

DSW, Inc
FLD 020 985727
HC 29-90463
SEP 29 1986

TABLE OF CONTENTS

Hazardous Waste

Tampa, Florida

| | <u>TAB</u> |
|--|------------|
| Preamble | 1 |
| Certification | 2 |
| Part A Application (40 CFR 270.13) | 3 |
| Part B: Topographic Map and Location Information | 4 |
| Part C: Land Use | 5 |
| Part D: | |
| (1) General Description of Facility | 6 |
| (2) Chemical and Physical Analyses | 7 |
| (3) Waste Analysis Plan | 8 |
| (4) Traffic Pattern | 9 |
| (5) Security | 10 |
| (6) Contingency Plan | 11 |
| (7) Procedures and Equipment | 12 |
| (8) Preparedness and Prevention | 13 |
| (9) Training Program | 14 |
| (10) Closure Cost Estimates | 15 |
| (11) Financial Responsibility | 16 |
| 40 CFR 270.15(a) | |
| (12) Containment and Container Practices | 17 |
| (13) Prevention of Ignition and Reaction | 18 |
| (14) General Inspection Schedule | 19 |
| (15) Closure Plan | 20 |
| Appendix: RCRA Compliance -- Administrative | 21 |

PREAMBLE

DSW, Inc., a Washington corporation headquartered at 1600 Norton Building, Seattle, Washington 98104, will acquire this facility on or about October 24, 1986. At the time of acquisition, DSW, Inc. will be a wholly-owned subsidiary of Univar Corporation, a Delaware corporation. DSW, Inc. will operate this facility under the name Van Waters & Rogers. Van Waters & Rogers is the chemical distribution division of Univar Corporation.

The procedures, policies, and personnel in place for McKesson Chemical Company, including the existing arrangement between this facility and McKesson EnviroSystems for waste analysis and recycling, will be maintained pending further review by the new owner. No material changes in these aspects of the operations which require prior notification to appropriate agencies shall be made until such notification has been made and/or other appropriate approvals obtained in accordance with all applicable laws, rules, and regulations.

Unless indicated otherwise, employee training conducted prior to October 24, 1986 was conducted by McKesson Chemical Company. DSW, Inc. has retained the McKesson Chemical training personnel and will continue to use the McKesson Chemical training program.

This permit application is identical to that originally submitted by McKesson Chemical Company except for facility name and ownership changes. Site personnel lists and closure cost estimates have also been updated.

Prior correspondence by McKesson Chemical Company which is relevant to this revised application, such as contingency plan letters and the most recent closure cost updates, is included in this application. All existing agreements relevant to the Contingency Plan will be maintained. The appropriate agencies are being notified of this change in ownership. Original maps, drawings, etc. are on file with the agency and, since no changes to these documents are necessary, they have not been resubmitted in this application.

LAND USE

B. SITE INFORMATION

TOPOGRAPHIC MAP - 1 INCH TO 2000 FEET

TOPOGRAPHIC MAP - 1 INCH TO 200 FEET

100-YEAR FLOODPLAIN DATA

B. SITE INFORMATION

1. FACILITY LOCATION: COUNTY: Hillsborough NEAREST COMMUNITY: Tampa, Florida
LATITUDE: 27° 52' 032" LONGITUDE 082° 23' 005"
2. AREA OF FACILITY SITE (ACRES): Branch is 5.5 acres; storage facility is 400 sq. ft.
3. ATTACH TOPOGRAPHIC MAPS WHICH SHOW ALL THE FEATURES INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.
4. IS THE SITE LOCATED IN A 100-YEAR FLOOD PLAIN? ☒ YES ☐ NO
ATTACH ALL INFORMATION INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.

DSW, Inc.

Site Information - Topographic Maps

A U.S.G.S. 7.5-minute topographic map of the Tampa Quadrangle follows (full quadrangle with original of this application, photocopied segment with copies). Information requested is depicted except for

1. Floodplain area: accompanying segment of FIA map shows McKesson branch to lie on 100-year floodplain.
2. Legal boundaries of branch: defined on following page.

Similarly, a topographic map at a scale of 1 inch to 200 feet follows. The DSW, Inc. hazardous waste facility lies within the DSW, Inc. building identified on the map. Detail too fine to show on this map (access control, loading and unloading areas, hazardous waste unit) can be identified in the third map of this series - the branch site plan drawn by a Florida-certified engineer.

A wind rose for Tampa is included in this section; it was obtained from the U.S. National Climatic Center in Asheville, North Carolina.

REVISED
SEPT. 22, 1986

LEGAL DESCRIPTION

All that tract or parcel of land located in the County of HILLSBOROUGH, State of FLORIDA, described as follows:

TRACT NO. 1

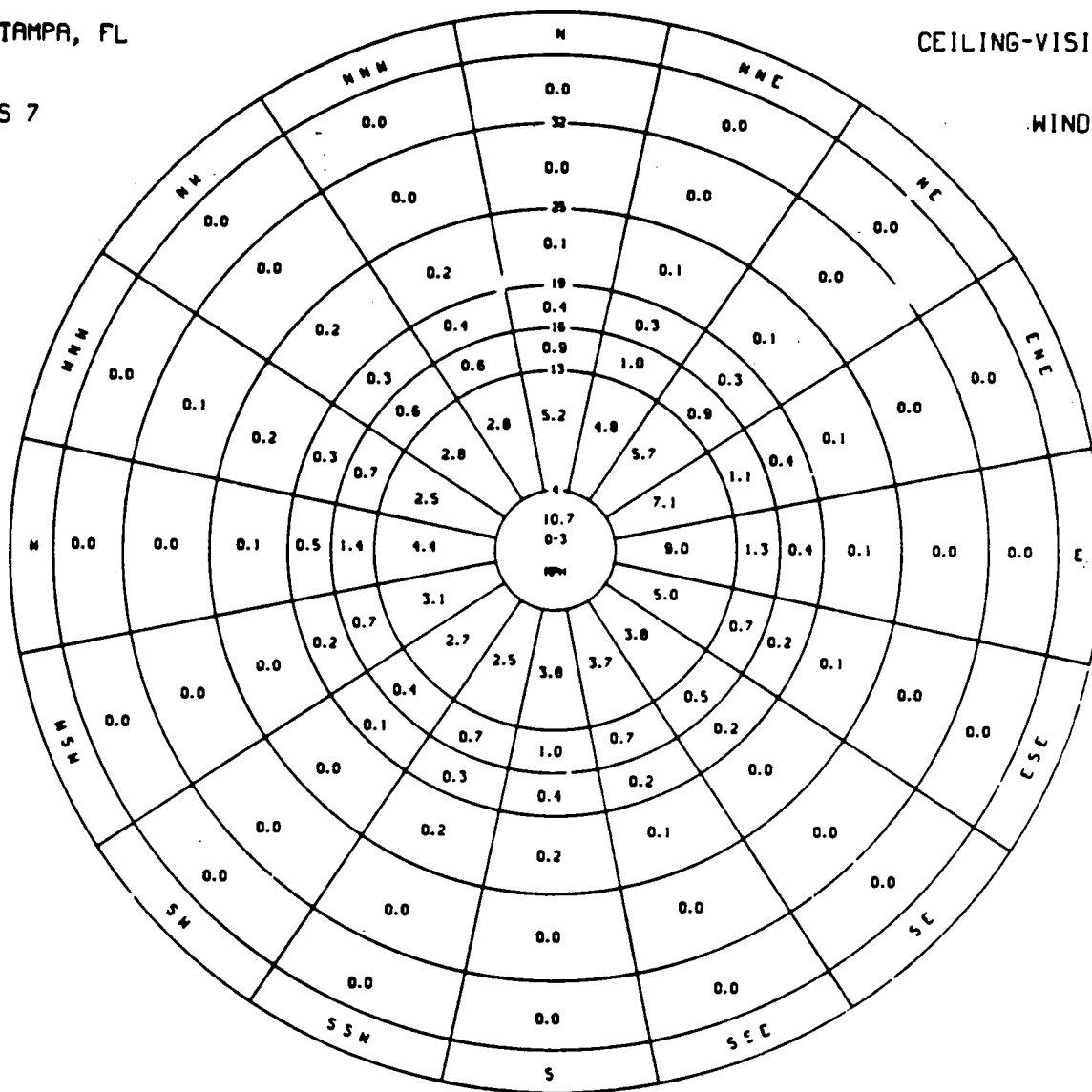
A tract in Section 10, Township 30 South, Range 19 East, Hillsborough County, Florida, described as follows: From the Southeast corner of the Southwest 1/4 of the Southeast 1/4 of Section 10, run West along the South boundary of said Southwest 1/4 of the Southeast 1/4 of Section 10, a distance of 393.38 feet to a point on the Westerly right of way line of that certain road originally known as State Road No. 23 (subsequent known as State Road No. 41-A; not now a State Road); run thence Northwesterly along said Westerly right of way line along a curve to the right (radius -838.25 feet) a distance of 53.43 feet (chord 53.42 feet, chord bearing North 10°18'37" West) to a point of tangency; run thence North 8°40'12" West along said Westerly right of way line a distance of 942.69 feet; run thence North 8°25'45" West along said Westerly right of way line a distance of 238.93 feet; run thence North 8°27'29" West along said Westerly right of way line a distance of 328.74 feet; run thence North 4°19'04" West along said Westerly right of way line a distance of 405.52 feet; run thence Northerly along said Westerly right of way line along a curve to the left (radius 2217.0 feet) an arc distance of 301.47 feet (chord 301.23 feet, chord bearing North 8°12'30" West); run thence North 12°06'32" West along said Westerly right of way line a distance of 431.64 feet; run thence Northwesterly along said Westerly right of way line along a curve to the left (radius 546.11 feet) an arc distance of 242.76 feet (chord 240.74 feet, chord bearing North 24°50'29" West) to a point of beginning; From said point of beginning, continue Northwesterly along said Westerly right of way line along said curve (radius 546.11 feet) an arc distance of 184.33 feet (chord 183.48 feet, chord bearing North 47°14'51" West); run thence North 56°55'02" West along said Westerly right of way line a distance of 154.71 feet; run thence South 67°24'45" West a distance of 572.23 feet to a point on the Easterly right of way line of the Seaboard Coast Line Railroad; run thence South 22°35'15" East along said Easterly right of way line of the Seaboard Coast Line Railroad, parallel to and 65.0 feet Easterly of the centerline of the main track of said Seaboard Coast Line Railroad, a distance of 294.5 feet; run thence North 67°24'45" East a distance of 736.09 feet to the point of beginning.

TRACT NO. 2

A tract in Section 10, Township 30 South, Range 19 East, Hillsborough County, Florida, described as follows: From the Southeast corner of the Southwest 1/4 of the Southeast 1/4 of Section 10, run West along the South boundary of said Southwest 1/4 of the Southeast 1/4 of Section 10 a distance of 393.38 feet to a point on the Westerly right of way line of that certain road originally known as State Road No. 23 (subsequently known as State Road No. 41-A not now a State Road); run thence Northwesterly along said Westerly right of way line along a curve to the right (radius - 838.25 feet) a distance of 53.43 feet (chord 53.42 feet, chord bearing North 10°18'37" West) to a point of tangency; run thence North 8°40'12" West along said Westerly right of way line a distance of 942.69 feet; run thence North 8°25'45" West along said Westerly right of way line a distance of 238.93 feet; run thence North 8°27'29" West along said Westerly right of way line a distance of 328.74 feet; run thence North 4°19'04" West along said Westerly right of way line a distance of 405.52 feet; run thence Northerly along said Westerly right of way line along a curve to the left (radius 2217.0 feet) an arc distance of 301.47 feet (chord - 301.23 feet, chord bearing North 8°12'30" West); run thence North 12°06'32" West along said Westerly right of way line a distance of 431.64 feet; run thence Northwesterly along said Westerly right of way line along a curve to the left (radius 546.11 feet) an arc distance of 427.09 feet (chord 416.28 feet, chord bearing North 34°30'47" West); run thence North 56°55'02" West along said Westerly right of way line a distance of 154.71 feet to a point of beginning; From said point of beginning, continue North 56°55'02" West along said Westerly right of way line a distance of 1014.77 feet to a point on the Easterly right of way line of Seaboard Coast Line Railroad; thence departing from said road right of way line, run South 22°35'15" East along said Easterly right of way line of the Seaboard Coast Line Railroad, parallel to and 65.0 feet Easterly of the center line of the main track of said Seaboard Coast Line Railroad, a distance of 838.0 feet; run thence North 67°24'45" East a distance of 572.23 feet to the point of beginning.

CLASS 7

WIND GRAPH



DSW, Inc.
Floodplain Information

The following FIA map shows this DSW, Inc. branch to lie in a 100-year floodplain. Consequently, a procedure has been developed to remove any hazardous wastes to safety in the event of an impending flood:

1. Responsibility for becoming aware of weather conditions that might lead to a flood condition lies with the Branch Manager, who is also the Emergency Coordinator for this branch. A weather forecast of 5 - 6 inches of rain within a 24-hour period will signal a possible flood condition. The Branch Manager will consult with the local National Weather Service station (645-2181; 645-2506) for any prediction of a flood, and, if indicated, for a projected time and elevation of a flood crest.
2. If a flood prediction is confirmed, arrangements will be made immediately to transfer all drums of hazardous waste to a permitted hazardous waste storage facility, such as Resource Recovery of America, Inc., in Mulberry, Florida (see appended letter).
3. Since no more than 90 drums of hazardous waste will be involved, less than two truckload movements will be required. A typical warning time for a 100-year flood, according to the U. S. Corps of Engineers, is 3 hours. No more than 45 minutes is required to load a truck.

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SEPT. 22, 1986

4. The branch owns its own tractors and trailers, and these would be made available within the warning time. In the event they were on the road and could not be returned in time, a national trucking firm permitted to handle hazardous wastes would be employed; Ryder P.I.E. and Thurston Motor Lines are familiar with DSW, Inc. If the emergency occurred on a weekend or a holiday, warehouse personnel can be brought to the branch in less than an hour. If no one can be located in the case of an impending emergency, the Branch Operations Manager, who is the alternate Emergency Coordinator, is qualified to operate a fork lift and to load the trucks.
5. The branch possesses a battery-operated radio for use in emergencies when power delivery is interrupted.

NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

**HILLSBOROUGH COUNTY,
FLORIDA
(UNINCORPORATED AREAS)**

PANEL 369 OF 825

(SEE MAP INDEX FOR PANELS NOT PRINTED)

**COMMUNITY-PANEL NUMBER
120112 0369 C**

**MAP REVISED:
APRIL 17, 1984**



**REVISED
SEPT. 22, 1986
Federal Emergency Management Agency**



DSW, Inc.

**COASTAL BASE FLOOD
ELEVATIONS APPLY ONLY
LANDWARD OF THE SHORE-
LINE SHOWN ON THIS MAP.**

**ZONE V10—
(EL 11)
8/18/80**

C. LAND USE

ZONING

C. LAND USE INFORMATION

1. PRESENT ZONING OF THE SITE? Tract 1 - Light Industrial; Tract 2 - Heavy Commercial
2. IF A ZONING CHANGE IS NEEDED, WHAT SHOULD NEW ZONING BE? --
3. PRESENT LAND USE OF SITE Chemical Distributor -- Light Industrial

GENERAL

D. OPERATING INFORMATION

DESCRIPTION OF THE OPERATION

WASTES TO BE STORED

QUANTITY OF WASTE TO BE STORED

PROCESS USED TO STORE

CHEMICAL AND PHYSICAL ANALYSES

WASTE ANALYSIS PLAN

BRANCH SCALE DRAWING

TRAFFIC PATTERN

RECORDKEEPING AND REPORTING PROCEDURES

D. OPERATING INFORMATION

1. IS WASTE GENERATED ON SITE? ☐ YES ☒ NO LIST THE SIC CODES (4-DIGIT)
5161

DSW, Inc.

General Description of Facility

DSW, Inc. is a nationwide distributor of various industrial chemicals and solvents. McKesson EnviroSystems, division of the McKesson family, operates a number of recycling plants across the country and functions as a natural partner to the distributor network which DSW, Inc. maintains.

The recycling of spent solvents is but one of the services ~~DSW, Inc.~~ offers to its customers. Many customers who employ its reclaiming services are those who purchased the virgin product from DSW, Inc. in the first place. In this manner, DSW, Inc. provides for its customers to properly manage their wastes and to conserve resources.

The branch in Tampa consists of a prefabricated concrete building of approximately 30,000 square feet. Of this total area, approximately 5,000 square feet is office, and the remainder is warehouse storage. A repackaging room is located on the east side of the warehouse for drumming bulk solvents into 55-gallon drums. A fire-retardant wall separates this room from the main warehouse. This same wall is a divider for the designaged hazardous waste storage area. Overall yard area is about 5.5 acres, all of which is fenced in.

The branch will be utilized by DSW, Inc. as a temporary storage facility for various solvents destined for recycling. The

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SEPT. 22, 1986

operation followed is one of picking up a customer's (generator's) spent materials, bringing the material back to the DSW, Inc. facility, and placing it into temporary storage until a full truckload of various customers' materials are accumulated, and then reshipping the materials to the recycling center. The containers in which these spent materials are shipped to the branch are of a 55-gallon capacity meeting all DOT specifications for the material being shipped in them. All materials are received, stored, and reshipped in the same container.

All movements and handling of materials designated as hazardous wastes at the facility are undertaken in accordance with operational plans as outlined in this application. No treatment, processing, or disposal of hazardous wastes will take place at this facility.

Experience at other branches handling these types of solvent streams indicate the following of industries are served:

Metalworking: A wide variety of metalworking and machinery manufacture operations require a final degreasing step in order to remove lubricating oil, etc.: lathing, grinding, cutting, stamping. The chlorinated solvents are the workhorses of this business.

Electronic: Circuit boards commonly require a de-oiling step to remove lubricants, solder fluxes, and the like. Although the chlorinated solvents are effective, the fluorinated counterparts are generally preferred.

Ink, Adhesives: A wide variety of oxygen - containing solvents is used in cleaning out mixing vats, printing rolls, transfer containers, piping, and so on.

Other Industries: Spent solvent streams have been obtained also from the pharmaceutical, photographic, electrical, textiles, rubber and plastics industries.

This branch and its hazardous waste storage facility handle only containerized wastes - there are no tanks, waste piles, surface impoundments, or incinerators involved. All hazardous wastes to be stored are free liquids.

A site plan of the branch, prepared by a Florida - licensed engineer, follows. The location of the hazardous waste storage facility within the branch is identified.

EPA I.D. NUMBER (enter from page 1)

FOR OFFICIAL USE ONLY

W F L D 0 2 0 9 8 5 7 2 7 1

DUP

2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

| WASTE NO. | A. EPA HAZARD. WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES | |
|-----------|---------------------------------------|---------------------------------------|---------------------------------|--------------------------|---|
| | | | | 1. PROCESS CODES (enter) | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) |
| 1 | F 0 0 1 | 1100 | G S 0 1 | | |
| 2 | F 0 0 2 | 1100 | G S 0 1 | | |
| 3 | F 0 0 3 | 1100 | G S 0 1 | | |
| 4 | F 0 0 5 | 1100 | G S 0 1 | | |
| 5 | D 0 0 1 | 550 | G S 0 1 | | |
| 6 | U 0 0 2 | 550 | G S 0 1 | | |
| 7 | U 0 7 5 | 550 | G S 0 1 | | |
| 8 | U 0 8 0 | 550 | G S 0 1 | | |
| 9 | U 1 4 0 | 550 | G S 0 1 | | |
| 10 | U 1 5 4 | 1100 | G S 0 1 | | |
| 11 | U 1 5 9 | 1100 | G S 0 1 | | |
| 12 | U 2 1 0 | 550 | G S 0 1 | | |
| 13 | U 2 2 0 | 550 | G S 0 1 | | |
| 14 | U 2 2 6 | 1100 | G S 0 1 | | |
| 15 | U 2 2 8 | 1100 | G S 0 1 | | |
| 16 | U 2 3 9 | 550 | G S 0 1 | | |
| 17 | | | | | |
| 18 | | | | | |
| 19 | | | | | |
| 20 | | | | | |
| 21 | | | | | |
| 22 | | | | | |
| 23 | | | | | |
| 24 | | | | | |
| 25 | | | | | |
| 26 | | | | | |

HAZARDOUS WASTE TO BE
STORED AT TAMPA FACILITYIDENTIFICATION AND ANNUAL
QUANTITIES



BROOKS—WADE—AMADEN, INC.

Civil Engineering—Land Surveying

5400 E. DIANA ST.

• P. O. BOX 2641

• TAMPA, FLORIDA 33601

• PHONE 813/621-69

DONALD E. BROOKS

REGISTERED ENGINEER NO. 6401

REGISTERED SURVEYOR NO. 1302

CLARENCE WADE, JR.

REGISTERED SURVEYOR NO. 2430

WALTER D. AMADEN

REGISTERED ENGINEER NO. 16888

July 15, 1976

Mr. Truett Ott
Attorney at Law
1201 Swan Ave.
Tampa, Florida 33606

RE: Bench Mark
Moreland Chemical Co.

Dear Mr. Ott:

This is to advise you, and others that may be concerned, that on July 7, 1976 our firm established a bench mark adjacent to the Moreland Chemical Company, Inc. Property. This work was requested by Mr. Foster, from the Chemical Company offices in Spartanburg, South Carolina. A description of this bench mark is as follows:

Top of nail & cap located between the S.C.L.R.R. rails on Road 41-A, in Section 10, Township 30 South, Range 19 East, Hillsborough County, Florida.

U.S.C. & G.S. Datum
Elevation = 9.25 M.S.L.

This bench was established from a U.S.C. & G.S. bench mark NO. Y-256 (1965), which is located approximately 0.3 miles North of Road 41-A on U.S. Highway 41.

If you have any additional questions, please advise.

Very truly yours,

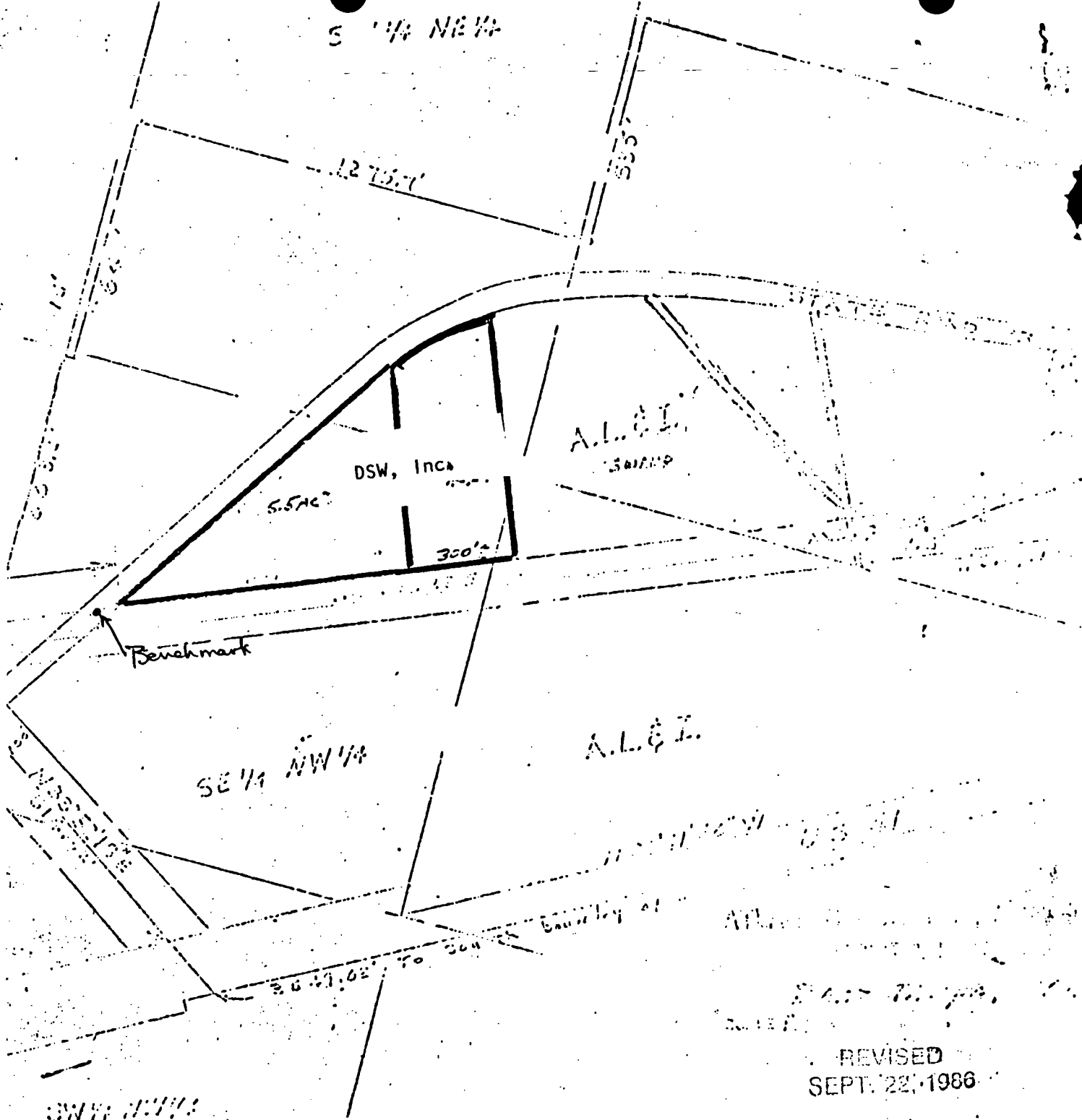
BROOKS-WADE-AMADEN, INC.

Donald E. Brooks

DEB/nc

NW 1/4 NE 1/4

S 1/4 NE 1/4



REVISED
SEPT. 22, 1986

DSW, Inc.

Site Information - Wells

The Southwest Florida Water Management District has identified a number of wells as being located in Section 10 of the preceding U.S.G.S. 7.5 Minute Topographic map; these are checked off in red on the following computer printout pages. Those labelled "A" are for purposes of irrigation, and those labelled "D" are house wells. Injection wells would be labelled "J"; there are none.

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SEPT. 22, 1986

WELL CONSTRUCTION LIST

DATE 4/10/85

| D P | P E | D R | B A | C C | L D | D C | D G | R B | I I | E L | S M | P P | S S | S E | D D | P C | L L | T H | D P | C L | H H | I C | L L | D P | C L | N N | D M | |
|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---|
| U S | M I | L L | U S | I Y | T M | A S | F L | O U | A G | L L | L L | C F | S Z | L L | L L | C C | C C | L L | L L | L L | L L | C C | A C | R R | C C | F F | E R | |
| E | T | L | E | N | V | SETNRB | M | Z | L | T | S | M | V | D | P | L | E | O | E | R | A | A | A | A | A | A | A | R |

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------|------|---|----|----|-------------|---|-----|-----------|-----|---|--|----|--|----|----|----|----|----|----|----|--|--|----|----|-----|----|-------------|-------------|
| WPC353017 | 2076 | A | 13 | 29 | 103018 | 2 | 18 | 65 | | C | | 5 | | | | | | | | | | | | | | | ADAMO, LOUI | |
| WPN365597 | 1056 | A | 13 | 29 | NWME103018 | 4 | *** | CANCELLED | *** | | | | | | | | | | | | | | | | | | | |
| WPN368282 | 1094 | D | 14 | 29 | 103018 | 9 | *** | CANCELLED | *** | | | | | | | | | | | | | | | | | | | |
| WPE376430 | 1598 | D | 14 | 29 | 103018 | 4 | | | | | | | | | | | | | | | | | | | | | YATES, JOHN | |
| WPE376949 | 2250 | D | 14 | 29 | 103018 | 2 | 29 | 90 | 10 | R | | | | | | | | | | | | | | | | | FOSTER, DEN | |
| WPC330009 | 1094 | A | 15 | 29 | 103018 | 2 | 60 | 115 | 23 | R | | 5 | | | | | | | | | | | | | | | RICHMOND, G | |
| WPC304882 | 1057 | D | 13 | 29 | 103018 | 4 | 104 | 170 | | C | | 8 | | | | | | | | | | | | | | | NEWBERN, C | |
| WPE321164 | 1010 | A | 11 | 29 | 103018 | 4 | 67 | 120 | | C | | 6 | | | | | | | | | | | | | | | B NIGMAN | |
| WPE322808 | 1056 | D | 13 | 29 | 103018 | 3 | 52 | 100 | | C | | 6 | | MS | 39 | 11 | | | | | | | 22 | 60 | | | J ARNOLD | |
| WPE330298 | 1056 | D | 13 | 29 | 103018 | 3 | 43 | 106 | | C | | 11 | | MS | 21 | MG | 2 | 47 | | | | | 6 | 23 | 23 | | J ESPY | |
| WPE333809 | 1094 | A | 13 | 29 | 103018 | 4 | 131 | 223 | | R | | | | MS | 12 | HE | 24 | 36 | NA | 19 | | | 74 | TA | 127 | WH | TAMPA ELECT | |
| WPE336960 | 1056 | D | 14 | 29 | 103018 | 5 | 93 | 80 | | C | | 5 | | MS | MD | 17 | WH | 30 | | | | | 40 | 40 | WH | | S FERLITA | |
| WPN355270 | 2250 | A | 14 | 29 | 103018 | 4 | *** | CANCELLED | *** | | | | | | | | | | | | | | | | | | | |
| WPC399040 | 2251 | A | 13 | 29 | 103018 | 4 | 140 | 225 | 29 | R | | 15 | | | | | | | | | | | | | | | JOE LACKEY | |
| WPC399730 | 2251 | D | 11 | 29 | 103018 | 2 | 59 | 72 | 2 | R | | | | | | | | | | | | | | | | | KRAMER & AS | |
| WPC376536 | 1232 | A | 14 | 29 | 113018 | 4 | 105 | 160 | 15 | R | | 4 | | | | | | | | | | | | | | | WARFIELD LA | |
| WPC381021 | 1056 | A | 14 | 29 | NMESW113018 | 4 | 48 | 96 | | C | | 5 | | | | | | | | | | | | | | | CARLTON PRO | |
| WPC394133 | 1232 | P | 11 | 29 | 113018 | 9 | 62 | 160 | | T | | 6 | | | | | | | | | | | | | | | N B DEVELOP | |
| WPE302098 | 1609 | D | 21 | 58 | 153018 | 3 | 63 | 110 | | C | | 8 | | MS | 22 | | 5 | 46 | | | | | 4 | 42 | 62 | | FISHER DR | |
| WPC368598 | 1094 | D | 14 | 29 | 153018 | 2 | 107 | 192 | | R | | 8 | | | | | | | | | | | | | | | ROSAZO, WIL | |
| WPE329157 | 1056 | D | 11 | 29 | 153018 | 3 | 90 | 76 | | C | | | | MS | 43 | | 1 | | | | | | 25 | WH | 25 | WH | SEARS | |
| WPE334609 | 1699 | D | 13 | 29 | 153018 | 4 | 65 | 120 | | C | | | | MS | MH | 55 | NA | 5 | | | | | | 67 | 65 | | PINION, C | |
| WPE312148 | 0332 | D | 14 | 29 | 163018 | 3 | 42 | 102 | | C | | 6 | | | | | | | | | | | | | | | M K SHURLEY | |
| WPE312387 | 0332 | A | 14 | 29 | 163018 | 3 | 42 | 50 | | C | | 5 | | | | | | | | | | | | | | | E L MATTHEW | |
| WPC378214 | 2250 | L | 14 | 29 | 163018 | 2 | 48 | 80 | 10 | R | | 7 | | | | | | | | | | | | | | | CARLEON, DU | |
| WPE328463 | 1010 | A | 14 | 29 | 163018 | 6 | 59 | 135 | | C | | 15 | | MS | LB | 40 | NA | 14 | | | | | | 50 | NA | 50 | NA | JENKINS |
| WPE330457 | 1056 | D | 14 | 29 | 163018 | 3 | 90 | 62 | | C | | 7 | | MS | | 8 | MG | 8 | | | | | | 16 | WH | 16 | WH | E LOPEZ |
| WPE309845 | 0372 | D | 13 | 29 | 173018 | 3 | 52 | 66 | | C | | 15 | | | | | | | | | | | | | 52 | 52 | | R RILEY |
| WPC348708 | 1094 | D | 11 | 29 | 173018 | 2 | 109 | 182 | | R | | 11 | | | | | | | | | | | | | | | FITZGERALD, | |
| WPC350740 | 1281 | D | 11 | 29 | 173018 | 2 | 132 | 132 | | C | | | | | | | | | | | | | | | | | EYDHAHN, BA | |
| WPE320113 | 0334 | A | 14 | 29 | 173018 | 3 | 21 | 60 | | C | | 4 | | | | | | | | | | | | | 15 | 15 | | J T DUYER |
| WPE320378 | 0119 | A | 14 | 29 | 173018 | 3 | 62 | 80 | | R | | 7 | | | | | | | | | | | | | 45 | 45 | | M HENDERSON |
| WPN385056 | 1945 | D | 14 | 29 | 173018 | 2 | *** | CANCELLED | *** | | | | | | | | | | | | | | | | | | | |
| WPN385058 | 1945 | D | 14 | 29 | 173018 | 2 | *** | CANCELLED | *** | | | | | | | | | | | | | | | | | | | |
| WPN385059 | 1945 | D | 14 | 29 | 173018 | 2 | *** | CANCELLED | *** | | | | | | | | | | | | | | | | | | | |

122.25(a) (15,17)

DSW, Inc.

Chemical and Physical Analyses

DSW, Inc. requires all generators who wish to employ the Company's recycling services to provide data defining the chemical make-up of the generator's waste stream before pick-up of the material is initiated.

The DSW, Inc. branch storing the spent solvents, is provided appropriate data from the information furnished by the customer (generator), which will have been reviewed and evaluated by the technical and management personnel at the recycler's facilities.

A full description of the procedures and sequence of events pertaining to the accumulation of data and analytical information made available and kept on file at the DSW, Inc. storage facility before approval to accept materials is outlined in the Waste Analysis Plan in the next section. This procedure describes fully the operation followed in developing and disseminating the necessary information to assure that all facilities handling the material have adequate information available to manage properly a given waste stream.

DSW, Inc. shall provide to off-site generators wishing to utilize its services any requested proof of appropriate permits to be allowed to handle their particular waste streams. Generators shall also be offered the opportunity to take a tour of any company facility, as well as the actual recycling plants, to allow them an opportunity to assure themselves of compliance of these facilities.

REVISED
SEPT. 22, 1986

Wastes Anticipated To Be Handled in Drums At Facility

DSW, Inc.

| <u>Chemical</u> | <u>Hazard</u> | <u>Basis For Hazard Designation</u> |
|---------------------------------------|------------------|-------------------------------------|
| Tetrachloroethylene | Toxic | Listed waste F001, F002 |
| Trichloroethylene | Toxic | Listed waste F001, F002 |
| Methylene Chloride | Toxic | Listed waste F001, F002 |
| 1,1,1 Trichloroethane | Toxic | Listed waste F001, F002 |
| Carbon Tetrachloride | Toxic | Listed waste F001 |
| Chlorinated Fluorocarbons | Toxic | Listed waste F001 |
| Chlorobenzene | Toxic | Listed waste F002 |
| Ortho-Dichlorobenzene | Toxic | Listed waste F002 |
| Trichlorofluoromethane | Toxic | Listed waste F002 |
| 1,1,2-Trichloro-1,2,2-Trifluoroethane | Toxic | Listed waste F002 |
| Xylene | Ignitable | Listed waste F003 |
| Acetone | Ignitable | Listed waste F003 |
| Ethyl Acetate | Ignitable | Listed waste F003 |
| Ethyl Ether | Ignitable | Listed waste F003 |
| Methyl Isobutyl Ketone | Ignitable | Listed waste F003 |
| n-Butyl Alcohol | Ignitable | Listed waste F003 |
| Cyclohexanone | Ignitable | Listed waste F003 |
| Methanol | Ignitable | Listed waste F003 |
| Toluene | Toxic, Ignitable | Listed waste F005 |
| Methyl Ethyl Ketone | Toxic, Ignitable | Listed waste F005 |
| Isobutanol | Toxic, Ignitable | Listed waste F005 |

The above will also be expected in the form of blends with each other, still in drums.

REVISED
SEPT. 22, 1986

Other wastes that could be expected to be stored are mixtures of the preceding listed solvents. The EPA hazard bases are either "Ignitable," "Toxic," or both. The EPA waste number is F001, F002, F003, F005, or combinations. The basis for the hazardous designation is "listed waste." Typical examples of mixed spent solvents wastes are:

* Waste solvent from the pharmaceutical industry -

| | |
|-----------------------|-------------|
| Ortho-dichlorobenzene | 90 Volume % |
| Methylene Chloride | 7 Volume % |
| Water | 3 Volume % |

* Waste solvent from the paint industry -

| | |
|-----------------------------|-------------|
| Methyl Ethyl Ketone | 10 Volume % |
| Methyl Isobutyl Ketone | 3 Volume % |
| Toluene | 32 Volume % |
| Xylene | 45 Volume % |
| n-Butyl Acetate | 2 Volume % |
| Isopropyl Acetate | 2 Volume % |
| Water | 1 Volume % |
| Resins, Pigments, Adhesives | 5 Volume % |

* Waste solvent from the electronics industry -

| | |
|------------------------|-------------|
| 1,1,1-Trichloroethane | 80 Volume % |
| Trichlorofluoromethane | 15 Volume % |
| Resin, Flux, Pigments | 5 Volume % |

* Waste solvent from the metal working industry -

| | |
|--------------------------------|-------------|
| Perchloroethylene | 40 Volume % |
| Methylene Chloride | 25 Volume % |
| Trichloroethylene | 15 Volume % |
| Soil, Grime, Grit, Oil, Grease | 20 Volume % |

Still another group of wastes that could be received at this facility are those not listed as hazardous wastes, but do exhibit the characteristics of ignitability, the EPA hazard basis is "Ignitable", the EPA waste number is D001, and the basis for hazardous designation is a flashpoint of 140°F or less. The spent solvents can be received as individual chemicals or a mixtures thereof. Examples are:

| <u>Chemical</u> | <u>Flashpoint (°F)</u> |
|--------------------|------------------------|
| Amyl Acetate | 77 |
| p-Amyl Acetate | 77 |
| Butyl Acetate | 72 |
| s-Butyl Alcohol | 75 |
| t-Butyl Alcohol | 52 |
| Cellosolve Acetate | 117 |
| Cyclohexane | -4 |
| Cyclohexanone | 111 |
| Diisobutyl Ketone | 120 |
| Ethyl Alcohol | 55 |
| Ethyl Cellosolve | 80 |
| Heptane | 25 |
| Hexane | -7 |
| Lactol Spirits | 20 |
| Methyl Acetate | 14 |
| Methyl Amyl Ketone | 120 |
| Methyl Cellosolve | 115 |
| Petroleum Naphtha | 105 |
| Propyl Acetone | 58 |
| iso-Propyl Acetate | 40 |
| Propyl Alcohol | 77 |
| Iso-Propyl Alcohol | 53 |
| VMP&P Naphtha | 105 |

Some waste generators prefer to identify their used solvents as "discarded commercial chemical products" rather than as "spent solvents." The EPA hazard codes, waste names, and EPA waste numbers for those expected at this DSW, Inc. facility follow. The basis for hazardous designation is "listed waste."

| | | |
|------|-------------------------|-------|
| U002 | Acetone | (I) |
| U075 | Dichlorodifluoromethane | (T) |
| U080 | Methylene Dichloride | (T) |
| U140 | Isobutyl Alcohol | (I,T) |
| U154 | Methanol | (I) |
| U159 | Methyl Ethyl Ketone | (I,T) |
| U210 | Tetrachloroethylene | (T) |
| U220 | Toluene | (I,T) |
| U226 | 1,1,1-Trichloroethane | (T) |
| U228 | Trichloroethylene | (T) |
| U239 | Xylene | (I) |

SITE

____ DSW, Inc.
Waste Analysis Plan

This branch of DSW, Inc. is seeking a permit to function simply as a short-term storage facility (probably less than a month) for a limited variety of spent organic solvents. These will be handled only in DOT-approved drums, and will usually have been picked up in small numbers from customers who had previously purchased the virgin material from DSW, Inc. Once a sufficient number of drums has been accumulated at the branch to make transport economically feasible, they will be moved to a recycler - McKesson Envirosystems - for reclaiming.

Each branch of DSW, Inc. organizationally is a financial entity unto itself - in other words, it is a small chemical business. Typical of such small chemical distributorships, which carry out no manufacturing processes, the branch has no laboratory facilities. It would be uneconomic and financially impossible to hire technical personnel and to equip a laboratory for the limited amount of material being handled. Even the cost of outside analytical work would be prohibitive, especially in view of the fact that such analytical work would duplicate the effort carried out by McKesson Envirosystems.

On the other hand, the objective of a profitable reclaiming business is thwarted unless the major constituents of the spent solvent stream ~~or other designated recycler.~~

REVISED
SEPT. 22, 1986

being handled are known accurately. To this end, McKesson Envirosystems maintains and operates a sophisticated analytical laboratory at each of its reclaiming facilities.

After a proposed waste stream from a new or existing customer (the generator) is evaluated for its economic value by McKesson Envirosystems and a purchase agreement is completed between McKesson Envirosystems Company and the customer, a sample is submitted by way of DSW, Inc. to McKesson Envirosystems and appropriate analyses over and beyond mere assay of content of the reclaimable solvent are carried out. These will vary from waste stream to waste stream, and reflect a principle of the recycling business - that in most cases exact knowledge of each component present is not required because after a spent solvent is "cleaned" by distillation, the subsequent product is invariably sold by physical characteristics, not by chemical structure. Thus in order to transport, store, and distill spent material only a minimum of information about its composition is required.

The major concerns are (1) verification of the recoverable value of the spent solvent and (2) confirmation of any "warning" information, such as pH or ignitability. The parameters measured vary from waste stream to waste stream; examples of the major parameters needed by the recycler and the rationale for their selection appear in the appended table.

The results of these analyses are reported on a "Results of Laboratory Analysis" form, a copy of which follows; a copy of the completed ~~or other designated recycler.~~

SPENT SOLVENT STREAM -- RESULTS OF LABORATORY ANALYSIS

State Hgh 146

P O Box 406

New Castle, KY 40050

☐ 633 East 138 TH St

P O Box 100

Dolton, IL 60419

☐ KM 51, Highway 2

P O Box 1028

Manati, PR 00701

| | | | | | |
|--------------------------|-------|--------------------------|-------|--------------------------|-------|
| <input type="checkbox"/> | _____ | <input type="checkbox"/> | _____ | <input type="checkbox"/> | _____ |
| | _____ | | _____ | | _____ |
| | _____ | | _____ | | _____ |

Part A- Spent Stream Identification

Sample Date: _____

Customer Name _____

& Location _____

Spent Stream Name _____

& Misc Information: ☐ - In Bulk ☐ - In Drums Est. Volume- _____

Part B- Basic Required Laboratory Analysis - RCRA (Federal) and Hazardous Waste Regulations (State)

Concentration of Components, Organic Analysis by Gas Chromatography:

| COMPONENT | CONC % | V/V | W/W | COMPONENT | CONC % | V/V | W/W | COMPONENT | CONC % | V/V | W/W |
|-----------|--------|-----|-----|-----------|--------|-----|-----|-----------|--------|-----|-----|
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

Mixture Specific

Gravity @ 25 C _____

Date Sample Analyzed _____

Part C- Additional Laboratory Analytical Results for Streams with Characteristics of Ignitability or Corrosivity:

- Flash Point _____ Method _____
- pH _____ Notes _____

Part D- Stream Information not Involved in Hazardous Waste Regulations but Related to Evaluation Economics, Plant Recovery Efficiencies, Volume of Unrecovered Residues and Similar Factors.

| Item / Description | Result | Item / Description | Result |
|----------------------|--------|--------------------|--------|
| Moisture/water, wt % | | Solids, wt % | |
| BTU | | Ash | |
| Color | | Odor | |
| Lab Recovery % | | Chlorides | |
| | | | |
| | | | |
| | | | |

Chemist/Technician Signature _____ Date _____ Review By _____ Notes _____

PARAMETERS MEASURED IN EVALUATION OF SPENT SOLVENT STREAMS

A. By McKesson Envirosystems on Pre-shipment Sample

| <u>PARAMETER</u> | <u>TEST METHOD</u> | <u>PURPOSE</u> |
|------------------|---|--|
| Assay | Gas Chromatograph | To confirm identity, amount of recoverable component(s), and major containments, if any. |
| Specific Gravity | Hydrometer and glass cylinder (graduate), as exemplified by ASTM D2111-71 | Useful in product identity; permits conversion of volume to weight. |
| Water | Titrimetric (Karl Fischer) | Possible contamination. |
| Flash Point | Closed cup ASTM D-93-79 (SW-846 4.1-1) | Flammability danger. |
| pH | Electrometrically (SW-846 5.2) | Danger of corrosion. |

B. By DSW, Inc. Branch on Actual Shipment

| <u>PARAMETER</u> | <u>TEST METHOD</u> | <u>PURPOSE</u> |
|------------------|--|--|
| Specific Gravity | Hydrometer as exemplified by ASTM D2111-71 | To compare with pre-shipment sample and previous shipments. |
| Appearance | Visual examination of sample for color, clarity, phase separation. | To compare with pre-shipment sample and previous shipments. |
| pH (if aqueous) | pH paper | To define acidity or alkalinity for comparison with pre-shipment sample and previous shipments (will usually not be relevant). |

REVISED
SEPT. 22, 1986

form is sent to the DSW, Inc! branch prior to the branch's sending a truck to bring the drums of spent solvent back to the branch.

These physical and chemical analyses of each waste stream will be repeated when .

- (1) It is necessary to ensure that they are accurate and up-to-date.
- (2) The branch is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed.
- (3) A manifest discrepancy is detected (unless the branch chooses to return the shipment to the generator).

Upon receipt of these drums of solvent, the DSW, Inc. branch has the responsibility of measuring a sufficient number of parameters to assure the branch that the customer did indeed send what he had agreed to. This consideration leads to the selection of "fingerprint" parameters, the measurement of which will provide reasonable assurance to the branch that the drums of spent solvent received from a generator actually contain what the customer agreed to submit as established by the analysis by McKesson EnviroSystems of the corresponding sample. In addition to comparing the information on the manifest as to number of drums and their contents as defined on the hazardous waste labels, the following physical data will be determined at the branch on samples taken from an appropriate number of drums from each waste

stream:

1. Physical state of the spent solvent, including phase separation.
2. Color and texture.
3. Whether the liquid is substantially aqueous, organic, or both.
4. The pH of any aqueous waste.
5. Specific gravity.

The method of sampling the drums is described in the appended "Standard Procedure for Sampling Waste Containers".

Ten per cent of the number of drums in a given waste stream, rounded up to the next higher whole number, will be sampled; thus,

1. For 1 - 10 drums of a single waste stream, one drum sampled;
2. For 11 - 20 drums, two drums sampled;
3. For 21 - 30 drums, three drums sampled; and so on.

The results of the measurements of the fingerprint parameters selected for a given waste stream will be compared to the values obtained from previous shipments of that stream and will be required to fall within an established range ("plus or minus") for that parameter, such range having been established over a period of time based on observed values for that waste stream from that customer. However, at this point in time relative to the hazardous waste storage activity at this DSW, Inc. branch, there are no long-term established customers and consequently no body of historical information descriptive of

the industrial processes generating corresponding waste streams.

Therefore, until sufficient information is obtained to permit establishing a "specification" for an acceptable waste stream, two approaches will be undertaken to provide standards against which to compare subsequent samples taken from a given waste stream upon its arrival at the branch:

1. For a quantitative value - e.g., specific gravity - plus or minus 20% of the value determined from the pre-shipment sample.
2. For qualitative values (color, phase separation, etc.) comparison against records of the same stream from a previous shipment. A significant deviation in color or general appearance (e.g., content of sediment) will lead to consideration of rejection of the shipment.

The sampling of the wastes and the verification steps previously described will be carried out in the waste storage area. Any remaining sample material will be returned to the drum from which it was taken. the sampling and verification steps will be carried out by the facility Operations Manager.

All these data and observations will be recorded at the branch and maintained as part of the branch's operating record.

The sampling procedure and the procedure for determination of specific gravity follow.

STANDARD PROCEDURE
For
SAMPLING WASTE CONTAINERS

Uniform Requirements for Sample Taking

Personnel Safety Precautions

Prior to opening the container for sample withdrawal, the employee who is to do the sampling must be wearing his hardhat, his safety glasses, and his solvent-impervious gloves.

The equipment required in order to obtain a sample consists of:

- A Coliwasa type sampling tube.
- A clean, dry glass sample bottle.
- A screw-cap for the sample bottle which is fitted with a polyethylene poly-cone seal.
- A label containing the following information:
 - The manifest number corresponding to the waste shipment.
 - The name of the waste being sampled.
 - The date on which the sample is taken.
 - The name of the employee withdrawing the sample.

CAUTION: Always leave about one-inch of free space in the sample bottle before it is closed. Never fill the sample bottle to the brim. Quite frequently the sample is withdrawn at a temperature which is less than the temperature in which the sample will be stored prior to analysis. As the temperature increases, the liquid expands. If the sample bottle is completely filled, the expanding liquid has no place to go and it will shatter the bottle.

Sampling Procedure for Drums

1. Sampling is done through the bung on the drum. When removing the bung closure of the drum, first loosen it slightly without completely removing the bung in order to relieve any internal pressure which may have been built up because of change in temperature.
2. After you are sure that there is no pressure in the drum, remove the bung closure completely.
3. Open the bottom valve of the Coliwasa type sampler completely.
4. Lower the sampler slowly into the drum until the bottom of the sampler reaches the bottom of the drum.
5. Close the bottom valve of the Coliwasa type sampler completely.
6. Withdraw the sampler from the container.
7. Transfer the content of the sampler to the sample bottle.
8. Screw the cap tightly onto the bottle.
9. Affix the appropriate label to the bottle.
10. Wipe any spillage from the outside of the bottle.
11. Clean the Coliwasa sampler prior to using it on the next drum.
12. Inspect the gasket on the drum closure to make sure it is in good condition.

Disposition of the Sample

After the samples have been taken, the sampling containers closed, the labels affixed, and the sample containers wiped off, take the samples to the laboratory and turn them over to the chemist for analysis.



Designation: D 2111 - 71 (Reapproved 1978)

Standard Test Methods for SPECIFIC GRAVITY OF HALOGENATED ORGANIC SOLVENTS AND THEIR ADMIXTURES¹

This standard is issued under the fixed designation D 2111; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (ϵ) indicates an editorial change since the last revision or reapproval.

These methods have been approved for use by agencies of the Department of Defense and for listing in the DoD Index of Specifications and Standards.

1. Scope

1.1 These methods cover the determination of the specific gravity of halogenated organic solvents and solvent admixtures. They define suitable apparatus and procedures and furnish details underlying the interpretation of test data and the selection of numerical limits for agreement among interested persons and agencies.

1.2 Four methods are covered as follows:

1.2.1 *Method A*, specific gravity by means of a specific gravity balance.

1.2.2 *Method B*, specific gravity by means of a hydrometer.

1.2.3 *Method C*, specific gravity by means of a pycnometer.

1.2.4 *Method D*, specific gravity by means of a vacuum pycnometer.

NOTE 1—In referee problems, Methods A, C, or D may be used.

2. Definitions

2.1 *specific gravity*—the ratio of the weight in air of a given volume of the material at a stated temperature to the weight in air of an equal volume of distilled water at a stated temperature. It shall be stated thus:

2.1.1 When the temperatures of the material and of the water are the same:

Specific gravity x/x C....

where x = temperature of the material and the water.

2.1.2 When the temperature of the material and of the water are not the same:

Specific gravity x/y C....

where:

x = temperature of the material, and

y = temperature of the water.

2.1.3 *specific gravity, absolute*—the ratio of the weight referred to vacuum of a given volume of the material at a stated temperature to the weight referred to vacuum of an equal volume of gas-free distilled water (Note 2) at a stated temperature. It shall be stated as in 2.1.

NOTE 2—Gas-free distilled water is distilled water that has been boiled to eliminate dissolved gases.

3. Test Temperatures

3.1 Material specifications often specify different temperatures at which specific gravity shall be measured:

Specific gravity 15/4 C
Specific gravity 20/20 C
Specific gravity 25/25 C

For purposes of unity, the test temperature used throughout shall be 25/25 C.

3.2 For some of the liquids, an agreement may be reached as to the coefficient of expansion of the product. In such cases, the specific gravity may be changed from one temperature basis to another as described in Section 14.

¹ These methods are under the jurisdiction of ASTM Committee D-26 on Halogenated Organic Solvents. Current edition effective April 15, 1971. Originally issued 1962. Replaces D 2111-64.

METHOD B—SPECIFIC GRAVITY BY MEANS OF A HYDROMETER

7. Apparatus

7.1 Hydrometer—The hydrometers to be used shall be those specified in ASTM Specification E 100, for ASTM Hydrometers¹ as follows:

| Nominal Specific Gravity Range | ASTM Hydrometer No. |
|--------------------------------|---------------------|
| 0.900 to 0.950 | 107H |
| 0.950 to 1.000 | 108H |
| 1.000 to 1.050 | 125H |
| 1.050 to 1.100 | 126H |
| 1.100 to 1.150 | 127H |
| 1.150 to 1.200 | 128H |
| 1.200 to 1.250 | 129H |
| 1.250 to 1.300 | 130H |
| 1.300 to 1.350 | 131H |
| 1.350 to 1.400 | 132H |
| 1.400 to 1.450 | 133H |
| 1.450 to 1.500 | 134H |
| 1.500 to 1.550 | 135H |
| 1.550 to 1.600 | 136H |
| 1.600 to 1.650 | 137H |

7.2 Hydrometer Cylinder—The vessel in which the sample for the gravity test is confined shall be made of clear glass and shall be cylindrical in shape. For convenience in pouring, it may have a lip on the rim. The inside diameter shall be at least 25.4 mm (1.0 in.) greater than the outside diameter of the hydrometer used in it. The height of the cylinder shall be such that the length of the column of sample it contains is greater by at least 25.4 mm (1.0 in.) than the portion of the hydrometer that is immersed beneath the surface of the sample after a state of equilibrium has been reached.

7.3 Thermometer—See 4.3.

7.4 Water Bath—See 4.4.

8. Procedure

8.1 Cool the sample in the original container to about 24 C. Rinse each piece of equipment with a portion of the sample. Pour the sample

¹ Annual Book of ASTM Standards, Part 25 and 44.

into the clean hydrometer cylinder without splashing, so as to avoid formation of air bubbles. Remove any air bubbles adhering to the surface by touching them with a piece of clean filter paper. Select a location that is free of air currents. Place the cylinder vertically in the water bath and let the temperature of the sample reach 25.0 ± 0.5 C as follows: Stir the contents of the cylinder, being careful to avoid formation of air bubbles. When the temperature of the sample is 24.5 C, slowly and carefully lower the hydrometer into the sample to a level two smallest scale divisions below that at which it will float and then release the hydrometer. After it has come to rest and floats freely away from the walls of the cylinder, read the gravity at the point at which the surface of the sample apparently cuts the hydrometer scale.

8.2 When the temperature is 25.0 C, make this observation by placing the eye slightly below the level of the liquid and slowly raise the eye until the surface of the sample first seen as a distorted ellipse seems to become a straight line cutting the hydrometer scale. Determine the temperature of the sample just before and also, for referee tests, just after reading the hydrometer.



DSW, Inc:

Traffic Patterns

The DSW, Inc, branch in Tampa has the following trucking fleet available for use in the transport of hazardous waste.

- Five - 3-axle tandem tractors
- One - 2-axle tractor
- Two - 24-foot tandem axle straight trucks
- Three - 40-foot van trailers
- One - 30-foot van trailer

The maximum gross vehicle weight of the largest tractor/trailer combination at this facility is 80,000 pounds (loaded).

Access to this facility from any direction involves County Road 41 A which passes directly in front of the Tampa branch. Access to this road is from U. S. Highway 41. Interstate 4 is located 6 miles north of Road 41 A. U. S. Highway 41 is a 4 - and 6-lane major highway of concrete construction, with load-bearing capacities to withstand even the largest and heaviest vehicle combination used by this branch. The same holds true of the yard area used by vehicles within the

facility yard, which is partially paved with concrete 75 feet in front of the warehouse.

The great majority of transport will be made on company-owned and-permitted trucks based at the facility, although a customer that has a properly-permitted vehicle may occasionally make a similar delivery of spent materials.

As noted previously, the entire yard area paved with concrete is of sufficient strength to permit loaded truck traffic - an estimated compressive strength of 3000 psi. Traffic enters the main gate, proceeds east to a turnaround area and returns west to enable the truck to back into the loading dock. The location of the proposed secondary containment area is such as to isolate it effectively from moving vehicular traffic.

No significant additional traffic is expected to be generated along these routes because of hazardous waste transport activity. This is because essentially all deliveries of drums of spent solvents to the facility will be by DSW, Inc. trucks returning from their normal day's deliveries.

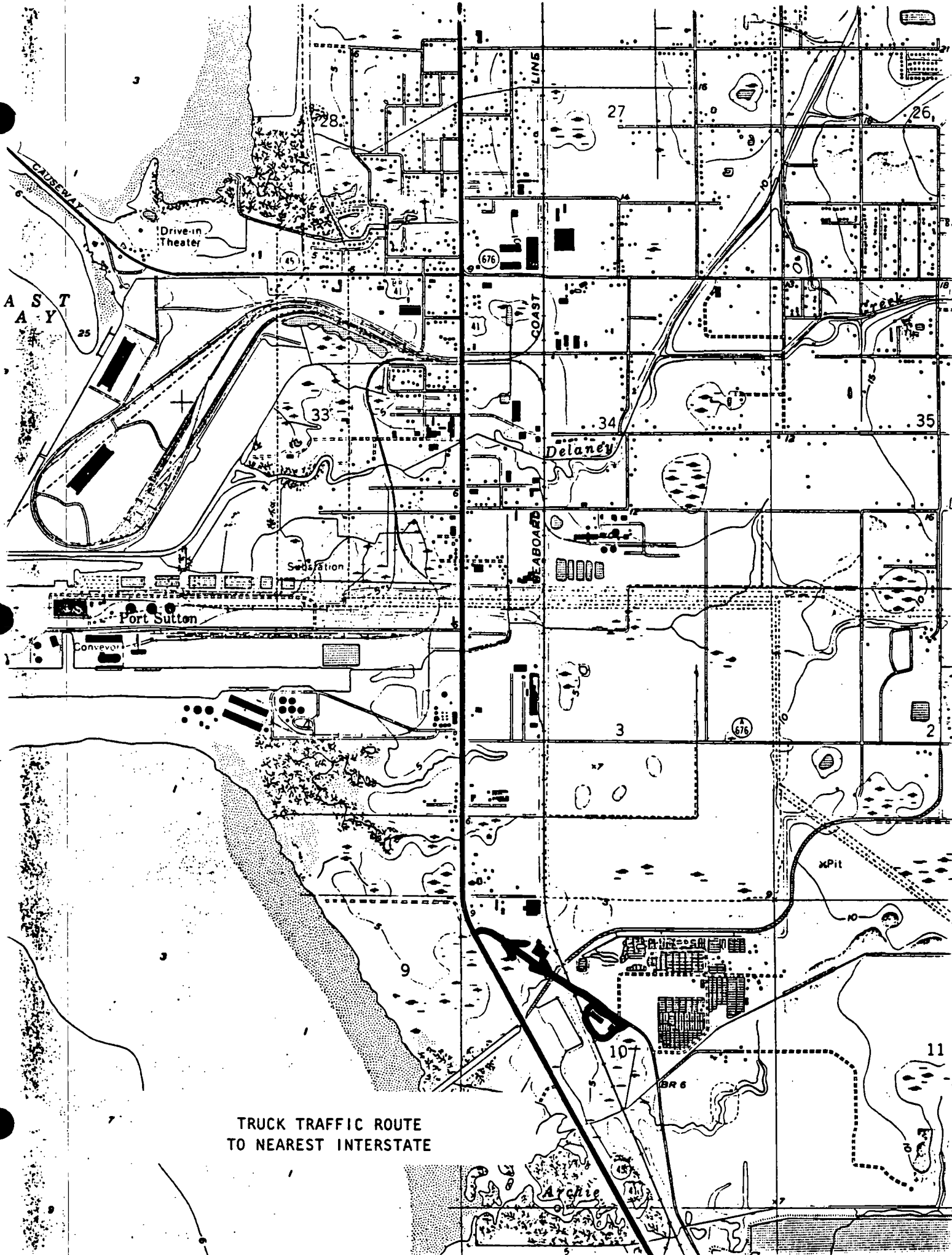
To illustrate this point, branch management estimates the following truck traffic at the branch over the course of a month (in-and-out):

| | |
|--|-----------|
| Tampa branch trucks | 396 |
| Other branch trucks and common carriers | 44 |
| Customer pickups | <u>88</u> |
| Total | 528 |

| | |
|---------------------------|----|
| Hazardous waste shipments | 16 |
|---------------------------|----|

The shipment of hazardous waste to the recycling center amounts to an increase in branch traffic of 3%.

The appended map depicts the truck route from the branch to the nearest Interstate Highway.



TRUCK TRAFFIC ROUTE
TO NEAREST INTERSTATE

RCRA COMPLIANCE-ADMINISTRATIVE

A. MANIFEST, INVENTORY CONTROL

I. Purpose

To provide control of all Federally-required forms relative to the receipt, storage, and transfer of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA).

II. Manifests

Hazardous Waste Manifests - Due to the fact that there is not a federal manifest form, the branch should use the appropriate state form if such a form is mandatory in a given state. For those states presently under a manifest system, the state form may be used provided it contains all of the following information contained in 40 CFR 262.21:

- (1) Manifest document number.
- (2) The generator's name, mailing address, telephone number, and EPA identification number (Federal in addition to state numbers).
- (3) The name and EPA identification number of each transporter.
- (4) The name, address and EPA identification number of the designated facility and an alternate facility, if any.
- (5) The description of the waste(s) (e.g. proper shipping name, etc.) required by regulations of

the U.S. Department of Transportation in
49 CFR 172.101, 172.202, and 172.203.

(6) The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.

(7) The following certification must appear on the manifest:

"This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA."

If your state is under a manifest system presently, you must use that state form and make any necessary modifications to meet the above standards. If a state form is so inadequate as to make modification inappropriate, you will be required to double manifest using the state form in addition to a complying form such as the Labelmaster F-50 form. A hazardous waste manifest must accompany all movements of hazardous waste to, from, and between DSW, Inc. locations.

III. Inventory Control

The concepts of this procedure are based on inventory management methods. An inventory subsystem for hazardous waste requiring its

own hazardous waste manifest, filing, follow-up, and retention schedule will be necessary to provide adequate control.

IV. Registration

All locations that generate, receive, store, or ship hazardous waste must be registered with the EPA. An EPA I.D. number has been issued for each location. Again, the branch must be aware of any state requirements which will require compliance.

V. Definition

Hazardous Waste Materials have been identified by the EPA in a booklet entitled "Identification and Listing of Hazardous Waste Materials" (EPA 8700-12). All branches have copies.

DSW, Inc. may become involved in the handling of hazardous waste in any of the following manners:

- Generator/Shipper - 1. Material damaged, spilled, or residual from branch operations such as repack or material movement that must be disposed of.
2. Accumulation of sludge from customers that must be shipped to a disposal site or to a recycling plant.

Transporter - Hauling hazardous waste on DSW, Inc.-owned, leased, or-rented vehicles.

TSDF - Treatment, Storage, or Disposal Facility. Whenever hazardous waste is stored or accumulated at a DSW, Inc.

location (usually for shipment to a recycling center),
the Company is acting as a storage facility.

VI. Receipt of Hazardous Waste

- A. Source - DSW, Int. customers.
- B. Reason - Recycling or disposal.
- C. Documentation - Hazardous waste must be accompanied by a hazardous waste manifest which includes the following information (See Exhibit I):
 - 1. Manifest document number.
 - 2. Shipper EPA I.D. number.
 - 3. Carrier name.
 - 4. Carrier EPA I.D. number.
 - 5. Generator/Shipper information:
 - a. EPA I.D. number.
 - b. Name, address, and phone number.
 - c. Date shipped.
 - 6. Transporter information:
 - a. Same as 5a., b., c.
 - b. Even though the Generator/Shipper also is the Transporter, this line still must be completed.
 - 7. TSDF (DSW, Int.)
 - a. Same as 5a., b., c.
 - 8. Number of units and container type.
 - 9. Identification of the waste as a hazardous material(HM)
if applicable.

10. IPA Hazardous Waste I.D. number for each item. Obtainable in the "Identification and Listing of Hazardous Wastes" (EPA 8700-12).
11. Proper shipping name and class per DOT publication 172.101. When a blended material carrying a N.O.S. shipping name is shipped, the hazardous components of the blend should be listed after the shipping name.
12. Per unit weight.
13. Total weight for each item.
14. The Generator signature and date. The manifest must be hand signed. Facsimile signatures cannot be accepted.
15. All Transporter signatures and date - no facsimile signatures. If a Generator is also the Transporter, he must sign as both.
16. TSDF signatures must be signed by DSW, Inc. receiving clerks and dated.

Except for signature requirements, all of the above must be provided by the generator.

NOTE: A DSW, Inc. driver should not pick up any sludge or other waste unless he has pick-up notice. It is extremely important for DSW, Inc. truck drivers to be aware of the necessity for a manifest to accompany H/W shipment, and how a properly prepared manifest should appear. If the above-mentioned items are not present or are not prepared properly, drivers must refuse shipment. Shipping or

receiving personnel should be aware of the same requirements in the event a customer brings sludge in on his truck to a DSW, Inc./location, and again, if any items are absent as outlined above, the shipment should be refused.

D. Receiving tickets must be issued upon receipt. In addition to the normal information required on the receiving ticket, the following must be indicated:

1. "Hazardous Waste Material".
2. The hazardous waste manifest number.
3. The receiving ticket number will be used as the lot number for future reference and will be stenciled on each drum received.

The white and yellow copies of the receiving ticket will be sent to the office with the Hazardous Waste Manifest.

E. Hazardous waste manifest routing

1. The receiving clerk will be presented with at least three copies of the Hazardous Waste Manifest. The receiving clerk will:
 - a. Verify that all required information is included on the manifest (Sec. C).
 - b. Verify that all items are received, and then initial each item on the manifest.
 - c. Enter the date received and the receiving ticket number in the identification section for the TSDF.

- d. If all items are in order, sign the manifest in the space provided for the TSDF.
 - e. Any discrepancies must be brought to the Transporter and Operations Manager's attention. If the discrepancy cannot be resolved, the load is to be refused.
 - f. Return a signed copy to the Transporter (other than DSW, Inc.).
 - g. Attach white and yellow copies of the receiving ticket to the TSDF copy.
 - h. Turn in all manifest copies and attached receiving ticket to the office at the end of each work day.
2. The inventory clerk (or other individual designated by the branch Administrative Manager) will be responsible for the following:
- a. Upon receipt of hazardous waste manifest from warehouse personnel, he must review manifest to insure proper completion including handwritten signatures and cross-referencing of receiving ticket numbers on manifests and manifest numbers on receiving tickets.
 - b. Return the original hazardous waste manifest to the generator. This must be done on a daily basis.
 - c. Detach and submit the white copy of receiving ticket to Accounting.

REVISED
SEPT. 22, 1986

- d. Maintain a "pending shipment" file for the TSDF manifest copy and attached copy of receiving ticket. This pending file will include all manifests covering sludge in stock (from customers) awaiting shipment to recycling facility.
- e. Maintain a perpetual inventory card for every type of hazardous waste material received. These cards will be maintained separately from all other inventory cards.

A separate card should be kept for each type of product waste stream.

The inventory card should show the following:

1. Date
2. Lot Number
3. Manifest number received or shipped on
4. Customer name received from or location shipped to
5. Units received or shipped
6. Balance

VII. Shipment of Hazardous Waste

Shipments of hazardous waste are to be determined by the branch Administrative Manager/assistant or designee. Under NO circumstances can a lot be split. Review of the TSDF manifest copies in the "pending shipment" file should be an integral part in determining shipments.

A. Manifest Preparation (Labelmaster F-50 or appropriate state manifest form):

1. Review Section VI-C and Exhibit I. [REDACTED] must supply the same basic information on shipments to the recycling center that customers provided on

their manifests.

2. Accumulate the TSDF manifest copies from the "pending shipment" file that will comprise the shipment.
3. Complete the manifest:
 - a. Manifest Document Number (Item 1). Most state forms will have a preprinted number sequence on the manifest form. If a form which is not prenumbered is used, the SDM number preceded by your branch location code number and the initials HWM should be used - for example, 534 HWM000. It may be desirable to designate one column of the ledger for SDM numbers, the initials HW to designate those numbers used as a manifest number, if a state form is not preprinted.
 - b. Twelve-digit EPA I.D. numbers must be obtained in advance for items 4, 6, and 7. Maintenance of an EPA I.D. number file for customers, transporters, and TSDF's will facilitate future shipments
 - c. Waste Description and Classification (Item 11) will be available directly from the TSDF manifest copies used to put the shipment together. The word "Waste" must precede the description. Immediately below the description, applicable lot numbers and the number of containers from each lot should be cross-

referenced. If more space is needed, the comment section can be used.

- d. Unit weight and total quantity should be stated in pounds.
- e. "Placards Tendered", item 17, must be completed (Shipping Department).
- f. The completed manifest must be signed by the branch manager or his appointed designee.

B. Manifest Routing

1. Remove number 4 (Generator's Copy). Attach the TSDF copy(s) from the original customers and file in another manifest file titled "pending notification". It should be noted that the copy retained may vary on different forms.
2. The remaining copies should be routed to the shipping department.
3. When shipment is made, the Transporter must sign the manifest. If via a DSW, Inc., truck, the driver must sign. Remove number 6, File Copy, and return to the office.
4. Match number 6 to number 4 copy in the "pending notification" file. This file should be set up as a "tickler" file which insures follow-up in 35 days if the number 1, Original, is not returned from the TSDF.

THIS IS THE LAW -- INITIAL FOLLOW-UP MUST BE MADE AT 35 DAYS. EPA NOTIFICATION MUST BE MADE AT 45 DAYS.

REVISED
SEPT. 22, 1986

5. When the hand-signed number 1, Original, is returned, it should be matched to the number 4, Generator Copy and receiving tickets. The "cycle" is now completed; the manifest can be closed and filed (separately from all other records).

VIII. EPA Notification

If the Original, number 1, copy of the hazardous waste manifest is not received in 45 days, the Regional Office of the USEPA must be notified. A list of Regional Offices is shown in Exhibit II. Such notification requires:

- A. A legible copy of the Hazardous Waste Manifest covering the shipment that is missing.
- B. A detailed letter explaining DSW, Inc efforts to locate the material and to obtain the signed manifest.
- C. Notification should be by registered mail.

NOTE: A copy of the notification should be submitted also to the Regional Operations Department.

IX. Hazardous Waste Manifest Control Ledger

Every Hazardous Waste shipment must be assigned a SDM number and have this form accompany the shipment and be recorded in the Control Ledger. The ledger will show the date shipped, the manifest document number, ship to, and the date confirmation manifest received, number 1 copy.

X. Manifest Discrepancies

Upon discovering a major discrepancy between the quantity or type of

hazardous waste designated on a hazardous waste manifest and the quantity or type of hazardous waste actually received, the branch must attempt to reconcile the waste discrepancy with the waste generator or transporter. If the discrepancy is not resolved within fifteen days after receipt of the waste, the branch must immediately submit to the USEPA Regional Administrator a letter describing the discrepancy and the attempts to reconcile it, together with a copy of the manifest at issue.

B. OPERATING RECORD

I. Purpose

To provide for the orderly collecting of information required for the Operating Record and its organization and recording.

II. Content

The following information will be recorded as it becomes available and will be maintained in the branch's Operating Record until the storage facility is closed.

- (1) A description and quantity of each hazardous waste received at the branch, where it is stored, and the dates of its receipt and removal. This includes cross-referencing to the number of specific manifest document involved.
- (2) Records and results of waste analyses performed as required by the facility permit.
- (3) Summary reports and details of all incidents that require implementation of the Contingency Plan.
- (4) Records and results of inspections carried out in conformance with the facility's Inspection Schedule.
- (5) Copies of the notices to generators that the DSW, Inc. branches has the appropriate permits for, and will accept, the waste the generator is shipping to the DSW, Inc. branch.
- (6) The most recent closure cost estimate.

III. Retention Schedule

All records, manifest, and reports must be held for three (3) years.

REVISED
SEPT. 22, 1986

C. REPORTING

I. Purpose

To ensure all required information is filed with appropriate regulatory agencies.

II. Biennial Report - Federal

A single copy of a biennial report must be filed with the USEPA Regional Administrator by March 1 of each even-numbered year; it must be submitted on EPA form 8700-13B. It must include the following information for the previous calendar years:

1. The EPA identification number, name, and address of the facility.
2. The calendar years covered by the report.
3. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the reporting period.
4. A description and the quantity of each hazardous waste the facility received during the reporting period. The information must be listed by EPA identification number of each generator.
5. The method of storage (or disposal) for each hazardous waste.
6. The most recent closure cost estimate for the facility.
7. A certification signed by the operator of the facility.

HAZARDOUS WASTE MANIFEST

ORIGINAL - NOT NEGOTIABLE

EXHIBIT 1

MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CARRIER NUMBER

NAME OF CARRIER

(SCAC)

IDENTIFICATION

12 DIGIT EPA ID #

COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER

DATE SH
OR REC'DGENERATOR
SHIPPER

TRANSPORTER #

TRANSPORTER # 2
(if required)TSDT TREATMENT
STORAGE OR DIS-
POSAL FACILITYTSDT TREATMENT
STORAGE OR DIS-
POSAL FACILITY

WASTE INFORMATION

| NO. OF UNITS & CONTAINER TYPE | HM | EPA HAZ. WASTE ID # | DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203) | UN # or NA # | EXEMPTION OR NO LABELS REQUIRED | FLASH POINT (IN °C) WHEN REQ'D | UNITS WT/VOL | TOTAL QUANTITY | RATE | CF (For UI) |
|-------------------------------------|----|------------------------------|--|--------------------|---------------------------------------|--------------------------------------|-----------------|-------------------|------|-------------------|
| 8 | 9 | 10 | 11 | | | | 12 | 13 | | |

SPECIAL HANDLING INSTRUCTIONS

If an RC commodity is spilled on a waterway or adjoining land, the spill must be promptly reported to the Federal government at 1-800-424-8800 (free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are disclosed creating a serious situation, call shipper's telephone number or CH 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

17 PLACARDS TENDED
Yes ☐ No ☐REMIT
C.O.D. TO:
ADDRESS

COD

Amt: \$

C.O.D. FEE:
PREPAID ☐
COLLECT ☐ \$

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding:

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is 'carrier's or shipper's weight.'"

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

TOTAL
CHARGES: \$

FREIGHT CHARGES

FREIGHT PREPAID
Receipt when box is
right is checked ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or

any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

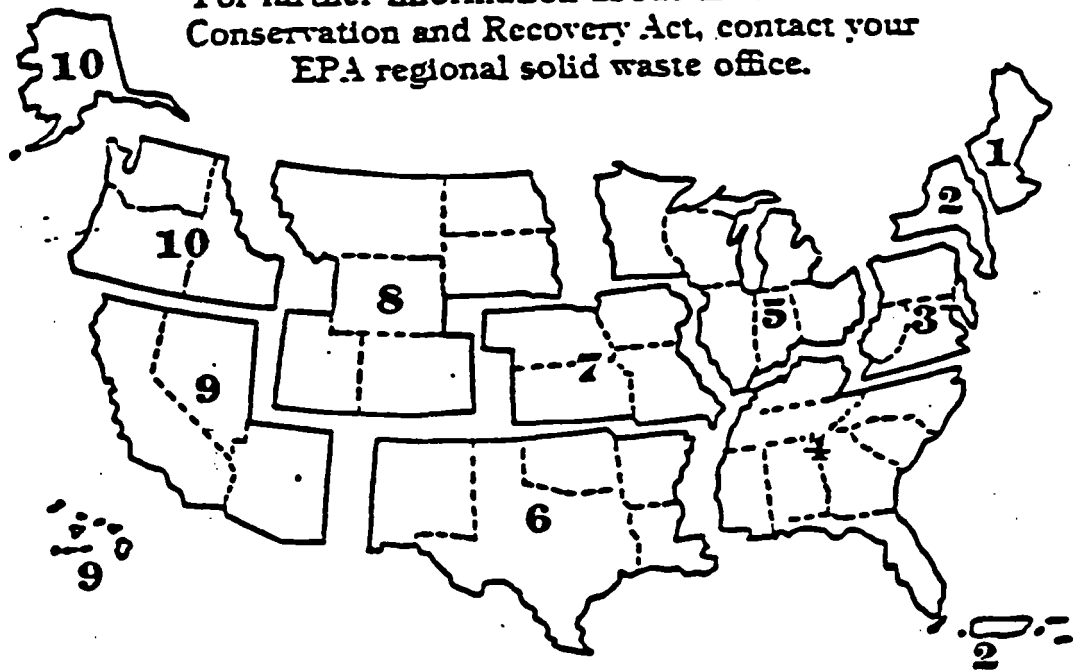
GENERATOR'S SIGNATURE

DATE

TSDT SIGNATURE

DATE

For further information about the Resource Conservation and Recovery Act, contact your EPA regional solid waste office.

**Region 1**

Solid Waste Program
John F. Kennedy Building
Boston, MA 02203
617-223-5777

Region 2

Solid Waste Section
26 Federal Plaza
New York, NY 10007
212-264-0503/4/5

Region 3

Solid Waste Program
6th and Walnut Streets
Philadelphia, PA 19106
215-597-0980

Region 4

Solid Waste Section
345 Courtland Street, N.E.
Atlanta, GA 30365
404-881-3016

Region 5

Solid Waste Program
230 South Dearborn Street
Chicago, IL 60604
312-886-6148

Region 6

Solid Waste Section
1201 Elm Street
First International Building
Dallas, TX 75270
214-767-2645

Region 7

Waste Management Section
324 East 11th Street
Kansas City, MO 64106
816-374-3307

Region 8

Solid Waste Section
1860 Lincoln Street
Denver, CO 80203
303-837-2221

Region 9

Solid Waste Program
215 Fremont Street
San Francisco, CA 94105
415-556-4606

Region 10

Solid Waste Program
1200 6th Avenue
Seattle, WA 98101
206-442-1260

SECURITY

E. FACILITY SECURITY INFORMATION

SECURITY PROCEDURES

CONTINGENCY PLAN

PROCEDURES, STRUCTURES, EQUIPMENT

PREPAREDNESS AND PREVENTION

TRAINING PROGRAM

DSW, Inc.

Security

This DSW, Inc. facility employs a number of measures designed to assure adequate security in order to comply with government regulations and to ensure the protection of company assets.

This facility does not utilize a 24-hour entry surveillance system, but does have other means of control to provide adequate security. A manual fire alarm system is present at this facility. A security guard is also employed for nighttime hours and patrols the yard area of the complex.

A fence surrounds the perimeter of the branch. It is constructed of a 6-foot high, chain link with a 2-inch mesh. Above the chain link, supported on the top of the steep upright posts, are arms projecting 1 foot at a 45 degree angle from vertical, holding 3 strands of barbed wire strung around the entire fence.

Access of the areas of the branch which are surrounded by the fence will be by one of two gates. Vehicular traffic carrying hazardous wastes will reach the unloading/loading dock area by way of a 24-foot double gate in the north stretch of fence. There is also a double gate on the west side of the facility for access of the railroad to spot tankcars. This gate is locked and controlled by the Seaboard Coastline Railroad, and is unlocked and open only when being used.

The branch's security guard monitors the railroad's activities after hours. Both gates are of the same construction as the fencing in which they are positioned.

The above - mentioned gates are maintained in a closed and padlocked condition during all periods of facility non-working hours. During working hours, the fence gates are observed at all times from either the general office or the working area and Operations Manager's office. All visitors must gain access to the facility by way of the main office located on the west side of the facility. A secured and attended vestibule lies immediately inside the entrance door at which point a receptionist inquires as to a visitor's identification and purpose of visit. It is DSW, Inc. policy that no one shall be allowed to gain access to any part of the immediate facility without being accompanied by a [REDACTED] employee. Any visits and/or inspections pertinent to the functioning of the branch as a hazardous waste management facility are to be logged in the facility's operation log.

All doors as well as the gates which were previously described are maintained in a locked and secured condition during non-working hours.

Warning signs are posted at all gates and several other fence locations around the facility in such a manner to be visible from all angles of

approach, and shall bear the legend "Danger - Unauthorized Personnel Keep Out". There are also "No Smoking" signs posted in prominent positions in the yard and loading areas, as well as other precautionary and safety signs, to ensure that no ignition sources are present in these areas. The restriction of smoking only in designated areas is again a standard DSW, Inc. working rule.

No materials, empty pallets, or drums are permitted to be stacked against the fence in order to prevent easy access or concealment.

All critical locks are changed whenever a key holder leaves the company, when a key is lost, or every two years, whichever comes first.

All available lighting will be utilized to illuminate the buildings, fence, and yard. Manual timers are installed to control lighting on buildings; photo electric timers are on light poles.

CONTINGENCY PLAN

Operator

DSW, Inc.

6051 Highway 41A, South

Tampa, Florida 33619

(813)677-8414

REVISED
SEPT. 22, 1986

1. INTRODUCTION

This DSW, Inc. branch is a distributor of chemicals and industrial solvents. It carries out no manufacturing or processing. It may repack certain solvents - filling 55-gallon metal drums from either a stationary storage tank or from a tank truck or rail car. Its hazardous waste activities consist of picking up small numbers of drums of spent solvents from its customers and storing them until an economic truckload is accumulated - at which time they are transported to a recycling facility.

A copy of the branch's emergency response blueprint follows.

REVISED
SEPT. 22, 1986

II. THE CONTINGENCY PLAN

This Contingency Plan is intended to provide information and to assign responsibilities to enable branch personnel to undertake actions that will minimize any threat to the branch employees, residential and business neighbors, company and adjoining property, and to the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste, hazardous waste constituents or hazardous materials to air, soil, or surface water.

The provisions of the Plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste, hazardous waste constituents, or hazardous materials which could threaten human health or the environment.

The data are organized so that changes in personnel, procedures, and regulations can be easily incorporated into the Plan as they occur, insuring that all information is up-to-date. The Plan will be reviewed and amended, if necessary, whenever

1. The facility hazardous waste permit is revised;
2. The Plan fails in an emergency;
3. The DSW, Inc. branch changes - in its design, construction, operation, maintenance, or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste, hazardous waste constituents, or hazardous materials or changes the response necessary in an emergency;

REVISED
SEPT. 22, 1986.

II. CONTINGENCY PLAN (CONT'D)

4. The list of emergency coordinators changes; or
5. The list of emergency equipment changes.

A copy of the Contingency Plan is maintained at the branch. The responsibility for keeping it up-to-date rests with the Branch Manager. Copies are submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

The provisions of the Plan will be implemented immediately in the event of a fire, explosion or related release of hazardous materials or hazardous wastes in the branch. In addition, the branch manager will have the authority to put the emergency procedure into action in the event he believes such a condition is imminent, even though it is not occurring. Situations requiring implementation of the Contingency Plan/emergency response procedures are:

1. An explosion taking place at the branch.
2. There is a major fire at the branch.
3. There is an accidental rupture, a major release, discharge or spill of hazardous waste or hazardous/toxic material which may:
 - a. Create a fire or explosion hazard.
 - b. Release health harmful vapors.
 - c. Create the potential for soil, air or water contamination.

(II. THE EMERGENCY COORDINATOR

Responsibility for responding to emergencies and implementing contingency procedures as required rests in the Emergency Coordinator. The list of names on the following page identifies the primary Emergency Coordinator and his alternates at the branch. If the primary Emergency Coordinator is not available, the alternate will be contacted.

The primary Emergency Coordinator and alternate have the authority to commit resources of the Company in the event of an emergency. One or the other will either be on the facility premises or on call at all times with the responsibility for coordinating all emergency response measures. The Emergency Coordinator is thoroughly familiar with all aspects of the facility's Contingency Plan, all operations and activities at the facility, the location and characteristic of hazardous waste and hazardous materials handled, the location of all records within the facility, and the facility layout.

EMERGENCY COORDINATORS

DSW, Inc.

TAMPA, FLORIDA BRANCH

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

REVISED
SEPT. 22, 1986

IV. GENERAL EMERGENCY PROCEDURES

1. Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or his alternate when the Emergency Coordinator is on call) will immediately:
 - (i) Activate internal facility alarms and communication systems, to notify all facility personnel; and
 - (ii) Notify appropriate State or local agencies with designated response roles if their help is needed.
2. Whenever there is a release, fire or explosion, the Emergency Coordinator will immediately identify the character, exact source, amount, and extent of any released materials. He does this by observation or review of facility records or manifests, and, if necessary, by chemical analysis.
3. Concurrently, the Emergency Coordinator will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water of chemical agents used to control fire and heat-induced explosions).
4. If the Emergency Coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he will report his findings as follows:

IV. GENERAL EMERGENCY PROCEDURES (CONT'D)

- (i) If his assessment indicates that evacuation of local areas may be advisable, he will immediately notify appropriate local authorities. He will be available to help appropriate officials decide whether local areas should be evacuated; and
- (ii) He must immediately notify the appropriate State Emergency Agency*. The report will include:
 - (I) Name and telephone number of reporter;
 - (II) Name and address of facility;
 - (III) Time and type of incident (e.g., release, fire);
 - (IV) Name and quantity of material(s) involved, to the extent known;
 - (V) The extent of injuries, if any; and
 - (VI) The possible hazards to human health, or the environment, outside the facility.
- 5. During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste or hazardous waste materials at the Branch. These measures will include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.
- 6. If the branch stops operations in response to a fire, explosion, or release, the Emergency Coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes,

* In Florida, the state DER office within the affected District (see following map).

IV. GENERAL PROCEDURES (CONT'D)

6. (Cont'd)

or other equipment, wherever this is appropriate.

7. Immediately after an emergency, the Emergency Coordinator will 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, and treat such material as hazardous waste.

8. The Emergency Coordinator will ensure that, in the affected area(s) of the branch:

- (i) No waste or hazardous material that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
- (ii) All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed.

9. The owner or operator must notify the appropriate State authority* and the Regional Administrator of the USEPA and the appropriate local authorities that the facility is in compliance with part 8 of this subparagraph before operations are resumed in the affected area(s) of the branch.

10. 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, he must submit a written report on the incident to the appropriate State authority* and the Regional Administration of the

* In Florida, the state DER office within the affected District (see following map).

NORTHWEST DIST.

Robert V. Kriegel, Dist. Man.
160 Governmental Center
Pensacola, FL 32501
904-436-8300
(Suncom 695-8300)

NORTHWEST DIST. BRANCH OFFICE

217 E. 23rd St.
Suite B
Panama City, FL 32405
904-769-3576
(Suncom 221-3350)

NORTHWEST DIST. BRANCH OFFICE

Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FL 32301
904-488-3704
(Suncom 278-3704)

NORTHEAST DIST.

G. Doug Dutton, Dist. Man.
3426 Bills Rd.
Jacksonville, FL 32207
904-396-6959
(Suncom 820-8296)

NORTHEAST DIST. BRANCH OFFICE

825 N.W. 23rd Ave., Suite G
Gainesville, FL 32601
904-377-7628
(Suncom 620-8150)

ST. JOHNS RIVER DIST.

Alex Senkevich, Dist. Man.
3319 Maguire Blvd., Suite 232
Orlando, FL 32803
305-423-6380
(Suncom 393-1011)

SOUTHWEST DIST.

William K. Hennessey, Dist. Man.
7601 Highway 301 N.
Tampa, FL 33610
813-985-7402
(Suncom 552-7270)

SOUTH FLORIDA DIST. BRANCH OFFICE

3201 Golf Course Blvd.
Punta Gorda, FL 33950
813-639-4967
(Suncom 552-7636)

SOUTH FLORIDA DIST.

Philip R. Edwards, Dist. Man.
2269 Bay St.
Fort Myers, FL 33901
813-332-2667
(Suncom 552-7900)

SOUTH FLORIDA DIST. BRANCH OFFICE

11400 Overseas Highway
Suites 219-224
Marathon, FL 33050
305-743-6955/8261

SOUTHEAST FLORIDA SUBDIST.

Al Mueller, Subdist. Man.
2745 S.E. Morningside Blvd.
Port St. Lucie, FL 33452
305-878-3890
(Suncom 451-5053)

SOUTHEAST FLORIDA DIST.

Roy Duke, Dist. Man.
3301 Gun Club Rd.
P.O. Box 3858
W. Palm Beach, FL 33402
305-689-5800
(Suncom 451-5005)

DISTRICT SUBDISTRICT

&

BRANCH OFFICES

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

904-488-4805

IV. GENERAL PROCEDURES (CONT'D)

10. (cont'd)

USEPA. The report must include:

- (i) Name, address, and telephone number of the owner or operator;
- (ii) Name, address, and telephone number of the facility;
- (iii) Date, time, and type of incident (e.g., fire, explosion);
- (iv) Name and quantity of material(s) involved;
- (v) The extent of injuries, if any;
- (vi) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

V. SPECIFIC EMERGENCY PROCEDURES

Fire

Facility personnel have received fire protection training and will be the initial action group in the event of a fire. They will:

1. Sound the fire alarm.
2. Use the nearest fire extinguisher and attempt to put out the fire: ONLY IF SMALL AND HANDLEABLE.
3. Inform the Emergency Coordinator.

The Emergency Coordinator will:

1. Account for all personnel.
2. Assess information and determine the next step:
 - a. Call local fire department.
 - b. Secure plant activities.
 - c. Establish fire containment operation.
 - d. Arrange for needed medical attention.
 - e. Begin relocating any threatened chemicals or loaded equipment that might add to fire.

Upon arrival of the local fire department, the Emergency Coordinator's posture shifts to a support position and provides technical information or other assistance requested by fire department personnel.

When the fire department sounds an "all-clear" signal:

1. Clean-up activity begins.
2. Extent of damage is determined and reports prepared.
3. All emergency equipment used is inspected and cleaned.
4. All fire-fighting supplies consumed are resupplied.

V. SPECIFIC EMERGENCY PROCEDURES (CONT'D)

Spills

Because this facility deals with only containerized spent solvents as hazardous wastes, the amount of material potentially released from one container is small. Whether a spill from one drum or the 10% of the total permitted inventory is involved, there will be required an initial evaluation by the Emergency Coordinator of the magnitude and scope of the release including type of material released and rate of release, any injuries involved, direction in which the material or any vapors is heading, extent of damage to equipment or structures and whether or not material is contained within existing dikes.

If the material release involves an ignitable substance, hazards of fire and vapor emission are increased. The Emergency Coordinator will evaluate the situation for a determination on whether or not to discontinue any welding, cutting or grinding operation or to disconnect electrical services to the area.

The Emergency Coordinator's assessment of the incident will include a decision on whether or not the accident can be contained by the facility emergency response team. If the incident is within the plant's capability, the Emergency Coordinator will contact and deploy plant personnel.

If additional emergency response/spill control assistance is needed, the Emergency Coordinator will call in outside units. One or more contractors specializing in emergency response/spill control/spill

V. SPECIFIC EMERGENCY PROCEDURES (CONT'D)

clean up work are listed under "Emergency Telephone Numbers".

The initial response to the emergency, whether performed by plant personnel, by spill contractors units or by a combination of the two, will be to protect health and safety and to minimize the environmental impact. Spill control and clean up equipment are available on site. Locations of spill control equipment are designated on the emergency response blueprint.

EMERGENCY TELEPHONE NUMBER

A. EMERGENCY RESPONSE AGENCIES AND ORGANIZATIONS

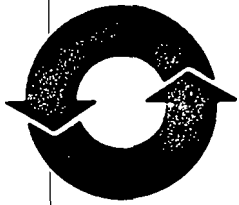
| | |
|--|--------------|
| Florida Bureau of Disaster Preparedness | 904/488-1320 |
| Florida Department of Environmental Regulation | 904/488-1900 |
| | 904/488-0300 |
| Tampa Police Department | 813/247-6411 |
| Tampa Fire Department | 813/223-5544 |
| Brandon Community Hospital | 813/681-5551 |
| Ambulance | 813/681-4422 |
| U. S. Coast Guard | 202/426-2675 |
| CHEMTREC | 800/424-9300 |

B. NEIGHBOR

| | |
|------------------------------|--------------|
| Mineral Aggregates Co., Inc. | 813/677-9168 |
|------------------------------|--------------|

C. OUTSIDE CONTRACTORS

| | |
|---|--------------|
| Resource Recovery of America, Inc. Mulberry, Florida | 813/425-1084 |
| International Solvent Recovery, Inc. Barton, Florida | 813/533-8143 |
| Chemical Waste Management, Inc. Pompano Beach, Florida | 404/952-0444 |



**RESOURCE
RECOVERY
OF AMERICA, INC.**

July 10, 1984

Mr. Donald Black
MCKESSON CHEMICAL COMPANY
136 Summit Avenue
Montvale, New Jersey 07645

Dear Mr. Black:

Thank you for your interest in our company. We would appreciate the opportunity to work for you and the McKesson group on your hazardous waste compliance requirements.

As I explained, we can provide you with back-up transportation, spill clean-up, disposal, recycling, a waste exchange program or tank cleaning services.

Our costs will vary depending on the job but will basically be around \$100.00 plus or minus per 55 gallon; including transportation and disposal. Non-hazardous wastes will be less.

Please find enclosed copies of our permits and a letter from the Florida Department of Environmental Regulations stating our compliance to the current regulations.

Should you have any questions or require additional information please contact us at (813) 425-1084.

Again, thank you. It would be our privilege to work with you.

Sincerely,

Robert O. Kincart
RESOURCE RECOVERY OF AMERICA, INC.

ROK/ljh

South Carolina Department of Health and Environmental Control

2600 Bull Street
Columbia, S.C. 29201

Commissioner
Robert S. Jackson, M.D.



Board
Moses H. Clarkson, Jr., Chairman
Leonard W. Douglas, M.D., Vice-Chairman
Barbara P. Nussle, Secretary
Gerald A. Kaynard
Oren L. Brady, Jr.
James A. Spruill, Jr.
William H. Hester, M.D.

OFFICE OF ENVIRONMENTAL QUALITY CONTROL BUREAU OF SOLID & HAZARDOUS WASTE MANAGEMENT

Hazardous Waste Transporter Permit

Date of Issue: February 29, 1984 Expiration Date: March 1, 1987

Permit Number: 980602734 T

Permission is hereby granted to:

Name of transporter: Resource Recovery of America, Inc.
Address: 2300 Highway 60 West
Milberry, FL 33860
Supervisor: Robert O. Kincart
Phone: (813) 425-1084

for the operation as a transporter of hazardous waste located in Mulberry, FL.

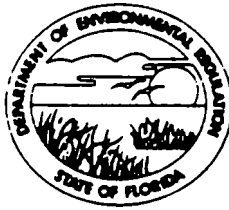
This permit is issued pursuant to Section 44-56-10 et seq. of the 1976 South Carolina Code of Laws, as amended, and South Carolina Rule(s) and Regulation(s) 61.79. The authority granted hereunder is subject to the requirements of the aforementioned laws and regulations and the following conditions:

(See attached list of conditions)

Hartsill W. Truesdale
Hartsill W. Truesdale, P.E. Director
Division of Facility Engineering
Bureau of Solid & Hazardous Waste
Management

This permit is non-transferable and is the property of the Bureau of Solid and Hazardous Waste Management and must be surrendered on demand. Keep posted at all times in a conspicuous place on the premises.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610-9644

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

WILLIAM K. HENNESSEY
DISTRICT MANAGER

June 21, 1983

Mr. Robert O. Kincart
Resource Recovery of America, Inc.
2300 Highway 60, West
Mulberry, Florida 33860

Dear Mr. Kincart:

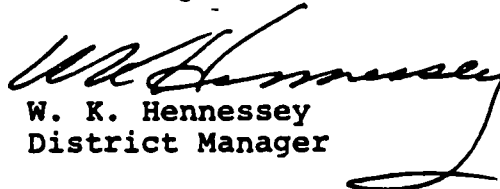
This letter is to recap our meeting of June 15, 1983. At that time you expressed a concern as to how this agency was handling the permitting of waste oil dealers.

Resource Recovery of America, Inc., has recently constructed the Mulberry facility with full environmental permitting from this agency. The site was reviewed for compliance with industrial waste, hazardous waste, and stormwater regulations. Being the newest, this facility is the first in this district to submit to this type review and permitting.

This Department fully intends to address the pre-existing waste oil facilities to bring them into compliance with the same standards and rules.

The efforts of your firm are appreciated, and we are grateful for the interest you have shown for protection of the environment.

Sincerely,


W. K. Hennessey
District Manager

WKH/jdj

STATE OF FLORIDA
DEPARTMENT OF REVENUE
DEALER'S LICENSE
Special Fuels

Nº 10760

This license must be displayed in open view
at all times at the DEALER'S office or
principal place of business.

Tallahassee, Florida, May 1, 19 83

Having furnished application and surety bond and paying the required fee as provided by the
provisions of Chapter 206, Florida Statutes,

Resource Recovery of America, Inc.

whose office or principal place of business is Mulberry, FL

is hereby issued this license as a Dealer in Special Fuels, in the State of Florida. This license is
NOT TRANSFERABLE but will continue in full force and effect until cancelled or revoked as
provided by law.

DEPARTMENT OF REVENUE

This license must be returned to the Department of Revenue
when the licensee terminates his operation as a Dealer.


Executive Director



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for
the installation located at the address shown in the box below to comply with Section 3010
of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number
for that installation appears in the box below. The EPA Identification Number must be in-
cluded on all shipping manifests for transporting hazardous wastes; on all Annual Reports
that generators of hazardous waste, and owners and operators of hazardous waste treatment,
storage and disposal facilities must file with EPA; on all applications for a Federal Hazard-
ous Waste Permit; and other hazardous waste management reports and documents required
under Subtitle C of RCRA.

EPA I.D. NUMBER

FLD980602734

RESOURCE RECOVERY OF AMERICA INC
100 14TH AVE SOUTH
ST PETERSBURG

FL 33701

INSTALLATION ADDRESS

2300 HWY 60 WEST
MULBERRY

FL 33600

McKesson

In accordance with 40CFR Sections 264.37, 264.53, 265.37 and 265.53, the RCRA Act of 1980, this letter of transmittal to:

HUMANANA HOSPITAL - BRANFORD
ORGANIZATION

J.P. Kell Area Mgr. O.C.
PERSON/POSITION

11/21/84
DATE

indicates receipt of the facility Contingency/Employee Emergency Response Plan by your agency which is designated as the (primary) ~~(alternate)~~ source for emergency ~~(fire)~~ ~~(police)~~ (medical) assistance for our facility.

Our facility routinely handles regulated hazardous chemicals in bulk and packaged form, as well as stores drummed hazardous waste materials. The Facility Contingency/Employee Emergency Response Plan contains:

- 1) the location and schematic layouts of our facility to include the location of all regulated hazardous chemical and hazardous waste material storage
- 2) a listing of our key employees and their residence phone numbers who are authorized to act in behalf of the company as primary and alternate emergency coordinators
- 3) other schematic layouts showing the normal working places of our employees, the identification and location of our major items of emergency equipment, our mechanical and electrical service controls, as well as entrances/exits and possible evacuation routes.
- 4) Further, technical information and manufacturers' material safety data sheets are included for all major regulated hazardous chemicals and hazardous waste materials normally in storage. These describe the properties of those materials, their effect on human life and the environment, as well as the recommended fire-fighting techniques and emergency medical treatment required in an actual emergency.

It is our legal responsibility to continue to keep you informed of any revisions to this plan.

J.P. Kell
Branch Operations Manager



Serving the Nation
Since 1833

McKesson

In accordance with 40CFR Sections 264.37, 264.53, 265.37 and 265.53, the RCRA Act of 1980, this letter of transmittal to:

HILLSBOROUGH CO.

FIRE DEPT.

ORGANIZATION

Capt. P. J. Karbon

PERSON POSITION

12/6/84

DATE

indicates receipt of the facility Contingency/Employee Emergency Response Plan by your agency which is designated as the (primary) ~~(alternate)~~ source for emergency (fire) ~~(police)~~ ~~(medical)~~ assistance for our facility.

Our facility routinely handles regulated hazardous chemicals in bulk and packaged form, as well as stores drummed hazardous waste materials. The Facility Contingency/Employee Emergency Response Plan contains:

- 1) the location and schematic layouts of our facility to include the location of all regulated hazardous chemical and hazardous waste material storage
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It is our legal responsibility to continue to keep you informed of any revisions to this plan.


Branch Operations Manager



Serving the Nation
Since 1833

McKesson

In accordance with 40CFR Sections 264.37, 264.53, 265.37 and 265.53, the RCRA Act of 1980, this letter of transmittal to:

HILLSBOROUGH COUNTY
SHERIFF'S OFFICE

ORGANIZATION

LT. TED GIBSON

PERSON/POSITION

5 DEC 84

DATE

indicates receipt of the facility Contingency/Employee Emergency Response Plan by your agency which is designated as the (primary) ~~(alternate)~~ source for emergency ~~(fire)~~ (police) ~~(medical)~~ assistance for our facility.

Our facility routinely handles regulated hazardous chemicals in bulk and packaged form, as well as stores drummed hazardous waste materials. The Facility Contingency/Employee Emergency Response Plan contains:

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- 2) a listing of our key employees and their residence phone numbers who are authorized to act in behalf of the company as primary and alternate emergency coordinators
- 3) other schematic layouts showing the normal working places of our employees, the identification and location of our major items of emergency equipment, our mechanical and electrical service controls, as well as entrances/exits and possible evacuation routes.
- 4) Further, technical information and manufacturers' material safety data sheets are included for all major regulated hazardous chemicals and hazardous waste materials normally in storage. These describe the properties of those materials, their effect on human life and the environment, as well as the recommended fire-fighting techniques and emergency medical treatment required in an actual emergency.

It is our legal responsibility to continue to keep you informed of any revisions to this plan.


Branch Operations Manager



Serving the Nation
Since 1833

V. SPECIFIC EMERGENCY PROCEDURES (CONT'D)

Clean-up

Any portable equipment that has become contaminated by use during an emergency will be placed in a metal drum and steam-cleaned. All condensate will be collected and treated as a hazardous waste. Any larger equipment (e.g., a forklift blade) will be similarly cleaned inside the secondary containment area and the condensate collected.

Any contaminated absorbent material or chemical used in clean-up will be collected in an appropriate container and treated as a hazardous waste.

VI. EVACUATION PROCEDURES

A fire at the branch or a major spill or overflow of hazardous waste or hazardous material from its storage area will implement the branch's evacuation plan. It is the responsibility of the Emergency Coordinator to determine whether its severity of the incident warrants evacuation of the branch's personnel. The decision for evacuation of the nearby industries off property will be made by the responsible local or state police or fire organizations.

Personnel are trained to assemble at a specific location on the branch property after receiving an emergency alarm signal. Plant personnel will bring along to the assembly area any suppliers, contractors, or visitors in their areas. Evacuation routes from various branch work areas are shown on the emergency response blueprint.

Specific evacuation steps are:

1. The Emergency Coordinator will announce plant evacuation by voice alarm or the internal telephone system.
2. One person from the office will be dispatched to the main entrance gate. The gate will be set in the full open position. No entry will be allowed by visitors, truckers, contractors or suppliers.
3. Personnel will assemble at their assigned area. The Emergency Coordinator will check off to account for all personnel, including visitors. Visitors will be sent off site immediately after completion of the head count check.
4. Missing person situations will be evaluated by the Emergency Coordinator and other personnel who were working

VI. EVACUATION PROCEDURES (CONT'D)

4. (cont'd)

in the area or in an adjacent area. Telephone contact will be attempted in the event the initial signal was not heard. Re-entry into an emergency area to search for missing persons is allowed only if the search would not endanger lives

VII EMERGENCY EQUIPMENT

There are two types of emergency equipment at this DSW, Inc. branch,

A. That which is "built-in" to the branch:

Safety shower

Nearest located on other side of fire wall; tied into county water pressure.

Fire hydrant

Located across Route 41A at west end of property.

Alarm system

(a) manual fire alarm, station located inside warehouse on north wall; (b) three alarm horns in ceiling of warehouse, sounding warning blasts activated by button on telephone.

Communication system

Conventional telephone with connected alarm system as previously noted.

Fire hoses

Two in warehouse proper; locations noted on emergency response blueprint.

B. That which is portable:

Fire extinguishers

Seven in warehouse building, locations as noted in emergency response blueprint; 20 lb. BC capacity.

REVISED
SEPT. 22, 1986

VII. EMERGENCY EQUIPMENT (CONT'D)

B. That which is portable (cont'd)

First Aid Kits

Two Zee kits within reach of storage area - one in adjacent repack room and one in Operation Manager's office.

Emergency pallets

On "A" pallet:

1. Rubber suits - 2
2. Rubber boots - 2 pairs
3. Rubber gloves - 2 pairs
4. Soda ash - 10/100 lb. bags, to neutralize acidic materials
5. Citric acid - 5/100 lb. bags, to neutralize alkaline materials
6. Inert absorbent material - 10/50 lb. bags, to absorb spilled liquids
7. Shovels - 2
8. Brooms - 2
9. Flashlights - 2
10. Rakes - 2
11. Pick axe - 1

On "B" pallet:

1. Scott Air Pak, self-contained breathing apparatus, 30-minutes
2. Recovery drums - 2/80 gal. capacity

DSW, Inc.

Procedures, Structures, Equipment

The hazardous waste management activities undertaken at this facility of DSW, Inc., is that only of temporary storage of drummed solvents which are defined as hazardous wastes. There is but one location at the facility which is utilized for loading and unloading of materials received from off-site generators. The loading/unloading area is designated on the facility diagram.

This facility receives less than truckload quantities of waste materials from off-site generators and temporarily stores them in order to accumulate economical truckloads of these materials to warrant the distances involved in reaching the recycling centers to which these waste materials are ultimately destined.

The amount of handling of the drummed materials while at the facility is kept to an absolute minimum to minimize the likelihood of damage and possible release. Once trucks carrying waste materials are at the dock area and secured by means of wheel chocks, forklifts are utilized to transfer the drums from the truck onto wooden pallets in the staging area at the loading and unloading area. Drums are placed four to a pallet, and once the necessary administrative procedures and verification counts have been made as outlined under "Containment Management Practices", full pallets are carried by forklift to the designated storage area where they remain on the pallet. While in storage, the drums are inspected in accordance with the inspection schedule listed in Table 1. Sufficient spacing around each pallet of drums is maintained to ensure the avoidance of damaging drums while placing pallets adjacent to another.

* Of the Inspection Schedule.

REVISED
SEPT. 22, 1986

Once an economic truckload quantity of material is accumulated, the full pallets of drums are brought to the staging area at the dock, prepared for shipment, and placed onto the vehicle transporting them to the recycling center. Because of the minimal handling during the materials presence at the facility site, the likelihood of spills is minimal, but should an incident occur, spilled material would be contained and picked up by use of Hazorb or other industrial absorbents which are readily available at the site. Any contaminated material shall be picked up and placed in an open-head drum compatible with the material, and sent to a properly permitted disposal facility.

Ground water contamination is prevented at this facility by assuring that all containers of waste materials are stored in a closed, good quality drum, and remain at all times in the designated hazardous waste storage area which has the secondary containment system protection described in detail in the section entitled "Secondary Containment System Design and Operation". The design, operation, inspection, and construction of this area is such as to minimize the threat of possible ground water contamination.

Because of the absence of process operations at this facility in which an equipment or power failure could cause a threat to human health or the environment, the impact of such an occurrence would be negligible. However, in the event that loading or unloading activities might be under way during a power failure, and the available light were of an insufficient nature to safely complete the task, operations shall be

ceased until the power company is notified and the cause of the failure discovered and repaired. Any problems which might be isolated to a specific area of the facility or a particular machine shall be brought to the manager's attention for corrective actions with support from Regional Operations if required.

Because the hazardous wastes to be handled at this facility are only "used" versions of the solvents which are routinely handled at the location in their virgin form, no particular hazards to either equipment, personnel or the environment are anticipated. Warehouse personnel wear durable work clothing gloves and hard hats while handling drums or pallets of drums. All loading and unloading of drums of hazardous waste is done within the warehouse, so any accidental spill or leaks, being handled immediately, poses no threat to water supplies. The hazardous waste storage area is bounded by a 3.5-inch curb, so no run-off to other areas of the warehouse can occur. Because the storage area is inside the warehouse, no flooding from storm-water run-off can occur. Prevention of ignition is described in the next section.

DSW, Inc.

branches maintain on-site Material Safety Data Sheets for the products which they distribute. Example of Material Safety Data Sheets for virgin solvents follow; the safety precautions and practices apply to the same materials in waste form. These data sheets are kept on file and are updated routinely so that branch personnel have accurate information available regarding toxicity, fire and explosion hazards,

DSW, Int.

Procedures, Structures, Equipment
Page 4.

protective equipment recommendations, and first aid. Available protective and emergency equipment which is kept at the facility is presented in the section entitled "Contingency Plan". Use of personal protective equipment is strictly enforced and is covered in the employees' initial training, as well as being reinforced on a routine basis in monthly safety meetings which are conducted by the facility management.

REVISED
SEPT. 22, 1986



MATERIAL SAFETY DATA SHEET

(Approved by U.S. Department of Labor "Essentially Similar" to Form LSB-009-4)



CHEMICAL NAME: ETHYL ACETATE, 85-90% - DENATURED

SYNONYMS: Acetic Acid, Ethyl Ester;
Ethyl Ethanoate; Acetic Ester

CHEMICAL FAMILY: Esters

FORMULA: $\text{CH}_3\text{COOC}_2\text{H}_5$

MOLECULAR WEIGHT: 88.11

TRADE NAME AND SYNONYMS: Ethyl Acetate

I. PHYSICAL DATA

| | | | |
|---|---|---|-----------|
| BOILING POINT, 760 mm. Hg | 75°C. (167°F.) | FREEZING POINT | <-100°C. |
| SPECIFIC GRAVITY ($\text{H}_2\text{O} = 1$) | 0.884 at 20/20°C. | VAPOR PRESSURE at 20°C. | 69 mm. Hg |
| VAPOR DENSITY (air = 1) | 3.04 | SOLUBILITY IN WATER, % by wt. at 20°C. | 22 |
| PER CENT VOLATILES BY VOLUME | 100 | EVAPORATION RATE (Butyl Acetate = 1) | 6.15 |
| APPEARANCE AND ODOR | Water-white liquid; esteric, fruity odor. | | |

II. HAZARDOUS INGREDIENTS

| MATERIAL | % | TLV (Units) |
|----------------|---|-------------|
| Not applicable | | |
| | | |
| | | |
| | | |

III. FIRE AND EXPLOSION HAZARD DATA

| | | | | | |
|---------------------------------------|---|-----------------------------|-----|--------|-----|
| FLASH POINT (test method) | 56°F., Tag open cup | AUTOIGNITION TEMPERATURE | | 800°F. | |
| FLAMMABLE LIMITS IN AIR, % by volume | | LOWER | 2.5 | UPPER | 9.0 |
| EXTINGUISHING MEDIA | Carbon dioxide or dry chemical for small fires. Ordinary foam for large fires. | | | | |
| SPECIAL FIRE FIGHTING PROCEDURES | None | | | | |
| UNUSUAL FIRE AND EXPLOSION HAZARDS | None | | | | |

EMERGENCY PHONE NUMBERS

Dr. C. U. Dernehl, 212/551-4785; 914/946-0646 (night)
Dr. K. S. Lane, 212/551-4787; 914/666-3656 (night)
C. P. Carpenter, Ph.D., 412/327-1020; 412/241-7896 (night)

Legal responsibility is assumed only for the fact that all studies reported here and all opinions are those of qualified experts.

IV. HEALTH HAZARD DATA

| | |
|------------------------------------|--|
| THRESHOLD LIMIT VALUE | 400 ppm. |
| EFFECTS OF OVEREXPOSURE | Headache, nausea, vomiting, and narcosis. |
| EMERGENCY AND FIRST AID PROCEDURES | Move to fresh air and call a physician. If swallowed, induce vomiting and call a physician. Flush skin and eye contact with water. |

V. REACTIVITY DATA

| | | | |
|--------------------------------------|----------------|--|------------------------------------|
| STABILITY | | CONDITIONS TO AVOID | Heat and fires. |
| UNSTABLE | STABLE | | |
| — | ✓ | | |
| INCOMPATIBILITY (materials to avoid) | | Strong alkalis. | |
| HAZARDOUS DECOMPOSITION PRODUCTS | | Thermal decomposition may produce carbon monoxide and/or carbon dioxide. | |
| HAZARDOUS POLYMERIZATION | | CONDITIONS TO AVOID | Contamination with strong alkalis. |
| May Occur | Will not Occur | | |
| — | ✓ | | |

VI. SPILL OR LEAK PROCEDURES

| | |
|--|------------------------------------|
| STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED | Flush with large volumes of water. |
| WASTE DISPOSAL METHOD | Incinerate in a furnace. |

VII. SPECIAL PROTECTION INFORMATION

| | | | |
|---------------------------------------|----------------------|---|------------------------|
| RESPIRATORY PROTECTION (specify type) | | Air-supplied mask for vapors above 2% by volume | |
| VENTILATION | LOCAL EXHAUST | Preferable | SPECIAL None |
| | MECHANICAL (general) | Acceptable | OTHER None |
| PROTECTIVE GLOVES | | — | EYE PROTECTION Goggles |
| OTHER PROTECTIVE EQUIPMENT | | Safety shower and eye bath | |

VIII. SPECIAL PRECAUTIONS

| | |
|---------------------------------------|---|
| PRECAUTIONARY LABELING | ETHYL ACETATE, 85-90% — DENATURED WARNING! FLAMMABLE. BREATHING OF VAPOR MAY BE HARMFUL. Keep away from heat, sparks, and fire. Do not leave container open. Use with adequate ventilation. Avoid breathing of vapor. Avoid prolonged or repeated contact with skin. FOR INDUSTRY USE ONLY |
| OTHER HANDLING AND STORAGE CONDITIONS | — |

U.S. DEPARTMENT OF LABOR

WAGE AND LABOR STANDARDS ADMINISTRATION Bureau of Labor Standards

MATERIAL SAFETY DATA SHEET

SECTION I

| | | |
|--|---|---|
| MANUFACTURER'S NAME PPG Industries, Inc. | | EMERGENCY TELEPHONE NO. (318) 882-1200 |
| ADDRESS (Number, Street, City, State, and ZIP Code) No. 1 Gateway Center, Pittsburgh, Pa. 15222 | | |
| CHEMICAL NAME AND SYNONYMS Trichlorethylene - Trichloroethylene | | TRADE NAME AND SYNONYMS Trichlor |
| CHEMICAL FAMILY Chlorinated Solvents | FORMULA $\text{CCl}_2 = \text{CHCl}$ | |

| PAINTS, PRESERVATIVES, & SOLVENTS | % | TLV (Units) | ALLOYS AND METALLIC COATINGS | % | TLV (Units) |
|---|-----|----------------|---|---|----------------|
| PIGMENTS | | | BASE METAL | | |
| CATALYST | | | ALLOYS | | |
| VEHICLE | | | METALLIC COATINGS | | |
| SOLVENTS | 100 | 100 | FILLER METAL PLUS COATING OR CORE FLUX | | |
| ADDITIVES | | | OTHERS | | |
| OTHERS | | | | | |
| HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES | | | | % | TLV (Units) |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

| | | | |
|-------------------------|---------------------------------|---|------|
| BOILING POINT (°F.) | 188.4 | SPECIFIC GRAVITY ($\text{H}_2\text{O}=1$) | 1.46 |
| VAPOR PRESSURE (mm Hg.) | 58 | PERCENT VOLATILE BY VOLUME (%) | 100 |
| VAPOR DENSITY (AIR=1) | 4.54 | EVAPORATION RATE (<u>ether</u> = 1) | 0.28 |
| SOLUBILITY IN WATER | Negligible | | |
| APPEARANCE AND ODOR | Clear, colorless, ethereal odor | | |

| | | | |
|--|--|------------------|---------|
| SECTION IV. FIRE AND EXPLOSION HAZARD DATA | | | |
| FLASH POINT (Method used) | None (Tag, open or closed) | FLAMMABLE LIMITS | LeI UeI |
| EXTINGUISHING MEDIA | | | |
| SPECIAL FIRE FIGHTING PROCEDURES | Vapors can be ignited only by high intensity source of ignition. Combustion forms HCl and possible traces of phosgene. | | |
| UNUSUAL FIRE AND EXPLOSION HAZARDS | | | |

SECTION V. HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE 100

EFFECTS OF OVEREXPOSURE Loss of coordination and equilibrium to actual consciousness, and even death, in unventilated areas (such as tanks).

EMERGENCY AND FIRST AID PROCEDURES

Move to fresh air, use artificial respiration if breathing has stopped. Administer oxygen after breathing has been restored.

(Never administer adrenalin!) Call physician (he should not administer adrenalin).

SECTION VI. REACTIVITY DATA

| | | | |
|-----------|----------|---|---------------------|
| STABILITY | UNSTABLE | | CONDITIONS TO AVOID |
| | STABLE | X | |

INCOMPATIBILITY (Materials to avoid)

Avoid mixing with caustic soda and caustic potash.

HAZARDOUS DECOMPOSITION PRODUCTS

HCl and possible traces of phosgene

HAZARDOUS
POLYMERIZATION

MAY OCCUR

WILL NOT OCCUR

X

CONDITIONS TO AVOID

SECTION VII. SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Adequate ventilation must be provided.

Workmen should be provided with fresh air masks or sent to fresh air.

WASTE DISPOSAL METHOD

Forced ventilation or evaporation

SECTION VIII. SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)

Fresh air masks when necessary

VENTILATION

LOCAL EXHAUST

Sufficient to maintain TLV

SPECIAL

MECHANICAL (General)

OTHER

PROTECTIVE GLOVES

Neoprene or Viton

EYE PROTECTION

Glasses or goggles

OTHER PROTECTIVE EQUIPMENT

Neoprene apron

SECTION IX. SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

OTHER PRECAUTIONS

WAGE AND LABOR STANDARDS ADMINISTRATION
Bureau of Labor Standards

MATERIAL SAFETY DATA SHEET

SECTION I

| | | |
|---|--|--|
| MANUFACTURER'S NAME PPG Industries, Inc. | | EMERGENCY TELEPHONE NO. (318) 882-1200 |
| ADDRESS (Number, Street, City, State, and ZIP Code) One Gateway Center, Pittsburgh, Pa. 15222 | | |
| CHEMICAL NAME AND SYNONYMS Methylene Chloride, dichloromethane | | TRADE NAME AND SYNONYMS Methylene Chloride |
| CHEMICAL FAMILY Chlorinated Hydrocarbons | FORMULA CH₂Cl₂ | |

| HAZARDOUS INGREDIENTS | | | | | |
|---|-----|-------------|--|---|-------------|
| PAINTS, PRESERVATIVES, & SOLVENTS | % | TLV (Units) | ALLOYS AND METALLIC COATINGS | % | TLV (Units) |
| PIGMENTS | | | BASE METAL | | |
| CATALYST | | | ALLOYS | | |
| VEHICLE | | | METALLIC COATINGS | | |
| SOLVENTS | 100 | 500 | FILLER METAL PLUS COATING OR CORE FLUX | | |
| ADDITIVES | | | OTHERS | | |
| OTHERS | | | | | |
| HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES | | | | % | TLV (Units) |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

| PHYSICAL DATA | | | |
|-------------------------|------------|---|-------|
| BOILING POINT (°F.) | 104 | SPECIFIC GRAVITY (H ₂ O=1) (25/25°C) | 1.320 |
| VAPOR PRESSURE (mm Hg.) | 340 | PERCENT VOLATILE BY VOLUME (%) | 100 |
| VAPOR DENSITY (AIR=1) | 2.93 | EVAPORATION RATE (ether=1) | 0.71 |
| SOLUBILITY IN WATER | Negligible | | |
| APPEARANCE AND ODOR | | | |

| SECTION IV FIRE AND EXPLOSION HAZARD DATA | | | | | | | |
|---|----------------------------|------------------|---|-----|-----|------|------|
| FLASH POINT (Method used) | None (Tag, open or closed) | FLAMMABLE LIMITS | <table border="1"> <tr> <td>LeI</td> <td>UeI</td> </tr> <tr> <td>None</td> <td>None</td> </tr> </table> | LeI | UeI | None | None |
| LeI | UeI | | | | | | |
| None | None | | | | | | |
| EXTINGUISHING MEDIA | | | | | | | |
| SPECIAL FIRE FIGHTING PROCEDURES | | | | | | | |
| | | | | | | | |
| UNUSUAL FIRE AND EXPLOSION HAZARDS | | | | | | | |
| | | | | | | | |

SECTION V. HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

500

EFFECTS OF OVEREXPOSURE

Loss of co-ordination and equilibrium to actual unconsciousness

and even death in unventilated areas (such as tanks).

EMERGENCY AND FIRST AID PROCEDURES

Move to fresh air, use artificial respiration if breathing has stopped. Administer oxygen after breathing has been restored.

(Never administer adrenalin.) Call physician (he should not administer adrenalin)

SECTION VI. REACTIVITY DATA

STABILITY

UNSTABLE

CONDITIONS TO AVOID

Open flames and welding arcs -

STABLE

X

explosive mixtures with oxygen under pressure.

INCOMPATIBILITY (Materials to avoid)

HAZARDOUS DECOMPOSITION PRODUCTS

HCl and small amounts of phosgene.

HAZARDOUS
POLYMERIZATION

MAY OCCUR

CONDITIONS TO AVOID

WILL NOT OCCUR

X

SECTION VII. SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Adequate ventilation must be provided.

Workmen should be provided with fresh air masks or sent to fresh air.

WASTE DISPOSAL METHOD

Forced ventilation or evaporation

SECTION VIII. SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)

Fresh air mask

VENTILATION

LOCAL EXHAUST

Sufficient to maintain TLV

SPECIAL

MECHANICAL (General)

OTHER

PROTECTIVE GLOVES

Neoprene or Viton

EYE PROTECTION

Glasses or goggles

OTHER PROTECTIVE EQUIPMENT

Neoprene apron

SECTION IX. SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

OTHER PRECAUTIONS

DSW, Inc.

Preparedness and Prevention

Communications - Internal communications rely on the telephone system and voice alerts. The telephone would be relied upon for summoning outside assistance, as spelled out in the Contingency Plan. All personnel have access to immediate contact with other employees during while working.

Fire extinguishers - Extinguishers are located, and maintained as described under Contingency Plan and Inspection Schedules.

Water supply - Water is supplied to the branch by the Riverview Water Plant of Hillsborough County Utilities. Management of that plant estimates that water pressure at [REDACTED] is about 55 psi.

Aisle space - The layout of the small 19 foot x 21 foot secondary containment area permits unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment.

Arrangements with authorities - Upon approval of the Contingency Plan, copies will be distributed to local police, fire, hospital and emergency authorities to ensure their being aware of the DSW, Inc. installation and its activities.

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SEPT. 22, 1986

DSW, Inc. .

Personnel Training

DSW, Inc. is an established major distributor and repacker of a wide variety of industrial chemicals and solvents, many of which are hazardous (flammable, corrosive, toxic, oxidative); consequently, the Company has in place a training program designed to acquaint its employees with the dangers of these hazardous materials and to train them in their safe handling. The expansion of the branch's business to include the temporary storage of a limited variety of spent solvents, therefore, has had a solid foundation upon which to build the additional training needed for the handling of these hazardous wastes.

The approximately 70 branches of DSW, Inc. are divided into three Regions headquartered in Oak Brook, Illinois, Spartanburg, South Carolina, and Santa Fe Springs, California. Each Region in turn, is divided into Areas, which are composed of a number of Branches.

The organization structure of a typical DSW, Inc. branch is headed by a Manager, who is assisted by a Branch Operations Manager and a Branch Administrative Manager. The last two positions have staff manager counterparts at the Area office, who provide formal training for new employees and refresher training for present employees in their respective disciplines. Thus, in addition to the on-the-job training/experience acquired by an employee, he/she is assured a formal teaching exposure which is then documented in his/her record.

REVISED
SEPT. 22, 1986

The Manager of the Branch and Branch Administrative Manager are involved in compliance with RCRA regulations, but typically are not involved in the actual supervision of handling the wastes. That responsibility lies chiefly with the Branch Operations Manager, who is primarily involved with the handling and maintenance of waste materials while they are in storage at the branch. This position carries the responsibility of assuring that the routine inspections and physical handling procedures are adhered to. The Administrative Manager is involved with such paperwork such as that related to in-and-out shipments, inventory control, and maintenance of records involving hazardous wastes.

None of these individuals is required to be trained prior to employment in hazardous waste management situations. On-the-job training is accomplished within six months of employment by Branch Management and the Area RCRA Training Director on all facets of hazardous waste management. Responsibilities for hazardous waste management are not delegated until such training is completed.

Updating of the training of trained hazardous waste personnel is carried out at least annually.

The duties, responsibilities, and qualifications for these three management positions follow.

Personnel Training
Page 3.

Position: Branch Manager

Responsibilities and Duties:

- Functions as Emergency Coordinator in the absence of appointed individual.
- Has overall responsibility for selection of personnel and supervision of training programs, including proper use of equipment, fire fighting equipment, alarm systems, emergency procedures, material management (including waste items), maintenance, Contingency Plan implementation, etc. The actual conducting of training in these areas may be delegated to other supervisory personnel, although the responsibility to assure its adequate completion remains the Branch Manager's.
- Supervises and oversees facility's ongoing safety program, which includes the assurance of the conducting of monthly safety meetings.
- Works in conjunction with Regional Office personnel in assuring the proper attainment of permits and licenses from local, state, and Federal agencies.
- Supervises branch sales personnel and the profitability of the facility. Works in resolving problems arising with potential customers wishing to utilize the Company's waste handling capabilities. Assures that customers and branch have appropriate permits and that all necessary and required data as set forth in the regulations and Company procedures are adhered to and

present at the location for proper management of materials.

- Addresses, and takes appropriate actions on problems brought to his attention by subordinates.
- Makes proper notification of emergency situations and/or implementation of the Contingency Plan to appropriate Company and government authorities as outlined in other sections.

Experience and Qualifications:

- High school graduate - college desirable
- 3-5 years sales or sales management experience with supervisory responsibilities.

Position: Branch Operations Manager

Responsibilities and Duties:

- Is usually the facility's Emergency Coordinator.
- Supervises overall operation and maintenance of the physical aspects of the facility in compliance with all applicable government regulations and Company operating procedures.
- Maintains facility compliance with RCRA and other governmental agency regulations specific to waste management practices.
- Maintains operational logs, maintenance records, inspection records, and conducts monthly safety meetings with branch operations personnel.
- Supervises loading/unloading of all materials (include wastes), placement of material, and required paperwork as required by Company procedures.
- Is involved in the training and indoctrination of new personnel at the branch facility.
- Notifies Branch Manager of emergency situations.
- Schedules all maintenance and repair of equipment and facility structure of both a routine and non-routine nature.
- Oversees the drivers' activities to assure compliance with all appropriate procedures for transporting of materials, accepting waste materials, response to emergency situations, and equipment maintenance.

- Monitors and approves the findings of waste container and emergency equipment inspections, and implements any necessary remedial activities if inspection reports warrant.
- Reports to the Branch Manager.

Experience and Qualifications:

- High school graduate
- 1-2 years of experience or training in transportation, handling of hazardous materials, and warehousing activities. Supervisory experience desirable.

Position: Branch Administrative Manager

Responsibility and Duties:

- Supervises general office activities, including proper handling of paperwork involved in waste receipts and shipments as outlined by Company procedures.
- Notifies Branch Manager of emergency situations and may act as an alternate Emergency Coordinator in his or the Branch Operation Manager's absence.
- Assures that necessary reports, records, notifications, etc., are prepared to comply with RCRA, as well as all other government regulations. This include routine activities as well as non-routine occurrences, such as implementation of the facility Contingency Plan.
- Reports to the Branch Manager.

Experience and Qualifications:

- High school graduate
- 1-2 years in office related work with supervision experience desirable.

DSW, Inc.

POSITION GUIDE

(INSTRUCTIONS ON PAGE FOUR)

| | | | |
|-------------|---|---------------------------|----------|
| INCUMBENT | A. | | |
| | TITLE Warehouseman | | NAME |
| | CORPORATE STAFF/COMPANY DSW, Inc. | | DIVISION |
| | DEPARTMENT | LOCATION "Your Branch" | DATE |
| | B. GENERAL STATEMENT OF POSITION FUNCTION | | |
| | A DSW, Inc. warehouseman is responsible to the Branch Operations Manager/Branch Manager for the safe, efficient performance of the functions assigned him. In order to carry out these responsibilities he must have completed the required written and driving tests and be qualified to operate a forklift truck. Upon completion of indoctrination and training he will perform his work in strict accordance with all safety, storage, and handling practices as required under O.S.H.A., the National Fire Protection Agency, the Environmental Protection Agency, the Food and Drug Administration, the Department of Transportation, and Company policy. All functions of loading, unloading, stacking, palletizing, storage and movements of material are to comply with Company standards. He will maintain cordial relationships with both internal and external sources in the best interest of the Company and perform his work to protect the public, his fellow workers, and the environment. | | |
| | | | |
| | | | |
| | | | |
| | | | |
| TITLE | C. APPROVALS (Must be completed prior to recruiting, hiring, transfer or promotion into position - if used as personnel requisition) | | |
| | MANAGER | | DATE |
| | PERSONNEL DEPARTMENT | | DATE |
| | ORGANIZATION AND MANAGEMENT PLANNING (GRADE 15 AND ABOVE) | | DATE |
| | COMPENSATION (To be completed by Personnel Department) | | |
| GRADE LEVEL | | DATE | BY |

 REVISED
 SEPT. 22, 1986

D. POSITION SCOPE

| | | |
|--|--------------|------------------------------|
| REPORTS TO | NAME | TITLE |
| | "Supervisor" | " " |
| SUPERVISES DIRECTLY | TITLE | NO. OF EMPLOYEES |
| | TITLE | NO. OF EMPLOYEES |
| | TITLE | NO. OF EMPLOYEES |
| SUPERVISES INDIRECTLY (NUMBER OF EMPLOYEES) | | EXEMPT 0 NON-EXEMPT 0 |

FINANCIAL

SALES/BUDGETS/PROFITS \$

ASSETS \$

RELATIONSHIPS

| INTERNAL | EXTERNAL |
|-------------------------------------|--------------------------|
| Branch Manager | Customer |
| Administrative - Operations Manager | Other Branch's Employees |
| Truck Drivers | |
| | |
| | |
| | |

E. POSITION SPECIFICATIONS (Qualifications for job)

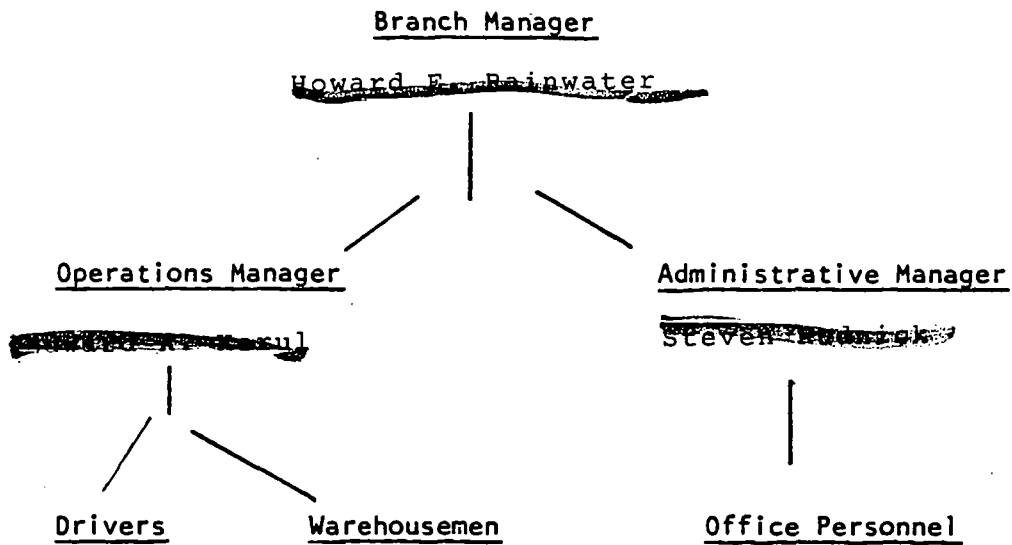
| | |
|---------------------------------|---|
| EDUCATION/ KNOWLEDGE | Min. -- High School graduate or equivalent |
| EXPERIENCE | Min. -- 18 years of age. -- 6 months experience operating forklift. |
| SKILLS | --Capable of operating assigned forklift. --Successful completion of forklift written and skills exam. --Successful completion of lifting exam. --Successful completion of matching exam. --Complete training requirements of EPA regulations regarding loading/unloading, storing, and shipment of hazardous wastes. --Knowledgeable of D.O.T. regulations regarding loading, bracing, shipping, etc. |

| F. MAJOR RESPONSIBILITIES | WEIGHT (Importance) | STANDARDS OF PERFORMANCE (How responsibilities are measured) |
|----------------------------|------------------------|---|
| Warehousing | 40-50% | <p>--Responsible for all safety guidelines as outlined by Company policy and training (i.e. use of safety equipment, proper modes of operation and procedures, equipment inspections-- maintenance, etc.)</p> <p>--Full compliance with all DOT/EPA regulations as outlined in training sessions. All incidents of a nature requiring management attention are to be immediately reported to management for thorough investigation and necessary action.</p> <p>--Compatible storage of all materials at facility as dictated by Company standards and regulatory agencies.</p> <p>--Compliance with requirements for proper storage and monitoring of waste materials as outlined in EPA 40 CFR.</p> |
| Loading/Shipping/Receiving | 30-40% | <p>--Full compliance with DOT/EPA (governing waste and "virgin" material movements) and Company procedures for loading, bracing, offering appropriate placards, reviewing shipping papers (including manifests), handling internal paperwork, etc.; to effect legal and efficient movements of material.</p> |
| Maintenance | 5-10% | <p>--Adherence to forklift and other warehouse equipment P.M. programs as outlined by management.</p> <p>--Housekeeping within the branch facility to meet Company standards to protect the branch's assets from deterioration other than that of normal wear and tear.</p> |
| | 100 % | |

DSW, Inc.

Personnel Training

In case of the Tampa, Florida branch, the relevant organization chart is outlined below:



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SEPT. 22, 1986

All three management personnel have attended a DSW, Inc., hazardous waste training session led by Hal E. Brown, the Regional Warehousing manager, who is the Training Director for the Southeastern Region of the company.

Mr. Brown holds science degrees from the University of Pennsylvania and from Yale (Master's). He

has held his current position almost four years. In this capacity, he is responsible for all warehousing and related functions for the eleven branches comprising the Southeastern Region. This includes the drawing up of formal safety programs (training, safety meetings, direct mailing of safety literature, quarterly safety audits of each branch, analysis of each accident or near-accident with subsequent dissemination of details to the branches, accident investigations, application of disciplinary acts) as well as responsibility for purchasing, maintenance and training in the use of all warehouse and repacking machinery, specifying and purchasing containers and storage vessels used by the branch, as well as the repair and maintenance of the warehouse, yard, and repacking installation of each branch. It was only a short, logical step from these comprehensive responsibilities involving hazardous materials to the responsibilities required for the safe handling of hazardous wastes, which are essentially a "used" version of the materials routinely handled by each DSW, Inc. Branch.

He has attended a number of related seminars and training courses, such as the Hazardous Materials/Wastes Management Compliance Seminar conducted by Transportation Skills Program, Inc.

The training of the other branch personnel involved in the handling of hazardous waste - the warehousemen - is the responsibility of the local management, usually the Branch Operations Manager who had received his hazardous waste-related training from the Regional Training Director, who will have directed the initial training program at this branch. In his regular capacity as Regional Warehouse Manager, the Training Director will be aware of and assured that the technical competency of the Branch Operations Manager is adequate.

Outlines of the training programs for (1) the branch management and (2) the warehousemen follow.

Training sessions conducted with branch personnel involved with hazardous wastes typically involve a full day's session of classroom instruction. The topics reviewed at these sessions are designed to give a broad overview of the intent of the regulations, as well as explaining and training the employees in specific company procedures which had been developed for facilities to follow in order to comply with the requirements set forth in the regulations. Review is provided to the employees on registration of their particular branch for specific types of wastes. Frequent updates and advisories are forwarded from the Regional Office to keep employees current on hazardous waste regulations which might impact their branch's operations.

DSW, Inc. has adopted the appended training outlines for those branch personnel involved with hazardous waste - branch management as described previously and warehousemen ("hands-on personnel").

DSW, Inc. '___

Training Program Outline

(Revised)

A. Branch Management:

1. General Facility Considerations - Generators, Transporters, Permits, ID Numbers, Administrative Procedures.
2. Waste Analysis Responsibilities and Procedures.
3. Preparedness - Equipment, Communications, Emergency Prevention.
4. The contingency Plan - Responsibilities, Current Status, Procedures, the Emergency Coordinator, Distribution, Revisions.
5. Recordkeeping, the Operating Record, Inventory Control (Manual Cards).
6. Inspections - Inspection Log.
7. Security.
8. The Closure Plan, Financial Responsibilities.
9. Training, Responsibilities, Records, Role of Branch, Role of Area, Role of Region.
10. Handling Hazardous Waste, Containers, Storage, Inspections, Inventory, Ignitables.

The following areas were covered in training sessions during the week of October 8, 1984, on-site. With follow-up training the week of November 26, 1984, again on-site. The following personnel were present for training:

Ed Kerul - Oprs Mgr
Ed Collins - Whse/Blk Lqd Sup
Ron Gentry - Cl₂ Dept Mgr

Training was conducted by Howard E. C. (Hal) Brown, Atlanta Area Operations and Safety Manager.

REVISED
SEPT. 22, 1986

DSW, Inc.

Training Program Outline

Page 2.

B. Warehousemen

1. Orientation with Company Structure
2. Safety Considerations, Safety Equipment Use and Maintenance,
Locations of Equipment.
3. Warehouse Equipment, Forklifts, Pallets, Drum Grabbers, Dock
Plates.
4. Paperwork, Hazardous Waste Manifests, Receiving Trickets.
5. Emergency Response, Contingency Plan, Evacuation Plans.
6. Housekeeping.
7. Drum Handling, Drum Storing Techniques.
8. Hazardous Waste Responsibilities, Manifests.

REVISED
SEPT. 22, 1986

TRAINING GUIDE AND DOCUMENTATION
WAREHOUSEMEN

Employee Name _____

Instructor(s) _____

Date Hired _____

☐ Original Training

☐ Review

PRELIMINARY: Before actual training and work activity is undertaken by the new employee, management should be certain that all areas contained on PER-85 "Employment Checklist" have been completed and reviewed with the employee, and the appropriate signatures have been acquired

I. Employee General Orientation

The instructor shall review with the employee all items contained on PER-89, "Employee Orientation Checklist" as a general overview of basic Company and location policy. As required on PER-89, a six day follow-up/review should be conducted with the individual. See also the Chemical Operations Manual, Ref. 70.05 and 70.10.

II. Safety

NOTE: The instructor should refer to the Chemical Operations Manual, Ref. 10.06, "Training Employees", prior to starting training.

A. Company Safety Program (Ch. Op. Ref. 10.07)

1. Accident and Loss Prevention Policy (Ch.Op.Ref. 10.05).
2. Safety Audits.
3. Safety Committees (Ch. Op. Ref. 10.06).
4. Safety Meetings.
5. Required reporting of incidents or unsafe situations to supervisor.
6. Trained first aid personnel.
7. Smoking areas.

B. Emergency Response

1. Review of branch Emergency/Contingency Plans for various emergency situations. Show where plans are located throughout facility. Discuss evacuation signals, evacuation procedures, job
- (Continued)

B. Emergency Response (Continued)

assignments in emergency situations; all as it applies to the trainee.

2. Review of procedure to be followed if trainee were to receive an emergency call regarding an off-site incident.
3. Review of Material Safety Data Sheets--information contained on form, location, etc.
4. CHEMTREC - review of organization and when contact appropriate (Ch. Op. Ref. 10.22).

C. Safety Equipment - Use and Maintenance

1. Discuss the appropriate conditions under which certain pieces of equipment must be used.
2. Review and demonstration of safety and emergency equipment present at branch. Instruction on appropriate use, inspection, maintenance, storage location, etc. A list of items to be reviewed should include but may not be limited to:

- a) Rubber Suits
- b) Rubber Boots
- c) Rubber Gauntlet Gloves
- d) Canvas Gloves
- e) Chemical Goggles
- f) Face Shields
- g) Hard Hats
- h) Fire Extinguishers (different types, sizes, locations, inspections, etc.) (Ch. Op. Ref. 80.01)
- i) First Aid Kits
- j) Neutralizer (limitations, locations)
- k) Safety Shower

(Continued)

C. Safety Equipment - Use and Maintenance (Continued)

- l) Recovery Drums (review the need for labeling, marking)
- m) Chlorine Kit
- n) Assorted tools which may be used in emergency situations. Review spark-proof tool usage in appropriate situations.
- o) Hazorb, absorbents
- p) Other articles at location

3. Review and demonstration of the various types of respiratory protective equipment present at your location. Discuss the proper selection, inspection, capabilities and limitations, maintenance, storage, etc., of a particular unit. (Ch. Op. Ref. 10.80)
Review those appropriate to location:

- a) Self-contained units (Air Packs)
- b) Canister type respirators -- review various canisters, shelf life of canisters, etc.
- c) Gas masks
- d) Dust Masks
- e) Other

4. Review the documentation of inspection of all safety equipment and the importance of notification to supervisor of use of air packs, extinguishers, etc., so that recharging or replacement is made.

(Continued)

III. Utilization and Maintenance of Warehouse Equipment

- A. Review various warehouse equipment which is present at location. Discussion should be included on selection, use, load limitations, and maintenance of all items. A partial listing would include but not be limited to the following:

1. Sweeper
2. Scrubber

NOTE: Regarding the above items, if battery powered units are present, demonstration should be given on how to properly connect unit to charger, along with routine maintenance procedures such as filter checks, brush replacement, cleaning, cleaner usage, etc.

3. Lift-O-Matic
4. Pallets - different sizes and uses. Do not allow overhang if possible. Discuss maintenance and out of service conditions for pallets. Review the dedication of pallets for USP and Poison material.
5. Pallet Pullers
6. Pallet Trucks
7. Dock Plates, Levelers, Bumpers, Seals
8. Pallet Racks - discuss the importance of compatibility of materials in racks, load limits (typically 6000#/shelf), maintaining of heavier load low, use of good quality pallets and appropriately sized, keeping of liquid items from being stored above dry materials to guard against ruining of dry materials in the event of leaks.
9. Wheel chocks (truck and rail)
10. Trailer jacks
11. Derails and warning signs
12. Car movers
13. Rail car door pullers
14. Trailer straps, load bars, blocking and bracing materials.

(Continued)

15. Drum trucks and Hand trucks
16. Air compressors
17. Boilers
18. Heaters
19. Sprinklers
20. Banders
21. Stretch Wrap
22. Others as appropriate to location

IV. Forklifts

A. Certification

1. Written Exam - administered and reviewed
2. Skill Demonstration Exam - administered and reviewed.

NOTE: Upon satisfactory completion and review of the above items, the trainee is to be issued an operators card.

B. Review of branch forklift(s) load capacities.

C. Care and Maintenance

1. Daily inspection sheets - review of how to prepare and demonstration of conducting a proper inspection.
2. Review of proper start-up and shut-down procedures. Fuel shut-off, removal of keys, forks at floor, etc.
3. Fuel storage and control requirements. Demonstration of the proper means of changing tanks.
4. Preventative Maintenance - frequency, responsibility.

V. Paperwork

(Continued)

A. Forms - review the various forms which the trainee may be exposed to in his/her daily job functions. Discuss the appropriate use, review, preparation of forms. The forms reviewed may include but not be limited to:

1. Bill of Lading
 - a) ~~DSW~~ Inc: prepared
 - b) Outside carrier, supplier
2. Purchase Orders
3. Receiving Tickets
4. Pick up notices
5. Hazardous Waste manifests
6. Empty Container Receipts
7. C.O.D. procedures
8. Material Scrap Reports
9. Fuel tickets
10. Empty Container Scrap Reports
11. Job Tickets and Supplemental Job Tally cards.
12. Product meter tickets
13. Scale Tickets
14. Others as appropriate

Note: It is unlikely that the trainee will be totally familiar with the preparation and routing of the forms immediately after training. Continued follow-up and review is required to allow the trainee to become self-sufficient.

(Continued)

REVISED
SEPT. 22, 1986

- B. Discuss the necessity for review of paperwork to assure that errors are not allowed to go unnoticed. The importance of continual double-checks should be stressed.

VI. Material Handling - Warehouse and Loading

- A. General review of types of packages handled at facility (bags, drums, cylinders, portable tanks, etc.)
- B. Review of hazardous materials - identification by DOT labels on packages, types of hazards, designated inside and outside storage areas for particular hazard groups, etc. (Ch. Op. Ref. 10.70 and 30.55, Exhibit I).
- C. Review of DOT loading restrictions on trailers (Ref.- Wall Loading Charts. See also Section VII, "Compatibility...")
- D. Placarding requirements of trucks hauling hazardous materials. Requirement for shippers to offer carriers appropriate placards.
- E. First-In/First-Out inventory usage and maintenance.
- F. Proper action to be implemented in the event of package damage. Immediate use of:
 - 1. Tape
 - 2. Overbags
 - 3. Salvage drums
 - 4. Container transfer by appropriate personnel if branched approved.
- G. Disposition of damaged materials (dumpster off limits unless authorized)
- H. Requirement to notify the supervisor when a shipment is received having damage contained. (Freight Claims). (Ch. Op. Ref. 40.10).
- I. Segregation and compatibility of freight claim and damaged materials (Also see Section VII, "Compatibility ...")
- J. Detention and demurrage
- K. Cleaning of trailers and railcars.
- L. Weight distribution on trucks/trailers.

(Continued)

- M. Required loading and bracing techniques on trucks/trailers.
- N. Palletizing techniques--review of crosstie techniques for bags. Some basic parameters to be reviewed but not necessarily limited to include:

Bags

- 1. Crosstie 24 x 100# bags on 48" x 49" pallets.
- 2. Crosstie 21 x 100# bags on 42" x 48" pallets.
- 3. Short 100# bags can be palletized six across and five high (30 bags).
- 4. 50# bags -- 40 per pallet.

Drums

- 1. Drum size to dictate number contained on pallet - no overhang should be present.
- 2. 15 gallon deldrums and S.S. drums when palletized should have one strap of banding around belly when shipping (not necessary for storage).

Note: Height of palletized bags and drums will dictate stacking height in the warehouse and yard. Typically it is acceptable to stack three high but the weight of the material contained in the package and the package itself may dictate stacking only two high (i.e. Plasti-drums, sludge drums, powdery bagged materials). Bags must be palletized flat and neatly for safety so that the stacks are free standing. The adherence to a standardized palletizing and stacking procedure will aid in perpetual inventory control as well as shipping and receiving flow.

Cylinders

- 1. Standard number of 150# empty or full chlorine cylinders per pallet is 16 and requires 3 bands. Partial pallets of cylinders in storage are required to be secured in an upright position. Cylinders are to be palletized on special cylinder pallets only.
- 2. Ammonia cylinders require 3 bands and should be loaded with 12 cylinders per pallet.

(Continued)

3. Ton containers must be properly braced/chocked when in transit. In storage they should be placed on 4 x 4's (or similar method to raise them off ground) and chocked to prevent rolling.

O. Hazardous Waste - discussion of designated storage area and secondary containment system.

P. Review of proper lifting techniques.

VII. Compatibility and Storage Techniques (Ch. Op. Ref. 40.01)

A. Review of designated warehouse/yard storage areas for materials of given hazardous nature.

B. Maintaining of clear, clean, and marked aisleways.

C. Company Compatibility Program and branch binder -- review of binder location and its use.

D. Storage of drummed Flammable Liquids in quantities per OSHA standards (40 drum limit - 2200 gallons per group).

E. USP/Food Grade dedicated pallet program (Ch. Op. Ref. 40.61).

F. Hazardous Waste designated storage area and the compatibility requirements of materials stored within area.

G. Available reference materials.

1. MSDS's

2. Dow Stewardship (Ch. Op. Ref. 10.65).

3. Suppliers

4. Company Staff Personnel

VIII. Hazardous Waste Handling Procedures (As required under 40 CFR, Section 265.16) Required areas of training are the following:

A. DSW, Inc. general safety - covered under Section II, "Safety".

B. Hazardous Waste Manifest Procedures - to include: (Ref. "Manifesting Procedures") Contained in RCRA - Administrative Procedures.

1. Review of incoming shipments

- a) Count verification

- b) Proper labels

(Continued)

REVISED
SEPT. 22, 1986

- c) Proper containers
- d) Proper data filled in on manifest forms.

2. Preparation of reshipments

- a) Count verification
 - b) McKesson "add-on" labels to indicate manifest number, lot number, etc.
- C. Emergency/Contingency Plan - covered under Section II, "Safety".
- D. Container Receiving and Maintenance Procedures.
- E. Weekly Container Inspection - review of inspection form and logging requirements.
- F. Container Transfer Procedures in event of a "leaker" - review documentation requirements.
- G. Emergency Response procedures to be reviewed as it pertains to Hazardous Waste incidents.
- H. Evacuation Plan - covered under Section II, "Safety".
- I. Forklift Certification - covered under Section IV, "Forklifts".
- J. Compatibility - covered under Section VII, "Compatibility..."
- K. Emergency Equipment - covered under Section II, "Safety".
- L. Review the need for management to make the determination as to whether a virgin material which may have to be scrapped must be handled as a hazardous waste, and the proper means of accomplishing such.

NOTE: It is required that the individual be given an annual review of their training as it applies to H/W procedures - and be documented.

IX. Housekeeping, Sanitation, and General Facility Maintenance
(Ch. Op. Ref. 10.72 and 40.60)

- A. Accountability of the employee for assigned work area. Responsibility for tools, equipment, cleanliness, safety, etc.
- B. Clean up of work areas. Stress the importance of immediate clean up.

(Continued)

Training Guide and Documentation -- Warehousemen
Page Eleven

- C. Importance of nonobstruction of aisleways, stairs, ramps, and walkways.
- D. Dumpster location, nightly waste receptacle emptying.
- E. Good Manufacturing Practices (Ref. 40.62).
- F. Snow conditions. Necessity for shoveling and salting/sanding of work and pedestrian travel areas.
- G. Replacement of light bulbs means of access in warehouse area.
- H. Rodents, birds, and insects. Means of control and reason for 4" spacing from walls with goods.

Additional Specific Locational Training Requirements.

HAZARDOUS WASTE MANAGEMENT
TRAINING SESSION
Spartanburg, South Carolina
March 5, 1985

DISTRIBUTION:

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D.A. DAVIS

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To See Distribution

Date March 15, 1985

From D.M. Black

Location/Tel. North Haven

McKesson

**Intra Company
Correspondence**

Subject **HAZARDOUS WASTE MANAGEMENT Copies To
 TRAINING SESSION**

This meeting was a classroom session devoted to updating hazardous waste management practices on the part of the operations managers at the McKesson service centers located in the Atlanta and New Orleans Areas. Particular emphasis was placed on the responsibilities relative to the holding of interim status - specifically the requirement that the following be immediately available for inspection:

Contingency Plan
Waste Analysis Plan
Training Program
Inspection Schedule
Closure Plan and most recent Cost Estimate

The contents of these documents were reviewed and their implications described.

The requirements of the written Operating Record were reviewed:

1. A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its storage.
2. The location of each hazardous waste within the facility and the quantity at each location. This information must include cross-references to specific manifest document numbers.
3. Records and results of waste analyses performed.
4. Summary reports and details of all incidents that require implementation of the Contingency Plan.
5. Records and results of inspections.
6. Copies of the notices to generators that the McKesson facility has the appropriate permit(s) for, and will accept, the waste the generator is shipping.
7. The most recent closure cost estimate.

All of the above records are to be kept until the facility is closed, except that records and results of inspections (No. 5) need to be kept only 3 years.

The waste analysis verification procedure now in effect at the Little Rock , Fayetteville, Atlanta, Augusta, Chattanooga, Kingsport, Spartanburg, Charlotte and Greensboro branches was reviewed in detail.

The status of the various service centers in their respective permitting process was reviewed and questions relevant to each situation answered.

Jms

To

D.M. Black

Date

June 24, 1985

From

Hal Brown

Location/Tel.

ATLARLO/1816

Subject

HAZARDOUS WASTE TRAINING--
TAMPA MANAGEMENT

Copies To

Fred B. Hayes
Julian Foster
Gene Rainwater
Ed Kerul

M-Kesson
Intra Company
Correspondence

On Friday, June 21, 1985, Management Training for key personnel at the Tampa Service Center in Hazardous Waste Management was conducted by Hal Brown.

The following persons attended:

Ed Collins-Warehouse/Bulk Liquids Manager
Ed Kerul-Operations Manager
Gene Rainwater-Service Center Manager
Steve Rudnick-Administrative Manager

The training program consisted of the ten items covered on Attachment I (Training Program Outline). In addition to these items, special emphasis was given to the following specific topics:

Scheduling, coordinating, and inter-branch communicating to ensure rigid compliance with transporter standards; i.e., 10 day time limit on staging loads.

All hazardous waste survey forms were checked by Hal Brown for accuracy and completeness and appropriate corrections were posted to their DOT shipping descriptions and EPA waste numbers.

Operating records in total, and specifically, the operating log, were reviewed and positive steps were adopted to insure compliance with standards.

HECB/lah
Attachment

DSW, Inc.

Training Program Outline

A. Branch Management

1. General Facility Considerations - Generators, Transporters, Permits, ID Numbers, Administrative Procedures.
2. Waste Analysis Responsibilities and Procedures.
3. Preparedness - Equipment, Communications, Emergency Prevention.
4. The Contingency Plan - Responsibilities, Current Status, Procedures, the Emergency Coordinator.
5. Recordkeeping, the Operating Record, Inventory Control.
6. Inspections- Inspection Log.
7. Security.
8. The Closure Plan, Financial Responsibilities.
9. Training, Responsibilities, Records, Role of Branch, Role of Region.
10. Handling Hazardous Waste, Containers, Storage, Inspections, Inventory, Ignitables.

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SEPT. 22, 1986

FINANCIAL

DSW, Inc,
Closure Cost Estimate
Tampa, Florida Branch

| | | |
|--|-----------------|---------------|
| <u>I. Basic Disposal Charge</u> | | |
| 90 drums at \$65.00 | | \$5,850.00 |
| <u>II. Warehouse Labor (Loading)</u> | | |
| At hourly rate including fringe benefits - 3 hours required. | | \$35.00 |
| <u>III. Transportation</u> | | |
| To McKesson Envirosystems, New Castle, Kentucky 852 miles at \$1.25/mile — two loads. | | \$2,130.00 |
| <u>IV. Equipment Cost</u> | | |
| Forklift at \$5.00/hour - 3 hours required. | | \$15.00 |
| <u>V. Decontamination Cost</u> | | |
| Secondary Containment Area Cleaning 2 hours at \$30.00/hour | \$60.00 | |
| Disposal of Cleanup residue 2 drums at \$65.00 | \$130.00 | |
| Disposal of Pallets | \$100.00 | |
| Laboratory Services | <u>\$100.00</u> | |
| | | \$390.00 |
| VI. Contingencies at 20% of Subtotal of \$8420.00 | | \$1,684.00 |
| VII. Engineer Certification | | \$300.00 |
| <u>Total Cost of Closure</u> | | \$10,404.00 * |

*Revised closure cost as of June 27,
1986: \$11,153

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SEPT. 22, 1986

DSW, Inc.
1600 NORTON BUILDING
SEATTLE, WASHINGTON 98104
TELEPHONE (206) 447-3909

THE FINANCIAL ASSURANCE MECHANISM FOR CLOSURE AND LIABILITY
REQUIREMENTS WILL BE SUBMITTED SEPARATELY.

CONTAINERS

DSW, Inc.:

Container Management

Hazardous waste materials stored at this DSW, Inc. facility will be received from outside generators. This facility is used as an accumulation and transfer point of drummed materials received from generators in small lots, and reshipped in economic truckloads to an off-site recycling location. The containers utilized by customers to ship spent material to the DSW, Inc. facility are invariably of 55-gallon capacity or less. Containers typically utilized are constructed of steel, meeting DOT specification 17E for the most part; some 17H and 5B drums may occasionally be encountered. The customer is required to provide the spent material in a container authorized for the commodity as set forth by the Department of Transportation in 49 CFR 172.101.

Reuse of containers for waste materials by customers is allowed as authorized by the Department of Transportation, 49 CFR 173.28 ("Reuse of Packaging (containers)"). DSW, Inc. does request of its customers that if they are reusing containers, they place spent material back into a container which held the same material originally. This practice is encouraged to ensure that there is no risk of incompatible materials being introduced into the container which might result in container failure, or cause cross-contamination which may result in problems relating to the reclamation of the material.

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SEPT. 22, 1986

Thus, container management begins by DSW, Inc. / employees even prior to receipt of drummed materials at the facility. Waste materials which have been approved internally for handling may be accepted by a Company driver only if they have received a pick-up notice from the DSW, Inc. branch. The branch office, even prior to issuing such notice, has requested the customer (generator) to provide a photocopy of its manifest containing the pertinent information. This information would include all items pertaining to generator, transporter, destination, material description, ID numbers, etc. Some items, such as number of drums, dates, signatures, and weights are allowed to be left uncompleted until the actual day of pick-up of the material. A copy of the customer's original manifest is provided to the driver along with pick-up notice.

This mode of operation is followed for a number of reasons. First, it allows DSW, Inc. personnel an opportunity to review the generator's manifest for compliance and proper information. Secondly, it allows DSW, Inc. office personnel a chance to verify that an analysis of a sample of the proffered stream and supporting data are on file at the branch to comply with such requirements, and to verify that internal approvals have been given to accept a given waste item. Lastly, it gives DSW, Inc. drivers making pick-ups of such materials more accurate

information to look for.

Once a pick-up of material has been scheduled into a particular driver's routing, further assurances and checks are undertaken by the driver upon arrival at the generator's plant. Upon arrival, the driver must be presented with the original manifest by the generator's shipping personnel. The DSW, Inc. driver compares his photocopy of the generator's manifest, included with the pick-up notice, with that of the original. All items on the original must be complete with no modifications when compared with the photocopy sent to the DSW, Inc. office, other than quantity listing, dates, signatures, weights, etc. Any alterations such as an addition of different materials, or questionable variations, will cause the driver to refuse acceptance of the material, unless such modifications are approved by phone conversation with DSW, Inc. management at the branch.

Once the manifest(s) are checked and approved by the driver, the containers are checked for compliance before being loaded onto Company vehicles. DSW, Inc. encourages generators to utilize Labelmasters, Hazardous Waste Label, style WM-6, which complies with all requirements of 40 CFR 262.32. Other labels are allowed to be utilized by the generator as long as they contain all appropriate information. All Department of Transportation regulations pertaining to labeling and marking contained in 49 CFR 172 must also be followed.

REVISED
SEPT. 22, 1986

The appended checklist entitled "Hazardous Waste Pick-up Checklist" has been developed for use in training of drivers for picking up of waste materials from customers. This form is used primarily for training purposes, but in some instances is utilized by new and inexperienced drivers until a comfort level of knowing what items must be reviewed in accepting a waste shipment is attained.

Upon the return of the DSW, Inc! truck that picked up the waste material from the generator, DSW, Inc! warehouse personnel unload the material at the unloading area noted on the facility site plan, utilizing one of the forklift assigned to this location, having a lifting capacity of at least 4000 lbs. The appended "Container Receiving and Maintenance Procedure" follows this unloading operation, and, then, the waste analysis verification procedure described previously is implemented.

(In addition to the warehouse personnel procedures, the activities outlined in "RCRA Compliance - Administrative" are undertaken. This procedure bulletin, specifically Section VI through and including Section VIII, describes the internal paper flow and controls exercised to provide the necessary information and data necessary to properly manage and account for all waste material received and inventoried at this branch.)

Once these procedures are completed, the drums are carried by conventional forklift handling to the secondary containment area, described

later.

Containers holding waste are maintained in a closed condition while being stored at this facility. Because this facility functions as only an accumulation and transfer point, no opening of containers is required (other than as required for Waste Analysis Verification) unless a leaking container was found and transfer to another drum was required. Procedures are in place for such occurrences and are undertaken under management supervision with such incidents being noted and documented in the appropriate logs.

Waste containers while in storage at a DSW, Inc. branch are subject to a weekly inspection for specific defects as outlined under "inspections". Results of the inspection are recorded in the facility "Inspection Log".

While in the storage area, the drums will remain on the wooden pallets. Full pallets of drums will be normally stacked only two high, and those containing ignitables will be stored according to 29 CFR Sec. 1910.106(d)(5), a copy of which follows. Once a quantity of drums has been accumulated to form an economic truckload for reshipment to the recycling plant, the drums shall be brought back to the loading dock area from the hazardous waste storage location just prior to shipment. This again will be accomplished by forklift. Once in the loading dock area, the drums will be prepared for shipment and

loaded onto the truck.

Full compliance for receipt and reshipment of materials as it applies to manifesting and administrative procedures will be undertaken. All applicable DOT regulations pertaining to highway transit of hazardous materials and hazardous wastes will be complied with.

All containers stored at this facility will be held in the designated secondary containment area, detailed in the following section.

TABLE H-14—INDOOR CONTAINER STORAGE

| Class liquid | Storage level | Gallons | |
|--------------|-------------------------|------------------------------------|--------------------------------------|
| | | Protected storage maximum per pile | Unprotected storage maximum per pile |
| A | Ground and upper floors | 2,750 (50) | 660 (12) |
| | Basement | Not permitted | Not permitted |
| B | Ground and upper floors | 5,500 (100) | 1,375 (25) |
| | Basement | Not permitted | Not permitted |
| C | Ground and upper floors | 16,500 (300) | 4,125 (75) |
| | Basement | Not permitted | Not permitted |
| II | Ground and upper floors | 16,500 (300) | 4,125 (75) |
| | Basement | 5,500 (100) | Not permitted |
| III | Ground and upper floors | 55,000 (1,000) | 13,750 (250) |
| | Basement | 8,250 (450) | Not permitted |

NOTE 1: When 2 or more classes of materials are stored in a single pile, the maximum gallonage permitted in that pile shall be the smallest of the 2 or more separate maximum gallonages.

NOTE 2: Aisles shall be provided so that no container is more than 12 ft. from an aisle. Main aisles shall be at least 3 ft. wide and side aisles at least 4 ft. wide.

NOTE 3: Each pile shall be separated from each other by at least 4 ft.
(Numbers in parentheses indicate corresponding number of 55-gal. drums.)

TABLE H-15—INDOOR PORTABLE TANK STORAGE

| Class liquid | Storage level | Gallons | |
|--------------|-------------------------|------------------------------------|--------------------------------------|
| | | Protected storage maximum per pile | Unprotected storage maximum per pile |
| IA | Ground and upper floors | Not permitted | Not permitted |
| | Basement | Not permitted | Not permitted |
| IB | Ground and upper floors | 20,000 | 2,000 |
| | Basement | Not permitted | Not permitted |
| IC | Ground and upper floors | 40,000 | 5,500 |
| | Basement | Not permitted | Not permitted |
| II | Ground and upper floors | 40,000 | 5,500 |
| | Basement | 20,000 | Not permitted |
| III | Ground and upper floors | 80,000 | 22,000 |
| | Basement | 20,000 | Not permitted |

NOTE 1: When 1 or more classes of materials are stored in a single pile, the maximum gallonage permitted in that pile shall be the smallest of the 2 or more separate maximum gallonages.

NOTE 2: Aisles shall be provided so that no portable tank is more than 12 ft. from an aisle. Main aisles shall be at least 8 ft. wide and side aisles at least 4 ft. wide.

NOTE 3: Each pile shall be separated from each other by at least 4 ft.

(vi) **Flammable and combustible liquid warehouses or storage buildings.**
(a) If the storage building is located 50 feet or less from a building or line of adjoining property that may be built upon, the exposing wall shall be a blank wall having a fire-resistance rating of at least 2 hours.

(b) The total quantity of liquids within a building shall not be restricted, but the arrangement of storage shall comply with Table H-14 or H-15.

(c) Containers in piles shall be separated by pallets or dunnage where necessary to provide stability and to prevent excessive stress on container walls.

(d) Portable tanks stored over one tier high shall be designed to nest securely, without dunnage, and adequate materials handling equipment shall be available to handle tanks safely at the upper tier level.

(e) No pile shall be closer than 3 feet to the nearest beam, chord, girder, or other obstruction, and shall be 3 feet below sprinkler deflectors or discharge orifices of water spray, or other overhead fire protection systems.

(f) Aisles of at least 3 feet wide shall be provided where necessary for rea-

sons of access to doors, windows or standpipe connections.

(6) **Storage outside buildings—(i) General.** Storage outside buildings shall be in accordance with Table H-16 or H-17, and subdivisions (ii) and (iv) of this subparagraph.

TABLE H-16—OUTDOOR CONTAINER STORAGE

| 1—Class | 2—Maximum per pile | 3—Distance between piles | 4—Distance to property line that can be built upon | 5—Distance to street, alley, public way |
|---------|--------------------|--------------------------|--|---|
| | gallons | feet | feet | feet |
| IA | 1,100 | 5 | 20 | 10 |
| IB | 2,200 | 5 | 20 | 10 |
| IC | 4,400 | 5 | 20 | 10 |
| II | 8,800 | 5 | 10 | 5 |
| III | 22,000 | 5 | 10 | 5 |

NOTE 1: When 2 or more classes of materials are stored in a single pile, the maximum gallonage in that pile shall be the smallest of the 2 or more separate gallonages.

NOTE 2: Within 200 ft. of each container, there shall be a 12-ft. wide access way to permit approach of fire control apparatus.

NOTE 3: The distances listed apply to properties that have protection for exposures as defined. If there are exposures, and such protection for exposures does not exist, the distances in column 4 shall be doubled.

NOTE 4: When total quantity stored does not exceed 50 percent of maximum per pile, the distances in columns 4 and 5 may be reduced 50 percent, but not less than 3 ft.

(ii) **Maximum storage.** A maximum of 1,100 gallons of flammable or combustible liquids may be located adjacent to buildings located on the same premises and under the same management provided the provisions of subdivisions (a) and (b) of this subdivision are complied with.

(a) [Reserved]

(b) Where quantity stored exceeds 1,100 gallons, or provisions of subdivision (a) of this subdivision cannot be met, a minimum distance of 10 feet between buildings and nearest container of flammable or combustible liquid shall be maintained.

(iii) **Spill containment.** The storage area shall be graded in a manner to divert possible spills away from buildings or other exposures or shall be sur-

rounded by a curb at least 6 inches high. When curbs are used, provisions shall be made for draining of accumulations of ground or rain water or spills of flammable or combustible liquids. Drains shall terminate at a safe location and shall be accessible to operation under fire conditions.

(iv) **Security.** The storage area shall be protected against tampering or trespassers where necessary and shall be kept free of weeds, debris and other combustible material not necessary to the storage.

(7) **Fire control—(i) Extinguishers.** Suitable fire control devices, such as small hose or portable fire extinguishers, shall be available at locations where flammable or combustible liquids are stored.

TABLE H-17—OUTDOOR PORTABLE TANK STORAGE

| 1—Class | 2—Maximum per pile | 3—Distance between piles | 4—Distance to property line that can be built upon | 5—Distance to street, alley, public way |
|---------|--------------------|--------------------------|--|---|
| | gallon | feet | feet | feet |
| IA | 2,200 | 5 | 20 | 10 |

CONTAINER RECEIVING AND MAINTENANCE PROCEDURE

When a shipment of hazardous waste is being received by our branch, the following procedure will be followed:

Receiving tickets must be issued upon receipt. In addition to the normal information required on the receiving ticket, be sure to indicate:

1. "Hazardous Waste Material".
2. The hazardous waste manifest number.

The receiving clerk will be presented with a minimum of three copies of the Hazardous Waste Manifest. The receiving clerk will:

1. Verify that all required information is included on the manifest.
2. Verify that all items are received and initial each item on the manifest.
3. Enter the date received and the receiving ticket number in the identification Section for the TSDF.
4. If all items are in order, sign the manifest in the space provided for the TSDF.
5. Any discrepancies should be brought to the transporter and Operations Manager's attention. If the discrepancy cannot be resolved, the load is to be refused.
6. Return a signed copy to the transporter (other than DSW, Inc: .
7. Attach white and yellow copies of the receiving ticket to the TSDF copy.
8. Turn in all manifest copies and attached receiving ticket to the office at the end of each work day.

REVISED
SEPT. 22, 1986

CONTAINER RECEIVING AND MAINTENANCE PROCEDURE

Page 2.

Immediately stencil the receiving ticket number on each drum.

Physically check all bungs and openings to insure tightness.

Inspect each drum for leaks, bulges, extreme corrosion;

NOTE: If any deficiencies are found, effect container transfer procedure.

Remove to storage location in accordance with DSW, Inc.

Compatibility Storage program.

All containers are now subject to weekly inspections.

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SEPT. 22, 1986

DSW, Inc. :

Secondary Containment System Design and Operation

All 55-gallon steel containers which will be utilized to store off-site generator's waste materials at the DSW, Inc. storage facility will be held pending reshipment in a designated secondary containment area.

The secondary containment area to be utilized at this DSW, Inc. branch will be located along the approximate center of the west wall of the major warehouse room. It will be a rectangle 19 feet by 25 feet, the long side of which is parallel to the wall, and will be separated from the rest of the warehouse by a 3.5-inch berm on three sides, with the warehouse wall serving as the fourth side. The 475 square feet so enclosed will provide space for two rows of 6 pallets each along the wall, plus a ten foot aisle for forklift maneuvering. With double stacking of pallets, each holding four drums, storage for 88 drums is easily provided. The floor of the area is free from cracks, holes, and gaps, and the berm is integrally bound to the concrete floor to prevent leakage or seepage.

The volume of containment area provided by this design provides for an accidental spillage or leakage equal to 10% of the maximum gallonage stored. For 96 55-gallon drums, the maximum volume of

10/11/5
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SEPT. 22, 1966

spent solvents is 5280 gallons. Ten per cent of this figure is 528 gallons, while the proposed storage volume provides 873 gallons:

$$19 \text{ feet} \times 25 \text{ feet} \times 3.5 \text{ inches} = 138.5 \text{ cubic feet}$$

$$1 \text{ cubic foot} = 7.48 \text{ gallons}$$

$$138.5 \text{ cubic feet} \times 7.48 \text{ gallons/cu. ft.} = 1036 \text{ gallons.}$$

However, in addition to the provision for spillage or leakage, the pallets on the floor will occupy volume:

| <u>Component</u> | <u>Dimensions(in.)</u> | <u>Quantity</u> | <u>Cubic Inches</u> | <u>Cubic Feet</u> |
|-----------------------------|------------------------|-----------------|---------------------|-------------------|
| Deckboards | 48 x 6 x 1 | 8 | 2304 | 1.33 |
| Stringers | 48 x 1 7/8 x 3 5/8 | 3 | 847 | <u>.49</u> |
| Total Cubic Feet per Pallet | | | | 1.82 |

$$1.82 \times 7.48 \text{ gal./cu.ft.} \times 12 \text{ pallets} = 163 \text{ gallons.}$$

The 1036 gallons above would be reduced by the 163 gallons needed for the pallets thus providing (1036 - 163) 873 gallons net storage.

Should any spill or leakage be apparent in this area, it will be absorbed onto an inert substance and the contaminated material then be collected in an open-head drum and disposed of at a suitable permitted facility.

Since all containers while in storage would remain on a wooden pallet, there would be not contact between the drums and any spilled or leaked material.

Since the storage area would be indoors, there is no problem of stormwater run-on or run-off.

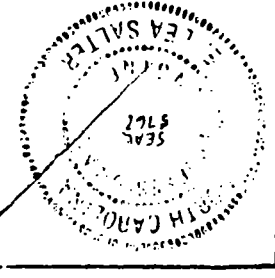
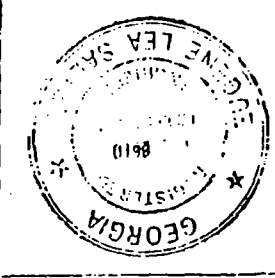
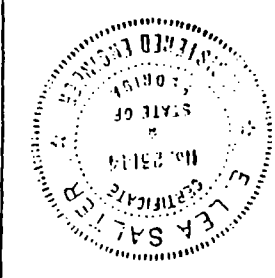
An engineering drawing of the proposed secondary containment area prepared by a Florida-licensed engineer follows.

REVISED
SEPT. 22, 1986

The base of the containment area where the waste is stored -- the warehouse floor -- is concrete, free of cracks and breaks.

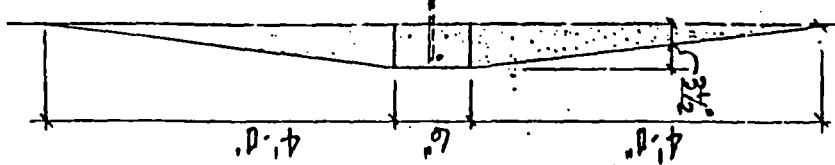
Concrete is acknowledged to be resistant to all neutral organic solvents, both halogenated and non-halogenated. This has been verified in recent discussions with DSW, Inc.'s largest vendor of such products. As a matter of fact, DSW, Inc. over the past few years has steadily replaced asphalt paving with concrete in its regular yard storage areas (and has installed concrete in all new yard areas) because of concrete's resistance to organic solvents compared to that of bituminous materials. An unlikely problem can be envisioned in the sense that an aged halogenated solvent containing water (in the absence of the inhibitors normally added to such solvents) could generate hydrochloric acid which can attack concrete, but any significant or perhaps even observable deterioration would require a substantial time period (months). This situation would not be expected to arise at a waste storage area such as is being considered in these pages because of the short time (days) any container of spent solvent would be expected to remain at the branch and the constant inspection of the integrity of the secondary containment area. Moreover, a sufficient acidity to be considered corrosive (less than pH of 2 as defined in 40 CFR 261.22) would be caught at the time of the submission of the generator's analytical data and [REDACTED] Spent Material/Waste Product Survey Form which calls for the pH of the proffered material.

~~DSW, Inc.'s predecessor, McKesson Chemical Company.~~

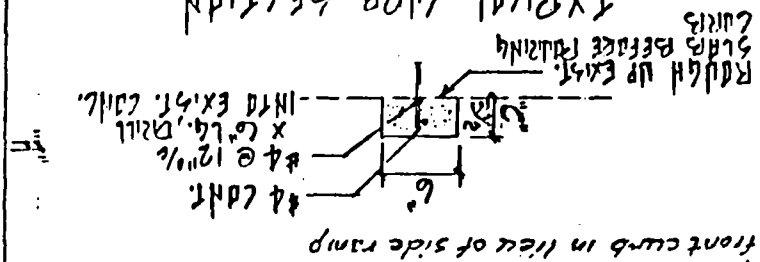


Notes 1, 2 added - 6/11/84

SECTION 100 RAMP



TYPICAL CURB SECTION



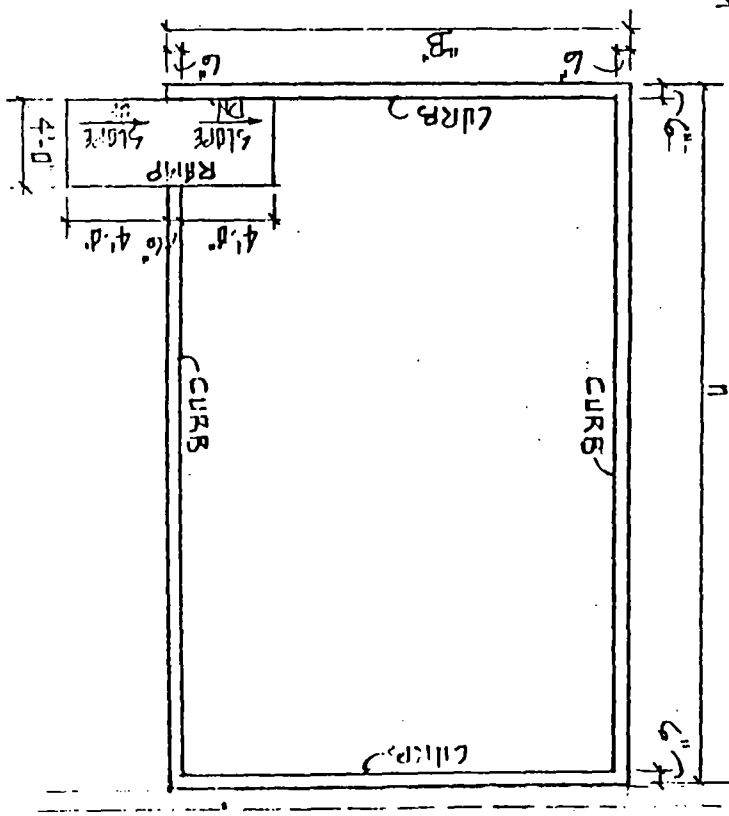
Seal joints with silicone at walls, expansion joints
 Alternate 2 - Pour 12" x 3 1/2" rounded
 front curb in lieu of side ramp

| | | | | |
|--------|----|----|----|-------|
| PAVING | 18 | 21 | 19 | 3 1/2 |
| | 24 | 25 | 19 | 3 1/2 |
| | 26 | 29 | 19 | 3 1/2 |
| | 28 | 33 | 19 | 3 1/2 |
| | 32 | 37 | 19 | 3 1/2 |

STANDARD 51235

ENCLOSURE STORAGE AREA FOR HAZARDOUS WASTE TANKS
 DSW, Inc.

STORAGE PLAN



DSW, Inc.,

Prevention of Ignition

A DSW, Inc., storage facility handles materials in waste form from off-site generators who wish to employ the Company's recycling capabilities. This site functions as a temporary storage and transfer point for accumulating economic truckloads to make it economically feasible to reship these materials the distance involved in getting to the recycling centers.

Some of the materials handles in waste form at this facility are expected to fall into the category of an ignitable. This facility will not handle any materials which would be classified as a reactive or incompatible waste. All waste materials are stored in the designated waste storage area indicated on the facility diagram.

All containers (drums) utilized for shipments of waste materials are of proper specifications as outlined in the section entitled "Containers Management" to contain, store, and transport the materials handled. All containers of waste material are tightly closed while in storage. It is DSW, Inc., policy that no smoking is allowed in any areas of the facility other than office and breakroom areas. "No Smoking" and "Danger-Unauthorized Personnel Keep Out" signs are prominently posted. Personnel are instructed and familiar with the required precautions which must be exercised when working around ignitable materials such as the use

of spark proof tools, elimination of possible ignition sources, etc.

In the event that a leaking container is discovered and requires transfer while in storage at this site, only new, unused containers of the proper specification for the material will be utilized.

Containers of ignitable wastes while present at this facility are handled with the respect they deserve in order to minimize the possibility for fire or explosion. All containers are kept tightly sealed and are in good condition (including proper labelling and marking) prior to the driver's accepting them at the generator's facility in the first place. Drums are placed on wooden pallets and remain on these pallets while in storage. Pallets of waste materials while in storage in the designated hazardous waste storage area are typically stacked two high. Stacks will be maintained in a neat manner with no overhang or leaning. Only good quality wooden pallets are used. The designated hazardous waste storage area is more than 50 feet from the facility property lines as required.

Wastes handled by this branch for recycling are compatible with each other in that when combined they do not cause a reaction. All wastes are separated by a curb from all other chemicals and solvents in the general area; incompatibilities are, therefore, not a factor.

DSW, Inc.

Inspection Schedules

As a result of DSW, Inc. ; being only a distributor of chemicals (no manufacturing, no processing), any of its facilities will employ only a limited variety of equipment in its daily business. Because of the type of activity undertaken, the inspection activity required is low in comparison to that required in a processing or manufacturing environment. However, a number of regular and routine inspections are carried out on that equipment involved in the day's business. Also, routine inspections are conducted on safety equipment which might be required in emergency situations to ensure that these items will be accessible and ready if a situation occurs. Inspections center upon evaluation of equipment for possible malfunctions, structural deterioration, operator errors, and unintentional discharges which could affect the environment or threaten human health.

The appended Table lists the items which are routinely inspected and the types of problems which could be present or cause an item to be non-functional as well as the frequency with which the items are inspected. In addition to these inspections, which are routinely carried out by branch personnel,

DSW, Inc. has other Company personnel not stationed at the facility conduct a "Safety Audit" of the operation on a quarterly basis. This policy has been in place since 1978 and entails either the branch's District Manager or

a member of the Regional Operations Department Staff's visiting the branch for what typically is a full day to inspect and evaluate the facility in approximately 180 areas pertaining to safety and operating procedures. Examples of areas checked are:

- | | |
|--|---|
| 1. Office area | 8. Warehouse & dock areas |
| 2. Drivers' records | 9. Yard area |
| 3. Fire protection | 10. Transportation |
| 4. Maintenance | 11. Physical layout & equipment |
| 5. Compliance with OSHA, RCRA, DOT, and other rules and regulations. | 12. General recordkeeping and control |
| 6. Security | 13. Compatibilities of stored materials |
| 7. Safety practices | 14. Waste management procedures |

Inspections of the hazardous waste container storage area will be conducted as outlined in Table 1. Results and documentation of any remedial actions which might be required will be recorded on an inspection log sheet which will include the item inspected, date, and time of inspection, name of inspector, observations, remedial action (if necessary), date repair completed (if required), and supervisor's signature. These logs are kept for three years at the branch.

If DSW, Inc. personnel during a routine inspection find that a condition of a non-emergency nature is present which requires some type of maintenance in order to bring that particular

article into compliance with standards, it shall be that employee's responsibility either to bring the item into compliance or to bring it to the facility management's attention for correction of the deficiency. All remedial actions are undertaken at the earliest possible time in order to eliminate potential for further deterioration of equipment, and to resolve an unsafe condition.

If during an inspection a situation would be found which is of an emergency nature, or has the potential to become one, the employee shall immediately initiate remedial action, and will notify the Emergency Coordinator who shall carry out his/her actions as outlined in the Contingency Plan. As outlined in the Contingency Plan, in the event of a release of a hazardous material it shall be the objective to contain, isolate, clean-up, and decontaminate the affected area with the utmost concern for minimizing risk to Company workers, the public, and the environment. The clean-up material must then be properly disposed of and necessary documentation and reporting undertaken.

Table 1

DSW, Inc.,
Inspection Schedule
(To be kept at Branch)

| <u>Area/Equipment</u> | <u>Specific Items</u> | <u>Types of Problems</u> | <u>Frequency of Inspection</u> |
|--|----------------------------------|---|--|
| <u>Container Storage Area</u> (Secondary Containment) | General Area | Leaks, spills | Daily |
| | Container placement and stacking | Aisle space, stacking height, unstable stacks | Weekly |
| | Container integrity | Leaks, corrosion, bulging | Weekly |
| | Sealing of containers | Improper identification Date missing Illegibility | Weekly |
| | Base | Cracks, erosion | Daily |
| | Curb | Cracks, deterioration | Daily |
| | Warning signs | Damaged | Weekly |
| | Debris & refuse | Aesthetics | Weekly |
| | Accumulated liquid | Contamination | Daily, and confirm after precipitation if required |
| | Pallets | Broken boards, stringers | Weekly |
| <u>Security Devices</u> | Facility fence | Corrosion, damage | Weekly |
| | Main gate | Corrosion, damage, non-locking | Weekly |
| | Rail gate | Corrosion, damage, non-locking | Weekly |
| | Pedestrian gate | Corrosion, damage, non-locking | Weekly |

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SEPT. 22, 1986

Inspection Schedule
DSW, Inc.
Page 2.

| <u>Area/Equipment</u> | <u>Specific Items</u> | <u>Types of Problems</u> | <u>Frequency of Inspection</u> |
|---|---|----------------------------------|--------------------------------|
| <u>Loading, Unloading Areas</u> | Surface areas | Deterioration, spills | Daily |
| | Dock bumpers | Damage | Daily |
| <u>Safety & Emergency Equipment</u> | Emergency shower & eye wash | Water pressure, leaks, drainage | Weekly |
| | Industrial absorbent | Less than 5 bags | Monthly/ as needed |
| | Overpack drums | Less than 2 drums | Weekly |
| | Face shields | Broken or dirty | Monthly/ as needed |
| | Chemical cartridge respirators with cartridges for organic solvents | Less than | Monthly/ as needed |
| | Portable pump | Power, clogging | Monthly |
| | Fire extinguishers | Recharging | After each use |
| | Fire alarm systems | Power failure | Monthly |
| | Telephone system | Power failure | Daily |
| | Emergency lighting system | Battery failure | Monthly |
| | First aid equipment and supplies | Items missing per inventory list | Weekly |
| | Protective clothing | Holes, wear & tear | As used |
| | Pump hoses | Cracks, holes | Weekly |
| | Shovels | Missing; should be two | Weekly |
| | Miscellaneous hand tools | Lost, non-functional | Weekly |

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SEPT. 22, 1986

Inspection Schedule
DSW, Inc.
Page 3.

| <u>Area/Equipment</u> | <u>Specific Items</u> | <u>Types of Problems</u> | <u>Frequency of Inspection</u> |
|--|-----------------------|--------------------------|--------------------------------|
| <u>Safety & Emergency Equipment (cont'd)</u> | Brooms | Missing, should be two | Weekly |
| | Sprinkler System | | |
| | Flashlights | Batteries dead | Monthly |
| | Fire wall | Integrity | Monthly |

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DSW, Inc.
Closure Plan

This section outlines the steps which the subject DSW, Inc. branch will follow in a closure situation in order to comply with applicable sections of the Resource Conservation and Recovery Act.

Because this branch functions as only an accumulation and transfer point for containerized spent solvents destined for recycling at an off-site facility, partial closure is not relevant. Because the accumulation and transfer of materials which may be classified as hazardous wastes is but a small portion of the total business at this facility, and due to the fact that this hazardous wastes activity is the sole reason for DSW, Inc. being involved in the requirements of this legislation, there exist no partial closure situations. This facility, as it pertains to hazardous waste management activities, is either active or totally inactive as a storage facility.

It should be further noted that because of the nature of the hazardous wastes activity at this facility - only the accumulation and temporary storage of spent solvents in drums until economic truckloads can be shipped to a recycling facility - a post-closure plan is not required.

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DSW, Inc. will maintain a copy of this closure plan at the branch. The Company is aware that should this branch contemplate closure of the site, the EPA Regional Administrator and the comparable state agency must be notified at least 180 days prior to the date that the Company begins to close the facility.

The maximum number of drums in storage at any one time - the number assumed to be in inventory at the time of closure - will be 90.

DSW, Inc. will continue to operate a business at this facility as long as it is deemed economically viable by the Company; an "anticipated" date of closure is established as 2004 (in twenty years).

The Company is aware that upon completion of closure, it shall be required to submit to the Regional EPA Administrator and the comparable state agency a certification by both [REDACTED] Inc. and an independent registered professional engineer that the facility has been closed in accordance with the outlined proceedings contained in the approved Closure Plan.

In practice, once DSW, Inc. decided to close this site as a hazardous waste storage facility, the required 180-day notice period required by the EPA would be filed and notices sent to customers (the generators) employing [REDACTED] Inc. services

to inform them of the pending discontinuation of receiving their spent solvents. All materials would be removed from the site within 30 days of receipt of the final volume of waste and total closure activities will be completed with 120 days.

Although all waste in storage would be economically recoverable material and consequently would be expected to be transferred upon closure to a recycling facility for the purpose of closure cost calculation the most expensive case - payment to an outside permitted facility for outright disposal of the maximum inventory - has been used. No credit is taken for recoverable values of the spent solvents. A copy of a letter from a major permitted disposal facility agreeing to receive any inventory of spent solvents from DSW, Inc. is appended.

No pretreatment would be required before material would be ready for shipment. Prior to being loaded, all drums would be inspected for leakage, damage, and proper labelling. They would be transported on pallets to a staging area by conventional forklift handling and then placed in trucks for transport. Proper manifest forms would be prepared for each movement.

Because this facility functions strictly as a storage facility, with no treatment or disposal at this location, decontamination activities

would not be anticipated to be necessary. However, if the storage area's history or an accident or spill during closure required decontamination, any significant amount of waste solvent (if any) would be absorbed on an inert material. In addition, the area and any contaminated auxiliary equipment used would be steam-cleaned to the point where no contaminant can be detected. The branch has a source of steam available in the warehouse near the secondary containment area; if it is used to clean this space, the condensate would be contained within the curbed area and then would be absorbed an/or pumped out. Any large equipment, such as forklift blades, would be cleaned inside the curbed area and, again, the condensate collected. Portable equipment, such as shovels, would be placed inside a metal drum and steam-cleaned and the condensate collected.

All condensate from such steam-cleaning, any used absorbent material, and any contaminated wood pallets or other material to be discarded would be considered a hazardous waste. It would be collected in a secure container and transported to a permitted hazardous waste disposal facility under a hazardous waste manifest.

Because of the remoteness of the secondary containment area relative to any earth, no decontamination of soil or earth is envisioned during closure.

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SEPT. 22, 1986

DSW, Inc.

Closure Plan
Page 5.

A schedule of the closure steps is depicted on the appended graph.

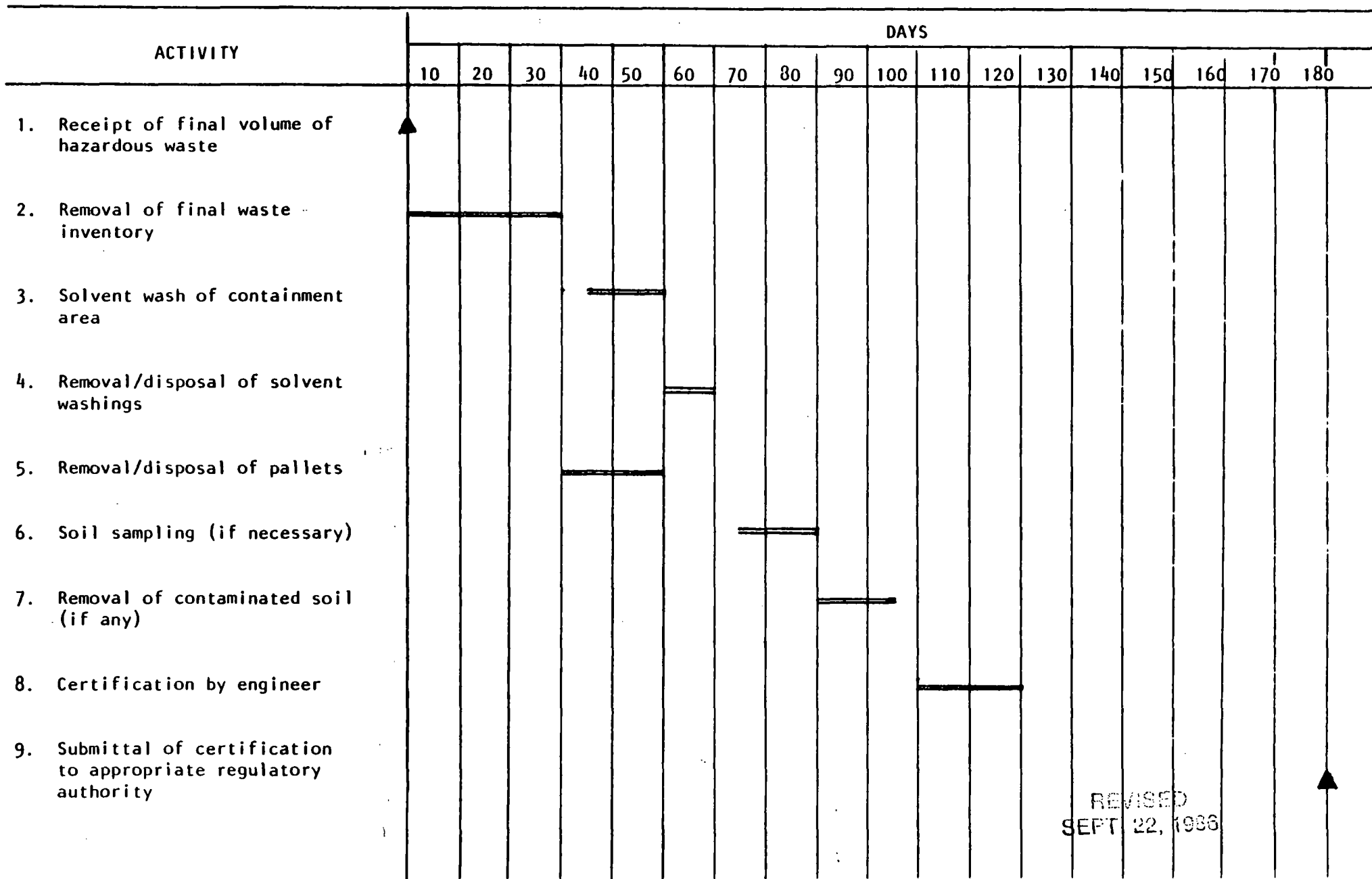
After closure, it is expected that the containment area will revert to general warehouse usage.

This closure plans and the following cost estimate will be kept on file at the DSW, Inc. facility. It will be revised and resubmitted whenever a change in the closure plan affects the cost of closure. It will be reviewed and adjusted annually to reflect changes in closure cost brought about by inflation, utilizing published indices.

REVISED
SEPT. 22, 1986

Tampa, Florida Branch

ANTICIPATED CLOSURE SCHEDULE



REVISED
SEPT 22, 1986

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

Comments

Street or P.O. Box

City or Town _____

Street or Route Number

City or Town

Name and Title (last, first, and job title)

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

A. Hazardous Waste Activity

☐ **A. Utility Boiler**

☐ B. Industrial Boiler

☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter "X" in the appropriate box(es))

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

| ID — For Official Use Only | | | | | | | | | | | | | |
|----------------------------|--|--|--|--|--|--|--|--|--|--|--|-----|---|
| C | | | | | | | | | | | | T/A | C |
| W | | | | | | | | | | | | | 1 |

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

| | | | | | |
|--------------|--------------|--------------|--------------|--------------|--------------|
| 1 F 0 0 1 | 2 F 0 0 2 | 3 F 0 0 3 | 4 F 0 0 5 | 5 D 0 0 1 | 6 T 0 0 1 |
| 7 | 8 | 9 | 10 | 11 | 12 |

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

| | | | | | |
|----|----|----|----|----|----|
| 13 | 14 | 15 | 16 | 17 | 18 |
| 19 | 20 | 21 | 22 | 23 | 24 |
| 25 | 26 | 27 | 28 | 29 | 30 |

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

| | | | | | |
|----|----|----|----|----|----|
| 31 | 32 | 33 | 34 | 35 | 36 |
| 37 | 38 | 39 | 40 | 41 | 42 |
| 43 | 44 | 45 | 46 | 47 | 48 |

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

| | | | | | |
|----|----|----|----|----|----|
| 49 | 50 | 51 | 52 | 53 | 54 |
|----|----|----|----|----|----|

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable
(D001)


☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☒ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted 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.

| | | |
|--|--|--------------------------------------|
| Signature  | Name and Official Title (type or print) MARK HOOPER, PRESIDENT | Date Signed SEPT. 22, 1986 |
|--|--|--------------------------------------|

DSW, INC.
1600 NORTON BUILDING
SEATTLE, WASHINGTON 98104
TELEPHONE (206) 447-5909

RECEIVED

SEP 25 1986

Hazardous waste

September 25, 1986

Diane Hunt
Florida Dept. of Environmental
Regulations
2600 Blair Stone Road
Twin Towers Building, Room 421
Tallahassee, FL 32301

Re: EPA I.D. No. FLD020985727
McKesson - Tampa
Request for Transfer of Interim Status/Permit

Dear Ms. Hunt:

Accompanying this letter is an application by DSW, Inc., a Washington corporation ("DSW"), for the transfer to DSW of the hazardous waste storage permit or interim status standing referenced above which is now held by McKesson Chemical Company, a division of McKesson Corporation ("McKesson Chemical"). Also enclosed are fully executed Form(s) 8700-12 whereby the generator and transporter numbers assigned to the above facilit(ies) would be reassigned to DSW.

DSW has entered into an Asset Purchase and Sale Agreement dated as of September 19, 1986 (the "Agreement") whereby DSW will acquire substantially all of the assets of McKesson Chemical, including the assets and business comprising the above facilit(ies). The Agreement provides that the hazardous waste storage permits, along with responsibility for complying with all applicable federal and state requirements, are to be transferred to DSW, subject, of course, to the approval of all applicable governmental agencies.

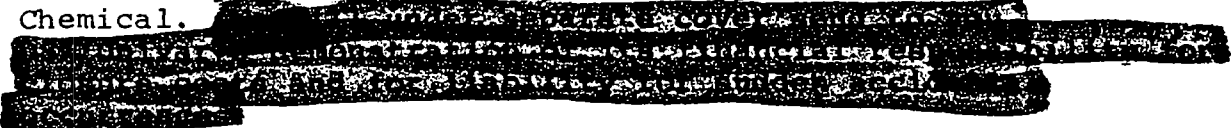
The closing of the acquisition (the "Closing") is scheduled to take place on October 24, 1986. We request that you process the accompanying application for transfer as soon as reasonably possible so that the transfer can take place concurrently with the closing. We request, however, that the final transfer not take place until you have been notified by us that the Closing has occurred.

September 25, 1986

Page 2

At the Closing, DSW will become a wholly-owned subsidiary of Univar Corporation, a Delaware corporation ("Univar"). DSW will operate its facilities under the name Van Waters & Rogers, which is an existing chemical distribution division of Univar. The common stock of Univar is listed on the New York Stock Exchange. Univar's Annual Report for the fiscal year ended February 28, 1986 is one of the documents accompanying this letter.

Following the Closing, the operations, policies and personnel at the above facilities will continue unchanged until DSW/Univar has completed an analysis of where changes should occur. Accordingly, we have based our application for transfer upon the previously-filed applications of McKesson Chemical.



In order to assist you in the requested transfer, we are enclosing an additional, highlighted, copy of the application(s), indicating where changes have been made from the application(s) which McKesson Chemical has on file with you in respect to the above facilit(ies). We hope that this procedure will enable you to expedite the processing of the transfer. We will, of course, comply with all applicable requirements for notification, modification of applications or permits, etc., should we make any substantial changes in the operations at the facility.


We have also included a letter from McKesson Chemical which confirms the execution of the Agreement and requests that McKesson Chemical's interim status standing or permit for the above facilit(ies) be transferred to DSW, subject to further notification that the Closing has taken place. McKesson Chemical acknowledges that it will continue to be responsible under the interim status standing or permit until the transfer has been officially approved by you. McKesson Chemical has advised DSW, Inc. in writing of the applicable law governing hazardous waste storage at the above facilit(ies).

September 25, 1986
Page 3

Throughout the period prior to the Closing, McKesson Chemical personnel will be cooperating with us in the transfer of the interim status or permit. A representative of DSW/Univar or McKesson Chemical will be calling you soon in order to confirm that this letter has been received by you and to determine whether you require any additional information in order to complete the transfer process.

Thank you very much for your early attention to this matter.

Very sincerely yours,


Mark Hooper
President

Enclosures

cc: RCRA Officer
U.S. EPA Region IV

McKesson

September 24, 1986

Diane Hunt
Florida Dept. of Environmental
Regulations
2600 Blair Stone Road
Twin Towers Building, Room 421
Tallahassee, FL 32301

Re: EPA I.D. No. FLD020985727
McKesson - Tampa
Request for Transfer of Interim Status/Permit

Dear Ms. Hunt:

McKesson Chemical Company hereby requests that you commence the process of transferring its interim status standing and/or modify its outstanding hazardous waste storage permit(s) for the above facilit(ies) so as to indicate that DSW, Inc., a Washington corporation ("DSW") is the owner or operator of such facilit(ies), effective at such time as you have been notified that the Closing described below has occurred. We also request that you transfer the generator and transporter identification numbers for the above facilit(ies) to DSW, effective as of the date you are notified that the Closing has occurred. This letter is being submitted concurrently with the applications of DSW for such modification(s) and such transfers.

McKesson Corporation, a Maryland corporation of which McKesson Chemical Company is a division, has entered into an Asset Purchase and Sale Agreement dated as of September 19, 1986 (the "Agreement") whereby McKesson Corporation will sell substantially all of the assets and business of McKesson Chemical Company to DSW. DSW will be a wholly-owned subsidiary of Univar Corporation, a Delaware corporation. The Agreement provides that the hazardous waste storage permits, along with responsibility for complying with all applicable federal and state requirements, are to be transferred to DSW, subject, of course, to the approval of all applicable governmental agencies.

The closing of the sale (the "Closing") is currently scheduled to take place on October 24, 1986. We are asking you to begin as soon as you conveniently can to process the accompanying application for transfer, however we also request that the transfer not take place until you have been notified by us that the Closing has occurred.

Thank you very much for your attention to this matter.

Very sincerely yours,

Jon W. d'Alessio
Vice President
McKesson Chemical Group

Enclosures

cc: RCRA Officer
U.S. EPA Region IV

| ID — For Official Use Only | | | | | | | | | | | | | | | | |
|----------------------------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|-----|---|
| C | | | | | | | | | | | | | | | T/A | C |
| W | | | | | | | | | | | | | | | | 1 |

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

| | | | | | |
|---|---|---|----|----|----|
| 1 | 2 | 3 | 4 | 5 | 6 |
| | | | | | |
| 7 | 8 | 9 | 10 | 11 | 12 |
| | | | | | |

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

| | | | | | |
|----|----|----|----|----|----|
| 13 | 14 | 15 | 16 | 17 | 18 |
| | | | | | |
| 19 | 20 | 21 | 22 | 23 | 24 |
| | | | | | |
| 25 | 26 | 27 | 28 | 29 | 30 |
| | | | | | |

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary. **See attachment**

| | | | | | |
|---------|---------|---------|---------|---------|---------|
| 31 | 32 | 33 | 34 | 35 | 36 |
| U 0 0 2 | U 2 2 6 | U 2 1 0 | U 2 2 8 | U 0 3 1 | U 0 5 7 |
| 37 | 38 | 39 | 40 | 41 | 42 |
| U 0 6 9 | U 1 1 2 | U 1 2 2 | U 1 5 4 | U 1 5 9 | U 1 6 1 |
| 43 | 44 | 45 | 46 | 47 | 48 |
| U 2 2 0 | U 2 3 9 | | | | |

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

| | | | | | |
|----|----|----|----|----|----|
| 49 | 50 | 51 | 52 | 53 | 54 |
| | | | | | |

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

☒ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted 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.

Signature

Mark Hooper

Name and Official Title (type or print)

MARK HOOPER, PRESIDENT

Date Signed

SEP. 11 1999

TABLE OF CONTENTS

Tampa, Florida

| | <u>TAB</u> |
|--|------------|
| Preamble | 1 |
| Certification | 2 |
| Part A Application (40 CFR 270.13) | 3 |
| Part B: Topographic Map and Location Information | 4 |
| Part C: Land Use | 5 |
| Part D: | |
| (1) General Description of Facility | 6 |
| (2) Chemical and Physical Analyses | 7 |
| (3) Waste Analysis Plan | 8 |
| (4) Traffic Pattern | 9 |
| (5) Security | 10 |
| (6) Contingency Plan | 11 |
| (7) Procedures and Equipment | 12 |
| (8) Preparedness and Prevention | 13 |
| (9) Training Program | 14 |
| (10) Closure Cost Estimates | 15 |
| (11) Financial Responsibility | 16 |
| 40 CFR 270.15(a) | |
| (12) Containment and Container Practices | 17 |
| (13) Prevention of Ignition and Reaction | 18 |
| (14) General Inspection Schedule | 19 |
| (15) Closure Plan | 20 |
| Appendix: RCRA Compliance -- Administrative | 21 |

PREAMBLE

DSW, Inc., a Washington corporation headquartered at 1600 Norton Building, Seattle, Washington 98104, will acquire this facility on or about October 24, 1986. At the time of acquisition, DSW, Inc. will be a wholly-owned subsidiary of Univar Corporation, a Delaware corporation. DSW, Inc. will operate this facility under the name Van Waters & Rogers. Van Waters & Rogers is the chemical distribution division of Univar Corporation.

The procedures, policies, and personnel in place for McKesson Chemical Company, including the existing arrangement between this facility and McKesson EnviroSystems for waste analysis and recycling, will be maintained pending further review by the new owner. No material changes in these aspects of the operations which require prior notification to appropriate agencies shall be made until such notification has been made and/or other appropriate approvals obtained in accordance with all applicable laws, rules, and regulations.

Unless indicated otherwise, employee training conducted prior to October 24, 1986 was conducted by McKesson Chemical Company. DSW, Inc. has retained the McKesson Chemical training personnel and will continue to use the McKesson Chemical training program.

This permit application is identical to that originally submitted by McKesson Chemical Company except for facility name and ownership changes. Site personnel lists and closure cost estimates have also been updated.

Prior correspondence by McKesson Chemical Company which is relevant to this revised application, such as contingency plan letters and the most recent closure cost updates, is included in this application. All existing agreements relevant to the Contingency Plan will be maintained. The appropriate agencies are being notified of this change in ownership. Original maps, drawings, etc. are on file with the agency and, since no changes to these documents are necessary, they have not been resubmitted in this application.

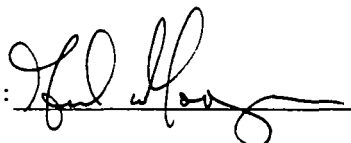
Tampa, Florida
FLD020985727

DSW, Inc.
Certification
(40 CFR Sec. 122.6(a)(d))

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on 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.

This statement applies to the filing in behalf of DSW, Inc.

Date: SEP 24 1999

Signature: 
Mark Hooper, President
DSW, Inc.

APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT
PART I - GENERAL
TO BE COMPLETED BY ALL APPLICANTS

Please Type or Print

A. GENERAL INFORMATION

1. TYPE OF FACILITY:

| | | | | | |
|------------|-------------------------------------|----------------|--------------------------|---------------------|--------------------------|
| DISPOSAL | <input type="checkbox"/> | LAND TREATMENT | <input type="checkbox"/> | SURFACE IMPOUNDMENT | <input type="checkbox"/> |
| LANDFILL | <input type="checkbox"/> | | | | |
| STORAGE | <input checked="" type="checkbox"/> | TANKS | <input type="checkbox"/> | PILES | <input type="checkbox"/> |
| CONTAINERS | <input checked="" type="checkbox"/> | | | SURFACE IMPOUNDMENT | <input type="checkbox"/> |
| TREATMENT | <input type="checkbox"/> | INCINERATION | <input type="checkbox"/> | SURFACE IMPOUNDMENT | <input type="checkbox"/> |
| TANKS | <input type="checkbox"/> | PILES | <input type="checkbox"/> | | |
| THERMAL | <input type="checkbox"/> | CHEMICAL | <input type="checkbox"/> | PHYSICAL | <input type="checkbox"/> |
| | | | | BIOLOGICAL | <input type="checkbox"/> |

2. TYPE OF APPLICATION: ☐ TOP ☒ CONSTRUCTION ☐ OPERATION ☐ CLOSURE

3. DATE CURRENT OPERATION BEGAN (OR IS EXPECTED TO BEGIN): January 1, 1985

4. FACILITY NAME: VAN WATERS LANDFILL

5. EPA/DER I.D. NO.: FLD020985727

6. FACILITY LOCATION OR STREET ADDRESS: 6051 Highway 41A, South Tampa, Florida

7. FACILITY MAILING ADDRESS: Route 3 Box 498A Tampa FL 33619
STREET OR P.O. BOX CITY STATE ZIP

8. CONTACT PERSON: PERFECTED MANAGEMENT TELEPHONE: (813) 677-8414

TITLE: Branch Manager

MAILING ADDRESS: Route 3 Box 498A Tampa FL 33619
STREET OR P.O. BOX CITY STATE ZIP

9. OPERATOR'S NAME: McKesson Chemical Company TELEPHONE: (813) 677-8414

10. OPERATOR'S ADDRESS: 6051 Highway 41A, South Tampa FL 33619
STREET OR P.O. BOX CITY STATE ZIP

11. FACILITY OWNER'S NAME: McKesson Chemical Company s TELEPHONE: (813) 677-8414

12. FACILITY OWNER'S ADDRESS: 6051 Highway 41A, South Tampa FL 33619
STREET OR P.O. BOX CITY STATE ZIP

13. LEGAL STRUCTURE: ☒ CORPORATION ☐ NON-PROFIT CORPORATION ☐ PARTNERSHIP
☐ INDIVIDUAL ☐ LOCAL GOVERNMENT ☐ STATE GOVERNMENT ☐ FEDERAL GOVERNMENT
☐ OTHER

14. IF AN INDIVIDUAL, PARTNERSHIP, OR BUSINESS IS PERFORMED UNDER AN ASSUMED NAME, SPECIFY COUNTY AND STATE WHERE NAME IS REGISTERED. COUNTY: -- STATE --

15. IF A CORPORATION, INDICATE STATE OF INCORPORATION FL

16. IF AN INDIVIDUAL OR PARTNERSHIP, LIST OWNERS:

NAME: _____
 ADDRESS: _____
 STREET OR P.O. BOX CITY STATE ZIP
 NAME: _____
 ADDRESS: _____
 STREET OR P.O. BOX CITY STATE ZIP
 NAME: _____
 ADDRESS: _____
 STREET OR P.O. BOX CITY STATE ZIP
 NAME: _____
 ADDRESS: _____
 STREET OR P.O. BOX CITY STATE ZIP

17. SITE OWNERSHIP STATUS: ☐ OWNED ☐ TO BE PURCHASED ☐ TO BE LEASED _____ YEARS

☒ PRESENTLY LEASED: EXPIRATION DATE 9/15/2002 IF LEASED, GIVE:
 LAND OWNER'S NAME: _____
 LAND OWNER'S ADDRESS: _____
 STREET OR P.O. BOX CITY STATE ZIP

18. ENGINEER: E. Lea Salter REGISTRATION NO.: 23144
 ADDRESS: P. O. Box 5931 Spartanburg, SC 29304
 STREET OR P.O. BOX CITY STATE ZIP
 ASSOCIATED WITH: Christman and Parson, Inc.

19. FACILITY LOCATED ON INDIAN LAND: ☐ YES ☒ NO

20. EXISTING OR PENDING ENVIRONMENTAL PERMITS:

| NAME OF PERMIT | AGENCY | PERMIT NUMBER | DATE ISSUED | EXPIRATION DATE |
|-----------------|---------|---------------|-------------|-----------------|
| Hazardous Waste | Florida | -- | | |
| Transporter | DER | | | |
| | | | | |
| | | | | |
| | | | | |

B. SITE INFORMATION

- FACILITY LOCATION: COUNTY: Hillsborough NEAREST COMMUNITY: Tampa, Florida
 LATITUDE: 27° 52' 032" LONGITUDE 082° 23' 005"
- AREA OF FACILITY SITE (ACRES): Branch is 5.5 acres; storage facility is 400 sq. ft.
- ATTACH TOPOGRAPHIC MAPS WHICH SHOW ALL THE FEATURES INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.
- IS THE SITE LOCATED IN A 100-YEAR FLOOD PLAIN? ☒ YES ☐ NO
 ATTACH ALL INFORMATION INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.

APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT
PART I - GENERAL
TO BE COMPLETED BY ALL APPLICANTS

Please Type or Print

A. GENERAL INFORMATION

1. TYPE OF FACILITY:

| | | | | | |
|------------|-------------------------------------|----------------|--------------------------|---------------------|--------------------------|
| DISPOSAL | <input type="checkbox"/> | LAND TREATMENT | <input type="checkbox"/> | SURFACE IMPOUNDMENT | <input type="checkbox"/> |
| STORAGE | <input checked="" type="checkbox"/> | | | | |
| CONTAINERS | <input checked="" type="checkbox"/> | TANKS | <input type="checkbox"/> | PILES | <input type="checkbox"/> |
| | | | | SURFACE IMPOUNDMENT | <input type="checkbox"/> |
| TREATMENT | <input type="checkbox"/> | | | | |
| TANKS | <input type="checkbox"/> | PILES | <input type="checkbox"/> | INCINERATION | <input type="checkbox"/> |
| | | | | SURFACE IMPOUNDMENT | <input type="checkbox"/> |
| THERMAL | <input type="checkbox"/> | CHEMICAL | <input type="checkbox"/> | PHYSICAL | <input type="checkbox"/> |
| | | | | BIOLOGICAL | <input type="checkbox"/> |

2. TYPE OF APPLICATION: ☐ TOP ☒ CONSTRUCTION ☐ OPERATION ☐ CLOSURE

3. DATE CURRENT OPERATION BEGAN (OR IS EXPECTED TO BEGIN): January 1, 1985

4. FACILITY NAME: VAN WATERS & ROGERS -- Tampa

5. EPA/DER I.D. NO.: FLD020985727

6. FACILITY LOCATION OR STREET ADDRESS: 6051 Highway 41A, South Tampa, Florida

7. FACILITY MAILING ADDRESS: Route 3 Box 498A Tampa FL 33619
STREET OR P.O. BOX CITY STATE ZIP

8. CONTACT PERSON: Gene Rainwater TELEPHONE: (813) 677-8414

TITLE: Branch Manager

MAILING ADDRESS: Route 3 Box 498A Tampa FL 33619
STREET OR P.O. BOX CITY STATE ZIP

9. OPERATOR'S NAME: McKesson Chemical Company TELEPHONE: (813) 677-8414

10. OPERATOR'S ADDRESS: 6051 Highway 41A, South Tampa FL 33619
STREET OR P.O. BOX CITY STATE ZIP

11. FACILITY OWNER'S NAME: DSW, Inc. s TELEPHONE: (206) 447-5909

12. FACILITY OWNER'S ADDRESS: 1600 Norton Building Seattle Washington 98109 ,
STREET OR P.O. BOX CITY STATE ZIP

13. LEGAL STRUCTURE: ☒ CORPORATION ☐ NON-PROFIT CORPORATION ☐ PARTNERSHIP
☐ INDIVIDUAL ☐ LOCAL GOVERNMENT ☐ STATE GOVERNMENT ☐ FEDERAL GOVERNMENT
☐ OTHER

14. IF AN INDIVIDUAL, PARTNERSHIP, OR BUSINESS IS PERFORMED UNDER AN ASSUMED NAME,
SPECIFY COUNTY AND STATE WHERE NAME IS REGISTERED. COUNTY: -- STATE --

15. IF A CORPORATION, INDICATE STATE OF INCORPORATION Washington.

16. IF AN INDIVIDUAL OR PARTNERSHIP, LIST OWNERS:

NAME: _____
 ADDRESS: _____ STREET OR P.O. BOX _____ CITY _____ STATE _____ ZIP _____
 NAME: _____
 ADDRESS: _____ STREET OR P.O. BOX _____ CITY _____ STATE _____ ZIP _____
 NAME: _____
 ADDRESS: _____ STREET OR P.O. BOX _____ CITY _____ STATE _____ ZIP _____
 NAME: _____
 ADDRESS: _____ STREET OR P.O. BOX _____ CITY _____ STATE _____ ZIP _____

17. SITE OWNERSHIP STATUS: ☐ OWNED ☐ TO BE PURCHASED ☐ TO BE LEASED _____ YEARS

☒ PRESENTLY LEASED: EXPIRATION DATE 9/15/2002 IF LEASED, GIVE:
 LAND OWNER'S NAME: _____
 LAND OWNER'S ADDRESS: DSW, Inc. 1600 Norton Building Seattle Washington 98109
 STREET OR P.O. BOX _____ CITY _____ STATE _____ ZIP _____

18. ENGINEER: E. Lea Salter REGISTRATION NO.: 23144
 ADDRESS: P. O. Box 5931 Spartanburg, SC 29304
 STREET OR P.O. BOX _____ CITY _____ STATE _____ ZIP _____
 ASSOCIATED WITH: Christman and Parson, Inc.

19. FACILITY LOCATED ON INDIAN LAND: ☐ YES ☒ NO

20. EXISTING OR PENDING ENVIRONMENTAL PERMITS:

| NAME OF PERMIT | AGENCY | PERMIT NUMBER | DATE ISSUED | EXPIRATION DATE |
|-----------------|---------|---------------|-------------|-----------------|
| Hazardous Waste | Florida | -- | | |
| Transporter | DER | | | |
| | | | | |
| | | | | |
| | | | | |

B. SITE INFORMATION

- FACILITY LOCATION: COUNTY: Hillsborough NEAREST COMMUNITY: Tampa, Florida
 LATITUDE: 27° 52' 032" LONGITUDE 082° 23' 005"
- AREA OF FACILITY SITE (ACRES): Branch is 5.5 acres; storage facility is 400 sq. ft.
- ATTACH TOPOGRAPHIC MAPS WHICH SHOW ALL THE FEATURES INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.
- IS THE SITE LOCATED IN A 100-YEAR FLOOD PLAIN? ☒ YES ☐ NO
 ATTACH ALL INFORMATION INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.

B. SITE INFORMATION

TOPOGRAPHIC MAP - 1 INCH TO 2000 FEET

TOPOGRAPHIC MAP - 1 INCH TO 200 FEET

100-YEAR FLOODPLAIN DATA

B. SITE INFORMATION

1. FACILITY LOCATION: COUNTY: Hillsborough NEAREST COMMUNITY: Tampa, Florida
LATITUDE: 27° 52' 032" LONGITUDE 082° 23' 005"
2. AREA OF FACILITY SITE (ACRES): Branch is 5.5 acres; storage facility is 400 sq. ft.
3. ATTACH TOPOGRAPHIC MAPS WHICH SHOW ALL THE FEATURES INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.
4. IS THE SITE LOCATED IN A 100-YEAR FLOOD PLAIN? ☒ YES ☐ NO
ATTACH ALL INFORMATION INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.

| EPA I.D. NUMBER (enter from page 1) | | | | | | | | | | | | | FOR OFFICIAL USE ONLY | | | | | | | | | | | | |
|---|---------------------------------------|----|----|---------------------------------------|---------------------------------|--------------------------|----|----|----|---|----|----|-----------------------|----|--|--|--|--|--|--|--|--|--|--|--|
| W F L D 0 2 0 9 8 5 7 2 7 | | | | | | | | | | | | | W DUP | | | | | | | | | | | | |
| IV. DESCRIPTION OF HAZARDOUS WASTES (continued) | | | | | | | | | | | | | D. PROCESSES | | | | | | | | | | | | |
| WASTE NO. | A. EPA HAZARD. WASTE NO. (enter code) | | | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | 1. PROCESS CODES (enter) | | | | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) | | | | | | | | | | | | | | | |
| | 23 | 24 | 25 | | | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | | | | | | | | | | | |
| 1 | F | 0 | 0 | 1 | 1100 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 2 | F | 0 | 0 | 2 | 1100 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 3 | F | 0 | 0 | 3 | 1100 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 4 | F | 0 | 0 | 5 | 1100 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 5 | D | 0 | 0 | 1 | 550 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 6 | U | 0 | 0 | 2 | 550 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 7 | U | 0 | 7 | 5 | 550 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 8 | U | 0 | 8 | 0 | 550 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 9 | U | 1 | 4 | 0 | 550 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 10 | U | 1 | 5 | 4 | 1100 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 11 | U | 1 | 5 | 9 | 1100 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 12 | U | 2 | 1 | 0 | 550 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 13 | U | 2 | 2 | 0 | 550 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 14 | U | 2 | 2 | 6 | 1100 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 15 | U | 2 | 2 | 8 | 1100 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 16 | U | 2 | 3 | 9 | 550 | G | S | 0 | 1 | | | | | | | | | | | | | | | | |
| 17 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 18 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 22 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 23 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 24 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 25 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26 | | | | | | | | | | | | | | | | | | | | | | | | | |

HAZARDOUS WASTE TO BE
STORED AT TAMPA FACILITYIDENTIFICATION AND ANNUAL
QUANTITIES

C. LAND USE

ZONING

C. LAND USE INFORMATION

1. PRESENT ZONING OF THE SITE? Tract 1 - Light Industrial; Tract 2 - Heavy Commercial
2. IF A ZONING CHANGE IS NEEDED, WHAT SHOULD NEW ZONING BE? --
3. PRESENT LAND USE OF SITE Chemical Distributor -- Light Industrial

D. OPERATING INFORMATION

1. IS WASTE GENERATED ON SITE? ☐ YES ☒ NO LIST THE SIC CODES (4-DIGIT)
5161

B. SITE INFORMATION

TOPOGRAPHIC MAP - 1 INCH TO 2000 FEET

TOPOGRAPHIC MAP - 1 INCH TO 200 FEET

100-YEAR FLOODPLAIN DATA

B. SITE INFORMATION

1. FACILITY LOCATION: COUNTY: Hillsborough NEAREST COMMUNITY: Tampa, Florida
LATITUDE: 27° 52' 032" LONGITUDE 082° 23' 005"
2. AREA OF FACILITY SITE (ACRES): Branch is 5.5 acres; storage facility is 400 sq. ft.
3. ATTACH TOPOGRAPHIC MAPS WHICH SHOW ALL THE FEATURES INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.
4. IS THE SITE LOCATED IN A 100-YEAR FLOOD PLAIN? ☒ YES ☐ NO
ATTACH ALL INFORMATION INDICATED IN THE INSTRUCTION SHEET FOR THIS PART.

DSW, Inc.

Site Information - Topographic Maps

A U.S.G.S. 7.5-minute topographic map of the Tampa Quadrangle follows (full quadrangle with original of this application, photocopied segment with copies). Information requested is depicted except for

1. Floodplain area: accompanying segment of FIA map shows McKesson branch to lie on 100-year floodplain.
2. Legal boundaries of branch: defined on following page.

Similarly, a topographic map at a scale of 1 inch to 200 feet follows. The DSW, Inc. hazardous waste facility lies within the DSW, Inc. building identified on the map. Detail too fine to show on this map (access control, loading and unloading areas, hazardous waste unit) can be identified in the third map of this series - the branch site plan drawn by a Florida-certified engineer.

A wind rose for Tampa is included in this section; it was obtained from the U.S. National Climatic Center in Asheville, North Carolina.

REVISED
SEPT. 22, 1986

LEGAL DESCRIPTION

All that tract or parcel of land located in the County of HILLSBOROUGH, State of FLORIDA, described as follows:

TRACT NO. 1

A tract in Section 10, Township 30 South, Range 19 East, Hillsborough County, Florida, described as follows: From the Southeast corner of the Southwest 1/4 of the Southeast 1/4 of Section 10, run West along the South boundary of said Southwest 1/4 of the Southeast 1/4 of Section 10, a distance of 393.38 feet to a point on the Westerly right of way line of that certain road originally known as State Road No. 23 (subsequently known as State Road No. 41-A; not now a State Road); run thence Northwesterly along said Westerly right of way line along a curve to the right (radius -838.25 feet) a distance of 53.43 feet (chord 53.42 feet, chord bearing North 10°18'37" West) to a point of tangency; run thence North 8°40'12" West along said Westerly right of way line a distance of 942.69 feet; run thence North 8°25'45" West along said Westerly right of way line a distance of 238.93 feet; run thence North 8°27'29" West along said Westerly right of way line a distance of 328.74 feet; run thence North 4°19'04" West along said Westerly right of way line a distance of 405.52 feet; run thence Northerly along said Westerly right of way line along a curve to the left (radius 2217.0 feet) an arc distance of 301.47 feet (chord 301.23 feet, chord bearing North 8°12'30" West); run thence North 12°06'32" West along said Westerly right of way line a distance of 431.64 feet; run thence Northwesterly along said Westerly right of way line along a curve to the left (radius 546.11 feet) an arc distance of 242.76 feet (chord 240.74 feet, chord bearing North 24°50'29" West) to a point of beginning; From said point of beginning, continue Northwesterly along said Westerly right of way line along said curve (radius 546.11 feet) an arc distance of 184.33 feet (chord 183.48 feet, chord bearing North 47°14'51" West); run thence North 56°55'02" West along said Westerly right of way line a distance of 154.71 feet; run thence South 67°24'45" West a distance of 572.23 feet to a point on the Easterly right of way line of the Seaboard Coast Line Railroad; run thence South 22°35'15" East along said Easterly right of way line of the Seaboard Coast Line Railroad, parallel to and 65.0 feet Easterly of the centerline of the main track of said Seaboard Coast Line Railroad, a distance of 294.5 feet; run thence North 67°24'45" East a distance of 736.09 feet to the point of beginning.

TRACT NO. 2

A tract in Section 10, Township 30 South, Range 19 East, Hillsborough County, Florida, described as follows: From the Southeast corner of the Southwest 1/4 of the Southeast 1/4 of Section 10, run West along the South boundary of said Southwest 1/4 of the Southeast 1/4 of Section 10 a distance of 393.33 feet to a point on the Westerly right of way line of that certain road originally known as State Road No. 23 (subsequently known as State Road No. 41-A not now a State Road); run thence Northwesterly along said Westerly right of way line along a curve to the right (radius - 833.25 feet) a distance of 53.43 feet (chord 53.42 feet, chord bearing North 10°13'37" West) to a point of tangency; run thence North 8°40'12" West along said Westerly right of way line a distance of 942.69 feet; run thence North 8°25'45" West along said Westerly right of way line a distance of 238.93 feet; run thence North 8°27'29" West along said Westerly right of way line a distance of 328.74 feet; run thence North 4°19'04" West along said Westerly right of way line a distance of 405.52 feet; run thence Northerly along said Westerly right of way line along a curve to the left (radius 2217.0 feet) an arc distance of 301.47 feet (chord - 301.23 feet, chord bearing North 8°12'30" West); run thence North 12°06'32" West along said Westerly right of way line a distance of 431.64 feet; run thence Northwesterly along said Westerly right of way line along a curve to the left (radius 546.11 feet) an arc distance of 242.09 feet (chord 240.74 feet, chord bearing North 24°50'29" West); run thence North 56°55'02" West along said Westerly right of way line a distance of 154.71 feet to a point of beginning; From said point of beginning, continue North 56°55'02" West along said Westerly right of way line a distance of 1014.77 feet to a point on the Easterly right of way line of Seaboard Coast Line Railroad; thence departing from said road right of way line, run South 22°35'15" East along said Easterly right of way line of the Seaboard Coast Line Railroad, parallel to and 65.0 feet Easterly of the center line of the main track of said Seaboard Coast Line Railroad, a distance of 835.0 feet; run thence North 67°24'45" East a distance of 572.23 feet to the point of beginning.

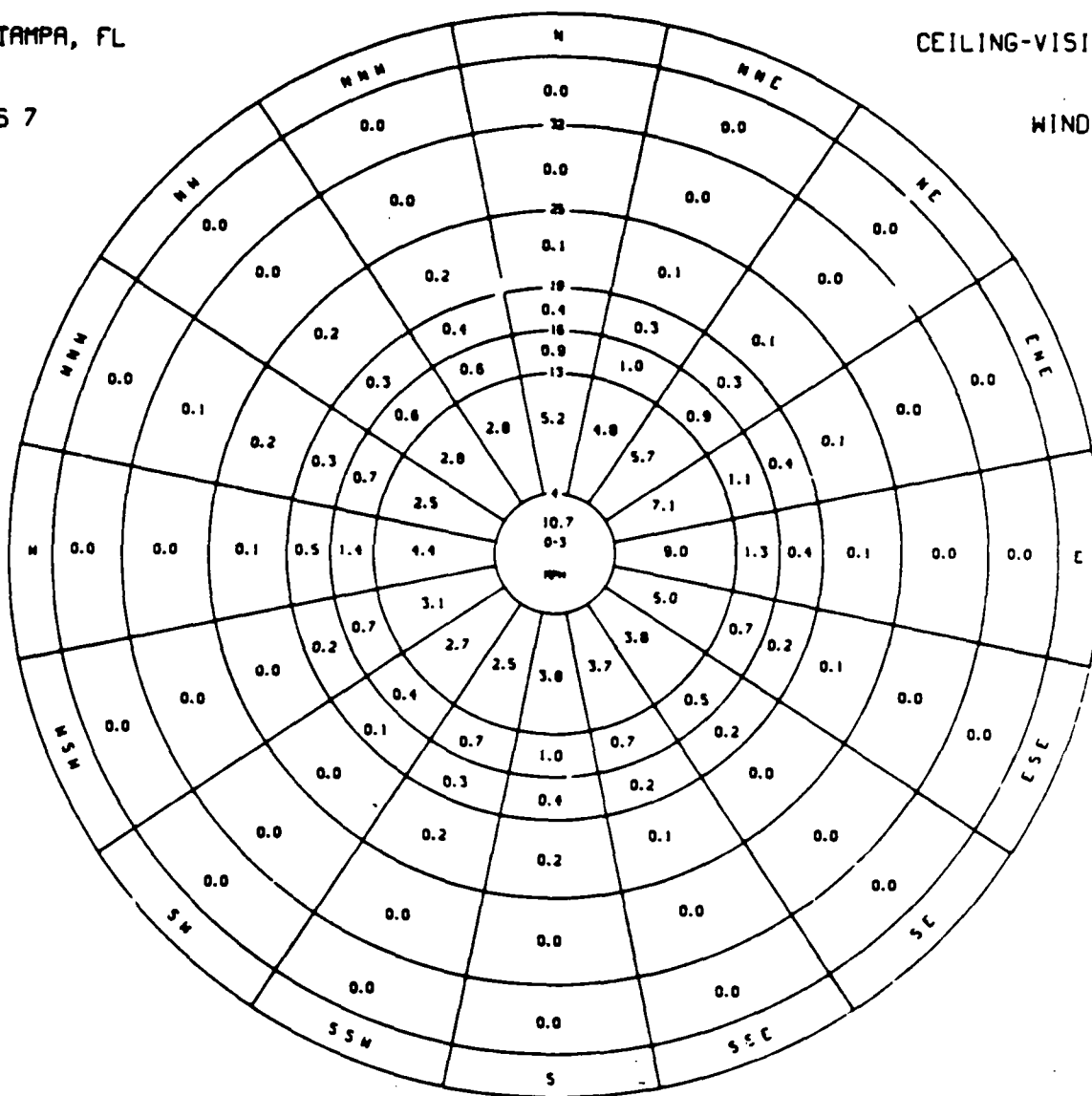
REVISED
SEPT. 22, 1986

TPA TAMPA, FL

CLASS 7

CEILING-VISIBILITY

WIND GRAPH



DSW, Inc.

Floodplain Information

The following FIA map shows this DSW, Inc. branch to lie in a 100-year floodplain. Consequently, a procedure has been developed to remove any hazardous wastes to safety in the event of an impending flood:

1. Responsibility for becoming aware of weather conditions that might lead to a flood condition lies with the Branch Manager, who is also the Emergency Coordinator for this branch. A weather forecast of 5 - 6 inches of rain within a 24-hour period will signal a possible flood condition. The Branch Manager will consult with the local National Weather Service station (645-2181; 645-2506) for any prediction of a flood, and, if indicated, for a projected time and elevation of a flood crest.
2. If a flood prediction is confirmed, arrangements will be made immediately to transfer all drums of hazardous waste to a permitted hazardous waste storage facility, such as Resource Recovery of America, Inc., in Mulberry, Florida (see appended letter).
3. Since no more than 90 drums of hazardous waste will be involved, less than two truckload movements will be required. A typical warning time for a 100-year flood, according to the U. S. Corps of Engineers, is 3 hours. No more than 45 minutes is required to load a truck.

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SEPT. 22, 1986

4. The branch owns its own tractors and trailers, and these would be made available within the warning time. In the event they were on the road and could not be returned in time, a national trucking firm permitted to handle hazardous wastes would be employed; Ryder P.I.E. and Thurston Motor Lines are familiar with DSW, Inc. If the emergency occurred on a weekend or a holiday, warehouse personnel can be brought to the branch in less than an hour. If no one can be located in the case of an impending emergency, the Branch Operations Manager, who is the alternate Emergency Coordinator, is qualified to operate a fork lift and to load the trucks.
5. The branch possesses a battery-operated radio for use in emergencies when power delivery is interrupted.

C. LAND USE

ZONING

C. LAND USE INFORMATION

1. PRESENT ZONING OF THE SITE? Tract 1 - Light Industrial; Tract 2 - Heavy Commercial
2. IF A ZONING CHANGE IS NEEDED, WHAT SHOULD NEW ZONING BE? --
3. PRESENT LAND USE OF SITE Chemical Distributor -- Light Industrial

D. OPERATING INFORMATION

DESCRIPTION OF THE OPERATION

WASTES TO BE STORED

QUANTITY OF WASTE TO BE STORED

PROCESS USED TO STORE

CHEMICAL AND PHYSICAL ANALYSES

WASTE ANALYSIS PLAN

BRANCH SCALE DRAWING

TRAFFIC PATTERN

RECORDKEEPING AND REPORTING PROCEDURES

D. OPERATING INFORMATION

1. IS WASTE GENERATED ON SITE? ☐ YES ☒ NO LIST THE SIC CODES (4-DIGIT)
5161

DSW, Inc.

General Description of Facility

DSW, Inc. is a nationwide distributor of various industrial chemicals and solvents. McKesson EnviroSystems, division of the McKesson family, operates a number of recycling plants across the country and functions as a natural partner to the distributor network which DSW, Inc. maintains.

The recycling of spent solvents is but one of the services DSW, Inc. offers to its customers. Many customers who employ its reclaiming services are those who purchased the virgin product from DSW, Inc. in the first place. In this manner, DSW, Inc. provides for its customers to properly manage their wastes and to conserve resources.

The branch in Tampa consists of a prefabricated concrete building of approximately 30,000 square feet. Of this total area, approximately 5,000 square feet is office, and the remainder is warehouse storage. A repackaging room is located on the east side of the warehouse for drumming bulk solvents into 55-gallon drums. A fire-retardant wall separates this room from the main warehouse. This same wall is a divider for the designated hazardous waste storage area. Overall yard area is about 5.5 acres, all of which is fenced in.

The branch will be utilized by DSW, Inc. as a temporary storage facility for various solvents destined for recycling. The

REVISED
SEPT. 22, 1986

operation followed is one of picking up a customer's (generator's) spent materials, bringing the material back to the DSW, Inc. facility, and placing it into temporary storage until a full truckload of various customers' materials are accumulated, and then reshipping the materials to the recycling center. The containers in which these spent materials are shipped to the branch are of a 55-gallon capacity meeting all DOT specifications for the material being shipped in them. All materials are received, stored, and reshipped in the same container.

All movements and handling of materials designated as hazardous wastes at the facility are undertaken in accordance with operational plans as outlined in this application. No treatment, processing, or disposal of hazardous wastes will take place at this facility.

Experience at other branches handling these types of solvent streams indicate the following of industries are served:

Metalworking: A wide variety of metalworking and machinery manufacture operations require a final degreasing step in order to remove lubricating oil, etc.: lathing, grinding, cutting, stamping. The chlorinated solvents are the workhorses of this business.

Electronic: Circuit boards commonly require a de-oiling step to remove lubricants, solder fluxes, and the like. Although the chlorinated solvents are effective, the fluorinated counter-parts are generally preferred.

DSW, Inc.

General Description of Facility

Page 3.

Ink, Adhesives: A wide variety of oxygen - containing solvents is used in cleaning out mixing vats, printing rolls, transfer containers, piping, and so on.

Other Industries: Spent solvent streams have been obtained also from the pharmaceutical, photographic, electrical, textiles, rubber and plastics industries.

This branch and its hazardous waste storage facility handle only containerized wastes - there are no tanks, waste piles, surface impoundments, or incinerators involved. All hazardous wastes to be stored are free liquids.

A site plan of the branch, prepared by a Florida - licensed engineer, follows. The location of the hazardous waste storage facility within the branch is identified.

REVISED
SEPT. 22, 1986

| | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|-----------------------|-----|--|--|--|--|---|-----|--|--|--|--|
| EPA I.D. NUMBER (enter from page 1) | | | | | | | | | | | | | | | FOR OFFICIAL USE ONLY | | | | | | | | | | | |
| W | F | L | D | 0 | 2 | 0 | 9 | 8 | 5 | 7 | 2 | 7 | 1 | 1 | W | DUP | | | | | 2 | DUP | | | | |

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES | | | | | | | | | | | | |
|----------|---------------------------------------|---------------------------------------|---------------------------------|--------------------------|---|---|--|--|--|--|--|---|--|--|--|--|
| | | | | 1. PROCESS CODES (enter) | | | | | | | | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) | | | | |
| 1 | F 0 0 1 | 1100 | G | S | 0 | 1 | | | | | | | | | | |
| 2 | F 0 0 2 | 1100 | G | S | 0 | 1 | | | | | | | | | | |
| 3 | F 0 0 3 | 1100 | G | S | 0 | 1 | | | | | | | | | | |
| 4 | F 0 0 5 | 1100 | G | S | 0 | 1 | | | | | | | | | | |
| 5 | D 0 0 1 | 550 | G | S | 0 | 1 | | | | | | | | | | |
| 6 | U 0 0 2 | 550 | G | S | 0 | 1 | | | | | | | | | | |
| 7 | U 0 7 5 | 550 | G | S | 0 | 1 | | | | | | | | | | |
| 8 | U 0 8 0 | 550 | G | S | 0 | 1 | | | | | | | | | | |
| 9 | U 1 4 0 | 550 | G | S | 0 | 1 | | | | | | | | | | |
| 10 | U 1 5 4 | 1100 | G | S | 0 | 1 | | | | | | | | | | |
| 11 | U 1 5 9 | 1100 | G | S | 0 | 1 | | | | | | | | | | |
| 12 | U 2 1 0 | 550 | G | S | 0 | 1 | | | | | | | | | | |
| 13 | U 2 2 0 | 550 | G | S | 0 | 1 | | | | | | | | | | |
| 14 | U 2 2 6 | 1100 | G | S | 0 | 1 | | | | | | | | | | |
| 15 | U 2 2 8 | 1100 | G | S | 0 | 1 | | | | | | | | | | |
| 16 | U 2 3 9 | 550 | G | S | 0 | 1 | | | | | | | | | | |
| 17 | | | | | | | | | | | | | | | | |
| 18 | | | | | | | | | | | | | | | | |
| 19 | | | | | | | | | | | | | | | | |
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HAZARDOUS WASTE TO BE
STORED AT TAMPA FACILITY
IDENTIFICATION AND ANNUAL
QUANTITIES

7/22/76



BROOKS—WADE—AMADEN, INC. Civil Engineering—Land Surveying

5400 E. DIANA ST. • P. O. BOX 2641 • TAMPA, FLORIDA 33601 • PHONE 813/621-6911

DONALD E. BROOKS
REGISTERED ENGINEER NO. 6401
REGISTERED SURVEYOR NO. 1302

CLARENCE WADE, JR.
REGISTERED SURVEYOR NO. 2430

WALTER D. AMADEN
REGISTERED ENGINEER NO. 10886

July 15, 1976

Mr. Truett Ott
Attorney at Law
1201 Swan Ave.
Tampa, Florida 33606

RE: Bench Mark
Moreland Chemical Co.

Dear Mr. Ott:

This is to advise you, and others that may be concerned, that on July 7, 1976 our firm established a bench mark adjacent to the Moreland Chemical Company, Inc. Property. This work was requested by Mr. Foster, from the Chemical Company offices in Spartanburg, South Carolina. A description of this bench mark is as follows:

Top of nail & cap located between the S.C.L.R.R. rails on Road 41-A, in Section 10, Township 30 South, Range 19 East, Hillsborough County, Florida.

U.S.C. & G.S. Datum
Elevation = 9.25 M.S.L.

This bench was established from a U.S.C. & G.S. bench mark NO. Y-256 (1965), which is located approximately 0.3 miles North of Road 41-A on U.S. Highway 41.

If you have any additional questions, please advise.

Very truly yours,

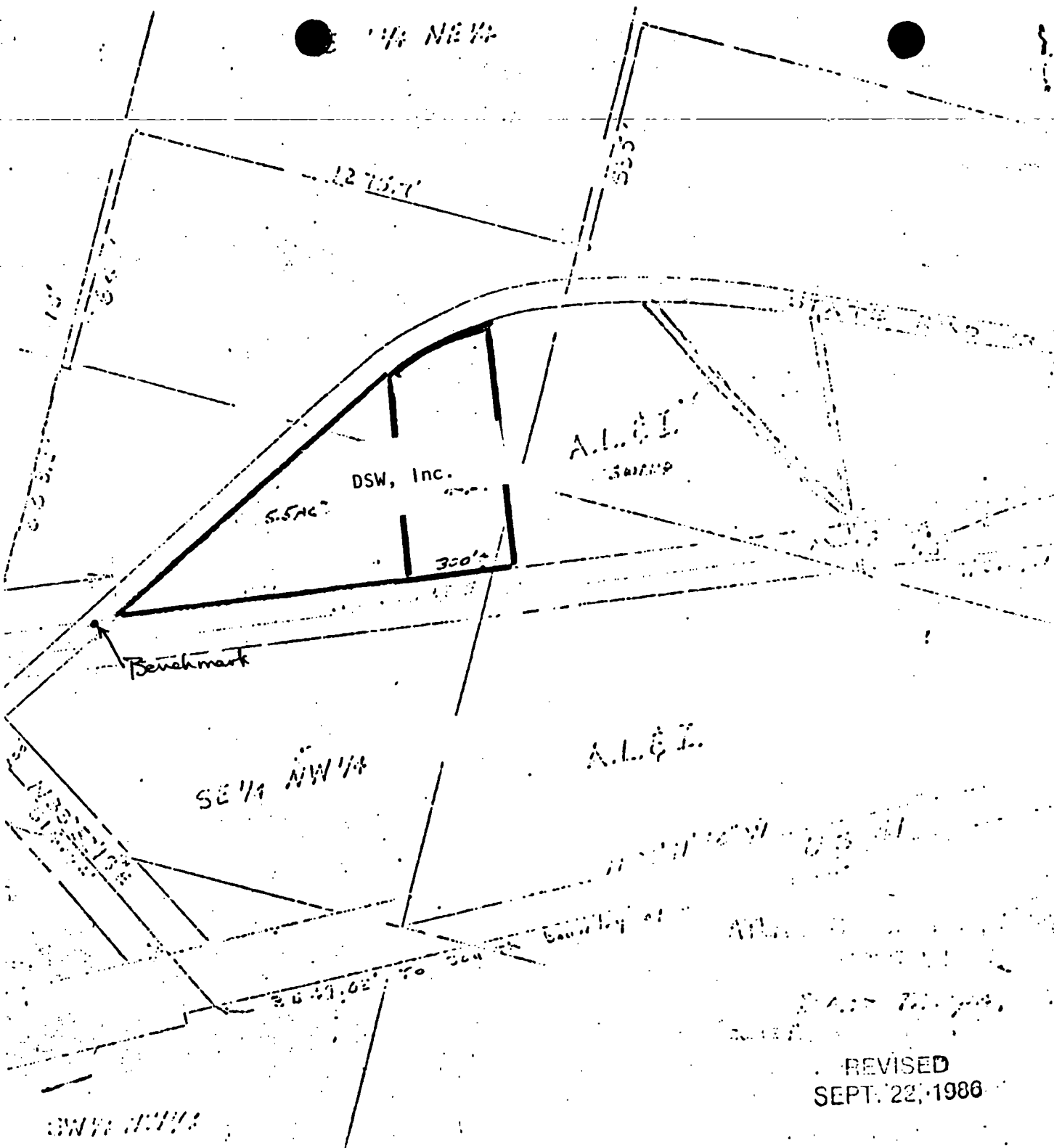
BROOKS-WADE-AMADEN, INC.

Donald E. Brooks

DEB/nc

NW 1/4 NE 1/4

NE 1/4 NE 1/4



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SEPT. 22, 1986

DSW, Inc.

Site Information - Wells

The Southwest Florida Water Management District has identified a number of wells as being located in Section 10 of the preceding U.S.G.S. 7.5 Minute Topographic map; these are checked off in red on the following computer printout pages. Those labelled "A" are for purposes of irrigation, and those labelled "D" are house wells. Injection wells would be labelled "J"; there are none.

REVISED
SEPT. 22, 1986

WELL CONSTRUCTION LIST

DATE 4/10/85

| D P U S E | P E R M I T | D R I L E M | B A C K S I T E M V | L O C A T I O N S E T N R B M | D C A S E E L T S | D G R A D E L T S | D R I L E M V | S M L S D P L E O | S E D C L L A A | S E D C L L A A | D C L L A A | T H L L A A | D C L L A A | T H L L A A | I C L L A A | D C L L A A | U M F E R A | O M N E R |
|-----------------------|----------------------------|----------------------------|--|---|---|---|---------------------------------|---|--------------------------------------|--------------------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|-----------------------|
| WPC353017 | 2076 | A | 13 29 | 103010 2 | 18 65 | | C | 5 | | | | | | | | | | ADAMS, LOUI |
| WPC3565597 | 1056 | A | 13 29 | WME 103010 4 | *** | | CANCELLED *** | | | | | | | | | | | |
| WPC368282 | 1094 | D | 14 29 | 103010 9 | *** | | CANCELLED *** | | | | | | | | | | | |
| WPC376437 | 1598 | D | 14 29 | 103010 4 | | | | | | | | | | | | | | YATES, JOHN |
| WPC376948 | 2250 | D | 14 29 | 103010 2 | 29 90 | 10 | R | | | | | | | | | | | FOSTER, DEN |
| WPC380009 | 1094 | A | 15 29 | 103010 2 | 60 115 | 23 | R | 5 | | | | | | | | | | RICHMOND, G |
| WPC384882 | 1057 | D | 13 29 | 103010 4 | 104 170 | | C | 8 | | | | | | | 22 | | | HEUBER, C |
| WPC321164 | 1010 | A | 11 29 | 103010 4 | 67 120 | | C | 6 | | | | | | | 40 | 60 | | B WIGMAN |
| WPC322808 | 1056 | D | 13 29 | 103010 3 | 82 100 | | C | 6 | MS | 39 | 11 | | | | 50 | 50 | 50 | J ARNOLD |
| WPC330298 | 1056 | D | 13 29 | 103010 3 | 93 106 | | C | 11 | MS | 21 | MG | 2 | 47 | 6 | 23 | 23 | | J ESPY |
| WPC333809 | 1094 | A | 13 29 | 103010 4 | 131 223 | | R | | MS | 12 | ME | 24 | 36 | NA | 19 | 74 | TA | TANPA ELECT |
| WPC336962 | 1086 | D | 14 29 | 103010 4 | 93 80 | | C | 5 | MS | MB | 10 | WH | 30 | | 40 | 40 | 40 | S FERLITA |
| WPC385270 | 2250 | A | 14 29 | 103010 4 | *** | | CANCELLED *** | | | | | | | | | | | |
| WPC399040 | 2251 | A | 13 29 | 103010 4 | 140 225 | 29 | R | 15 | | | | | | | | | | JOE LACKEY |
| WPC399730 | 2251 | D | 11 29 | 103010 2 | 54 72 | 2 | R | | | | | | | | | | | KRAMER E AS |
| WPC376536 | 1232 | A | 14 29 | 113010 4 | 145 160 | 15 | R | 4 | Q L | | | | | | | | | WARFIELD LA |
| WPC381021 | 1056 | A | 14 29 | WESM 113010 4 | 48 96 | | C | 5 | | | | | | | | | | CARLTON PRO |
| WPC394133 | 1232 | P | 11 29 | 113010 9 | 62 160 | | T | 6 | | | | | | | | | | N B DEVELOP |
| WPC320098 | 1609 | D | 21 58 | 153010 3 | 63 110 | | C | 8 | A | MS | 22 | 5 | 46 | | 4 | 42 | 62 | FISHER DR |
| WPC368598 | 1094 | D | 14 29 | 153010 2 | 107 192 | | R | 8 | | | | | | | | | | ROSAZO, WIL |
| WPC329157 | 1056 | D | 11 29 | 153010 3 | 90 76 | | C | | MS | 43 | 1 | | | | 25 | 25 | 25 | SEARS |
| WPC334609 | 1699 | D | 13 29 | 153010 4 | 65 120 | | C | | MS | MM | 55 | NA | 5 | | 60 | 65 | | PINION, C |
| WPC312144 | 0332 | G | 14 29 | 163010 3 | 42 102 | | C | 6 | | | | | | | 30 | 40 | | M K SHURLEY |
| WPC312387 | 0332 | A | 14 29 | 163010 3 | 92 80 | | C | 5 | | | | | | | 30 | 999 | | E L MATTHEW |
| WPC376214 | 2250 | L | 14 29 | 163010 2 | 48 80 | 10 | R | 7 | | | | | | | | | | CARLSON, DU |
| WPC328463 | 1010 | A | 14 29 | 163010 6 | 89 135 | | C | 15 | MS | LB | 40 | NA | 14 | | 54 | 54 | 54 | JENNINS |
| WPC330457 | 1056 | D | 14 29 | 163010 3 | 90 82 | | C | 7 | MS | | 0 | MG | 0 | | 16 | 16 | 16 | S LOPEZ |
| WPC309845 | 0372 | D | 13 29 | 173010 3 | 52 86 | | C | 15 | | | | | | | 52 | 52 | | R HILEY |
| WPC348708 | 1094 | D | 11 29 | 173010 2 | 109 182 | | R | 11 | | | | | | | | | | FITZGERALD, |
| WPC350740 | 1201 | D | 11 29 | 173010 2 | 132 132 | | C | | | | | | | | | | | EYDHANN, DA |
| WPC320113 | 0334 | A | 14 29 | 173010 3 | 21 60 | | C | 4 | | | | | | | 15 | 15 | | J T BUYER |
| WPC320070 | 0119 | A | 14 29 | 173010 3 | 62 80 | | R | 7 | | | | | | | 45 | 45 | | M HENDERSON |
| WPC385056 | 1945 | D | 14 29 | 173010 2 | *** | | CANCELLED *** | | | | | | | | | | | |
| WPC385058 | 1945 | D | 14 29 | 173010 2 | *** | | CANCELLED *** | | | | | | | | | | | |
| WPC385059 | 1945 | D | 14 29 | 173010 2 | *** | | CANCELLED *** | | | | | | | | | | | |

DSW, Inc.

Chemical and Physical Analyses

DSW, Inc. requires all generators who wish to employ the Company's recycling services to provide data defining the chemical make-up of the generator's waste stream before pick-up of the material is initiated.

The DSW, Inc. branch storing the spent solvents, is provided appropriate data from the information furnished by the customer (generator), which will have been reviewed and evaluated by the technical and management personnel at the recycler's facilities.

A full description of the procedures and sequence of events pertaining to the accumulation of data and analytical information made available and kept on file at the DSW, Inc. storage facility before approval to accept materials is outlined in the Waste Analysis Plan in the next section. This procedure describes fully the operation followed in developing and disseminating the necessary information to assure that all facilities handling the material have adequate information available to manage properly a given waste stream.

DSW, Inc. shall provide to off-site generators wishing to utilize its services any requested proof of appropriate permits to be allowed to handle their particular waste streams. Generators shall also be offered the opportunity to take a tour of any company facility, as well as the actual recycling plants, to allow them an opportunity to assure themselves of compliance of these facilities.

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SEPT. 22, 1986

Wastes Anticipated To Be Handled in Drums At Facility

DSW, Inc.

| <u>Chemical</u> | <u>Hazard</u> | <u>Basis For Hazard Designation</u> |
|---------------------------------------|------------------|-------------------------------------|
| Tetrachloroethylene | Toxic | Listed waste F001, F002 |
| Trichloroethylene | Toxic | Listed waste F001, F002 |
| Methylene Chloride | Toxic | Listed waste F001, F002 |
| 1,1,1 Trichloroethane | Toxic | Listed waste F001, F002 |
| Carbon Tetrachloride | Toxic | Listed waste F001 |
| Chlorinated Fluorocarbons | Toxic | Listed waste F001 |
| Chlorobenzene | Toxic | Listed waste F002 |
| Ortho-Dichlorobenzene | Toxic | Listed waste F002 |
| Trichlorofluoromethane | Toxic | Listed waste F002 |
| 1,1,2-Trichloro-1,2,2-Trifluoroethane | Toxic | Listed waste F002 |
| Xylene | Ignitable | Listed waste F003 |
| Acetone | Ignitable | Listed waste F003 |
| Ethyl Acetate | Ignitable | Listed waste F003 |
| Ethyl Ether | Ignitable | Listed waste F003 |
| Methyl Isobutyl Ketone | Ignitable | Listed waste F003 |
| n-Butyl Alcohol | Ignitable | Listed waste F003 |
| Cyclohexanone | Ignitable | Listed waste F003 |
| Methanol | Ignitable | Listed waste F003 |
| Toluene | Toxic, Ignitable | Listed waste F005 |
| Methyl Ethyl Ketone | Toxic, Ignitable | Listed waste F005 |
| Isobutanol | Toxic, Ignitable | Listed waste F005 |

The above will also be expected in the form of blends with each other, still in drums.

REVISED
SEPT. 22, 1986

Other wastes that could be expected to be stored are mixtures of the preceding listed solvents. The EPA hazard bases are either "Ignitable," "Toxic," or both. The EPA waste number is F001, F002, F003, F005, or combinations. The basis for the hazardous designation is "listed waste." Typical examples of mixed spent solvents wastes are:

* Waste solvent from the pharmaceutical industry -

| | |
|-----------------------|-------------|
| Ortho-dichlorobenzene | 90 Volume % |
| Methylene Chloride | 7 Volume % |
| Water | 3 Volume % |

* Waste solvent from the paint industry -

| | |
|-----------------------------|-------------|
| Methyl Ethyl Ketone | 10 Volume % |
| Methyl Isobutyl Ketone | 3 Volume % |
| Toluene | 32 Volume % |
| Xylene | 45 Volume % |
| n-Butyl Acetate | 2 Volume % |
| Isopropyl Acetate | 2 Volume % |
| Water | 1 Volume % |
| Resins, Pigments, Adhesives | 5 Volume % |

* Waste solvent from the electronics industry -

| | |
|------------------------|-------------|
| 1,1,1-Trichloroethane | 80 Volume % |
| Trichlorofluoromethane | 15 Volume % |
| Resin, Flux, Pigments | 5 Volume % |

* Waste solvent from the metal working industry -

| | |
|--------------------------------|-------------|
| Perchloroethylene | 40 Volume % |
| Methylene Chloride | 25 Volume % |
| Trichloroethylene | 15 Volume % |
| Soil, Grime, Grit, Oil, Grease | 20 Volume % |

REVISED
SEPT. 22, 1986

Still another group of wastes that could be received at this facility are those not listed as hazardous wastes, but do exhibit the characteristics of ignitability, the EPA hazard basis is "Ignitable", the EPA waste number is D001, and the basis for hazardous designation is a flashpoint of 140°F or less. The spent solvents can be received as individual chemicals or a mixtures thereof. Examples are:

| <u>Chemical</u> | <u>Flashpoint (°F)</u> |
|--------------------|------------------------|
| Amyl Acetate | 77 |
| p-Amyl Acetate | 77 |
| Butyl Acetate | 72 |
| s-Butyl Alcohol | 75 |
| t-Butyl Alcohol | 52 |
| Cellosolve Acetate | 117 |
| Cyclohexane | -4 |
| Cyclohexanone | 111 |
| Diisobutyl Ketone | 120 |
| Ethyl Alcohol | 55 |
| Ethyl Cellosolve | 80 |
| Heptane | 25 |
| Hexane | -7 |
| Lactol Spirits | 20 |
| Methyl Acetate | 14 |
| Methyl Amyl Ketone | 120 |
| Methyl Cellosolve | 115 |
| Petroleum Naphtha | 105 |
| Propyl Acetone | 58 |
| iso-Propyl Acetate | 40 |
| Propyl Alcohol | 77 |
| iso-Propyl Alcohol | 53 |
| VMP&P Naphtha | 105 |

Some waste generators prefer to identify their used solvents as "discarded commercial chemical products" rather than as "spent solvents." The EPA hazard codes, waste names, and EPA waste numbers for those expected at this DSW, Inc. facility follow. The basis for hazardous designation is "listed waste."

| | | |
|------|-------------------------|-------|
| U002 | Acetone | (I) |
| U075 | Dichlorodifluoromethane | (T) |
| U080 | Methylene Dichloride | (T) |
| U140 | Isobutyl Alcohol | (I,T) |
| U154 | Methanol | (I) |
| U159 | Methyl Ethyl Ketone | (I,T) |
| U210 | Tetrachloroethylene | (T) |
| U220 | Toluene | (I,T) |
| U226 | 1,1,1-Trichloroethane | (T) |
| U228 | Trichloroethylene | (T) |
| U239 | Xylene | (I) |

____ DSW, Inc.
Waste Analysis Plan

This branch of DSW, Inc. is seeking a permit to function simply as a short-term storage facility (probably less than a month) for a limited variety of spent organic solvents. These will be handled only in DOT-approved drums, and will usually have been picked up in small numbers from customers who had previously purchased the virgin material from DSW, Inc. Once a sufficient number of drums has been accumulated at the branch to make transport economically feasible, they will be moved to a recycler - McKesson EnviroSystems* for reclaiming.

Each branch of DSW, Inc. organizationally is a financial entity unto itself - in other words, it is a small chemical business. Typical of such small chemical distributorships, which carry out no manufacturing processes, the branch has no laboratory facilities. It would be uneconomic and financially impossible to hire technical personnel and to equip a laboratory for the limited amount of material being handled. Even the cost of outside analytical work would be prohibitive, especially in view of the fact that such analytical work would duplicate the effort carried out by McKesson EnviroSystems*.

On the other hand, the objective of a profitable reclaiming business is thwarted unless the major constituents of the spent solvent stream* or other designated recycler.

REVISED
SEPT. 22, 1986

being handled are known accurately. To this end, McKesson EnviroSystems maintains and operates a sophisticated analytical laboratory at each of its reclaiming facilities.

After a proposed waste stream from a new or existing customer (the generator) is evaluated for its economic value by McKesson EnviroSystems and a purchase agreement is completed between McKesson EnviroSystems Company and the customer, a sample is submitted by way of DSW, Inc. to McKesson EnviroSystems* and appropriate analyses over and beyond mere assay of content of the reclaimable solvent are carried out. These will vary from waste stream to waste stream, and reflect a principle of the recycling business - that in most cases exact knowledge of each component present is not required because after a spent solvent is "cleaned" by distillation, the subsequent product is invariably sold by physical characteristics, not by chemical structure. Thus in order to transport, store, and distill spent material only a minimum of information about its composition is required.

The major concerns are (1) verification of the recoverable value of the spent solvent and (2) confirmation of any "warning" information, such as pH or ignitability. The parameters measured vary from waste stream to waste stream; examples of the major parameters needed by the recycler and the rationale for their selection appear in the appended table.

The results of these analyses are reported on a "Results of Laboratory Analysis" form, a copy of which follows; a copy of the completed

* or other designated recycler.

SPENT SOLVENT STREAM -- RESULTS OF LABORATORY ANALYSIS

State Hgh 146

P O Box 406

New Castle, KY 40050

☐ 633 East 138 TH St

P O Box 100

Dolton, IL 60419

☐ KM 51, Highway 2

P O Box 1028

Manati, PR 00701

☐ _____ ☐ _____ ☐ _____

Part A- Spent Stream Identification

Sample Date: _____

Customer Name _____

& Location _____

Spent Stream Name _____

& Misc Information: ☐ - In Bulk ☐ - In Drums Est. Volume- _____

Part B- Basic Required Laboratory Analysis - RCRA (Federal) and Hazardous Waste Regulations (State)

Concentration of Components, Organic Analysis by Gas Chromatography:

| COMPONENT | CONC % | V/V | W/W | COMPONENT | CONC % | V/V | W/W | COMPONENT | CONC % | V/V | W/W |
|-----------|--------|-----|-----|-----------|--------|-----|-----|-----------|--------|-----|-----|
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

Mixture Specific

Gravity @ 25 C _____

Date Sample Analyzed _____

Part C- Additional Laboratory Analytical Results for Streams with Characteristics of Ignitability or Corrosivity:

- Flash Point _____ Method _____
- pH _____ Notes _____

Part D- Stream Information not Involved in Hazardous Waste Regulations but Related to Evaluation Economics, Plant Recovery Efficiencies, Volume of Unrecovered Residues and Similar Factors.

| Item / Description | Result | Item / Description | Result |
|----------------------|--------|--------------------|--------|
| Moisture/water, wt % | | Solids, wt % | |
| BTU | | Ash | |
| Color | | Odor | |
| Lab Recovery % | | Chlorides | |
| | | | |
| | | | |

Chemist/Technician Signature _____ Date _____ Review By _____ Notes _____

PARAMETERS MEASURED IN EVALUATION OF SPENT SOLVENT STREAMS

A. By McKesson Envirosystems on Pre-shipment Sample

| <u>PARAMETER</u> | <u>TEST METHOD</u> | <u>PURPOSE</u> |
|------------------|---|--|
| Assay | Gas Chromatograph | To confirm identity, amount of recoverable component(s), and major containments, if any. |
| Specific Gravity | Hydrometer and glass cylinder (graduate), as exemplified by ASTM D2111-71 | Useful in product identity; permits conversion of volume to weight. |
| Water | Titrimetric (Karl Fischer) | Possible contamination. |
| Flash Point | Closed cup ASTM D-93-79 (SW-846 4.1-1) | Flammability danger. |
| pH | Electrometrically (SW-846 5.2) | Danger of corrosion. |

B. By DSW, Inc. Branch on Actual Shipment

| <u>PARAMETER</u> | <u>TEST METHOD</u> | <u>PURPOSE</u> |
|------------------|--|--|
| Specific Gravity | Hydrometer as exemplified by ASTM D2111-71 | To compare with pre-shipment sample and previous shipments. |
| Appearance | Visual examination of sample for color, clarity, phase separation. | To compare with pre-shipment sample and previous shipments. |
| pH (if aqueous) | pH paper | To define acidity or alkalinity for comparison with pre-shipment sample and previous shipments (will usually not be relevant). |

REVISED
SEPT. 22, 1986

form is sent to the DSW, Inc. branch prior to the branch's sending a truck to bring the drums of spent solvent back to the branch.

These physical and chemical analyses of each waste stream will be repeated when

- (1) It is necessary to ensure that they are accurate and up-to-date.
- (2) The branch is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed.
- (3) A manifest discrepancy is detected (unless the branch chooses to return the shipment to the generator).

Upon receipt of these drums of solvent, the DSW, Inc. branch has the responsibility of measuring a sufficient number of parameters to assure the branch that the customer did indeed send what he had agreed to. This consideration leads to the selection of "fingerprint" parameters, the measurement of which will provide reasonable assurance to the branch that the drums of spent solvent received from a generator actually contain what the customer agreed to submit as established by the analysis by McKesson EnviroSystems of the corresponding sample. In addition to comparing the information on the manifest as to number of drums and their contents as defined on the hazardous waste labels, the following physical data will be determined at the branch on samples taken from an appropriate number of drums from each waste

stream:

1. Physical state of the spent solvent, including phase separation.
2. Color and texture.
3. Whether the liquid is substantially aqueous, organic, or both.
4. The pH of any aqueous waste.
5. Specific gravity.

The method of sampling the drums is described in the appended "Standard Procedure for Sampling Waste Containers".

Ten per cent of the number of drums in a given waste stream, rounded up to the next higher whole number, will be sampled; thus,

1. For 1 - 10 drums of a single waste stream, one drum sampled;
2. For 11 - 20 drums, two drums sampled;
3. For 21 - 30 drums, three drums sampled; and so on.

The results of the measurements of the fingerprint parameters selected for a given waste stream will be compared to the values obtained from previous shipments of that stream and will be required to fall within an established range ("plus or minus") for that parameter, such range having been established over a period of time based on observed values for that waste stream from that customer. However, at this point in time relative to the hazardous waste storage activity at this DSW, Inc. branch, there are no long-term established customers and consequently no body of historical information descriptive of

REVISED
SEPT. 22, 1986

the industrial processes generating corresponding waste streams. Therefore, until sufficient information is obtained to permit establishing a "specification" for an acceptable waste stream, two approaches will be undertaken to provide standards against which to compare subsequent samples taken from a given waste stream upon its arrival at the branch:

1. For a quantitative value - e.g., specific gravity - plus or minus 20% of the value determined from the pre-shipment sample.
2. For qualitative values (color, phase separation, etc.) comparison against records of the same stream from a previous shipment. A significant deviation in color or general appearance (e.g., content of sediment) will lead to consideration of rejection of the shipment.

The sampling of the wastes and the verification steps previously described will be carried out in the waste storage area. Any remaining sample material will be returned to the drum from which it was taken. the sampling and verification steps will be carried out by the facility Operations Manager.

All these data and observations will be recorded at the branch and maintained as part of the branch's operating record.

The sampling procedure and the procedure for determination of specific gravity follow.

REVISED
SEPT. 22, 1986

STANDARD PROCEDURE
For
SAMPLING WASTE CONTAINERS

Uniform Requirements for Sample Taking

Personnel Safety Precautions

Prior to opening the container for sample withdrawal, the employee who is to do the sampling must be wearing his hardhat, his safety glasses, and his solvent-impervious gloves.

The equipment required in order to obtain a sample consists of:

- A Coliwasa type sampling tube.
- A clean, dry glass sample bottle.
- A screw-cap for the sample bottle which is fitted with a polyethylene poly-cone seal.
- A label containing the following information:
 - The manifest number corresponding to the waste shipment.
 - The name of the waste being sampled.
 - The date on which the sample is taken.
 - The name of the employee withdrawing the sample.

CAUTION: Always leave about one-inch of free space in the sample bottle before it is closed. Never fill the sample bottle to the brim. Quite frequently the sample is withdrawn at a temperature which is less than the temperature in which the sample will be stored prior to analysis. As the temperature increases, the liquid expands. If the sample bottle is completely filled, the expanding liquid has no place to go and it will shatter the bottle.

Sampling Procedure for Drums

1. Sampling is done through the bung on the drum. When removing the bung closure of the drum, first loosen it slightly without completely removing the bung in order to relieve any internal pressure which may have been built up because of change in temperature.
2. After you are sure that there is no pressure in the drum, remove the bung closure completely.
3. Open the bottom valve of the Coliwasa type sampler completely.
4. Lower the sampler slowly into the drum until the bottom of the sampler reaches the bottom of the drum.
5. Close the bottom valve of the Coliwasa type sampler completely.
6. Withdraw the sampler from the container.
7. Transfer the content of the sampler to the sample bottle.
8. Screw the cap tightly onto the bottle.
9. Affix the appropriate label to the bottle.
10. Wipe any spillage from the outside of the bottle.
11. Clean the Coliwasa sampler prior to using it on the next drum.
12. Inspect the gasket on the drum closure to make sure it is in good condition.

Disposition of the Sample

After the samples have been taken, the sampling containers closed, the labels affixed, and the sample containers wiped off, take the samples to the laboratory and turn them over to the chemist for analysis.



Designation: D 2111 - 71 (Reapproved 1978)

Standard Test Methods for SPECIFIC GRAVITY OF HALOGENATED ORGANIC SOLVENTS AND THEIR ADMIXTURES¹

This standard is issued under the fixed designation D 2111; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (ϵ) indicates an editorial change since the last revision or reapproval.

These methods have been approved for use by agencies of the Department of Defense and for listing in the DoD Index of Specifications and Standards.

1. Scope

1.1 These methods cover the determination of the specific gravity of halogenated organic solvents and solvent admixtures. They define suitable apparatus and procedures and furnish details underlying the interpretation of test data and the selection of numerical limits for agreement among interested persons and agencies.

1.2 Four methods are covered as follows:

1.2.1 *Method A*, specific gravity by means of a specific gravity balance.

1.2.2 *Method B*, specific gravity by means of a hydrometer.

1.2.3 *Method C*, specific gravity by means of a pycnometer.

1.2.4 *Method D*, specific gravity by means of a vacuum pycnometer.

NOTE 1—In referee problems, Methods A, C, or D may be used.

2. Definitions

2.1 *specific gravity*—the ratio of the weight in air of a given volume of the material at a stated temperature to the weight in air of an equal volume of distilled water at a stated temperature. It shall be stated thus:

2.1.1 When the temperatures of the material and of the water are the same:

Specific gravity x/x C....

where x = temperature of the material and the water.

2.1.2 When the temperature of the material and of the water are not the same:

Specific gravity x/y C....

where:

x = temperature of the material, and

y = temperature of the water.

2.1.3 *specific gravity, absolute*—the ratio of the weight referred to vacuum of a given volume of the material at a stated temperature to the weight referred to vacuum of an equal volume of gas-free distilled water (Note 2) at a stated temperature. It shall be stated as in 2.1.

NOTE 2—Gas-free distilled water is distilled water that has been boiled to eliminate dissolved gases.

3. Test Temperatures

3.1 Material specifications often specify different temperatures at which specific gravity shall be measured:

Specific gravity 15/4 C
Specific gravity 20/20 C
Specific gravity 25/25 C

For purposes of unity, the test temperature used throughout shall be 25/25 C.

3.2 For some of the liquids, an agreement may be reached as to the coefficient of expansion of the product. In such cases, the specific gravity may be changed from one temperature basis to another as described in Section 14.

¹These methods are under the jurisdiction of ASTM Committee D-26 on Halogenated Organic Solvents. Current edition effective April 15, 1971. Originally issued 1962. Replaces D 2111-64.

METHOD B—SPECIFIC GRAVITY BY MEANS OF A HYDROMETER

7. Apparatus

7.1 *Hydrometer*—The hydrometers to be used shall be those specified in ASTM Specification E 100, for ASTM Hydrometers¹ as follows:

| Nominal Specific Gravity Range | ASTM Hydrometer No. |
|--------------------------------|---------------------|
| 0.900 to 0.950 | 107H |
| 0.950 to 1.000 | 108H |
| 1.000 to 1.050 | 125H |
| 1.050 to 1.100 | 126H |
| 1.100 to 1.150 | 127H |
| 1.150 to 1.200 | 128H |
| 1.200 to 1.250 | 129H |
| 1.250 to 1.300 | 130H |
| 1.300 to 1.350 | 131H |
| 1.350 to 1.400 | 132H |
| 1.400 to 1.450 | 133H |
| 1.450 to 1.500 | 134H |
| 1.500 to 1.550 | 135H |
| 1.550 to 1.600 | 136H |
| 1.600 to 1.650 | 137H |

7.2 *Hydrometer Cylinder*—The vessel in which the sample for the gravity test is confined shall be made of clear glass and shall be cylindrical in shape. For convenience in pouring, it may have a lip on the rim. The inside diameter shall be at least 25.4 mm (1.0 in.) greater than the outside diameter of the hydrometer used in it. The height of the cylinder shall be such that the length of the column of sample it contains is greater by at least 25.4 mm (1.0 in.) than the portion of the hydrometer that is immersed beneath the surface of the sample after a state of equilibrium has been reached.

7.3 *Thermometer*—See 4.3.

7.4 *Water Bath*—See 4.4.

8. Procedure

8.1 Cool the sample in the original container to about 24°C. Rinse each piece of equipment with a portion of the sample. Pour the sample

¹ Annual Book of ASTM Standards, Part 25 and 44.

into the clean hydrometer cylinder without splashing, so as to avoid formation of air bubbles. Remove any air bubbles adhering to the surface by touching them with a piece of clean filter paper. Select a location that is free of air currents. Place the cylinder vertically in the water bath and let the temperature of the sample reach $25.0 \pm 0.5^\circ\text{C}$ as follows: Stir the contents of the cylinder, being careful to avoid formation of air bubbles. When the temperature of the sample is 24.5°C , slowly and carefully lower the hydrometer into the sample to a level two smallest scale divisions below that at which it will float and then release the hydrometer. After it has come to rest and floats freely away from the walls of the cylinder, read the gravity as the point at which the surface of the sample apparently cuts the hydrometer scale.

8.2 When the temperature is 25.0°C , make this observation by placing the eye slightly below the level of the liquid and slowly raise the eye until the surface of the sample first seen as a distorted ellipse seems to become a straight line cutting the hydrometer scale. Determine the temperature of the sample just before and also, for referee tests, just after reading the hydrometer.

DSW, Inc.

Traffic Patterns

The DSW, Inc. branch in Tampa has the following trucking fleet available for use in the transport of hazardous waste.

Five - 3-axle tandem tractors

One - 2-axle tractor

Two - 24-foot tandem axle straight trucks

Three - 40-foot van trailers

One - 30-foot van trailer

The maximum gross vehicle weight of the largest tractor/trailer combination at this facility is 80,000 pounds (loaded).

Access to this facility from any direction involves County Road 41 A which passes directly in front of the Tampa branch. Access to this road is from U. S. Highway 41. Interstate 4 is located 6 miles north of Road 41 A. U. S. Highway 41 is a 4 - and 6-lane major highway of concrete construction, with load-bearing capacities to withstand even the largest and heaviest vehicle combination used by this branch. The same holds true of the yard area used by vehicles within the

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SEPT. 22, 1986

facility yard, which is partially paved with concrete 75 feet in front of the warehouse.

The great majority of transport will be made on company-owned and-permitted trucks based at the facility, although a customer that has a properly-permitted vehicle may occasionally make a similar delivery of spent materials.

As noted previously, the entire yard area paved with concrete is of sufficient strength to permit loaded truck traffic - an estimated compressive strength of 3000 psi. Traffic enters the main gate, proceeds east to a turnaround area and returns west to enable the truck to back into the loading dock. The location of the proposed secondary containment area is such as to isolate it effectively from moving vehicular traffic.

No significant additional traffic is expected to be generated along these routes because of hazardous waste transport activity. This is because essentially all deliveries of drums of spent solvents to the facility will be by DSW, Inc. trucks returning from their normal day's deliveries.

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SEPT. 22, 1986

To illustrate this point, branch management estimates the following truck traffic at the branch over the course of a month (in-and-out):

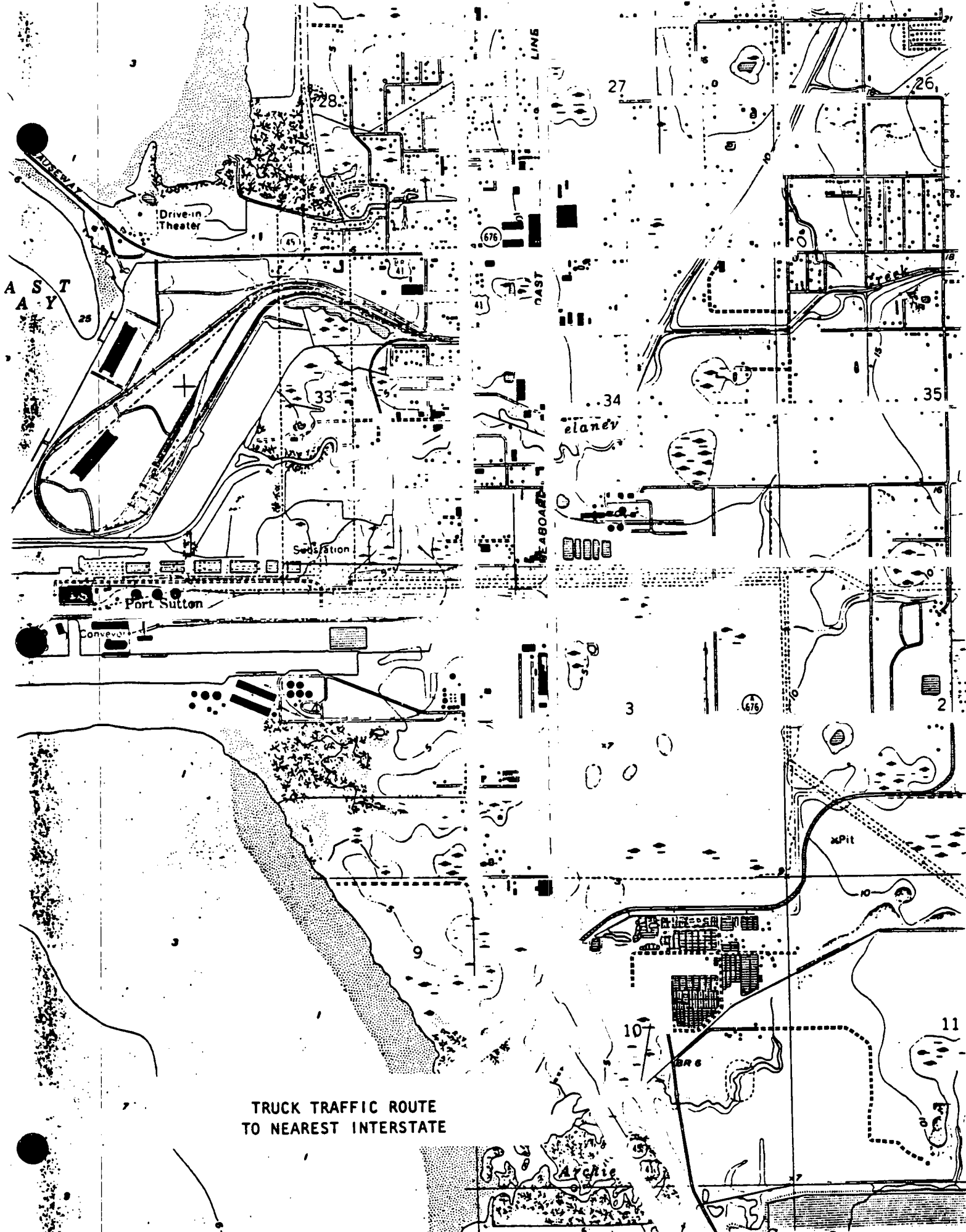
| | |
|--|-----------|
| Tampa branch trucks | 396 |
| Other branch trucks and common carriers | 44 |
| Customer pickups | <u>88</u> |
| Total | 528 |

| | |
|---------------------------|----|
| Hazardous waste shipments | 16 |
|---------------------------|----|

The shipment of hazardous waste to the recycling center amounts to an increase in branch traffic of 3%.

The appended map depicts the truck route from the branch to the nearest Interstate Highway.

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SEPT. 22, 1986



TRUCK TRAFFIC ROUTE
TO NEAREST INTERSTATE

E. FACILITY SECURITY INFORMATION

SECURITY PROCEDURES

CONTINGENCY PLAN

PROCEDURES, STRUCTURES, EQUIPMENT

PREPAREDNESS AND PREVENTION

TRAINING PROGRAM

DSW, Inc.

Security

This DSW, Inc. facility employs a number of measures designed to assure adequate security in order to comply with government regulations and to ensure the protection of company assets.

This facility does not utilize a 24-hour entry surveillance system, but does have other means of control to provide adequate security. A manual fire alarm system is present at this facility. A security guard is also employed for nighttime hours and patrols the yard area of the complex.

A fence surrounds the perimeter of the branch. It is constructed of a 6-foot high, chain link with a 2-inch mesh. Above the chain link, supported on the top of the steep upright posts, are arms projecting 1 foot at a 45 degree angle from vertical, holding 3 strands of barbed wire strung around the entire fence.

Access of the areas of the branch which are surrounded by the fence will be by one of two gates. Vehicular traffic carrying hazardous wastes will reach the unloading/loading dock area by way of a 24-foot double gate in the north stretch of fence. There is also a double gate on the west side of the facility for access of the railroad to spot tankcars. This gate is locked and controlled by the Seaboard Coastline Railroad, and is unlocked and open only when being used.

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SEPT. 22, 1986

The branch's security guard monitors the railroad's activities after hours. Both gates are of the same construction as the fencing in which they are positioned.

The above - mentioned gates are maintained in a closed and padlocked condition during all periods of facility non-working hours. During working hours, the fence gates are observed at all times from either the general office or the working area and Operations Manager's office. All visitors must gain access to the facility by way of the main office located on the west side of the facility. A secured and attended vestibule lies immediately inside the entrance door at which point a receptionist inquires as to a visitor's identification and purpose of visit. It is DSW, Inc. policy that no one shall be allowed to gain access to any part of the immediate facility without being accompanied by a DSW, Inc. employee. Any visits and/or inspections pertinent to the functioning of the branch as a hazardous waste management facility are to be logged in the facility's operation log.

All doors as well as the gates which were previously described are maintained in a locked and secured condition during non-working hours.

Warning signs are posted at all gates and several other fence locations around the facility in such a manner to be visible from all angles of

approach, and shall bear the legend "Danger - Unauthorized Personnel Keep Out". There are also "No Smoking" signs posted in prominent positions in the yard and loading areas, as well as other precautionary and safety signs, to ensure that no ignition sources are present in these areas. The restriction of smoking only in designated areas is again a standard DSW, Inc. working rule.

No materials, empty pallets, or drums are permitted to be stacked against the fence in order to prevent easy access or concealment.

All critical locks are changed whenever a key holder leaves the company, when a key is lost, or every two years, whichever comes first.

All available lighting will be utilized to illuminate the buildings, fence, and yard. Manual timers are installed to control lighting on buildings; photo electric timers are on light poles.

CONTINGENCY PLAN

Operator

DSW, Inc.

6051 Highway 41A, South

Tampa, Florida 33619

(813)677-8414

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SEPT. 22, 1986

I. INTRODUCTION

This DSW, Inc. branch is a distributor of chemicals and industrial solvents. It carries out no manufacturing or processing. It may repack certain solvents - filling 55-gallon metal drums from either a stationary storage tank or from a tank truck or rail car. Its hazardous waste activities consist of picking up small numbers of drums of spent solvents from its customers and storing them until an economic truckload is accumulated - at which time they are transported to a recycling facility.

A copy of the branch's emergency response blueprint follows.

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SEPT. 22, 1986

11. THE CONTINGENCY PLAN

This Contingency Plan is intended to provide information and to assign responsibilities to enable branch personnel to undertake actions that will minimize any threat to the branch employees, residential and business neighbors, company and adjoining property, and to the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste, hazardous waste constituents or hazardous materials to air, soil, or surface water.

The provisions of the Plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste, hazardous waste constituents, or hazardous materials which could threaten human health or the environment.

The data are organized so that changes in personnel, procedures, and regulations can be easily incorporated into the Plan as they occur, insuring that all information is up-to-date. The Plan will be reviewed and amended, if necessary, whenever

1. The facility hazardous waste permit is revised;
2. The Plan fails in an emergency;
3. The DSW, Inc. branch changes - in its design, construction, operation, maintenance, or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste, hazardous waste constituents, or hazardous materials or changes the response necessary in an emergency;

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SEPT. 22, 1986.

II. CONTINGENCY PLAN (CONT'D)

4. The list of emergency coordinators changes; or
5. The list of emergency equipment changes.

A copy of the Contingency Plan is maintained at the branch. The responsibility for keeping it up-to-date rests with the Branch Manager. Copies are submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

The provisions of the Plan will be implemented immediately in the event of a fire, explosion or related release of hazardous materials or hazardous wastes in the branch. In addition, the branch manager will have the authority to put the emergency procedure into action in the event he believes such a condition is imminent, even though it is not occurring. Situations requiring implementation of the Contingency Plan/emergency response procedures are:

1. An explosion taking place at the branch.
2. There is a major fire at the branch.
3. There is an accidental rupture, a major release, discharge or spill of hazardous waste or hazardous/toxic material which may:
 - a. Create a fire or explosion hazard.
 - b. Release health harmful vapors.
 - c. Create the potential for soil, air or water contamination.

III. THE EMERGENCY COORDINATOR

Responsibility for responding to emergencies and implementing contingency procedures as required rests in the Emergency Coordinator.

The list of names on the following page identifies the primary Emergency Coordinator and his alternates at the branch. If the primary Emergency Coordinator is not available, the alternate will be contacted.

The primary Emergency Coordinator and alternate have the authority to commit resources of the Company in the event of an emergency. One or the other will either be on the facility premises or on call at all times with the responsibility for coordinating all emergency response measures. The Emergency Coordinator is thoroughly familiar with all aspects of the facility's Contingency Plan, all operations and activities at the facility, the location and characteristic of hazardous waste and hazardous materials handled, the location of all records within the facility, and the facility layout.

EMERGENCY COORDINATORS

DSW, Inc.

TAMPA, FLORIDA BRANCH

Branch Manager
Howard E. Rainwater

Operations Manager
Edward A. Kerul

Administration Manager
Steven Roönick

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IV. GENERAL EMERGENCY PROCEDURES

1. Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or his alternate when the Emergency Coordinator is on call) will immediately:
 - (i) Activate internal facility alarms and communication systems, to notify all facility personnel; and
 - (ii) Notify appropriate State or local agencies with designated response roles if their help is needed.
2. Whenever there is a release, fire or explosion, the Emergency Coordinator will immediately identify the character, exact source, amount, and extent of any released materials. He does this by observation or review of facility records or manifests, and, if necessary, by chemical analysis.
3. Concurrently, the Emergency Coordinator will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water of chemical agents used to control fire and heat-induced explosions).
4. If the Emergency Coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he will report his findings as follows:

IV. GENERAL EMERGENCY PROCEDURES (CONT'D)

- (i) If his assessment indicates that evacuation of local areas may be advisable, he will immediately notify appropriate local authorities. He will be available to help appropriate officials decide whether local areas should be evacuated; and
- (ii) He must immediately notify the appropriate State Emergency Agency*. The report will include:
 - (I) Name and telephone number of reporter;
 - (II) Name and address of facility;
 - (III) Time and type of incident (e.g., release, fire);
 - (IV) Name and quantity of material(s) involved, to the extent known;
 - (V) The extent of injuries, if any; and
 - (VI) The possible hazards to human health, or the environment, outside the facility.
- 5. During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste or hazardous waste materials at the Branch. These measures will include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.
- 6. If the branch stops operations in response to a fire, explosion, or release, the Emergency Coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes,

* In Florida, the state DER office within the affected District (see following map).

IV. GENERAL PROCEDURES (CONT'D)

6. (Cont'd)

or other equipment, wherever this is appropriate.

7. Immediately after an emergency, the Emergency Coordinator will 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, and treat such material as hazardous waste.
8. The Emergency Coordinator will ensure that, in the affected area(s) of the branch:
- (i) No waste or hazardous material that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
 - (ii) All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed.
9. The owner or operator must notify the appropriate State authority* and the Regional Administrator of the USEPA and the appropriate local authorities that the facility is in compliance with part 8 of this subparagraph before operations are resumed in the affected area(s) of the branch.
10. 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, he must submit a written report on the incident to the appropriate State authority* and the Regional Administration of the

* In Florida, the state DER office within the affected District (see following map).

NORTHWEST DIST.

Robert V. Kriegel, Dist. Man.
160 Governmental Center
Pensacola, FL 32501
904-436-8300
(Suncom 695-8300)

NORTHWEST DIST. BRANCH OFFICE

217 E. 23rd St.
Suite 8
Panama City, FL 32408
904-769-3576
(Suncom 221-3360)

NORTHWEST DIST. BRANCH OFFICE

Twin Towers Office Bldg
2600 Blair Stone Rd.
Tallahassee, FL 32301
904-488-3704
(Suncom 278-3704)

NORTHEAST DIST.

G. Doug Dutton, Dist. Man.
3426 Bills Rd.
Jacksonville, FL 32207
904-396-6959
(Suncom 620-6296)

NORTHEAST DIST. BRANCH OFFICE

825 N.W. 23rd Ave., Suite G
Gainesville, FL 32601
904-377-7528
(Suncom 620-5150)

ST. JOHNS RIVER DIST.

Alex Senkevich, Dist. Man.
3319 Maguire Blvd., Suite 232
Orlando, FL 32803
305-423-6380
(Suncom 393-1011)

SOUTHWEST DIST.

William K. Hennessy, Dist. Man.
7801 Highway 301 N.
Tampa, FL 33610
813-985-7402
(Suncom 652-7270)

SOUTH FLORIDA DIST. BRANCH OFFICE

3201 Golf Course Blvd.
Punta Gorda, FL 33950
813-639-4967
(Suncom 552-7636)

SOUTH FLORIDA DIST.

Philip R. Edwards, Dist. Man.
2269 Bay St.
Fort Myers, FL 33901
813-332-2667
(Suncom 552-7900)

SOUTH FLORIDA DIST. BRANCH OFFICE

11400 Overseas Highway
Suites 219-224
Marathon, FL 33060
305-743-6955/9261

SOUTHEAST FLORIDA SUBDIST.

Al Mueller, Subdist. Man.
2745 S.E. Morningglade Blvd.
Port St. Lucie, FL 33482
305-878-3890
(Suncom 451-5053)

SOUTHEAST FLORIDA DIST.

Roy Duke, Dist. Man.
3301 Gun Club Rd.
P.O. Box 3858
W. Palm Beach, FL 33402
305-689-5800
(Suncom 451-5005)

DISTRICT SUBDISTRICT

&

BRANCH OFFICES

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301
904-488-4805

IV. GENERAL PROCEDURES (CONT'D)

10. (cont'd)

USEPA. The report must include:

- (i) Name, address, and telephone number of the owner or operator;
- (ii) Name, address, and telephone number of the facility;
- (iii) Date, time, and type of incident (e.g., fire, explosion);
- (iv) Name and quantity of material(s) involved;
- (v) The extent of injuries, if any;
- (vi) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

V. SPECIFIC EMERGENCY PROCEDURES

Fire

Facility personnel have received fire protection training and will be the initial action group in the event of a fire. They will:

1. Sound the fire alarm.
2. Use the nearest fire extinguisher and attempt to put out the fire: ONLY IF SMALL AND HANDLEABLE.
3. Inform the Emergency Coordinator.

The Emergency Coordinator will:

1. Account for all personnel.
2. Assess information and determine the next step:
 - a. Call local fire department.
 - b. Secure plant activities.
 - c. Establish fire containment operation.
 - d. Arrange for needed medical attention.
 - e. Begin relocating any threatened chemicals or loaded equipment that might add to fire.

Upon arrival of the local fire department, the Emergency Coordinator's posture shifts to a support position and provides technical information or other assistance requested by fire department personnel.

When the fire department sounds an "all-clear" signal:

1. Clean-up activity begins.
2. Extent of damage is determined and reports prepared.
3. All emergency equipment used is inspected and cleaned.
4. All fire-fighting supplies consumed are resupplied.

V. SPECIFIC EMERGENCY PROCEDURES (CONT'D)

Spills

Because this facility deals with only containerized spent solvents as hazardous wastes, the amount of material potentially released from one container is small. Whether a spill from one drum or the 10% of the total permitted inventory is involved, there will be required an initial evaluation by the Emergency Coordinator of the magnitude and scope of the release including type of material released and rate of release, any injuries involved, direction in which the material or any vapors is heading, extent of damage to equipment or structures and whether or not material is contained within existing dikes.

If the material release involves an ignitable substance, hazards of fire and vapor emission are increased. The Emergency Coordinator will evaluate the situation for a determination on whether or not to discontinue any welding, cutting or grinding operation or to disconnect electrical services to the area.

The Emergency Coordinator's assessment of the incident will include a decision on whether or not the accident can be contained by the facility emergency response team. If the incident is within the plant's capability, the Emergency Coordinator will contact and deploy plant personnel.

If additional emergency response/spill control assistance is needed, the Emergency Coordinator will call in outside units. One or more contractors specializing in emergency response/spill control/spill

V. SPECIFIC EMERGENCY PROCEDURES (CONT'D)

clean up work are listed under "Emergency Telephone Numbers".

The initial response to the emergency, whether performed by plant personnel, by spill contractors units or by a combination of the two, will be to protect health and safety and to minimize the environmental impact. Spill control and clean up equipment are available on site. Locations of spill control equipment are designated on the emergency response blueprint.

EMERGENCY TELEPHONE NUMBER

A. EMERGENCY RESPONSE AGENCIES AND ORGANIZATIONS

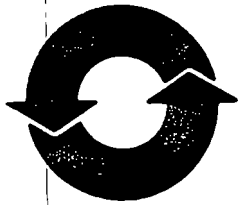
| | |
|--|--------------|
| Florida Bureau of Disaster Preparedness | 904/488-1320 |
| | 904/488-1900 |
| Florida Department of Environmental Regulation | 904/488-0300 |
| Tampa Police Department | 813/247-6411 |
| Tampa Fire Department | 813/223-5544 |
| Brandon Community Hospital | 813/681-5551 |
| Ambulance | 813/681-4422 |
| U. S. Coast Guard | 202/426-2675 |
| CHEMTREC | 800/424-9300 |

B. NEIGHBOR

| | |
|------------------------------|--------------|
| Mineral Aggregates Co., Inc. | 813/677-9168 |
|------------------------------|--------------|

C. OUTSIDE CONTRACTORS

| | |
|---|--------------|
| Resource Recovery of America, Inc. Mulberry, Florida | 813/425-1084 |
| International Solvent Recovery, Inc. Barton, Florida | 813/533-8143 |
| Chemical Waste Management, Inc. Pompano Beach, Florida | 404/952-0444 |



**RESOURCE
RECOVERY
OF AMERICA, INC.**

July 10, 1984

Mr. Donald Black
MCKESSON CHEMICAL COMPANY
136 Summit Avenue
Montvale, New Jersey 07645

Dear Mr. Black:

Thank you for your interest in our company. We would appreciate the opportunity to work for you and the McKesson group on your hazardous waste compliance requirements.

As I explained, we can provide you with back-up transportation, spill clean-up, disposal, recycling, a waste exchange program or tank cleaning services.

Our costs will vary depending on the job but will basically be around \$100.00 plus or minus per 55 gallon; including transportation and disposal. Non-hazardous wastes will be less.

Please find enclosed copies of our permits and a letter from the Florida Department of Environmental Regulations stating our compliance to the current regulations.

Should you have any questions or require additional information please contact us at (813) 425-1084.

Again, thank you. It would be our privilege to work with you.

Sincerely,

Robert O. Kincart
RESOURCE RECOVERY OF AMERICA, INC.

ROK/ljh

South Carolina Department of Health and Environmental Control

2600 Bull Street
Columbia, S.C. 29201

Commissioner
Robert S. Jackson, M.D.



Board
Moses H. Clarkson, Jr., Chairman
Leonard W. Douglas, M.D., Vice-Chairman
Barbara P. Nussle, Secretary
Gerald A. Kaynard
Oren L. Brady, Jr.
James A. Spruill, Jr.
William H. Hester, M.D.

OFFICE OF ENVIRONMENTAL QUALITY CONTROL BUREAU OF SOLID & HAZARDOUS WASTE MANAGEMENT

Hazardous Waste Transporter Permit

Date of Issue: February 29, 1984 Expiration Date: March 1, 1987

Permit Number: 980602734 T

Permission is hereby granted to:

Name of transporter: Resource Recovery of America, Inc.
Address: 2300 Highway 60 West
Milberry, FL 33860
Supervisor: Robert O. Kincart
Phone: (813) 425-1084

for the operation as a transporter of hazardous waste located in Mulberry, FL.

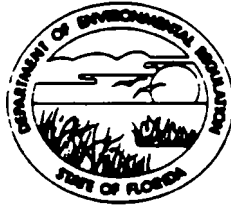
This permit is issued pursuant to Section 44-56-10 et seq. of the 1976 South Carolina Code of Laws, as amended, and South Carolina Rule(s) and Regulation(s) 61.79. The authority granted hereunder is subject to the requirements of the aforementioned laws and regulations and the following conditions:

(See attached list of conditions)

Hartsill W. Truesdale
Hartsill W. Truesdale, P.E. Director
Division of Facility Engineering
Bureau of Solid & Hazardous Waste
Management

This permit is non-transferable and is the property of the Bureau of Solid and Hazardous Waste Management and must be surrendered on demand. Keep posted at all times in a conspicuous place on the premises.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610-9544

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

WILLIAM K. HENNESSEY
DISTRICT MANAGER

June 21, 1983

Mr. Robert O. Kincart
Resource Recovery of America, Inc.
2300 Highway 60, West
Mulberry, Florida 33860

Dear Mr. Kincart:

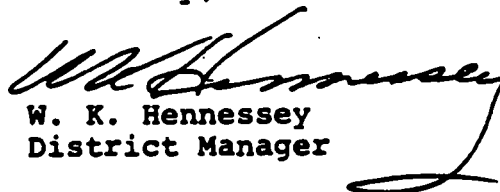
This letter is to recap our meeting of June 15, 1983. At that time you expressed a concern as to how this agency was handling the permitting of waste oil dealers.

Resource Recovery of America, Inc., has recently constructed the Mulberry facility with full environmental permitting from this agency. The site was reviewed for compliance with industrial waste, hazardous waste, and stormwater regulations. Being the newest, this facility is the first in this district to submit to this type review and permitting.

This Department fully intends to address the pre-existing waste oil facilities to bring them into compliance with the same standards and rules.

The efforts of your firm are appreciated, and we are grateful for the interest you have shown for protection of the environment.

Sincerely,


W. K. Hennessey
District Manager

WKH/jdj

STATE OF FLORIDA
DEPARTMENT OF REVENUE
DEALER'S LICENSE

Nº 10760

Special Fuels

This license must be displayed in open view
at all times at the DEALER'S office or
principal place of business.

Tallahassee, Florida, May 1, 19 83

Having furnished application and surety bond and paying the required fee as provided by the
provisions of Chapter 206, Florida Statutes,

Resource Recovery of America, Inc.

whose office or principal place of business is Mulberry, FL

is hereby issued this license as a Dealer in Special Fuels, in the State of Florida. This license is
NOT TRANSFERABLE but will continue in full force and effect until cancelled or revoked as
provided by law.

DEPARTMENT OF REVENUE

This license must be returned to the Department of Revenue
when the licensee terminates his operation as a Dealer.


Executive Director



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for
the installation located at the address shown in the box below to comply with Section 3010
of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number
for that installation appears in the box below. The EPA Identification Number must be in-
cluded on all shipping manifests for transporting hazardous wastes; on all Annual Reports
that generators of hazardous waste, and owners and operators of hazardous waste treatment,
storage and disposal facilities must file with EPA; on all applications for a Federal Hazard-
ous Waste Permit; and other hazardous waste management reports and documents required
under Subtitle C of RCRA.

EPA I.D. NUMBER

FL0980602734

INSTALLATION ADDRESS

RESOURCE RECOVERY OF AMERICA INC
100 14TH AVE SOUTH
SE PETERSBURG FL 33701

2300 HWY 60 WEST
MULBERRY FL 33600

In accordance with 40CFR Sections 264.37, 264.53, 265.37 and 265.53, the RCRA Act of 1980, this letter of transmittal to:

HUMANANA HOSPITAL BRANCH
ORGANIZATION

J.P. Kessner, Jr. CYCC O.C.
PERSON/POSITION

11/27/84
DATE

indicates receipt of the facility Contingency/Employee Emergency Response Plan by your agency which is designated as the (primary) ~~(alternate)~~ source for emergency ~~(fire)~~ ~~(police)~~ (medical) assistance for our facility.

Our facility routinely handles regulated hazardous chemicals in bulk and packaged form, as well as stores drummed hazardous waste materials. The Facility Contingency/Employee Emergency Response Plan contains:

- 1) the location and schematic layouts of our facility to include the location of all regulated hazardous chemical and hazardous waste material storage
- 2) a listing of our key employees and their residence phone numbers who are authorized to act in behalf of the company as primary and alternate emergency coordinators
- 3) other schematic layouts showing the normal working places of our employees, the identification and location of our major items of emergency equipment, our mechanical and electrical service controls, as well as entrances/exits and possible evacuation routes.
- 4) Further, technical information and manufacturers' material safety data sheets are included for all major regulated hazardous chemicals and hazardous waste materials normally in storage. These describe the properties of those materials, their effect on human life and the environment, as well as the recommended fire-fighting techniques and emergency medical treatment required in an actual emergency.

It is our legal responsibility to continue to keep you informed of any revisions to this plan.

J.P. Kessner, Jr.
Branch Operations Manager



Serving the Nation
Since 1831

In accordance with 40CFR Sections 264.37, 264.53, 265.37 and 265.53, the RCRA Act of 1980, this letter of transmittal to:

HILLSBOROUGH CO.

FIRE DEPT.
ORGANIZATION

Capt. P.J. Karbon
PERSON POSITION

12/6/84
DATE

indicates receipt of the facility Contingency/Employee Emergency Response Plan by your agency which is designated as the (primary) ~~(alternate)~~ source for emergency (fire) ~~(police)~~ ~~(medical)~~ assistance for our facility.

Our facility routinely handles regulated hazardous chemicals in bulk and packaged form, as well as stores drummed hazardous waste materials. The Facility Contingency/Employee Emergency Response Plan contains:

- 1) the location and schematic layouts of our facility to include the location of all regulated hazardous chemical and hazardous waste material storage
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- 4) Further, technical information and manufacturers' material safety data sheets are included for all major regulated hazardous chemicals and hazardous waste materials normally in storage. These describe the properties of those materials, their effect on human life and the environment, as well as the recommended fire-fighting techniques and emergency medical treatment required in an actual emergency.

It is our legal responsibility to continue to keep you informed of any revisions to this plan.

P.J. Karbon
Branch Operations Manager

M-Kesson

In accordance with 40CFR Sections 264.37, 264.53, 265.37 and 265.53, the RCRA Act of 1980, this letter of transmittal to:

HILLSBOROUGH COUNTY
SHERIFF'S OFFICE
ORGANIZATION

LT. TED GILSON
PERSON/POSITION

5 Dec 84
DATE

indicates receipt of the facility Contingency/Employee Emergency Response Plan by your agency which is designated as the (primary) ~~(alternate)~~ source for emergency ~~(fire)~~ (police) ~~(medical)~~ assistance for our facility.

Our facility routinely handles regulated hazardous chemicals in bulk and packaged form, as well as stores drummed hazardous waste materials. The Facility Contingency/Employee Emergency Response Plan contains:

- 1) the location and schematic layouts of our facility to include the location of all regulated hazardous chemical and hazardous waste material storage
- 2) a listing of our key employees and their residence phone numbers who are authorized to act in behalf of the company as primary and alternate emergency coordinators
- 3) other schematic layouts showing the normal working places of our employees, the identification and location of our major items of emergency equipment, our mechanical and electrical service controls, as well as entrances/exits and possible evacuation routes.
- 4) Further, technical information and manufacturers' material safety data sheets are included for all major regulated hazardous chemicals and hazardous waste materials normally in storage. These describe the properties of those materials, their effect on human life and the environment, as well as the recommended fire-fighting techniques and emergency medical treatment required in an actual emergency.

It is our legal responsibility to continue to keep you informed of any revisions to this plan.


Branch Operations Manager



Serving the Nation
Since 1813

V. SPECIFIC EMERGENCY PROCEDURES (CONT'D)

Clean-up

Any portable equipment that has become contaminated by use during an emergency will be placed in a metal drum and steam-cleaned. All condensate will be collected and treated as a hazardous waste. Any larger equipment (e.g., a forklift blade) will be similarly cleaned inside the secondary containment area and the condensate collected.

Any contaminated absorbent material or chemical used in clean-up will be collected in an appropriate container and treated as a hazardous waste.

VI. EVACUATION PROCEDURES

A fire at the branch or a major spill or overflow of hazardous waste or hazardous material from its storage area will implement the branch's evacuation plan. It is the responsibility of the Emergency Coordinator to determine whether its severity of the incident warrants evacuation of the branch's personnel. The decision for evacuation of the nearby industries off property will be made by the responsible local or state police or fire organizations.

Personnel are trained to assemble at a specific location on the branch property after receiving an emergency alarm signal. Plant personnel will bring along to the assembly area any suppliers, contractors, or visitors in their areas. Evacuation routes from various branch work areas are shown on the emergency response blueprint.

Specific evacuation steps are:

1. The Emergency Coordinator will announce plant evacuation by voice alarm or the internal telephone system.
2. One person from the office will be dispatched to the main entrance gate. The gate will be set in the full open position. No entry will be allowed by visitors, truckers, contractors or suppliers.
3. Personnel will assemble at their assigned area. The Emergency Coordinator will check off to account for all personnel, including visitors. Visitors will be sent off site immediately after completion of the head count check.
4. Missing person situations will be evaluated by the Emergency Coordinator and other personnel who were working

VI. EVACUATION PROCEDURES (CONT'D)

4. (cont'd)

in the area or in an adjacent area. Telephone contact will be attempted in the event the initial signal was not heard. Re-entry into an emergency area to search for missing persons is allowed only if the search would not endanger lives

VII EMERGENCY EQUIPMENT

There are two types of emergency equipment at this DSW, Inc. branch.

A. That which is "built-in" to the branch:

Safety shower

Nearest located on other side of fire wall; tied into county water pressure.

Fire hydrant

Located across Route 41A at west end of property.

Alarm system

(a) manual fire alarm, station located inside warehouse on north wall; (b) three alarm horns in ceiling of warehouse, sounding warning blasts activated by button on telephone.

Communication system

Conventional telephone with connected alarm system as previously noted.

Fire hoses

Two in warehouse proper; locations noted on emergency response blueprint.

B. That which is portable:

Fire extinguishers

Seven in warehouse building, locations as noted in emergency response blueprint; 20 lb. BC capacity.

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SEPT. 22, 1986

VII. EMERGENCY EQUIPMENT (CONT'D)

B. That which is portable (cont'd)

First Aid Kits

Two Zee kits within reach of storage area - one in adjacent repack room and one in Operation Manager's office.

Emergency pallets

On "A" pallet:

1. Rubber suits - 2
2. Rubber boots - 2 pairs
3. Rubber gloves - 2 pairs
4. Soda ash - 10/100 lb. bags, to neutralize acidic materials
5. Citric acid - 5/100 lb. bags, to neutralize alkaline materials
6. Inert absorbent material - 10/50 lb. bags, to absorb spilled liquids
7. Shovels - 2
8. Brooms - 2
9. Flashlights - 2
10. Rakes - 2
11. Pick axe - 1

On "B" pallet:

1. Scott Air Pak, self-contained breathing apparatus, 30-minutes
2. Recovery drums - 2/80 gal. capacity

DSW, Inc.

Procedures, Structures, Equipment

The hazardous waste management activities undertaken at this facility of DSW, Inc. is that only of temporary storage of drummed solvents which are defined as hazardous wastes. There is but one location at the facility which is utilized for loading and unloading of materials received from off-site generators. The loading/unloading area is designated on the facility diagram.

This facility receives less than truckload quantities of waste materials from off-site generators and temporarily stores them in order to accumulate economical truckloads of these materials to warrant the distances involved in reaching the recycling centers to which these waste materials are ultimately destined.

The amount of handling of the drummed materials while at the facility is kept to an absolute minimum to minimize the likelihood of damage and possible release. Once trucks carrying waste materials are at the dock area and secured by means of wheel chocks, forklifts are utilized to transfer the drums from the truck onto wooden pallets in the staging area at the loading and unloading area. Drums are placed four to a pallet, and once the necessary administrative procedures and verification counts have been made as outlined under "Containment Management Practices", full pallets are carried by forklift to the designated storage area where they remain on the pallet. While in storage, the drums are inspected in accordance with the inspection schedule listed in Table A. Sufficient spacing around each pallet of drums is maintained to ensure the avoidance of damaging drums while placing pallets adjacent to another.

* Of the Inspection Schedule.

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SEPT. 22, 1986

Once an economic truckload quantity of material is accumulated, the full pallets of drums are brought to the staging area at the dock, prepared for shipment, and placed onto the vehicle transporting them to the recycling center. Because of the minimal handling during the materials presence at the facility site, the likelihood of spills is minimal, but should an incident occur, spilled material would be contained and picked up by use of Hazorb or other industrial absorbents which are readily available at the site. Any contaminated material shall be picked up and placed in an open-head drum compatible with the material, and sent to a properly permitted disposal facility.

Ground water contamination is prevented at this facility by assuring that all containers of waste materials are stored in a closed, good quality drum, and remain at all times in the designated hazardous waste storage area which has the secondary containment system protection described in detail in the section entitled "Secondary Containment System Design and Operation". The design, operation, inspection, and construction of this area is such as to minimize the threat of possible ground water contamination.

Because of the absence of process operations at this facility in which an equipment or power failure could cause a threat to human health or the environment, the impact of such an occurrence would be negligible. However, in the event that loading or unloading activities might be under way during a power failure, and the available light were of an insufficient nature to safely complete the task, operations shall be

ceased until the power company is notified and the cause of the failure discovered and repaired. Any problems which might be isolated to a specific area of the facility or a particular machine shall be brought to the manager's attention for corrective actions with support from Regional Operations if required.

Because the hazardous wastes to be handled at this facility are only "used" versions of the solvents which are routinely handled at the location in their virgin form, no particular hazards to either equipment, personnel or the environment are anticipated. Warehouse personnel wear durable work clothing gloves and hard hats while handling drums or pallets of drums. All loading and unloading of drums of hazardous waste is done within the warehouse, so any accidental spill or leaks, being handled immediately, poses no threat to water supplies. The hazardous waste storage area is bounded by a 3.5-inch curb, so no run-off to other areas of the warehouse can occur. Because the storage area is inside the warehouse, no flooding from storm-water run-off can occur. Prevention of ignition is described in the next section.

DSW, Inc. branches maintain on-site Material Safety Data Sheets for the products which they distribute. Example of Material Safety Data Sheets for virgin solvents follow; the safety precautions and practices apply to the same materials in waste form. These data sheets are kept on file and are updated routinely so that branch personnel have accurate information available regarding toxicity, fire and explosion hazards,

REVISED
SEPT. 22, 1986

DSW, Inc.

Procedures, Structures, Equipment
Page 4.

protective equipment recommendations, and first aid. Available protective and emergency equipment which is kept at the facility is presented in the section entitled "Contingency Plan". Use of personal protective equipment is strictly enforced and is covered in the employees' initial training, as well as being reinforced on a routine basis in monthly safety meetings which are conducted by the facility management.

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SEPT. 22, 1986



MATERIAL SAFETY DATA SHEET

(Approved by U.S. Department of Labor "Essentially Similar" to Form LSB-003-4)



CHEMICAL NAME: ETHYL ACETATE, 85-90% - DENATURED

SYNONYMS: Acetic Acid, Ethyl Ester;
Ethyl Ethanoate; Acetic Ester

CHEMICAL FAMILY: Esters

FORMULA: $\text{CH}_3\text{COOC}_2\text{H}_5$

MOLECULAR WEIGHT: 88.11

TRADE NAME AND SYNONYMS: Ethyl Acetate

I. PHYSICAL DATA

| | | | |
|---|---|---|-----------|
| BOILING POINT, 760 mm. Hg | 75°C. (167°F.) | FREEZING POINT | <-100°C. |
| SPECIFIC GRAVITY ($\text{H}_2\text{O} = 1$) | 0.884 at 20/20°C. | VAPOR PRESSURE at 20°C. | 69 mm. Hg |
| VAPOR DENSITY (air = 1) | 3.04 | SOLUBILITY IN WATER, % by wt. at 20°C. | 22 |
| PER CENT VOLATILES BY VOLUME | 100 | EVAPORATION RATE (Butyl Acetate = 1) | 6.15 |
| APPEARANCE AND ODOR | Water-white liquid; esteric, fruity odor. | | |

II. HAZARDOUS INGREDIENTS

| MATERIAL | % | TLV (Units) |
|----------------|---|-------------|
| Not applicable | | |
| | | |
| | | |
| | | |
| | | |

III. FIRE AND EXPLOSION HAZARD DATA

| | | | | | |
|---------------------------------------|---|-----------------------------|-----|--------|-----|
| FLASH POINT (test method) | 56°F., Tag open cup | AUTOIGNITION TEMPERATURE | | 800°F. | |
| FLAMMABLE LIMITS IN AIR, % by volume | | LOWER | 2.5 | UPPER | 9.0 |
| EXTINGUISHING MEDIA | Carbon dioxide or dry chemical for small fires. Ordinary foam for large fires. | | | | |
| SPECIAL FIRE FIGHTING PROCEDURES | None | | | | |
| UNUSUAL FIRE AND EXPLOSION HAZARDS | None | | | | |

EMERGENCY PHONE NUMBERS

Dr. C. U. Dernehl, 212/551-4785; 914/946-0646 (night)
Dr. K. S. Lane, 212/551-4787; 914/666-3656 (night)
C. P. Carpenter, Ph.D., 412/327-1020; 412/241-7896 (night)

Legal responsibility is assumed only for the fact that all studies reported here and all opinions are those of qualified experts.

UNION CARBIDE CORPORATION • CHEMICALS AND PLASTICS • 270 PARK AVENUE, NEW YORK, N.Y. 10017

IV. HEALTH HAZARD DATA

| | |
|------------------------------------|--|
| THRESHOLD LIMIT VALUE | 400 ppm. |
| EFFECTS OF OVEREXPOSURE | Headache, nausea, vomiting, and narcosis. |
| EMERGENCY AND FIRST AID PROCEDURES | Move to fresh air and call a physician. If swallowed, induce vomiting and call a physician. Flush skin and eye contact with water. |

V. REACTIVITY DATA

| | | | |
|--------------------------------------|----------------|--|------------------------------------|
| STABILITY | | CONDITIONS TO AVOID | Heat and fires. |
| UNSTABLE | STABLE | | |
| — | ✓ | | |
| INCOMPATIBILITY (materials to avoid) | | Strong alkalis. | |
| HAZARDOUS DECOMPOSITION PRODUCTS | | Thermal decomposition may produce carbon monoxide and/or carbon dioxide. | |
| HAZARDOUS POLYMERIZATION | | CONDITIONS TO AVOID | Contamination with strong alkalis. |
| May Occur | Will not Occur | | |
| — | ✓ | | |

VI. SPILL OR LEAK PROCEDURES

| | |
|--|------------------------------------|
| STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED | Flush with large volumes of water. |
| WASTE DISPOSAL METHOD | Incinerate in a furnace. |

VII. SPECIAL PROTECTION INFORMATION

| | | | |
|---------------------------------------|----------------------|---|------------------------|
| RESPIRATORY PROTECTION (specify type) | | Air-supplied mask for vapors above 2% by volume | |
| VENTILATION | LOCAL EXHAUST | Preferable | SPECIAL None |
| | MECHANICAL (general) | Acceptable | OTHER None |
| PROTECTIVE GLOVES | | — | EYE PROTECTION Goggles |
| OTHER PROTECTIVE EQUIPMENT | | Safety shower and eye bath | |

VIII. SPECIAL PRECAUTIONS

| | |
|---------------------------------------|---|
| PRECAUTIONARY LABELING | ETHYL ACETATE, 85-90% — DENATURED WARNING! FLAMMABLE. BREATHING OF VAPOR MAY BE HARMFUL. Keep away from heat, sparks, and fire. Do not leave container open. Use with adequate ventilation. Avoid breathing of vapor. Avoid prolonged or repeated contact with skin. FOR INDUSTRY USE ONLY |
| OTHER HANDLING AND STORAGE CONDITIONS | — |

U.S. DEPARTMENT OF LABOR

WAGE AND LABOR STANDARDS ADMINISTRATION Bureau of Labor Standards

MATERIAL SAFETY DATA SHEET

SECTION I

| | | |
|--|---|---|
| MANUFACTURER'S NAME PPG Industries, Inc. | | EMERGENCY TELEPHONE NO. (318) 882-1200 |
| ADDRESS (Number, Street, City, State, and ZIP Code) No. 1 Gateway Center, Pittsburgh, Pa. 15222 | | |
| CHEMICAL NAME AND SYNONYMS Trichlorethylene - Trichloroethylene | TRADE NAME AND SYNONYMS Trichlor | |
| CHEMICAL FAMILY Chlorinated Solvents | FORMULA $\text{CCl}_2 = \text{CHCl}$ | |

| PAINTS, PRESERVATIVES, & SOLVENTS | % | TLV (Units) | ALLOYS AND METALLIC COATINGS | % | TLV (Units) |
|---|-----|----------------|---|---|----------------|
| PIGMENTS | | | BASE METAL | | |
| CATALYST | | | ALLOYS | | |
| VEHICLE | | | METALLIC COATINGS | | |
| SOLVENTS | 100 | 100 | FILLER METAL PLUS COATING OR CORE FLUX | | |
| ADDITIVES | | | OTHERS | | |
| OTHERS | | | | | |
| HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES | | | | % | TLV (Units) |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

| | | | |
|-------------------------|---------------------------------|---|------|
| BOILING POINT (°F.) | 188.4 | SPECIFIC GRAVITY ($\text{H}_2\text{O}=1$) | 1.46 |
| VAPOR PRESSURE (mm Hg.) | 58 | PERCENT VOLATILE BY VOLUME (%) | 100 |
| VAPOR DENSITY (AIR=1) | 4.54 | EVAPORATION RATE (<u>ether</u> = 1) | 0.28 |
| SOLUBILITY IN WATER | Negligible | | |
| APPEARANCE AND ODOR | Clear, colorless, ethereal odor | | |

| | | | |
|---|--|------------------|--------------|
| SECTION IV - FIRE AND EXPLOSION HAZARD DATA | | | |
| FLASH POINT (Method used) | None (Tag, open or closed) | FLAMMABLE LIMITS | LeI UeI |
| EXTINGUISHING MEDIA | | | |
| SPECIAL FIRE FIGHTING PROCEDURES | Vapors can be ignited only by high intensity source of ignition. Combustion forms HCl and possible traces of phosgene. | | |
| UNUSUAL FIRE AND EXPLOSION HAZARDS | | | |

SECTION V. HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE 100

EFFECTS OF OVEREXPOSURE Loss of coordination and equilibrium to actual consciousness, and even death, in unventilated areas (such as tanks).

EMERGENCY AND FIRST AID PROCEDURES

Move to fresh air, use artificial respiration if breathing has stopped. Administer oxygen after breathing has been restored. (Never administer adrenalin!) Call physician (he should not administer adrenalin).

SECTION VI. REACTIVITY DATA

| | | | |
|---|----------------|---|---------------------|
| STABILITY | UNSTABLE | | CONDITIONS TO AVOID |
| | STABLE | X | |
| INCOMPATIBILITY (Materials to avoid) Avoid mixing with caustic soda and caustic potash. | | | |
| HAZARDOUS DECOMPOSITION PRODUCTS HCl and possible traces of phosgene | | | |
| HAZARDOUS POLYMERIZATION | MAY OCCUR | | CONDITIONS TO AVOID |
| | WILL NOT OCCUR | X | |

SECTION VII. SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Adequate ventilation must be provided.

Workmen should be provided with fresh air masks or sent to fresh air.

WASTE DISPOSAL METHOD

Forced ventilation or evaporation

SECTION VIII. SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)

Fresh air masks when necessary

VENTILATION

LOCAL EXHAUST

Sufficient to maintain TLV

SPECIAL

MECHANICAL (General)

OTHER

PROTECTIVE GLOVES

Neoprene or Viton

EYE PROTECTION

Glasses or goggles

OTHER PROTECTIVE EQUIPMENT

Neoprene apron

SECTION IX. SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

OTHER PRECAUTIONS

WAGE AND LABOR STANDARDS ADMINISTRATION
Bureau of Labor Standards

MATERIAL SAFETY DATA SHEET

SECTION I

| | | |
|---|--|--|
| MANUFACTURER'S NAME PPG Industries, Inc. | | EMERGENCY TELEPHONE NO. (318) 882-1200 |
| ADDRESS (Number, Street, City, State, and ZIP Code) One Gateway Center, Pittsburgh, Pa. 15222 | | |
| CHEMICAL NAME AND SYNONYMS Methylene Chloride, dichloromethane | | TRADE NAME AND SYNONYMS Methylene Chloride |
| CHEMICAL FAMILY Chlorinated Hydrocarbons | FORMULA CH₂Cl₂ | |

| PAINTS, PRESERVATIVES, & SOLVENTS | % | TLV (Units) | ALLOYS AND METALLIC COATINGS | % | TLV (Units) |
|---|-----|----------------|---|---|----------------|
| PIGMENTS | | | BASE METAL | | |
| CATALYST | | | ALLOYS | | |
| VEHICLE | | | METALLIC COATINGS | | |
| SOLVENTS | 100 | 500 | FILLER METAL PLUS COATING OR CORE FLUX | | |
| ADDITIVES | | | OTHERS | | |
| OTHERS | | | | | |
| HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES | | | | % | TLV (Units) |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

| | | | |
|-------------------------|------------|---|-------|
| BOILING POINT (°F.) | 104 | SPECIFIC GRAVITY (H ₂ O=1) (25/25°C) | 1.320 |
| VAPOR PRESSURE (mm Hg.) | 340 | PERCENT VOLATILE BY VOLUME (%) | 100 |
| VAPOR DENSITY (AIR=1) | 2.93 | EVAPORATION RATE (<u>ether</u> =1) | 0.71 |
| SOLUBILITY IN WATER | Negligible | | |
| APPEARANCE AND ODOR | | | |

SECTION II: FIRE AND EXPLOSION HAZARD DATA

| | | | |
|--|------------------|--------------------|--------------------|
| FLASH POINT (Method used) None (Tag, open or closed) | FLAMMABLE LIMITS | Lel None | Uel None |
| EXTINGUISHING MEDIA | | | |
| SPECIAL FIRE FIGHTING PROCEDURES | | | |
| UNUSUAL FIRE AND EXPLOSION HAZARDS | | | |

SECTION V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

500

EFFECTS OF OVEREXPOSURE

Loss of co-ordination and equilibrium to actual unconsciousness

and even death in unventilated areas (such as tanks).

EMERGENCY AND FIRST AID PROCEDURES

Move to fresh air, use artificial respiration if breathing has stopped. Administer oxygen after breathing has been restored.

(Never administer adrenalin.) Call physician (he should not administer adrenalin)

SECTION VI REACTIVITY DATA

STABILITY

UNSTABLE

CONDITIONS TO AVOID

Open flames and welding arcs -

STABLE

X

explosive mixtures with oxygen under pressure.

INCOMPATIBILITY (Materials to avoid)

HAZARDOUS DECOMPOSITION PRODUCTS

HCl and small amounts of phosgene.

HAZARDOUS
POLYMERIZATION

MAY OCCUR

CONDITIONS TO AVOID

WILL NOT OCCUR

X

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Adequate ventilation must be provided.

Workmen should be provided with fresh air masks or sent to fresh air.

WASTE DISPOSAL METHOD

Forced ventilation or evaporation

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)

Fresh air mask

VENTILATION

LOCAL EXHAUST

Sufficient to maintain TLV

SPECIAL

MECHANICAL (General)

OTHER

PROTECTIVE GLOVES

Neoprene or Viton

EYE PROTECTION

Glasses or goggles

OTHER PROTECTIVE EQUIPMENT

Neoprene apron

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

OTHER PRECAUTIONS

DSW, Inc.

Preparedness and Prevention

Communications - Internal communications rely on the telephone system and voice alerts. The telephone would be relied upon for summoning outside assistance, as spelled out in the Contingency Plan. All personnel have access to immediate contact with other employees during while working.

Fire extinguishers - Extinguishers are located, and maintained as described under Contingency Plan and Inspection Schedules.

Water supply - Water is supplied to the branch by the Riverview Water Plant of Hillsborough County Utilities. Management of that plant estimates that water pressure at DSW, Inc. is about 55 psi.

Aisle space - The layout of the small 19 foot x 21 foot secondary containment area permits unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment.

Arrangements with authorities - Upon approval of the Contingency Plan, copies will be distributed to local police, fire, hospital and emergency authorities to ensure their being aware of the DSW, Inc. installation and its activities.

DSW, Inc.

Personnel Training

DSW, Inc. is an established major distributor and repacker of a wide variety of industrial chemicals and solvents, many of which are hazardous (flammable, corrosive, toxic, oxidative); consequently, the Company has in place a training program designed to acquaint its employees with the dangers of these hazardous materials and to train them in their safe handling. The expansion of the branch's business to include the temporary storage of a limited variety of spent solvents, therefore, has had a solid foundation upon which to build the additional training needed for the handling of these hazardous wastes.

The approximately 70 branches of DSW, Inc. are divided into three Regions headquartered in Oak Brook, Illinois, Spartanburg, South Carolina, and Santa Fe Springs, California. Each Region in turn, is divided into Areas, which are composed of a number of Branches.

The organization structure of a typical DSW, Inc. branch is headed by a Manager, who is assisted by a Branch Operations Manager and a Branch Administrative Manager. The last two positions have staff manager counterparts at the Area office, who provide formal training for new employees and refresher training for present employees in their respective disciplines. Thus, in addition to the on-the-job training/experience acquired by an employee, he/she is assured a formal teaching exposure which is then documented in his/her record.

REVISED
SEPT. 22, 1986

The Manager of the Branch and Branch Administrative Manager are involved in compliance with RCRA regulations, but typically are not involved in the actual supervision of handling the wastes. That responsibility lies chiefly with the Branch Operations Manager, who is primarily involved with the handling and maintenance of waste materials while they are in storage at the branch. This position carries the responsibility of assuring that the routine inspections and physical handling procedures are adhered to. The Administrative Manager is involved with such paperwork such as that related to in-and-out shipments, inventory control, and maintenance of records involving hazardous wastes.

None of these individuals is required to be trained prior to employment in hazardous waste management situations. On-the-job training is accomplished within six months of employment by Branch Management and the Area RCRA Training Director on all facets of hazardous waste management. Responsibilities for hazardous waste management are not delegated until such training is completed.

Updating of the training of trained hazardous waste personnel is carried out at least annually.

The duties, responsibilities, and qualifications for these three management positions follow.

Position: Branch Manager

Responsibilities and Duties:

- Functions as Emergency Coordinator in the absence of appointed individual.
- Has overall responsibility for selection of personnel and supervision of training programs, including proper use of equipment, fire fighting equipment, alarm systems, emergency procedures, material management (including waste items), maintenance, Contingency Plan implementation, etc. The actual conducting of training in these areas may be delegated to other supervisory personnel, although the responsibility to assure its adequate completion remains the Branch Manager's.
- Supervises and oversees facility's ongoing safety program, which includes the assurance of the conducting of monthly safety meetings.
- Works in conjunction with Regional Office personnel in assuring the proper attainment of permits and licenses from local, state, and Federal agencies.
- Supervises branch sales personnel and the profitability of the facility. Works in resolving problems arising with potential customers wishing to utilize the Company's waste handling capabilities. Assures that customers and branch have appropriate permits and that all necessary and required data as set forth in the regulations and Company procedures are adhered to and

present at the location for proper management of materials.

- Addresses, and takes appropriate actions on problems brought to his attention by subordinates.
- Makes proper notification of emergency situations and/or implementation of the Contingency Plan to appropriate Company and government authorities as outlined in other sections.

Experience and Qualifications:

- High school graduate - college desirable
- 3-5 years sales or sales management experience with supervisory responsibilities.

Position: Branch Operations Manager

Responsibilities and Duties:

- Is usually the facility's Emergency Coordinator.
- Supervises overall operation and maintenance of the physical aspects of the facility in compliance with all applicable government regulations and Company operating procedures.
- Maintains facility compliance with RCRA and other governmental agency regulations specific to waste management practices.
- Maintains operational logs, maintenance records, inspection records, and conducts monthly safety meetings with branch operations personnel.
- Supervises loading/unloading of all materials (include wastes), placement of material, and required paperwork as required by Company procedures.
- Is involved in the training and indoctrination of new personnel at the branch facility.
- Notifies Branch Manager of emergency situations.
- Schedules all maintenance and repair of equipment and facility structure of both a routine and non-routine nature.
- Oversees the drivers' activities to assure compliance with all appropriate procedures for transporting of materials, accepting waste materials, response to emergency situations, and equipment maintenance.

DSW, Inc.

Personnel Training
Page 6.

- Monitors and approves the findings of waste container and emergency equipment inspections, and implements any necessary remedial activities if inspection reports warrant.
- Reports to the Branch Manager.

Experience and Qualifications:

- High school graduate
- 1-2 years of experience or training in transportation, handling of hazardous materials, and warehousing activities. Supervisory experience desirable.

REVISED
SEPT. 22, 1986

Position: Branch Administrative Manager

Responsibility and Duties:

- Supervises general office activities, including proper handling of paperwork involved in waste receipts and shipments as outlined by Company procedures.
- Notifies Branch Manager of emergency situations and may act as an alternate Emergency Coordinator in his or the Branch Operation Manager's absence.
- Assures that necessary reports, records, notifications, etc., are prepared to comply with RCRA, as well as all other government regulations. This include routine activities as well as non-routine occurrences, such as implementation of the facility Contingency Plan.
- Reports to the Branch Manager.

Experience and Qualifications:

- High school graduate
- 1-2 years in office related work with supervision experience desirable.

(INSTRUCTIONS ON PAGE FOUR)

| | | | |
|---|---|---------------------------|----------|
| INCUMBENT | A. | | |
| | TITLE Warehouseman | | NAME |
| | CORPORATE STAFF/COMPANY DSW, Inc. | | DIVISION |
| | DEPARTMENT | LOCATION "Your Branch" | DATE |
| TITLE | B. GENERAL STATEMENT OF POSITION FUNCTION | | |
| | A DSW, Inc. warehouseman is responsible to the Branch Operations Manager/Branch Manager for the safe, efficient performance of the functions assigned him. In order to carry out these responsibilities he must have completed the required written and driving tests and be qualified to operate a forklift truck. Upon completion of indoctrination and training he will perform his work in strict accordance with all safety, storage, and handling practices as required under O.S.H.A., the National Fire Protection Agency, the Environmental Protection Agency, the Food and Drug Administration, the Department of Transportation, and Company policy. All functions of loading, unloading, stacking, palletizing, storage and movements of material are to comply with Company standards. He will maintain cordial relationships with both internal and external sources in the best interest of the Company and perform his work to protect the public, his fellow workers, and the environment. | | |
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| | C. APPROVALS (Must be completed prior to recruiting, hiring, transfer or promotion into position - if used as personnel requisition) | | |
| | MANAGER | | DATE |
| | PERSONNEL DEPARTMENT | | DATE |
| | ORGANIZATION AND MANAGEMENT PLANNING (GRADE 18 AND ABOVE) | | DATE |
| COMPENSATION (To be completed by Personnel Department) | | | |
| GRADE LEVEL | DATE | BY | |

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SEPT. 22, 1986

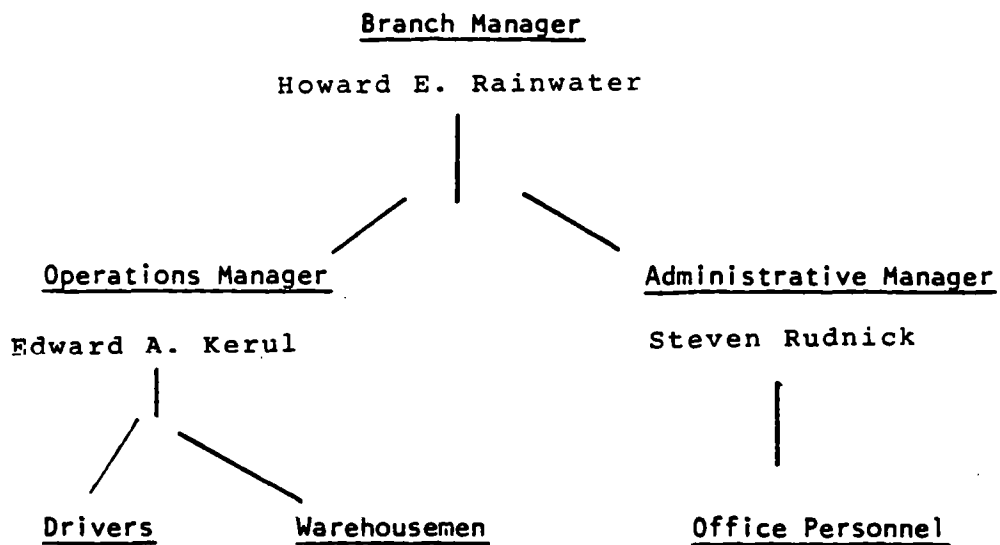
| D. POSITION SCOPE | | | |
|---|---|--------------------------|-----------------|
| REPORTS TO | NAME "Supervisor" | TITLE " | |
| SUPERVISES DIRECTLY | TITLE | NO. OF EMPLOYEES | |
| | TITLE | NO. OF EMPLOYEES | |
| | TITLE | NO. OF EMPLOYEES | |
| SUPERVISES INDIRECTLY (NUMBER OF EMPLOYEES) | | EXEMPT 0 | NON-EXEMPT 0 |
| FINANCIAL | | | |
| SALES/BUDGETS/PROFITS \$ | | ASSETS \$ | |
| RELATIONSHIPS | | | |
| INTERNAL | | EXTERNAL | |
| Branch Manager | | Customer | |
| Administrative - Operations Manager | | Other Branch's Employees | |
| Truck Drivers | | | |
| | | | |
| | | | |
| | | | |
| E. POSITION SPECIFICATIONS (Qualifications for job) | | | |
| EDUCATION/ KNOWLEDGE | Min. -- High School graduate or equivalent | | |
| EXPERIENCE | Min. -- 18 years of age. -- 6 months experience operating forklift. | | |
| SKILLS | --Capable of operating assigned forklift. --Successful completion of forklift written and skills exam. --Successful completion of lifting exam. --Successful completion of matching exam. --Complete training requirements of EPA regulations regarding loading/unloading, storing, and shipment of hazardous wastes. --Knowledgeable of D.O.T. regulations regarding loading, bracing, shipping, etc. | | |

| F. MAJOR RESPONSIBILITIES | WEIGHT (Importance) | STANDARDS OF PERFORMANCE (How responsibilities are measured) |
|----------------------------|------------------------|---|
| Warehousing | 40-50% | <p>--Responsible for all safety guidelines as outlined by Company policy and training (i.e. use of safety equipment, proper modes of operation and procedures, equipment inspections-- maintenance, etc.)</p> <p>--Full compliance with all DOT/EPA regulations as outlined in training sessions. All incidents of a nature requiring management attention are to be immediately reported to management for thorough investigation and necessary action.</p> <p>--Compatible storage of all materials at facility as dictated by Company standards and regulatory agencies.</p> <p>--Compliance with requirements for proper storage and monitoring of waste materials as outlined in EPA 40 CFR.</p> |
| Loading/Shipping/Receiving | 30-40% | <p>--Full compliance with DOT/EPA (governing waste and "virgin" material movements) and Company procedures for loading, bracing, offering appropriate placards, reviewing shipping papers (including manifests), handling internal paperwork, etc.; to effect legal and efficient movements of material.</p> |
| Maintenance | 5-10% | <p>--Adherence to forklift and other warehouse equipment P.M. programs as outlined by management.</p> <p>--Housekeeping within the branch facility to meet Company standards to protect the branch's assets from deterioration other than that of normal wear and tear.</p> |
| | 100 % | |

DSW, Inc.

Personnel Training

In case of the Tampa, Florida branch, the relevant organization chart is outlined below:



REVISED
SEPT. 22, 1986

All three management personnel have attended a DSW, Inc. hazardous waste training session led by Hal E. Brown, the Regional Warehousing manager, who is the Training Director for the Southeastern Region of the company.

Mr. Brown holds science degrees from the University of Pennsylvania and from Yale (Master's). He

has held his current position almost four years. In this capacity, he is responsible for all warehousing and related functions for the eleven branches comprising the Southeastern Region. This includes the drawing up of formal safety programs (training, safety meetings, direct mailing of safety literature, quarterly safety audits of each branch, analysis of each accident or near-accident with subsequent dissemination of details to the branches, accident investigations, application of disciplinary acts) as well as responsibility for purchasing, maintenance and training in the use of all warehouse and repacking machinery, specifying and purchasing containers and storage vessels used by the branch, as well as the repair and maintenance of the warehouse, yard, and repacking installation of each branch. It was only a short, logical step from these comprehensive responsibilities involving hazardous materials to the responsibilities required for the safe handling of hazardous wastes, which are essentially a "used" version of the materials routinely handled by each DSW, Inc. Branch.

He has attended a number of related seminars and training courses, such as the Hazardous Materials/Wastes Management Compliance Seminar conducted by Transportation Skills Program, Inc.

The training of the other branch personnel involved in the handling of hazardous waste - the warehousemen - is the responsibility of the local management, usually the Branch Operations Manager who had received his hazardous waste-related training from the Regional Training Director, who will have directed the initial training program at this branch. In his regular capacity as Regional Warehouse Manager, the Training Director will be aware of and assured that the technical competency of the Branch Operations Manager is adequate.

Outlines of the training programs for (1) the branch management and (2) the warehousemen follow.

Training sessions conducted with branch personnel involved with hazardous wastes typically involve a full day's session of classroom instruction. The topics reviewed at these sessions are designed to give a broad overview of the intent of the regulations, as well as explaining and training the employees in specific company procedures which had been developed for facilities to follow in order to comply with the requirements set forth in the regulations. Review is provided to the employees on registration of their particular branch for specific types of wastes. Frequent updates and advisories are forwarded from the Regional Office to keep employees current on hazardous waste regulations which might impact their branch's operations.

DSW, Inc. has adopted the appended training outlines for those branch personnel involved with hazardous waste - branch management as described previously and warehousemen ("hands-on personnel").

DSW, Inc. _____

Training Program Outline

(Revised)

A. Branch Management:

1. General Facility Considerations - Generators, Transporters, Permits, ID Numbers, Administrative Procedures.
2. Waste Analysis Responsibilities and Procedures.
3. Preparedness - Equipment, Communications, Emergency Prevention.
4. The contingency Plan - Responsibilities, Current Status, Procedures, the Emergency Coordinator, Distribution, Revisions.
5. Recordkeeping, the Operating Record, Inventory Control (Manual Cards).
6. Inspections - Inspection Log.
7. Security.
8. The Closure Plan, Financial Responsibilities.
9. Training, Responsibilities, Records, Role of Branch, Role of Area, Role of Region.
10. Handling Hazardous Waste, Containers, Storage, Inspections, Inventory, Ignitables.

The following areas were covered in training sessions during the week of October 8, 1984, on-site. With follow-up training the week of November 26, 1984, again on-site. The following personnel were present for training:

Ed Kerul - Oprs Mgr
Ed Collins - Whse/Blk Lqd Sup
Ron Gentry - Cl₂ Dept Mgr

Training was conducted by Howard E. C. (Hal) Brown, Atlanta Area Operations and Safety Manager.

REVISED
SEPT. 22, 1986

DSW, Inc.

Training Program Outline
Page 2.

B. Warehousemen

- 1. Orientation with Company Structure**
- 2. Safety Considerations, Safety Equipment Use and Maintenance,
Locations of Equipment.**
- 3. Warehouse Equipment, Forklifts, Pallets, Drum Grabbers, Dock
Plates.**
- 4. Paperwork, Hazardous Waste Manifests, Receiving Trickets.**
- 5. Emergency Response, Contingency Plan, Evacuation Plans.**
- 6. Housekeeping.**
- 7. Drum Handling, Drum Storing Techniques.**
- 8. Hazardous Waste Responsibilities, Manifests.**

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SEPT. 22, 1986

TRAINING GUIDE AND DOCUMENTATION
WAREHOUSEMEN

Employee Name _____

Instructor(s) _____

Date Hired _____

☐ Original Training

☐ Review

PRELIMINARY: Before actual training and work activity is undertaken by the new employee, management should be certain that all areas contained on PER-85 "Employment Checklist" have been completed and reviewed with the employee, and the appropriate signatures have been acquired

I. Employee General Orientation

The instructor shall review with the employee all items contained on PER-89, "Employee Orientation Checklist" as a general overview of basic Company and location policy. As required on PER-89, a six day follow-up/review should be conducted with the individual. See also the Chemical Operations Manual, Ref. 70.05 and 70.10.

II. Safety

NOTE: The instructor should refer to the Chemical Operations Manual, Ref. 10.06, "Training Employees", prior to starting training.

A. Company Safety Program (Ch. Op. Ref. 10.07)

1. Accident and Loss Prevention Policy (Ch.Op.Ref. 10.05).
2. Safety Audits.
3. Safety Committees (Ch. Op. Ref. 10.06).
4. Safety Meetings.
5. Required reporting of incidents or unsafe situations to supervisor.
6. Trained first aid personnel.
7. Smoking areas.

B. Emergency Response

1. Review of branch Emergency/Contingency Plans for various emergency situations. Show where plans are located throughout facility. Discuss evacuation signals, evacuation procedures, job

(Continued)

B. Emergency Response (Continued)

assignments in emergency situations; all as it applies to the trainee.

2. Review of procedure to be followed if trainee were to receive an emergency call regarding an off-site incident.
3. Review of Material Safety Data Sheets--information contained on form, location, etc.
4. CHEMTREC - review of organization and when contact appropriate (Ch. Op. Ref. 10.22).

C. Safety Equipment - Use and Maintenance

1. Discuss the appropriate conditions under which certain pieces of equipment must be used.
2. Review and demonstration of safety and emergency equipment present at branch. Instruction on appropriate use, inspection, maintenance, storage location, etc. A list of items to be reviewed should include but may not be limited to:

- a) Rubber Suits
- b) Rubber Boots
- c) Rubber Gauntlet Gloves
- d) Canvas Gloves
- e) Chemical Goggles
- f) Face Shields
- g) Hard Hats
- h) Fire Extinguishers (different types, sizes, locations, inspections, etc.) (Ch. Op. Ref. 80.01)
- i) First Aid Kits
- j) Neutralizer (limitations, locations)
- k) Safety Shower

(Continued)

C. Safety Equipment - Use and Maintenance (Continued)

- l) Recovery Drums (review the need for labeling, marking)
- m) Chlorine Kit
- n) Assorted tools which may be used in emergency situations. Review spark-proof tool usage in appropriate situations.
- o) Hazorb, absorbents
- p) Other articles at location

3. Review and demonstration of the various types of respiratory protective equipment present at your location. Discuss the proper selection, inspection, capabilities and limitations, maintenance, storage, etc., of a particular unit. (Ch. Op. Ref. 10.80)
Review those appropriate to location:

- a) Self-contained units (Air Packs)
- b) Canister type respirators -- review various canisters, shelf life of canisters, etc.
- c) Gas masks
- d) Dust Masks
- e) Other

4. Review the documentation of inspection of all safety equipment and the importance of notification to supervisor of use of air packs, extinguishers, etc., so that recharging or replacement is made.

(Continued)

III. Utilization and Maintenance of Warehouse Equipment

- A. Review various warehouse equipment which is present at location. Discussion should be included on selection, use, load limitations, and maintenance of all items. A partial listing would include but not be limited to the following:

1. Sweeper
2. Scrubber

NOTE: Regarding the above items, if battery powered units are present, demonstration should be given on how to properly connect unit to charger, along with routine maintenance procedures such as filter checks, brush replacement, cleaning, cleaner usage, etc.

3. Lift-O-Matic
4. Pallets - different sizes and uses. Do not allow overhang if possible. Discuss maintenance and out of service conditions for pallets. Review the dedication of pallets for USP and Poison material.
5. Pallet Pullers
6. Pallet Trucks
7. Dock Plates, Levelers, Bumpers, Seals
8. Pallet Racks - discuss the importance of compatibility of materials in racks, load limits (typically 6000#/shelf), maintaining of heavier load low, use of good quality pallets and appropriately sized, keeping of liquid items from being stored above dry materials to guard against ruining of dry materials in the event of leaks.
9. Wheel chocks (truck and rail)
10. Trailer jacks
11. Derails and warning signs
12. Car movers
13. Rail car door pullers
14. Trailer straps, load bars, blocking and bracing materials.

(Continued)

15. Drum trucks and Hand trucks
16. Air compressors
17. Boilers
18. Heaters
19. Sprinklers
20. Banders
21. Stretch Wrap
22. Others as appropriate to location

IV. Forklifts

A. Certification

1. Written Exam - administered and reviewed
2. Skill Demonstration Exam - administered and reviewed.

NOTE: Upon satisfactory completion and review of the above items, the trainee is to be issued an operators card.

B. Review of branch forklift(s) load capacities.

C. Care and Maintenance

1. Daily inspection sheets - review of how to prepare and demonstration of conducting a proper inspection.
2. Review of proper start-up and shut-down procedures. Fuel shut-off, removal of keys, forks at floor, etc.
3. Fuel storage and control requirements. Demonstration of the proper means of changing tanks.
4. Preventative Maintenance - frequency, responsibility.

V. Paperwork

(Continued)

A. Forms - review the various forms which the trainee may be exposed to in his/her daily job functions. Discuss the appropriate use, review, preparation of forms. The forms reviewed may include but not be limited to:

1. Bill of Lading
 - a) DSW, Inc. prepared
 - b) Outside carrier, supplier
2. Purchase Orders
3. Receiving Tickets
4. Pick up notices
5. Hazardous Waste manifests
6. Empty Container Receipts
7. C.O.D. procedures
8. Material Scrap Reports
9. Fuel tickets
10. Empty Container Scrap Reports
11. Job Tickets and Supplemental Job Tally cards.
12. Product meter tickets
13. Scale Tickets
14. Others as appropriate

Note: It is unlikely that the trainee will be totally familiar with the preparation and routing of the forms immediately after training. Continued follow-up and review is required to allow the trainee to become self-sufficient.

(Continued)

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SEPT. 22, 1986

- B. Discuss the necessity for review of paperwork to assure that errors are not allowed to go unnoticed. The importance of continual double-checks should be stressed.

VI. Material Handling - Warehouse and Loading

- A. General review of types of packages handled at facility (bags, drums, cylinders, portable tanks, etc.)
- B. Review of hazardous materials - identification by DOT labels on packages, types of hazards, designated inside and outside storage areas for particular hazard groups, etc. (Ch. Op. Ref. 10.70 and 30.55, Exhibit I).
- C. Review of DOT loading restrictions on trailers (Ref.- Wall Loading Charts. See also Section VII, "Compatibility...")
- D. Placarding requirements of trucks hauling hazardous materials. Requirement for shippers to offer carriers appropriate placards.
- E. First-In/First-Out inventory usage and maintenance.
- F. Proper action to be implemented in the event of package damage. Immediate use of:
 - 1. Tape
 - 2. Overbags
 - 3. Salvage drums
 - 4. Container transfer by appropriate personnel if branched approved.
- G. Disposition of damaged materials (dumpster off limits unless authorized)
- H. Requirement to notify the supervisor when a shipment is received having damage contained. (Freight Claims). (Ch. Op. Ref. 40.10).
- I. Segregation and compatibility of freight claim and damaged materials (Also see Section VII, "Compatibility ...")
- J. Detention and demurrage
- K. Cleaning of trailers and railcars.
- L. Weight distribution on trucks/trailers.

(Continued)

- M. Required loading and bracing techniques on trucks/trailers.
- N. Palletizing techniques--review of crosstie techniques for bags. Some basic parameters to be reviewed but not necessarily limited to include:

Bags

- 1. Crosstie 24 x 100# bags on 48" x 48" pallets.
- 2. Crosstie 21 x 100# bags on 42" x 48" pallets.
- 3. Short 100# bags can be palletized six across and five high (30 bags).
- 4. 50# bags -- 40 per pallet.

Drums

- 1. Drum size to dictate number contained on pallet - no overhang should be present.
- 2. 15 gallon deldrums and S.S. drums when palletized should have one strap of banding around belly when shipping (not necessary for storage).

Note: Height of palletized bags and drums will dictate stacking height in the warehouse and yard. Typically it is acceptable to stack three high but the weight of the material contained in the package and the package itself may dictate stacking only two high (i.e. Plasti-drums, sludge drums, powdery bagged materials). Bags must be palletized flat and neatly for safety so that the stacks are free standing. The adherence to a standardized palletizing and stacking procedure will aid in perpetual inventory control as well as shipping and receiving flow.

Cylinders

- 1. Standard number of 150# empty or full chlorine cylinders per pallet is 16 and requires 3 bands. Partial pallets of cylinders in storage are required to be secured in an upright position. Cylinders are to be palletized on special cylinder pallets only.
- 2. Ammonia cylinders require 3 bands and should be loaded with 12 cylinders per pallet.

(Continued)

3. Ton containers must be properly braced/chocked when in transit. In storage they should be placed on 4 x 4's (or similar method to raise them off ground) and chocked to prevent rolling.

O. Hazardous Waste - discussion of designated storage area and secondary containment system.

P. Review of proper lifting techniques.

VII. Compatibility and Storage Techniques (Ch. Op. Ref. 40.01)

A. Review of designated warehouse/yard storage areas for materials of given hazardous nature.

B. Maintaining of clear, clean, and marked aisleways.

C. Company Compatibility Program and branch binder -- review of binder location and its use.

D. Storage of drummed Flammable Liquids in quantities per OSHA standards (40 drum limit - 2200 gallons per group).

E. USP/Food Grade dedicated pallet program (Ch. Op. Ref. 40.61).

F. Hazardous Waste designated storage area and the compatibility requirements of materials stored within area.

G. Available reference materials.

1. MSDS's

2. Dow Stewardship (Ch. Op. Ref. 10.65).

3. Suppliers

4. Company Staff Personnel

VIII. Hazardous Waste Handling Procedures (As required under 40 CFR, Section 265.16) Required areas of training are the following:

A. DSW, Inc. general safety - covered under Section II, "Safety".

B. Hazardous Waste Manifest Procedures - to include: (Ref. "Manifesting Procedures") Contained in RCRA - Administrative Procedures.

1. Review of incoming shipments

a) Count verification

b) Proper labels

(Continued)

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SEPT. 22, 1986

- c) Proper containers
- d) Proper data filled in on manifest forms.
- 2. Preparation of reshipments
 - a) Count verification
 - b) McKesson "add-on" labels to indicate manifest number, lot number, etc.

- C. Emergency/Contingency Plan - covered under Section II, "Safety".
- D. Container Receiving and Maintenance Procedures.
- E. Weekly Container Inspection - review of inspection form and logging requirements.
- F. Container Transfer Procedures in event of a "leaker" - review documentation requirements.
- G. Emergency Response procedures to be reviewed as it pertains to Hazardous Waste incidents.
- H. Evacuation Plan - covered under Section II, "Safety".
- I. Forklift Certification - covered under Section IV, "Forklifts".
- J. Compatibility - covered under Section VII, "Compatibility..."
- K. Emergency Equipment - covered under Section II, "Safety".
- L. Review the need for management to make the determination as to whether a virgin material which may have to be scrapped must be handled as a hazardous waste, and the proper means of accomplishing such.

NOTE: It is required that the individual be given an annual review of their training as it applies to H/W procedures - and be documented.

- IX. Housekeeping, Sanitation, and General Facility Maintenance (Ch. Op. Ref. 10.72 and 40.60)
 - A. Accountability of the employee for assigned work area. Responsibility for tools, equipment, cleanliness, safety, etc.
 - B. Clean up of work areas. Stress the importance of immediate clean up.

(Continued)

- C. Importance of nonobstruction of aisleways, stairs, ramps, and walkways.
- D. Dumpster location, nightly waste receptacle emptying.
- E. Good Manufacturing Practices (Ref. 40.62).
- F. Snow conditions. Necessity for shoveling and salting/sanding of work and pedestrian travel areas.
- G. Replacement of light bulbs means of access in warehouse area.
- H. Rodents, birds, and insects. Means of control and reason for 4" spacing from walls with goods.

Additional Specific Locational Training Requirements.

HAZARDOUS WASTE MANAGEMENT
TRAINING SESSION
Spartanburg, South Carolina
March 5, 1985

DISTRIBUTION:

CC: J.H. FOSTER
D.A. DAVIS

ATTENDEES:

Jed Schoolcraft - Atlanta
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Dennis Thornton - Spartanburg
Ed Kerul - Tampa
H.E. Brown - Atlanta Area
W.R. Landry - New Orleans Area

To See Distribution

Date March 15, 1985

From D.M. Black

Location/Tel. North Haven

McKesson

**Intra Company
Correspondence**

Subject **HAZARDOUS WASTE MANAGEMENT** Copies To
 TRAINING SESSION

This meeting was a classroom session devoted to updating hazardous waste management practices on the part of the operations managers at the McKesson service centers located in the Atlanta and New Orleans Areas. Particular emphasis was placed on the responsibilities relative to the holding of interim status - specifically the requirement that the following be immediately available for inspection:

Contingency Plan
Waste Analysis Plan
Training Program
Inspection Schedule
Closure Plan and most recent Cost Estimate

The contents of these documents were reviewed and their implications described.

The requirements of the written Operating Record were reviewed:

1. A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its storage.
2. The location of each hazardous waste within the facility and the quantity at each location. This information must include cross-references to specific manifest document numbers.
3. Records and results of waste analyses performed.
4. Summary reports and details of all incidents that require implementation of the Contingency Plan.
5. Records and results of inspections.
6. Copies of the notices to generators that the McKesson facility has the appropriate permit(s) for, and will accept, the waste the generator is shipping.
7. The most recent closure cost estimate.

All of the above records are to be kept until the facility is closed, except that records and results of inspections (No. 5) need to be kept only 3 years.

The waste analysis verification procedure now in effect at the Little Rock , Fayetteville, Atlanta, Augusta, Chattanooga, Kingsport, Spartanburg, Charlotte and Greensboro branches was reviewed in detail.

The status of the various service centers in their respective permitting process was reviewed and questions relevant to each situation answered.

Jms

To

D.M. Black

Date

June 24, 1985

From

Hal Brown

Location/Tel.

ATLARLO/1816

Subject

HAZARDOUS WASTE TRAINING--
TAMPA MANAGEMENT

Copies To

Fred B. Hayes
Julian Foster
Gene Rainwater
Ed Kerul

M-Kesson
Intra Company
Correspondence

On Friday, June 21, 1985, Management Training for key personnel at the Tampa Service Center in Hazardous Waste Management was conducted by Hal Brown.

The following persons attended:

Ed Collins-Warehouse/Bulk Liquids Manager
Ed Kerul-Operations Manager
Gene Rainwater-Service Center Manager
Steve Rudnick-Administrative Manager

The training program consisted of the ten items covered on Attachment I (Training Program Outline). In addition to these items, special emphasis was given to the following specific topics:

Scheduling, coordinating, and inter-branch communicating to ensure rigid compliance with transporter standards; i.e., 10 day time limit on staging loads.

All hazardous waste survey forms were checked by Hal Brown for accuracy and completeness and appropriate corrections were posted to their DOT shipping descriptions and EPA waste numbers.

Operating records in total, and specifically, the operating log, were reviewed and positive steps were adopted to insure compliance with standards.

HECB/lah
Attachment

DSW, Inc.

Training Program Outline

A. Branch Management

1. General Facility Considerations - Generators, Transporters, Permits, ID Numbers, Administrative Procedures.
2. Waste Analysis Responsibilities and Procedures.
3. Preparedness - Equipment, Communications, Emergency Prevention.
4. The Contingency Plan - Responsibilities, Current Status, Procedures, the Emergency Coordinator.
5. Recordkeeping, the Operating Record, Inventory Control.
6. Inspections- Inspection Log.
7. Security.
8. The Closure Plan, Financial Responsibilities.
9. Training, Responsibilities, Records, Role of Branch, Role of Region.
10. Handling Hazardous Waste, Containers, Storage, Inspections, Inventory, Ignitables.

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SEPT. 22, 1986

DSW, Inc.
Closure Cost Estimate
Tampa, Florida Branch

| | | |
|--|-----------------|---------------|
| <u>I. Basic Disposal Charge</u> | | |
| 90 drums at \$65.00 | | \$5,850.00 |
| <u>II. Warehouse Labor (Loading)</u> | | |
| At hourly rate including fringe benefits - 3 hours required. | | \$35.00 |
| <u>III. Transportation</u> | | |
| To McKesson EnviroSystems, New Castle, Kentucky 852 miles at \$1.25/mile — two loads. | | \$2,130.00 |
| <u>IV. Equipment Cost</u> | | |
| Forklift at \$5.00/hour - 3 hours required. | | \$15.00 |
| <u>V. Decontamination Cost</u> | | |
| Secondary Containment Area Cleaning 2 hours at \$30.00/hour | \$60.00 | |
| Disposal of Cleanup residue 2 drums at \$65.00 | \$130.00 | |
| Disposal of Pallets | \$100.00 | |
| Laboratory Services | <u>\$100.00</u> | |
| | | \$390.00 |
| VI. Contingencies at 20% of Subtotal of \$8420.00 | | \$1,684.00 |
| VII. Engineer Certification | | \$300.00 |
| <u>Total Cost of Closure</u> | | \$10,404.00 * |

*Revised closure cost as of June 27, 1986: \$11,153

REVISED
SEPT. 22, 1986

DSW, Inc.
1600 NORTON BUILDING
SEATTLE, WASHINGTON 98104
TELEPHONE (206) 447-5909

THE FINANCIAL ASSURANCE MECHANISM FOR CLOSURE AND LIABILITY
REQUIREMENTS WILL BE SUBMITTED SEPARATELY.

Container Management

DSW, Inc.

Hazardous waste materials stored at this facility will be received from outside generators. This facility is used as an accumulation and transfer point of drummed materials received from generators in small lots, and reshipped in economic truckloads to an off-site recycling location. The containers utilized by customers to ship spent material to the DSW, Inc. facility are invariably of 55-gallon capacity or less. Containers typically utilized are constructed of steel, meeting DOT specification 17E for the most part; some 17H and 5B drums may occasionally be encountered. The customer is required to provide the spent material in a container authorized for the commodity as set forth by the Department of Transportation in 49 CFR 172.101.

Reuse of containers for waste materials by customers is allowed as authorized by the Department of Transportation, 49 CFR 173.28 ("Reuse of Packaging (containers)"). DSW, Inc. does request of its customers that if they are reusing containers, they place spent material back into a container which held the same material originally. This practice is encouraged to ensure that there is no risk of incompatible materials being introduced into the container which might result in container failure, or cause cross-contamination which may result in problems relating to the reclamation of the material.

Thus, container management begins by DSW, Inc. / employees even prior to receipt of drummed materials at the facility. Waste materials which have been approved internally for handling may be accepted by a Company driver only if they have received a pick-up notice from the DSW, Inc. branch. The branch office, even prior to issuing such notice, has requested the customer (generator) to provide a photocopy of its manifest containing the pertinent information. This information would include all items pertaining to generator, transporter, destination, material description, ID numbers, etc. Some items, such as number of drums, dates, signatures, and weights are allowed to be left uncompleted until the actual day of pick-up of the material. A copy of the customer's original manifest is provided to the driver along with pick-up notice.

This mode of operation is followed for a number of reasons. First, it allows DSW, Inc. personnel an opportunity to review the generator's manifest for compliance and proper information. Secondly, it allows DSW, Inc. office personnel a chance to verify that an analysis of a sample of the proffered stream and supporting data are on file at the branch to comply with such requirements, and to verify that internal approvals have been given to accept a given waste item. Lastly, it gives DSW, Inc. drivers making pick-ups of such materials more accurate

information to look for.

Once a pick-up of material has been scheduled into a particular driver's routing, further assurances and checks are undertaken by the driver upon arrival at the generator's plant. Upon arrival, the driver must be presented with the original manifest by the generator's shipping personnel. The DSW, Inc. driver compares his photocopy of the generator's manifest, included with the pick-up notice, with that of the original. All items on the original must be complete with no modifications when compared with the photocopy sent to the DSW, Inc. office, other than quantity listing, dates, signatures, weights, etc. Any alterations such as an addition of different materials, or questionable variations, will cause the driver to refuse acceptance of the material, unless such modifications are approved by phone conversation with DSW, Inc. management at the branch.

Once the manifest(s) are checked and approved by the driver, the containers are checked for compliance before being loaded onto Company vehicles. DSW, Inc. encourages generators to utilize Labelmasters, Hazardous Waste Label, style WM-6, which complies with all requirements of 40 CFR 262.32. Other labels are allowed to be utilized by the generator as long as they contain all appropriate information. All Department of Transportation regulations pertaining to labeling and marking contained in 49 CFR 172 must also be followed.

REVISED
SEPT. 22, 1986

The appended checklist entitled "Hazardous Waste Pick-up Checklist" has been developed for use in training of drivers for picking up of waste materials from customers. This form is used primarily for training purposes, but in some instances is utilized by new and inexperienced drivers until a comfort level of knowing what items must be reviewed in accepting a waste shipment is attained.

Upon the return of the DSW, Inc. truck that picked up the waste material from the generator, DSW, Inc. warehouse personnel unload the material at the unloading area noted on the facility site plan, utilizing one of the forklift assigned to this location, having a lifting capacity of at least 4000 lbs. The appended "Container Receiving and Maintenance Procedure" follows this unloading operation, and, then, the waste analysis verification procedure described previously is implemented.

(In addition to the warehouse personnel procedures, the activities outlined in "RCRA Compliance - Administrative" are undertaken. This procedure bulletin, specifically Section VI through and including Section VIII, describes the internal paper flow and controls exercised to provide the necessary information and data necessary to properly manage and account for all waste material received and inventoried at this branch.)

Once these procedures are completed, the drums are carried by conventional forklift handling to the secondary containment area, described

later.

Containers holding waste are maintained in a closed condition while being stored at this facility. Because this facility functions as only an accumulation and transfer point, no opening of containers is required (other than as required for Waste Analysis Verification) unless a leaking container was found and transfer to another drum was required. Procedures are in place for such occurrences and are undertaken under management supervision with such incidents being noted and documented in the appropriate logs.

Waste containers while in storage at a DSW, Inc. branch are subject to a weekly inspection for specific defects as outlined under "inspections". Results of the inspection are recorded in the facility "Inspection Log".

While in the storage area, the drums will remain on the wooden pallets. Full pallets of drums will be normally stacked only two high, and those containing ignitables will be stored according to 29 CFR Sec. 1910.106(d)(5), a copy of which follows. Once a quantity of drums has been accumulated to form an economic truckload for reshipment to the recycling plant, the drums shall be brought back to the loading dock area from the hazardous waste storage location just prior to shipment. This again will be accomplished by forklift. Once in the loading dock area, the drums will be prepared for shipment and

DSW, Inc.

Container Management
Page 6.

loaded onto the truck.

Full compliance for receipt and reshipment of materials as it applies to manifesting and administrative procedures will be undertaken. All applicable DOT regulations pertaining to highway transit of hazardous materials and hazardous wastes will be complied with.

All containers stored at this facility will be held in the designated secondary containment area, detailed in the following section.

REVISED
SEPT. 22, 1986

TABLE H-14—INDOOR CONTAINER STORAGE

| Class liquid | Storage level | Gallons | |
|--------------|-------------------------|------------------------------------|--------------------------------------|
| | | Protected storage maximum per pile | Unprotected storage maximum per pile |
| A | Ground and upper floors | 2,750 (50) | 600 (12) |
| | Basement | Not permitted | Not permitted |
| B | Ground and upper floors | 5,500 (100) | 1,375 (25) |
| | Basement | Not permitted | Not permitted |
| C | Ground and upper floors | 16,500 (300) | 4,125 (75) |
| | Basement | Not permitted | Not permitted |
| II | Ground and upper floors | 16,500 (300) | 4,125 (75) |
| | Basement | 5,500 (100) | Not permitted |
| III | Ground and upper floors | 55,000 (1,000) | 13,750 (250) |
| | Basement | 8,250 (450) | Not permitted |

NOTE 1: When 2 or more classes of materials are stored in a single pile, the maximum gallonage permitted in that pile shall be the smallest of the 2 or more separate maximum gallonages.

NOTE 2: Aisles shall be provided so that no container is more than 12 ft. from an aisle. Main aisles shall be at least 3 ft. wide and side aisles at least 4 ft. wide.

NOTE 3: Each pile shall be separated from each other by at least 4 ft.
(Numbers in parentheses indicate corresponding number of 55-gal. drums.)

TABLE H-15—INDOOR PORTABLE TANK STORAGE

| Class liquid | Storage level | Gallons | |
|--------------|-------------------------|------------------------------------|--------------------------------------|
| | | Protected storage maximum per pile | Unprotected storage maximum per pile |
| IA | Ground and upper floors | Not permitted | Not permitted |
| | Basement | Not permitted | Not permitted |
| IB | Ground and upper floors | 20,000 | 2,000 |
| | Basement | Not permitted | Not permitted |
| IC | Ground and upper floors | 40,000 | 5,500 |
| | Basement | Not permitted | Not permitted |
| II | Ground and upper floors | 40,000 | 5,500 |
| | Basement | 20,000 | Not permitted |
| III | Ground and upper floors | 60,000 | 22,000 |
| | Basement | 20,000 | Not permitted |

NOTE 1: When 1 or more classes of materials are stored in a single pile, the maximum gallonage permitted in that pile shall be the smallest of the 2 or more separate maximum gallonages.

NOTE 2: Aisles shall be provided so that no portable tank is more than 12 ft. from an aisle. Main aisles shall be at least 8 ft. wide and side aisles at least 4 ft. wide.

NOTE 3: Each pile shall be separated from each other by at least 4 ft.

(vi) **Flammable and combustible liquid warehouses or storage buildings.**

(a) If the storage building is located 50 feet or less from a building or line of adjoining property that may be built upon, the exposing wall shall be a blank wall having a fire-resistance rating of at least 2 hours.

(b) The total quantity of liquids within a building shall not be restricted, but the arrangement of storage shall comply with Table H-14 or H-15.

(c) Containers in piles shall be separated by pallets or dunnage where necessary to provide stability and to prevent excessive stress on container walls.

(d) Portable tanks stored over one tier high shall be designed to nest securely, without dunnage, and adequate materials handling equipment shall be available to handle tanks safely at the upper tier level.

(e) No pile shall be closer than 3 feet to the nearest beam, chord, girder, or other obstruction, and shall be 3 feet below sprinkler deflectors or discharge orifices of water spray, or other overhead fire protection systems.

(f) Aisles of at least 3 feet wide shall be provided where necessary for rea-

sons of access to doors, windows or standpipe connections.

(6) **Storage outside buildings—(i) General.** Storage outside buildings shall be in accordance with Table H-16 or H-17, and subdivisions (ii) and (iv) of this subparagraph.

TABLE H-16—OUTDOOR CONTAINER STORAGE

| 1—Class | 2—Maximum per pile | 3—Distance between piles | 4—Distance to property line that can be built upon | 5—Distance to street, alley, public way |
|---------|--------------------|--------------------------|--|---|
| | gallons | feet | feet | feet |
| IA | 1,100 | 5 | 20 | 10 |
| IB | 2,200 | 5 | 20 | 10 |
| IC | 4,400 | 5 | 20 | 10 |
| II | 8,800 | 5 | 10 | 5 |
| III | 22,000 | 5 | 10 | 5 |

NOTE 1: When 2 or more classes of materials are stored in a single pile, the maximum gallonage in that pile shall be the smallest of the 2 or more separate gallonages.

NOTE 2: Within 200 ft. of each container, there shall be a 12-ft. wide access way to permit approach of fire control apparatus.

NOTE 3: The distances listed apply to properties that have protection for exposures as defined. If there are exposures, and such protection for exposures does not exist, the distances in column 4 shall be doubled.

NOTE 4: When total quantity stored does not exceed 50 percent of maximum per pile, the distances in columns 4 and 5 may be reduced 50 percent, but not less than 3 ft.

(ii) **Maximum storage.** A maximum of 1,100 gallons of flammable or combustible liquids may be located adjacent to buildings located on the same premises and under the same management provided the provisions of subdivisions (a) and (b) of this subdivision are complied with.

(a) [Reserved]

(b) Where quantity stored exceeds 1,100 gallons, or provisions of subdivision (a) of this subdivision cannot be met, a minimum distance of 10 feet between buildings and nearest container of flammable or combustible liquid shall be maintained.

(iii) **Spill containment.** The storage area shall be graded in a manner to divert possible spills away from buildings or other exposures or shall be sur-

rounded by a curb at least 6 inches high. When curbs are used, provisions shall be made for draining of accumulations of ground or rain water or spills of flammable or combustible liquids. Drains shall terminate at a safe location and shall be accessible to operation under fire conditions.

(iv) **Security.** The storage area shall be protected against tampering or trespassers where necessary and shall be kept free of weeds, debris and other combustible material not necessary to the storage.

(7) **Fire control—(i) Extinguishers.** Suitable fire control devices, such as small hose or portable fire extinguishers, shall be available at locations where flammable or combustible liquids are stored.

TABLE H-17—OUTDOOR PORTABLE TANK STORAGE

| 1—Class | 2—Maximum per pile | 3—Distance between piles | 4—Distance to property line that can be built upon | 5—Distance to street, alley, public way |
|---------|--------------------|--------------------------|--|---|
| | gallon | feet | feet | feet |
| IA | 2,200 | 5 | 20 | 10 |

CONTAINER RECEIVING AND MAINTENANCE PROCEDURE

When a shipment of hazardous waste is being received by our branch, the following procedure will be followed:

Receiving tickets must be issued upon receipt. In addition to the normal information required on the receiving ticket, be sure to indicate:

1. "Hazardous Waste Material".
2. The hazardous waste manifest number.

The receiving clerk will be presented with a minimum of three copies of the Hazardous Waste Manifest. The receiving clerk will:

1. Verify that all required information is included on the manifest.
2. Verify that all items are received and initial each item on the manifest.
3. Enter the date received and the receiving ticket number in the identification Section for the TSDF.
4. If all items are in order, sign the manifest in the space provided for the TSDF.
5. Any discrepancies should be brought to the transporter and Operations Manager's attention. If the discrepancy cannot be resolved, the load is to be refused.
6. Return a signed copy to the transporter (other than DSW, Inc.).
7. Attach white and yellow copies of the receiving ticket to the TSDF copy.
8. Turn in all manifest copies and attached receiving ticket to the office at the end of each work day.

REVISED
SEPT. 22, 1986

CONTAINER RECEIVING AND MAINTENANCE PROCEDURE
Page 2.

Immediately stencil the receiving ticket number on each drum.

Physically check all bungs and openings to insure tightness.

Inspect each drum for leaks, bulges, extreme corrosion;

NOTE: If any deficiencies are found, effect container transfer procedure.

Remove to storage location in accordance with DSW, Inc.

Compatibility Storage program.

All containers are now subject to weekly inspections.

REVISED
SEPT. 22, 1986

DSW, Inc.

Secondary Containment System Design and Operation

All 55-gallon steel containers which will be utilized to store off-site generator's waste materials at the DSW, Inc.

storage facility will be held pending reshipment in a designated secondary containment area.

The secondary containment area to be utilized at this DSW, Inc. branch will be located along the approximate center of the west wall of the major warehouse room. It will be a rectangle 19 feet by 25 feet, the long side of which is parallel to the wall, and will be separated from the rest of the warehouse by a 3.5-inch berm on three sides, with the warehouse wall serving as the fourth side. The 475 square feet so enclosed will provide space for two rows of 6 pallets each along the wall, plus a ten foot aisle for forklift maneuvering. With double stacking of pallets, each holding four drums, storage for 88 drums is easily provided. The floor of the area is free from cracks, holes, and gaps, and the berm is integrally bound to the concrete floor to prevent leakage or seepage.

The volume of containment area provided by this design provides for an accidental spillage or leakage equal to 10% of the maximum gallonage stored. For 96 55-gallon drums, the maximum volume of

10/17/85
REVISED
SEPT. 22, 1986

spent solvents is 5280 gallons. Ten per cent of this figure is 528 gallons, while the proposed storage volume provides 873 gallons:

$$19 \text{ feet} \times 25 \text{ feet} \times 3.5 \text{ inches} = 138.5 \text{ cubic feet}$$

$$1 \text{ cubic foot} = 7.48 \text{ gallons}$$

$$138.5 \text{ cubic feet} \times 7.48 \text{ gallons/cu. ft.} = 1036 \text{ gallons.}$$

However, in addition to the provision for spillage or leakage, the pallets on the floor will occupy volume:

| <u>Component</u> | <u>Dimensions (in.)</u> | <u>Quantity</u> | <u>Cubic Inches</u> | <u>Cubic Feet</u> |
|-----------------------------|-------------------------|-----------------|---------------------|-------------------|
| Deckboards | 48 x 6 x 1 | 8 | 2304 | 1.33 |
| Stringers | 48 x 1 7/8 x 3 5/8 | 3 | 847 | <u>.49</u> |
| Total Cubic Feet per Pallet | | | | 1.82 |

$$1.82 \times 7.48 \text{ gal./cu.ft.} \times 12 \text{ pallets} = 163 \text{ gallons.}$$

The 1036 gallons above would be reduced by the 163 gallons needed for the pallets thus providing (1036 - 163) 873 gallons net storage.

Should any spill or leakage be apparent in this area, it will be absorbed onto an inert substance and the contaminated material then be collected in an open-head drum and disposed of at a suitable permitted facility.

Since all containers while in storage would remain on a wooden pallet, there would be not contact between the drums and any spilled or leaked material.

Since the storage area would be indoors, there is no problem of stormwater run-on or run-off.

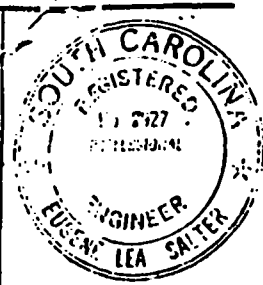
An engineering drawing of the proposed secondary containment area prepared by a Florida-licensed engineer follows.

REVISED
SEPT. 22, 1986

The base of the containment area where the waste is stored -- the warehouse floor -- is concrete, free of cracks and breaks.

Concrete is acknowledged to be resistant to all neutral organic solvents, both halogenated and non-halogenated. This has been verified in recent discussions with DSW, Inc.'s largest vendor of such products. As a matter of fact, DSW, Inc.* over the past few years has steadily replaced asphalt paving with concrete in its regular yard storage areas (and has installed concrete in all new yard areas) because of concrete's resistance to organic solvents compared to that of bituminous materials. An unlikely problem can be envisioned in the sense that an aged halogenated solvent containing water (in the absence of the inhibitors normally added to such solvents) could generate hydrochloric acid which can attack concrete, but any significant or perhaps even observable deterioration would require a substantial time period (months). This situation would not be expected to arise at a waste storage area such as is being considered in these pages because of the short time (days) any container of spent solvent would be expected to remain at the branch and the constant inspection of the integrity of the secondary containment area. Moreover, a sufficient acidity to be considered corrosive (less than pH of 2 as defined in 40 CFR 261.22) would be caught at the time of the submission of the generator's analytical data and DSW, Inc. Spent Material/Waste Product Survey Form which calls for the pH of the proffered material.

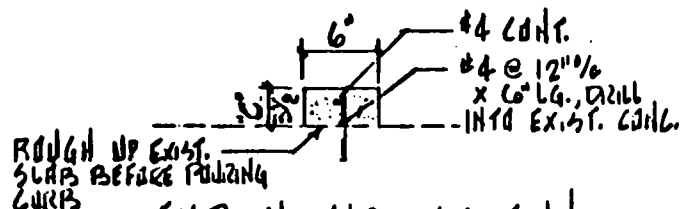
* DSW Inc's predecessor, McKesson Chemical Company.



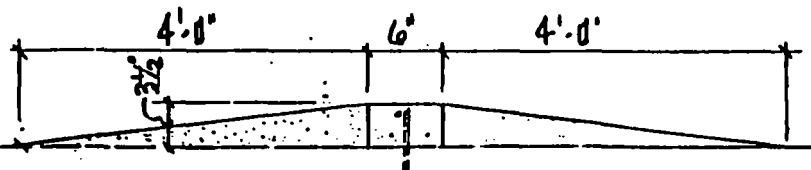
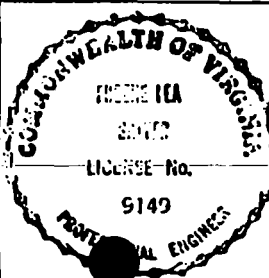
| STANDARD SIZES | | | |
|----------------|---------|---------|----------|
| PALLETS | A' DIM. | B' DIM. | CURB HT. |
| 18 | 21' | 19' | 3 1/2' |
| 24 | 25' | 19' | 3 1/2' |
| 26 | 27' | 19' | 3 1/2' |
| 28 | 33' | 19' | 3 1/2' |
| 32 | 37' | 19' | 3 1/2' |



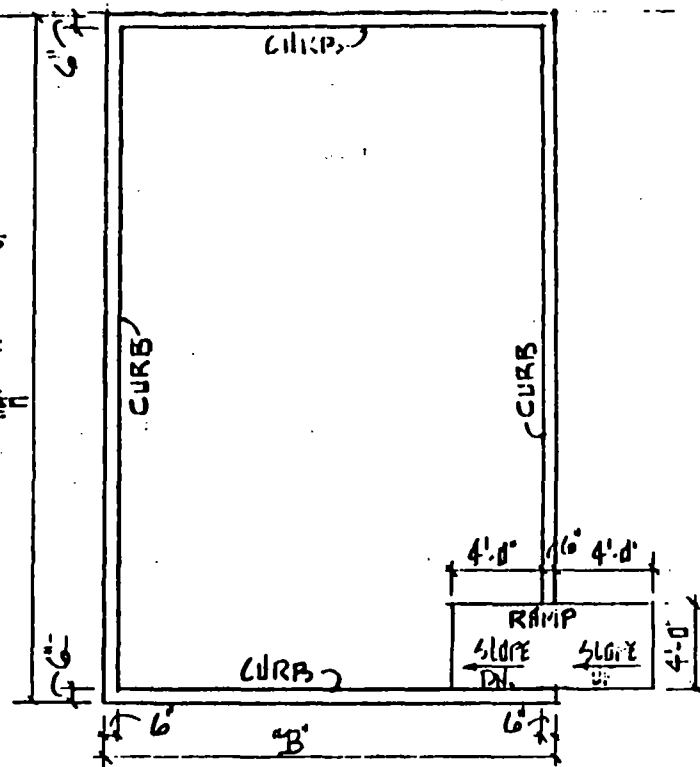
- △ Seal joints with silicone at walls, expansion joints
- △ Alternate 2 - Pour 12"x3 1/2" rounded front curb in lieu of side ramp



TYPICAL CURB SECTION



SECTION THRU RAMP



STORAGE PLAN

NO SCALE
6/1/84

△ Notes 1,2 added - 6/1/84

ENCLOSED STORAGE AREA FOR HAZARDOUS WASTE DRUMS
DSW, Inc. WAREHOUSE

DSW, Inc.

Prevention of Ignition

A DSW, Inc. storage facility handles materials in waste form from off-site generators who wish to employ the Company's recycling capabilities. This site functions as a temporary storage and transfer point for accumulating economic truckloads to make it economically feasible to reship these materials the distance involved in getting to the recycling centers.

Some of the materials handles in waste form at this facility are expected to fall into the category of an ignitable. This facility will not handle any materials which would be classified as a reactive or incompatible waste. All waste materials are stored in the designated waste storage area indicated on the facility diagram.

All containers (drums) utilized for shipments of waste materials are of proper specifications as outlined in the section entitled "Containers Management" to contain, store, and transport the materials handled. All containers of waste material are tightly closed while in storage. It is DSW, Inc. policy that no smoking is allowed in any areas of the facility other than office and breakroom areas. "No Smoking" and "Danger-Unauthorized Personnel Keep Out" signs are prominently posted. Personnel are instructed and familiar with the required precautions which must be exercised when working around ignitable materials such as the use

REVISED
SEPT. 22, 1986

of spark proof tools, elimination of possible ignition sources, etc.

In the event that a leaking container is discovered and requires transfer while in storage at this site, only new, unused containers of the proper specification for the material will be utilized.

Containers of ignitable wastes while present at this facility are handled with the respect they deserve in order to minimize the possibility for fire or explosion. All containers are kept tightly sealed and are in good condition (including proper labelling and marking) prior to the driver's accepting them at the generator's facility in the first place. Drums are placed on wooden pallets and remain on these pallets while in storage. Pallets of waste materials while in storage in the designated hazardous waste storage area are typically stacked two high. Stacks will be maintained in a neat manner with no overhang or leaning. Only good quality wooden pallets are used. The designated hazardous waste storage area is more than 50 feet from the facility property lines as required.

Wastes handled by this branch for recycling are compatible with each other in that when combined they do not cause a reaction. All wastes are separated by a curb from all other chemicals and solvents in the general area; incompatibilities are, therefore, not a factor.

DSW, Inc.

Inspection Schedules

As a result of DSW, Inc. ; being only a distributor of chemicals (no manufacturing, no processing), any of its facilities will employ only a limited variety of equipment in its daily business. Because of the type of activity undertaken, the inspection activity required is low in comparison to that required in a processing or manufacturing environment. However, a number of regular and routine inspections are carried out on that equipment involved in the day's business. Also, routine inspections are conducted on safety equipment which might be required in emergency situations to ensure that these items will be accessible and ready if a situation occurs. Inspections center upon evaluation of equipment for possible malfunctions, structural deterioration, operator errors, and unintentional discharges which could affect the environment or threaten human health.

The appended Table lists the items which are routinely inspected and the types of problems which could be present or cause an item to be non-functional as well as the frequency with which the items are inspected. In addition to these inspections, which are routinely carried out by branch personnel,

DSW, Inc. has other Company personnel not stationed at the facility conduct a "Safety Audit" of the operation on a quarterly basis. This policy has been in place since 1978 and entails either the branch's District Manager or

a member of the Regional Operations Department Staff's visiting the branch for what typically is a full day to inspect and evaluate the facility in approximately 180 areas pertaining to safety and operating procedures. Examples of areas checked are:

- | | |
|--|---|
| 1. Office area | 8. Warehouse & dock areas |
| 2. Drivers' records | 9. Yard area |
| 3. Fire protection | 10. Transportation |
| 4. Maintenance | 11. Physical layout & equipment |
| 5. Compliance with OSHA, RCRA, DOT, and other rules and regulations. | 12. General recordkeeping and control |
| 6. Security | 13. Compatibilities of stored materials |
| 7. Safety practices | 14. Waste management procedures |

Inspections of the hazardous waste container storage area will be conducted as outlined in Table 1. Results and documentation of any remedial actions which might be required will be recorded on an inspection log sheet which will include the item inspected, date, and time of inspection, name of inspector, observations, remedial action (if necessary), date repair completed (if required), and supervisor's signature. These logs are kept for three years at the branch.

If DSW, Inc. personnel during a routine inspection find that a condition of a non-emergency nature is present which requires some type of maintenance in order to bring that particular

article into compliance with standards, it shall be that employee's responsibility either to bring the item into compliance or to bring it to the facility management's attention for correction of the deficiency. All remedial actions are undertaken at the earliest possible time in order to eliminate potential for further deterioration of equipment, and to resolve an unsafe condition.

If during an inspection a situation would be found which is of an emergency nature, or has the potential to become one, the employee shall immediately initiate remedial action, and will notify the Emergency Coordinator who shall carry out his/her actions as outlined in the Contingency Plan. As outlined in the Contingency Plan, in the event of a release of a hazardous material it shall be the objective to contain, isolate, clean-up, and decontaminate the affected area with the utmost concern for minimizing risk to Company workers, the public, and the environment. The clean-up material must then be properly disposed of and necessary documentation and reporting undertaken.

Table 1

DSW, Inc.

**Inspection Schedule
(To be kept at Branch)**

| <u>Area/Equipment</u> | <u>Specific Items</u> | <u>Types of Problems</u> | <u>Frequency of Inspection</u> |
|---|----------------------------------|---|--|
| <u>Container Storage Area (Secondary Containment)</u> | General Area | Leaks, spills | Daily |
| | Container placement and stacking | Aisle space, stacking height, unstable stacks | Weekly |
| | Container integrity | Leaks, corrosion, bulging | Weekly |
| | Sealing of containers | Improper identification Date missing Illegibility | Weekly |
| | Base | Cracks, erosion | Daily |
| | Curb | Cracks, deterioration | Daily |
| | Warning signs | Damaged | Weekly |
| | Debris & refuse | Aesthetics | Weekly |
| | Accumulated liquid | Contamination | Daily, and confirm after precipitation if required |
| | Pallets | Broken boards, stringers | Weekly |
| <u>Security Devices</u> | Facility fence | Corrosion, damage | Weekly |
| | Main gate | Corrosion, damage, non-locking | Weekly |
| | Rail gate | Corrosion, damage, non-locking | Weekly |
| | Pedestrian gate | Corrosion, damage, non-locking | Weekly |

REVISED
SEPT. 22, 1986

Inspection Schedule
DSW, Inc.
Page 2.

| <u>Area/Equipment</u> | <u>Specific Items</u> | <u>Types of Problems</u> | <u>Frequency of Inspection</u> |
|---|---|----------------------------------|--------------------------------|
| <u>Loading, Unloading Areas</u> | Surface areas | Deterioration, spills | Daily |
| | Dock bumpers | Damage | Daily |
| <u>Safety & Emergency Equipment</u> | Emergency shower & eye wash | Water pressure, leaks, drainage | Weekly |
| | Industrial absorbent | Less than 5 bags | Monthly/ as needed |
| | Overpack drums | Less than 2 drums | Weekly |
| | Face shields | Broken or dirty | Monthly/ as needed |
| | Chemical cartridge respirators with cartridges for organic solvents | Less than | Monthly/ as needed |
| | Portable pump | Power, clogging | Monthly |
| | Fire extinguishers | Recharging | After each use |
| | Fire alarm systems | Power failure | Monthly |
| | Telephone system | Power failure | Daily |
| | Emergency lighting system | Battery failure | Monthly |
| | First aid equipment and supplies | Items missing per inventory list | Weekly |
| | Protective clothing | Holes, wear & tear | As used |
| | Pump hoses | Cracks, holes | Weekly |
| | Shovels | Missing; should be two | Weekly |
| | Miscellaneous hand tools | Lost, non-functional | Weekly |

REVISED
SEPT. 22, 1966

| <u>Area/Equipment</u> | <u>Specific Items</u> | <u>Types of Problems</u> | <u>Frequency of Inspection</u> |
|--|-----------------------|---------------------------|--------------------------------|
| <u>Safety & Emergency Equipment (cont'd)</u> | Brooms | Missing, should be two | Weekly |
| | Sprinkler System | | |
| | Flashlights | Batteries dead | Monthly |
| | Fire wall | Integrity | Monthly |

DSW, Inc.

Closure Plan

This section outlines the steps which the subject DSW, Inc.

branch will follow in a closure situation in order to comply with applicable sections of the Resource Conservation and Recovery Act.

Because this branch functions as only an accumulation and transfer point for containerized spent solvents destined for recycling at an off-site facility, partial closure is not relevant. Because the accumulation and transfer of materials which may be classified as hazardous wastes is but a small portion of the total business at this facility, and due to the fact that this hazardous wastes activity is the sole reason for DSW, Inc. being involved in the requirements of this legislation, there exist no partial closure situations. This facility, as it pertains to hazardous waste management activities, is either active or totally inactive as a storage facility.

It should be further noted that because of the nature of the hazardous wastes activity at this facility - only the accumulation and temporary storage of spent solvents in drums until economic truckloads can be shipped to a recycling facility - a post-closure plan is not required.

REVISED
SEPT. 22, 1986

DSW, Inc. will maintain a copy of this closure plan at the branch. The Company is aware that should this branch contemplate closure of the site, the EPA Regional Administrator and the comparable state agency must be notified at least 180 days prior to the date that the Company begins to close the facility.

The maximum number of drums in storage at any one time - the number assumed to be in inventory at the time of closure - will be 90.

DSW, Inc. will continue to operate a business at this facility as long as it is deemed economically viable by the Company; an "anticipated" date of closure is established as 2004 (in twenty years).

The Company is aware that upon completion of closure, it shall be required to submit to the Regional EPA Administrator and the comparable state agency a certification by both DSW, Inc. and an independent registered professional engineer that the facility has been closed in accordance with the outlined proceedings contained in the approved Closure Plan.

In practice, once DSW, Inc. decided to close this site as a hazardous waste storage facility, the required 180-day notice period required by the EPA would be filed and notices sent to customers (the generators) employing DSW, Inc. services

to inform them of the pending discontinuation of receiving their spent solvents. All materials would be removed from the site within 30 days of receipt of the final volume of waste and total closure activities will be completed with 120 days.

Although all waste in storage would be economically recoverable material and consequently would be expected to be transferred upon closure to a recycling facility for the purpose of closure cost calculation the most expensive case - payment to an outside permitted facility for outright disposal of the maximum inventory - has been used. No credit is taken for recoverable values of the spent solvents. A copy of a letter from a major permitted disposal facility agreeing to receive any inventory of spent solvents from DSW, Inc. is appended.

No pretreatment would be required before material would be ready for shipment. Prior to being loaded, all drums would be inspected for leakage, damage, and proper labelling. They would be transported on pallets to a staging area by conventional forklift handling and then placed in trucks for transport. Proper manifest forms would be prepared for each movement.

Because this facility functions strictly as a storage facility, with no treatment or disposal at this location, decontamination activities

would not be anticipated to be necessary. However, if the storage area's history or an accident or spill during closure required decontamination, any significant amount of waste solvent (if any) would be absorbed on an inert material. In addition, the area and any contaminated auxiliary equipment used would be steam-cleaned to the point where no contaminant can be detected. The branch has a source of steam available in the warehouse near the secondary containment area; if it is used to clean this space, the condensate would be contained within the curbed area and then would be absorbed an/or pumped out. Any large equipment, such as forklift blades, would be cleaned inside the curbed area and, again, the condensate collected. Portable equipment, such as shovels, would be placed inside a metal drum and steam-cleaned and the condensate collected.

All condensate from such steam-cleaning, any used absorbent material, and any contaminated wood pallets or other material to be discarded would be considered a hazardous waste. It would be collected in a secure container and transported to a permitted hazardous waste disposal facility under a hazardous waste manifest.

Because of the remoteness of the secondary containment area relative to any earth, no decontamination of soil or earth is envisioned during closure.

DSW, Inc.

Closure Plan
Page 5.

A schedule of the closure steps is depicted on the appended graph.

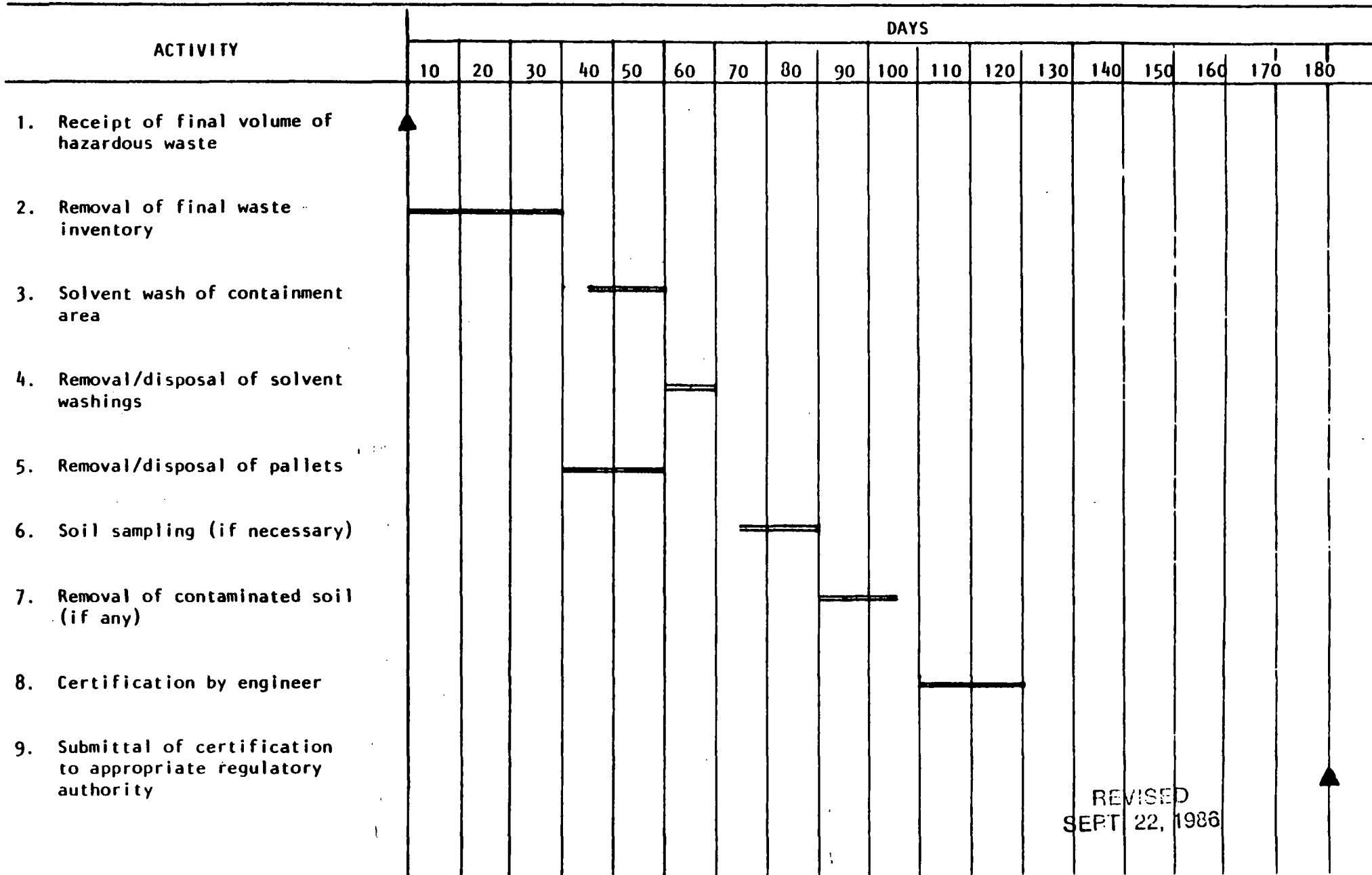
After closure, it is expected that the containment area will revert to general warehouse usage.

This closure plans and the following cost estimate will be kept on file at the DSW, Inc. facility. It will be revised and resubmitted whenever a change in the closure plan affects the cost of closure. It will be reviewed and adjusted annually to reflect changes in closure cost brought about by inflation, utilizing published indices.

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SEPT. 22, 1986

Tampa, Florida Branch

ANTICIPATED CLOSURE SCHEDULE



REVISED
SEPT 22, 1986

RCRA COMPLIANCE-ADMINISTRATIVE

A. MANIFEST, INVENTORY CONTROL

I. Purpose

To provide control of all Federally-required forms relative to the receipt, storage, and transfer of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA).

II. Manifests

Hazardous Waste Manifests - Due to the fact that there is not a federal manifest form, the branch should use the appropriate state form if such a form is mandatory in a given state. For those states presently under a manifest system, the state form may be used provided it contains all of the following information contained in 40 CFR 262.21:

- (1) Manifest document number.
- (2) The generator's name, mailing address, telephone number, and EPA identification number (Federal in addition to state numbers).
- (3) The name and EPA identification number of each transporter.
- (4) The name, address and EPA identification number of the designated facility and an alternate facility, if any.
- (5) The description of the waste(s) (e.g. proper shipping name, etc.) required by regulations of

the U.S. Department of Transportation in
49 CFR 172.101, 172.202, and 172.203.

(6) The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.

(7) The following certification must appear on the manifest:

"This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA."

If your state is under a manifest system presently, you must use that state form and make any necessary modifications to meet the above standards. If a state form is so inadequate as to make modification inappropriate, you will be required to double manifest using the state form in addition to a complying form such as the Labelmaster F-50 form. A hazardous waste manifest must accompany all movements of hazardous waste to, from, and between DSW, Inc. locations.

III. Inventory Control

The concepts of this procedure are based on inventory management methods. An inventory subsystem for hazardous waste requiring its

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SEPT. 22, 1986

own hazardous waste manifest, filing, follow-up, and retention schedule will be necessary to provide adequate control.

IV. Registration

All locations that generate, receive, store, or ship hazardous waste must be registered with the EPA. An EPA I.D. number has been issued for each location. Again, the branch must be aware of any state requirements which will require compliance.

V. Definition

Hazardous Waste Materials have been identified by the EPA in a booklet entitled "Identification and Listing of Hazardous Waste Materials" (EPA 8700-12). All branches have copies.

DSW, Inc. may become involved in the handling of hazardous waste in any of the following manners:

- Generator/Shipper - 1. Material damaged, spilled, or residual from branch operations such as repack or material movement that must be disposed of.
2. Accumulation of sludge from customers that must be shipped to a disposal site or to a recycling plant.

Transporter - Hauling hazardous waste on DSW, Inc.-owned, leased, or-rented vehicles.

TSDF - Treatment, Storage, or Disposal Facility. Whenever hazardous waste is stored or accumulated at a DSW, Inc.

REVISED
SEPT. 22, 1986

location (usually for shipment to a recycling center),
the Company is acting as a storage facility.

VI. Receipt of Hazardous Waste

- A. Source - DSW, Inc. customers.
- B. Reason - Recycling or disposal.
- C. Documentation - Hazardous waste must be accompanied by a hazardous waste manifest which includes the following information (See Exhibit I):
 - 1. Manifest document number.
 - 2. Shipper EPA I.D. number.
 - 3. Carrier name.
 - 4. Carrier EPA I.D. number.
 - 5. Generator/Shipper information:
 - a. EPA I.D. number.
 - b. Name, address, and phone number.
 - c. Date shipped.
 - 6. Transporter information:
 - a. Same as 5a., b., c.
 - b. Even though the Generator/Shipper also is the Transporter, this line still must be completed.
 - 7. TSDF (DSW, Inc.)
 - a. Same as 5a., b., c.
 - 8. Number of units and container type.
 - 9. Identification of the waste as a hazardous material(HM) if applicable.

10. IPA Hazardous Waste I.D. number for each item. Obtainable in the "Identification and Listing of Hazardous Wastes" (EPA 8700-12).
11. Proper shipping name and class per DOT publication 172.101. When a blended material carrying a N.O.S. shipping name is shipped, the hazardous components of the blend should be listed after the shipping name.
12. Per unit weight.
13. Total weight for each item.
14. The Generator signature and date. The manifest must be hand signed. Facsimile signatures cannot be accepted.
15. All Transporter signatures and date - no facsimile signatures. If a Generator is also the Transporter, he must sign as both.
16. TSDF signatures must be signed by DSW, Inc. receiving clerks and dated.

Except for signature requirements, all of the above must be provided by the generator.

NOTE: A DSW, Inc. driver should not pick up any sludge or other waste unless he has pick-up notice. It is extremely important for DSW, Inc. truck drivers to be aware of the necessity for a manifest to accompany H/W shipment, and how a properly prepared manifest should appear. If the above-mentioned items are not present or are not prepared properly, drivers must refuse shipment. Shipping or

REVISED
SEPT. 22, 1986

receiving personnel should be aware of the same requirements in the event a customer brings sludge in on his truck to a DSW, Inc. location, and again, if any items are absent as outlined above, the shipment should be refused.

D. Receiving tickets must be issued upon receipt. In addition to the normal information required on the receiving ticket, the following must be indicated:

1. "Hazardous Waste Material".
2. The hazardous waste manifest number.
3. The receiving ticket number will be used as the lot number for future reference and will be stenciled on each drum received.

The white and yellow copies of the receiving ticket will be sent to the office with the Hazardous Waste Manifest.

E. Hazardous waste manifest routing

1. The receiving clerk will be presented with at least three copies of the Hazardous Waste Manifest. The receiving clerk will:
 - a. Verify that all required information is included on the manifest (Sec. C).
 - b. Verify that all items are received, and then initial each item on the manifest.
 - c. Enter the date received and the receiving ticket number in the identification section for the TSDF.

REVISED
SEPT. 22, 1986

- d. If all items are in order, sign the manifest in the space provided for the TSDF.
 - e. Any discrepancies must be brought to the Transporter and Operations Manager's attention. If the discrepancy cannot be resolved, the load is to be refused.
 - f. Return a signed copy to the Transporter (other than DSW, Inc..
 - g. Attach white and yellow copies of the receiving ticket to the TSDF copy.
 - h. Turn in all manifest copies and attached receiving ticket to the office at the end of each work day.
2. The inventory clerk (or other individual designated by the branch Administrative Manager) will be responsible for the following:
- a. Upon receipt of hazardous waste manifest from warehouse personnel, he must review manifest to insure proper completion including handwritten signatures and cross-referencing of receiving ticket numbers on manifests and manifest numbers on receiving tickets.
 - b. Return the original hazardous waste manifest to the generator. This must be done on a daily basis.
 - c. Detach and submit the white copy of receiving ticket to Accounting.

REVISED
SEPT. 22, 1986

- d. Maintain a "pending shipment" file for the TSDF manifest copy and attached copy of receiving ticket. This pending file will include all manifests covering sludge in stock (from customers) awaiting shipment to recycling facility.
- e. Maintain a perpetual inventory card for every type of hazardous waste material received. These cards will be maintained separately from all other inventory cards.

A separate card should be kept for each type of product waste stream.

The inventory card should show the following:

- 1. Date
- 2. Lot Number
- 3. Manifest number received or shipped on
- 4. Customer name received from or location shipped to
- 5. Units received or shipped
- 6. Balance

VII. Shipment of Hazardous Waste

Shipments of hazardous waste are to be determined by the branch Administrative Manager/assistant or designee. Under NO circumstances can a lot be split. Review of the TSDF manifest copies in the "pending shipment" file should be an integral part in determining shipments.

A. Manifest Preparation (Labelmaster F-50 or appropriate state manifest form):

- 1. Review Section VI-C and Exhibit I. DSW, Inc. must supply the same basic information on shipments to the recycling center that customers provided on

REVISED
SEPT. 22, 1986

their manifests.

2. Accumulate the TSDF manifest copies from the "pending shipment" file that will comprise the shipment.

3. Complete the manifest:

- a. Manifest Document Number (Item 1). Most state forms will have a preprinted number sequence on the manifest form. If a form which is not prenumbered is used, the SDM number preceded by your branch location code number and the initials HWM should be used - for example, 534 HWM000. It may be desirable to designate one column of the ledger for SDM numbers, the initials HW to designate those numbers used as a manifest number, if a state form is not preprinted.
- b. Twelve-digit EPA I.D. numbers must be obtained in advance for items 4, 6, and 7. Maintenance of an EPA I.D. number file for customers, transporters, and TSDF's will facilitate future shipments
- c. Waste Description and Classification (Item 11) will be available directly from the TSDF manifest copies used to put the shipment together. The word "Waste" must precede the description. Immediately below the description, applicable lot numbers and the number of containers from each lot should be cross-

referenced. If more space is needed, the comment section can be used.

- d. Unit weight and total quantity should be stated in pounds.
- e. "Placards Tendered", item 17, must be completed (Shipping Department).
- f. The completed manifest must be signed by the branch manager or his appointed designee.

B. Manifest Routing

1. Remove number 4 (Generator's Copy). Attach the TSDF copy(s) from the original customers and file in another manifest file titled "pending notification". It should be noted that the copy retained may vary on different forms.
2. The remaining copies should be routed to the shipping department.
3. When shipment is made, the Transporter must sign the manifest. If via a DSW, Inc. truck, the driver must sign. Remove number 6, File Copy, and return to the office.
4. Match number 6 to number 4 copy in the "pending notification" file. This file should be set up as a "tickler" file which insures follow-up in 35 days if the number 1, Original, is not returned from the TSDF.

THIS IS THE LAW -- INITIAL FOLLOW-UP MUST BE MADE AT 35 DAYS. EPA NOTIFICATION MUST BE MADE AT 45 DAYS.

REVISED
SEPT. 22, 1986

5. When the hand-signed number 1, Original, is returned, it should be matched to the number 4, Generator Copy and receiving tickets. The "cycle" is now completed; the manifest can be closed and filed (separately from all other records).

VIII. EPA Notification

If the Original, number 1, copy of the hazardous waste manifest is not received in 45 days, the Regional Office of the USEPA must be notified. A list of Regional Offices is shown in Exhibit II. Such notification requires:

- A. A legible copy of the Hazardous Waste Manifest covering the shipment that is missing.
- B. A detailed letter explaining OSW, Inc efforts to locate the material and to obtain the signed manifest.
- C. Notification should be by registered mail.

NOTE: A copy of the notification should be submitted also to the Regional Operations Department.

IX. Hazardous Waste Manifest Control Ledger

Every Hazardous Waste shipment must be assigned a SDM number and have this form accompany the shipment and be recorded in the Control Ledger. The ledger will show the date shipped, the manifest document number, ship to, and the date confirmation manifest received, number 1 copy.

X. Manifest Discrepancies

Upon discovering a major discrepancy between the quantity or type of

REVISED
SEPT. 22, 1986

hazardous waste designated on a hazardous waste manifest and the quantity or type of hazardous waste actually received, the branch must attempt to reconcile the waste discrepancy with the waste generator or transporter. If the discrepancy is not resolved within fifteen days after receipt of the waste, the branch must immediately submit to the USEPA Regional Administrator a letter describing the discrepancy and the attempts to reconcile it, together with a copy of the manifest at issue.

B. OPERATING RECORD

I. Purpose

To provide for the orderly collecting of information required for the Operating Record and its organization and recording.

II. Content

The following information will be recorded as it becomes available and will be maintained in the branch's Operating Record until the storage facility is closed.

- (1) A description and quantity of each hazardous waste received at the branch, where it is stored, and the dates of its receipt and removal. This includes cross-referencing to the number of specific manifest document involved.
- (2) Records and results of waste analyses performed as required by the facility permit.
- (3) Summary reports and details of all incidents that require implementation of the Contingency Plan.
- (4) Records and results of inspections carried out in conformance with the facility's Inspection Schedule.
- (5) Copies of the notices to generators that the DSW, Inc. branches has the appropriate permits for, and will accept, the waste the generator is shipping to the DSW, Inc. branch.
- (6) The most recent closure cost estimate.

III. Retention Schedule

All records, manifest, and reports must be held for three (3) years.

REVISED
SEPT. 22, 1986

C. REPORTING

I. Purpose

To ensure all required information is filed with appropriate regulatory agencies.

II. Biennial Report - Federal

A single copy of a biennial report must be filed with the USEPA Regional Administrator by March 1 of each even-numbered year; it must be submitted on EPA form 8700-13B. It must include the following information for the previous calendar years:

1. The EPA identification number, name, and address of the facility.
2. The calendar years covered by the report.
3. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the reporting period.
4. A description and the quantity of each hazardous waste the facility received during the reporting period. The information must be listed by EPA identification number of each generator.
5. The method of storage (or disposal) for each hazardous waste.
6. The most recent closure cost estimate for the facility.
7. A certification signed by the operator of the facility.

HAZARDOUS WASTE MANIFEST

ORIGINAL - NOT NEGOTIABLE

EXHIBIT 1

1
2
3
4
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CARRIER NUMBER

NAME OF CARRIER

(SCAC)

IDENTIFICATION

| | 12 DIGIT EPA ID # | COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER | DATE SHIPPED OR RECEIVED |
|--|-------------------|---|--------------------------|
| GENERATOR SHIPPER 5 | | | |
| TRANSPORTER # 6 | | | |
| TRANSPORTER # 2 (if required) | | | |
| TSD/TREATMENT STORAGE OR DISPOSAL FACILITY 7 | | | |
| TSD/TREATMENT STORAGE OR DISPOSAL FACILITY | | | |

WASTE INFORMATION

| NO. OF UNITS & CONTAINER TYPE | HM | EPA HAZ. WASTE ID # | DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203) | UN # or NA # | EXEMPTION OR NO LABELS REQUIRED | FLASH POINT (IN °C) WHEN REQ'D | UNITS WT/VOL | TOTAL QUANTITY | RATE | CHARGE (For C Use) |
|-------------------------------|----|---------------------|--|--------------|---------------------------------|--------------------------------|--------------|----------------|------|--------------------|
| 8 | 9 | 10 | 11 | | | | 12 | 13 | | |

SPECIAL HANDLING INSTRUCTIONS

If an RC commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chem 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

17
PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD

Amt: \$

C.O.D. FEE: PREPAID ☐ COLLECT ☐ \$

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is 'carrier's or shipper's weight.'"

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

TOTAL CHARGES: \$

FREIGHT CHARGES

FREIGHT PREPAID ☐ FREIGHT COLLECT ☐ Check box if freight is checked ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or

any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

15
This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

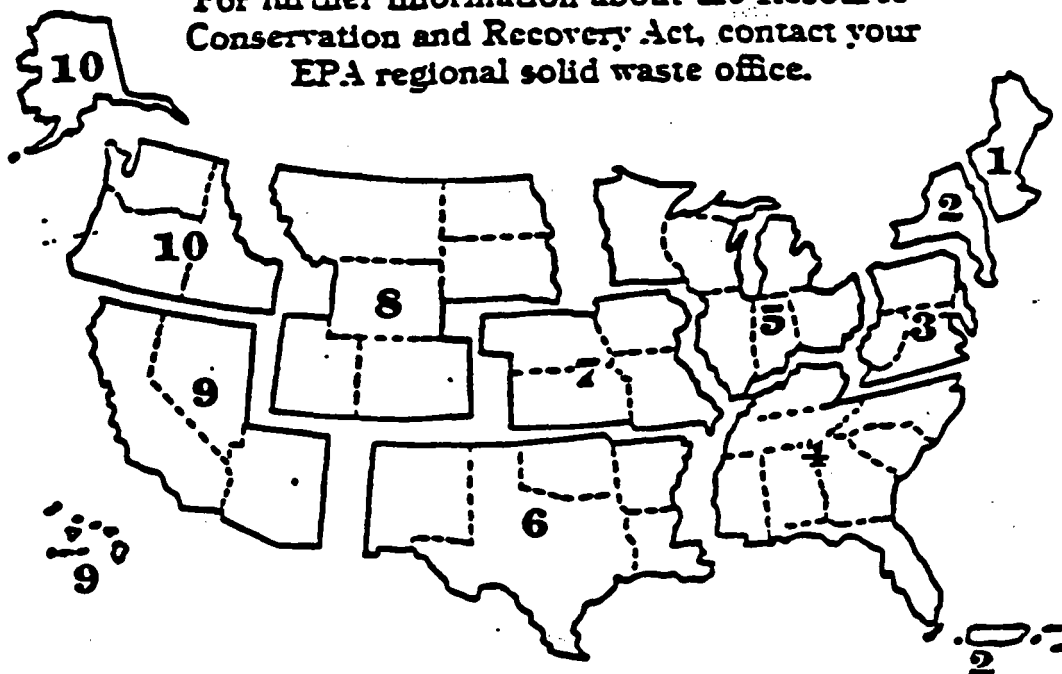
14
GENERATOR'S SIGNATURE

DATE

16
TSD/TREATMENT SIGNATURE

DATE

For further information about the Resource Conservation and Recovery Act, contact your EPA regional solid waste office.



Region 1
Solid Waste Program
John F. Kennedy Building
Boston, MA 02203
617-223-5777

Region 2
Solid Waste Section
26 Federal Plaza
New York, NY 10007
212-264-0503/4/5

Region 3
Solid Waste Program
6th and Walnut Streets
Philadelphia, PA 19106
215-597-0980

Region 4
Solid Waste Section
345 Courtland Street, N.E.
Atlanta, GA 30365
404-881-3016

Region 5
Solid Waste Program
230 South Dearborn Street
Chicago, IL 60604
312-886-6148

Region 6
Solid Waste Section
1201 Elm Street
First International Building
Dallas, TX 75270
214-767-2645

Region 7
Waste Management Section
324 East 11th Street
Kansas City, MO 64106
816-374-3307

Region 8
Solid Waste Section
1860 Lincoln Street
Denver, CO 80203
303-837-2221

Region 9
Solid Waste Program
215 Fremont Street
San Francisco, CA 94105
415-556-4606

Region 10
Solid Waste Program
1200 6th Avenue
Seattle, WA 98101
206-442-1260