming the majority of the material from the tank, it may be necessary to use a high pressure wash system using a clean solvent and detergent solution to rinse residual material from the walls and bottom of the tanks. The evacuated material and the rinse solution will be returned to the recycle center for reclamation. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of unnecessary material. The final rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium, using SW-846 to determine the effectiveness of decontamination. The tank will continue to be washed and rinsed until levels are below MCLs, or PQLs if MCLs are not available. Rinsate will be removed using a vacuum tanker truck and will be disposed of as hazardous waste. It is anticipated that approximately 2,000 gallons of rinsate will require RCRA disposal.
- Storage tanks are considered confined spaces, i.e., spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur.
- Confined space entry requires special operating procedures:
 - Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.



II.C.12(a)-4

- Supply valves must be closed and "tagged" and bleeder valves left open, or supply piping should be disconnected.
- Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "OFF."
- On tanks were flammable vapors may be present, all sources of ignition must be removed.
- All tanks must be tested for flammable vapors, toxic gases, or oxygen deficiency in that order, as applicable. The results of such tests should be displayed on the job site.
 - In all tank entering situations, an Oxygen Deficiency Test shall be performed prior to tank entry.
 - Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test."
 - In most circumstances, flash tests and oxygen deficiency tests will be performed by the supervisor of the area in which the work is being performed.
 - Under any conditions where a possibility (no matter how remote) of toxic vapors being present in the tank to be entered exists, the supervisor will arrange to have the air tested.



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- There must be a set of wristlets or a rescue harness and sufficient rope at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.
- ► Workers should wear a rescue harness if entering a tank with a large enough opening to easily effect a rescue. In tanks with small openings, only wristlets may be used. However, in cases where there are agitator shafts, containers, or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the life-line may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- A constant source of fresh air must be provided to ensure a complete change of air every few minutes. In cases of <u>short-term entry</u> for inspection or removal of objects, an air mask is recommended. In cases of <u>long-term entry</u> (generally for repair) the use of an air mover should be considered.
- When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.
- ► Adequate illumination must be provided.
 - A flashlight or other battery-operated light must also be available to provide illumination for safety exit in the event of an electrical power failure.
 - Explosion-proof lighting must be used in any tank used to store flammable liquids.



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- All electrical equipment to be used inside the tank must be in good repair and grounded.
- Others working in the immediate area shall be informed of the work being done and they shall inform the watcher or supervisor immediately of any unusual occurrence which may make it necessary to evacuate the tank.
- The "buddy" (standby observer) system:
 - Men working inside a confined space must be under the constant observation of a fully-instructed standby observer.
 - Before anyone enters the tank, the standby observer will be instructed by the person in charge of the entry that:
 - An entry authorization must be obtained from the person in charge by anyone entering the tank.
 - A rescue harness or wristlets must be on the job.
 - The standby observer must know the location of the nearest telephone (with emergency numbers posted); safety eyewash/shower; fire extinguisher; and oxygen inhalator.
 - For all "hot work" inside a tank, the standby observer must be instructed how to shut down welding/burning equipment.



- As long as personnel are inside the vessel, the standby observer must remain in continuous contact with the worker. <u>HE IS NOT TO LEAVE</u> <u>THE JOB SITE EXCEPT TO REPORT AN EMERGENCY</u>.
- <u>UNDER NO CIRCUMSTANCES SHOULD THE STANDBY</u> <u>OBSERVER ENTER THE VESSEL</u>. If the worker(s) in the tank becomes ill or injured, the watcher is to put in effect the emergency plan described in the attached Standard Operating Procedure.
- The standby observer still **DOES NOT ENTER THE TANK** until help is available.
- After being instructed in his responsibilities, the standby observer will sign an instruction form indicating his understanding.
- Welding and burning within a tank:
 - All welding and burning equipment must be provided with a shutoff device under the control of the standby observer; and the standby observer must know how to shut off the equipment if it becomes necessary.
 - Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
 - For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site.
 - ► Standard welding and burning safety precautions will always be followed.



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PHASE III--REMOVE TANK

- Disconnect and cap all appurtenant piping.
- Disconnect and decontaminate all appurtenant pumping equipment.
- The vessels shall be removed and reused by Safety-Kleen or cut up and sold as scrap.
- The surface soil beneath the fill pipes and beneath each tank will be sampled and analyzed for volatile organic compounds, mineral spirits, lead, and cadmium.
- The secondary containment system will be disassembled. The construction materials will be tested with TCLP (pertinent constituents only). If the construction materials are classified as non-hazardous via TCLP, then they will be disposed of as a solid waste in a sanitary landfill. In the event the construction materials are identified as hazardous via TCLP, then the construction materials will be disposed of as a hazardous waste in accordance with RCRA regulations.
- Contaminated soil, if it exists, shall be removed and properly disposed of. An additional work plan to determine the extent of contamination and remediation procedures will be submitted in this case.

PHASE IV--BACKFILLING AND REGRADING

- Backfill any excavation with previously excavated material with proper compaction.
- Add additional backfill with proper compaction if necessary. The material must be of clean materials and easily compacted in place.
- Regrade the site to proper topography.



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Remove and dispose of nonusable debris.

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 during which wastes are periodically received. Safety-Kleen shall 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 must be amended within 60 days of the changes.
- Within 90 days of receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, Safety-Kleen shall 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

The following requirements are met:

- The facility has the capacity to receive additional wastes;
- There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
- Closure of the facility would be incompatible with continued operation of the site; and



- Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen shall complete closure activities in accordance with the approved closure plan and 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.
- When closure is completed, Safety-Kleen shall submit to the certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.



PART II K

CLOSURE



Revision 2 - 12/06/91

ATTACHMENT II.K.1

CLOSURE PLAN



ATTACHMENT II.K.1 CLOSURE PLAN

CLOSURE INTRODUCTION

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. No onsite disposal activity occurs at any plant and, hence, no disposal capacity will be exhausted that will necessitate closure of a facility. Based on current business and facility conditions, this facility is expected to remain in operation until the year of 2000.

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

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

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

Facility Data

Tank Area

15,000-gallon waste mineral spirits tank in a three-foot-high concrete containment area enclosed inside a building and a 20,000-gallon spent antifreeze tank. This building also



houses one 20,000-gallon nonhazardous waste oil tank, a 15,000-gallon clean mineral spirits tank, and a 5,000-gallon clean perchloroethylene tank.

Container Storage Area:

A 48' x 78' foot area with sloped floor and collection sump. The maximum total volume stored is 18,750 gallons with 6,912 gallons anticipated to be waste mineral spirits dumpster mud containers, dry cleaner wastes, antifreeze, spent immersion cleaner, paint wastes, and/or FRS wastes.

Solvent Return/Fill Shelter:

One 45-foot by 44-foot structure with two solvent return receptacles (wet dumpsters) each and ancillary equipment. Each dumpster can hold 275 gallons of waste.

MAXIMUM INVENTORY OF WASTE

Tank Wastes

The maximum amount of waste mineral spirits in the tank is 15,000 gallons, and spent antifreeze in the tank is 20,000 gallons.

<u>Containerized Waste</u>: Anticipated maximum of 6,912 gallons This amount includes any combination of 5-, 15-, 16-, split 30- (also known as 20gallon), 30-, 55-, and 85-gallon containers.

Dumpsters: 550 gallons (two 275-gallon dumpsters)

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CLOSURE PROCEDURE

Container Storage Areas

- The container storage area houses containers of used immersion cleaner, mineral spirits, dumpster mud, antifreeze, paint waste, dry cleaning wastes, and FRS wastes.
- At closure, all containers will be removed and transported to the recycle center with proper packaging, labeling, and manifesting where the contents in the containers will be reclaimed and the containers will be cleaned for reuse.
- The concrete floor and spill containment areas will be cleaned with detergent solution and the rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium, using SW-846 methods, to determine the effectiveness of decontamination. The area will continue to be washed and rinsed until levels are below maximum contaminant levels (MCLs), or if MCLs are not available, practical quantification levels (PQLs) as specified in Appendix IX of 40 CFR 264.
- 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. It should be noted that wash water and rinsate will <u>not</u> be allowed to drain to the waterway. It is anticipated that approximately 350 gallons of rinsate will require RCRA disposal.
- The equipment 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 hose will be washed with a detergent solution to decontaminate it. The containers will be used to store the wastewater.



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Solvent Return/Fill Shelter Area

- This area is used to return the used mineral spirits to the storage tank.
- Closure of the solvent return receptacles (wet dumpster) will be made prior to the cleaning and removal of the storage tank.
- At closure, the sludge in the dumpsters ("dumpster mud") will be cleaned out and containerized, labeled, and manifested for proper disposal at permitted facilities.
- The dumpsters and the dock area will be cleaned with detergent solution and the rinsate analyzed for mineral spirits, volatile organic compounds, lead, and cadmium to determine the effectiveness of the decontamination. The area will continue to be washed and rinsed until levels are below detectable MCLs, or PQLs if MCLs are not available.
- The rinsing fluids will be discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described herein.
- The cleansed dumpster and dock structure will be reused by Safety-Kleen, or scrapped.
- The cleanup equipment and solutions disposal are the same as those listed earlier.

PHASE I--OPEN THE TANK

- Access to aboveground tanks is obtained by removing manways.
- Prior to opening the tanks, the personnel should have full-face respiratory protection and protective clothing. Once the tanks have been opened they will be provided



with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of the remaining material.

PHASE II--REMOVING WASTE AND CLEANING TANK

- Before removing the waste from the tank, all piping and appurtenant equipment will be flushed first with clean mineral spirits followed by detergent solution.
- The method to remove the waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sludge as possible.
- Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high pressure wash system using clean solvent and detergent solution to rinse residual material from the walls and bottom of the tanks. The evacuated material and the rinse solution will be returned to the recycle center for reclamation. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of unnecessary material. The final rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium, using SW-846, to determine the effectiveness of decontamination. The tank will continue to be washed and rinsed until levels are below MCLs, or PQLs if MCLs are not available. Rinsate will be removed using a vacuum tanker truck and will be disposed of as hazardous waste. It is anticipated that approximately 2,000 gallons of rinsate will require RCRA disposal.
- Storage tanks are considered confined spaces, i.e., spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur.



- Confined space entry requires special operating procedures:
 - Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.
 - Supply valves must be closed and "tagged" and bleeder valves left open, or supply piping should be disconnected.
 - Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "OFF."
 - On tanks where flammable vapors may be present, all sources of ignition must be removed.
 - All tanks must be tested for flammable vapors, toxic gases or oxygen deficiency, in that order, as applicable. The results of such tests should be displayed on the job site.
 - In all tank entering situations, an Oxygen Deficiency Test shall be performed prior to tank entry.
 - Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test."
 - In most circumstances, flash tests and oxygen deficiency tests will be performed by the supervisor of the area in which the work is being performed.



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- Under any conditions where a possibility (no matter how remote) of toxic vapors being present in the tank to be entered exits, the supervisor will arrange to have the air tested.
- A set of wristlets or a rescue harness and sufficient rope must be present at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.
- ► Workers should wear a rescue harness if entering a tank with a large enough opening to easily effect a rescue. In tanks with small openings, only wristlets may be used. However, in cases where there are agitator shafts, containers, or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the life-line may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- A constant source of fresh air must be provided to ensure a complete change of air every few minutes. In cases of <u>short-term entry</u> for inspection or removal of objects, an air mask is recommended. In cases of <u>long-term entry</u> (generally for repair) the use of an air mover should be considered.
- ► When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used.
- Adequate illumination must be provided.
 - A flashlight or other battery operated light must also be available to provide illumination for a safe exit in the event of an electrical power failure.



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- In any tank used to store flammable liquids, explosion-proof lighting must be used.
- All electrical equipment to be used inside the tank must be in good repair and grounded.
- Others working in the immediate area shall be informed of the work being done and they shall inform the watcher or supervisor immediately of any unusual occurrence which may make it necessary to evacuate the tank.
- The "buddy" (standby observer) system:
 - Men working inside a confined space must be under the constant observation of a fully-instructed standby observer.
 - Before anyone enters the tank, the standby observer will be instructed by the person in charge of the entry that:
 - An entry authorization must be obtained from the person in charge by anyone entering the tank.
 - A rescue harness or wristlets must be on the job.
 - The standby observer must know the location of the nearest telephone (with emergency numbers posted); safety eyewash/shower; fire extinguisher; and oxygen inhalator.
 - For all "hot work" inside a tank, the standby observer must be instructed how to shut down welding/burning equipment.



- As long as personnel are inside the vessel, the standby observer must remain in continuous contact with the worker. <u>HE IS NOT TO LEAVE</u> <u>THE JOB SITE EXCEPT TO REPORT AN EMERGENCY</u>.
- UNDER NO CIRCUMSTANCES SHOULD THE STANDBY OBSERVER ENTER THE VESSEL. If the worker(s) in the tank becomes ill or injured, the watcher is to put in effect the emergency plan described in the attached Standard Operating Procedure.
- The standby observer still **DOES NOT ENTER THE TANK** until help is available.
- After being instructed in his responsibilities, the standby observer will sign an instruction form indicating his understanding.
- Welding and burning within a tank:
 - All welding and burning equipment must be provided with a shutoff device under the control of the standby observer, and the standby observer must know how to shut off the equipment if it becomes necessary.
 - Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
 - For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site.
 - Standard welding and burning safety precautions will always be followed.



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PHASE III--REMOVE TANK

- Disconnect and cap all appurtenant piping.
- Disconnect and decontaminate all appurtenant pumping equipment.
- The vessels shall be removed and reused by Safety-Kleen or cut up and sold as scrap.
- The surface soil beneath the fill pipes and beneath each tank (see Exhibit B) will be sampled and analyzed for volatile organic compounds, mineral spirits, lead, and cadmium.
- Contaminated soil, if it exists, shall be removed and properly disposed of. An additional work plan to determine the extent of contamination and remediation procedures will be submitted in this case.
- The secondary containment system will be disassembled. The construction materials will be tested with TCLP (pertinent constituents only). If the construction materials are classified as non-hazardous via TCLP, then they will be disposed of as a solid waste in a sanitary landfill. In the event the construction materials are identified as hazardous via TCLP, then the construction materials will be disposed of as a hazardous waste in accordance with RCRA regulations.

PHASE IV--BACKFILLING AND REGRADING

- Backfill any excavation with previously excavated material with proper compaction.
- Add additional backfill with proper compaction if necessary. The material must be of clean materials and easily compacted in place.



- Regrade the site to proper topography.
- Remove and dispose of nonusable debris.

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 during which wastes are periodically received. Safety-Kleen shall 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 must be amended within 60 days of the changes.
- Within 90 days of receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, Safety-Kleen shall 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

The following requirements are met:

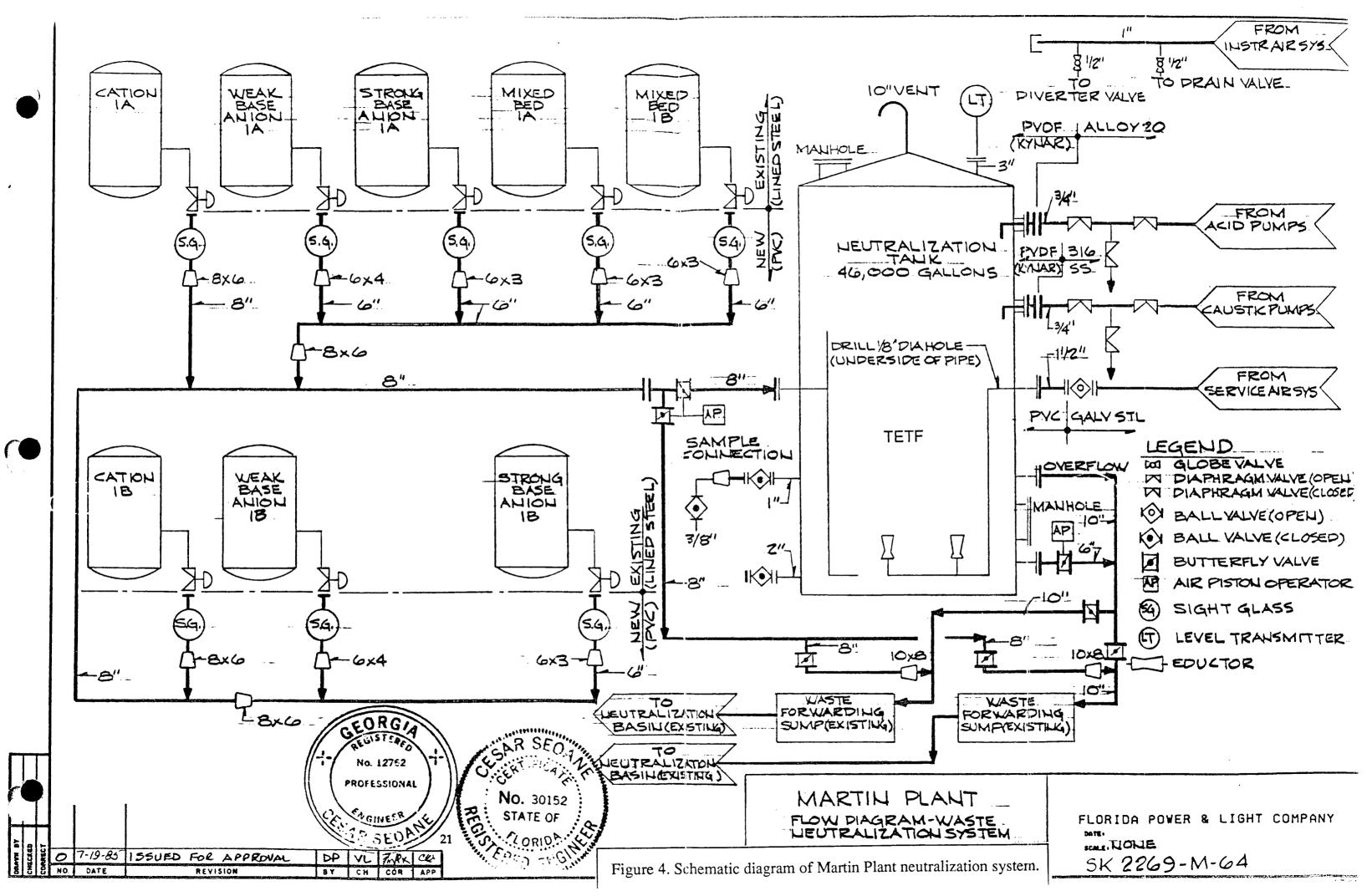
- ► The facility has the capacity to receive additional wastes;
- ► There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
- Closure of the facility would be incompatible with continued operation of the site; and



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- Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen shall complete closure activities in accordance with the approved closure plan and 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.
- When closure is completed, Safety-Kleen shall submit to the certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.





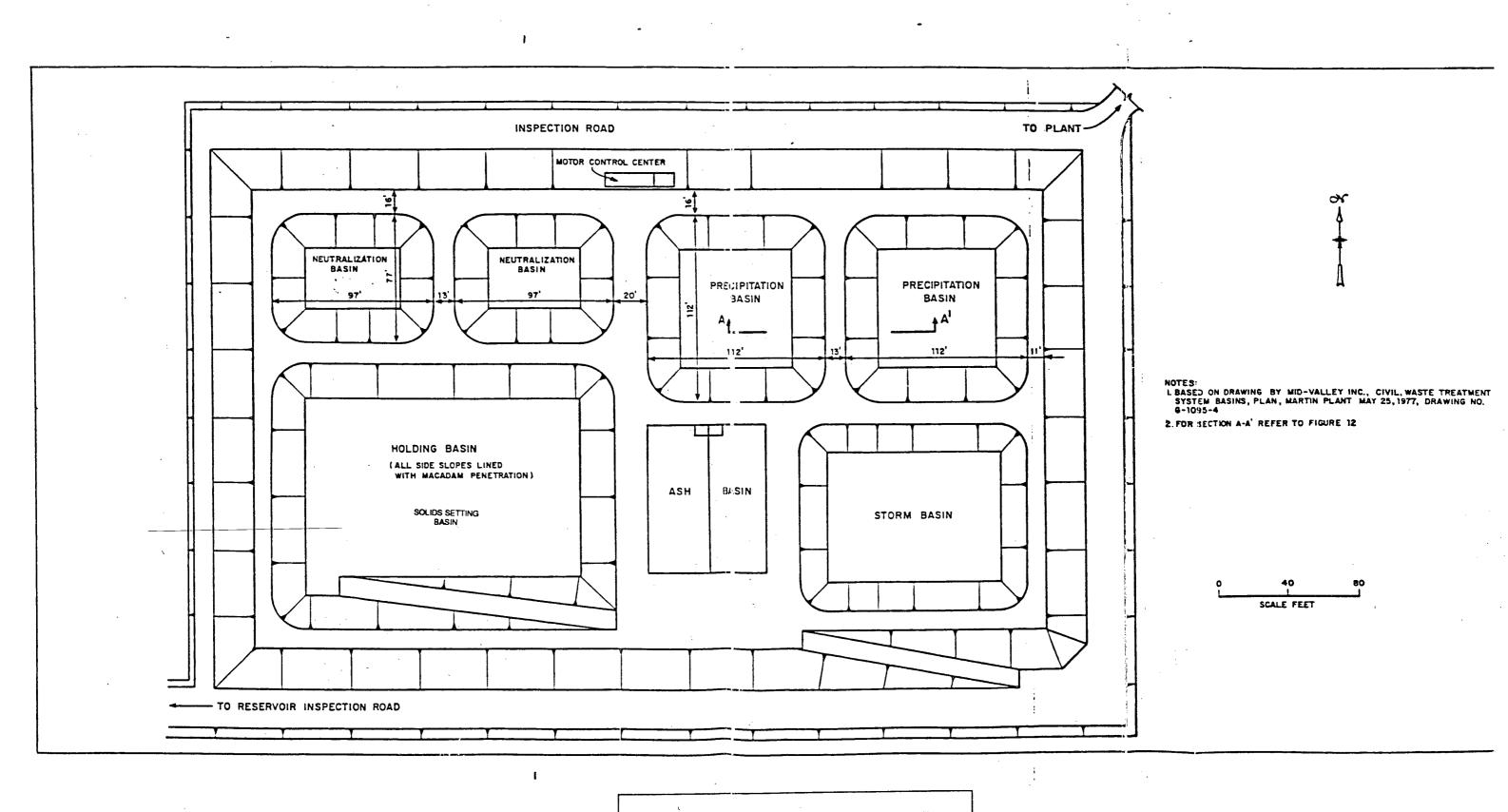


Figure 5. Neutralization basins in plan view.