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SEP 04 2003

Solid Waste Section

**Care Environmental Corp.  
HHW Processing and Transfer Facility**

**State of Florida  
Department of Environmental Protection  
Waste Processing Facility Permit**

**August 2003**

Prepared for  
Care Environmental Corp.

Prepared by



482 S. Keller Road  
Orlando, FL 32810

**RECEIVED**

**AUG 27 2003**

**Central Dist. - DEP**



*An employee-owned company*

August 27, 2003

Mr. James N. Bradner, P.E.  
FDEP  
3319 Maguire Blvd., Suite 232  
Orlando, FL 32803-3767

**Re: Care Environmental Corporation  
Waste Processing Permit Application  
HHW Processing and Transfer Facility**

Dear Mr. Bradner:

Attached please find four copies of the above referenced permit application that PBS&J has prepared in behalf of Care Environmental Corporation. Also enclosed is the \$2,000.00 permit application fee as required under Chapter 62-701.315.

We look forward to your favorable review of this application. Should you have any questions or comments regarding this matter please do not hesitate to call me at the number below.

Sincerely,

A handwritten signature in cursive script that reads 'David E. Deans'.

David E. Deans, P.E., DEE  
Vice President

c: F. McKenna, CEC  
J. Grusauskas, Volusia County

U:\OldG\WASTEMAN\Care Environmental Corp\Permit\Jim Bradner.doc  
Last Revised 8/27/2003 11:52 AM

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## 1.0 Application Form

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The following is the completed application form for a waste processing facility in accordance with Chapter 62-701.710.



Florida Department of Environmental Protection  
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

|  |
|--|
| DEP Form # 62-701.900(4)                               |
| Form Title <u>Application to Construct, Operate or</u> |
| <u>Modify a Waste Processing Facility</u>              |
| Effective Date <u>05-27-01</u>                         |
| DEP Application No. _____                              |
| (Filled by DEP)  |

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

APPLICATION FOR PERMIT TO CONSTRUCT, OPERATE  
OR MODIFY A WASTE PROCESSING FACILITY

**GENERAL REQUIREMENT:** Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes, (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A minimum of four copies of the application shall be submitted to the Department District Office having jurisdiction over the facility. The appropriate fee in accordance with Rule 62-701.315(4), F.A.C., shall be submitted with the application by check made payable to the Department of Environmental Protection (DEP). Complete appropriate sections for the type of facility for which application is made and include all additional information, drawings, and reports necessary to evaluate the facility.

Please Type or Print in Ink

A. GENERAL INFORMATION

1. Type of facility (check all that apply):

☒ Transfer Station

☐ Materials Recovery Facility:

☐ C&D Recycling

☐ Class III MRF

☐ MSW MRF

☐ Other Describe: \_\_\_\_\_

☐ Volume Reduction Facility

☐ Pulverizer/Shredder

☐ Compactor/Baling

☐ Other Describe: \_\_\_\_\_

NOTE: C&D Disposal facilities that also recycle C&D, shall apply on DEP FORM 62-701.900(6), F.A.C.

2. Type of application:

☒ Construction/Operation

☐ Operation Without Additional Construction

3. Classification of application:

☐ New

☐ Substantial Modification

☐ Renewal

☐ Intermediate Modification

☒ Minor Modification

4. Facility name: Care Environmental Corp. HHW Processing and Transfer Facility

5. DEP ID number: S064-0078767-016 County: Volusia

6. Facility location (main entrance): 1990 Tomoka Farms Road  
Daytona Beach, Florida 32114

7. Location coordinates:

Section: 9 Township: 16S Range: 32E

UTMs: Zone \_\_\_\_\_ km E \_\_\_\_\_ km N

Latitude: 29 ° 07 ' 50 " Longitude: 81 ° 06 ' 02 "

Northwest District  
160 Governmental Center  
Pensacola, FL 32501-5794  
850-595-8360

Northeast District  
7825 Baymeadows Way, Ste. B200  
Jacksonville, FL 32256-7590  
904-448-4300

Central District  
3319 Maguire Blvd., Ste. 232  
Orlando, FL 32803-3767  
407-894-7555

Southwest District  
3804 Coconut Palm Dr.  
Tampa, FL 33619  
813-744-6100

South District  
2295 Victoria Ave., Ste. 364  
Fort Myers, FL 33901-3881  
941-332-6975

Southeast District  
400 North Congress Ave.  
West Palm Beach, FL 33401  
561-681-6600

8. Applicant name (operating authority): Care Environmental Corp.  
Mailing address: 10 Orben Drive, Landing, NJ 07850  
Street or P.O. Box City State Zip  
Contact person: Francis J. McKenna, Jr. Telephone: (973) 398-5100  
Title: President frank@careenv.com  
E-Mail address (if available)
9. Authorized agent/Consultant: PBS&J  
Mailing address: 482 S. Keller Road, Orlando, Florida 32810  
Street or P.O. Box City State Zip  
Contact person: David E. Deans, P.E., DEE Telephone: (407) 647-7275  
Title: Vice President dedeans@pbsj.com  
E-Mail address (if available)
10. Landowner (if different than applicant): Volusia County Utilities  
Mailing address: 1990 Tomoka Farms Road, Daytona Beach, Florida 32114  
Street or P.O. Box City State Zip  
Contact person: Josef F. Grusauskas Telephone: (386) 257-6021  
jgrusauskas@co.volusia.fl.us  
E-Mail address (if available)
11. Cities, towns and areas to be served: Southeast US
12. Date site will be ready to be inspected for completion: December 1, 2003
13. Estimated costs:  
Total Construction: \$ 68,600 Closing Costs: \$ 207,285
14. Anticipated construction starting and completion dates:  
From: October 1, 2003 To: December 1, 2003
15. Expected volume of waste to be received: -- yds<sup>3</sup>/day 100 tons/day
16. Provide a brief description of the operations planned for this facility: Care Environmental (Care) shall operate a combined Household Hazardous waste processing and transfer facility at the Volusia County Landfill. Care also operates as a universal waste handler and a waste oil transporter/collection center at this location.

**B. ADDITIONAL INFORMATION**

Please attach the following reports or documentation as required.

1. Provide a description of the solid waste that is proposed to be collected, stored, processed or disposed of by the facility, a projection of those waste types and quantities expected in future years, and the assumptions used to make the projections (Rule 62-701.710(2)(a), F.A.C.).
2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site and wells serving community water supplies on or within 1000 feet of the site (Rule 62-701.710(2)(b), F.A.C.).
3. Provide a description of the operation and functions of all processing equipment that will be used, with design criteria and expected performance. The description shall show the flow of solid waste and associated operations in detail, and shall include (Rule 62-701.710(2)(c), F.A.C.):
  - a. Regular facility operations as they are expected to occur;
  - b. Procedures for start up operations, and scheduled and unscheduled shut down operations; and
  - c. Potential safety hazards and control methods, including fire detection and control.
4. Provide a description of the design requirements for the facility which demonstrate how the applicant will comply with Rule 62-701.710(3), F.A.C.
5. Provide a description of the loading, unloading, storage and processing areas (Rule 62-701.710(2)(d), F.A.C.).
6. Provide the identification and capacity of any on-site storage areas for recyclable materials, non-processable wastes, unauthorized wastes, and residues (Rule 62-701.710(2)(e), F.A.C.).
7. Provide a plan for disposal of unmarketable recyclable materials and residue, and for waste handling capability in the event of breakdowns in the operations or equipment (Rule 62-701.710(2)(f), F.A.C.).
8. Provide a boundary survey, legal description, and topographic survey of the property (Rule 62-701.710(2)(g), F.A.C.).
9. Provide an operation plan which describes how the applicant will comply with Rule 62-701.710(4), F.A.C. (Rule 62-701.710(2)(h), F.A.C.).
10. Provide a closure plan which describes generally how the applicant will comply with Rule 62-701.710(6), F.A.C. (Rule 62-701.710(2)(i), F.A.C.).
11. Unless exempted by Rule 62-701.710(10)(a), F.A.C., provide the financial assurance documentation required by Rule 62-701.710(7), F.A.C. (Rule 62-701.710(2)(j), F.A.C.).
12. Provide documentation to show that stormwater will be controlled according to the requirements of Rule 62-701.710(8), F.A.C.
13. Provide documentation to show that the applicant will comply with the recordkeeping requirements of Rule 62-701.710(9), F.A.C.



C. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

1. Applicant:

The undersigned applicant or authorized representative of Care Environmental Corp.

\_\_\_\_\_ is aware that statements made in this form and attached information are an application for a Construction/Operation Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility.

~~Signature of Applicant or Agent~~

Francis J. McKenna, Jr.

Name and Title (please type)

frank@careenv.com  
E-Mail address (if available)

10 Orben Drive

Mailing Address

Landing, NJ 07850

City, State, Zip Code

(973) 398-5100

Telephone Number

Date:

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, Florida Statutes):

This is to certify that the engineering features of this waste processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.

Sigurdur

David E. Deans, P.E., DEE

Name and Title (please type)

31095  
Florida Registration Number  
(please affix seal)

482 S. Keller Road

Mailing Address

Orlando, FL 32810

City, State, Zip Code

dedeans@pbsj.com

E-Mail address (if available)

(407) 647-7275

Telephone Number

Date:

## 2.0 Additional Information

---

### 2.1 Introduction

Care Environmental Corporation (CEC) will assume contract operations of Volusia County's Household Hazardous Waste program at the Tomoka Farms Road Landfill and will expand the operation of the HHW Processing and Transfer Facility to include HHW collected from communities throughout the United States. HHW will be trucked into the facility, combined with HHW collected locally and bulked for shipment to appropriate treatment, recycling or disposal facilities.

#### Household Hazardous Waste Collection for Volusia County

Care will accept deliveries from county residents in much the same manner as the county currently operates the facility. Care will also continue to offer the paint swap/reuse program currently offered by the county. This continuation of existing services as previously performed will prevent any confusion or dissatisfaction with the service as currently performed. The change in operator will essentially be unnoticed by the patrons of the facility. Care currently accepts HHW collected by counties, and is totally familiar with the quantities and types of HHW generated in Volusia County. Care's actual operation of the facility can only improve an excellent existing program by eliminating the "middleman" and reduce handling. Processing HHW on-site will not in any way result in a detrimental effect on the existing program. Quite the contrary will occur. Care HHW specialist will be on-site to answer questions and recommend alternatives. Care will provide additional educational materials for county residents as part of the program to be operated for the county.

Care's operation will not adversely impact the environment. Having Care's experience staff on-site will reduce the risk of environmental harm by providing expert evaluation, packaging, transportation and processing of HHW from the point of collection thru final disposal. Care's program for the handicapped and elderly will reduce the risk of environmental damage in the county by removing materials from possible haphazard storage in garages and homes, to a properly segregated, packaged and secondarily contained storage facility operated by professionals in the hazardous material field.

Final disposal options for Volusia County HHW will remain the same as those offered to all Care customers. As much material as possible will be recycled or it will be disposed of in such a fashion so as to minimize the risk of environmental harm and prevent future liability to Care and the County. Ignitable shall be bulked and reused as fuel, waste oil will be recycled, antifreeze will be recycled, corrosives shall be bulked and treated off-site via neutralization, and oxidizers shall be chemically reduced off-site. Materials which are not treatable so as to destroy them as described above, shall be incinerated.

All HHW received by Care shall be handled as if such wastes were hazardous wastes. Materials received from other locales shall be manifested into the facility and all off-site shipments shall be manifested as if they were a hazardous waste generated by industry or businesses. 40 CFR exempts HHW from regulation as a hazardous waste. It has always been and will continue to be

Care's policy to handle, transport and process these exempt waste in a fashion similar to RCRA regulated wastes.

Following is the information requested for an application to construct/operate a waste processing facility in accordance with Chapter 62-701.710. Since HHW is exempt from hazardous waste rules, the provisions of Chapter 62-730 do not apply to this operation.

**2.1.1 Provide a description of the solid waste that is proposed to be collected, stored, processed or disposed of by the facility, a projection of those waste types and quantities expected in future years and the assumptions used to make the projections (Rule 62-701.710 (2) (a), F.A.C.).**

The solid waste that is proposed to be collected, stored, processed or disposed of by the facility includes household hazardous waste, waste oil and lamps, devices and other universal wastes. The expected volume of waste to be received is approximately 100 tons/day. The waste expected in future years is estimated to increase by 1%-2% per year.

**2.1.2 Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site and wells serving community water supplies on or within 1000 feet of the site (Rule 62-701.710 (2) (b), F.A.C.).**

See Figure 1.

**2.1.3 Provide a description of the operation and functions of all processing equipment that will be used, with design criteria and expected performance. The description include (Rule 62-710.710 (2) (c), F.A.C.):**

- a. Regular facility operations as they are expected to occur**
- b. Procedures for start up operations, and scheduled and unscheduled shut down operations**
- c. Potential safety hazards and control methods, including fire detection and control**

Refer to the Operations Plan, Section 3.2, Maintenance and Operation, for the description of the operation and functions of all processing equipment that will be used, with design criteria and expected performance.

- 2.1.4 Provide a description of the design requirements for the facility which demonstrate how the applicant will comply with Rule 62-701.710 (3), F.A.C.**

Refer to the Operations Plan, Section 3.1, Facility Design, for the design requirements for the facility which demonstrates how the applicant will comply with Rule 62-701.730 (3).

- 2.1.5 Provide a description of the loading, unloading, storage and processing areas (Rule 62-701.710 (2) (d), F.A.C.).**

Refer to the Operations Plan, Section 3.2, Maintenance and Operation, for a description of the loading, unloading, storage and processing areas.

- 2.1.6 Provide the identification and capacity of any on-site storage areas for recyclable materials, non-processable wastes, unauthorized wastes, and residues (Rule 62-701.710 (2) (e), F.A.C.).**

N/A

- 2.1.7 Provide a plan for disposal of unmarketable recyclable materials and residue, and for waste handling capability in the event of breakdowns in the operations or equipment (Rule 62-701.710 (2) (f), F.A.C.).**

Refer to Section 3.3, Contingency Plan of the Operations Plan for a plan for disposal of residue and for waste handling capability in the event of breakdowns in the operations or equipment.

- 2.1.8 Provide a boundary survey, legal description, and topographic survey of the property (Rule 62-701.710 (2) (g), F.A.C.).**

Refer to Figure 1 for the topographic survey of the project area. The legal description will be contained in the lease agreement under development with Volusia County and will be submitted prior to the permit for this facility being issued.

- 2.1.9 Provide an operation plan which describes how the applicant will comply with Rule 62-701.710 (4), F.A.C. (Rule 62-701.710 (2) (h), F.A.C.).**

The information which describes how the applicant will comply with Rule 62-701.710(4) is as follows.

a(1). Refer to Section 3, Operations Manual describing the facility operations, persons responsible for operations and types of equipment to be used.

a(2). Refer to Section 2.2, General Inspections, for the plan to inspect the wastes received by the facility.

a(3). Refer to Section 3.3, Contingency Plan, for the procedures to cover operational interruptions and emergencies such as fires, explosions or natural disasters.

b. No putrescible wastes will be processed at the site. All drain conveyances shall be kept clean so flow is not impeded.

c. Refer to Section 2.3, Training, which discusses training of the facility staff.

d. Since the facility does not process putrescible wastes, there should be no concerns with objectionable odors.

e. Refer to Section 3.3.10, Fire Protection and Emergencies, which describes the fire protection at the facility.

f. The facility shall be controlled during the active life of the facility by fencing to prevent disposal of unauthorized solid waste.

**2.1.10 Provide a closure plan which described generally how the applicant will comply with Rule 62-701.710 (6), F.A.C. (Rule 62-701.710 (2) (l), F.A.C.).**

Refer to Section 4, Closure Plan which describes generally how the applicant will comply with Rule 62-701.710(6).

**2.1.11 Unless exempted by Rule 62-701.710 (10) (a), F.A.C., provide the financial assurance documentation required by Rule 62-701.710 (7), F.A.C., (Rule 62-701.710 (7), F.A.C., (Rule 62-701.710 (2) (j), F.A.C.).**

The closing cost estimate is included in Section 4.6 of the Closure Plan. CEC's lease agreement with Volusia County includes a requirement for CEC to provide the County with financial assurance for closure costs in accordance with Chapter 62-701.710(7). CEC is requesting that in accordance with (c) of that same section, the Department establish a cooperative mechanism with the County to avoid duplicative financial requirements.

**2.1.12 Provide documentation to show that stormwater will be controlled according to the requirements of Rule 62-701.710 (8), F.A.C.**

The existing stormwater management system for this facility will be modified to provide total containment of the 25-year/24-hour storm on the paved truck yard. Manually operated pumps

will pump water into the stormwater management system on a daily basis after inspection by facility staff to assure the water has not been contaminated.

### **2.1.13 Provide documentation to show that the applicant will comply with the record keeping requirements of Rule 62-701.710 (9), F.A.C.**

Operational records shall be maintained to include a daily log of the quantity of solid waste received, processed, stored and transported from the site. The records shall include type of waste, residuals, and any unacceptable waste. The records shall be compiled on a monthly basis and shall be available for inspection by the Department. Records shall be retained at the facility for three years.

## **2.2 Inspections**

CEC will inspect the transfer facility for malfunctions and deterioration, operator errors and discharges which may be causing or may lead to:

- Release of hazardous waste constituents to the environment or
- Pose a threat to human health

A written schedule for inspecting monitoring equipment, safety and emergency equipment, security equipment, and operating and structural equipment has been prepared and is included as Section 2.2.1. This schedule shall be kept at the facility as well as the records of the inspections resulting from this schedule will be kept until facility closure.

The schedule of inspections specifies the types of problems to be looked for during the inspection such as cracked or leaking curbs, dikes, or other spill control devices, operational communications system, sufficient inventories of emergency supplies such as sorbents and neutralizing agents, functional fire extinguishers, and sufficient inventory of safety equipment such as respirators, gloves, and protective suits.

Unloading or loading areas shall be inspected daily. Other items are inspected weekly or monthly depending on the probability of deterioration or the probability of an environmental or human health incident if the deterioration, malfunction or operator error goes undetected between inspections.

CEC shall remedy any deterioration or malfunction which the inspection reveals in an appropriate time schedule which ensures that the problem detected does not lead to an environmental or human health hazard. When such hazard is deemed to be imminent or has already occurred, remedial action will be immediate.

### 2.2.1 Inspection Schedule

Container storage areas, including trailer parking areas shall be inspected daily for leaks, deterioration caused by corrosion, damage, or other factors. This inspection shall be performed and documented using the attached inspection form. In addition to looking for leaks, the container storage area will be inspected to ensure operation of the facility with other sections of this operations plan. Items will include status of secondary containment, open containers, stacking, and aisle space.

Secondary containment shall be inspected to ensure that no leaks or spills have occurred which require removal and cleanup, absence of gaps or cracks which could allow for release of hazardous waste or hazardous waste constituents to soil or water, on- or off-site.

The storage areas shall be inspected for the following types of potential problems:

- Stacking in accordance with Section 3.2.2 of Operations Plan (aisle space, leaning pallets, liquids two high, 85-gallon at ground level, closed containers, corroded containers, leaking containers)
- Communications equipment shall be observed to ensure that it is in place and appears to be undamaged
- Unloading/Loading areas shall be inspected for signs of leakage or spills and remediated immediately
- **Monthly inspections** shall include the following:
  - Portable fire extinguishers are in place and charged
  - Test communications devices (evac horns and intercom/phone)
  - Sufficient supply of emergency equipment and supplies in accordance with section 3.5
- **Annual inspections** of fire suppression system and equipment shall be performed by a certified contractor and documented using their report form.

### 2.3 Training

Facility personnel will successfully complete classroom instruction and on-the-job training within 6 months after the date of their employment or to a new assignment within the facility. This training will be directed by a person trained in hazardous waste management procedures and will teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions. This training is designed to ensure that facility personnel are able to respond to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems. The following will also be included in the training as relevant to each position:

Procedures for inspecting, repairing and replacing emergency and monitoring equipment

- Communications and/or alarm systems
- Response to fires or explosions
- Response to groundwater or surface water contamination incidents
- Shutdown of operations
- Return to operation after incident
- PPE selection
- Respirator training
- Decontamination procedures
- Manifest system
- Aisle space requirements
- Fire extinguisher use and limitations
- RCRA history, hazardous waste determination, LDR requirements
- Basic chemistry terminology and physical characteristics of chemical families
- Bulking/Consolidation/Compatibility of HHW
- Universal Waste Handling
- Waste Oil Training (Definitions, Prohibitions, Reporting)

In addition to the initial training, employees will receive annual refresher training. Documents certifying all training will be maintained on-site for all current facility operators.



**Care Environmental Daily Inspection Record**

Day: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

By: \_\_\_\_\_

**Loading Unloading areas**

Signs of Leakage/Spills \_\_\_Y\_\_\_N

Surfaces in Good Repair \_\_\_Y\_\_\_N

Containment Intact \_\_\_Y\_\_\_N

Actions Taken if required: \_\_\_\_\_

**Storage Areas**

Signs of spills or leaks \_\_\_Y\_\_\_N      Sufficient aisle space \_\_\_Y\_\_\_N

Leaking Containers \_\_\_Y\_\_\_N      Leaning Pallets \_\_\_Y\_\_\_N

Open Containers \_\_\_Y\_\_\_N      Stable stacking \_\_\_Y\_\_\_N

Floor in good repair \_\_\_Y\_\_\_N      Containment intact \_\_\_Y\_\_\_N

Bulging Containers \_\_\_Y\_\_\_N      Hissing containers \_\_\_Y\_\_\_N

Unlabeled containers \_\_\_Y\_\_\_N  
Communications in place \_\_\_Y\_\_\_N      and in good condition \_\_\_Y\_\_\_N

Universal waste clearly marked or stored separately \_\_\_Y\_\_\_N

Waste oil tank in good condition \_\_\_Y\_\_\_N and Marked \_\_\_Y\_\_\_N

Actions Taken \_\_\_\_\_

## **3.0 Operations Plan**

---

### **3.1 Introduction**

The HHW Processing and Transfer Facility will receive and ship waste during the same hours of operation as the Tomoka Farms Road Landfill operated by Volusia County. All waste inbound to this facility shall be weighed at the County scale house, and recorded as HHW designated for this facility. Waste processing within the facility will occur on a schedule to include 24-hour operation, if necessary, to bulk and sort waste and package for shipping out to designated waste processors, recycling facilities or disposal facilities.

### **3.2 Facility Design**

- A. HHW delivered by private citizens will be received at a receiving table by CEC staff where the waste will be identified and characterized such that it can be placed in temporary storage for further processing, bulking and packaging for outbound shipping. The processing building is a metal frame building with a metal roof and curbed concrete floor with metal grate floor drains that discharge through a manually-operated isolation valve into an oil/water separator prior to discharge into the stormwater system for the site. CEC will add fencing and opaque screening from floor level to 10-feet above the floor to shield the bulking and processing operations from the general public. Adequate natural ventilation is provided between the top of the fence and the roof such that no additional ventilation system will be required. Table 3-1 is an estimate of the cost for all site improvements to meet these design requirements.
- B. The floor drain system will be modified to install a manually operated valve between the building and the oil/water separator. This valve will be maintained in its normally closed position. Floor drains will be inspected and drained daily upon confirmation by CEC staff that the water in the floor drains is not contaminated and does not contain an oily sheen on its surface. Should there be a concern that the water is unsuitable for discharge to the stormwater system, the nature of the concern will be determined and the water will be pumped out for appropriate disposal.
- C. All HHW received at this facility will be weighed at the County scale house and recorded. Waste shipped in from outside the County will be stored in their transport trailers until off loaded, processed, bulked and reloaded for shipping off site.

### **3.3 Maintenance and Operation**

CEC staff shall maintain and operate the HHW processing and transfer facility in such a manner as to minimize the possibility of fire, explosion, unplanned sudden or non-sudden release of hazardous wastes or hazardous constituents to air, soil, surface or surface water, which could threaten human health or the environment.

Table 3-1

**ENGINEER'S COST ESTIMATES**

| ITEM NO. | QTY                      | UNIT | ITEM DESCRIPTION                             | UNIT PRICE | TOTAL              |
|----------|--------------------------|------|--|------------|--------------------|
| 1        | 1                        | LS   | MOBILIZATION, BONDS, PERMITS AND INSURANCE   | \$1,000.00 | \$1,000.00         |
| 2        | 100                      | LF   | 2-INCH PVC PIPE, OPEN CUT INSTALLATION       | \$8.00     | \$800.00           |
| 3        | 2                        | EA   | PUMP & SUMP WITH COVER                       | \$3,500.00 | \$7,000.00         |
| 4        | 1,140                    | LF   | PERIMETER SECURITY FENCE AND GATES           | \$18.00    | \$20,520.00        |
| 5        | 3                        | EA   | PERIMETER SECURITY FENCE SLIDING MANUAL GATE | \$2,500.00 | \$7,500.00         |
| 6        | 2                        | LF   | 6-INCH GATE VALVE                            | \$650.00   | \$1,300.00         |
| 7        | 1                        | LS   | CONNECTION AT MANHOLE                        | \$500.00   | 500.00             |
| 8        | 30                       | CY   | 12-INCH CONCRETE SPILL CONTAINMENT CURB      | \$200.00   | 6,000.00           |
| 9        | 100                      | LS   | RESTORATION, COMPLETE                        | \$150.00   | \$15,000.00        |
|          | <b>SUBTOTAL</b>          |      |  |            | <b>59,620.00</b>   |
|          | <b>CONTINGENCY @ 15%</b> |      |  |            | <b>8,943.00</b>    |
|          | <b>TOTAL</b>             |      |  |            | <b>\$68,563.00</b> |

CEC staff shall maintain all secondary containment structures in good repair, all hoses shall be capped or connected end-to-end when not in use, precautions shall be taken to prevent spillage during transfer of materials in accordance with, but not limited to, 40 CFR 112, all containers will be compatible with their contents, and sufficient first response materials shall be maintained on-hand to respond to any spill, leak, or fire to prevent the release or spread of hazardous wastes or constituents outside or off-site of the facility.

### 3.3.1 Waste Inspection

Waste received in transfer vehicles will be properly manifested as non-regulated waste. CEC staff will inspect each vehicle to confirm that the waste in the vehicle corresponds to the manifest. Because these vehicles are packed by professionals and all waste is manifested, unauthorized waste is not expected to be received in this manner.

At the public HHW receiving table CEC staff will identify and categorize the waste received. For those wastes delivered to the facility in this manner which are not managed by the facility, the customer will be instructed in the proper location on site for disposal, or directed back to the County scale house for further instructions.

### 3.3.2 Storage of Waste

All containers received and used by CEC for the containerization of HHW, Universal Wastes, Waste Oil, or Hazardous waste shall be DOT-approved containers and be compatible with their contents. Containers should be free of excessive rust, dents or other damage which might affect the integrity of the container, or other conditions which may cause them to rupture or leak. Containers shall be kept closed except when adding to or removing materials from the container. Any container which appears to be compromised due to damage as described above shall be overpacked or the contents transferred to a new container.

Any container received which is not in good condition (rusted, severely dented, corroded, etc.), or leaking shall be immediately overpacked, transferred to a new container, or otherwise managed to prevent it from leaking or spilling. Likewise, a container discovered during facility inspections which has deteriorated so as to possibly leak or is leaking shall be immediately overpacked, transferred to another container, or otherwise handled so as to prevent spillage of the contents.

#### A. Compatibility of Waste with Container

CEC shall only use containers which are made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain waste is not impaired. At a minimum, acids shall only be stored in plastic containers or lined steel containers. Alkaline materials may be stored in steel containers or plastic. Corrosive lab packs shall be performed in steel drums with removable liners, or fiber or plastic drums. All containers must be DOT-approved for shipment and the package must meet the

minimum packaging requirements for the material contained within (correct packaging group). See 49 CFR 172. Any container received that is not DOT-approved shall be overpacked or the contents transferred to another container.

No drum shall be reused unless the new contents are compatible with previous contents or the container has been decontaminated. For example, a container previously used to store cyanides shall not be reused to store acid wastes unless the container has been decontaminated with an alkaline solution to remove all cyanide residues.

B. Management of Containers

Containers shall not be opened, handled, or stored in any manner which may rupture the container or cause it to leak. All 55 gallon drums of liquid shall be stored on pallets no more than two high. Smaller containers may be stacked (nested) on top of each other on one pallet and stacked two pallets high. Eighty-five gallon overpack containers shall only be stored on pallets at floor level. Drums containing solids may be stacked three high. Every attempt shall be made to stack pallets of smaller containers on the top of each stack. For, example, do not store a pallet of 55-gallon drums on top of a pallet of 30-gallon drums. Fiber drums shall be stacked on top of steel drums, plastic drums or other fiber drums.

All containers shall be labeled or otherwise marked so as to identify the contents, manifest number and generator at a minimum so as to determine the date of receipt at the transfer facility. A log of such information shall be kept indicating the generator, the date of receipt, the number of containers received, the date shipped, and number of containers shipped. Universal wastes shall clearly marked or labeled to identify them as universal wastes vs. non-hazardous or hazardous wastes.

All containers shall be stored on pallets on an impervious surface (concrete). Aisles shall be painted on the floor to provide sufficient space for the unobstructed movement of personnel to inspect and to take initial action in the event of a spill to prevent the migration of material to other areas of the facility or initial fire suppression. Lines shall be painted on the floor two feet apart between rows. The rows shall accommodate 48"-wide pallets. This arrangement will ensure sufficient distance, taking into account drum overhang and the inaccuracy of the placement of the pallets on the floor. It is not intended to maintain a minimum of two feet between the drums. While initial response actions are taking place, a forklift can be used to move adjacent pallets to gain further access to take final actions necessary to control and remediate the situation.

C. Special Requirements for Ignitable or Reactive Wastes

Containers holding ignitable or reactive wastes will be located at least 50 feet from the landfill property line.

### D. Special Requirements for Incompatible Wastes

Incompatible wastes or incompatible wastes and materials will not be placed in the same container unless the provisions of 40 CFR 265.17(b) is complied with. Specifically, such packaging shall be conducted so that it does not (1) generate extreme heat or pressure, fire or explosion, or violent reaction; (2) produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion; (4) damage the structural integrity of the device or facility containing the waste; or (5) through other like means threaten human health or the environment.

Hazardous waste will not be placed in an unwashed container that previously held an incompatible waste, unless 265.17(b) is complied with.

A storage container holding hazardous waste that is incompatible with any waste or other materials nearby in other containers will be separated from the other materials or protected from them by means of a dike, berm, wall, or other device or procedure. CEC will specifically comply with this requirement by storing reactives in a separate self-contained storage unit and/or by storing materials on pallets of sufficient distance apart to prevent co-mingling.

### 3.3.3 Waste Processing

CEC will bulk HHW wastes including paints, thinners, stains, and other household ignitable wastes. Bulking shall be accomplished by pumping these materials from containers to tanker trucks for shipment offsite for reuse as a fuel. Some similar wastes may also be bulked into 55-gallon containers from smaller containers if they cannot be shredded. All drums of ignitable waste to be bulked into tankers shall be sampled and scanned for PCB's.

One of the self-contained storage units shall be used to consolidate or bulk acids and bases into separate bulk 55, 30 or 16-gallon containers. One drum will be used for each type of material, i.e., one drum for hydrochloric (muriatic) acid, one drum for sulfuric (battery) acid, one drum for ammonia solutions, one drum for phosphoric acid, etc. Only like wastes will be combined to prevent any unexpected reactions from occurring. Bottles, cans or other containers of these materials shall be opened and the contents poured into the appropriate container as described above. Any corrosive HHW which cannot be bulked or are chosen not to be bulked into larger containers shall be repacked as described below or shipped off-site as received.

Liquid herbicides and pesticides will be bulked in the self-contained storage unit used to bulk corrosives. Household herbicides and pesticides will be kept separate from universal pesticides. Bulk drums or totes of consolidated pesticides will either be shipped off-site or bulked into tankers for off-site incineration. Solid herbicides and pesticides will be repackaged into plastic-lined cubic yard boxes for shipment off-site for incineration. Cubic yard boxes will be stored inside trailers staged on the concrete impervious surface prior to shipment to prevent damage or leakage from precipitation.

Oils received from households will be poured into the existing waste oil tanks for eventual shipment off-site for processing by a Florida-registered waste oil transporter and/or processor. Only waste motor oils will be handled in this manner. Other petroleum products will be bulked with ignitable wastes for reuse as fuel.

Antifreeze will be poured out of containers received from households into 55-gallon steel drums for off-site recovery and reuse.

A. Shredding

A portable industrial shredder designed specifically to shred and bulk household ignitable materials and aerosol cans will be used to process paints, thinners, household solvents, stains, and other ignitable or combustible materials such as brake fluid, transmission fluid, etc. This shredder will be equipped with a liquid nitrogen inerting system, fire suppression system and water to prevent or limit any fires that may occur during processing. Liquids produced from the shredding process will be collected in a sump incorporated into the design and pumped using a diaphragm pump into tanker truck approved by DOT for the transport of ignitable materials. All piping and hoses are located within the secondary containment system. As a further precaution against spills and fires, the shredder, which will be located outside, adjacent to the HHW collection/storage area within secondary containment, on the northeast corner of the facility, will use an inert gas to produce an oxygen-deficient atmosphere at the point of shredding.

B. Repackaging

CEC receives various limited quantities of HHW in 5-, 10- and 20-gallon containers. These are lab packs or what DOT classifies as overpacks of similar materials of one hazard class. CEC may repackage several of these small containers into one 55-gallon container for shipment offsite. The emptied shipping containers may then be reused if not contaminated, or disposed of or recycled.

Solid herbicides and pesticides as mentioned in 5.1 above will be repackaged from their original shipping container into DOT-approved Tri-wall cubic yard boxes with capacities of at least 2000 pounds. These boxes are lined with 6 mil plastic liners. Prior to shipment the liner is closed and the box lid is taped closed. Used vermiculite packaging material shall be disposed as non-hazardous waste via landfill. If during the repackaging process it is determined that herbicide or pesticide material leaked inside the shipping container and contaminated the vermiculite, the vermiculite will be disposed of with the solid pesticides.

### 3.3.4 Waste Disposal

Final disposal options for Volusia County HHW will remain the same as those offered to all CEC customers. As much material as possible will be recycled or it will be disposed of in such a fashion so as to minimize the risk of environmental harm and

prevent future liability to CEC and the County. Ignitable waste shall be bulked and reused as fuel, waste oil will be recycled, antifreeze will be recycled, corrosives shall be bulked and treated off-site via neutralization, and oxidizers shall be chemically reduced off-site. Materials which are not treatable so as to destroy them as described above, shall be incinerated.

All HHW received by CEC shall be handled as if such wastes were hazardous wastes. Materials received from other locales shall be manifested into the facility and all off-site shipments shall be manifested as if they were a hazardous waste generated by industry or businesses. Although, 40 CFR exempts HHW from regulation as a hazardous waste. It has always been and will continue to be CEC's policy to handle, transport and process these exempt waste in a fashion similar to RCRA regulated wastes.

### **3.3.5 Discharge Prevention Systems**

#### **3.3.5.1 Truck Yard**

The truck yard for staging, loading and unloading trucks will be contained by an 12-inch high containment curb. Access into the yard will be over an entrance ramp that will prevent stormwater from draining out through the access road. Stormwater will flow to low points where manually-operated sump pumps will discharge clean stormwater into the drainage system for the site. If a spill occurs, the sump pumps will not be operated preventing or minimizing the amount of discharge or release.

#### **3.3.5.2 Processing and Consolidation Building**

The process and consolidation building also contains an 12-inch high containment curb along the entire perimeter of the building. This building is designed for truck drive-through, and an access and egress ramp is included to prevent floor drainage from discharging out these areas.

The building contains floor drains that drain to an automatic oil/water separator, and then discharges into the drainage system for the site. This system will be preserved. New valves installed in this system will be normally closed to fully contain the building floor and prevent any discharge or release. The floor drains will be inspected and the isolation valve manually opened to drain out clean water.

### **3.4 Contingency Plan**

#### **3.4.1 Introduction**

This plan describes the actions facility personnel shall take in response to any unplanned sudden or non-sudden release of waste constituents to the air, soil, surface water or ground water at the facility. This contingency plan and procedures contained herein shall be implemented by CEC response team members, their priorities being based upon the protection of human life, mitigating environmental harm, and protection of property, respectively. This plan is to be carried out in the event of fire or release involving hazardous materials. Personnel listed as EOSCs have full authority to make all necessary decisions.



EOSCs are authorized to commit necessary resources to implement this contingency plan including authority to call outside help if he/she determines the situation warrants. A coordinator shall be on call at all times.

### **3.4.2 Surface Water and Run-Off Potentials**

Based on an assessment of potential spill sources and spill migration pathways conducted during the facility audit, the potential for significant impacts to surface water is relatively low. Releases originating from the indoor systems (building floor drains) would be confined to the floor surface of the transfer station. Such a release would be through the oil/water separator, which can be manually closed.

Releases originating from any outdoor system (i.e., truck yard) would migrate from the truck yard containment area to the drainage sumps. The release could only exit this system and enter an unlined drainage swale that becomes part of the landfill drainage system addressing this area of the overall site if the manually operated sump pumps were turned on. Since visual inspection of the water quality is required prior to activating the pumps, this is an unlikely event.

Should a release occur that threatens to migrate into the landfill storm water system, surface water, or wetland area, it shall be the highest priority of the EOSCs, Care staff and any spill contractor called to respond to attempt to intercept and abate any run-offs that may be directed towards the landfill drainage system. A site plan showing the potential surface run-off directions and receptors at the site is provided as Figure 1.

### **3.4.3 Emergency Response On-Scene Coordinators (EOSCs)**

The following persons are qualified to act as emergency coordinators. Further, these persons are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. They also have the authority to commit the resources needed to carry out the contingency plan.

#### **Primary Emergency Coordinator:**

|                 |                         |
|-----------------|-------------------------|
| Name:           | Francis J. McKenna, Jr. |
| Title:          | President               |
| Business Phone: | 973-398-5100            |
| Mobile Phone:   | 973-445-1776            |

#### **Secondary Emergency Coordinator:**

|               |                    |
|---------------|--------------------|
| Name:         | Smith Toussaint    |
| Title:        | Operations Manager |
| Mobile Phone: | 407-383-3991       |

### **3.4.4 Preparedness and Prevention**

**Adequate Aisle Spacing.** All containers and materials shall be stored with enough clearance between them as to allow proper spacing for inspection purposes. All equipment shall be maintained in such a way as to allow for proper aisleway clearances to allow for the movement of emergency equipment and emergency personnel in the event an incident occurs at the facility.

**Emergency Notification.** Whenever an imminent or actual emergency is discovered by an employee, the primary EOSC must be notified immediately. In the event such a situation occurs that is immediately dangerous to human life or health, all supervisory personnel shall make the immediate notification calls until such time as the EOSC can be contacted. The EOSC shall contact the following agencies if their assistance is required:

- a. Police/Fire Department: 911
- b. Emergency Operations Center: 386-254-1500
- c. Florida DEP: (407) 894-7555
- d. EPA Region IV Administrator: (212) 637-4232
- e. EPA National Response Center: (800) 424-8802

### 3.4.5 Evacuation Plan

In the event a situation warrants, and is beyond the EOSC or CEC personnel's capabilities to manage, a facility evacuation may be necessary. The emergency on-scene coordinator shall be responsible for implementing the evacuation procedure. The emergency coordinator shall assess whether or not an incident or emergency event has occurred which would require a partial or full evacuation of the facility. If it has been determined that an emergency evacuation is required, the following steps shall be taken:

1. A warning will be given over the PA system to begin evacuation. Trucks will immediately leave. Office personnel will evacuate on the same routes upon the sounding of the alarm.
2. At the sound of the evacuation announcement, stop work and proceed to evacuate the area immediately using the nearest safe exit. When the public address system is used, the following information should be given:
  - a. the nature of the emergency
  - b. the location of the emergency
3. All employees and visitors shall leave the facility and report to the designated assembly area (parking lot). The emergency coordinator or his designee shall take roll call. If it is necessary to relocate at a greater distance from the facility, the decision for the required location shall be made by the emergency coordinator or his designee. The evacuation routes are displayed on site maps posted throughout the facility.
4. Persons designated by the emergency coordinator to be traffic controllers shall position themselves in proper areas to direct emergency vehicles to the incident located on site.
5. Persons designated by the emergency coordinator as incipient (early-stage) fire response shall report to the specific area with extinguishers from their immediate area and prepare to use or evacuate as directed.

6. Personnel designated by the emergency coordinator shall be expected to search and assure that the facility is clear and all equipment is turned off except those that are absolutely necessary.
7. Maintenance personnel shall see that electrical power in affected areas is de-energized as to remove the threat of shock.
8. Designated searchers, when needed, shall assist the designated extinguisher handlers with back-up extinguishers and shall help move material, as required, to protect from water or fire damage as much as possible.
9. The company personnel's duties shall terminate if the incident reaches levels beyond that of an incipient or early stage. Their duties shall also end upon arrival of the fire department.
10. Evacuation routes and exit assignments - Floor diagrams of the facility mounted within the building show the best routes to use when evacuating the facility.

## 3.4.6 Community Evacuation Program

The facility's location is such a distance from the general population that a major incident requiring the evacuation of the surrounding area is unlikely. If local emergency response, fire departments or regulatory agencies make decisions which otherwise counter this statement, this plan shall be amended to reflect the agency's policies.

## 3.4.7 Emergency Equipment

The central storage of equipment to be used in time of a spill event is in the main processing building. Facility emergency equipment includes, but is not limited to, the following:

| Equipment   | Location   |
|---|--|
| Shovels and rakes   | Storage shed and loading dock                                      |
| Floor dry absorbent   | Storage shed and loading dock                                      |
| Vacuum truck; min. 3000 gallon                                  |  |
| First aid kits  | In all trucks, main office, loading dock                           |
| Absorbent pads, 24"x24"x3/4"<br>(sorbent-silicate)              | Storage shed and loading dock                                      |
| Tri-reflectors, misc. safety equipment                          | On all trucks  |
| Personal protective equipment                                   | On all trucks, drivers office and storage shed                     |
| Boots   | On all trucks and storage shed                                     |
| Fire extinguishers- 10 lb. ABC                                  | 1-containment pad, 1-drivers office, 1-main office, 1-loading dock |
| Respirators and filters, APR<br>(organic vapors, acid, ammonia) | Loading dock, all trucks, storage shed                             |
| 85-gallon steel recovery drums                                  | Containment pad and all trailers                                   |
| Safety shower and eyewash                                       | Loading dock   |
| Mercury Spill Kit   | Loading dock   |

| Equipment   | Location     |
|-------------|--------------|
| Wooden plug | Loading dock |
| Plug-n-dike | Loading dock |

### 3.4.7.1 Discussion of Emergency Equipment

- a. Fire suppression equipment including fire extinguishers, etc. - Fire extinguishers are the types required for use and are compatible with the materials expected to be in use throughout the facility.
- b. Water supply - The building is equipped with a dry sprinkler system with a standpipe connection for fire department use. In the event of a fire, the fire department can connect to the standpipe and pump water through the sprinkler system.
- c. Testing and Maintenance - All fire extinguishers are inventoried monthly. Each station and extinguisher has a seal to tell if it has been used.
- d. Personal Protective Equipment - All other personal protective equipment such as safety glasses, goggles, face-shields, gloves, and chemical-resistant clothing shall be utilized as protection from exposure resulting from contact with vapors, liquids, and solids while handling the various hazardous materials. Protective gloves and eyewear are kept in the emergency response trailer. Eye wash and shower stations are located throughout the facility. All other protective equipment is available through the designated spill contractor.

### 3.4.8 Access to Communication or Alarm System

Whenever household hazardous waste is being poured, mixed, or otherwise handled, all personnel involved in the operation of pouring, mixing or otherwise handling the waste will have immediate access to an internal alarm or emergency communication device and/or access through visual or voice contact with another employee.

One employee shall never operate the facility or portion thereof alone. Therefore, the requirements of 40 CFR 265.34 (b) do not apply.

### 3.4.9 Security

CEC and Volusia County have taken steps to prevent the unknowing entry and to minimize the possibility for unauthorized entry of person or livestock onto the active portion of this transfer facility. These security measures include an artificial barrier, i.e., a fence in good repair surveillance cameras, and a means to control entry, which include locked gates and controlled roadway access.

Signs have been posted with the legend "Danger Unauthorized Personnel Keep Out" at each entrance and other locations in sufficient numbers to be seen from any approach to the transfer

facility portion of the property. These signs are posted in English and Spanish and are legible from a minimum distance of 25 feet.

### 3.4.10 Fire Protection and Emergencies

Prior to operation of the facility, Care shall notify the local police, fire departments and local emergency planning authority of the properties of wastes received and handled at the facility and associated hazards, places within the facility where employees would normally be working, entrances to the building and to roads inside the facility and evacuation routes by certified mail. This notice would also invite authorities to visit the facility and make any necessary pre-plan arrangements as they feel required.

Similar notices and agreements with local emergency response contractors and equipment suppliers shall be documented and available for inspection by DEP representatives.

Local hospitals shall be notified of the properties of the wastes received by Care and the possible injuries or illnesses that could result from fires, explosions or releases at the facility. These records shall also be maintained on-site.

If the local authorities decline to enter into such arrangements, Care shall document the refusal in the operating record. See the Contingency Plan submitted with this operations plan.

## 4.0 Closure Plan

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### 4.1 Introduction

CEC will maintain an on-site copy of the approved closure plan and all revisions to the plan until the certification of closure-completeness had been submitted to and accepted by the state of Florida DEP.

CEC will notify the state of Florida DEP, Central District, at least 180 days prior to the date we expect to commence closure.

### 4.2 Closure Procedures

CEC will, upon closure of the facility, remove all waste from site for proper disposal and clean and decommission the facility as follows:

- Remove all materials, empty drums and other supplies
- Wash down and flush all containment areas in the building and those that are open to weather
- Render containment areas open and free-flowing

Disposal or Decontamination of Equipment, Structures and Soils (40 CFR 265.114) will be addressed as follows during closure:

- A. During the course of operation of this facility any spill that may occur will be cleaned up immediately under the procedures established by the contingency plan.
- B. Soils adjacent to the containment pad will be tested for contamination with current test procedures at that time and under the direction of the DEP. In the event contamination is found, all soils will be removed and transported by CEC's trucks to an approved disposal site.

All of CEC's transfer facility activities are located within the confines of the concrete pad, so no ground/soil contamination is to be expected during transfer/storage of wastes:

- A. Any leakage/spillage of hazardous wastes/materials onto the impermeable surface would not result in any permanent contamination of that surface after spill clean up.
- B. Any accidental leakage/spillage of hazardous waste materials onto the uncovered ground (roadways, access ways) on the property during ingress and egress to the transfer facility impermeable pad would be dealt with immediately as a spill as outlined in the contingency plan. No permanent contamination would result necessitating any closure documentation.

## 4.3 Closure Certification

Upon completion of closure, CEC will submit to the state of Florida DEP, Central District, a certification by both CEC and a local independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

Certification of Closure (40 CFR 265.115). Within 60 days of completion of course, CEC will submit to the state of Florida DEP, Central District office by registered mail, a Certification that the transfer facility has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by an authorized company representative and by a local independent registered professional engineer. Documentation supporting the independent registered professional engineer's certification will be furnished upon request to the Central District's office until such time as the office releases CEC from any financial assurance requirements for closure. (40 CFR 265.143 (h))

This closure plan was designed in accordance with the Closure Performance Standard (40 CFR 265.111) to insure that the facility will not require further maintenance and controls, minimizes or eliminates threats to human health and the environment, and avoids escape of hazardous waste constituents, contaminated rainfall runoff, or waste decomposition products to the ground or surface waters or to the atmosphere.

## 4.4 Closure Schedule

The following amendment time schedule will be adhered to. CEC will submit the amended closure plan to the Central District Office.

- a. At least 60 days prior to a proposed change in the facility design/operation.
- b. No later than 60 days after an unexpected closure plan-affecting event has occurred.
- c. No later than 30 days after an unexpected closure plan-affecting event has occurred during closure.

In the event the Central District Office requests a modification of the approved closure plan, CEC will submit the modified plan:

- a. Within 60 days of the request.
- b. Within 30 days if the request is due to an unexpected event occurring during closure.

## 4.5 Closure Plan Amendment

In the event that CEC wishes to amend the approved closure plan prior to final closure of the facility, we will submit a written request to the state of Florida DEP, Central District Office.

Considerations for amending the approved closure plan include:

- a. changes in the facility size/capacity
- b. changes in the operating procedure
- c. unexpected events requiring closure plan modification
- d. unexpected events requiring closure plan modification during closure

#### **4.6 Closure Cost Estimate**

This cost estimate is prepared assuming the above closure plan will be performed by non Care Environmental personnel, even though Care fully expects to close the facility at the end of its useful life. No discounts for Care's familiarity with the site or its contents have been taken in the calculation of the closure cost presented herein.

##### **4.6.1 Removal of All On-Site Wastes**

It is assumed that the maximum of 800,000 lbs of HHW, Universal, Hazardous and Waste oil will require removal upon closure. Based on the historical data regarding the various waste types handled by Care, the removal cost is based on the following:

|                                      |              |            |
|--------------------------------------|--------------|------------|
| HHW 450,000 lbs                      | \$0.15 /lb   | \$ 67,500  |
| Universal Wastes 200, 000 lbs        | \$0.20 /lb   | \$ 40,000  |
| Waste Oil 10,000 lbs                 | \$0.05 /lb   | \$ 500     |
| Hazardous waste 140,000 lbs.         | \$0.15/lb    | \$ 21,000  |
| 20 loads transportation average cost | \$750.00 ea. | \$15,000   |
| Total Transportation & Disposal      |              | \$ 144,000 |

##### **4.6.2 Waste Stream Sampling**

Most wastes received by Care are lab pack or loose pack containers. Packing lists for these containers are submitted to off-site facilities for approval. Samples are not needed or feasible for such containers. It is estimated that 25% of the volume of waste on hand at closure shall be bulk liquids or solids, which may require sampling and characterization prior to disposal. This is the equivalent of 500, 55-gallon drums of material. This would require 25 composite samples for analysis at \$ 815.00 each for complete TCLP and waste characteristic testing.

|                      |          |
|----------------------|----------|
| Total Waste Sampling | \$20,375 |
|----------------------|----------|

##### **4.6.3 Decontamination Costs**

Decontamination will be accomplished by manually washing all areas of the facility in a three-step process. The first wash will be done using garden sprayers filled with a commercial alkaline detergent solution. This solution will be sprayed on all surfaces, thoroughly wetting the surface and allowed to stand for 5 minutes. This will then be rinsed using clean water from drums or a



portable tank and pump at low pressure. The rinse water will be vacuumed and collected for disposal off-site. A second wash will be affected in a similar manner with the addition of manual scrubbing of all surfaces with stiff brooms or brushes and/or floor scrubber fitted with a stiff bristle cleaning wheel. The surfaces will again be rinsed and rinse water collected. The third wash will be performed using a solution of tri-sodium phosphate followed by three rinses of clean water. The final rinse water will be sampled for analysis and proof of clean closure. Analysis will be for TCLP and Priority Pollutants, including pesticides and PCB's. This third procedure will be repeated until the final rinse is clean in accordance with the standard of closure referenced above.

|                                   |                       |
|-----------------------------------|-----------------------|
| Portable water supply 2 weeks at: | \$750.00 per week     |
| Detergents                        | \$45.00               |
| Floor Scrubber Rental             | \$125.00 per week     |
| Misc. equipment/supplies          | \$200.00              |
| Sampling and Analysis             | \$1025.00 X 2         |
| Disposal of decon waters          | \$0.50/gal X 2500 gal |
| Transportation of decon water     | \$750.00              |
| Total Decon Cost                  | \$6045.00             |

(assumes two decon procedures due to one analytical failure)

Due to the nature of the materials handled and response to any spills during the active life of the facility, only Level C PPE will be required for completion of closure. PPE costs for the closure are estimated as follows:

|  |           |
|--|-----------|
| 5 men for 4 weeks using two sets per day at \$25.00 per day per man. |           |
| Total PPE cost   | \$2500.00 |

One soil sample shall be taken from each side of the facility outside the containment area. Results of these samples will be compared to one sample taken from the surface of sufficient distance away from the facility so as to reasonably expect it to be uncontaminated. A total of 5 soil samples will therefore be analyzed for total values of the TCLP parameters. For example, total lead, chromium, etc., instead of TCLP lead and chromium shall be determined.

The anticipated cost including one repeat analysis is:

|                       |           |
|-----------------------|-----------|
| 6 samples at \$425.00 |           |
| Total cost            | \$2550.00 |

It is anticipated that all soils will be clean, however this cost estimate assumes that some soil will require removal and disposal as hazardous waste:

|  |           |
|--|-----------|
| 20 cubic yards disposal at \$375.00 / yd |           |
| Transportation of soil \$750.00          |           |
| Total cost                               | \$8250.00 |

The oil water separator shall be pumped dry and washed with tri-sodium phosphate. This residue and wash water shall be disposed of off-site as non-hazardous by solidification and landfill at a cost of \$0.35 per gallon.

|                                |           |
|--------------------------------|-----------|
| Analysis of separator contents | 815.00    |
| Transportation and disposal    | 850.00    |
| Total cost                     | \$1665.00 |

|                                     |           |
|-------------------------------------|-----------|
| Professional Engineer Certification | \$2000.00 |
|-------------------------------------|-----------|

### Labor

|   |          |
|---|----------|
| 5 men, 4 weeks, 8 hrs/day at \$25.00/hr | \$20,000 |
|---|----------|

|                    |              |
|--------------------|--------------|
| Total Project cost | \$207,285.00 |
|--------------------|--------------|

FIGURE  
1

SITE PLAN

CARE ENVIRONMENTAL CORP.  
HOUSEHOLD HAZARDOUS WASTE  
TRANSFER FACILITY

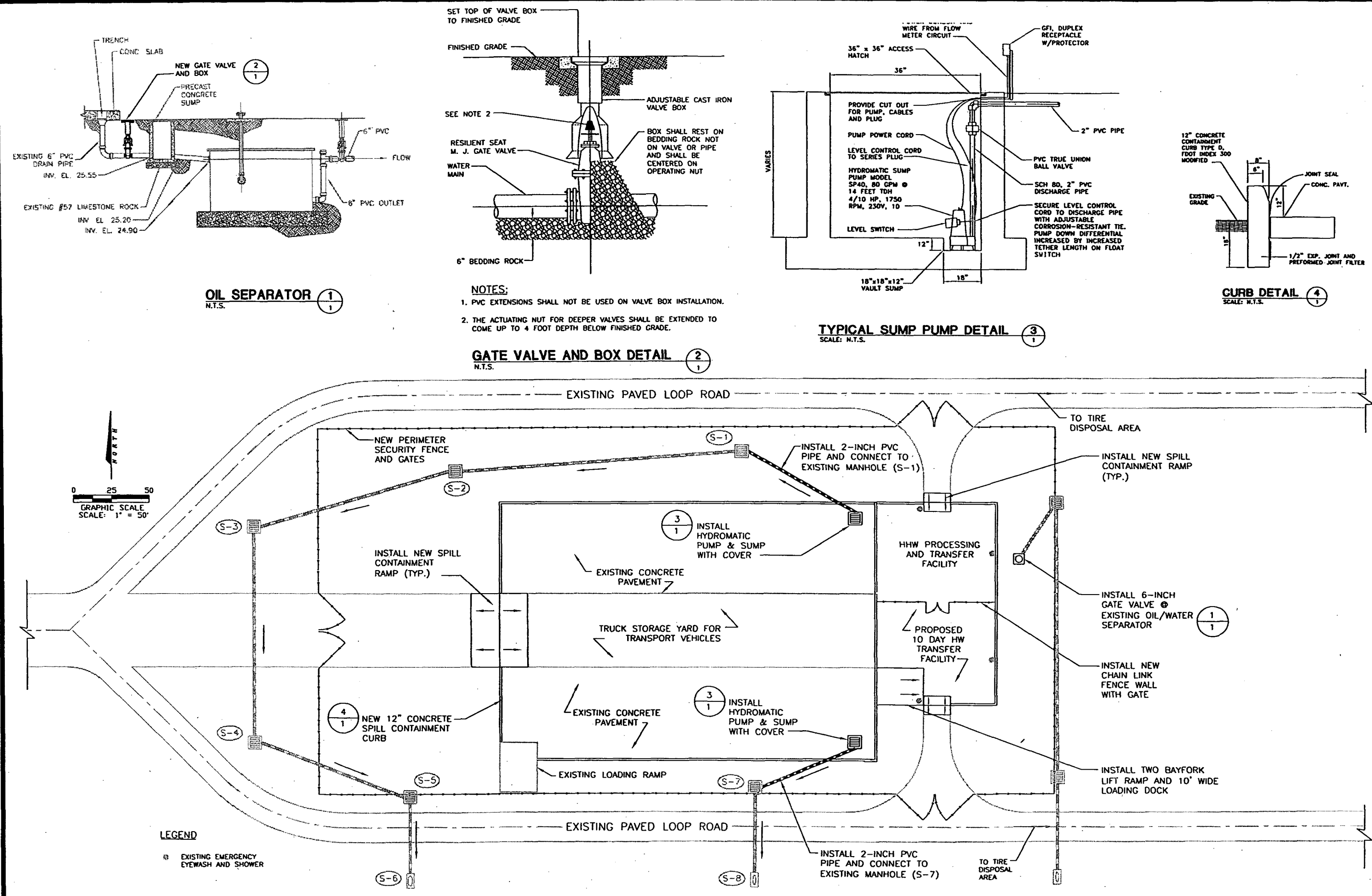
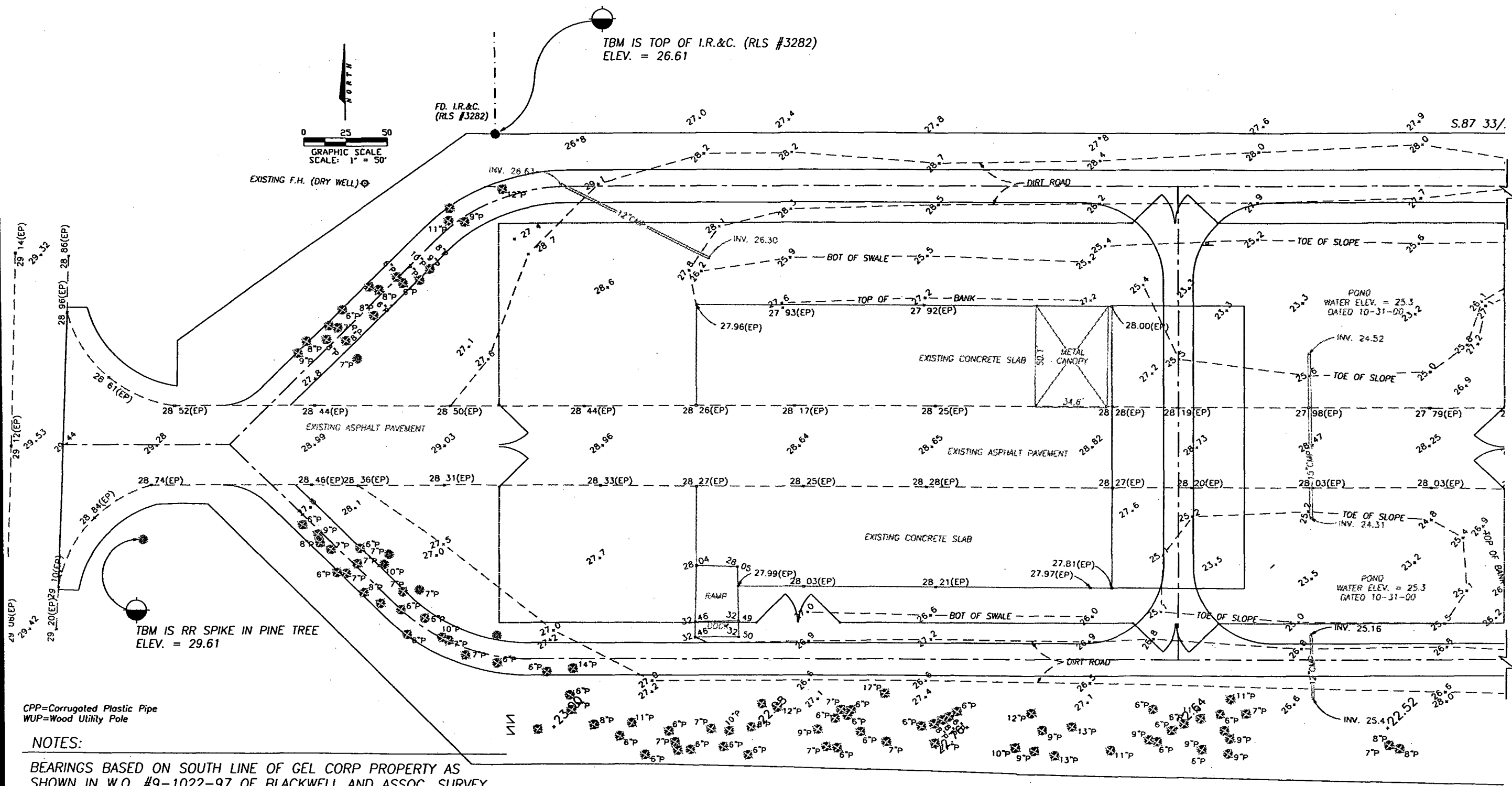


FIGURE 2

EXISTING GRADE

CARE ENVIRONMENTAL CORP.  
HOUSEHOLD HAZARDOUS WASTE  
TRANSFER FACILITY



MONITORING WELL  
B-451  
MONITORING WELL  
B-452