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November 17, 2023

Ms. Michell Mason Smith Environmental Administrator Hazardous Waste Program & Permitting Florida Department of Environmental Protection 2600 Blair Stone Rd. MS 4560 Tallahassee, FL 32399

Subject: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**US Ecology Tampa, Inc.** 

7202 East 8th Avenue, Tampa, FL 33619

**EPA ID No. FLD981932494** 

FDEP Application Nos. 34875-019-HO & 34875-018-SO

**PACSCON No. 2023-1816** 

Dear Ms. Mason Smith:

PACSCON GeoEnvironmental, Inc. (PACSCON), in collaboration with the applicant – U.S. Ecology Tampa (USET) – is providing this submittal (in electronic copy) in response to the Department's Request for Additional Information (RAI), dated October 30, 2023. Our document responding to each of Department's comments follows this transmittal letter, along with these supporting attachments:

Attach-	Original	Section or Appendix enclosed here	Change provided
ment #	Volume		
1	1 of 3	Section 2.0 General Facility Information (Revised)	requested minor additions
2	3 of 3	Appendix O – Hazardous & Solid Waste Closure Plans &	Appendix
		Supporting Documentation	
3	1, 2, 3	Professional Engineer Seal Pages:	ink signed/stamped vs. digital
		<ul> <li>Volumes 1,2,3: inside cover pages.</li> </ul>	signatures
		<ul> <li>Vol. 1, FDEP Applic. for HW Permit: P.E. page 9.</li> </ul>	
		Vol. 2, FDEP Applic[Solid] Waste": P.E. page 4.	
4	3 of 3	Figures, for:	added drawing dates,
		Set 1: USET Appl. Vol. 3.	no drawing changes
		Set 2: Vol. 3, Appendix Q [Contingency Plan].	

Regarding the figures provided in Attachment 4, as we were reviewing the Departments comments, we confirmed that the figures attached to the Facility Contingency Plan provided as Appendix Q in Volume 3 of 3 were also not dated and accordingly have updated and provided these figures as well.

We sincerely appreciate your assistance and guidance with this permit renewal process. Please do not hesitate to contact the undersigned should you have any questions or comments or require anything further to complete your review.

Professional Engineer's (P.E.'s) Certification

This is to certify that the engineering features of this hazardous waste management facility as amended by this document have been designed or examined by me (the undersigned P.E.) and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the state of Florida and rules of the Department of environmental protection. No warranties are implied or expressed. I reserve the right to revise my interpretations or conclusions based on additional information or evaluations.

Sincerely,

**PACSCON** 

Francisco J. "Paco" Amram, P.E.

Senior Engineer

Florida P.E. License No. 45133

PACSCON GeoEnvironmental, Inc. (PACSCON)

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Response to Comments Attachments (1 through 4)

EC:

K. Dean, USET
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STATE OF

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President | Founding Principal



# **RESPONSE TO RAI COMMENTS/REQUESTS**

1. Page 30: 2.3.5 WPB - Area 2, 7202 E. 8th Ave. - 9,900 Gallon Capacity. "The following operations are also performed at the WPB: 2) Clean, RCRA-empty roll-offs and/or dump trailers are positioned on the south side of the WPB in close proximity to the Hazardous Waste Treatment Tank, loaded with treated material, and then moved onto a roll-off truck which then re-locates the roll-off box into one of the four permitted bulk container storage areas discussed below in Section 2.3.5." Please correct this reference to Section 2.3.5; it should reference Section 2.3.6.

Response: Corrected as requested. Correction has been <u>underlined</u> for ease of review. Refer to Attachment 1.

2. Page 31: **2.3.6 BCSAs – Area 2, 7202 E. 8th Ave. – 800 CY Capacity** reads, "When the treated waste's confirmatory analysis is received, and the analytical results indicate that the waste has been successfully treated and meets all decharacterization and land disposal restriction (LDR) treatment standards, the waste will be considered non-RCRA waste." Although spelled out in the last paragraph of 2.4.5 on page 33, please provide details, in this section, of procedures when wastes still test as hazardous.

Response: Details have been provided as requested. Addition has been <u>underlined</u> for ease of review. Refer to Attachment 1.

3. Page 31: **2.3.7** In-Transit Truck Staging Area – Area **3**, **1902** N. Orient Rd. – No Permitted Capacity. Trucks and trailers in transit can park at rest stops. hotels, etc. without inspection requirements. However, because this area has an abundance of these vehicles, please include some frequency of inspection (Perhaps, this area can be included in the daily facility (each operating day) inspection).

Response: Inspection procedures have been provided as requested. Addition has been <u>underlined</u> for ease of review. Refer to Attachment 1.

4. The solid and hazardous waste closure plans and cost estimates were not provided. Please submit.

Response: Refer to Attachment 2.

5. Please have the engineer sign and seal the application.

Response: Refer to Attachment 3.

6. Dates must be included on the figures. Please revise.

Response: Refer to Attachment 4.





# **ATTACHMENT 1**

Volume 1 of 3, Section 2.0 - General Facility Information (Revised)

#### 2.0 GENERAL FACILITY INFORMATION

## 2.1 Permit Renewal Overview

This submittal is intended to renew the existing hazardous waste operating permit (34875-017-HO) for the US Ecology Tampa, Inc. (USET) facility (see Site Location Map, Figure 1) located at 7202 East 8th Avenue, Tampa, Hillsborough County, FL 33619. Site Area and Surrounding Area Maps are presented as Figures 2 and 3, respectively. An Overall Facility Layout Plan (Figure 7), a Permitted Facility Layout Plan (Figure 8), and a Boundary Survey (Figure 9) present surveyed, to-scale plans of the facility's processing, storage and office buildings, parking lots, retention ponds and adjoining and adjacent streets and offsite parcels. All figures referenced in this application are presented in Volume 3 of 3 of the consolidated permit application.

The total existing hazardous waste storage capacities by facility building/storage at the USET facility are summarized below:

MAXIMUM HAZARDOUS WASTE STORAGE CAPACITY BY AREA								
Building/Storage Area	Status	Location at Facility	SWMU	Capacity				
CSB <sup>1</sup> , ISCA <sup>2</sup> , I/O <sup>3,7</sup> Staging Area, Low Explosive Magazine, Consolidation Platform, and RUNI Screw Compactor	Existing	2002 N. Orient Road, 7202 E. 8 <sup>th</sup> Avenue, and Parking Lot West of Office Building	1, 2, 7, 8, 11, 21, 22	$50,000 \text{ gallons}^6$				
$\mathrm{WPB}^4$	Existing	7202 E. 8 <sup>th</sup> Avenue, West of Office Building	7	9,900 gallons				
10-day Transfer Area	Existing	7202 E. 8 <sup>th</sup> Avenue, Parking Lot, West of Office Building	11	20,000 gallons or 100 CY				
BCSAs <sup>5</sup> Existing Parking Lot, South of E. 9 <sup>th</sup> Avenue, North and West of Office Building		800 CY						
	79,900 gallons + 800 CY							

## NOTES:

- 1. CSB = Container Storage Building
- 2. ISCA = Improved Secondary Containment Area
- 3. I/O = Inbound/Outbound Staging Area
- 4. WPB = Waste Processing Building
- 5. Bulk Container Storage Areas
- 6. The 2,000-gallon storage for SWMU-21 is included in the 50,000-gallon total capacity.
- 7. The inbound staging area capacity of 20,000 gallons is not included in the 50,000-gallon total capacity; the outbound staging area capacity is a part of the 50,000-gallon total capacity.

This application has been prepared as a renewal for the current Resource Conservation and Recovery Act (RCRA) Hazardous and Solid Waste Amendment (HSWA) Operating Permit, No. 34875-017-HO,

finalized on April 13, 2023. While submitting this permit renewal application, USET is proposing the following minor changes to the existing permit:

- 1. With Florida Department of Environmental Protection (FDEP or Department) approval, the shredder was removed from the Waste Processing Building (WPB), which is designated Solid Waste Management Unit (SWMU) 7, on September 15, 2023. The recovered floor space in the northwestern portion of the WPB will be utilized for non-specific operational purposes (see **Figure 18**).
- 2. Move SWMU 16, the Universal Waste Lamp Storage Area, to the center dock location on the west side of the Consolidation Platform, SWMU 21 (see **Figure 12**).
- 3. Move SWMU 5, the Municipal Waste Dumpster, generally adjacent to the northeast corner of the Consolidation Platform, SWMU 21 (see **Figure 12**).
- 4. Request approval for the In-Transit Truck Staging Area located in Area 3 of the adjacent leased property (see **Figure 7**) to be used for both inbound shipments (as currently approved) and the overnight staging of outbound tractor trailers, box trucks, and/or roll-off trucks awaiting offsite transport.

The facility General Information, Inspection Plan, Contingency Plan, Procedures, Training Program, WAP, Container Management, Closure Plan, Risk/Offsite Exposure Analysis, and other sections have been updated as part of this renewal application and revised to reflect facility changes and more detailed and accurate conditions, as necessary.

## 2.2 Facility Background and Layout

USET is a division of EQ Holding Company, a Michigan Corporation, and a wholly owned subsidiary of Republic Services.

Facility ID No.: FLD 981 932 494 Current HSWA Permit No.: 34875-017-HO Pending HSWA Permit No.: 34875-018-HO

Facility Name: US Ecology Tampa, Inc.

Facility Address: 7202 East 8<sup>th</sup> Avenue, Tampa, FL 33619

Facility Telephone No.: (813) 623-5302 Facility County: Hillsborough

The USET facility is a permitted non-hazardous and hazardous waste storage and treatment facility and a registered hazardous waste transporter with a State-registered (on-site) transfer facility. No on-site disposal occurs at the USET facility. USET manages non-RCRA regulated waste, household hazardous waste, used oil and filters, mercury containing lamps and devices, TSCA-exempt and limited quantity exempt PCB and asbestos wastes, recyclable materials, and other similar substances, materials, and wastes. The primary waste management operations are: storage, consolidation and transfer of hazardous wastes, and treatment of hazardous wastes (D002, D004 through D011, and K062). The majority of inbound wastes are delivered to the CSB located at 2002 N. Orient Road. The I/O Staging Area is co-located with the 10-day Transfer Area on the East 8<sup>th</sup> Avenue property and used for incoming loads of hazardous waste awaiting receipt and unloading, and for full loads awaiting transportation to an offsite disposal and/or recycling facility. The In-Transit Truck Staging Area is located in Area 3 on the leased property located directly adjacent to the southeast of the East 8<sup>th</sup> Avenue property.

An Overall Facility Layout Plan, a Permitted Facility Layout Plan, and a Boundary Survey are included as **Figures 7** through **9**, respectively. A current aerial photograph of the site is utilized as the background of **Figures 7** through **15**, and a topographic map at a scale of 1 inch to 2,000 feet is included as Site Location Map, **Figure 1**. The facility is located outside the 100-year floodplain as indicated on the Federal Emergency Management Agency (FEMA) floodplain map included as **Figure 5**.

The land was previously undeveloped and no SWMUs were located on the site. The SWMUs currently identified on site are described in **Section 8.0**. The surrounding land uses are heavy industrial (see Figure 2 and 3). These include two National Priority List (NPL) (Superfund) sites, metals recyclers, a construction debris transfer facility, steel cleaning and coating, fishery, gas manufacturing, pesticide formulator, and bail bonds businesses. The surrounding land uses are shown on **Figure 3**.

The facility is located in the City of Tampa in a heavy industrial zoned area known as Orient Park. The area zoning is shown on **Figure 4**. The City of Tampa classifies this area as suitable for hazardous waste facilities. The West Florida Regional Planning Council (WFRPC) in 1985 performed in-depth evaluations to locate a suitable area for a hazardous waste storage and treatment facility, and this area was among those chosen.

The USET facility comprises 4.46 acres, more or less (MOL), with processing, storage, transportation and administrative operations conducted on two separate but adjacent/contiguous parcels located north and south, respectively, of East 9<sup>th</sup> Avenue, Tampa, Florida.

The northern parcel, or Area 1, contains the 5,866 square foot (ft²) totally enclosed CSB, with a "covered processing area" and "staging area" to the west and a retention pond to the east and adjacent to Orient Road (see **Figure 17**). The CSB is utilized for the container storage of hazardous waste and has three bays, Bay 1 (A & B), Bay 2, and Bay 3 (A & B). Within the Covered Processing Area is the ISCA discussed in **Section 2.3** below. Also located on the northern parcel is a small, one-story modular office building where receiving is done.

The southern parcel consists of a two-story office building with a small laboratory and adjoining Solid Waste Operations Area (see **Figure 8**), asphalt parking areas, retention ponds and the 8,050 square foot covered, open-sided WPB that houses the on-ground solid waste solidification tank, non-hazardous waste storage (drums and containers), on-ground hazardous waste treatment tank, storage area for hazardous waste chemicals (up to 9,900 gallons), and a low explosive reactives magazine (see **Figure 18**).

A RCRA Facility Assessment (RFA) of the USET facility was initiated on February 15, 1993. An RFA Addendum was prepared by FDEP on May 13, 2011. To date, there have been no releases to the environment of hazardous waste or hazardous waste constituents for any USET SWMU. Refer to **Figure 12** and **Appendix D** for further information regarding the existing SWMUs at this facility. All Appendices referenced in this application are included in **Volume 3 of 3** of the consolidated permit application.

# 2.3 Facility Operations Layout

Below is a detailed explanation of the various hazardous waste operations which occur within the defined buildings and existing permitted storage areas across the USET facility. The Area 1 through 3 designations indicated in the subtitles below correspond to those depicted on **Figure 7**.

# 2.3.1 CSB and ISCA – Area 1, 2002 N. Orient Rd. – 50,000 Gallon Capacity

The CSB (**Figure 17**) was built in accordance with the Florida Fire Prevention Code and is composed of three separate bays. The bays are separated by an eight-inch-wide concrete block wall and 4-hour fire rated doors. The concrete block wall extends from the floor to the roof and has been designed with a minimum fire-resistance-rating of four hours. Bays 1 and 3 are used for storage of all of the permitted hazardous waste codes (see **Appendix B**). Bay 2 is used for the storage of ignitables, reactives and cyanides only.

All solid and hazardous waste is received at the CSB before further processing and/or storage. The CSB (and adjoining ISCA) has a total permitted hazardous waste capacity of 50,000 gallons. Of those 50,000 gallons, a maximum of 20,000 gallons each is permitted for Bays 1 and 3, and a maximum of 10,000 gallons is permitted for Bay 2. The ISCA is located in the loading/unloading area within the Container Processing Area west of the CSB on the west-side of Bays 2 and 3A and is constructed with two concrete containment walls. As stated previously, it shares a maximum allowable capacity of 50,000 gallons with the CSB, so at no time will the combined waste capacities exceed 50,000 gallons. This 50,000-gallon total capacity amount is known to be consistent with the physical limitations of the CSB and adjacent ISCA. Actual day-to-day volume is usually less than 25,000 gallons/day. The ISCA was specifically constructed in order to provide secondary containment for the following operations:

- 1) Recontainerization/Over-Packing. Some of the waste received at the CSB will be recontainerized or over-packed from one container to another. Specifically, lab pack containers will be repackaged in accordance with the requirements of USDOT 49 CFR 173.12(b). In general, re-containerization includes consolidation of like waste into similar sized or larger containers. Wastes are transferred between containers by pumping (using a portable pump) or pouring directly from one container to another. All container transfer operations take place either within the CSB or the ISCA. Other recontainerization operations will include drum crushing and rag compacting (SWMU 18, Figures 12 and 17), loading to roll-offs, and loading to tanker truck. Loading to roll-offs and tanker trucks only takes place within the ISCA.
- 2) Paint Can Crushing (SWMU 9). The facility receives water-based latex and solvent-based paint in containers up to 5-gallons for re-containerization and disposal. The majority of the paint received is from household waste. This operation will include opening the container, crushing the paint can, collecting the paint waste, collecting the empty containers, and containerizing the paint for transport off-site. This operation will take place within the permitted ISCA processing area identified on Figures 12 and 17.

All waste transfer and re-containerization is conducted utilizing "best management practices" (BMP). Hazardous wastes have already been profiled and approved as described in the USET Waste Analysis Plan (WAP) (see Section 4). Each hazardous waste stream has been sampled and quality control verified as described in the USET WAP. Only compatible wastes are transferred or re-containerized in each batch operation. The same waste management practices for inspections, contingency, preparedness and prevention, training, precautions for ignitable, reactive, and

incompatible wastes, waste analysis, record keeping, and container management that apply for treatment and storage will also apply for waste transfer and re-containerization.

USET will utilize the container arrangement shown on **Figure 17**. The containers will normally be stored in a "single-stacked" arrangement, although small containers (such as 5-gallon pails) may be manually stacked on top of the "single stacked" containers. USET will occasionally utilize a double-stack container arrangement. Pallet jacks are used in the CSB due to the fact that they are smaller and easier to navigate than forklifts and more efficient, given the lack of room to maneuver within the CSB.

# 2.3.2 Platform and Compactor – Area 1, 2002 N. Orient Rd. – 2,000 Gallon Capacity

The consumer products consolidation platform (SWMU 21) consists of a semipermanent loading dock specifically designed and manufactured for the USET facility. The loading dock is semipermanent in the sense that the sections of the dock are essentially portable but are deployed in such a manner as they are a permanent consolidation platform solution as shown on **Figure 17**. The consolidation platform is anchored to monolithically poured concrete foundations and is manufactured of heavy-duty diamond plate treated with a marine grade epoxy for traction. It is 60 feet long by 16 feet wide and contains four truck loading docks and a set of stairs on the west side and another loading dock and a 30-foot-long by 8-foot-wide drive ramp on the east side. The consolidation platform is covered from the elements and sun using a canopy that is permanently mounted to poured in place concrete footings. The canopy has a maximum peak height of  $\pm 29$  feet and can accommodate a maximum anticipated internal equipment clear hit of  $\pm 23$  feet. The cover of the canopy is removable during periods of severe weather. Examples of wastes processed in this area may include paints, thinners, solvents, pesticides, herbicides, fertilizers, pool chemicals, motor oil, greases, hydraulic oils, acidic and caustic cleaners, and personal care products such as soaps, hair care, etc.

To contain any incidental spills or releases that may occur during processing operations, the entire footprint of the consolidation platform is secondarily contained at ground surface using either concrete curbing or drive-over spill containment berms, as appropriate. The concrete foundations and curbing are treated with an additive, Xypex Admix C-500/C-500 NF, which consists of Portland cement, silica sand and various active, proprietary chemicals that are added to the concrete mix at the time of batching. The active chemicals in the additive react with the moisture in fresh concrete and with the byproducts of cement hydration to cause a catalytic reaction that generates a non-soluble crystalline formation throughout the pores and capillary tracts of the concrete which permanently seals the concrete and prevents the penetration of water and other liquids from any direction.

Box trucks or trailers transporting retail waste or household hazardous waste (HHW) to the platform backup directly to the loading docks to offload and/or these materials are brought to this area from the CSB using a forklift or other type of acceptable transport method. Popup containments are deployed underneath the unloading areas to contain any incidental spills or releases that might happen during transfer operations. Following the completion of processing or recontainerization activities, containers are placed back inside the CSB for storage. A portion of the 50,000-gallon storage capacity for the CSB, ISCA, and the I/O Staging Area has been reallocated to the platform to account for the 2,000 gallons of storage allowed at this location. At no time will the authorized 50,000-gallon storage capacity be exceeded.

A RUNI SK370 screw compactor unit (SWMU 22) and conveyor system were installed with the consolidation platform and canopy. It is primarily used for processing containers of retail herbicides and pesticides and compacted dunnage. The discharge, toxic liquids, and reject materials from the screw compactor are contained in an IBC tote the contents of which are managed (recontainerized) on the consolidation platform when full. The RUNI screw compactor is permanently mounted to poured in place concrete footings and its operational footprint is secondarily contained at ground surface using either concrete curbing or drive-over spill containment berms, as appropriate, to contain incidental spills or releases. Activities performed using the screw compactor unit have been demonstrated to be exempt from air emission regulation under the Generic Emission Unit Exemption requirements in Rule 62-210.300(3)(b)1, F.A.C.

Rainwater accumulated in the containment areas or pop-up containments in the footprint of the consolidation platform and screw compactor is visually inspected for signs of impact, such as discoloration, turbidity or suspended solids, foam, an oil sheen, or other obvious indicators of potential pollution prior to draining. If there are no obvious indicators of potential pollution in the rainwater it is drained directly from the containments to the surface. Rainwater possessing obvious indicators of potential pollution is not drained directly to the surface and is addressed using absorbents or other applicable means until the indicator has been removed prior to draining, or the rainwater is pumped out of the containments and placed into the facility process. At the discretion of facility management, any potentially impacted rainwater in the containments may also be pumped out and transported offsite for proper disposal.

Certification of construction completion (dated July 25, 2023) of the consolidation platform (SWMU 21) and integral screw compactor unit (SWMU 22) was approved by the FDEP on September 11, 2023.

## 2.3.3 I/O Staging Area – Area 2, 7202 E. 8th Ave. – 20,000 Gallon Capacity

The I/O Area (SWMU 11) is only used for inbound loads waiting for unloading and receipt and outbound loads waiting for completed transportation paperwork. Vehicles/trailers in this area are marked as either an inbound load or an outbound load to avoid being confused with other vehicles/trailers that may also be located in the same vicinity. The inbound identification tags are clearly visible and include the vehicle/trailer number, manifest document number, trip number (if applicable), receipt date, container count and total gallons. The outbound identification tags are also clearly visible and include the trailer number, manifest document number, start date, destination, container count and total gallons. USET may be either the generator or the designated facility. The inbound staging area capacity of 20,000 gallons is not included in the 50,000-gallon total capacity.

# 2.3.4 10-Day Transfer Area – Area 2, 7202 E. 8th Ave. – 20,000 Gallon or 100 CY Capacity

The 10-Day Transfer Facility (SWMU 11) is used to store manifested hazardous waste on site for no longer than ten (10) days as allowed for transfer facilities. It will not be utilized for any waste where USET is the designated facility on the manifest or originated at the facility where USET is listed as the generator. Vehicles and trailers parked in this area are marked as a 10-Day vehicle/trailer to avoid being confused with other vehicles/trailers that may also be located in the same vicinity. The 10-day identification tags are clearly visible and include the vehicle/trailer number, manifest document number, start date, destination, container count and total gallons. Transfer facility waste shipments are noted in a separate Transfer Log (operating record).

#### 2.3.5 WPB - Area 2, 7202 E, 8th Ave. - 9,900 Gallon Capacity

The WPB (SWMU 7) includes the following units/storage areas (see Figure 18):

- 1) A non-hazardous drum storage area.
- 2) A permitted Reactives Storage Container Unit used for the temporary storage of reactives only. The total capacity of the magazine is 575 gallons which is included within the 50,000-gallon waste storage capacity shared between the CSB, ISCA and I/O Area.
- 3) A non-hazardous waste solidification tank.
- 4) A permitted hazardous waste treatment tank.
- 5) A hazardous waste storage area with a permitted capacity of 9,900 gallons.

The 8,050 ft² WPB has a total calculated storage capacity of 185,360 gallons (refer to **Appendix G**) and complies with 264.175(a) and 264.175(b)(1) through (b)(5). The entire WPB is surrounded by a concrete curb. The concrete slab in the north side of the building is sloped towards the center of the north side, which directs liquids towards a 50-gallon subsurface sump in that location. The concrete slab in the southern portion of the building is sloped towards a subsurface sump located near the south side of the building. These sumps allow for more efficient removal of liquids. Liquids accumulated in the sumps, from leakage or spills of containers (if any), will be managed as the waste which caused the leak or spill and be placed into the appropriate treatment/solidification tank (non-hazardous or hazardous), a tanker truck, or other container by suitable means (such as pumping to drums). Spillage of liquids on the hazardous waste side of the operations (southern end of the building) will be routed to the sump in this portion of the building) will be primarily routed to the sump in this portion of the building, although some may drain to the sump in the hazardous waste operations area.

In order to separate the hazardous waste operations from the solid waste operations, a 12-in wide bright yellow line delineates between the two access ramps on the east and west sides of the treatment building and separating the north from the south sides. A similar bright yellow line encompasses the perimeter of the reactives magazine.

The following operations are also performed at the WPB:

- 1) Recontainerization/Over-Packing. Some of the waste received at the WPB will be recontainerized or over-packed from one container to another. In general, recontainerization includes consolidation of like waste into similar sized or larger containers. Wastes are transferred between containers by pumping (using a portable pump) or pouring directly from one container to another. The applicable management practices discussed for the CSB in Section 2.3.1 will apply to the management of recontainerized material handled in the WPB.

## 2.3.6 BCSAs – Area 2, 7202 E. 8th Ave. – 800 CY Capacity

The BCSAs (SWMU 20a through 20c) are for hazardous waste that has been treated in the hazardous waste treatment tank, sampled for confirmatory analysis, is a solid (passes the paint filter test), and has been removed from the treatment tank. Until confirmatory analysis is received from

a certified laboratory, the waste will be considered hazardous waste. When the treated waste's confirmatory analysis is received, and the analytical results indicate that the waste has been successfully treated and meets all decharacterization and land disposal restriction (LDR) treatment standards, the waste will be considered non-RCRA waste. If the treated material fails the initial screening and is still characteristically hazardous or fails to meet LDRs or PFT, it will be re-treated until it has been confirmed that the treated waste is physically solid and no longer retains hazardous characteristics. The asphalt parking lot area where the BSCAs are located is sloped (Figures 8 and 12) and drains precipitation away from the storage area and the stored bulk containers. The bottom of the bulk containers are elevated 6-8 inches above the ground and are protected from contact with any liquids (precipitation, stormwater runoff) that may accumulate. Both 20-yard roll-off containers and dump trailers may be stored in the BCSAs pending the receipt of confirmatory analysis and/or off-site transport.

Since the stabilization process post treatment in the hazardous waste treatment tank is exothermic, a high pH liquid has been found during previous site inspections to condense on the roll-off cover and leak onto the pavement beneath the roll-off box. Pop-up containments, or equivalent, will be used as a standard BMP to prevent any potential leaking while roll-offs and/or dump trailers are staged and cooled post treatment. The roll-off boxes or dump trailers will be moved from the temporary pop-up containments, or equivalent, after it is determined that the material has cooled and placed elsewhere within SWMU 20 pending the receipt of confirmatory analysis and/or off-site transport.

While USET believes that the roll-off boxes and/or dump trailers containing confirmed solids will not leak, in the event that leakage is identified/observed, the area will be immediately contained and cleaned up in accordance with the Cracks and Gaps SOP (OPS-OP-078-FLA) contained in **Appendix J**.

# 2.3.7 In-Transit Truck Staging Area – Area 3, 1902 N. Orient Rd. – No Permitted Capacity

USET temporarily parks in-transit trucks on this leased property located directly adjacent to the southeast of the permitted facility (see **Figure 7**). The trucks are either be in-transit to and awaiting acceptance and processing at the USET facility or will be in the process of completing a pickup route prior to acceptance and processing at the facility. USET has knowledge of the materials and their acceptance into the facility before transit to the facility. Through this permit renewal application, USET seeks FDEP approval for the overnight staging in this area of outbound trailers awaiting offsite transport.

The parking area is concrete paved and entirely surrounded by perimeter fence that can only be accessed by authorized facility or delivery personnel. A maximum of up to six in-transit trucks are parked in the designated area at any given time. The trucks parked in this area consist of tractor trailers, box trucks, and/or roll-off trucks. The box trucks are typically 26 to 28 feet in length while the trailers are either 48 or 53 feet in length. Vacuum tankers/trucks may also be parked in this area while in transit. The area will be inspected on a weekly basis and noted on the facility's daily inspection log when completed.

## 2.4 Operations Description - Overview

The hazardous waste operations at the USET facility consist of the treatment of permitted listed and characteristically hazardous wastes (Waste Codes D002, D004 through D011, and K062) and storage of hazardous waste in containers, primarily 55-gallon drums, although waste may be also be received in 250-

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gallon, 275-gallon totes, and cubic yard boxes. A minimum of 10 percent of each hazardous waste stream entering the facility is sampled. Some waste is recontainerized or consolidated in other containers. Recontainerization operations may also include USET of the following equipment: paint can crusher, drum crusher, rag compactor, and RUNI screw compactor. Wastes not treated on site are shipped offsite for final disposal and/or recycling.

Hazardous wastes treated in the on-ground treatment tank that meet the LDRs, contain no free liquids (as determined by EPA SW-846 Method 9095B [i.e., Paint Filter Test (PFT)]) and no longer exhibit hazardous waste characteristics (i.e., have been decharacterized) based on TCLP test results will be loaded into roll-off boxes or dump trailers for subsequent off-site disposal at an approved disposal facility.

#### 2.4.1 Waste Received

All solid and hazardous waste is received at the CSB before further processing and/or storage. Waste may be received at the facility in any size container up to 275-gallon totes. Waste is also received in other DOT-approved containers including bulk shipments. Drums and other portable containers are off-loaded into the CSB. Bulk shipments are stored in the ISCA located on the loading dock in front of Bay 2. Received containers are moved, categorized, and stored according to waste type. The following waste type categories (40 CFR 261.30 indicates the basis for listing the classes or types of wastes listed in 40 CFR 261 Subpart D) are handled at the facility:

- 1. Ignitable Waste (I)
- 2. Corrosive Waste (C)
- 3. Reactive Waste (R)
- 4. Toxicity Characteristic Waste (E)
- 5. Acute Hazardous Waste (H)
- 6. Toxic Waste (T)
- 7. Non-RCRA Regulated Waste

No forbidden explosives as defined in 40 CFR 261.23(a)(8), regulated radioactive, or regulated biohazardous waste will be managed at the USET facility. Waste types include liquids, solids, sludges, and a variety of lab packs (waste which is packaged in its original container).

#### 2.4.2 Recontainerization

Some of the waste received will be recontainerized or over packed from one container to another. In general, recontainerization includes consolidation of like waste into similar sized or larger containers. Wastes are transferred between containers by pumping (using a portable pump) or pouring directly from one container to another. All container transfer operations take place either within the CSB, the WPB, or on the consumer products consolidation platform except for the paint can crushing and the drum crusher/rag compactor operations.

Other recontainerization operations will include the RUNI screw compactor, paint can crushing, drum crushing and rag compacting, loading to roll-offs and dump trailers, and loading to tanker truck. All waste transfer and recontainerization is conducted utilizing BMPs. Hazardous wastes have already been profiled and approved as described in the USET Waste Analysis Plan (WAP) (see **Appendix J**). Each hazardous waste stream has been sampled and quality control verified as described in the WAP. Only compatible wastes are transferred or recontainerized in each batch operation. The same waste management practices for inspections, contingency, preparedness and prevention, training, precautions for ignitable, reactive, and incompatible wastes, waste analysis,

record keeping, and container management that apply for treatment and storage will also apply for waste transfer and recontainerization. Waste processing areas are identified on **Figure 11**.

USET refers to the recontainerization and compatibility testing as "Consolidated Confirmatory Compatibility Testing" and the text in subsequent sections has been modified to reflect this clarification. The SOP that USET has prepared for assuring compatibility during recontainerization is referred to as "Liquids Bulking" and is provided in **Appendix J** with other applicable USET SOPs pertinent to this hazardous waste renewal application.

## 2.4.3 Paint Can Crushing

The facility receives water-based latex and solvent-based paint in containers up to 5-gallons for recontainerization and disposal. The majority of the paint received is from household waste. This operation will include opening the container, crushing the paint can, collecting the paint waste, collecting the empty containers and containerizing the paint for transport off-site. Hours of operation of this equipment will be tracked using the Paint Can Crusher Usage Tracking Log, OPS-FM-116-FLA. This operation will take place within the permitted processing areas identified on **Figure 16**.

# 2.4.4 Drum Crushing and Rag Compacting

The drum crusher and rag compactor consists of a closed cabinet unit located on the ramp outside Bay 3. A drum is placed inside the unit and a ram is used to crush the drum. The unit contains a grate and collection pan at the bottom to catch any liquid or solid residue material from the crushed drum. The material is drummed as waste.

The rag compactor works in a similar manner in that a drum of waste rags is placed inside the unit. A ram, which is slightly smaller than the drum opening, is used to compact the rags inside the drum.

## 2.4.5 Treatment of Characteristic and Listed (K062) Hazardous Wastes

The goal of treating characteristic (D002 and D004 through D011) and listed hazardous waste (K062, untreated pickle liquor, an acidic material, from SIC codes 331 and 332 only) is to stabilize the material in a manner that the resulting mixture no longer exhibits the characteristics of hazardous waste and meets the LDRs. The first step in the process for all liquid wastes is the neutralization (NEUTR) of D002 acidic or alkaline materials. Treatment of characteristic waste (D002 and D004 through D011) must meet 40 CFR 268.40 and Underlying Hazardous Constituents (UHCs), if required. The facility is not permitted to treat F-, P-, or U-listed waste materials or organic UHCs. Additionally, when wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue must meet the lowest treatment standard for the constituent of concern. See the WAP in **Appendix J** for additional details. Adding prescribed reagents to the waste raises the pH of the mixture to an optimal metals' treatment range of 9 to 13. Once the mixture is at this optimum pH range, the toxicity of the hazardous components (RCRA metals) are reduced or eliminated by lowering their solubility and leaching ability. A solidifying reagent is added to the treated mixture in the final step of the treatment process eliminating any free liquids that may remain after thorough mixing.

The hazardous waste treatment tank is a custom manufactured piece of equipment, essentially meeting the 40 CFR, Part 260.10 definition of an on-ground tank. The unit is constructed of steel plates that have been welded into the shape of a box. The box is 20-ft. wide by 20-ft. long and is

4-ft. 7-in tall. The floor of the tank is 3/4-in steel plate and the side walls of the tank are 1/2-in steel plate. The top of the box is open. The connections between the plates are joined together with full penetration welded joints so that the box is liquid-tight and will not allow waste to escape. The treatment tank will also be anchored to the floor on the north, west and south sides. The design and installation of the on-ground treatment tank complies with all the requirements specified in 40 CFR, Subpart J, and the design drawings and specifications for the treatment tank are provided in **Appendix I**.

The primary reagents used for treatment of the waste include hydrated lime/lime kiln dust, ferrous sulfate, sodium sulfide/sulfide flakes, and hypochlorite. The amount of reagent varies based on the waste stream but is generally a 5:1 ratio (waste:reagent) when absorbing liquids and 10:1 for solids (i.e., 1 ton of waste to 200 pounds of lime).

The waste selected for treatment is deposited directly into the top of the box by pumping pouring, etc. The pH is then adjusted (neutralized) and then raised by adding treatment reagent to the waste until the optimal metals' treatment range of 9 to 13 is reached. The material is mechanically mixed using a backhoe, portable mixer, or similar piece of equipment thoroughly to ensure that all of the material has been treated. A solidification agent is then added to the treated mixture which eliminates any free liquids that may remain. The resulting mixture is of a homogenous consistency. Once the material has completed the treatment and solidification process, a grab sample of the treated material is collected from the treatment tank for verification analysis by a National Environmental Laboratory Accreditation Program (NELAP) accredited laboratory. The material is then removed from the treatment tank by an excavator or other similar piece of heavy equipment and placed into a lined, sealed, bulk container. The bulk container is then moved to the proposed BCSA pending analysis.

The grab sample is subjected to a TCLP test to assure compliance with the LDRs as well as running a PFT by Method 9095B to assure the absence of free liquids. Treated materials that are decharacterized, meet the LDRs, and contain no free liquids are sent for disposal at an approved disposal facility (Subtitle D landfill). If the treated material fails the initial TCLP screening and is still characteristically hazardous or fails to meet LDRs or PFT, it will be re-treated until a TCLP, LDR, and PFT tests have confirmed the treated waste is physically solid and no longer retains hazardous characteristics. It should also be pointed out that the disposal facility accepting the treated material may require additional testing above and beyond a TCLP test before they will accept the waste. USET will determine testing requirements for the proposed disposal facility and have the samples analyzed accordingly.

Reference Appendix J, Hazardous Waste Treatment OPS-OP-071-FLA, for additional detail.

# 2.4.6 Loading to Roll-Offs/Dump Trailers

Recontainerization operations will include loading material to roll-off boxes and/or dump trailers for transport off-site. Roll-offs or dump trailers will be loaded in the loading/unloading area located outside the CSB. Loaded roll-offs or dump trailers will be manifested and shipped off-site for ultimate treatment and disposal.

Treated hazardous wastes that no longer exhibit hazardous waste characteristics, contain no free liquids, and meet the LDRs based on the TCLP grab sample test results, will be loaded into bulk containers. They will be subsequently manifested off-site for disposal at an approved disposal facility. Because solid waste and decharacterized hazardous waste containing no free liquids and

meeting the LDRs may be stored in the WPB in bulk containers, proper paperwork will be completed and associated with each load in the event a facility inspection is performed.

Typically, only solid material is loaded into the roll-off containers and/or dump trailers, although some sludge material may also be off-loaded; however, free-flowing liquids are not typically contained in the roll-offs or dump trailers. The roll-offs and dump trailers will be kept closed except when loading.

Roll-off containers or dump trailers approved for storing or transporting liquids will be utilized if the hazardous waste being transported or stored contains free liquids. These containers may include "sludge boxes" or sealed roll-offs with liners.

# 2.4.7 Reactives Magazine

The reactives magazine consists of a custom Type 2 Class ABC, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) specification indoor magazine manufactured by Armag Corporation. The exterior of the magazine is constructed of ¼-inch ASTM A-36 prime steel and the interior is lined with 2-inch hardwood to meet bullet resistant requirements. It has a front opening door (cabinet type), casters, shelving, a double lock system with ¼-inch steel lock covers, two ATF approved padlocks, one 12-inch by 24-inch magnetic sign reading "DANGER-EXPLOSIVES," top lifting D-rings, and a red exterior finish. The dimensions of the magazine are 6 feet long by 6 feet wide by 7 feet tall, and the approximate weight of the unit is 6,000 pounds empty. Information on the reactives magazine is contained in **Appendix I**.

The reactives magazine will be used for the temporary storage and pass-through of road flares, DOT 1.4 explosive material, marine aerial and signal flares, small arms munitions, black powder, residential fireworks and other permitted explosives. D001, D003, D005 and D008 are the most common waste codes managed in the reactives magazine. These wastes are shipped to the facility in USDOT approved containers and are typically reconsolidated into larger containers for more efficient accumulation and offsite disposal. The accumulation period for waste stored in the reactives magazine can be up to 1-year. Due to the limited size and nature of the material (consumer commodities), the storage of this material is exempted from the provisions of the Federal explosives laws and a Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) storage license is not required. No forbidden explosives will be transported to the site and/or stored in the magazine. No treatment or processing of explosive materials will be completed onsite.

There will be no staging of material in the reactives magazine area. Once moved to the reactives area, the material will immediately be placed in the unit. There should be no exposure to the elements because of the short duration of time between movement to the reactives magazine and placement in the unit. It will be kept secure by being locked except for those instances where material is added to or removed from the unit.

#### 2.4.8 Tanker Loading/Unloading

Tanker loading/unloading can occur at either the CSB or WPB depending on the type of waste material received at the facility. Liquid wastes will be loaded to a tanker truck for transport off-site. Wastes will be pumped from a container directly to the tanker. If the waste material can be treated onsite it will be containerized in drums or totes and/or pumped directly into the treatment tank within the WPB. Compatibility will be determined through the facility waste acceptance and approval process if the waste is to be containerized. If there is no waste in the treatment tank, the

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liquid will be pumped directly into the tank following waste acceptance. If wastes are already present in the treatment tank, an onsite Consolidated Confirmatory Compatibility Test will be performed prior to offloading any additional waste into the treatment tank. Tankers will be kept closed except when loading/unloading.

#### 2.4.9 Empty Container Management

Empty containers and/or inner liners removed from empty containers which meet the requirements of 40 CFR 261.7 will be managed as RCRA Empty. Empty containers and/or liners that have held an acute hazardous waste listed in 40 CFR 261.31, 231.32, 261.33(e) will be managed as Acute Empty. Containers and/or liners which do not meet the requirements of RCRA Empty will be managed as Non-Empty Containers.

RCRA Empty containers smaller than 55 gallons will be recycled or managed as non-RCRA regulated solid waste. RCRA Empty containers 55 gallons and larger will be recycled, returned to reconditioners, or managed as non-RCRA regulated solid waste.

RCRA-Empty containers will be accumulated on an empty trailer, and/or at the truck loading/unloading area. The empty containers will be sent off-site for recycling, reconditioning, and/or disposal when sufficient quantity is available (usually a truckload). The empty container storage area will be inspected as per the inspection plan. Empty containers may be crushed and/or compacted on site.

Acute empty containers will be triple rinsed or managed as hazardous waste. Containers that are triple rinsed will be thoroughly rinsed using an appropriate solvent a minimum of three (3) times. The container will be fully emptied into a container, typically a 55-gallon drum or 5-gallon bucket following each rinse. The collected rinse solvent will be managed as hazardous waste. The rinsing will occur within the CSB or WPB above the impervious floor.

Non-Empty containers will be managed as per the requirements for the material within the container.

## 2.4.10 HHW Management

USET manages a significant quantity of HHW. The HHW is solid waste which is not hazardous waste as defined in 40 CFR 261.4 (b) 1). The HHW is regulated under Subtitle D regulations which (by definition) do not apply to this permit. The inclusion of HHW information is for informational purposes only. Upon receipt at the facility, HHW is entered into the facility waste tracking system. The origination source of any HHW accepted at the facility can be readily determined through the waste tracking system and will determine the appropriate regulatory requirements under which the waste is managed. USET exceeds all applicable regulations for HHW Management. Nearly all HHW managed at the USET facility is managed as if it were hazardous waste. USET typically manifests (including LDR notification) labels and enters this information into the facility operating record for HHW shipments. Other permit requirements such as training, inspections, and contingency are typically adhered to by USET for the management of HHW. The management of HHW is included in USET facility, containment, closure, and financial assurance calculations. Management of HHW does not interfere with management of RCRA regulated hazardous waste.

#### 2.4.11 Universal Waste

The facility receives Universal Waste including batteries, aerosols, and mercury-containing lamps such as fluorescent lamps. If Universal Waste is received in containers that show evidence of leakage, spillage, or damage that could cause leakage, the material will be repackaged into containers that are structurally sound and compatible with the waste. All Universal Waste is handled in a manner that will prevent breakage, releases of their components, and their exposure to moisture. Once received, the lamps and batteries are placed in storage and are included as part of the total CSB inventory. Universal Waste batteries are stored on the ramp located adjacent to Bay 3B as shown on **Figure 17**. Universal Waste Lamps are stored in the cargo area of a box truck that is able to be sealed from the weather. The storage location for the Universal Waste Lamps is also illustrated on **Figure 12**.

# 2.4.12 Unknown Waste Handling Procedures

USET periodically receives unknown waste generated from off-site emergency clean-up activities. The unknown waste in all cases have been sufficiently characterized (by laboratory quality control, or similar means) to determine the waste compatibility and hazard class. This information will be sufficient for DOT approved shipping and handling of the waste but may not be sufficient to fully manage the waste per 40 CFR Part 268 (LDRs) until further information is received. USET will utilize the following procedure for the management of "not fully characterized" (*i.e.*, unknown) wastes.

- 1. USET (or other approved) personnel will sample the container of waste using FDEP SOP FS 5000 (Waste Sampling) as a guideline.
- 2. Field screening tests for color, density, physical state, pH, ignitability, oxidizer potential, solubility, and water reactivity will be performed to characterize the compatibility and hazard class of the waste.
- 3. The waste will be labeled and manifested for transport to the USET facility. Shipping name will be determined by the field characterization and, at minimum, will be Hazardous Waste Solid (or Liquid), Not Otherwise Specified (NOS). The legend "Pending Analysis" will be written on the container (or label) and manifest.
- 4. Any "not fully characterized" (unknown) waste received by the USET facility will be segregated from all other hazardous wastes until the wastes are identified and waste compatibility is determined. This is an extra precautionary measure since waste compatibility will have been field determined prior to receipt. The segregated area utilized for these wastes will have a separate containment system not contiguous with the containment systems provided for the known wastes. USET utilizes containment pallets for separate containment.
- 5. Each container of "not fully characterized" (unknown) waste will be sampled and analyzed following the procedures specified in the USET WAP.
- 6. Once the waste is fully characterized, the waste will be moved to the appropriate storage location and scheduled for treatment or shipment to an off-site disposal facility.
- 7. USET will notify the Department detailing waste type and quantity if characterization of the waste indicates the waste is not authorized by the USET permit. The waste will be shipped to a permitted treatment, storage, disposal facility if it is not authorized by the USET permit.

## 2.4.13 Stormwater Management System

The USET facility is designed and built to minimize the potential release of hazardous waste or hazardous waste constituents to the air, soil, or surface water. The CSB is totally enclosed. The

building floor is more than four (4) feet above the grounds of the site to allow loading and unloading directly from truck to warehouse and from warehouse to truck. The building roof overhangs ten feet out over the loading and unloading docks.

Many features have minimized the potential of stormwater contacting hazardous waste or hazardous waste constituents. The 10-foot roof overhang reduces the amount of stormwater in the loading and unloading area. All waste managed in the loading and unloading area is in closed containers. Currently, an extra precautionary design of the facility is a stormwater filtration system. It should be noted that this system is not a required by this permit and is included for information purposes only.

The loading and unloading area is constructed of concrete and asphalt materials. The surface is sloped to a containment trench. The containment trench runs from the north loading and unloading area to the south accumulation sump. All stormwater from the loading and unloading area flows to the 640-gallon concrete sump through the containment trench. The accumulated stormwater is pumped from the sump through a sand filter, two (2) carbon filters, and then to the stormwater drain where it flows (by gravity) to the stormwater retention pond.

The pump remains off during waste management operations with a potential of release of hazardous waste or hazardous waste constituents. When these operations (such as loading or unloading) are complete, the area, stormwater and stormwater systems are inspected. Unsatisfactory conditions (if any) are corrected prior to turning the pump on to activate the system. These inspections are also conducted daily (each operating day) as indicated the USET Inspection Plan.

The retention pond has dimensions of 126 feet x 35 feet with an average volume of 0.1335 acrefeet and a slope of 3:1. The pond retains filtered stormwater. Non-filtered stormwater from roof drains also discharges into the pond. The stormwater containment trenches and sump are constructed of concrete. The holding sump has a capacity of 640 gallons. The sump pump can pump 30-40 gallons per minute.

The sand filter has 3.1 square feet of filter area in a fiberglass wrapped shell. The sand filter can accommodate flow rates of 20-62 gallons per minute. The sand filter is an efficient means of filtering out potential solids, oils and greases. The sand in the sand filter system typically lasts for many years and is changed out as required. The filter can be back flushed when the filter pressure is high or the flow rate is restricted. Back flushed materials will be managed as either solid or hazardous waste depending upon the waste characterization.

The carbon filter consists of two 55-gallon drum/carbon filters. Each filter contains 200 pounds of activated carbon, which provides approximately three minutes of contact time at 20 gallons per minute. The filter is an effective means of filtering potentially toxic (organic and metal) constituents. The carbon is replaced at least annually. Documentation of filter carbon replacement is included in the facility operating record. USET may increase the amount of sand or carbon if it becomes necessary. More frequent changing will occur if breakout or breakthrough is detected. The spent carbon will be managed as solid or hazardous waste (depending upon the waste characterization) if it is not returned to the manufacturer for regeneration.



# **ATTACHMENT 2**

Volume 3 of 3, Appendix O: Hazardous & Solid Waste Closure Plans & Supporting Documentation

# INTRODUCTION / APPLICABILITY

This closure plan has been completed in accordance with 40 Code of Federal Regulations (CFR), Part 264, Subpart G. The plan outlines closure requirements for the permitted Container Storage Building (CSB), Waste Processing Building (WPB), 10-day Transfer Facility, and Bulk Container Storage Area (BCSA) at the US Ecology Tampa, Inc. (USET) facility. No other RCRA regulated units are located onsite.

The USET financial assurances discussed below will cover the permitted hazardous waste treatment, storage, and disposal facility (TSDF) operations as required by 40 CFR 264 Subpart H and the 10-day transfer facility.

The maximum permitted facility-wide hazardous waste storage capacity is summarized in the table below. Storage at the USET facility occurs in containers only.

MAXIMUM HAZARDOUS WASTE STORAGE CAPACITY BY AREA								
Building/Storage Area	Location at Facility	Capacity						
CSB <sup>1</sup> , ISCA <sup>2</sup> , I/O <sup>3,7</sup> Staging Area, Low Explosive Magazine, and CPCP <sup>4,8</sup>	2002 N. Orient Road, 7202 E. 8th Avenue, and Parking Lot West of Office Building	50,000 gallons						
WPB⁵	7202 E. 8th Avenue, West of Office Building	9,900 gallons						
10-day Transfer Area	7202 E. 8th Avenue, Parking Lot West of Office Building	20,000 gallons or 100 CY						
BCSAs <sup>6</sup>	Parking Lot, South of E. 9th Avenue, North and West of Office Building	800 CY						
Total Ex	cisting Hazardous Waste Storage Capacity:	79,900 gallons + 800 CY						

#### NOTES:

- 1. CSB = Container Storage Building
- 2. ISCA = Improved Secondary Containment Area
- 3. I/O = Inbound/Outbound Staging Area
- 4. CPCP = Consumer Products Consolidation Platform
- 5. WPB = Waste Processing Building
- 6. BCSAs = Bulk Container Storage Areas
- 7. The inbound staging area capacity of 20,000 gallons is not included in the 50,000-gallon total capacity; the outbound staging area capacity is a part of the 50,000-gallon total capacity.
- 8. The 2,000-gallon storage capacity for the CPCP is included in the 50,000-gallon total capacity.

# WASTE CHARACTERIZATION

Indicated below are the waste characterizations of the various waste streams managed at the USET facility. Actual waste analysis information (if available), waste profile information, supporting lab analytical, QC lab reports, manifests, land ban forms, and the USET computer database information will be retained as part of the facility operating record.

1

<sup>&</sup>lt;sup>1</sup> 40 CFR 261.30 indicates the basis for listing the classes or types of wastes listed in 40 CFR 261 Subpart D.

Ignitable Waste (I)

Physical State: Liquid/Solid/Semi-Solid

Chemical Composition: Flammable Liquids: Solvents, paints, thinners, alcohols, fuels,

oils, etc.

Flammable Solids: water-reactive metals, phosphorous, paint

sludges, and solid residues, etc.

Oxidizers: permanganates, nitrates, nitrites, perchlorates, etc.

Disposal: Off-site via fuel blending, deactivation, and/or incineration.

Other Data: Stored in an explosion-proof designed area.

Oxidizers must be kept separate from organics.

Corrosive Waste (C)

Physical State: Liquid/Solid/Semi-Solid

pH: Less than 2.0 and greater than 12.5

Chemical Composition: Acids: Hydrochloric, nitric, chromic, phosphoric, sulfuric, etc.

Caustics: Sodium hydroxide, potassium hydroxide, etc.

Disposal: Off-site via neutralization. Alternately, some, or all, of the

acceptable materials may be treated on-site in the treatment tank located in the WPB and disposed of at a subtitle D landfill once

decharacterized, meets LDRs, and passes the PFT.

Other Data: Keep acids and caustics separated from each other and do not add

water to acids or caustics.

Reactive Waste (R)

Physical State: Liquid/Solid/Semi-Solid

Chemical Composition: Cyanides, sulfides, and water-reactive metals, etc.

Disposal: Off-site via deactivation, and/or incineration.

Other Data: Stored in an explosion-proof designed area.

Cyanides and sulfides must be kept separate from acids.

Water reactives are usually immersed in kerosene or mineral oil.

Toxicity Characteristic Waste (E)

Physical State: Liquid/Solid/Semi-Solid

Chemical Composition: D004 - D043 wastes.

Disposal: Off-site via stabilization, incineration, or landfill. Alternately,

allowable waste codes may be treated in the treatment tank and disposed of at a Subtitle D facility once decharacterized, meets

LDRs, and passes the PFT.

## Acute Hazardous Waste (H)

Physical State: Liquid/Solid/Semi-Solid

Chemical Composition: Arsenics, carbamates, endrin, lindane, toxaphene, methoxychlor,

etc.

Disposal: Off-site via incineration, stabilization/oxidation and/or Subtitle C

facility.

Other Data: May be an inhalation hazard.

Toxic Waste (T)

Physical State: Liquid/Solid/Semi-Solid

Chemical Composition: Acetone, Acetyl Chloride, Acrylonitrile, Aniline, Azaserine, etc.

Disposal: Off-site via incineration, fuel blending, stabilization/oxidation

and/or Subtitle C facility.

Other Data: May be an inhalation hazard.

# **CLOSURE PERFORMANCE STANDARDS**

USET plans to continue operating the facility as long as it is a viable business activity, both economically and environmentally. There are currently no plans to stop waste management or processing activities or close the facility. This closure plan is provided to plan, prepare, and secure financial assurances so that closure can be completed when necessary.

Closure of the USET facility will be done in a manner that minimizes the need for further care. All hazardous waste and hazardous waste constituents will be properly managed at closure so that post closure care and post closure potential for releases of hazardous waste or hazardous waste constituents are eliminated. The closure plan complies with the requirements of 40 CFR 264 Subpart G. It is the intent of this plan to protect human health and the environment from any release of hazardous materials or constituents.

Closure and the closure cost estimates provided herein are based upon Republic Services Industrial Services division managing, completing, and conducting all closure activities.

#### FINAL CLOSURE ACTIVITIES

Final closure activities will include the removal of all hazardous waste and hazardous waste constituents from the facility for shipment to permitted treatment and disposal facilities. Final closure also includes the decontamination of all equipment, the inside floors and walls of the CSB and WPB, the containment sumps, and the loading/unloading areas (the paved area from the building to five feet out and the outside of the warehouse dock wall from the ground up to the floor level).

The facility land, office, and decontaminated CSB and WPB will require no post closure care. Upon the completion of final closure, the facility will then be available for commercial use.

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## **MAXIMUM WASTE INVENTORY**

A maximum total of 50,000 gallons of hazardous waste from the CSB, 20,000 gallons or 100 cubic yards of hazardous waste from 10-day Transfer Facility, 9,900 gallons of hazardous waste from the WPB, and 800 cubic yards of waste will require shipment off-site to treatment or disposal facilities at closure. A maximum facility waste inventory is summarized below:

MAXIMUM WASTE INVENTORY SUMMARY									
Waste Materials									
Flammable Liquids	7,810 Gallons	3,225 Gallons	0 Gallons	0 Gallons	11,035 Gallons				
Oxidizers	6,655 Gallons	825 Gallons	0 Gallons	0 Gallons	7,480 Gallons				
Reactives & Flammable Solids	2,370 Gallons	825 Gallons	0 Gallons	0 Gallons	3,195 Gallons				
Poisons	6,765 Gallons	2,640 Gallons	0 Gallons	0 Gallons	9,405 Gallons				
Corrosives - Alkaline	6,765 Gallons	1,210 Gallons	2,238 Gallons	0 Gallons	10,213 Gallons				
Corrosives - Acid	6,765 Gallons	1,540 Gallons	3,025 Gallons	0 Gallons	11,330 Gallons				
Other Hazardous Waste (Liquids)	6,760 Gallons	5,005 Gallons	2,400 Gallons	0 Gallons	14,165 Gallons				
Other Hazardous Waste (Solids)	6,110 Gallons	4,730 Gallons	2,237 Gallons	0 Gallons	13,077 Gallons				
Treated HW (Bulk Containers)	0 Cubic Yards	0 Cubic Yards	0 Cubic Yards	800 Cubic Yards	800 Cubic Yards				
Inventory Totals (Gallons)	50,000 Gallons	20,000 Gallons	9,900 Gallons	0 Gallons	79,900 Gallons				
Inventory Totals (Cubic Yards)	0 Cubic Yards	0 Cubic Yards	0 Cubic Yards	800 Cubic Yards	800 Cubic Yards				

#### **CLOSURE ITEMS**

The facility hazardous waste inventory will be consolidated as much as possible based upon waste hazard class, compatibility, and treatability. Compatible hazardous waste liquids may be pumped to tankers for outbound shipment to ultimate treatment and disposal facilities. Compatible hazardous waste solids may be consolidated to bulk containers for outbound shipment to ultimate treatment and disposal facilities.

# WASTE INVENTORY

The maximum waste inventory summarized above to be disposed of at the time of facility closure is discussed by waste class in the following subsections.

#### Flammable Liquids

A maximum total (from TSDF and transfer operations combined) of 11,035 gallons of waste flammable liquids will be on hand at the time of facility closure. Flammable liquids will be removed and transported to a permitted fuel blending facility (or equivalent) for disposal by a hazardous waste transporter within a maximum of twenty (20) days.

## **Oxidizers**

A maximum total (from TSDF and transfer operations combined) of 7,480 gallons of waste oxidizers will be on hand at the time of facility closure. Oxidizers will be removed and transported to a permitted hazardous waste treatment and disposal facility by a hazardous waste transporter within a maximum of twenty (20) days.

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## Flammable Solids/Reactives

A maximum total (from TSDF and transfer operations combined) of 3,195 gallons of flammable solids and reactive wastes will be on hand at the time of facility closure. Flammable solids and reactive wastes will be removed and transported to a permitted hazardous waste treatment facility or incinerator (or equivalent) for disposal by a hazardous waste transporter within a maximum of ten (10) days.

#### **Poisons**

A maximum total (from TSDF and transfer operations combined) of 9,405 gallons of poisons will be on hand at the time of facility closure. Poisonous waste will be removed and transported to a permitted incinerator (or equivalent) for disposal by a hazardous waste transporter within a maximum of twenty (20) days.

## **Corrosives**

A maximum total (from TSDF and transfer operations combined) of 21,543 gallons of waste corrosives will be on hand at the time of facility closure. Corrosive waste will be removed and transported to a permitted treatment facility (or equivalent) for disposal by a hazardous waste transporter within a maximum of thirty (30) days.

## Other Hazardous Waste

A maximum total (from TSDF and transfer operations combined) of 27,242 gallons and 800 cubic yards of characteristic waste will be on hand at the time of facility closure. These other hazardous wastes (such as listed plating sludges, toxic metals, and characteristic D002, D004-011, and D018-043 TC, and Universal wastes) will be removed and transported to a permitted hazardous waste treatment/disposal facility (or equivalent) or incinerator (or equivalent) for disposal by a hazardous waste transporter within a maximum of ten (10) days.

As discussed above, USET has no current plans to stop hazardous waste management and processing activities at the facility and, therefore, the incinerator-related timeframes discussed in the above subsections do not take into consideration the current national situation. However, USET does recognize the current temporary national backlog of containerized hazardous waste requiring incineration at RCRA permitted hazardous waste incinerators. This situation has caused many hazardous waste generators, including USET, difficulty in locating an appropriate destination facility that will take their waste within regulatory mandated accumulation time limits. Should facility closure become necessary at a time when the national backlog of incinerator waste is ongoing, USET will seek regulatory options available to them including the use of a temporary authorization and/or permit modification to increase the facility storage capacity or requesting an accumulation time limit extension from the FDEP to address the "unforeseen, temporary, and uncontrollable circumstances."

#### **OTHER ITEMS**

The following items will also be addressed at the time of facility closure.

## **Empty Containers**

All empty containers resulting from the bulking of material will be sent to a drum recycling or metal reclamation facility. These facilities will pick up the empty containers at the USET facility at no charge and, therefore, no change in the closure cost estimate is necessary.

The empty containers will not meet the criteria for classification as an acutely toxic waste and, therefore, will not require triple rinsing. Any empty containers from acutely toxic waste will be managed as hazardous waste or triple rinsed with the resulting rinsate managed as hazardous waste.

# **Equipment**

Most of the equipment necessary for decontamination and closure will already be owned by USET. Equipment requiring decontamination may include a forklift, an excavator, a front-end loader, a drum/rag compactor, a paint can crusher, and a RUNI screw compactor.

## **DECONTAMINATION & CONFIRMATORY SAMPLING**

The CSB is totally enclosed and constructed of poured concrete and concrete block with containment. The transfer loading and unloading area is concrete and paved with sloped and diked containment. Loading and unloading of waste is direct from trailer to warehouse and direct from warehouse to trailer.

The WPB is partially enclosed with corrugated metal panels. The WPB floor is constructed of poured concrete providing containment. All loading and unloading are conducted within sloped and diked containment.

The floors and sumps within the CSB and WPB will be decontaminated by steam cleaning. The CSB inner walls will be decontaminated three feet up from the floor. The loading/unloading area will then be decontaminated. The loading/unloading area to be decontaminated includes the dock exterior wall from the ground up to the CSB warehouse floor level and the paved ground from the building to out five feet. All generated rinsate will be properly containerized for offsite disposal at a permitted hazardous waste treatment facility.

Process equipment will then be cleaned with water, solvent, or both and the resultant rinsate liquids containerized for offsite disposal at a permitted hazardous waste treatment facility. Equipment decontamination will be performed on the paint can crusher, excavator, front end loader, drum/rag compactor, forklift, and RUNI screw compactor. Other equipment onsite is small enough that it could be drummed and managed offsite as hazardous waste (worst case), if necessary.

A minimum of four (4) samples of rinsate liquids will be taken and analyzed to confirm that all washed areas and equipment are sufficiently decontaminated and determine offsite disposal arrangements for these liquids. Laboratory analysis of these samples will include full TCLP, 624, 8240, and 8260 which covers all characteristic wastes as well as many solvents.

All decontamination activities will be completed by Republic Services Industrial Services division, and it is estimated that up to six weeks will be required to decontaminate the USET facility and associated equipment.

# Confirmatory Soil Sampling - CSB

Soil sampling will be performed at four (4) locations around the CSB as follows:

1. One (1) soil sample will be taken from the stormwater retention pond located adjacent to the CSB. Unless there is direct knowledge or evidence that a release occurred from the CSB operations into the pond, contamination detected in this site feature could be from other onsite or surrounding area sources. If this is the case, then the assessment and cleanup of contamination that is discovered will be addressed under a HSWA corrective action

completed in accordance with the requirements of Chapter 62-780, F.A.C. rather than under the closure activities discussed herein.

- 2. One (1) soil sample will be collected upgradient from the northeast corner of the CSB.
- 3. One (1) soil sample will be collected downgradient from the southeast corner of the CSB.
- 4. One (1) soil sample will be collected from under the CSB.

The four (4) soil samples collected will be submitted for laboratory analysis of full TCLP, 624, 8240, and 8260 which covers all characteristic wastes as well as many solvents.

Additional soil samples may be taken in areas with visual evidence of contamination and under the CSB or in sumps if there are visible cracks or indications that contamination could have migrated into soils and/or groundwater.

# <u> Confirmatory Soil Sampling – WPB</u>

Soil sampling will be performed at four (4) locations around the WPB as follows:

- 1. One (1) soil sample will be taken from the stormwater retention pond located adjacent to the WPB. Unless there is direct knowledge or evidence that a release occurred from the WPB operations into the pond, contamination detected in this site feature could be from other onsite or surrounding area sources. If this is the case, then the assessment and cleanup of contamination that is discovered will be addressed under a HSWA corrective action completed in accordance with the requirements of Chapter 62-780, F.A.C. rather than under the closure activities discussed herein.
- 2. One (1) soil sample will be collected upgradient from the northeast corner of the WPB.
- 3. One (1) soil sample will be collected downgradient from the southeast corner of the WPB.
- 4. One (1) soil sample will be collected from under the WPB.

The four (4) soil samples collected will be submitted for laboratory analysis of full TCLP, 624, 8240, and 8260 which covers all characteristic wastes as well as many solvents.

Additional soil samples may be taken in areas with visual evidence of contamination and under the WPB or in sumps if there are visible cracks or indications that contamination could have migrated into soils and/or groundwater.

# CLOSURE COST ESTIMATE - CONTAINER STORAGE BUILDING

A disposal cost estimate based on the maximum CSB waste inventory discussed herein that will be on hand at the time of facility closure, as well as a cost estimate for the decontamination and other related closure activities associated with the CSB operations are presented in the following tables.

Please note that unit costs used in developing the waste disposal estimates for the facility presented in this closure plan are based on an average 12-month cost between 2022 to 2023 charged by disposal contractors used by USET.

CSB WASTE DISPOSAL CLOSURE COST SUMMARY								
Waste Materials	Waste Materials Disposal Volume Units Disposal Cost Units							
Flammable Liquids	142	Drums	\$	86.40	Drums	\$	12,269	
Oxidizers	121	Drums	\$	478.80	Drums	\$	57,935	
Reactives & Flammable Solids	44	Drums	\$	722.52	Drums	\$	31,791	
Poisons	123	Drums	\$	372.60	Drums	\$	45,830	
Corrosives - Alkaline	123	Drums	\$	150.00	Drums	\$	18,450	
Corrosive - Acid	123	Drums	\$	159.60	Drums	\$	19,631	
Other Hazardous Waste (Liquids)	123	Drums	\$	199.80	Drums	\$	24,575	
Other Hazardous Waste (Solids)	110	Drums	\$	115.56	Drums	\$	12,712	
Other Hazardous Waste (Roll-Offs)	0	Tons	\$	195.00	Tons	\$	-	
Treated Non-Hazardous Waste (Roll-Offs)	0	Tons	\$	30.49	Tons	\$	-	
CSB Waste Disposal Cost Total =							223,192	

CSB DECONTAMINATION CLOSURE COST SUMMARY									
Work Item / Description	Co	Cost Estimate							
Clean CSB & ICSA - 7,672 Sq. Ft. (Floor & Sumps)	34	Hours	\$	400	\$	13,600			
Clean/Decon Small Equipment, Pumps, Tools, Hand Trucks	4	Hours	\$	400	\$	1,600			
Rinsate Analysis	2	Samples	\$	1,000	\$	2,000			
Rinsate Disposal/Treatment	4,000	Gallons	\$	2	\$	6,000			
Misc. Equipment Rental	2	Days	\$	1,500	\$	3,000			
Mobilization & Demobilization	2	Days	\$	2,500	\$	5,000			
Soil Sample Analysis	4	Samples	\$	1,000	\$	4,000			
Engineering Inspections, Sampling & Closure Certification	1.5	Each	\$	12,000	\$	18,000			
	\$	53,200							

## CLOSURE COST ESTIMATE - WASTE PROCESSING BUILDING

Closure of the WPB operations will consist of the removal of 9,900 gallons of hazardous waste, the hazardous waste treatment tank, the reactives magazine, remaining reagents used for the treatment of characteristically hazardous waste, and the non-hazardous waste solidification unit. Costs for closure of the non-hazardous waste solidification unit are provided in the solid waste closure plan which is also included in **Appendix O**. Accordingly, the narrative discussion and cost estimates presented below address the closure of the hazardous waste operations in the WPB.

The maximum cost for closure of the hazardous waste treatment tank would occur if it was filled with material to be treated, or material that had been partially treated, at the time of facility closure. This assumption was made in calculating the WPB closure cost estimate. Labor cost is included for emptying the contents of the tank. After removal of the contents, the tank will be cleaned internally and externally with a high-pressure steam rinse and the accumulated rinsate transferred into containers pending analysis to determine ultimate disposal requirements. Rinsate disposal costs are based on the assumption of generating 0.5 gallons per sq. ft. Based on the nature of the hazardous wastes treated in the tank, laboratory

analysis of the rinsate samples will be limited to corrosives and metals. The tank will then be allowed to air dry after which it will be cut into manageable sections and shipped offsite for recycling as scrap metal. In this instance, the scrapped tank material will fall under the scrap metal exemption in 40 CFR 261.4(a)(13) and will not be considered a solid waste under RCRA. Additionally, coincident with removing the contents of the tank, reagents used for the treatment of characteristically hazardous waste in the tank remaining in the WPB will be properly disposed of offsite. For closure cost estimating, offsite disposal of a total of 40 tons of unused reagents is assumed.

Once the hazardous waste treatment tank is removed, the interior and exterior of the reactives magazine will be decontaminated and the floor of the WPB, including sumps, will be steam cleaned with the generated rinsate collected and transferred into containers pending the analysis of collected samples to determine ultimate disposal requirements. Cleaning and decontamination of miscellaneous equipment will also occur at this time. Laboratory analysis of the rinsate samples will include full TCLP, 624, 8240, and 8260 which covers all characteristic wastes.

The WPB consists of an approximately 8-inch-thick concrete slab. Other than as discussed under the confirmatory sampling section above, no provision has been made in the closure cost estimate for the sampling of soils beneath the building to determine if there has been a release to the subsurface. Further, estimates have not been provided for additional cleaning and potential removal of the upper surface of the concrete slab and treatment of the resulting debris.

At facility closure, the FDEP will be requested to tour the WPB and a joint determination will be made with USET as to whether soil sampling or concrete cleaning will be required based on evidence of spills, cracks in the slab, or other means by which the slab may have been compromised that would justify subgrade soil sampling. Should such additional testing or cleaning be required, the contingency funding determined based on the combined facility closure cost estimate discussed below will be available for this purpose.

WPB WASTE DISPOSAL CLOSURE COST SUMMARY									
Waste Materials	Disposal Volume	Units	Dis	posal Cost	Units	Co	st Estimate		
Flammable Liquids	0	Drums	\$	86.40	Drums	\$	-		
Oxidizers	0	Drums	\$	478.80	Drums	\$	-		
Reactives & Flammable Solids	0	Drums	\$	722.52	Drums	\$	-		
Poisons	0	Drums	\$	372.60	Drums	\$	-		
Corrosives - Alkaline	41	Drums	\$	150.00	Drums	\$	6,150		
Corrosive - Acid	55	Drums	\$	159.60	Drums	\$	8,778		
Other Hazardous Waste (Liquids)	44	Drums	\$	199.80	Drums	\$	8,791		
Other Hazardous Waste (Solids)	40	Drums	\$	115.56	Drums	\$	4,622		
Other Hazardous Waste (Treatment Tank)	40	Tons	\$	195.00	Tons	\$	7,800		
Other Hazardous Waste (Roll-Offs)	0	Tons	\$	195.00	Tons	\$	-		
Treated Non-Hazardous Waste (Roll-Offs)	0	Tons	\$	30.49	Tons	\$	-		
WPB Waste Disposal Cost Total =									

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WPB DECONTAMINATION CLOSURE COST SUMMARY								
Work Item / Description	Quantity	Unit		Rate		ost Estimate		
Disposal of Unused Reagents (Transportation & Disposal)	40	Tons	\$	200	\$	8,000		
Remove Contents of Treatment Tank (9,000 Gallons)	4	Hours	\$	400	\$	1,600		
Steam Clean & Pump Out Treatment Tank (Inside & Out) - 1,152 Sq. Ft.	8	Hours	\$	400	\$	3,200		
Dismantle Tank for Scrap/Recycling (4-Man Crew)	32	Hours	\$	800	\$	25,600		
Clean Reactive Magazine - 264 Sq. Ft. (Floor, Roof & Inside)	2	Hours	\$	400	\$	800		
Clean WPB - 8,050 Sq. Ft. (Floor & Sumps)	36	Hours	\$	400	\$	14,400		
Clean/Decon Small Equipment Pumps, Filters, Hand Trucks	4	Hours	\$	400	\$	1,600		
Rinsate Analysis	2	Samples	\$	1,000	\$	2,000		
Rinsate Disposal/Treatment	5,000	Gallons	\$	2	\$	7,500		
Misc. Equipment Rental	4	Days	\$	1,500	\$	6,000		
Mobilization & Demobilization	2	Days	\$	2,500	\$	5,000		
Soil Sample Analysis	4	Samples	\$	1,000	\$	4,000		
Engineering Inspections, Sampling & Closure Certification	1.5	Each	\$	12,000	\$	18,000		
WPB Decontamination Cost Total =								

# **CLOSURE COST ESTIMATE – 10-DAY TRANSFER FACILITY**

A disposal cost estimate based on the maximum 10-day transfer facility waste inventory discussed herein that will be on hand at the time of facility closure is presented in the following table.

10-DAY TRANSFER FACILITY WASTE DISPOSAL CLOSURE COST SUMMARY									
Waste Materials	Waste Materials Disposal Volume Units Disposal Cost Units						Cost Estimate		
Flammable Liquids	59	Drums	\$	86.40	Drums	\$	5,098		
Oxidizers	15	Drums	\$	478.80	Drums	\$	7,182		
Reactives & Flammable Solids	15	Drums	\$	722.52	Drums	\$	10,838		
Poisons	48	Drums	\$	372.60	Drums	\$	17,885		
Corrosives - Alkaline	22	Drums	\$	150.00	Drums	\$	3,300		
Corrosive - Acid	28	Drums	\$	159.60	Drums	\$	4,469		
Other Hazardous Waste (Liquids)	90	Drums	\$	199.80	Drums	\$	17,982		
Other Hazardous Waste (Solids)	86	Drums	\$	115.56	Drums	\$	9,938		
Other Hazardous Waste (Roll-Offs)	0	Tons	\$	195.00	Tons	\$	-		
Treated Non-Hazardous Waste (Roll-Offs)	0	Tons	\$	30.49	Tons	\$	-		
	10-Day Transfer Facility Waste Disposal Cost Total =								

# CLOSURE COST ESTIMATE – BULK CONTAINER STORAGE AREA

A disposal cost estimate based on the maximum bulk container storage area waste inventory discussed herein that will be on hand at the time of facility closure is presented in the following table.

BCSA WASTE DISPOSAL CLOSURE COST SUMMARY								
Waste Materials	Waste Materials Disposal Volume Units Disposal Cost Units						t Estimate	
Flammable Liquids	0	Drums	\$	86.40	Drums	\$	-	
Oxidizers	0	Drums	\$	478.80	Drums	\$	-	
Reactives & Flammable Solids	0	Drums	\$	722.52	Drums	\$	-	
Poisons	0	Drums	\$	372.60	Drums	\$	-	
Corrosives - Alkaline	0	Drums	\$	150.00	Drums	\$	-	
Corrosive - Acid	0	Drums	\$	159.60	Drums	\$	-	
Other Hazardous Waste (Liquids)	0	Drums	\$	199.80	Drums	\$	-	
Other Hazardous Waste (Solids)	0	Drums	\$	115.56	Drums	\$	-	
Other Hazardous Waste (Roll-Offs)	984	Tons	\$	195.00	Tons	\$	191,880	
BCSA Waste Disposal Cost Total =								

## **CLOSURE COST ESTIMATE – WASTE TRANSPORTATION**

A waste transportation cost estimate for the combined USET facility operations based on the maximum waste inventory discussed herein that will be on hand at the time of facility closure is presented in the following table.

WASTE TRANSPORTATION COST SUMMARY								
Waste Materials Disposal Volume Units Loads Cost per Load								
Flammable Liquids	201	Drums	3	\$	3,500	\$	10,500	
Oxidizers	136	Drums	2	\$	9,000	\$	18,000	
Reactives & Flammable Solids	59	Drums	1	\$	3,500	\$	3,500	
Poisons	171	Drums	2	\$	3,500	\$	7,000	
Corrosives - Alkaline	186	Drums	2	\$	9,000	\$	18,000	
Corrosive - Acid	206	Drums	3	\$	9,000	\$	27,000	
Other Hazardous Waste (Liquids)	257	Drums	3	\$	3,500	\$	10,500	
Other Hazardous Waste (Solids)	236	Drums	2	\$	4,300	\$	8,600	
Other Hazardous Waste (Roll-Offs)	1,024	Tons	64	\$	4,000	\$	256,000	
	Waste Transportation Cost Total =							

# **CLOSURE COST ESTIMATE - COMBINED FACILITY OPERATIONS**

A summary of the closure cost estimates presented in the above sections for the combined USET facility operations is presented in the following table. A 10% contingency based on the subtotal for the combined

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facility operations has been added to the total combined facility closure cost estimate. This contingency is considered industry standard and adequate for unanticipated activities that may be encountered during final facility closure.

TOTAL COMBINED FACILITY CLOSURE COST SU	JMN	MARY
Container Storage Building Waste Disposal Closure Cost =	\$	223,192
Container Storage Building Decontamination Closure Cost =	\$	53,200
Waste Processing Building Waste Disposal Closure Cost =	\$	36,142
Waste Processing Building Decontamination Closure Cost =	\$	97,700
10-Day Transfer Facility Waste Disposal Closure Cost =	\$	76,691
Bulk Container Storage Area Waste Disposal Closure Cost =	\$	191,880
Waste Transportation Closure Cost =	\$	359,100
Closure Cost Subtotal =	\$	1,037,905
Contingency @ 10% =	\$	103,790
TOTAL COMBINED FACILITY CLOSURE COST =	\$	1,141,695

## FINANCIAL ASSURANCE

Total cost of closure for the combined USET facility operations is currently estimated to be \$1,141,695. The current surety bond, dated July 1, 2023, and requisite liability insurance in favor of the State of Florida, dated June 30, 2023, underwritten for the USET facility is provided in **Appendix P.** This documentation demonstrates USET's current compliance with Rule 62-730.300(2)(b), F.A.C. and 40 CFR Part 264.147 or 265.147, as adopted by reference in Section 62-730.180, F.A.C. Annual updates and supporting documentation will be provided by the end of the first quarter of each succeeding calendar year.

#### **CLOSURE SCHEDULE**

As discussed previously, USET plans to continue operating the facility as long as it is a viable business activity, both economically and environmentally, and there are currently no plans to stop waste management or processing activities or close the facility. Nonetheless, in the event that closure is necessary, a schedule is discussed in this section and a list of tasks to be completed during final closure of the USET facility is indicated below:

1.	Final Waste Acceptance	15 Days	
2.	Processing Complete	21 Days	
3.	Offsite Disposal Shipments Complete	30 Days	
4.	Facility Decontamination Complete	45 Days	
5.	Soil Sampling and Analysis Complete	60 Days	
6.	Final Date of Facility Closure	90 Days	
7.	Closure Certification	60 Days	
	Total	time required to close facility 180 Days	:

USET will notify the FDEP in writing at least 45 days prior to the date on which final facility closure is expected to begin. This date will be no more than 30 days after the receipt of the final volume of hazardous

waste at the facility. Hazardous waste will be removed from the facility within 90 days of receiving the final volume of hazardous waste. Facility closure activities will be completed within 180 days of receiving the final volume of hazardous waste. Closure certification will be provided within 60 days of the final closure of the USET facility as discussed further below.

## **CLOSURE CERTIFICATION**

Certification of the closure activities completed at the USET facility will be conducted by an independent third-party professional engineer (PE) licensed in the State of Florida. Prior to the implementation of this closure plan, USET and the PE will meet with the FDEP to discuss the details of the plan. Based upon new regulations and/or guidance or policy issues, the closure plan may need to be amended and/or updated prior to implementation in accordance with the requirements of 40 CFR 264 Subpart G.

As indicated below, it is anticipated that three onsite inspections at the USET facility will be completed by the PE during the closure period to ensure that all waste disposal and facility closure activities are being completed in accordance with the plan.

- First Inspection Final date of waste acceptance.
- Second Inspection After all wastes are shipped to offsite disposal facilities.
- Third Inspection Upon completion of facility decontamination activities and the FDEP final inspection.

Upon completion of the final inspection by the PE and within 60 days of the final closure of the USET facility, a certification that the facility has been closed in accordance with this closure plan will be submitted to the FDEP and the USEPA Regional Administrator. Documentation supporting the closure certification will be included in this submittal and it will be signed by both the PE and an authorized USET representative.

The USET facility has no disposal units and, therefore, no survey or post closure care will be required.

## INTRODUCTION / APPLICABILITY

USET plans to operate the solid waste facility as long as it is a viable business activity, both economically and environmentally. There are currently no plans to stop solid waste management or processing activities or close the facility. However, in keeping with Section 62-701.710(6), Florida Administrative Code (F.A.C.), this closure plan is provided to plan, prepare, and secure financial assurances so that closure can be completed when necessary.

Closure is based upon Republic Services Industrial Services division managing, completing, and conducting all closure activities. The facility will require no post-closure care. Upon the completion of final closure, the facility will then be available for commercial use.

## WASTE DISPOSAL & DECONTAMINATION

Facility closure activities to be completed will include the removal of non-RCRA regulated solid wastes from the site, proper decontamination of facility equipment, and proper disposal of waste rinsate produced during decontamination activities. Solid waste and rinsate removal will consist of offsite shipment to properly permitted treatment and disposal facilities.

Roll-offs, sludge boxes, and dump trailers use disposable liners and; therefore, no cleaning will be required; however, the liners will be properly disposed. Forklifts, drum handlers, most box trailers and box vans, drum scales, and air compressors do not contact waste and, therefore, will not require cleaning. Diaphragm pumps, drum pumps, the sand filter, and the carbon filter will require a simple flush or backwash. The decontamination of these items will produce rinsate that will be properly containerized, sampled, and disposed of offsite once final arrangements are completed.

Items that contact waste will require cleaning and decontamination. These items will be cleaned with a pressure washer and the generated rinsate will be properly containerized, sampled, and disposed of offsite once final arrangements are completed. These items will include skid mount tanks, the backhoe/loader, and the non-hazardous waste solidification unit.

A pressure washer and suitable cleaning solution will be employed to clean floors/pavements and sumps at the facility. The areas to be decontaminated will include the Waste Processing Building (WPB) and the Solid Waste Operations Area located on the 8<sup>th</sup> Avenue property and the Staging Area located on the Orient Road property. The rinsate generated from cleaning these areas will be properly containerized, sampled, disposed of offsite once final arrangement are completed. To determine the associated toxicity of the liquid waste generated during facility and equipment decontamination activities, samples will be collected and analyzed for appropriate parameters determined in accordance with the nature of the waste managed onsite.

These decontamination procedures are required to create safe equipment that can be removed from the facility and used again following closure. It is the intent of this plan to protect human health and the environment during facility closure activities.

## **CLOSURE SCHEDULE**

USET will notify the FDEP in writing at least 45 days prior to ceasing operations and will specify a date on which final facility closure is expected to begin. In no case will solid waste be received at the facility after the stated closing date. Within 30 days after receiving the final solid waste shipment USET will

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# US ECOLOGY TAMPA, INC. SOLID WASTE OPERATIONS FACILITY CLOSURE PLAN

remove or otherwise dispose of all solid waste or residue offsite in accordance with 62-701.710(6)(b), F.A.C.

Facility closure will be completed within 180 days after receiving the final solid waste shipment in accordance with 62-701.710(6)(c), F.A.C. The FDEP will make an inspection within 30 days to verify the closure and advise USET of the facility closure status. Upon determination of the facility closure status, a certification of closure will be prepared and submitted to the FDEP as discussed further below.

#### CLOSURE CERTIFICATION

Certification of the closure activities completed at the USET facility will be conducted by an independent third-party professional engineer (PE) licensed in the State of Florida. Prior to the implementation of this closure plan, USET and the PE will meet with the FDEP to discuss the details of the plan. Based upon new regulations and/or guidance or policy issues, the closure plan may need to be amended and/or updated prior to implementation.

Upon completion of the FDEP inspection and within 60 days of the final closure of the USET facility, a certification that the facility has been closed in accordance with this closure plan will be submitted to the FDEP. Documentation supporting the closure certification will be included in this submittal and it will be signed by both the PE and an authorized USET representative.

#### **CLOSURE COST ESTIMATE**

A closure cost estimate has been developed for the USET facility in accordance with 62-701.630(3), F.A.C. Total closure cost for the USET facility is estimated at \$192,924 including sampling, analysis, loading, transportation, disposal, decontamination, labor, and certification. To provide a worst-case scenario, the total inventory at the facility has been assumed to be liquid waste. A contingency representing 10 percent of the calculated closure costs is also included in the total cost estimate. A closure cost summary is provided on the following page and copies of supporting vendor quotes provided at the end of **Appendix O**. Inflationary increases, as approved by the FDEP, may be made to this cost estimate annually.

# FINANCIAL ASSURANCE

The current surety bond, effective July 1, 2023, is provided in **Appendix P** and documents USET's current compliance with 62-701.710(7), F.A.C. Annual updates and supporting documentation will be provided by the end of the first quarter of each succeeding calendar year.

# US ECOLOGY TAMPA, INC. SOLID WASTE OPERATIONS FACILITY CLOSURE PLAN

LABOR COSTS						
	Capacity in	Square	Rinsate	Labor		
Operational Area	Gallons	Footage	Generated	Hours	Labor Cost @ \$210/h	
Pumps and Filters			280	6	\$1,260	
/ehicles and Equipment			3,000	30	\$6,300	
Staging Area 1,2	35,200	9,158	4,579	41	\$8,610	
Naste Processing Building 1,2	180,410	8,050	4,025	36	\$7,560	
Solid Waste Operations Area 1,2	20,200	2,288	0	0	\$0	
	235,810	19,496	11,884	113.0	\$23,730	
NASTE ON-SITE						
	gallons (	solids) 3	gallons (lic	quids) 3		
-	0		247,694		•	
	tons 4	hours labor	labor cost @	) \$210/hr		
Bulk roll off loading @ 1 hr labor / 20 tons loaded	0	0	\$0		•	
ANALYTIC COSTS						
ANALITIC COSTS	tons 4	# complex	Co	male cost	@ \$900/comple	
Solid composite sample @ 1 sample / 110 tons	0	# samples 0			@ \$800/sample \$0	
	gallons	# samples	Sample cost @ \$		@ \$800/sample	
Liquid composite sample @ 1 sample / 20,000 gallons	247,694	14	\$11,200		1,200	
		Total Ana	llytical Cost =	\$11,200		
TRANSPORTATION AND DISPOSAL COSTS						
			<u>ASSUMPTIONS</u>			
-	tons	cost	-			
T & D of solids @ \$1.80 / ton	0	\$0			s based on generating	
T & D of Liquids @ \$0.50/gallon (235,810 gallons + 11,844 gallons rinsate)	gallons 247,694	cost \$123,847	_ 0.5 gallons pe		er square foot.	
Total T & D Cos		\$123,847	<sup>2</sup> Labor hours are based on cleaning 225 square feet per hou			
Equipment Rental =				cleaning 2	.25 square leet per flour	
Mobilization & Demobiliztion =		\$4,500	<sup>3</sup> For worst-case scenario, the tota inventory is assumed to be liquid.			
Closure certification =		\$10,000		iiiveiiloiy i	is assumed to be liquid.	
Subtotal Closure Cost ** =			TOTIS - (Waste galloris) (0.54			
10% contingency = Total Closure Cost =			39 lb/gallon) / (2000 lb/ton)			

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#### **September 27, 2023**

#### PROJECT PROPOSAL

**Customer: PACSCON** 

**Contact:** Christopher B. Poole, PG, CPG, President

**Phone #:** 813-447-9433

Email: cpooe@pacscon.com Address: 4517 George Road

Suite 220

Tampa, Florida 33634

Proposal Sent Via: Email

Dear Christopher:

Cliff Berry, Inc. (CBI) has been offering comprehensive Environmental Services for over five decades by combining proven technical expertise and problem-solving proficiency. We have supported our customers in developing cost effective solutions for all of their environmental requirements.

Cliff Berry, Inc. (CBI) is pleased to provide you with a personalized pricing proposal to execute the following Scope of Work referenced below:

Scope of Work: U.S. Ecology Closure Costs.

**Project Cost Estimate** 

DESCRIPTION	UNIT COST	QUANTITIES*
Vacuum Truck & Driver (Portal to Portal) (Regular Rates)	\$130.00	Per Hour
Vacuum Truck & Driver (Portal to Portal) (Overtime Rates)	\$162.00	Per Hour
High Powered Vacuum Truck & Driver (Portal to Portal) (Regular Rates)	\$220.00	Per Hour
High Powered Vacuum Truck & Driver (Portal to Portal) (O/T Rates)	\$254.00	Per Hour
Technician, Service Vehicle & Pressure Washer (Portal to Portal) Reg RT	\$178.50	Per Hour
Technician, Service Vehicle & Pressure Washer (Portal to Portal) O/T RT	\$210.00	Per Hour
Transportation & Disposal of Non-Haz Solid Wastes (Bulk - 4 Ton Min)	\$150.00	Per Ton
Liquids Disposal (Non-Hazardous)	\$0.50	Per Gallon
Solids-Sludge's (Non-Hazardous)	\$1.80	Per Gallon

<sup>\*</sup>These are Estimated Quantities and could be greater.

Work Location: U.S. Ecology, 7202 East 8th Ave, Tampa, Florida 33619

### Standard Terms & Conditions:

- 1. Once the project has been accepted and confirmed to CBI for execution, we shall schedule this project on a mutually agreeable date with a minimum of five (5) business days' lead-time.
- 2. Projects performed on an emergency basis or without the requested five (5) days' notice may incur overtime rates due to after-hours, weekend, or holiday work or mobilization time from other CBI locations.
- 3. CBI's work hours are based on a Monday thru Friday 0700 1500 workweek. If weekend work and/or second/third shift work is required and authorized, overtime rates will be charged at one and a half straight time rates and double on observed government holidays.

- 4. All waste is subject to Profile Approval from the certified disposal facility and will be manifested (actual quantity), transported and disposed of in accordance with all Federal, State and Local regulations.
- 5. Any waste accepted that is not in compliance with approved profile will be communicated with the customer within 72 hours of receipt. Pricing adjustments will be applied where applicable.
- 6. It is the customer's responsibility for payment of any unforeseen tariffs, fees, taxes, and unexpected administrative costs which CBI may incur in the execution of this project. Any additional fee(s) shall be indicated as a separate line item on the final invoice.
- 7. A Fuel Surcharge will be added to all invoices in accordance with the "National Average Diesel Fuel Index".
- 8. A signed Purchase Order, Job Authorization Form or this Proposal is acknowledging agreement with the terms and conditions of this document and is required prior to job commencement.
- 9. Any demurrage charges that are NOT caused by CBI's field personnel shall be billed to the customer.
- 10. This estimate applies only to the job described above. This pricing does not include additional materials or labor that may be required due to any unforeseen problems that may arise once the project has begun. If additional labor and equipment is required, it will be invoiced at "Time & Material" rates.
- 11. This proposal is an estimate based on limited known conditions. If the scope of work changes CBI, reserves the right to adjust its fee schedule as required.
- 12. \*Payment is CASH IN ADVANCE unless otherwise approved in advance by CBI's credit department.
- 13. The above rates are based on a (4) hour minimum.
- 14. Transportation charges are portal to portal.
- 15. Pricing is valid for (30) days from the date of this proposal.

### Supplemental Conditions:

- 1. Pricing is based on estimated days and availability of equipment at the time of scheduling.
- 2. The pricing for treatment and disposal is based on profile approval.
- 3. CBI will require unimpeded access to the work site delivery area.

CBI is committed to preserving our environment and combined with decades of documented work experience. It is our personal commitment to you that we shall execute this work with the highest degree of professionalism and environmental stewardship. All CBI field personnel are certified with 40-Hour OSHA training and are Confined Space Entry certified.

Cliff Berry, Inc. would like to thank you for the opportunity to submit pricing for this project. If you require additional details on this scope of work, please do not hesitate to contact me at any time.

Sincerely,

### Thomas C. Nicolaos

Thomas Nicolaos
Corporate Account Manager
Tampa, Florida
Mobile: 813-334-1046
<a href="mailto:tnicolaos@cliffberryinc.com">tnicolaos@cliffberryinc.com</a>

Company Representative (signature)	Title	
Company Representative (print)	Date	

PS: Please sign and return this project proposal at your earliest convenience so that we may verify our master schedule and confirm to you the exact time and date of the work to be performed.



Phone: 386-672-5668 Fax: 386-673-4001



Quote Prepared for:

**PACSCON** 5230 Land O' Lakes Blvd. #1574 Land O' Lakes, FL 34639

USA

Chris Poole (813) 447-9433

cpoole@pacscon.com

Pace® Contact Information

Account Executive Project Manager

Megan Lantry

megan.lantry@pacelabs.com

**Project Information** 

Quote Name 00146320 - PACSCON-US Ecology Created Date 9/20/2023

Closure-092023 **Expiration Date** 12/31/2023

Quote Number 00146320 Report Level ||

Standard TAT: 7 Business Days EDD Requirements: STD

**Project Location** FL Certification

Requirements

**Payment Information** 

Customer Accounts Christopher Poole

Payable Contact:

Customer Accounts accounting@pacscon.com

Payable Email:

Credit Application Credit Approved

Approved?

Payment Terms: 30 Days

Payment Term 5.26.2023

Details:

Is P.O. Required for Yes

Payment?

### Minimum Laboratory Fee

\$250

### Quote Details

Quoto D	otano						
Quantity	Method	Matrix	Product	Line Item Description	Sales Price	Sub-Total	Total-Price
15.00	EPA 8260	Water Only	Volatile Organic Compounds (VOCs) (water)		\$77.00	\$1,155.00	\$1,155.00
15.00	EPA 8270	Water Only	Semi-Volatile Organics (full list SVOCs) (water)		\$198.00	\$2,970.00	\$2,970.00
15.00	EPA 8270 SIM	Water Only	Polynuclear Aromatic Hydrocarbons (PAH) (low level) (water)		\$72.00	\$1,080.00	\$1,080.00
15.00	EPA 8081	Water Only	Pesticides, Organochlorine (GC) (water)		\$61.00	\$915.00	\$915.00



Fax: 386-673-4001



15.00	EPA 8082	Water Only	Polychlorinated Biphenyls (PCBs) (water)		\$61.00	\$915.00	\$915.00
15.00	EPA 6010/7470	Water Only	Priority Pollutant Metals (13) (Sb, As, Be, Cd, Cr, Cu, Pb, Hg, Ni, Se, Ag, Tl, Zn) (water)		\$121.00	\$1,815.00	\$1,815.00
15.00	EPA 420.1	Water Only	Phenolics, Total (water)		\$33.00	\$495.00	\$495.00
15.00	EPA 335.4	Water Only	Cyanide, Total (water)		\$39.00	\$585.00	\$585.00
15.00	EPA 8260	Solid Only	Volatile Organic Compounds (VOCs) (soil)		\$77.00	\$1,155.00	\$1,155.00
15.00		Solid Only	Sampling Media	Terracore kits (if needed)	\$15.00	\$225.00	\$225.00
15.00	EPA 8270	Solid Only	Semi-Volatile Organics (full list SVOCs) (soil)		\$198.00	\$2,970.00	\$2,970.00
15.00	EPA 8270 SIM	Solid Only	Polynuclear Aromatic Hydrocarbons (PAH) (low level) (soil)		\$72.00	\$1,080.00	\$1,080.00
15.00	EPA 8081	Solid Only	Pesticides, Organochlorine (GC) (soil)		\$61.00	\$915.00	\$915.00
15.00	EPA 8082	Solid Only	Polychlorinated Biphenyls (PCBs) (soil)		\$61.00	\$915.00	\$915.00
15.00	EPA 6010/7471	Solid Only	Priority Pollutant Metals (13) (Sb, As, Be, Cd, Cr, Cu, Pb, Hg, Ni, Se, Ag, Tl, Zn) (soil)		\$121.00	\$1,815.00	\$1,815.00
15.00	EPA 420.1	Solid Only	Phenolics, Total (soil)		\$33.00	\$495.00	\$495.00
15.00	EPA 9012	Solid Only	Cyanide, Total (soil)		\$39.00	\$585.00	\$585.00
1.00			Environmental Impact Fee (Per Invoice)		\$25.00	\$25.00	\$25.00
30.00			Sample Disposal	per sample	\$6.00	\$180.00	\$180.00

Grand-Total \$20,290.00

### Additional Pricing Considerations:

If you have specific questions about any conditions noted below, please contact your Pace Analytical Representative.

- Unless accepted, signed and returned, or unless noted above, proposal expires 60 days from Created Date above.
- · Quoted prices include standard Pace Analytical QA/QC, reporting limits, compound lists and standard report format unless noted otherwise.
- If project specific MS/MSD samples are submitted, they may be billable.
- Volatile soils need to be frozen within 48 hours of collection. To facilitate this, they should be submitted to the lab within 40 hours of collection.
- TAT (Turn Around Time) is in working days unless otherwise specified above.
- To ensure requested TAT is available, please coordinate with your Pace Analytical representative at time of sample submittal.
- Any deviation from the above quoted scope of work, including sample arrival date and volume, may result in adjustment of prices.
- Please include Quote Number on Chain-of-custody to ensure proper billing.
- Pricing includes standard delivery of bottle/sample kits and coolers.
- · Charges will apply for non-standard shipping and for projects where shipping exceeds 10% of the total analytical costs of the shipment.
- All air and air-related equipment charges (i.e. rental fees for unused, unreturned or damaged equipment, are detailed in the Pace® Canister Use Policy
- PACE RESERVES THE RIGHT TO SURCHARGE ON CREDIT CARD PAYMENTS BASED ON CARD TYPE AND ZIP CODE.
- PACE RESERVES THE RIGHT TO PASS ALONG ALL EXPEDITED SHIPPING FEES. A MINIMUM FEE OF \$100 PER COOLER MAY BE APPLIED.

8 East Tower Circle Ormond Beach, FL 32174

Phone: 386-672-5668 Fax: 386-673-4001



Pace Anal	vtical	Terms	and	Conditions

These Standard Terms (Terms) govern all services that Pace Analytical \_ ("Lab") will perform on behalf of ("Client"), and supersede any other written provisions (including purchase/work orders) related to the services, as well as all prior discussions, courses of dealing, and/or performance, unless a separate, executed agreement for the same or similar services already exists between the Lab and Client (collectively "the Parties), or the Parties subsequently agree to terminate or amend these Terms, as allowed in Section 10 and 12, respectively.

#### 1. Definitions:

Chain of Custody (COC): A document evidencing the collection, handling, delivery, etc. of a sample or Sample Delivery Group Holding Time: The maximum amount of time a sample may be stored before being analyzed.

Sample Delivery Acceptance (SDA): The date and time when Lab officially receives a sample or Sample Delivery Group, as evidenced by either a notation on the Chain of Custody or an entry in the Lab's information management system (LIMS).

Sample Delivery Group (SDG): A set of samples normally shipped and reported to the Lab as a group.

Turnaround Time (TAT): The maximum allowable period within which Lab must report out its analytical testing results to Client, calculated from the date of SDA.

#### 2. Client's Obligations:

- a. To initiate Lab's services, Client must reference a quotation number (if applicable) and complete one of the following steps:
  - i. Submit a completed purchase order by:
    - 1. hand (i.e., in person)
    - 2. mail, or
    - 3. e-mail: or
  - ii. Place an order by:
    - 1. telephone
    - 2. e-mail. or
    - 3. delivering a sample (or SDG) to Lab and completing the COC
- b. Subject to occasional, mutually agreed-upon exceptions, Client must give five (5) days' prior notice for each sample delivery and provide the following information:
  - Name of the responsible project manager
  - Name of the person submitting the sample
  - iii. Name/location of collection site
  - iv. Date and time of collection
  - Specific testing being requested, and
  - vi. Sufficient details about reporting requirement(s).

#### c. Client shall also:

- Remain liable for any loss or damage to sample(s) until SDA (including that which may occur as a result of third-party shipping delays)
- ii. Pay all invoices in full on a net 30 basis or as otherwise agreed in writing
- iii. Notify Lab about any disputed charges or results within 30 days of receiving applicable invoice
- iv. Reimburse Lab for any costs\* related to delinquent payments
- Demonstrate its (or, if applicable, the Prime Client's) credit worthiness by accessing the following link: https://www.pacelabs.com/my-account.html and clicking on "Client Profile Information." (Note: Client must pre-pay for services pending completion of this process and Lab's approval of a credit line.)
- vi. Pay for any services it orders on any already analyzed sample
- vii. Obtain Lab's written consent before assigning billing or payment of Lab services to any third party, (failure to do so shall mean Client remains responsible for the payment of any outstanding balance)
- viii. Refrain from using any of Lab's supplies (e.g., containers) in connection with any non-Lab work
- ix. Ensure that any sample(s) containing any known hazardous substance is (are) labeled, packaged, manifested, transported, and delivered to Lab in accordance with all applicable regulations. (No SDA of any "high hazard" sample can occur without Lab's express permission.)
- Obtain Lab's prior written consent before publishing Lab's name and/or any data
- xi. Reimburse Lab for any out-of-scope services and related expenses (e.g., defending its analytical results or responding to a subpoena for documents and/or expert testimony)
- xii. Excuse Lab for any failure or delay in its performance caused by someone or something outside its control, e.g., a third party or "Force Majeure" event or circumstance, such as natural disasters or government shutdowns; and
- xiii. Accept responsibility for any claims, damages, losses, expenses\*, etc. to the extent caused by Client's: breach of these Terms; negligence or willful misconduct (includes Client's use of Lab data for anything other than the specific purpose for which it was intended), or violation of applicable laws.

#### 3. Lab's Obligations:

Lab shall:



Fax: 386-673-4001



- a. Perform its services in accordance with generally accepted analytical and environmental laboratory practices and professionally recognized standards.
- b. Identify on quotation if services will be sent to another Lab location or to a third party.
- c. Promptly notify Client of any:
  - i. Missing sample or otherwise compromised sample(s)
  - ii. Significant delays or other issues affecting Lab's services, or
  - iii. Subpoena or similar demand for Lab compliance
- d. Maintain high-quality services.
- e. Prepare and keep accurate records.
- f. Obtain/maintain any permit(s), license(s), or certification(s).
- g. Charge its fees on a net 30 basis (unless otherwise agreed).
- h. Impose a one and one half percent (1.5%) per month late charge on any unpaid balances.
- i. Assess a two and one half percent (2.5%) surcharge on any payments made by credit card. (Client can avoid this charge by paying with a debit card, an e-check/check by phone, a wire transfer, or an ACH payment.)
- j. Invoice Client for each sample or SDG as reported.
- k. Assume risk of loss or damage to any Client sample(s) upon SDA.
- I. Initiate analysis within established holding times so long as SDA occurred within 48 hours of collection or the first half of the maximum allowed holding time.
- m. Indemnify Client for any claims, damages, losses, expenses\*, etc. to the extent they were caused by Lab's breach of these Terms, negligence or willful misconduct, or the negligence and willful misconduct of persons for whom Lab is legally responsible.
- n. Warrant the results, with the express understanding that this warranty is exclusive and does not extend to any merchantability or fitness for a particular purpose.

#### 4. Lab's Discretionary Actions:

Lab may:

- a. Cease all services, including any release of data, if Client does not pay as agreed
- b. Reject or rescind any SDA if Lab decides sample poses any risk or hazard.
- c. Charge or bill Client directly for:
  - i. Any supplies (including containers) that are not used or returned
  - ii. Expedited outbound/return shipping for any sample that is not time-sensitive
  - iii. Disposal of any air samples that have not been reclaimed within seven (7) days of Lab's SDA thereof
  - iv. Disposal of any other sample not been reclaimed within 21 days of Lab's SDA thereof, or as otherwise required
  - v. A minimum fee for invoicing and/or handling any sample
  - vi. A sample that underwent SDA, but was not analyzed, at Client's direction
  - vii. Additional shipping and handling as deemed necessary
  - viii. Change in scope and/or rescheduling fees
  - ix. Minimum fees or additional surcharges as necessary
  - x. Reasonable attorneys' fees
  - xi. Project resampling related to missed deliveries, etc.
  - xii. Off cycle pricing increase dictated by the market
  - xiii. Any request for re-analysis following release of the report if the results are within the variability of the method (or acceptable parameters)
- d. Return unused portions of samples found or suspected to be hazardous to Client, at Client's cost.
- e. Retain Client's unreleased data and/or cancel Client's web portal access pending payment in full.
- f. Increase prices on an annual basis to support market-driven cost-increases.
- 5. Multiple Dilutions: Lab will report a single value for each analyte based on the most appropriate analysis or dilution for that analyte. Based on general screening where appropriate, samples will be reported on a dilution-only basis due to concentrations of target analytes present. Lab may attempt a 10-fold more concentrated analysis if practicable. Client may also request and pay for additional dilutions if practicable.
- 6. Dry Weight Correction / Percent (%) Moisture: Consistent with all applicable reporting methods, Lab will automatically analyze any solid sample (soil) for % moisture to allow for dry weight correction and charge accordingly. If "wet weight" reporting is requested by the client or the regulatory agency, Lab will maintain the charge for dry weight correction even if the results were not corrected for the applicable reporting criteria.
- 7. Confidentiality: The Parties agree that they will take all reasonable precautions to prevent the unauthorized disclosure of any proprietary or confidential information of each other and that they will not disclose such information except to those employees, subcontractors, or agents who have expressly agreed to maintain confidentiality.
- 8. Governing Law: These Terms shall be construed and interpreted pursuant to the laws of the State of Minnesota without giving effect to the principles of conflicts of law thereof.
- 9. Term: The Parties shall perform the services identified in the applicable purchase order or other agreement until completed or terminated



Phone: 386-672-5668 Fax: 386-673-4001



in accordance with Section 10 below

#### 10. Termination:

- a. Either party may terminate these Terms upon 30 days' prior written notice.
- b. Lab may immediately terminate for any breach by Client, including its failure to pay within 60 days of Lab's dated invoice.

#### 11. Limitation of Liability:

- a. If a court of competent jurisdiction finds that Lab failed to meet applicable standards and if Client suffers damages as a result, Lab's aggregate liability for its negligence or unintentional breach of contract shall not exceed the total fee paid for its services.
- b. This limitation shall not apply to any Client losses arising from Lab's negligence or willful misconduct, so long as Client:
  - i. Notifies Lab of any issue within thirty (30) days of receiving applicable invoice, and
  - ii. Allows Lab to defend its data, even to a regulatory agency that may have previously rejected same.
- c. Notwithstanding the foregoing, neither Lab nor Client shall be liable to the other for special, incidental, consequential, or punitive damages.
- 12. Amendment/Change Order: Any attempt to modify, vary, supplement, or clarify any provision of these Terms is of no effect unless reduced to writing and signed by both Parties.
- 13. Storage of Data: Following final report issuance, Lab will retain back-up data and final test reports for ten (10) years in a format from which the data and/or test report can be reproduced.
- 14. Intellectual Property: Lab shall retain sole ownership of any new method, procedure, or equipment it develops or discovers while performing services for Client pursuant to these Terms. Lab may, however, grant a license to the Client for its use of same.
- 15. Non-competition: Client shall not solicit or recruit any Lab personnel for at least 12 months following the termination of the services governed by these Terms.
- 16. Non-assignment: Neither party may assign or transfer any right or obligation existing under these Terms without prior written notice to the other party, except that Lab may freely transfer the services to another Lab location or, with Client's permission, subcontract the services to a third-party.
- 17. Insurance: Lab carries insurance with the limits of coverage as indicated below and will, upon Client's request, submit certificates of insurance showing same.
  - a. General Liability \$1,000,000 each occurrence; \$2,000,000 general aggregate;
  - b. Personal and Advertising Injury \$1,000,000;
  - c. Automobile Liability \$1,000,000 combined single limit;
  - d. Excess Liability Umbrella \$5,000,000 aggregate; \$5,000,000 each occurrence;
  - e. Worker's Compensation Insurance statutory limits; and
  - f. Professional Liability \$5,000,000 aggregate, \$5,000,000 per claim.

#### 18. Miscellaneous Provisions:

- a. In the absence of an executed agreement between the Parties, the SDA will constitute acceptance of these Terms by Client.
- b. The Parties may use and rely upon electronic signatures and documents for the execution and delivery of these Terms and any amendments, notices, records, disclosures, or other documents of any type sent or received in accordance with these Terms.
- c. The Parties are at all times acting and performing as independent contractors; neither one shall ever be considered an agent, servant, employee, or partner of the other.
- d. These Terms shall be binding upon, and inure to the benefit of, the Parties and their respective successors and assigns.
- e. Lab's compliance with a subpoena or other order shall not violate any requirement for confidentiality between the Parties.
- f. If any Term herein is invalidated or deemed unenforceable, it shall not affect the validity or enforceability of the other Terms.

IN WITNESS WHEREOF, Client and Lab have executed this Agreement through their duly authorized representatives as of the last date below:

Client]	
Sy:	_
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ïtle:	
Pate:	
Pace Analytical	
aco / mary noar	
\\.\.	
y:	_
lame:	
ïtle:	



8 East Tower Circle Ormond Beach, FL 32174 Phone: 386-672-5668 Fax: 386-673-4001

Date:		_		
*May include rea	asonable attorney's fees			
Quote Prepar	ed by:			
Prepared By	Olivia Studebaker	Email	olivia.studebaker@pacelabs.com	

New to Pace? Complete your Credit Application here! Scroll down to "Client Profile Information"



## **ATTACHMENT 3**

Professional Engineer Seal Pages

### **VOLUME 1 OF 3**

# **Permit Renewal Application**

FOR

Operation of a Hazardous Waste Treatment and Storage Facility

AT

7202 East 8<sup>th</sup> Avenue Tampa, Hillsborough County, FL

Permit Application No.: 34875-018-HO

Prepared for:



US Ecology Tampa, Inc. 7202 East 8<sup>th</sup> Avenue Tampa, FL 33619

Prepared by:



PACSCON GeoEnvironmental, Inc. 4517 George Road, Suite 220 Tampa, FL 33634

> Revision: 00 October 3, 2023 PACSCON No. 2023-1816

Revisi	on N	Jumb	er 00	
Date (	Octo	ber 3	3, 2023	3
Page	3	of	4	

### Professional Engineer Registered in Florida

Complete this certification when required to do so by Chapter 471, F.S., or when not exempted by Rule 62-730.220(9), F.A.C.

This is to certify that the engineering features of this hazardous waste management facility have been designed or examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgement, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature Francisco J. "Paco" Amram, P.E. Name (please type) Florida Registration Number 45133 Mailing Address 4517 George Road, Suite 220 Street or P.O. Box Tampa FL 33634 City State Zip E-mail address pamram@pacscon.com

Date October 3, 2023

Telephone (813) 503-6319

(PLEASE AFFIX SEAL)

Page 3 of 4

DEP Form 62-730.900(2)(d), incorporated in Rule 62-730.220(2)(a), F.A.C., Effective Date: 12/2019

### **VOLUME 2 OF 3**

# **Permit Renewal Application**

FOR

Operation of a Solid Waste Processing Facility

AT

7202 East 8<sup>th</sup> Avenue Tampa, Hillsborough County, FL

Permit Application No.: 34875-016-SO

Prepared For:



US Ecology Tampa, Inc. 7202 East 8<sup>th</sup> Avenue Tampa, FL 33619

Prepared By:



PACSCON GeoEnvironmental, Inc. 4517 George Road, Suite 220 Tampa, FL 33634 Engineering Business Registry No. 32162

> Revision: 00 October 3, 2023 PACSCON No. 2023-1816

#### C. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

Applicant:

The undersigned applicant or authorized representative of US Ecology Tampa, Inc.

is aware that statements made in this form and attached information are an application for a Solid Waste

Processing Facility 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 tragsfer of the permitted facility.

Signature of Applicant or Agent

Ken Dean

Name and Title (please type)

Environmental Compliance Manager

E-Mail address (if available)

7202 East 8th Avenue

Mailing Address

Tampa, FL 33619

City, State, Zip Code

813, 319-3433

Telephone Number

October 3, 2023

Date

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

 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.

Signature

Francisco J. "Paco" Amram, P.E.

Name and Title (please type)

4517 George Road, Suite 220

Mailing Address

Tampa, FL 33634

City, State, Zip Code

pamram@pacscon.com

E-Mail address (if available)

813, 503-6319

Telephone Number

October 3, 2023

Date

45133

Florida Registration Number (please affix seal)

DEP FORM 62-701.900(4) Effective [effective date]

### **VOLUME 3 OF 3**

## **Permit Renewal Application**

FOR

Operation of a Consolidated Hazardous and Solid Waste Facility

AT

7202 East 8<sup>th</sup> Avenue Tampa, FL 33619

Permit Application Nos.: 34875-016-SO & 34875-018-HO

Prepared for:



US Ecology Tampa, Inc. 7202 East 8<sup>th</sup> Avenue Tampa, FL 33619

Prepared by:



PACSCON GeoEnvironmental, Inc. 4517 George Road, Suite 220 Tampa, FL 33634

> Revision: 00 October 3, 2023 PACSCON No. 2023-1816





### **ATTACHMENT 4**

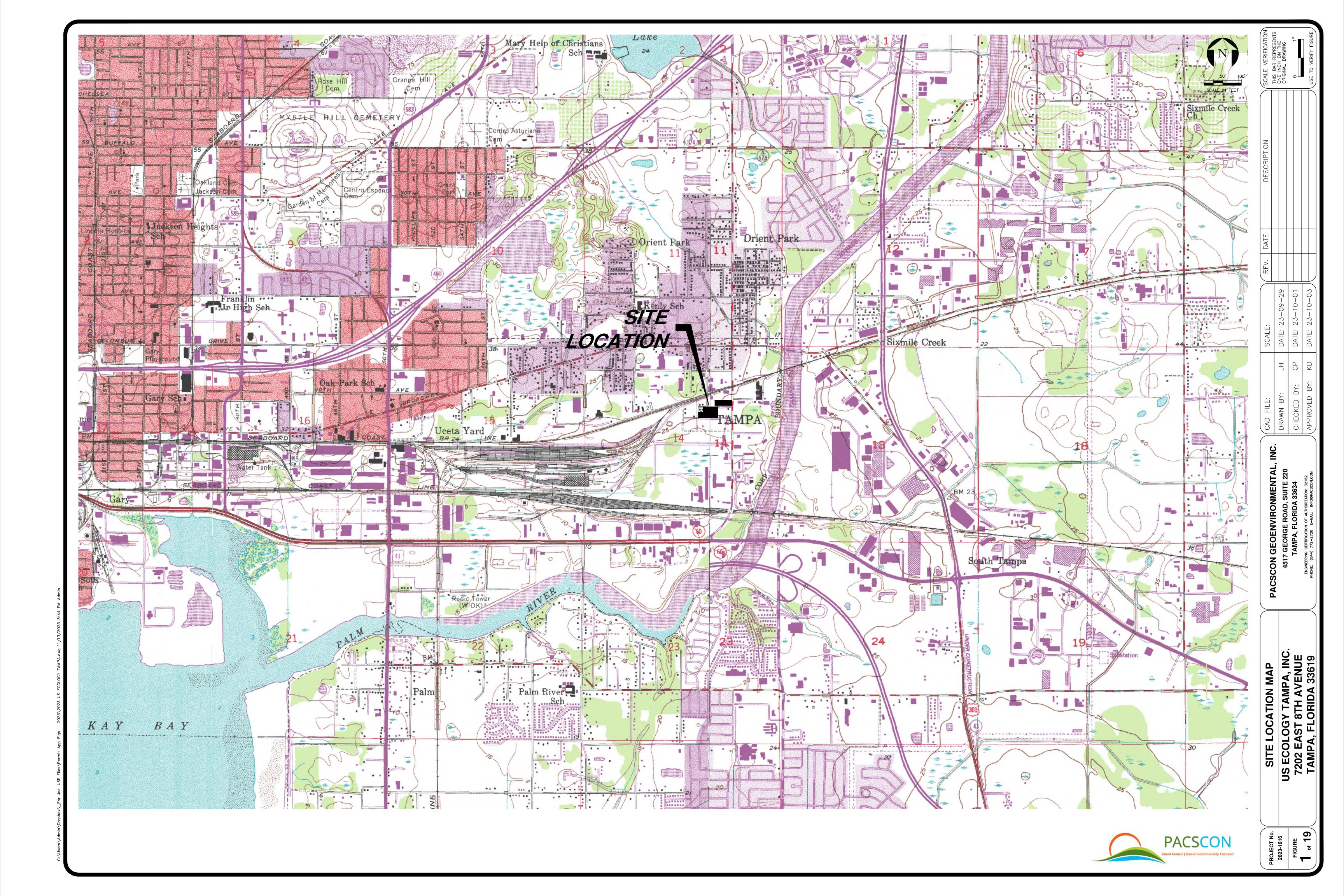
Figures (with dates added):

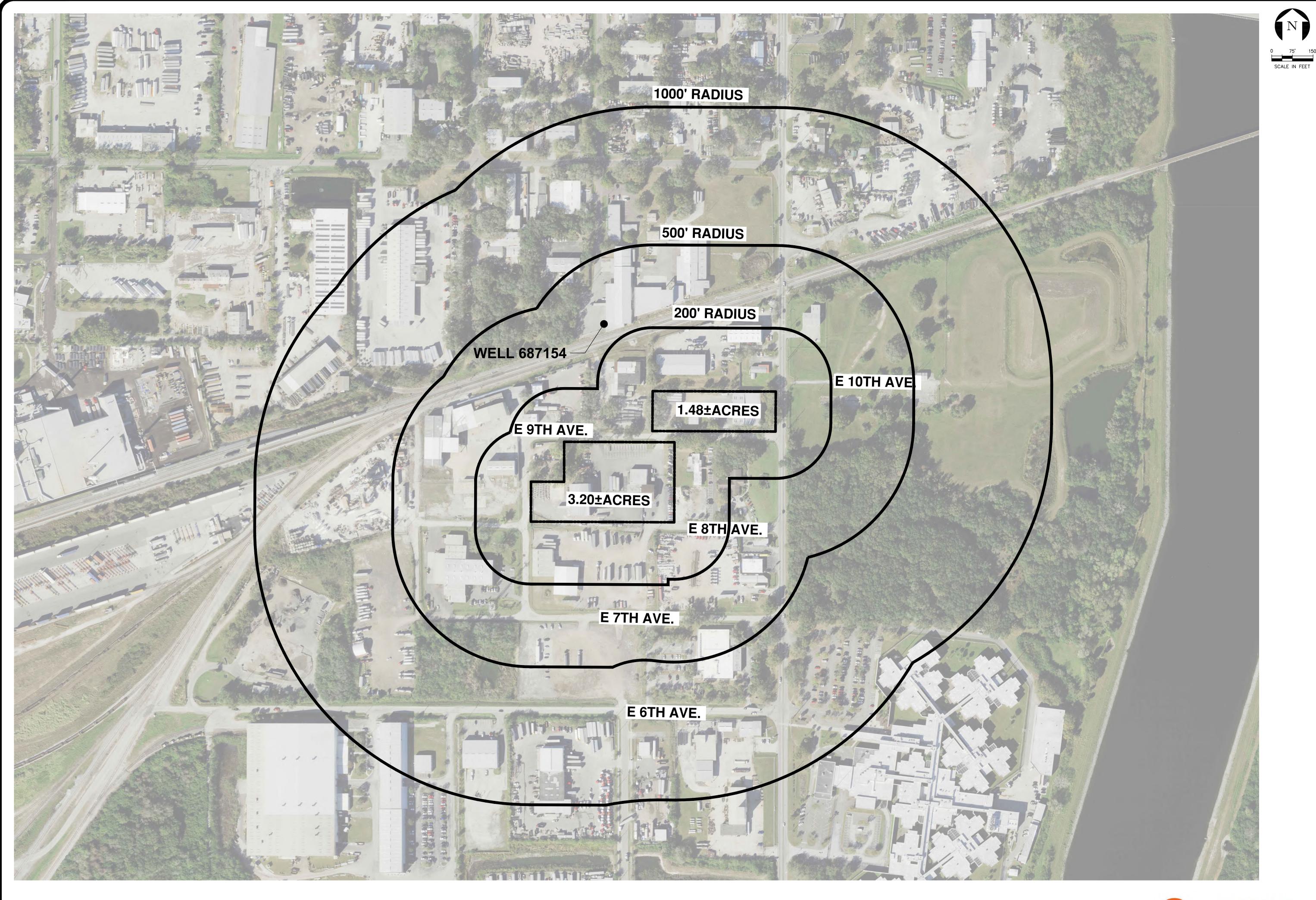
Set 1: for USET Appl. Vol. 3, Figures set.

Set 2: for Vol. 3's Appendix Q [Contingency Plan].



Volume 3 of 3 Figures 1 to 19

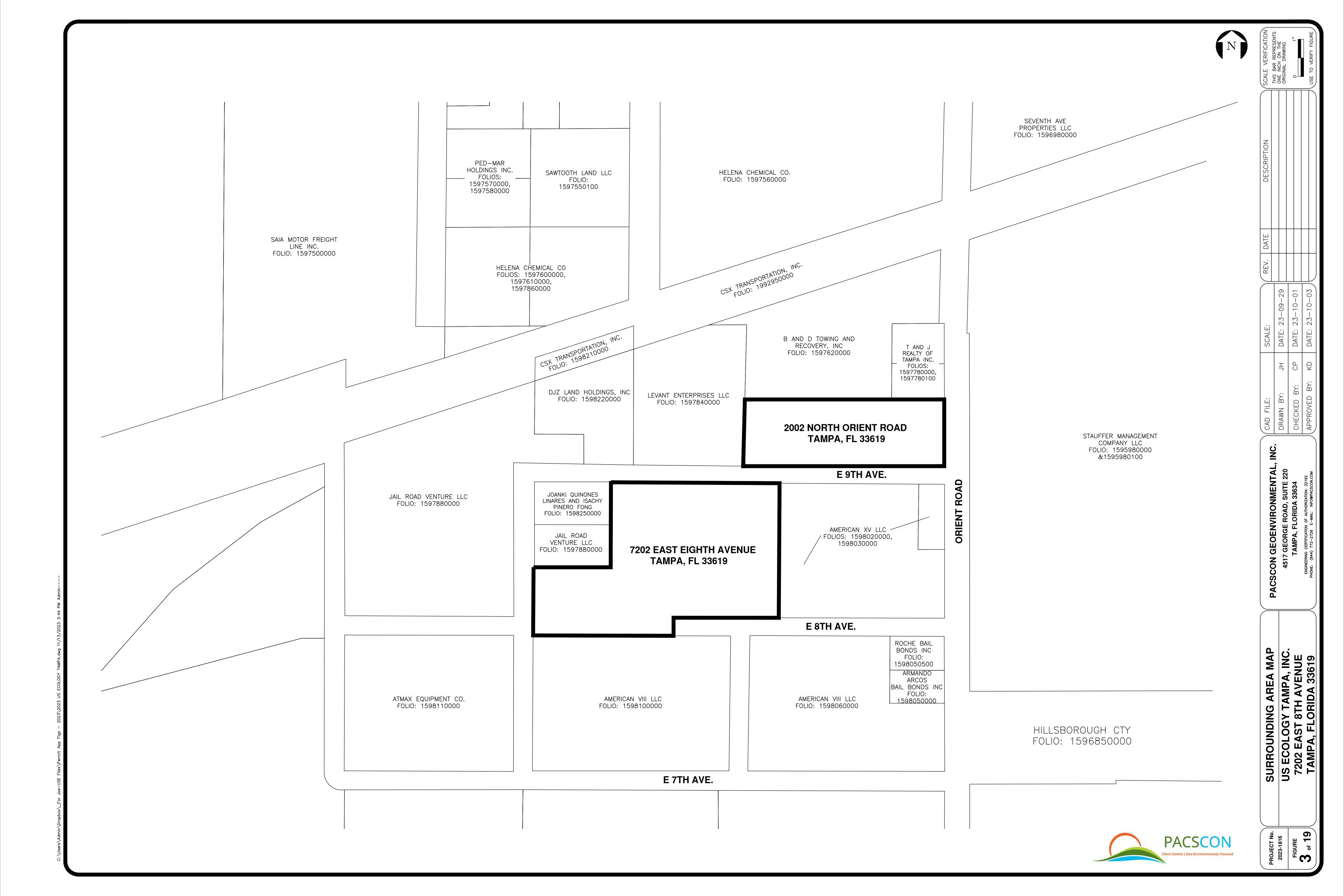






SITE AREA / LOCATION MAR US ECOLOGY TAMPA, INC. 7202 EAST 8TH AVENUE

PROJECT No. 2023-1816
FIGURE of 19



STATE READ OF

### **ZONING LEGEND:**

### SINGLE-FAMILY RESIDENTIAL DISTRICTS:

RS-150 RESIDENTIAL SINGLE FAMILY. RS-100 RESIDENTIAL SINGLE FAMILY. RS-75 RESIDENTIAL SINGLE FAMILY RS-60 RESIDENTIAL SINGLE FAMILY

RS-50 RESIDENTIAL SINGLE FAMILY

### MULTIPLE-FAMILY RESIDENTIAL DISTRICTS:

RM-12 RESIDENTIAL MULTIPLE-FAMILY. RM-16 RESIDENTIAL MULTIPLE-FAMILY. RM-18 RESIDENTIAL MULTIPLE-FAMILY. RM-24 RESIDENTIAL MULTIPLE-FAMILY. RM-35 RESIDENTIAL MULTIPLE-FAMILY. RM-50 RESIDENTIAL MULTIPLE-FAMILY. RM-75 RESIDENTIAL MULTIPLE-FAMILY.

### OFFICE DISTRICT:

RO RESIDENTIAL OFFICE. RO-1 RESIDENTIAL OFFICE. OP OFFICE PROFESSIONAL OP-1 OFFICE PROFESSIONAL.

### COMMERCIAL DISTRICT:

CN COMMERCIAL NEIGHBORHOOD. CG COMMERCIAL GENERAL. CI COMMERCIAL INTENSIVE.

> **INDUSTRIAL DISTRICT:** IG INDUSTRIAL-GENERAL IH INDUSTRIAL-HEAVY.

### M-AP MUNICIPAL AIRPORT COMPATIBILITY DISTRICT:

M-AP-1. M-AP-2. M-AP-3. M-AP-4.

### YBOR CITY HISTORIC DISTRICT:

YC-1 CENTRAL COMMERCIAL CORE. YC-2 RESIDENTIAL. YC-3 HILLSBOROUGH COMMUNITY COLLEGE. YC-4 MIXED USE DEVELOPMENT. YC-5 GENERAL COMMERCIAL YC-7 MIXED USE. YC-8 RESIDENTIAL. YC-9 SITE PLANNED CONTROLLED.

PP PUBLIC PARKS:

### CENTRAL BUSINESS DISTRICT (CBC):

CBD-1.

### PLANNED DEVELOPMENT:

PD PLANNED DEVELOPMENT. PD-A PLANNED DEVELOPMENT ALTERNATIVE.

UNIVERSITY COMMUNITY DISTRICT (U-C):

### CHANNEL DISTRICT (CD):

CD-1 CD-2 CD-3

**OZONING INFORMATION** LANDKMARK SITES 

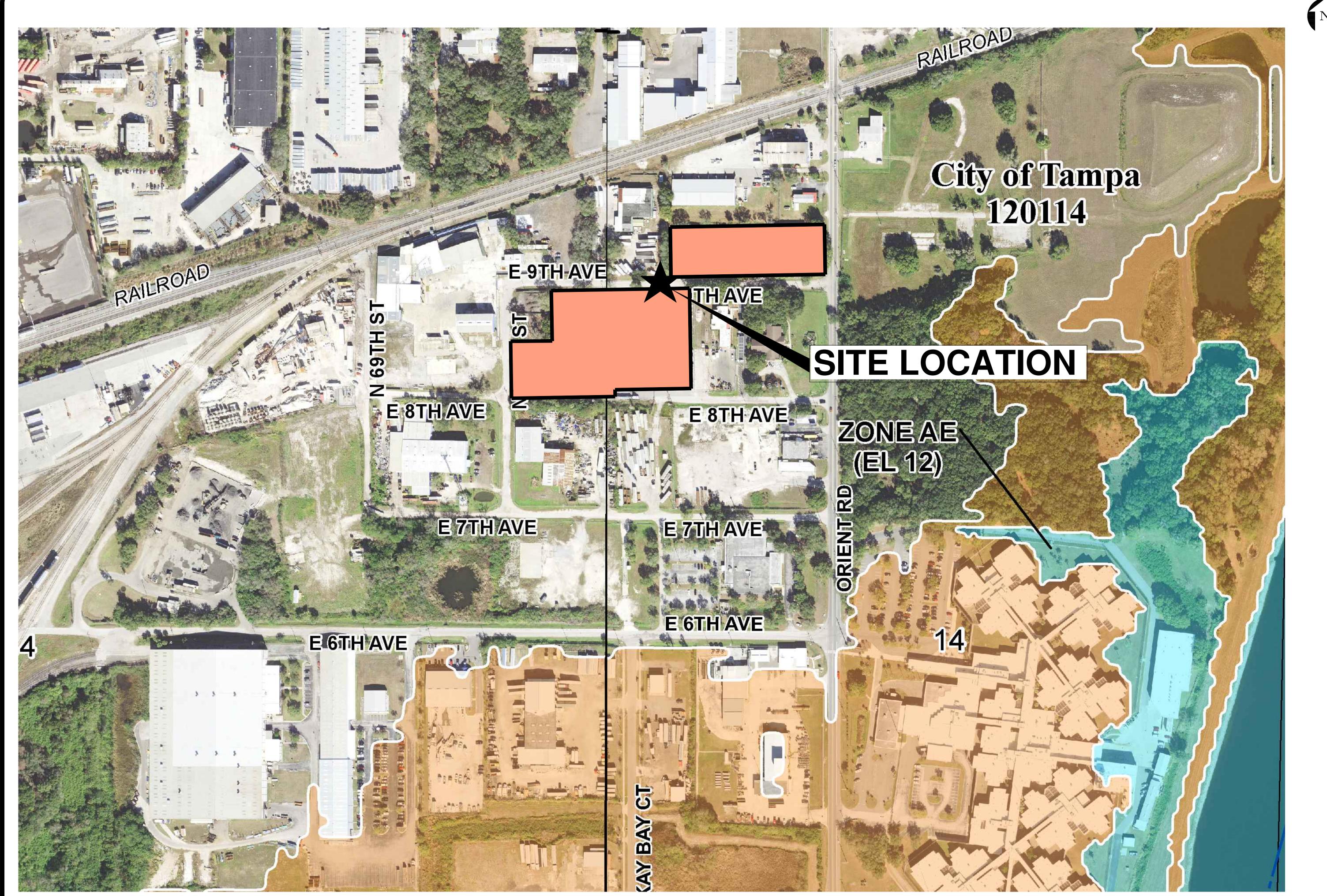


### NOT TO SCALE

THIS MAP IS SUBJECT TO REVISION AND INTERPRETATION AS PERMITTED BY CITY OF TAMPA CODE, CHAPTER 27, PRIOR TO MAKING ANY DECISION OR TAKING ANY ACTION BASED ON THE INFORMATION CONTAINED ON THIS MAP, IT IS HIGHLY RECOMMENDED THAT YOU CONTACT THE CITY OF TAMPA'S LAND DEVELOPMENT COORDINATION DIVISION AT 813-274-8403 FOR THE LATEST AND MOST UP TO DATE ZONING INFORMATION.

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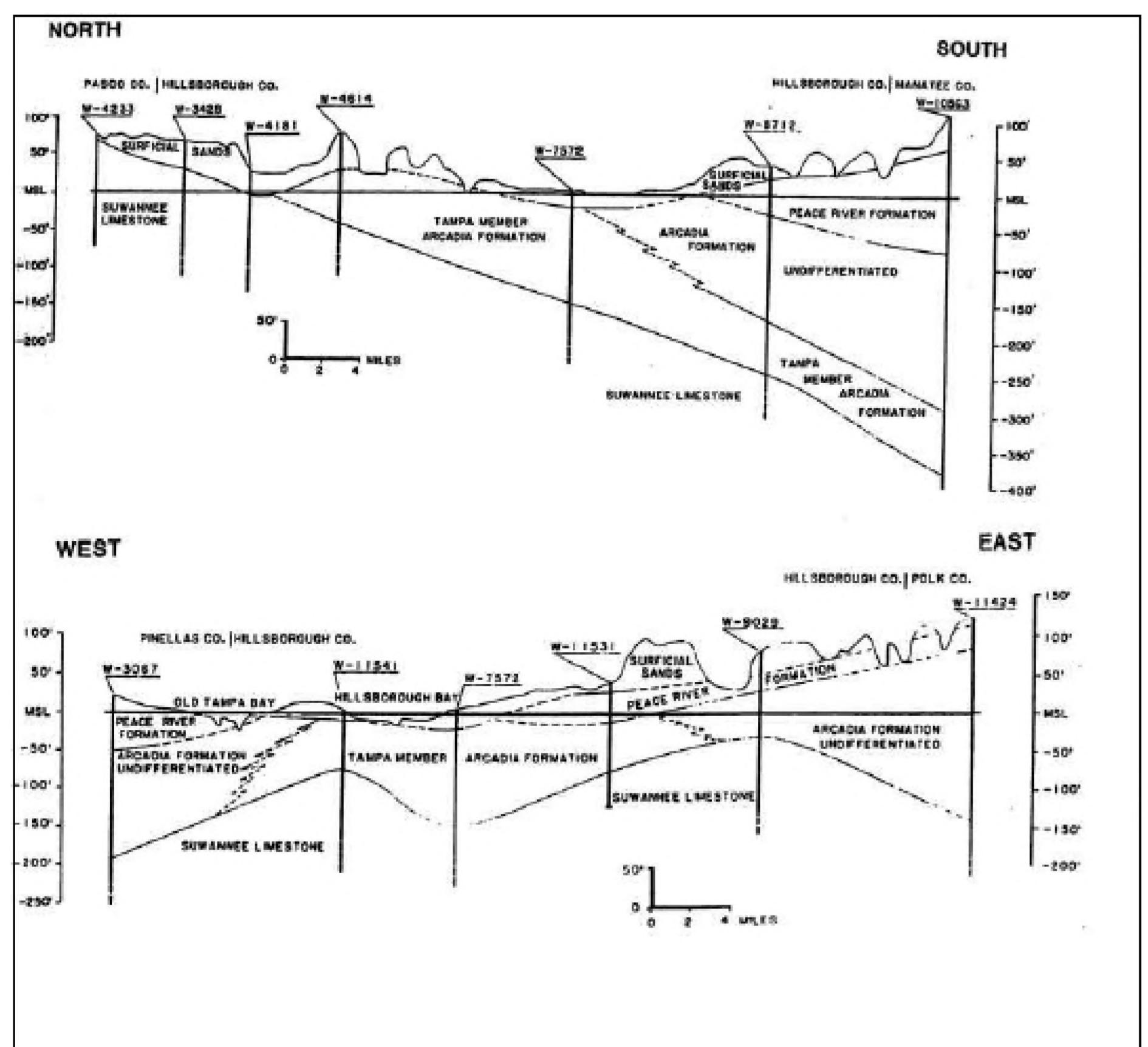


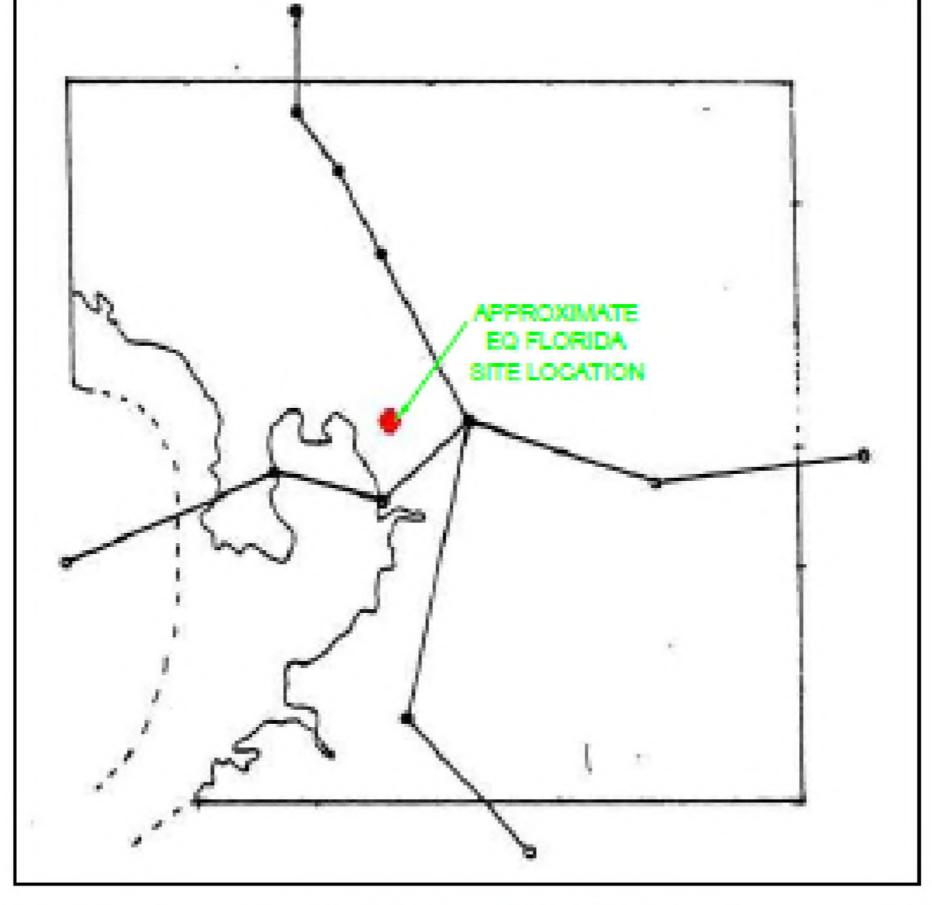


PACSCON GEOENVIRONMENTAL, I
4517 GEORGE ROAD, SUITE 220
TAMPA, FLORIDA 33634

COLOGY TAMPA, INC.
2 EAST 8TH AVENUE

23-1816 1GURE of 19





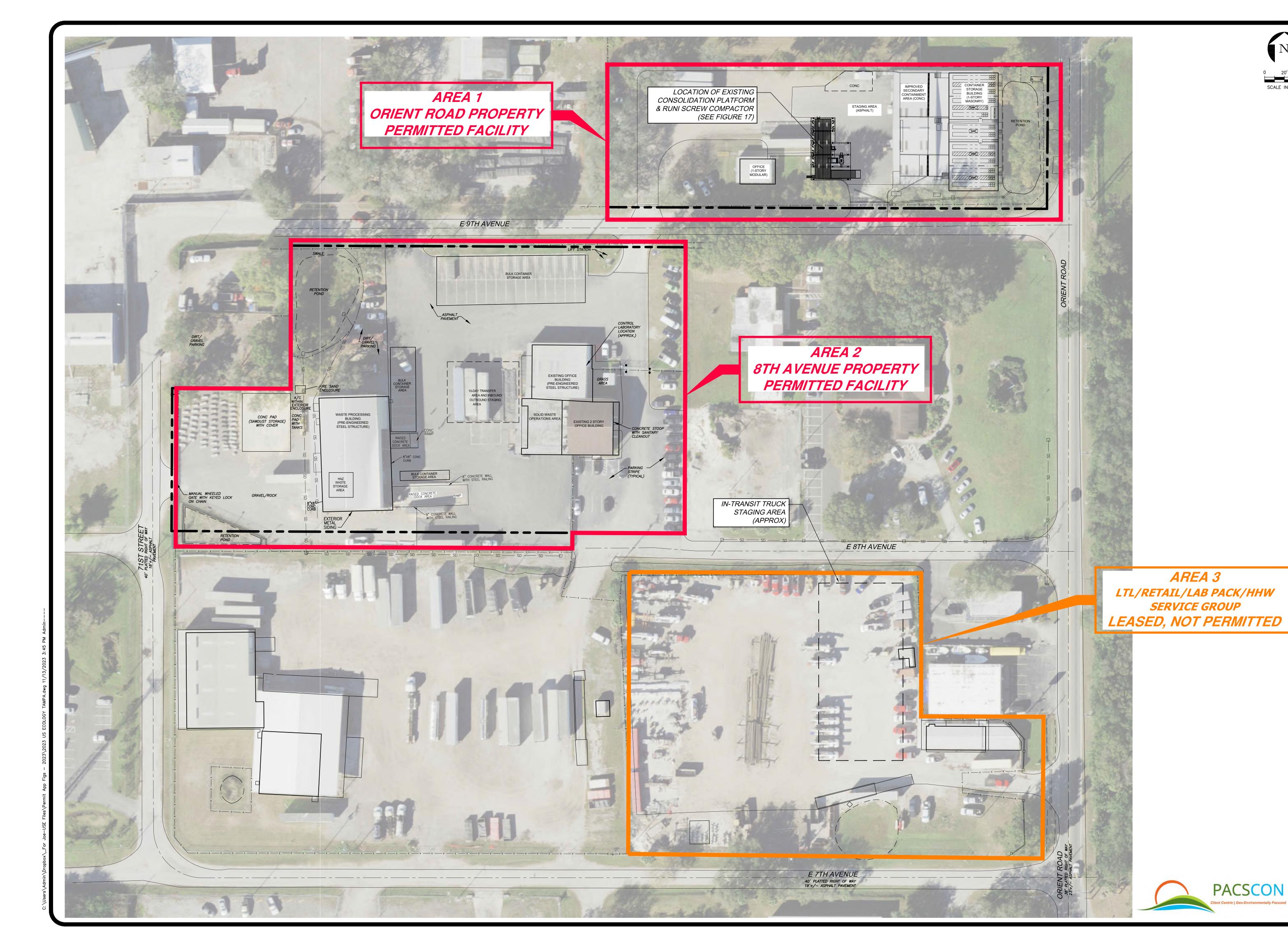
CROSS SECTION LOCATION MAP

NOT TO SCALE



GEOLOGICAL CROSS SECTION
US ECOLOGY TAMPA, INC.
7202 EAST 8TH AVENUE
TAMPA, FLORIDA 33619

10JECT No. 2023-1816 FIGURE



SCALE VERIFICATION
THIS BAR REPRESENTS
ONE INCH ON THE
ORIGINAL DRAWING

0
1"

SCON GEOENVIRONMENTAL, INC.

4517 GEORGE ROAD, SUITE 220

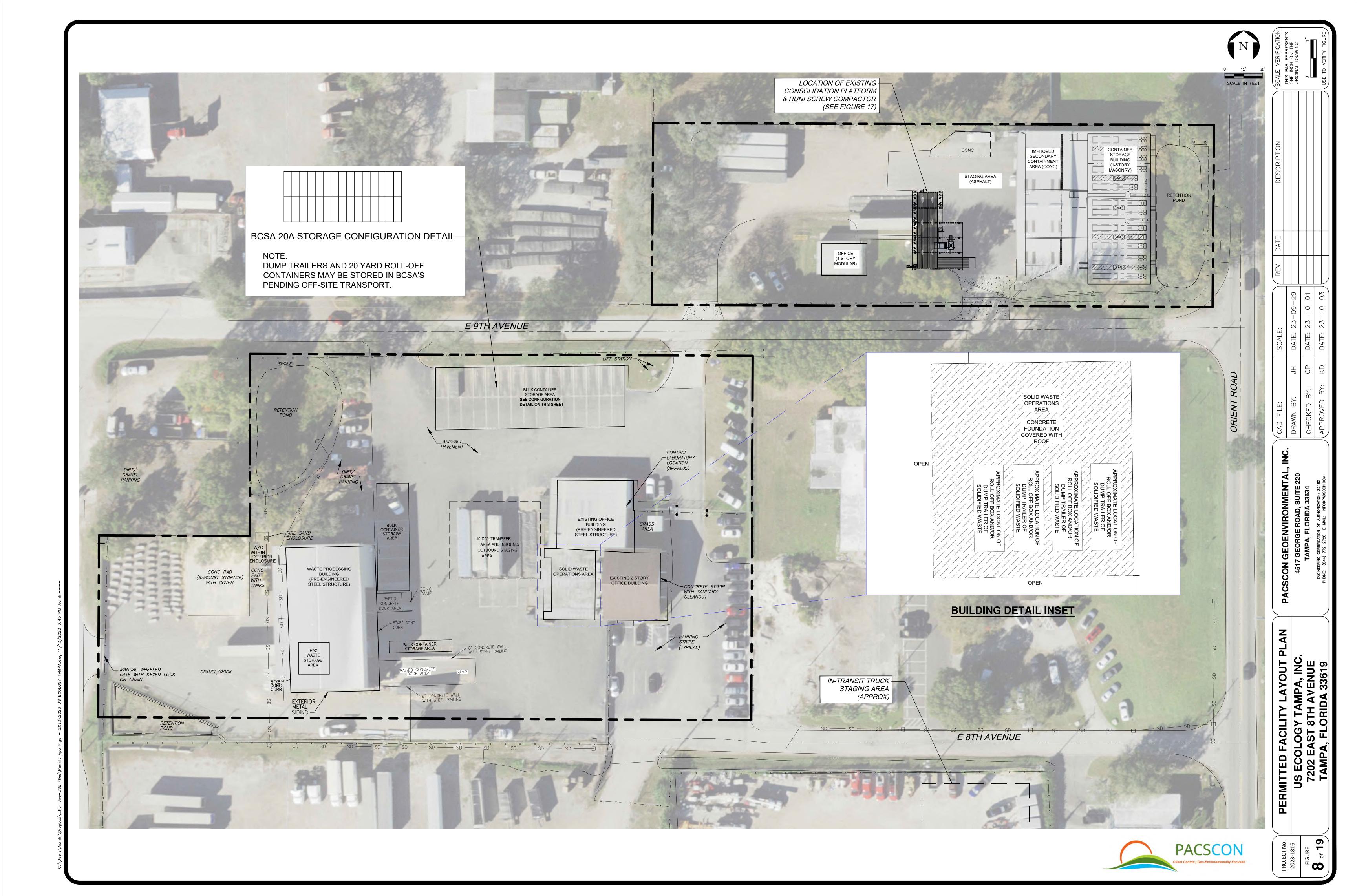
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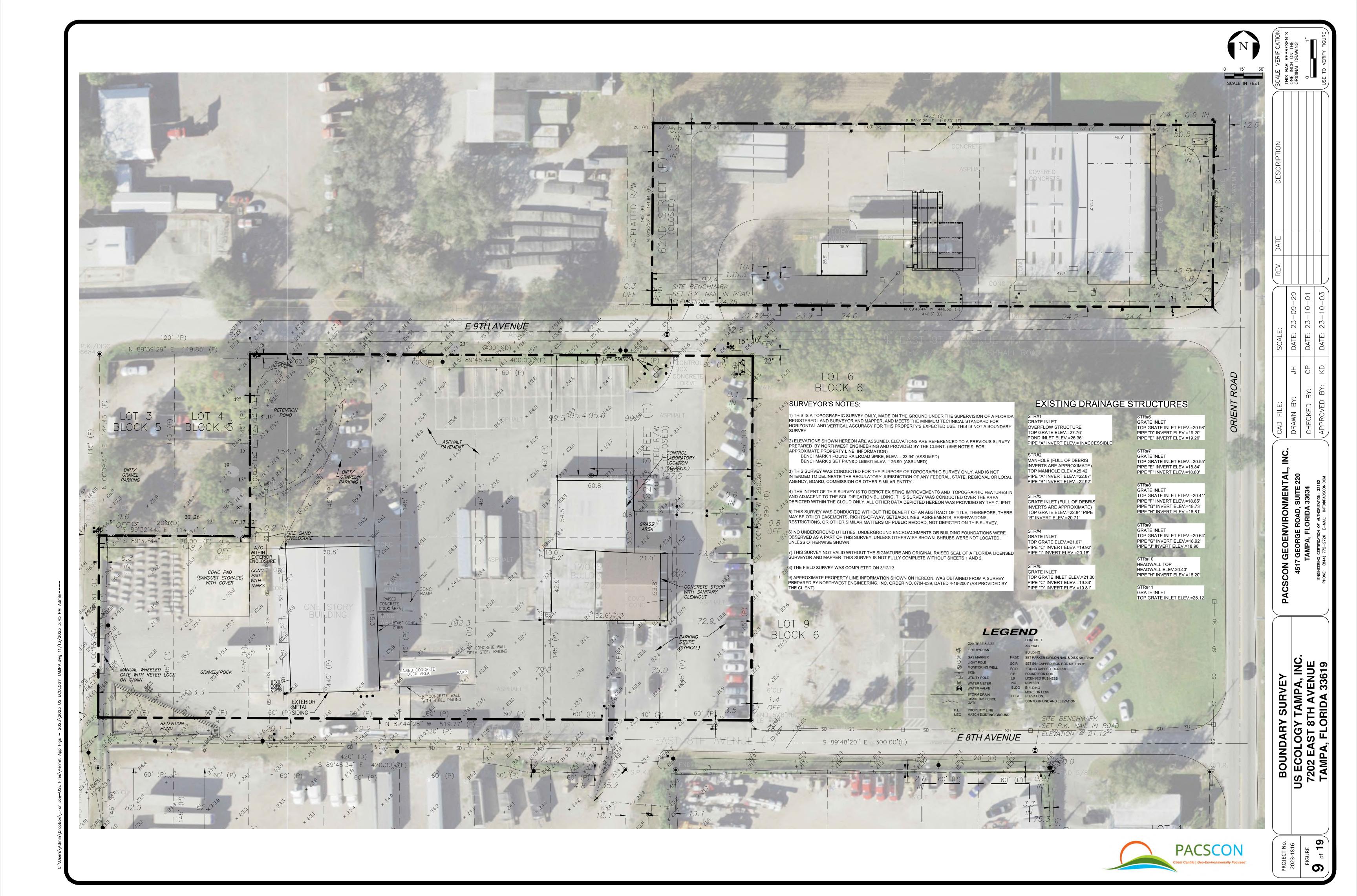
CHE

LAYOUT PLAN
AMPA, INC.
AVENUE

US ECOLOGY TAMPA, IN 7202 EAST 8TH AVENU

2023-1816 FIGURE of 19

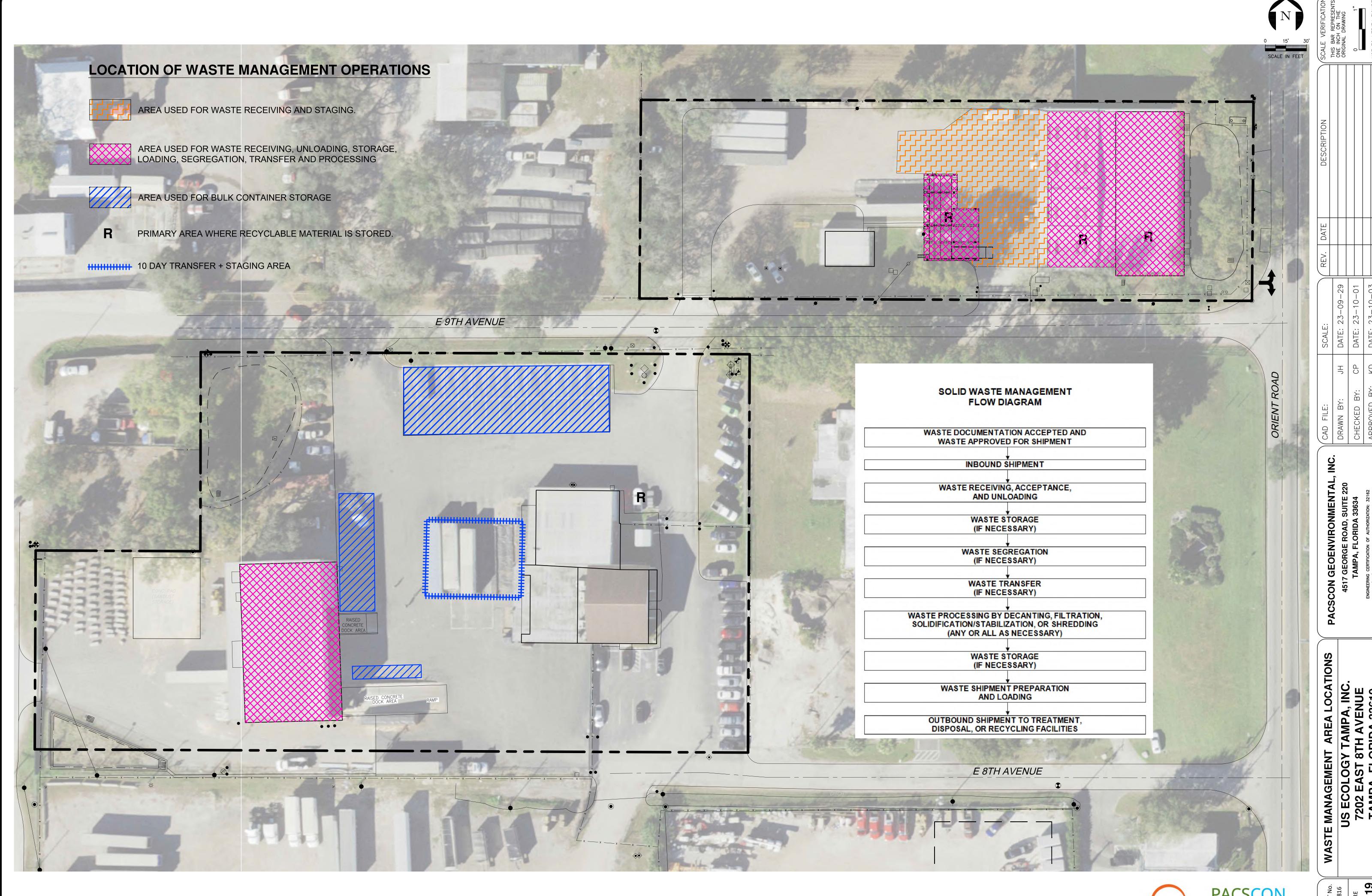






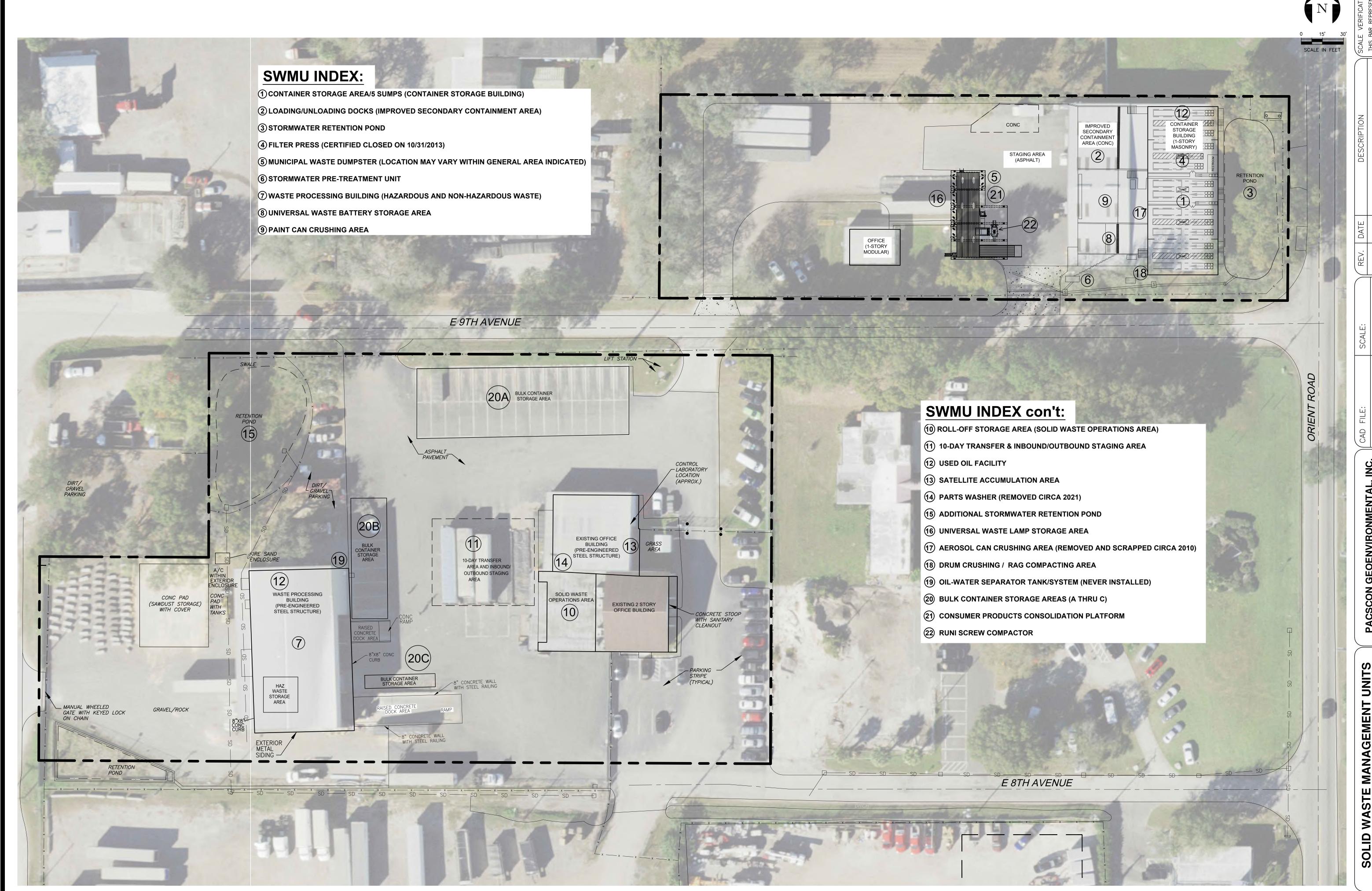


PROJECT NO. 2023-1816
FIGURE
Of 19





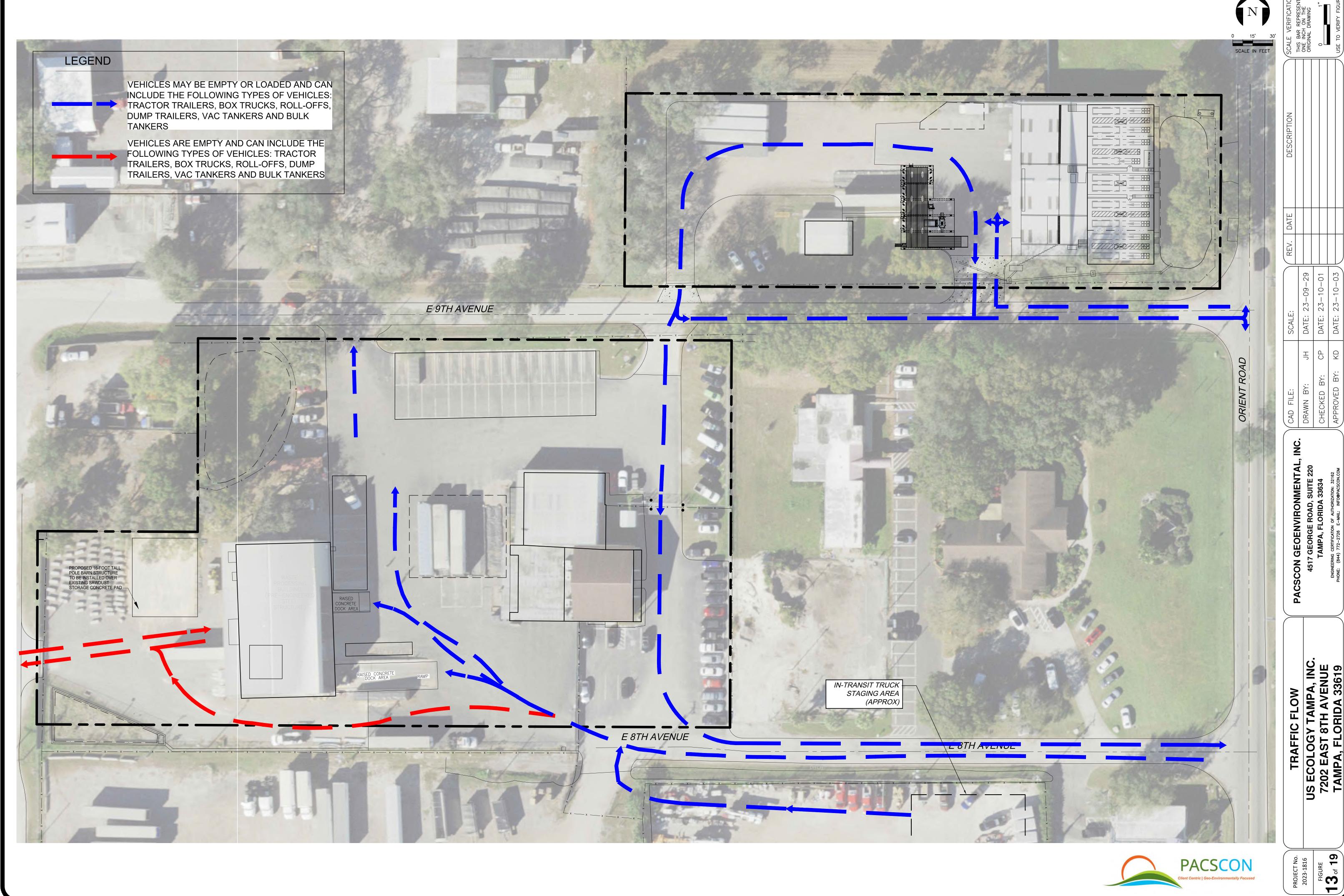
PROJECT NO. 2023-1816 FIGURE 1 of 19



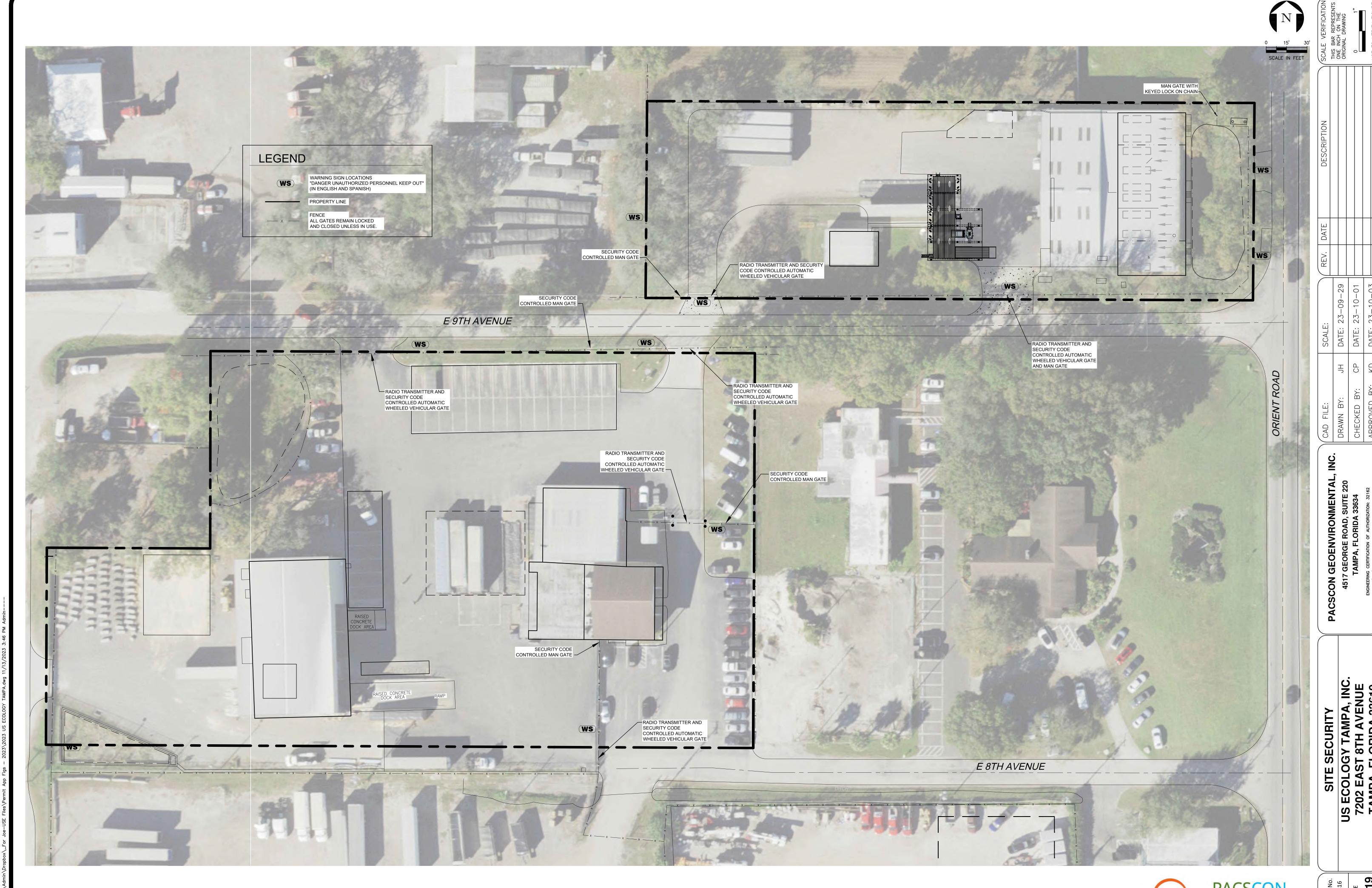


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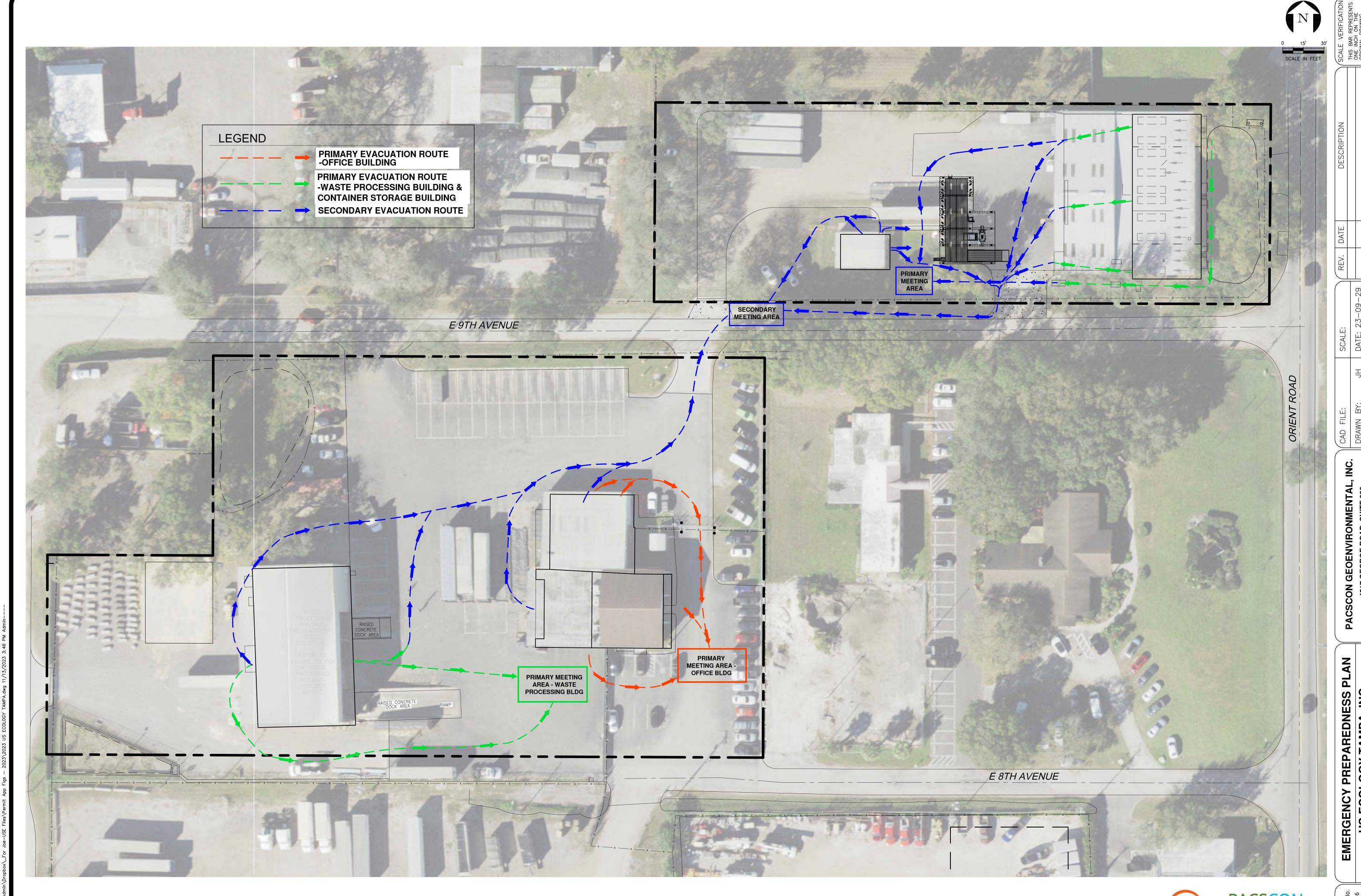






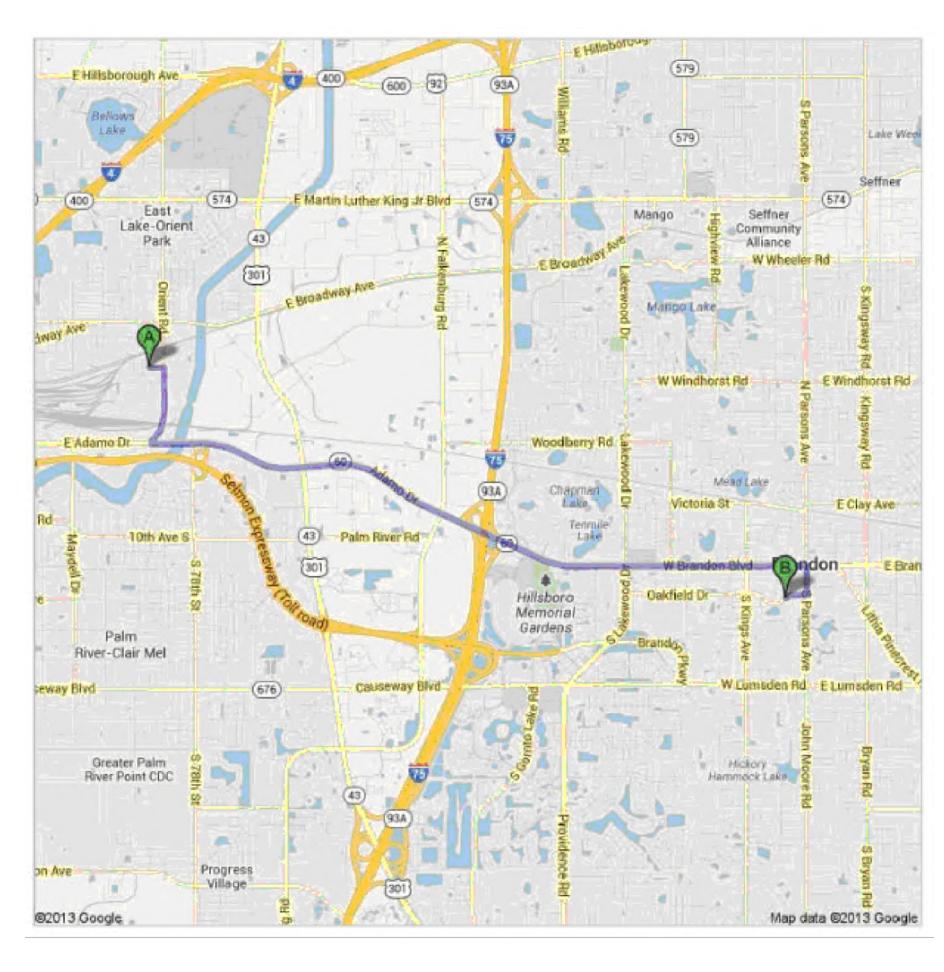
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FIGURE

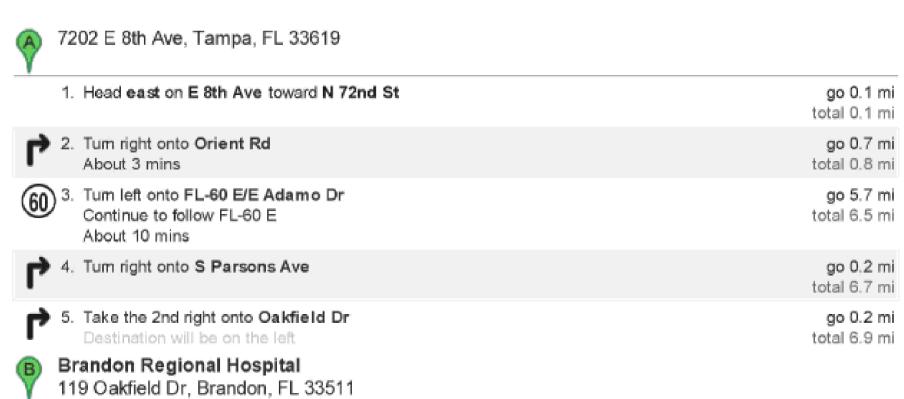
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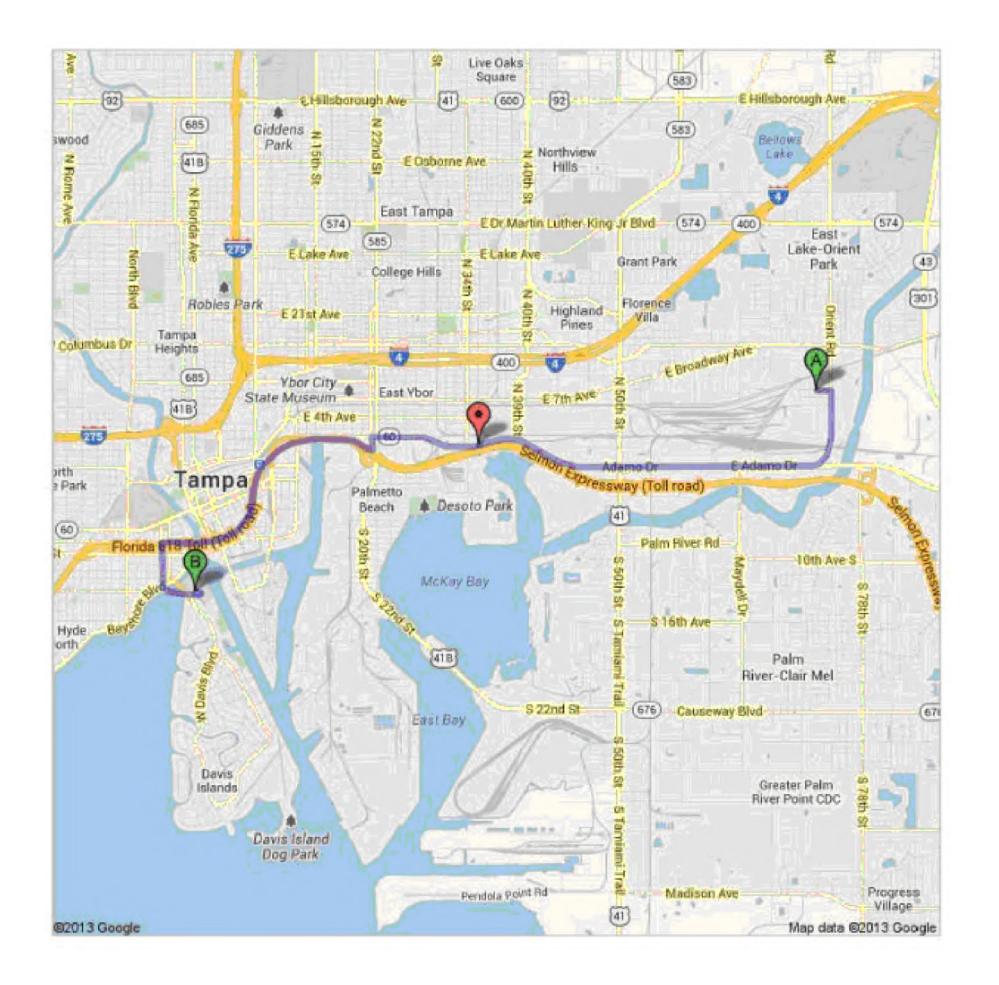












14.	Turn left to stay on Tampa General Cir Destination will be on the right	go 233 ft total 7.7 mi
13.	Turn left to stay on Tampa General Cir	go 85 fi total 7.6 m
1 12.	Keep left at the fork, follow signs for Emergency/Physician Parking and merge onto Tampa General Cir	go 194 fl total 7.6 m
1 11.	Keep left at the fork, follow signs for Tampa General Hospital	go 0.1 mi total 7.6 mi
10.	Take the exit toward <b>Tampa General Cir</b> About 46 secs	go 0.2 mi total 7.4 mi
1 9	Turn left onto S Hyde Park Ave About 2 mins	go 0.3 m total 7.2 m
8.	Merge onto W Brorein St	go 381 ft total 6.9 mi
7.	Take exit 5 toward Hyde Park Ave/Davis Islands Toll road	go 0.2 mi total 6.8 mi
6.	Merge onto Selmon Expressway Toll road About 2 mins	go 1.8 mi total 6.7 mi
5.	Turn right onto the Florida 618 West Toll ramp to St Petersburg Toll road About 45 secs	go 0.3 mi total 4.9 mi
1 4.	Turn left onto N 21st St About 1 min	go 495 ft total 4.7 mi
3.	Take the 3rd right onto E Adamo Dr About 7 mins	go 3.8 m total 4.6 m
2.	Turn right onto Orient Rd About 2 mins	go 0.6 m total 0.8 m
L	Head east on E 8th Ave toward N 72nd St	go 0.1 m total 0.1 m



PACSCON GEOENVIRONMENTAL, INC.

US ECOLOGY TAMPA, INC.

TAMPA, FLORIDA 33619

PACSCON GEOENVIRONMENTAL, INC.

4517 GEORGE ROAD, SUITE 220

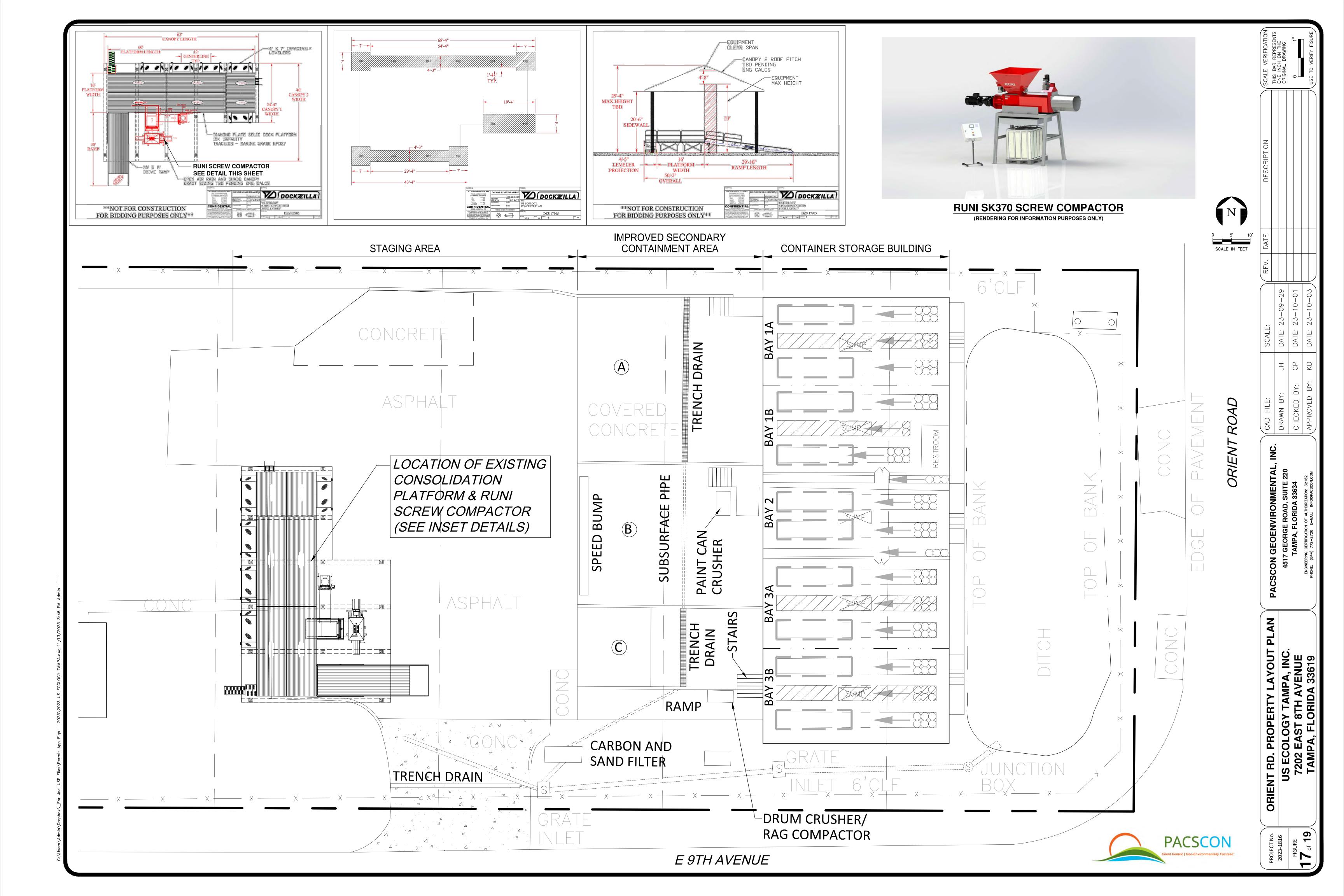
TAMPA, FLORIDA 33619

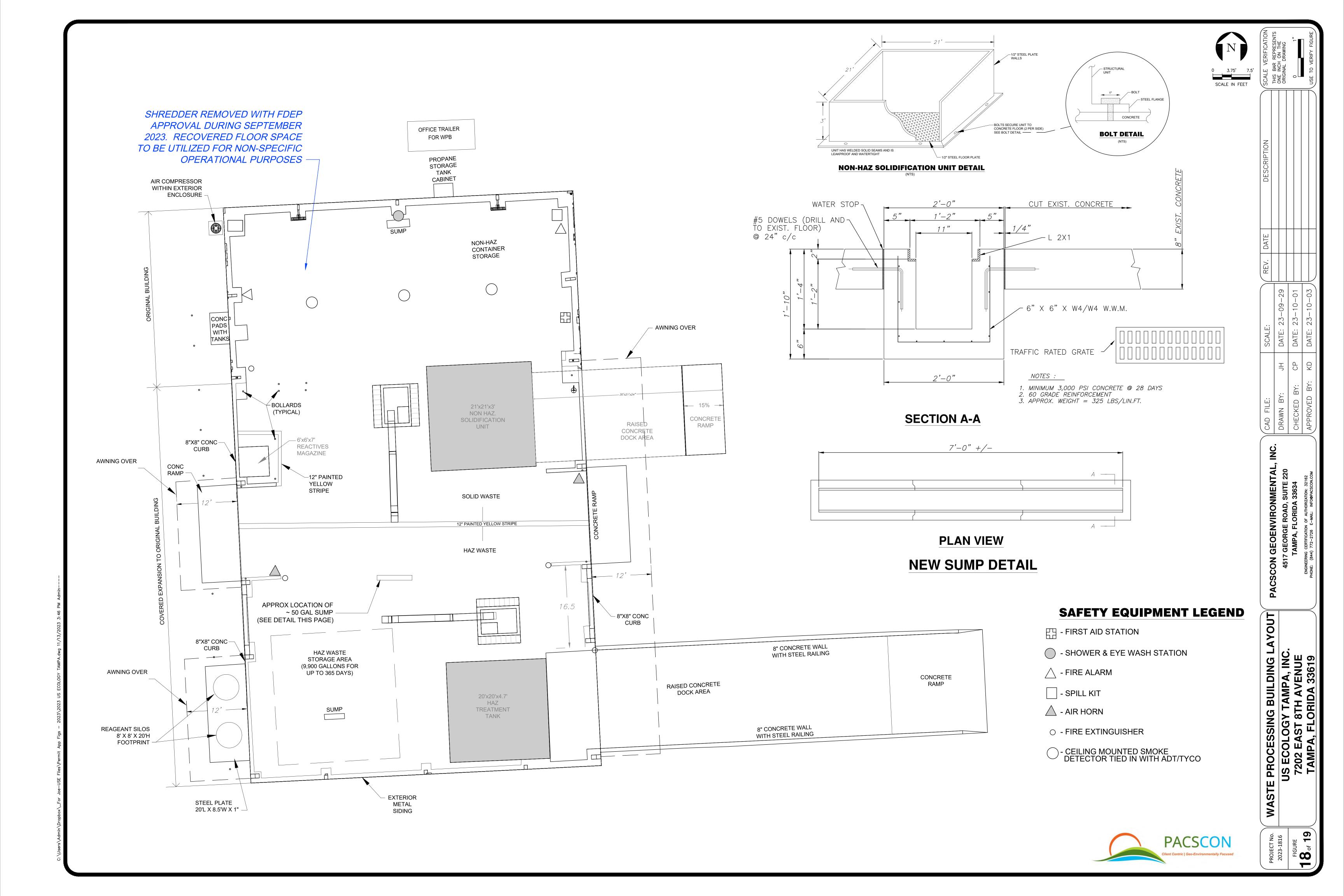
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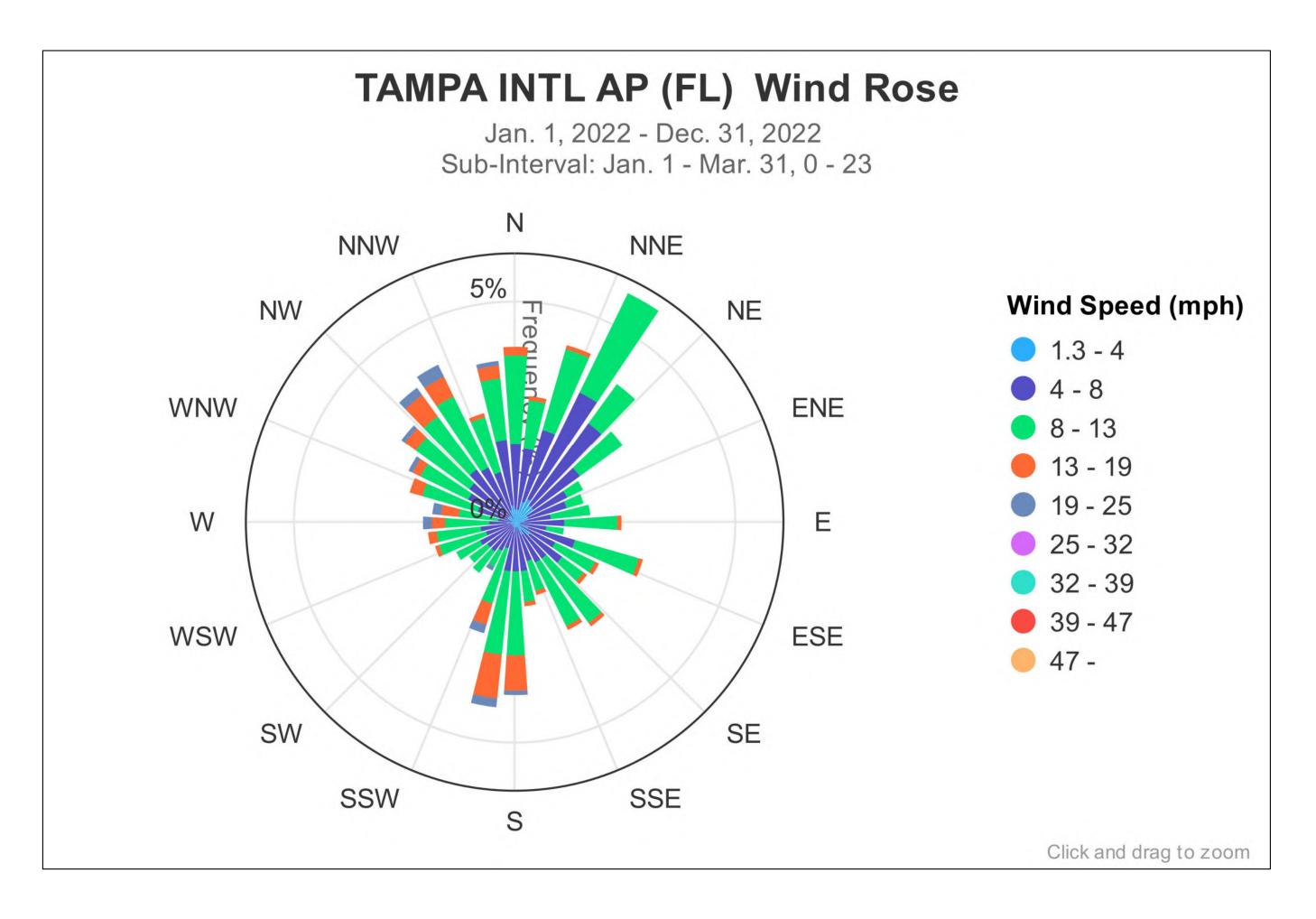
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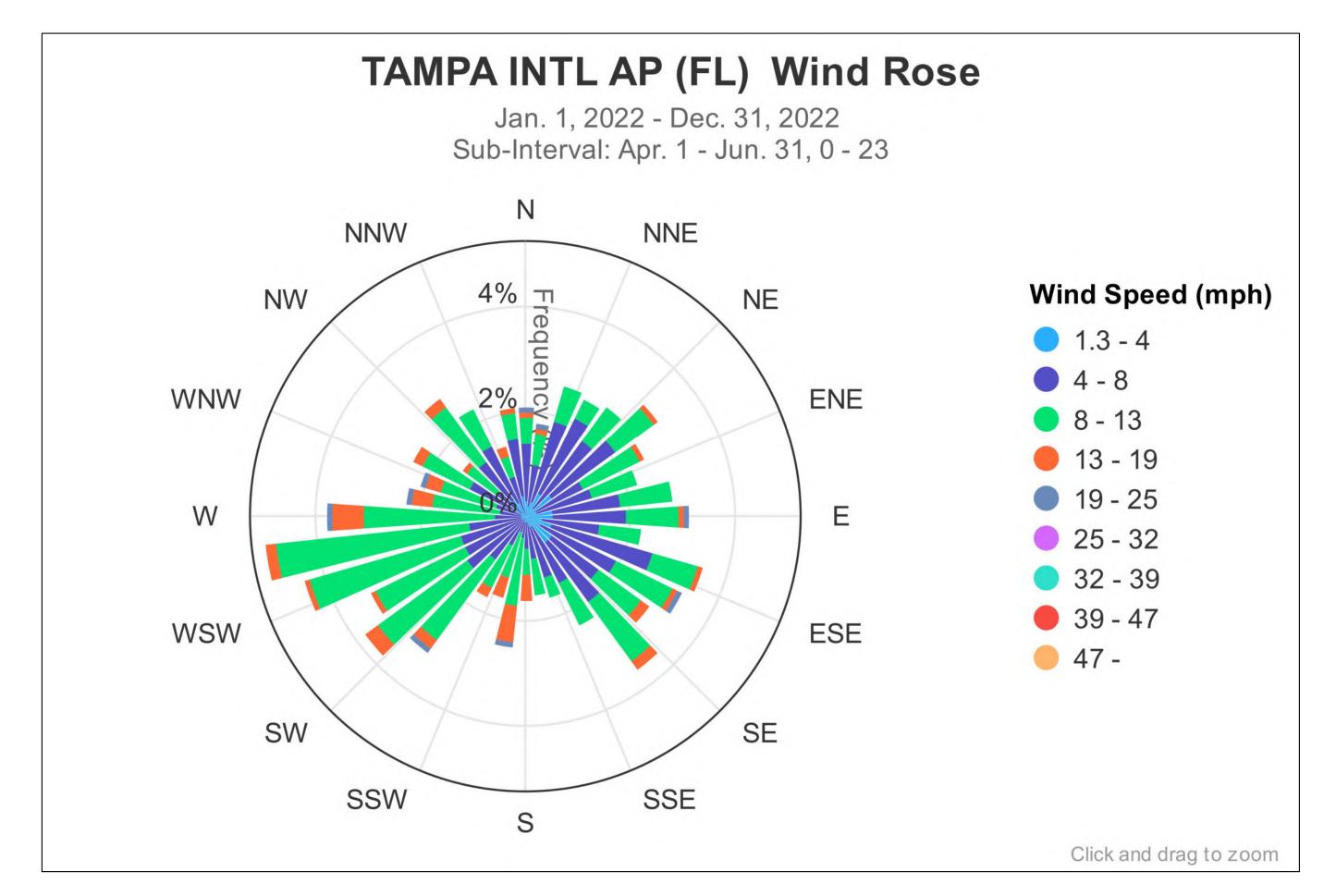
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FIGURE

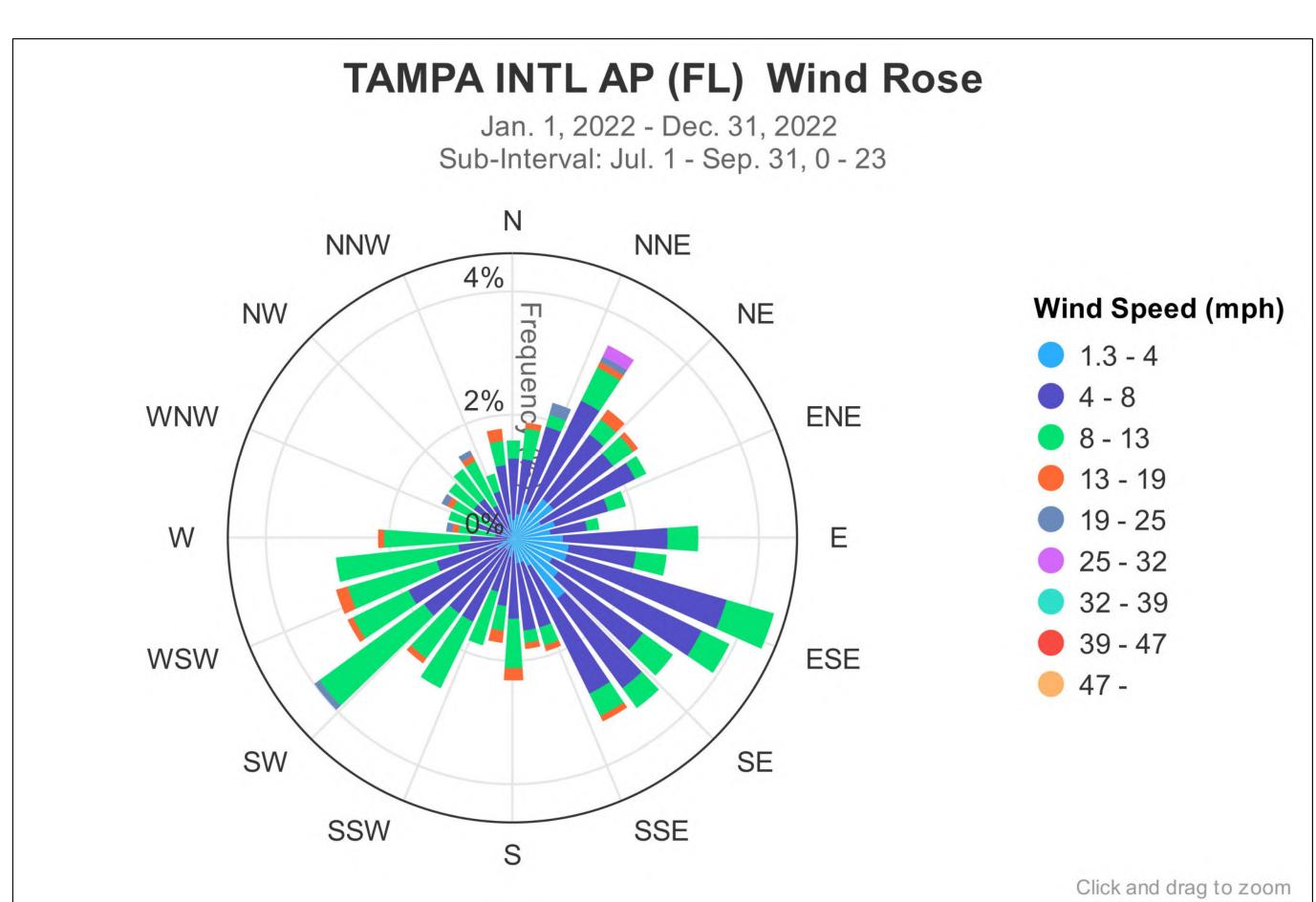
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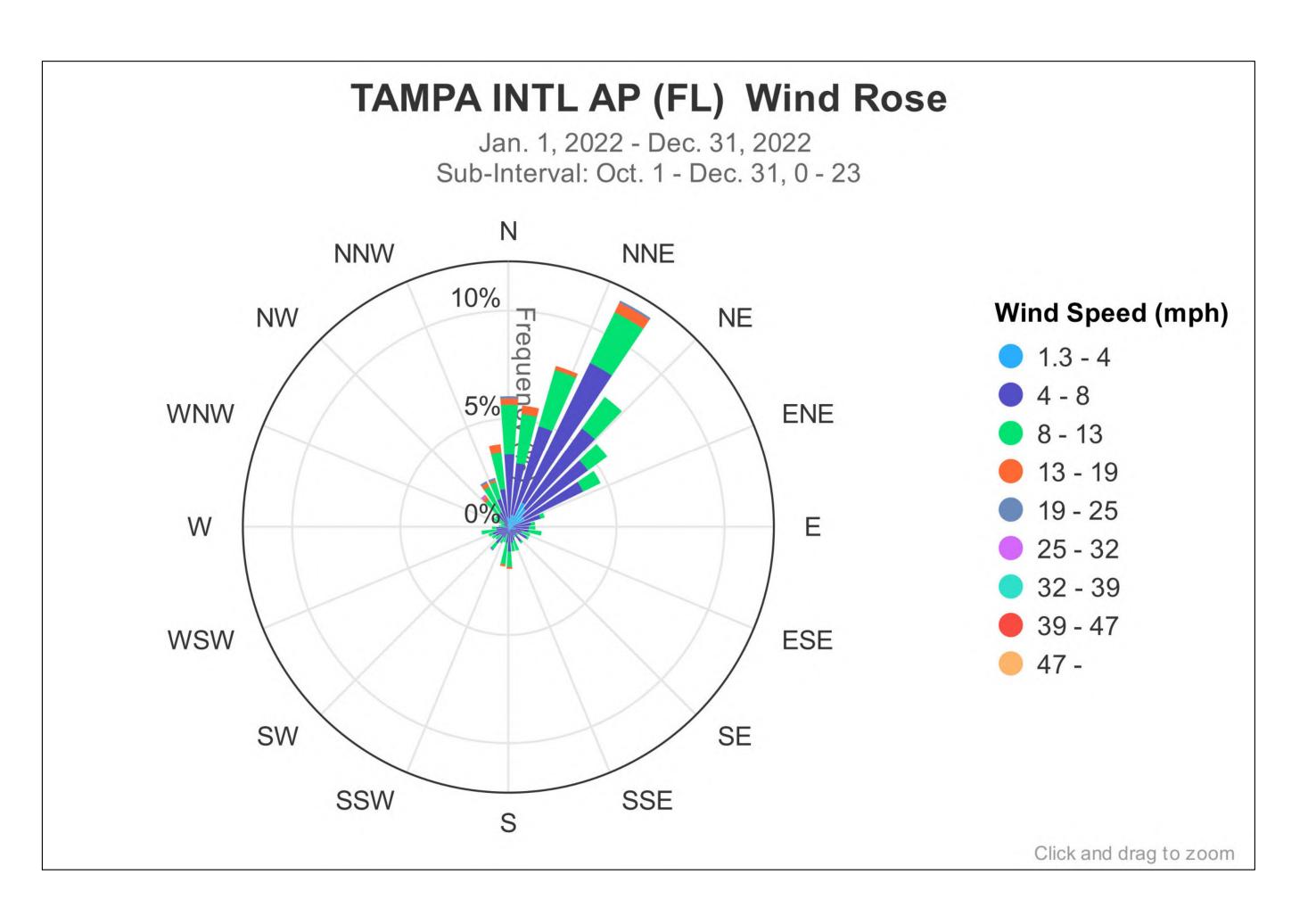














PACSCON GEOENVIRONMENTAL, I
4517 GEORGE ROAD, SUITE 220
TAMPA, FLORIDA 33634

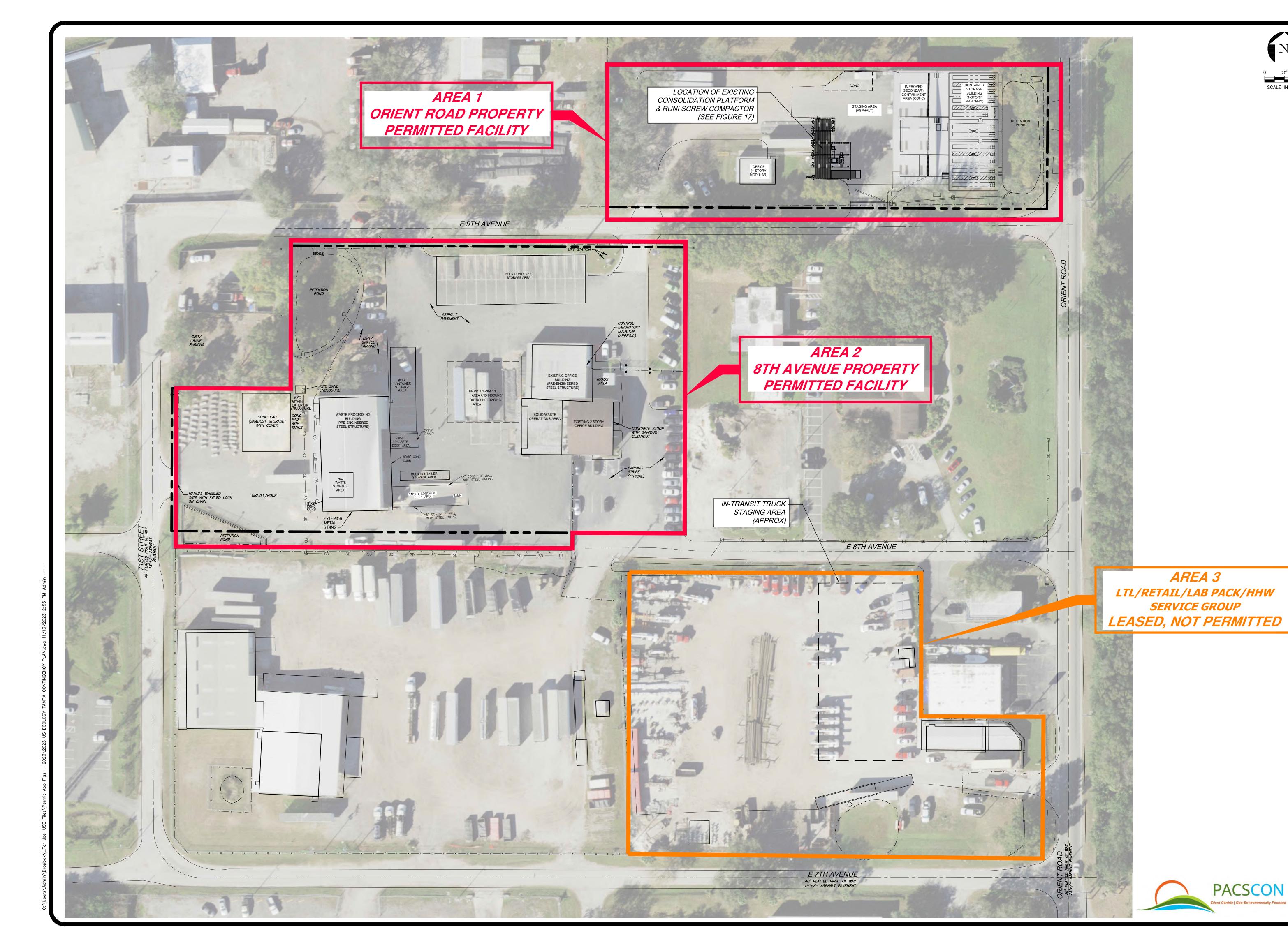
WIND ROSE DIAGRAMS
JS ECOLOGY TAMPA, INC.
7202 EAST 8TH AVENUE

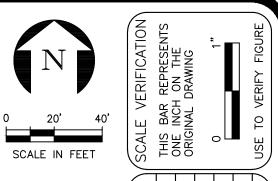
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FIGURE

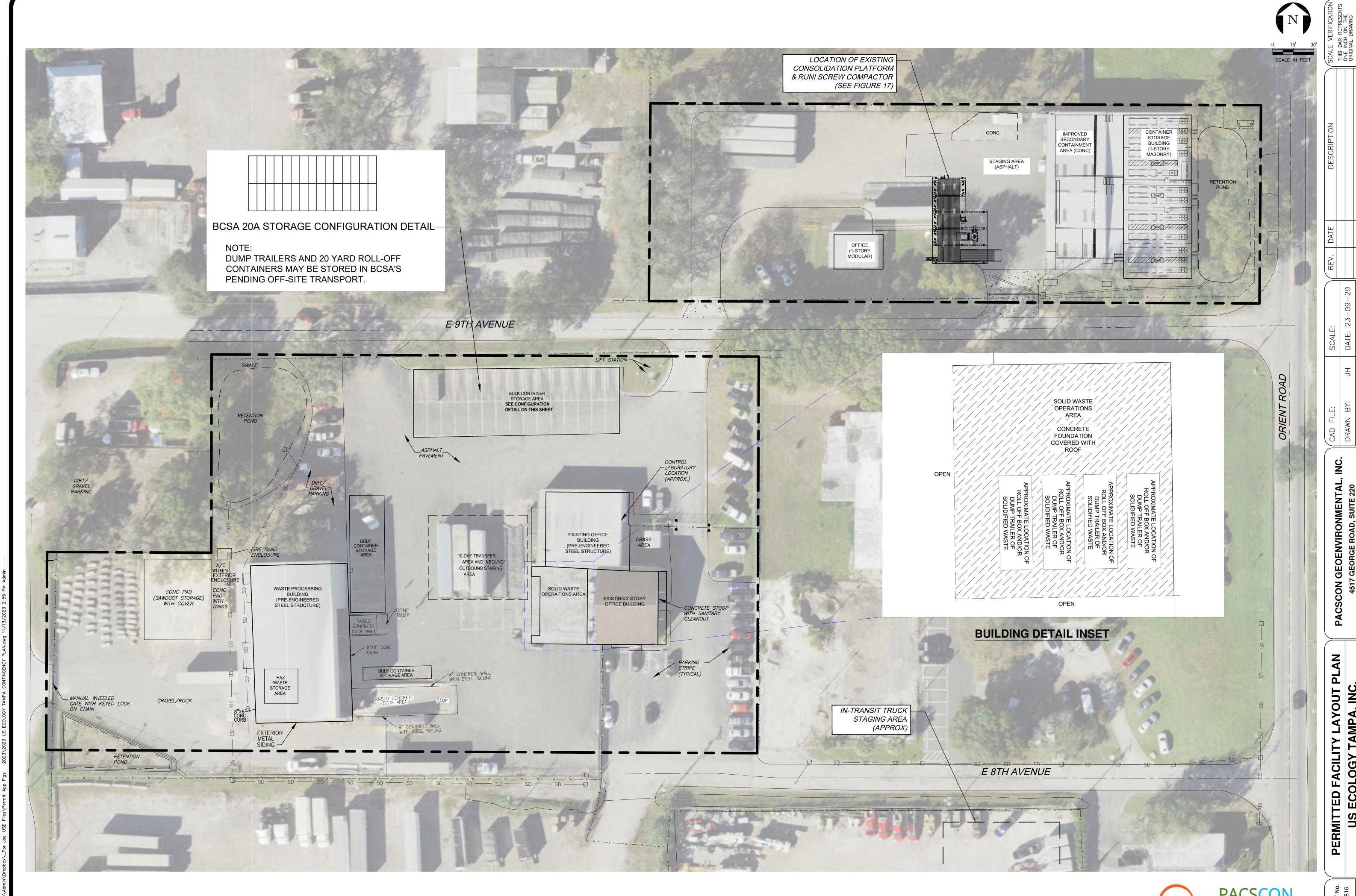
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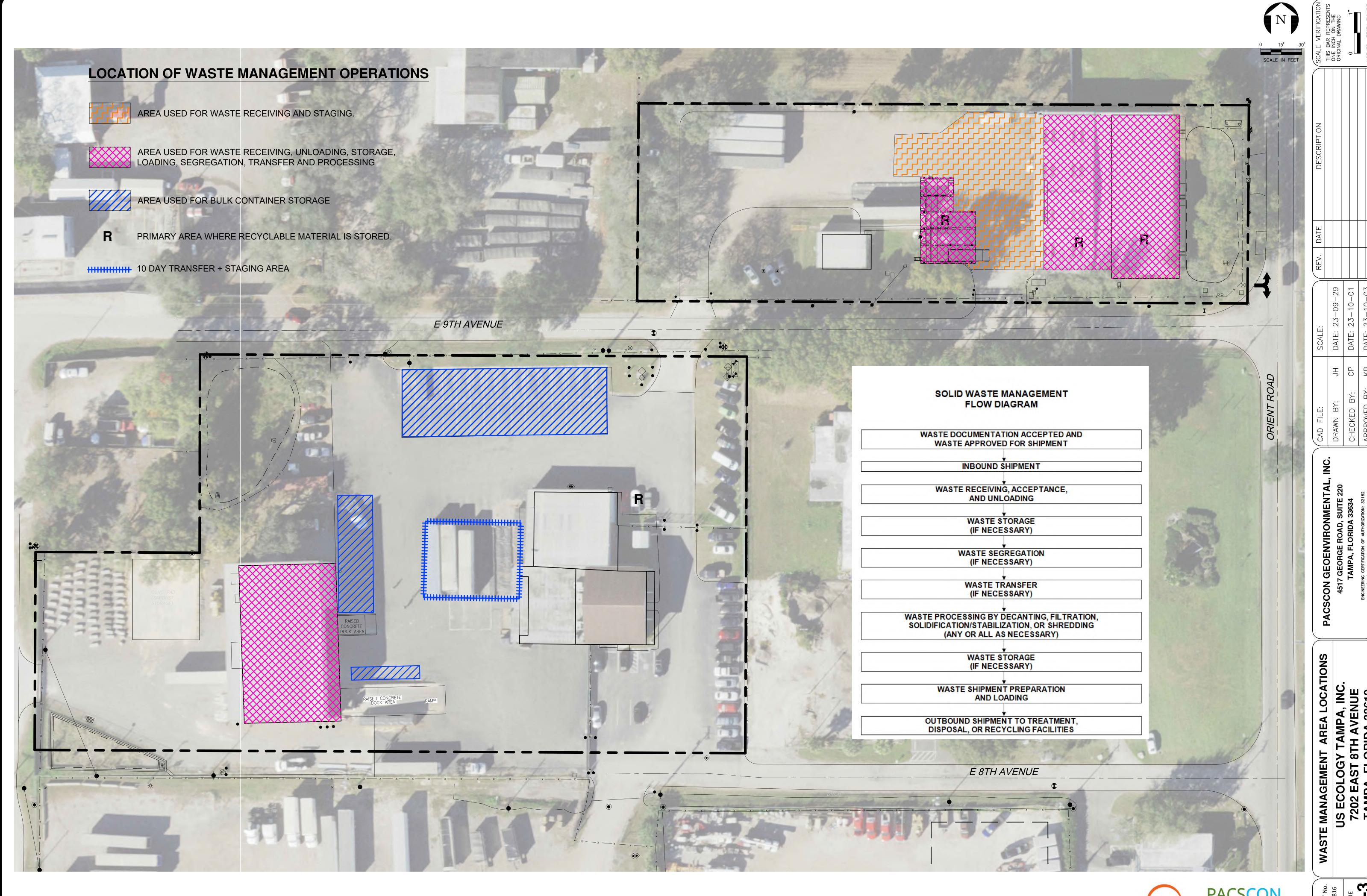
Volume 3 of 3 – Appendix Q - Facility Contingency Plan Figures CP-1 to CP-9











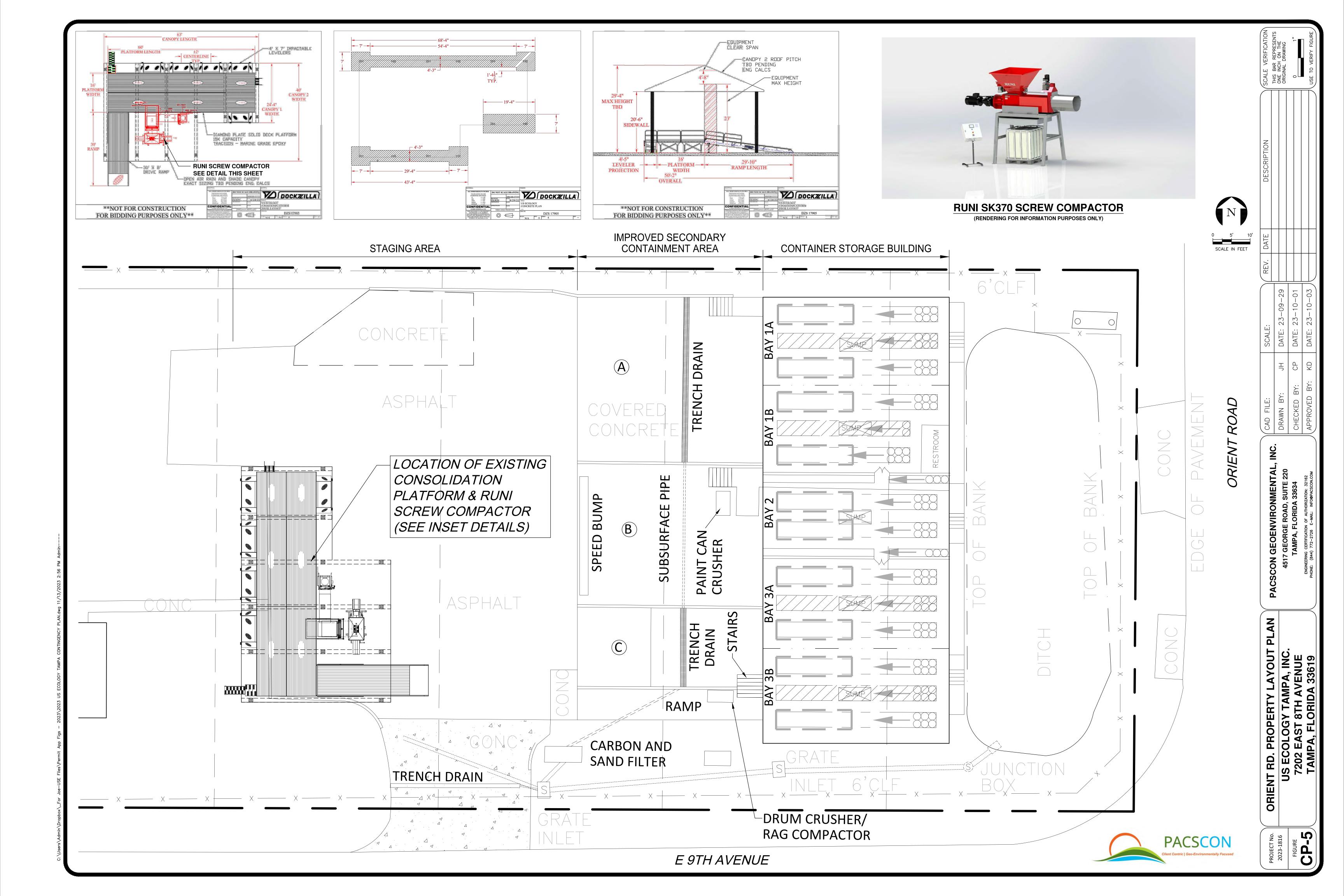


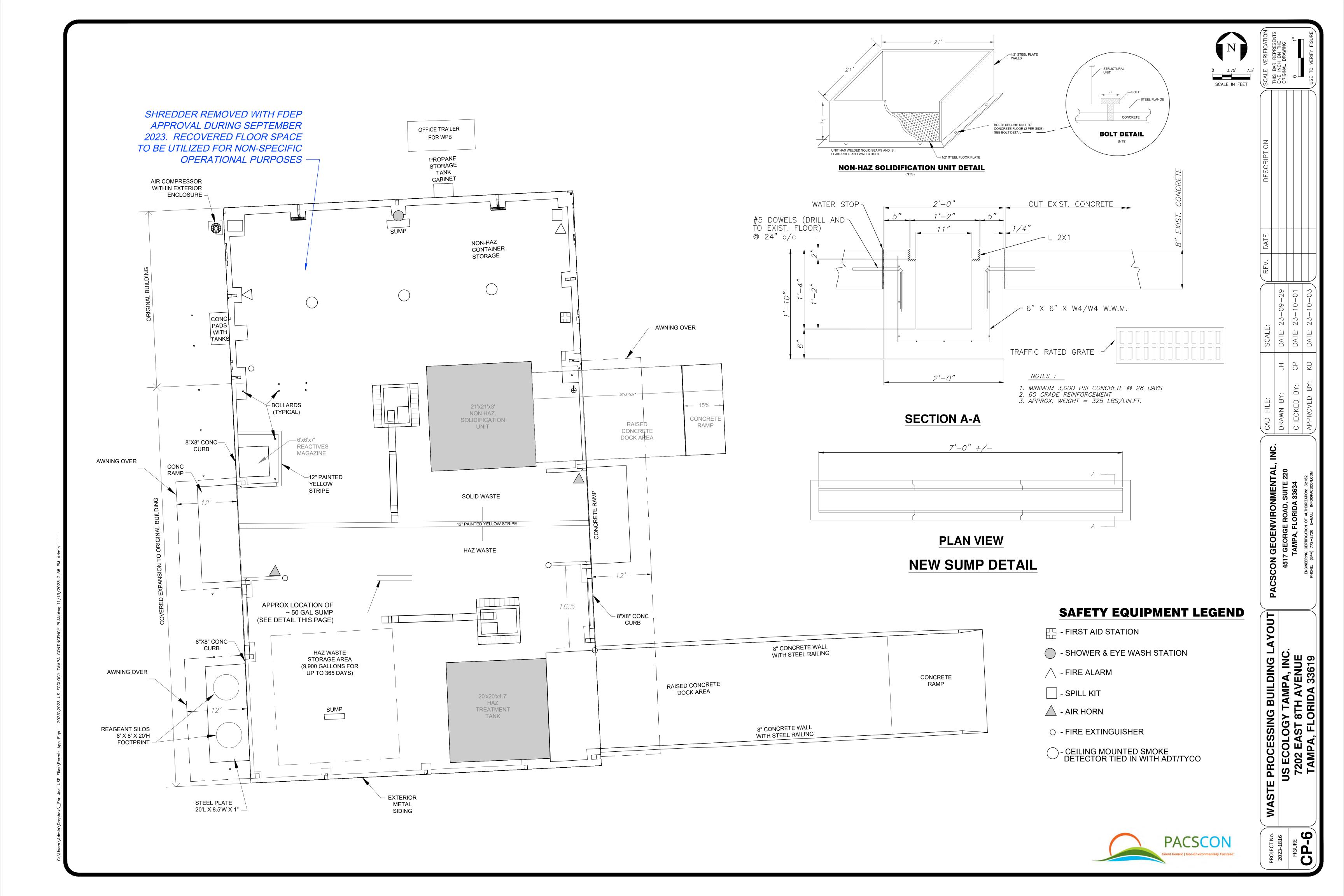
PROJECT No. 2023-1816 FIGURE

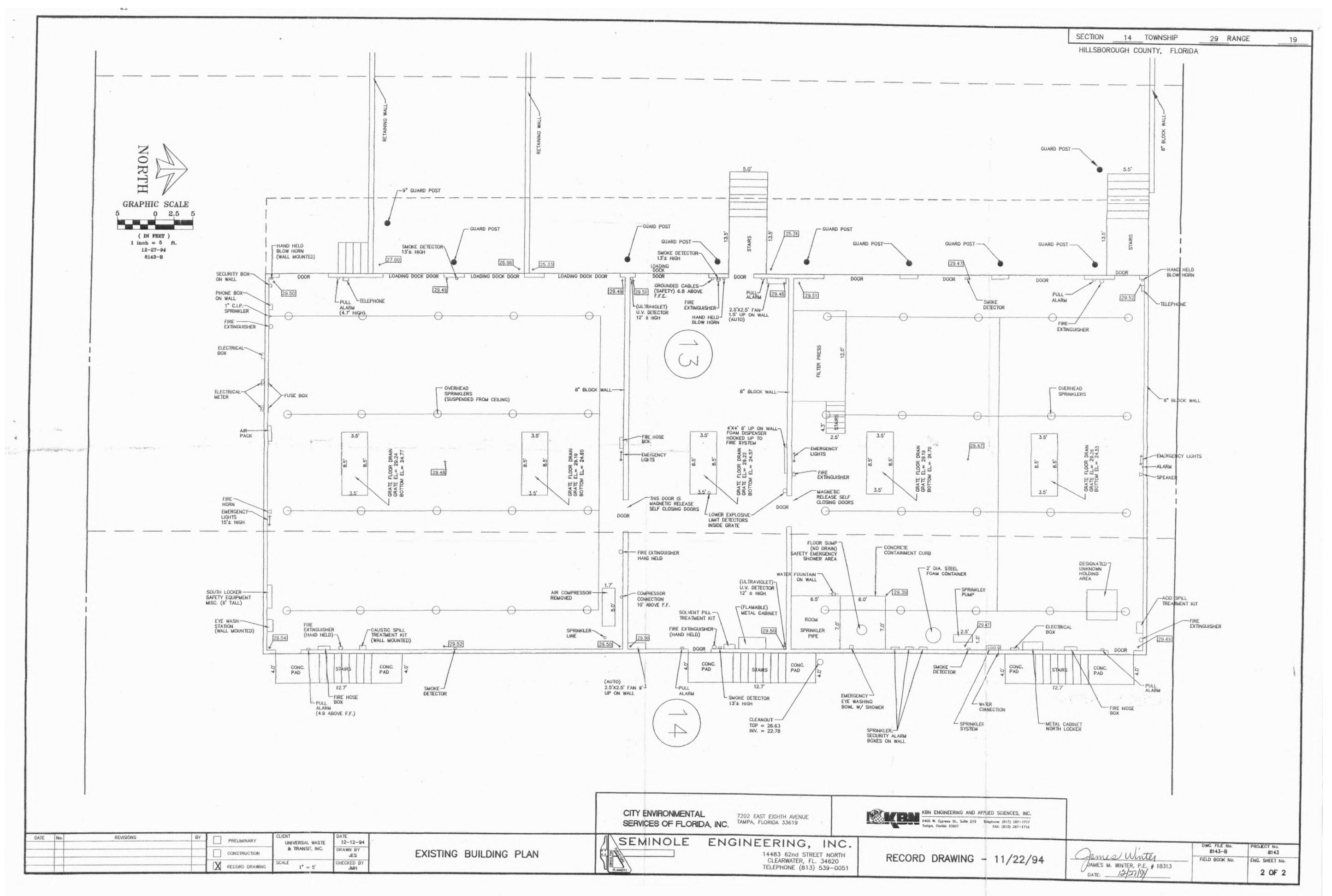


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PACS C

NOTE:
THE IMAGE ATTACHED TO THIS SHEET SHOWN ABOVE WAS PREPARED AND CERTIFIED BY OTHERS ON THE DATE SHOWN, AND IS INCLUDED HEREIN FOR REFERENCE ONLY.

PROJECT No. 2023-1816

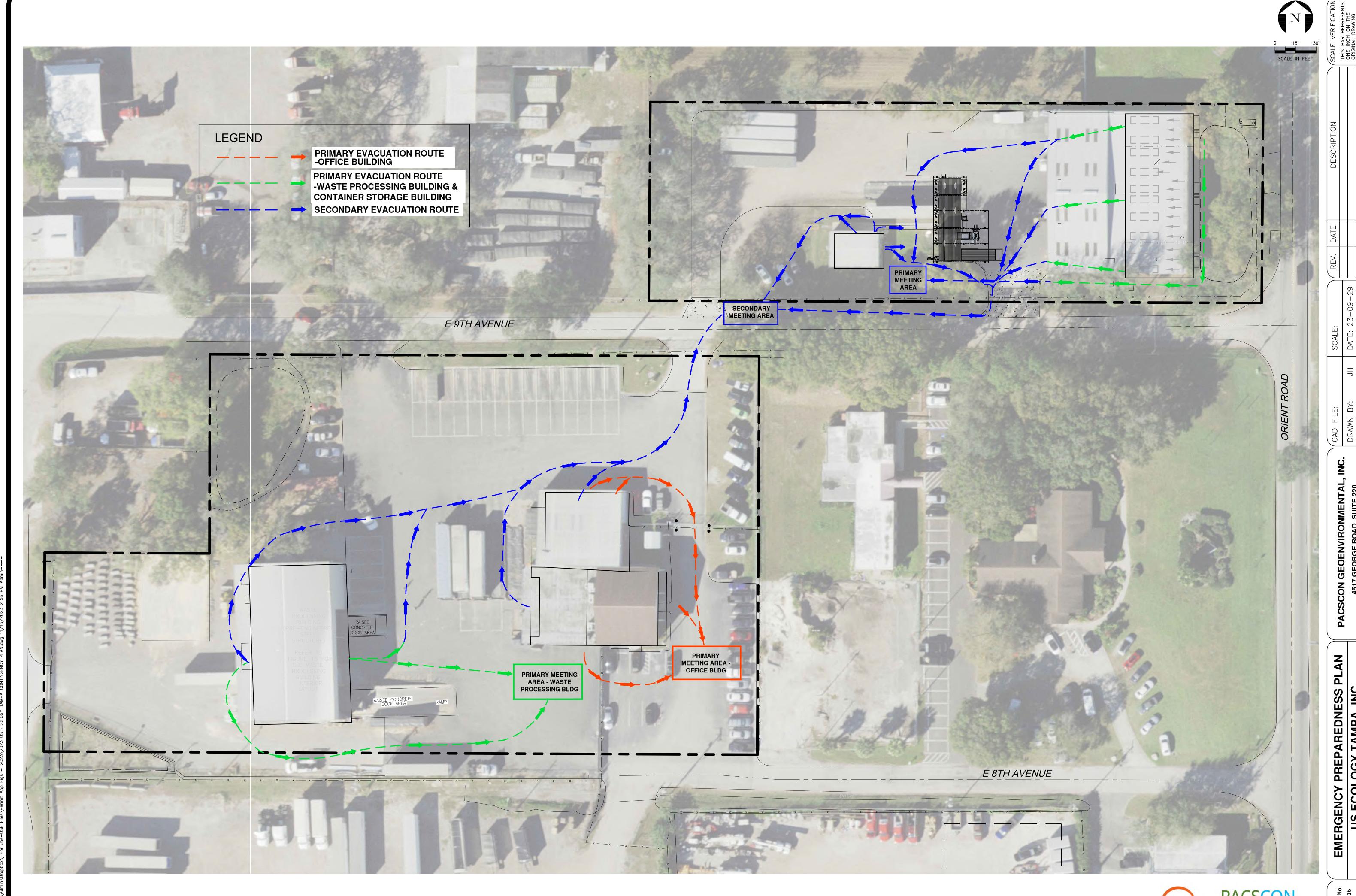
FIGURE

CONTAINER STORAG

& FIRE CONTE

US ECOLOGY

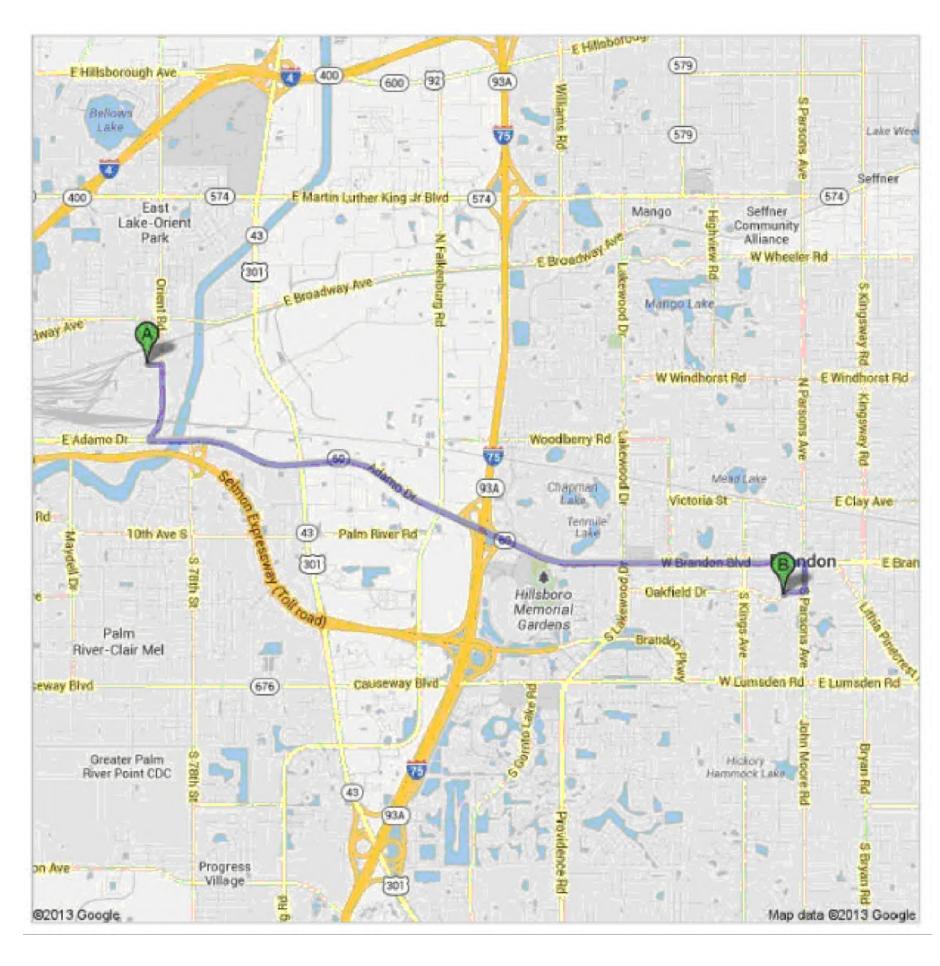
TAMPA, FLC

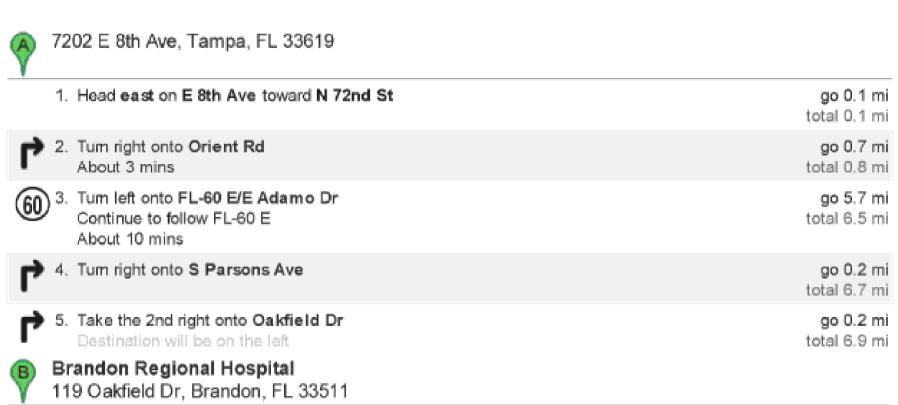


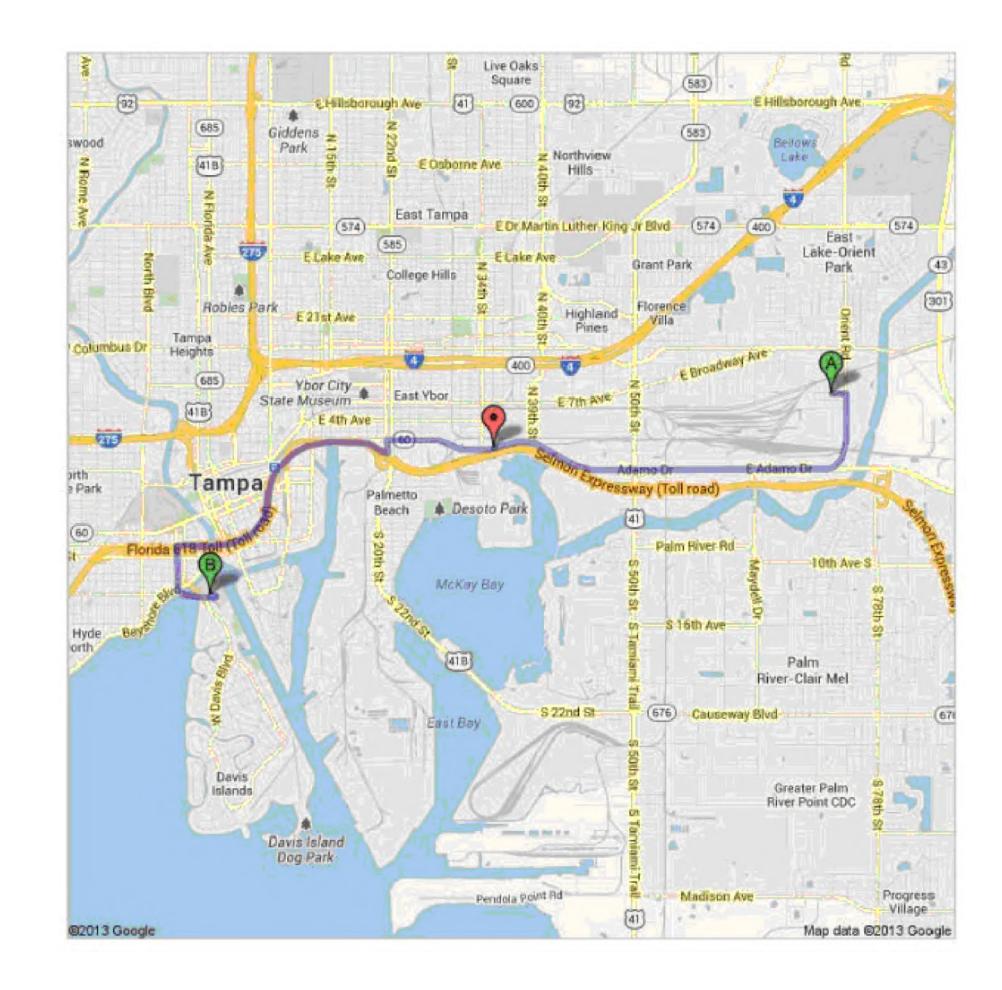
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n right onto Orient Rd out 2 mins  see the 3rd right onto E Adamo Dr out 7 mins  n left onto N 21st St out 1 min  n right onto the Florida 618 West Toll ramp to St Petersburg I road out 45 secs rge onto Selmon Expressway I road out 2 mins see exit 5 toward Hyde Park Ave/Davis Islands I road rge onto W Brorein St	total 4.6 m go 495 fi total 4.7 m go 0.3 m total 4.9 m go 1.8 m total 6.7 m go 0.2 m total 6.8 m
n left onto N 21st St out 1 min n right onto the Florida 618 West Toll ramp to St Petersburg I road out 45 secs rge onto Selmon Expressway I road out 2 mins se exit 5 toward Hyde Park Ave/Davis Islands	go 1.8 m go 1.8 m total 6.7 m go 0.2 m total 6.8 m
out 1 min In right onto the Florida 618 West Toll ramp to St Petersburg I road Out 45 secs Irge onto Selmon Expressway I road Out 2 mins Re exit 5 toward Hyde Park Ave/Davis Islands	go 0.3 m total 4.9 m total 4.9 m go 1.8 m total 6.7 m go 0.2 m total 6.8 m
road out 45 secs rge onto Selmon Expressway I road out 2 mins se exit 5 toward Hyde Park Ave/Davis Islands	total 6.7 mi go 0.2 mi total 6.8 mi go 381 fl
l road out 2 mins re exit 5 toward <b>Hyde Park Ave/Davis Islands</b> I road	total 6.8 mi go 381 ft
l road	
rge onto W Brorein St	go 381 ft
	total 6.9 mi
n left onto S Hyde Park Ave out 2 mins	go 0.3 mi total 7.2 mi
re the exit toward <b>Tampa General Cir</b> out 46 secs	go 0.2 mi total 7.4 mi
ep left at the fork, follow signs for Tampa General Hospital	go 0.1 mi total 7.6 mi
	go 194 ft total 7.6 mi
n left to stay on Tampa General Cir	go 85 ft total 7.6 mi
	go 233 ft total 7.7 mi
	ep left at the fork, follow signs for Emergency/Physician Parking and merge onto mpa General Cir m left to stay on Tampa General Cir stination will be on the right General Cir, Tampa, FL 33606



ROUTES TO HOSPITALS
US ECOLOGY TAMPA, INC.
7202 EAST 8TH AVENUE
TAMPA, FLORIDA 33619

PROJECT No. 2023-1816
FIGURE

CP-9



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E| info@pacscon.com