DEPARTMENT OF ENVIRONMENTAL REGULATION

WPB.

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

		INITIAL / DATE
1.	TO: (NAME, OFFICE, LOCATION) CRAIG DILTS, DER, Tally.	
2.	Route to File Chem Waste State Permit	
3.		
4.	CWB 9/0 X	

REMARKS:

Attached is a copy of correspondance from CWMI for your records. We will send you as soon as we complete the write-up of the rough draft of the permit for your review and comments. There still remains one or two minor things to be worked out on site. Thanks.

INFORMATION	
	REVIEW & RETURN
	REVIEW & FILE
	INITIAL & FORWARD
DISPOSITION	
	REVIEW & RESPOND
	PREPARE RESPONSE
	FOR MY SIGNATURE
	FOR YOUR SIGNATURE
	LET'S DISCUSS
	SET UP MEETING
	INVESTIGATE & REPT
	INITIAL & FORWARD
	DISTRIBUTE
	CONCURRENCE
	FOR PROCESSING
	INITIAL & RETURN

FROM: Ch Omsph

DATE 8/11/83

PHONE SC 451-5005

ALD000622464

Chemical Waste Management, Inc.
Southeast Area Sales Office
2110 Newmarket Parkway, Suite 111
Marietta, Georgia 30067
404/952-0444

ALD 000622464

August 2, 1983

Mr. Charles Ouseph
Supervisor, Hazardous Waste Permitting
Southeast Florida District
Department of Environmental Regulation
3301 Gun Club Road
West Palm Beach, Florida 33402

RECEIVED
AUG 15 1983
Hazardous Waste

RE: Response to Comments
Pompano Part B Application

Dear Mr. Ouseph:

I have reviewed your comments of May 13 and June 15, 1983 concerning our Part B application and the existing facility. The physical improvements described in my letter of June 6, 1983 to Mr. Roy Duke have now been accomplished. In addition the entire storage area floor has been sealed with Mirro Flex. A description of this material is provided for your review.

All of your comments concerning the application have been addressed and where required changes have been made in the Part B application. For your convenience I have provided a key which correlates your comments with our responses as well as the location of any resulting changes in the Part B. Further, I have provided revised pages for your application.

If you have any questions, please contact me.

Sincerely,

CHEMICAL WASTE MANAGEMENT, INC.

Don R McCombs

Don R. McCombs, P.E.
Regional Engineer

DRM/djl

Enclosures

cc: Rita Ford w/enclosures (except compatibility chart)

RECEIVED
AUG 8 1983
Dept. of Environmental Reg.
West Palm Beach

CUSTOMER SERVICE BULLETIN

SCHNEID, INC.

MIRRO FLEX

POLYURETHANE SEAL FOR CONCRETE TERRAZZO AND MAGNESITE

DESCRIPTION

This product, built around a tough polyurethane resin, has been carefully formulated to maximize adhesion on concrete, terrazzo and magnesite floors. It is designed to spread easily with mop, applicator or squeegee, whereupon it deeply penetrates and seals the pores in these floors with a light colored, abrasion resistant polyurethane. Use of this seal will end dusting and staining problems forever. It is so hard that soils, greases, food spills and rubber marks do not stick to it, thus easing the maintenance task and cutting labor costs. It gives these sensitive floors remarkable chemical and solvent resistance as well as reducing pitting and erosion. Two coats produce a brilliant, long lasting gloss that looks fresh and new long after conventional seals have failed. Its quick dry time also reduces the down time of the treated area.

USE

For best results this product should be applied to new, clean concrete after it has aged at least 40 days and has been acid etched. On old concrete, all previous seals should be stripped off and floor cleaned thoroughly before initial application.

This product is ideal for sealing concrete floors in warehouses, food processing plants, chemical and other industrial operations, where its chemical resistance checks pitting and erosion. Its abrasion and rubber burn resistance gives superior durability under twisting and turning forklifts. It is not affected by gasoline, grease, oils, brake or transmission fluids so it gives superior results when applied to garage, service station or machine shop floors. On decorative terrazzo and magnesite, its brilliant gloss enhances the beauty of these floors while it protects and eliminates the problem of soaked-in stains and ground-in dirt. On all these types of floor usage its toughness continually minimizes cleanup problems resulting in easier, less costly maintenance programs.

TECHNICAL DATA

Type	Oil Modified Polyurethane
Color (Gardener)	5
Film Color	Pale
Viscosity (Gardener)	A-B
Solids	30% Min.
Specific Gravity	0.865
Rubber Burn Resistance	Excellent
Slip Resistance	Very Good
Skinning Resistance	Very Good
Weight/Gallon	7.22 Lbs.
Durability	Excellent
Tabor Abrasion Resistance	75
Sward Hardness (1 week)	28
Diluent (and cleanup)	Mineral Spirits
Flash Point (COC)	105°F. Min.

Dry Time (hours):	
Tack Free	2
Hard	4
Hard Set	8
Penetration	Excellent
Chemical & Solvent Resistance:	
Acids	Very Good
Alkali	Very Good
Detergents	Excellent
Alcohol	Excellent
Gasoline	Excellent
Boiling Water	Excellent
Gloss	Excellent

FOR COMMERCIAL AND INDUSTRIAL USE ONLY.

NO. 5825–1079

(see over)

1429 FAIRMONT AVE. N.W. • ATLANTA, GEORGIA 30318 • PHONE 1-800-241-9653 • IN GEORGIA 404-351-4705

A CHEMICAL AND SOLVENT RESISTANCE SEALER FOR CONCRETE, TERRAZZO AND MAGNESITE FLOORS.

DIRECTIONS

NEW FLOORS—After floor has aged at least six (6) weeks, clean surface thoroughly, removing all grease and oil. Mop with a 10% solution of Muriatic acid to etch and neutralize floor. Rinse freely and allow to thoroughly dry. Apply seal with an applicator, mop or squeegee, using even, thin strokes. Allow first coat to dry 10-12 hours, then apply second coat.

OLD FLOORS—Floor must be thoroughly cleaned before new seal can be applied. If unknown old seal, paint or varnish is present, apply a thin film of a non-flammable paint stripper using an old floor brush or applicator. Allow stripper to loosen old coating (10-30 minutes), then sprinkle lightly with saw dust and scrub dry with a machine equipped with a wire brush. Sweep up all residue. Proceed following directions listed under "new floors". Disregard the "aging" portion.

DANGER — KEEP OUT OF REACH OF CHILDREN. Contains petroleum distillate. Combustible mixture. Harmful or fatal if swallowed. Call physician immediately. Keep away from heat and open flames. Keep building well ventilated during application and while drying. Keep container closed when not in use.

NO. 5825—1079

RESPONSE TO STATE OF FLORIDA, WEST PALM BEACH OFFICE,
COMMENTS DATED MAY 13, 1983

Comment Number	Response	Location of Changes, if any
Compatability chart	The attached magnified compatability chart, provided earlier as Exhibit a-9-4, has been provided per your June 15, 1983 request. This chart is an integral part of the training program referred to in E-5 of the State of Florida application for a hazardous waste facility permit originally submitted to your office.	Page (a) (9)-1, a reference has been added to Exhibit a-9-4.
I. D-2	As agreed the maximum storage capacity of this facility is currently 180 drums. The Part A application was amended earlier to reflect this capacity.	
(b) (c) & (d)	Since CWM requires all shipments to be scheduled, it can be assured that no additional drums will be accepted until space is available. If the facility is ever loaded to capacity and the drummed wastes cannot be removed from the facility due to an act of God or otherwise, no additional drummed wastes will be brought to the facility. Thus in-flow and out-flow of drummed wastes will be managed such that the 180 drum storage capacity of the facility will not be exceeded.	None
(e)	An aisle space of 3 feet will be maintained inside of each storage bay, as is referred to in your 6/15/83 letter, so as to allow ease of inspection. This aisle will run east-west approximately in the middle of each bay.	Pages (a) (9)-2 and (b) (1)-1; Exhibit b-1-2, references to the three foot aisle have been added.

RESPONSE TO STATE OF FLORIDA WEST PALM BEACH OFFICE COMMENTS DATED 5/13/83

II. B-3&D-5 (a) (b)	The procedures and equipment for access control/traffic control have been modified. The gate is now locked at all times. A button has been installed near the gate which sounds an audible signal inside the transfer station. Only authorized persons are then admitted by means of a remote controlled gate opening/closing device activated from inside the transfer station. Regular inspections of this equipment are included in the inspection plan.	Pages (a)(4)-1 and (a) (10)-2; Exhibit a-5-1, references to the new security procedures have been included.
III D-4	The additional aisle space agreed to in your 6/15/83 letter will allow for visual inspection of drums at close distance.	Exhibit b-1-2, a sketch of the aisle space has been added.
IV E-2	The additional aisle space in the storage bays will facilitate the movement in the event of an emergency.	Exhibit b-1-2
I E-2	To prevent the comingling of incompatible wastes during a fire or explosion, two modifications were agreed to in your 6/15/83 letter. (1) Incompatible wastes will be stored one bay apart. (2) Four foot high barriers of fiberglass or other acceptable material are being installed between the storage bays on top of the existing 6" high curbs to reduce the potential for comingling of wastes in adjacent bays. The barriers will be installed with openings in conjunction with the 3 foot aisle space to facilitate drum inspections.	Page (a) (9)-2 Exhibit b-1-2

RESPONSE TO STATE OF FLORIDA WEST PALM BEACH OFFIC COMMENTS DATED 5/13/83

VII (a) & (b)	As agreed to in the 5/24/83 meeting between Don McCombs of Chemical Waste Management, Inc. and Roy Duke of the Florida DER the maximum storage capacity of the facility is 180 drums. The additional aisle space will facilitate inspections and improve accessability during emergencies. The installation of 4 foot high barriers between the bays and the practice of storing incompatible wastes one bay apart, will insure the safe storage of 180 drums of material.
(c)	Due to all the improvements summarized in (b) above, the 45 day storage time limit would appear unnecessary. It is requested that this time limit be dropped.
(d)	The present secondary containment system has been designed to provide containment volume of 10% of the volume of the containers stored and to effectively allow liquids to flow by gravity from the concrete collection pits, through a polypropylene pipe and valve, into a collection tank. Because the connection from the floor sump to the containment vessels allows gravity flow through a value, the sump can be completely drained and flushed and the valve closed before vessels are moved thereby preventing any spillage. The present tanks will be replaced by DOT exempt (DOT-E 8839) vessels - referred to in Jim Bock's CWM communication to Charles Ouseph dated May 25, 1983 - which can be sealed and transported directly to an approved hazardous waste management facility for disposal and/or emptying and cleaning. Because these vessels are directly connected to the polypropylene pipes there is no need to provide roofing or secondary containment.

RESPONSE TO STATE OF FLORIDA WEST PALM BEACH OFFICE COMMENTS DATED 5/13/83

(g)	The eyewash station, emergency shower and other personal safety equipment have been properly located.	
(h)	Oil-Dry (trade name) absorbent material will be used to clean up spills as appropriate. This clay-based material is inert and compatible with materials stored at this facility.	Exhibit a-5-1, Oil-Dry is the absorbent now indicated in the inspection schedule.

LIST OF EXHIBITS

LIST OF EXHIBITS (Continued)

LIST OF EXHIBITS (Continued)

122.25(a)(4) Description of Security Requirements

The Chemical Waste Management, Inc.--Pompano Transfer Station is secured by two distinct security perimeters. The entire transfer station is surrounded by a 6 foot chain link fence topped with three strands of barbed wire. This fence comprises the primary security perimeter for the facility (see Appendix Blueprints 82-0067-A and -D).

Inside this primary enclosure are two distinct structures: the transfer station and the transfer station office. Access to these structures is controlled by a 20 foot automatic gate centered on the north fence line. Only the four transfer station employees have keys to the padlock which locks the gate. The gate will be closed during operating hours of the transfer station (8:00 a.m. to 5:00 p.m. Monday through Friday). An audible signal is in-place to notify the office administrator that access is needed by a truck driver. The gate is opened automatically from the transfer station office when access is required. At all other times the gate is locked with a padlock. On the fence surrounding the transfer facility are signs visible from at least 25 feet in all directions with the legends in English and Spanish:

"DANGER! UNAUTHORIZED PERSONNEL KEEP OUT!" and
"PELIGRO! SE PROHIBE EL PASO A TODA PERSONA NO AUTHORIZACION!"

(See Exhibit a-4-1 and a-4-2)

The primary security perimeter as well as the transfer station truck parking area is located deep within a secondary security perimeter (see Appendix Blueprints 82-0067-A and -D). The transfer station is completely surrounded by the Southern Disposal Service compound, a wholly owned

Finally, the schedule indicates the frequency of inspection for each identified inspection item. These frequencies are based on the rate of possible deterioration of the equipment and probability of an environmental or human health incident if deterioration, malfunction, or operator error goes undetected between inspections. As indicated in the schedule, the area subject to spills, specifically the loading dock area containers, container storage areas and associated containment systems are inspected daily when in use.

Remedial Action

As required by 264.15(c), any deterioration or malfunction of equipment or structures detected during inspection at the Pompano facility are remedied on a schedule - immediately if necessary - which ensures that the problem does not lead to environmental or human health hazard. Specifically, in compliance with 264.171, any leaking container discovered is immediately lifted into an oversized recovery drum and sealed, and any leaked or spilled material is immediately absorbed by oil dry. The Contingency Plan, presented in 122.25(a)(7) of this permit application, provides a comprehensive set of remedial actions for all potential threats to human health or environment discovered during facility inspections. The facility's Inspection Log, presented as Exhibit a-5-2, contains a final column for recording the date and nature of any repairs or other remedial actions taken in response to problems identified during a facility inspection.

Inspection Log

In accordance with 264.15(d), the Pompano facility maintains in its office an Inspection Log (Exhibit a-5-2) containing both Daily Inspection Log Sheets and Weekly Inspection Log Sheets. Each log sheet includes, at the top, spaces for identifying the inspector's name and title, and inspection date and time. In addition, each log sheet is divided into five columns, including ones for equipment/area inspected, types of problems/inspection procedures, status (acceptable/unacceptable), observations, and remedial actions (date/nature). Individual log sheets are kept in the Inspection Log for three years from the date of the inspections.

GENERAL INSPECTION SCHEDULE (Continued)

EQUIPMENT	TYPES OF PROBLEMS TO BE LOOKED FOR	FREQUENCY OF INSPECTION
Storage Bays and Catch Basins	-check for evidence of spilled material.	Daily, when in use
	-check curbs and 4-foot divider walls to ensure structural integrity	
Drain Valves for Catch Basins	-make sure valves are in good condition, that they can be turned from the open position to the closed position back to the open position.	Daily, when in use
	-check that valve is left in open position after inspection.	Daily, when in use
Stored Drums	-check for leaks, corrosion, and swelling of drums.[1]	Upon removal at generator's facility
	-on open head drums is chine seal properly sealed.	Daily, thereafter, in storage.
	-insure adequate space available for maneuvering forklift trucks.	Daily, when in use
	-check to see incompatable wastes are not stored together.[2]	Daily, when in use
Forklift Truck	-check hydraulic fluid level.	Daily, when in use
	-overhaul.	Every 3 months
Drum Lifting Attachment to Forklift Truck	-check that drums hold securely and release easily.	Weekly
Hand Truck	-check tires for adequate inflation.	Weekly
Overhead Lights	-check all switches, report bad lamps to maintenance.	Weekly

Exhibit a-5-1

GENERAL INSPECTION SCHEDULE (Continued)

EQUIPMENT	TYPES OF PROBLEMS TO BE LOOKED FOR	FREQUENCY OF INSPECTION
Chemical Resistant Pressurizable Suits	-insure suit is accessible.	Weekly
	-don suit while wearing self-contained breathing apparatus. Check to see that suit holds pressure.	Every 6 months
Alarm	-insure alarm activates from both stations in transfer facility.	Daily
	-insure accessibility.	Daily
	-listen for audible alarm.	Daily
	-check to make sure red light is functioning.	Daily
Beeper System	-check that beeper activates with phone call	Daily
Safety Shower	-check that shower activates and shuts off properly.	Weekly
	-insure accessibility.	Weekly
Eyewash	-check that eyewash activates and shuts off properly.	Weekly
	-check air pressure gauge and water level.	Weekly
Telephone inside Transfer Station	-check phone for incoming and outgoing calls.	Weekly
Disposable Charcoal Filter Respirators	-insure an adequate supply on hand, at least 3 per employee.	Weekly
Oil Dry Absorbant Storage Drum	-check for an adequate supply; minimum inventory is one drum.	Weekly

Exhibit a-5-1

GENERAL INSPECTION SCHEDULE (Continued)

EQUIPMENT	TYPES OF PROBLEMS TO BE LOOKED FOR	FREQUENCY OF INSPECTION
Recovery Drums	-check if supply is adequate; minimum inventory is 6 drums.	Weekly
Chemical Resistant Gloves	-insure an adequate supply, at least 2 pair per employee.	Weekly
First Aid Kits	-check for accessibility and supply.	Weekly
SECURITY DEVICES		
Fence & Gate	-inspect entire perimeter for breeches, corrosion.	Weekly
	-insure gate opens & closes freely, upon signal from office.	Weekly
	-make sure gate lock functions properly.	
	-make sure buzzer operates properly.	
Bilingual Warning Signs and No Smoking Signs	-check that signs have not been detached, obscured, or defaced.	Weekly
Watch Clock Station	-check for accessibility.	Weekly
	-check that emergency coordinator name placard is secure, legible and correct.	Weekly
South Doors of Transfer Station	-check that doors open and close easily for quick exit.	Weekly
OPERATING AND STRUCTURAL EQUIPMENT		
Loading Dock and Immediate Area	-check loading dock levelers for operational capability.	Daily when in use and after each use, otherwise weekly.
	-check for evidence of spilled material on dock and slab.	

bays immediately behind the loading docks and in the overpacking bay adjacent to the loading dock. The loading dock floor, the floor of the four storage bays behind the dock, and the floor of the bay adjacent to the loading dock, are sloped toward the rear of the building (see Appendix A, Blueprint ASI). Catch basins run transversely across the storage bays; catch basins for each bay are separated by concrete walls to prevent inadvertent mixing of incompatible wastes. More details of the facility containment is provided in Section 122.25(b)(1) of this application. The bays are separated by six inch curbing. Any run-off from the hazardous waste handling areas would follow the slope of the floor and be collected in the catch basins which drain to one of five external 220 gallon storage containers. Additionally, 65 gallon recovery drums and absorbant (oil dry) for overpacking any drums which might leak are maintained in the facility.

Water run-off from waste handling areas is minimized through several means as follows:

- all waste handling areas are inside the transfer station, and are fully roofed and enclosed on three sides
- waste handling areas are set back a minimum of 5 feet from the roof-line of the open side of the transfer station. Waste storage areas are set back approximately 20 feet
- water is not used to wash-off handling areas.

In the event water was to reach the waste handling areas, it would run-off into the catch basins as previously described.

Flooding of the facility is prevented through several means. Primarily, the facility is not located within a flood plain (See Section 122.25(a)(11)); it is enclosed on three sides and roofed; and all waste handling areas are raised five feet above grade.

iii. Contamination of water supplies.

Contamination of water supplies is prevented by means discussed in the previous section; wastes are never handled or stored outside of the designated

122.25(a)(9) Description of Precautions to Prevent Accidental Ignition or Reaction of Ignitable, Reactive or Incompatible Wastes as Required to Demonstrate Compliance with 264.17 Including Documentation Demonstrating Compliance With 264.17(c)

The Chemical Waste Management, Inc.--Pompano Beach Transfer Station has in-place a combination of design and procedural measures to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes. These measures are designed to separate and protect wastes from sources of ignition (e.g., open flame, sparks, heat) and spontaneous ignition (e.g., from reaction of incompatible materials) and prevent reactions which:

(1) generate extreme heat or pressure, fire or explosions, or violent reactions;

(2) produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;

(3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

(4) damage the structural integrity of the device or facility; or

(5) through other like means threaten human health or the environment.

Ignition or reaction of ignitable, reactive or incompatible wastes is prevented by the following measures:

- Containers are segregated into 4 designated waste container storage bays. Each bay is separated by a minimum 6" concrete curbing and the floor is sloped (1/8 in/ft) such that any spilled material would flow to a separate catch basin and container dedicated to each individual storage bay.

- Only compatible wastes are stored together within a storage bay. CWM truckdrivers are trained to segregate wastes into compatible groups (i.e., acids, bases) following J.T. Baker training manual and EPA compatability charts (see Exhibit a-9-4). Temporary signs are posted above each storage bay designating the waste type stored within that bay.

- All waste materials are handled in closed 30, 55, or 85 gallon containers only.

- Containers are not opened for sampling at the facility, except when necessary (e.g., loss of shipping labels during transport). Protocol for sampling is that specified in the Waste Analysis Plan in 122.25(a)(3).

4/25/83 FLDER
7/11/83 FLDER

- No wastes are mixed, comingled or otherwise treated and/or disposed at the facility.

- Smoking is not permitted anywhere within the transfer station except in a designated smoking area in the station office which is separate from the waste loading dock and storage building. Signs bearing the legends "NO SMOKING!" and "NO FUMAR!" are prominently displayed just inside the loading dock and waste storage building, as well as on the fence of the transfer station. A photograph is provided as Exhibit a-9-1.

- No hazardous waste drums are stacked at any time during storage at the facility

- No cutting, welding, or other open flames are permitted within the transfer station. All such activities are performed at the Southern Disposal Company Maintenance Shop.

- No heaters exist within the transfer station.

- The metal structures comprising the roof and walls of the transfer station are grounded via cables to ground stakes at the four corners of the building.

- The forklift truck used to move the containers is diesel powered rather than by gasoline, propane, or electric power.

- Use of the drum handler (photograph provided as Exhibit a-9-2) minimizes the chances of ignition from friction spark, puncture of a container, or frictional heat.

- Detailed instructions are provided to generators to assure proper containerization of shipped wastes. In addition, standard procedures are used to sample each waste shipment prior to shipping, document waste contents, and ship wastes to assure proper handling at all times. Details are provided as Exhibit a-9-3.

- The building is ventilated through a continuous roof ventilator along the 43' length of the storage building and through the open wall in the north side of the building.

- Wastes are protected from rain, direct sunlight, and other potential adverse climatic conditions by an enclosed storage building. Wastes are also set back from the open end of the building by a minimum of 20 feet.

- Routine inspections of drums and drum storage bays provide additional protection against leaks.

- Incompatible wastes (e.g., caustics and acids are stored one bay apart).

- Bays are segregated by a 4-foot barrier on top of the 6" concrete curb, designed to prevent mixing of wastes between each bay. Each barrier will have an opening corresponding with the 3-foot aisle to allow access for inspections.

These measures were included in the operating plan of the Pompano facility specifically to prevent the ignition or reaction of ignitable, reactive, or incompatible waste. Additional information on these measures are presented in Section 122.25(b)(1)(iii) of this application.

Exhibit a-1

Alarm and Communications Equipment

- Two alarm activation switches, one in the drum storage area, and one inside the block-house room inside the transfer station
- Telephones on the wall inside the transfer station and several inside the transfer station office
- A pager carried at all times by the Emergency Coordinator
- Two hand-held emergency airhorns next to each alarm activation switch.

Spill Control Equipment

- Absorbant, located in the transfer station
- A secondary containment system for the drum storage area including 5 emergency 220 gallon polyethylene storage containers.

Fire Equipment

- All vehicles and operation areas are equipped with fire extinguishers rated for a minimum of B/C fires (dry chemicals or foam) for flammable liquids (B) and electrical equipment (C).

  Fire equipment is located in the following areas:

  1. Office - two 18 lb. dry chemical units
  2. West wall of transfer station
     - 1 - 16 lb. Halon unit
     - 1 - 16 lb. dry chemical unit
     - 1 - 22 lb. dry chemical unit
     - 1 - fire blanket
  3. South wall of transfer station
     - 1 - 16 lb. Halon unit
     - 1 - 16 lb. dry chemical unit
     - 1 - 22 lb. dry chemical unit
     - 1 - fire blanket
  4. In transfer station, one 1200 lb. portable dry chemical unit
  5. On each truck, one 20 lb. dry chemical unit
  6. Outside of the facility a fire hose and hydrant capable of delivering water at 750 GPM @ 135 psi.

- These extinguishers are inspected in accordance with Section 122.25(a)(5) and replaced as required.

Traffic volume on the Southern Disposal Company site (but off-site of the transfer station) averages 1,211 truck and 392 auto one-way vehicle trips per day, based upon data from an average recent week beginning June 27, 1982.

Off-site traffic controls, specifically traffic lights, are also indicated on Exhibit a-10-1.

On-Site Traffic

On-site traffic to the transfer station follows an industrial asphalt paved road from the Southern Disposal Company gate at 48th Street directly south past the west side of the Southern Disposal Company office and garage 300 yards to the transfer station area. This access road is completely paved to an area approximately 50 feet from the transfer station loading area. This area consists of compacted crushed stone which was placed in a manner which provides sufficient load bearing capacity. Details on the aggregate paving are provided in the Appendix: Construction Specifications. Actual surface of 48th Street and the small crushed stone paved area has proven to have sufficient capacity to handle all incoming and outgoing Chemical Waste Management, Inc. trucks. This is further evidenced by the use of 48th Street by solid waste and asphalt trucks.

On-site traffic volume at the transfer station averages two truck and eight auto one-way vehicle trips per day, based upon an average of one waste shipment and four employees on-site per day.

On-site traffic at the transfer station is controlled in the following way: all trucks using the facility are owned and operated by Chemical Waste Management and bear the company insignia. When a driver arrives, the driver pushes a button which rings a signal in the station office. The truck can only enter the facility when the gate is opened by a CWM employee. The access to the facility is generally observed by the Transfer Station Administrator and controlled by the automatic gate described in Section 122.25(a)(4).

122.25(b)(1) Description of Container Storage

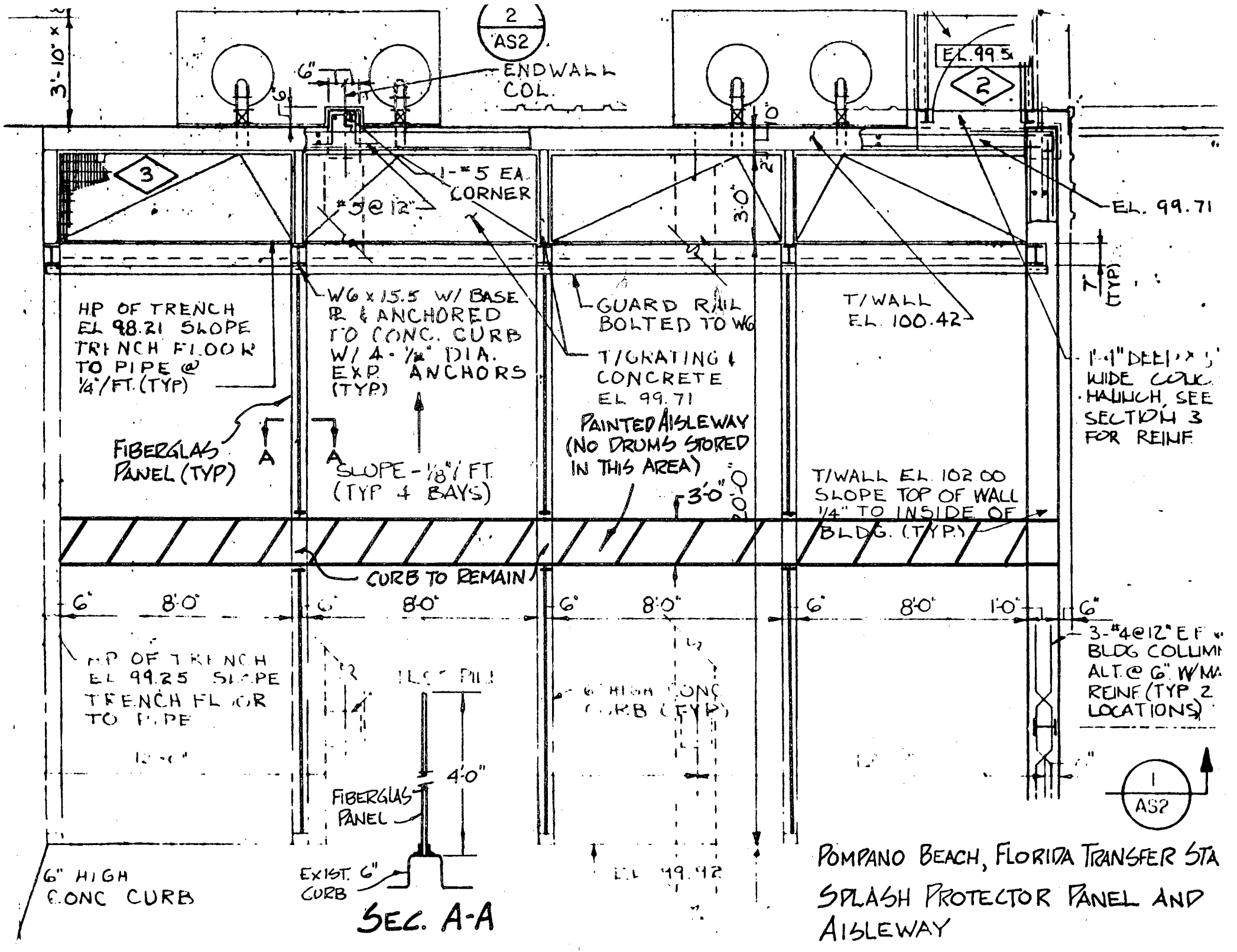
The Chemical Waste Management, Inc.--Pompano Transfer Station stores hazardous waste in standard DOT approved 30, 55, and 85 gallon drums. Specifications (i.e., dimension, materials of construction) are provided in Exhibit B-1-1.

Containers accepted at the Pompano facility must be in excellent condition (i.e., free of leaks, excessive rust or dents, no visible signs of excessive corrosion). All drums are carefully inspected by a trained Chemical Waste Management, Inc.--Pompano truck driver before pickup at the generation site for shipment to the Pompano Transfer Station. The truck driver is also trained to inspect 1.) that all container markings including DOT and EPA required labels, placards and tags are present on each drum, 2.) that the appropriate manifest and shipping papers accompany the waste shipment and 3.) that waste types listed on the shipping papers are compatible with the container used. CWM truck drivers use a J.T. Baker training seminar manual for inspection guidance which includes a general compatibility chart. These inspections are intended to screen incoming wastes in order to minimize the potential for accidents during transfer and storage.

Appendix Blueprints 82-067-D and AS1 provide a floorplan of the waste storage bays at the Pompano Transfer Station. As shown, aisles are provided behind, beside and in front of the drum storage bays, providing a clear view of all drums. In addition, a 3-foot aisle is provided down the center (east to west) of each bay to provide access for inspection. Daily inspection of the drum storage area involves a close look at drums from the walkways. The aisles provided in the center of each storage bay allow a clear view of all drums from the walkways (involving a maximum depth of 3 drums from each vantage point) is available. This view is adequate to clearly see leaking or damaged drums in order to provide clean-up response. A layout of the facility storage areas and aisle space is provided in Exhibit b-1-2.

As previously stated, the Chemical Waste Management, Inc.--Pompano Transfer Station only stores wastes for short periods of time (generally less than 10 days). As a result, leaking drums associated with long-term storage of wastes is not commonly encountered. Therefore, clear access to each drum in the storage bay is not necessary.

Exhibit b-1-2: Aisle Space and Barriers



SEC. A-A

POMPANO BEACH, FLORIDA TRANSFER STA

SPLASH PROTECTOR PANEL AND AISLEWAY

122.25(b)(1)(i) - Description of Containment System

A. Basic design parameters, dimensions, and materials of construction for the Chemical Waste Management, Inc.--Pompano Transfer Station are depicted in the Appendix, Blueprints AS_1, and AS_2. Basically, the containment system is composed of: 1) the concrete floor, 2) concrete curbing around and a 4-foot wall between the four storage bays, 3) a collection trench at the rear of each bay, 4) piping from the collection trench through the building to external storage units, and 5) external storage units.

The floor consists of a 10-inch, cast-in-place, reinforced concrete slab coated with a Federal Specifications TT-6-800A, Class I floor sealer. Construction specifications followed during floor placement are provided in the Appendix: Construction Specifications. The floor slopes, from the front of the storage area to the rear of the area, at a declination of one-eighth inch per foot. The floor area is divided into four storage bays by 6-inch concrete curbs running 20 feet from front to back of the storage area. In addition, each bay is separated by a 4-foot wall which will prevent cross-mixing of wastes due to a spill or leak. There is no curbing along the front of the storage bays since the floor is sloped to prevent only leaked material from escaping the storage area by this route.

The coated concrete flooring of the storage area provides sufficient leak containment. In general, leaks occur very infrequently due to inplace inspection procedures before placement of wastes into storage bay and during storage. In the case of a leak, rapid clean-up response precludes the mass absorption of waste into the flooring; therefore, use of plastic liners in the storage areas is not considered to be necessary.

Continuous with the floor, and running transversly across the building at the rear of the storage area, is a cast-in-place concrete trench to collect any spilled material runoff from the storage bays. The trench is divided into four sections, coinciding with the four storage bays, by transverse concrete walls. The floor of each is sloped toward a drain. Similarly, the overpack area is sloped toward a collection trench. Each of the four trench drains and

122.25(b)(1)(ii) - Sketches, Drawings, or Data Demonstrating Compliance with 264.176 and 264.177(c):

Compliance with 264.176: Special Requirements for Ignitable and Reactive Wastes

At a minimum, all containers holding ignitable and reactive wastes are stored 50 feet within the facility property line. More details are provided in Appendix Blueprint C-1.

Compliance with 264.177(c): Special Requirements for Incompatible Wastes

To prevent the contact of incompatible wastes (e.g., acids with bases, water reactives and aqueous solutions), containers are separated into 4 storage bays and an additional "overpack" bay which is only used for packing defective 55 gallon drums into sound oversized 65 gallon drums (a rare event) (Exhibit b-1-ii-1). Temporary signs are posted above each storage bay to designate the waste group stored within that bay. In general, incompatible wastes are separated by a bay (i.e., acids would not be stored immediately adjacent to bases). Each bay is isolated from other bays by 6" high curbing and a 4-foot wall between each bay. Storage bay floors are sloped such that any spilled waste flows to segregated catch basins which drain via an installed polypropylene pipe and valve to a storage container outside the storage building. During normal operation these valves are open and containers are in place so that the drainage system is available for response to any inadvertant spill of waste in the containment area. Any spills will thus be collected and quickly removed for disposal. This design allows segregation of any spilled material which, through contact with other wastes, could result in reaction, ignition or other hazardous occurrence. Details of the waste drum segregation design are provided in the facility blueprint in Appendix Blueprint AS1.

Chemical Waste Management, Inc.
Pompano Beach Facility
2700 N.W. 48th Street
Pompano Beach, Florida 33067
Mailing Address:
P.O. Box 63-4518
Margate, Florida 33063

305/973-6666
In Florida Wats: 1-800-432-4526

DER-WPB	Copy ✓ Route ☐ Action A		
DM	PER.	BAQM	
SEM	ENF.	WQM.	
PT.P.	P/A		
AA	E.C	E. ED.	

REMARKS:

May 25, 1983

Florida Dept. of Environmental
Regulation
P.O. Box 3858
West Palm Beach, Florida 33402

Attn: Mr. Charles Ouseph

Mr. Ouseph,

Pursuant to our discussion of May 25, 1983, I have enclosed the Department of Transportation exemption certificate for the spill control containers we have on order. It is important to note that we will not have bottom drains built into any of these containers. When these spill control containers are delivered and installed, I will notify your office so that an inspection can be made.

If you have any questions, do not hesitate to call on me.

Sincerely,

James E. Bock
District Sales Manager

JEB/kdh
enclosures
cc: Don McCombs

RECEIVED
MAY 27 1983
Dept. of Environmental Reg.
West Palm Beach

RECEIVED
MAY 27 1983
Dept. of Environmental Reg.
West Palm Beach

U.S. Department of Transportation
Research and Special Programs Administration

400 Seventh Street, S.W.
Washington, D.C. 20590

DOT-E 8839
(FIRST REVISION)

1. Poly Cal Plastics, Inc., French Camp, California, is hereby granted an exemption from those provisions of this Department's Hazardous Materials Regulations specified in paragraph 5 below to manufacture, mark, and sell the packaging described in paragraph 7 below for use in the transportation of the corrosive liquids and oxidizer described in paragraph 3 below in commerce subject to the requirements specified herein. This exemption authorizes the use of non-DOT specification rotationally molded, cross-linked polyethylene portable tanks for the shipment of corrosive liquids and an oxidizer, and provides no relief from any regulation other than as specifically stated. Each of the following is granted the status of a party to this exemption:

Poly Processing Company, Inc., Monroe, Louisiana - PTE-1.

2. BASIS. This exemption is based on Poly Cal Plastics, Incorporated's application dated April 24, 1982, and supplemental information dated October 27, 1982, submitted in accordance with 107.103 and the public proceeding thereon. The granting of party status is based on the following application submitted in accordance with 49 CFR 107.111 and the public proceeding thereon:

Poly Processing Company, Incorporated's application dated April 24, 1982.

3. HAZARDOUS MATERIALS (Descriptor and class). Corrosive liquids for which DOT-34 reusable polyethylene container is prescribed in 49 CFR 173, and which have no secondary hazards and a vapor pressure of no greater than 14.7 psia at 130°F., classed as corrosive material; hydrogen peroxide solution in water containing 52 percent or less hydrogen peroxide by weight, classed as oxidizer.

4. PROPER SHIPPING NAME (49 CFR 172.101). Specific chemical name or generic description, as appropriate.

5. REGULATION AFFECTED. 49 CFR Part 173, Subpart F; 173.266; 178.19.

6. MODES OF TRANSPORTATION AUTHORIZED. Motor vehicle, rail freight, and cargo vessel.

7. SAFETY CONTROL MEASURES.

a. Packagings prescribed are non-DOT specification rotationally molded polyethylene portable tanks of nominal capacities between 200 and 630 gallons, as shown in applicant's Drawings included in Exhibit B of application and other drawings on file with the Office of Hazardous Materials Regulation (OHMR). Each portable tank must be made from high density, cross-linkable polyethylene which has been specifically identified and acceptable to the OHMR and be in compliance with the provisions of 49 CFR 178.19-2, 178.19-6 and 178.19-7(a)(3), except as follows:

i. 178.19-2(a)

- Does not apply. Instead, manufacturer shall carry out the following tests of materials properties on specimens cut from finished portable tanks produced by their process and meeting the requirements of this exemption:

- The swelling ratio of the polyethylene, as determined by Method C of ASTM Test D-2765-68, "Test for Degree of Cross-linked Ethylene Plastics as Determined by Solvent Extraction;"

- The density of the polyethylene, as determined by ASTM Test D-1515-68, or any acceptable equivalent test method.

The manufacturer shall also retain a number of samples cut from portable tanks meeting the requirements of this exemption, in the form of squares of material at least six inches by six inches. (Total mass of all samples to be equal to at least two kilograms.)

Such samples and records of data pertaining to their materials properties must be maintained in current status, at each producing plant, for a period of five years.

ii. 178.19-6(a)

- Does not apply. Instead, each portable tank must be permanently marked by embossment or with a metal certification plate permanently affixed to each tank. The markings must be in letter and number at least 1/4-inch high located on the side of the tank. The markings shall be understood to certify that the portable tank complies with all requirements of this exemption and must contain at least the following information:

DOT-E 8839 portable tank
Tank manufacturer_____
Test pressure 15 psig.
Serial number_____
Date of manufacture (month and year)
Tare weight_____lbs.
Rated gross weight_____lbs.
Capacity_____U.S. gal.
Do Not Stack
Do Not Place Other Freight On Top of This Tank

iii. 178.19-7(a)(3) - Changed to read: Each portable tank shall be tested by retaining for 5 minutes, hydrostatic pressure of at least 15 psig at equilibrium without leakage or pressure drop.

b. Each tank must be fitted with a pressure relief device that will limit the pressure in the tanks to 15 psig and is in accordance with 49 CFR 178.253-4 except as follows:

(i) 178.253-4(c)(1)

- The pressure relief device must open at not less than 10 psig and not over 15 psig.

- The minimum venting capacity for pressure activated vents must be 6,000 SCFH at not more than 15 pounds per square inch gage.

(ii) 178.253-4(c)(3)

- The fusible device must function at a temperature no greater than 250°F and at no greater than the tank test pressure 15 psig.

(iii) 178.253-4(a)

- Frangible devices are not authorized.

c. Portable tanks must be capable of satisfactorily withstanding the drop test and hydrostatic pressure test prescribed in 49 CFR 178.19-7(a) and the vibration test prescribed in 49 CFR 178.253-5(a)(1).

d. The minimum thickness of the portable tank, measured at any point on the container, is 0.26-inch. Other details of the shipping container must be as depicted in Drawings included in petitioner's application as Exhibit B and other drawings on file with the OHMR.

e. Additionally, portable tank must possess the chemical and physical properties as reported to the OHMR by enclosures to petitioner's application dated April 24, 1982, and letter dated June 22, 1982.

f. Any changes in design, resin, or process methods must be approved by the OHMR.

g. Reuse of any portable tank must be in accordance with the applicable requirements of 49 CFR 173.28 and 173.32(f) as modified herein. Each portable tank must be hydrostatically retested in accordance with 49 CFR 173.32(f) as applicable to DOT Spec. 57 tanks, at a test pressure of 15 psig for 5 minutes without a drop in pressure or leakage. Any tank that fails must be rejected and may not be used again for the transportation of hazardous materials. The date of the most recent periodic retest must be marked on the tank near the tank identification markings required in 7, a, ii of this exemption. The owner of the tank or his authorized agent must retain a written record indicating the date and results of all required test and the name and address of the tester, until the next retest has been satisfactorily completed and recorded.

h. Portable tanks having any portion of their molded polyethylene body or components that are repaired are not authorized.

i. Commodities must be compatible with the polyethylene (PE) portable tank, and must not permeate the PE to an extent that a hazardous condition could be caused during transportation and handling.

j. Portable tanks for hydrogen peroxide must have a vented closure to prevent accumulation of internal pressure.

k. Any fitting used must be protected in accordance with 49 CFR 178.253-3.

l. The sides of each portable tank must be marked "KEEP THIS END UP" in two places, 180° apart, with an arrow pointing to the tank top.

8. SPECIAL PROVISIONS.

a. Shippers may use the packaging covered by this exemption pursuant to 49 CFR 173.22a.

b. Each portable tank must be plainly marked on both sides near the middle, in letters at least two inches high on a contrasting background, "DOT-E 8839", "Do Not Place Other Freight On Top Of This Tank.

c. A copy of this exemption must be carried aboard each vessel used to transport packages covered by this exemption.

9. REPORTING REQUIREMENTS. Any incident involving loss of contents of the package must be reported to the OHMR as soon as practicable.

10. EXPIRATION DATE. July 30, 1984.

Issued at Washington, D.C.:

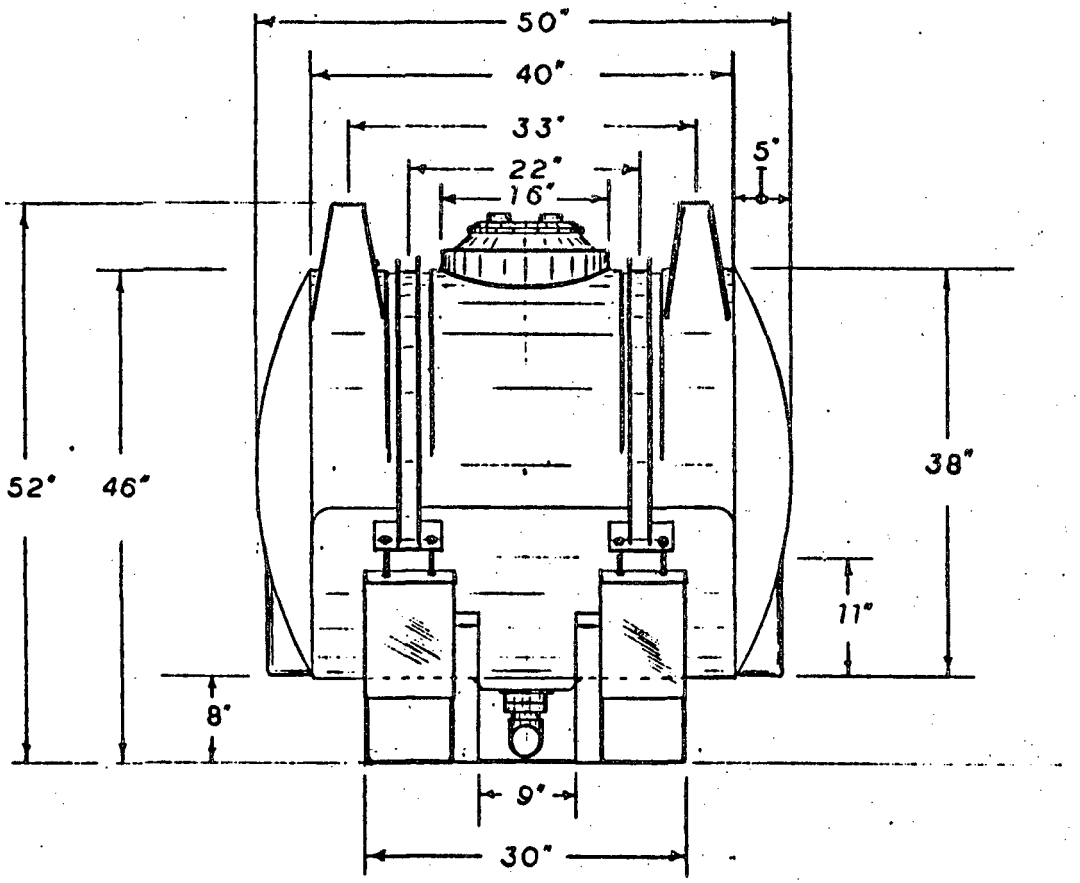
MAR 10 1983

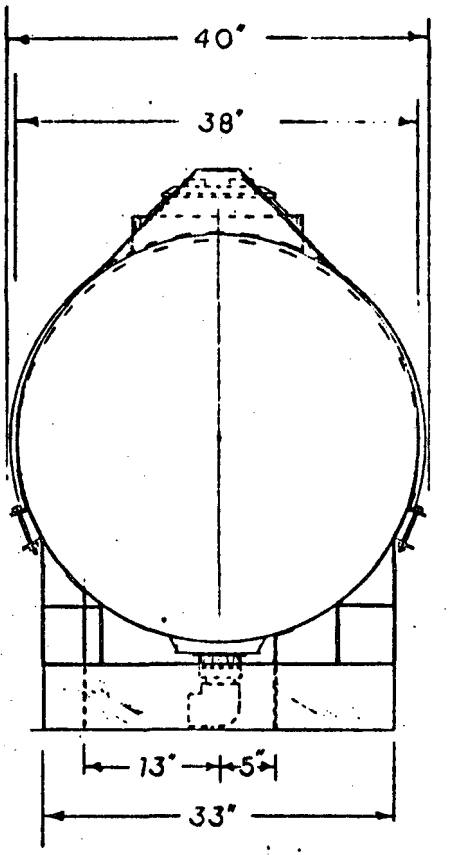
(DATE)

Alan I. Roberts
Associate Director for
Hazardous Materials Regulation
Materials Transportation Bureau

Address all inquiries to: Associate Director for Hazardous Materials Regulation, Materials Transportation Bureau, Research and Special Programs Administration, U.S. Department of Transportation, Washington, D.C. 20590. Attention: Exemptions Branch.

Dist: FHWA, FRA, USCG





SPECIFICATIONS

TANK CAPACITY	200 GALLONS - NOM.
TANK WEIGHT	75 LBS.
TOTAL WEIGHT	235 LBS.
TANK DIAMETER	38 INCHES
FITTING SIZE	2" NPT. MAX
FITTING LOCATION	CENTER SUMP
FILL OPENING	6 INCH
SADDLE ASSEMBLY	EXTRA HEAVY DUTY

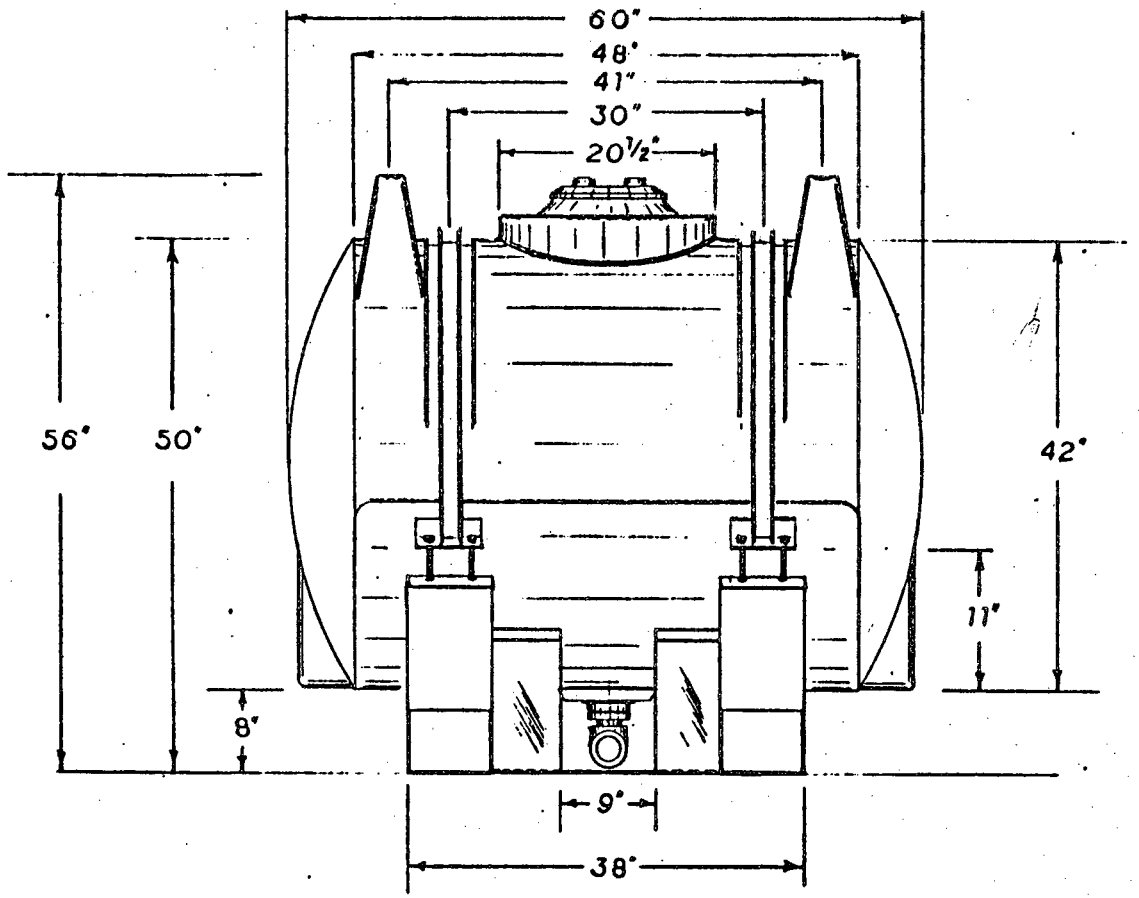
200 GALLON HORIZ TANK

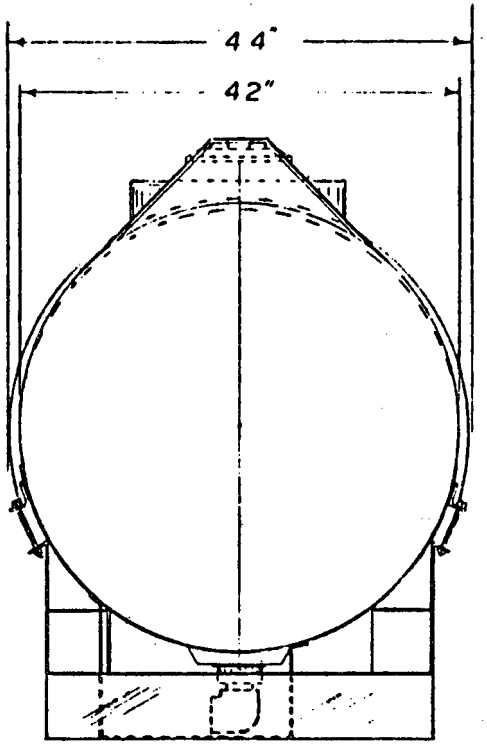
SCALE: 1 = - APPROVED BY DRAWN BY

DATE: 10-26-

DESIGN CRITERIA BY DOT E-8839

REV B DRAWING NUMBER C101382





SPECIFICATIONS

TANK CAPACITY	320 GALLONS NOM
TANK WEIGHT	90 LBS.
TOTAL WEIGHT	300 LBS.
TANK DIAMETER	42 INCHES
FITTING SIZE	2" NPT MAX.
FITTING LOCATION	CENTER SUMP
FILL OPENING	6 INCHES
SADDLE ASSEMBLY	EXTRA HEAVY DUTY

320 GALLON HORIZ TANK

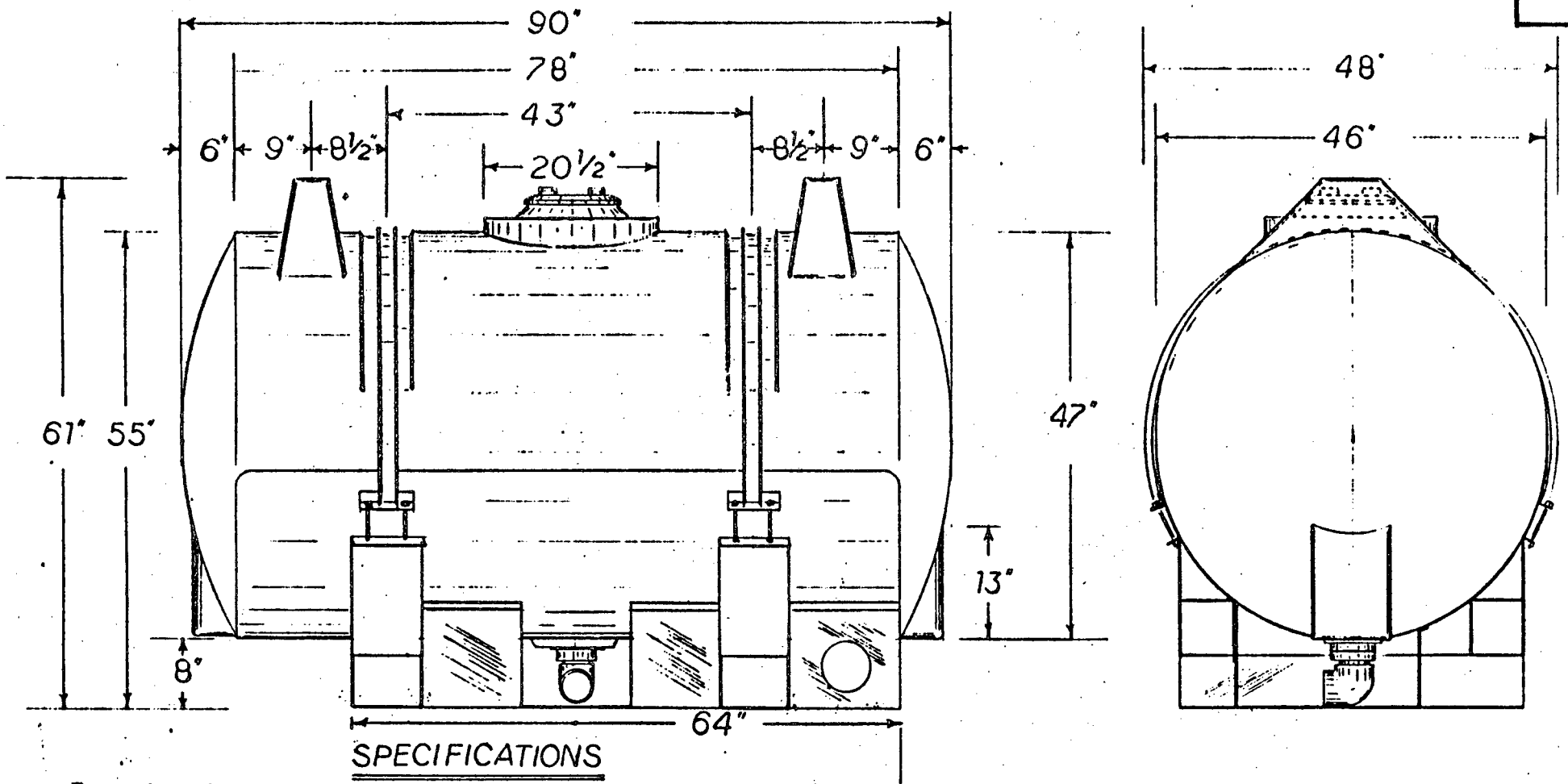
SCALE: 1" = 1'-0" | APPROVED BY | DRAWN BY jfrost

DATE: 10-26-82

DESIGN CRITERIA BY DOT E-8839

REV. B | DRAWING NUMBER PPC10682

DIETZGEN MASTER FORM 198MF



SPECIFICATIONS

TANK CAPACITY	610 GALLONS-NOM.
TANK WEIGHT	190 LBS
TOTAL WEIGHT	650 LBS.
TANK DIAMETER	46 IN
FITTING SIZE	3" NPT. MAX.
FITTING LOCATION	END OR CENTER SUMPS OPTIONAL
FILL OPENING	6 IN.
SADDLE ASSEMBLY	EXTRA HEAVY DUTY

610 GALLON HORIZ. TANK

SCALE: 1" = 1'-0"	APPROVED BY	DRAWN BY jfrost
DATE: 10-21-82		

DESIGN CRITERIA BY D.O.T. E-8839

REV. A.

DRAWING NUMBER PPC1021821

DIETZGEN MASTER FORM 188MF