



**RCRA OPERATING PERMIT
RENEWAL APPLICATION**

*Safety-Kleen Systems, Inc.
Tallahassee Service Center
4426 Entrepot Blvd.
Tallahassee, FL 32310
FLD 982 133 159*

Revision 0

September 15, 2024

Prepared by:

Safety-Kleen Systems, Inc.
42 Longwater Drive
Norwell, MA 02061

Safety-Kleen Tallahassee, FL RCRA Operating Permit Renewal 2024

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**APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT
CERTIFICATION
TO BE COMPLETED BY ALL APPLICANTS**

Signature and Certification

Facility Name Safety-Kleen Systems, Inc.

EPA/DEP I.D. No. FLD 982 133 159

The following certifications must be included with the submittal of an application for a hazardous waste authorization. The certifications must be signed by the owner of a sole proprietorship; or by a general partner of a partnership; or by a principal executive officer of at least the level of vice president of a corporation or business association, or by a duly authorized representative of that person. If the same person is a facility operator, facility owner, and real property owner, that person can cross out and initial the signature blocks under "1. Facility Operator" and "2. Facility Owner," and add the words "Facility Owner and Operator" at the line "Signature of the Land Owner or Authorized Representative."

1. Facility Operator

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules of the Department of Environmental Protection. It is understood that the permit is only transferable in accordance with Chapter 62-730, Florida Administrative Code (F.A.C.), and, if granted a permit, the Department of Environmental Protection will be notified prior to the sale or legal transfer of the permitted facility.

Maggie Tenant Digitally signed by Maggie Tenant
Date: 2024.09.10 10:40:47 -04'00'

Signature of the Operator or Authorized Representative*

Maggie Tenant, VP Environmental Compliance

Name and Title (Please type or print)

Date 09/10/2024 E-mail address maggie.tenant@safety-kleen.com

Telephone (734) 516-0291

*** Attach a letter of authorization**

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2. Facility Owner

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, operate, or conduct remedial activities at a hazardous waste management facility on the property as described. As owner of the facility, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, and all rules of the Department of Environmental Protection.

Maggie Tenant

Digitally signed by Maggie Tenant
Date: 2024.09.10 10:41:06 -04'00'

Signature of the Facility Owner or Authorized Representative*

Maggie Tenant, VP Environmental Compliance

Name and Title (Please type or print)

Date 09/10/2024 E-mail address maggie.tenant@safety-kleen.com

Telephone (734) 516-0291

*** Attach a letter of authorization**

3. Land Owner

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit for the construction, operation, postclosure or corrective actions of a hazardous waste management facility on the property as described. For hazardous waste facilities that close with waste in place, I further understand that I am responsible for providing the notice in the deed to the property required by 40 CFR 264.119 and 265.119, as adopted by reference in Chapter 62-730, F.A.C.

Maggie Tenant

Digitally signed by Maggie Tenant
Date: 2024.09.10 10:41:25 -04'00'

Signature of the Land Owner or Authorized Representative*

Maggie Tenant, VP Environmental Compliance

Name and Title (Please type or print)

Date 09/10/2024 E-mail address maggie.tenant@safety-kleen.com

Telephone (734) 516-0291

*** Attach a letter of authorization**

SAFETY-KLEEN SYSTEMS, INC.

Consent Resolution of the Directors

June 18, 2014


The undersigned, being all of the Directors of Safety-Kleen Systems, Inc., a Wisconsin corporation (the "Company"), hereby consent to and adopt the following resolutions effective as of the above date.

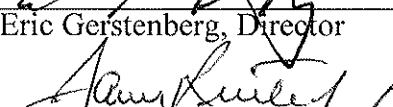
Resolved: That each individual with the title of President, Senior Vice President, Vice President, Director, Manager or Member of the Company, or any of its subsidiaries, shall have the power and authority to sign, certify, and deliver on behalf of the Company or any subsidiary, any necessary or desirable environmental documents, including, without limitation, any permit applications or amendments and any environmental reports in any way related to the operations of the Company or its subsidiaries. In addition to the foregoing, to the extent that the Company operates any facility with more than 250 people or having gross annual sales or expenditures in excess of the \$25,000,000, the General Manager of such facility shall have all of the foregoing authority with respect to the operations of any such facility.

Resolved: That the President, and any Senior Vice President, Vice President or Secretary or Assistant Secretary of the Company may designate an employee of an affiliated company to sign and certify, on behalf of the Company or any subsidiary, any necessary or desirable environmental documents, including, without limitation, any permit applications, transportation related documents and environmental reports in any way related to the operations of the Company or one of its subsidiaries.

Resolved: That the Secretary or any Assistant Secretary of the Company is hereby authorized on behalf of the Company to certify as to who are the officers of the Company and to the due authority of any officer or other person executing any of the foregoing documents or any other documents on behalf of the Company, and any governmental official or other third party shall be entitled to fully rely on any such certification.

WITNESS the execution hereof under seal as of the date first above written.


Eric Gerstenberg, Director


James M. Rutledge, Director

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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

N.D. Eryou, PhD, PE

Name (please type)

Florida Registration Number 46888

Mailing Address 5051 Castell Drive, Suite 244

Street or P.O. Box

Naples
City

FL
State

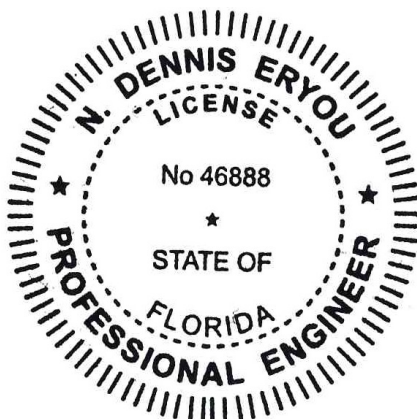
34103
Zip

Date 09/15/2024

E-mail address dennis@eryouengineering.com

Telephone (516) 449-5814

(PLEASE AFFIX SEAL)



This item is digitally signed and sealed by N. Dennis Eryou on the date adjacent to the seal

Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies.



8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division—HWRS, MS4560
2600 Blair Stone Rd. Tallahassee, FL 32399-2400
(850) 245-8707

Date Received
(for FDEP Official Use Only)

EPA ID:

F L D 9 8 2 1 3 3 1 5 9

Please use the instructions document to complete this form
* mandatory fields

1. Reason for Submittal: (all submitters must complete pages 1 and 2 and sign page 7. Pages 3 through 6 - complete as applicable)

Mark 'X' in
the correct box*:

(must choose one
if a notification)

- ☐ To obtain a new EPA ID number (for hazardous waste, universal waste, used oil activities, or PCW activities).
- ☐ To provide updated information for an EPA ID number (to update status and facility identification information).
- ☐ To provide the final information for an EPA ID number (closing). (see instructions—must complete pages 1, 2, 3, 7)
- ☐ To obtain new or updating an EPA ID number for conducting Electronic Manifest Broker activities.
- ☒ Submitting new or revised notification for Part A for permitted facilities.

FL Registration(s)

- ☐ UW Mercury (see page 4) ☐ HW Transporter (see page 5) ☐ Used Oil (see page 6)

2. Facility or Business Name:*

Safety-Kleen Systems, Inc.

3. Facility Physical Location Information: (No P.O. Boxes)

Physical Street Address*:

4426 Entrepot Blvd.

☐ Vessel

City or Town:

Tallahassee

State:

FL

Zip Code:

32310

County*:

Leon

Country (if not USA)*:

4. Facility or Business Mailing Address:

☒ Same address as # 3 above or*:

City or Town*:

State*:

Zip/Postal Code*:

Country (if not USA):

5. Facility North American Industry Classification System (NAICS) Code(s)*: (at least 5 digits)

A. 5 6 2 1 1 2 (required)

B.

C.

D.

6. Facility or Business RCRA Contact Person: ☒ Same address as # 3 above or:

First Name*:

Maggie

Last Name*:

Tenant

Title*:

VP Environmental Compliance

Phone Number*:

734-516-0291

Extension*:

Fax*:

E-Mail*:

maggie.tenant@safety-kleen.com

Street or P.O. Box (or same address box is checked)*:

City or Town*:

State*:

Zip Code*:

Country (if not USA):

RCRA Hazardous Waste Status Notification or Out of Business Notification		EPA ID No.* FLD982133159	
7. Real Property (FL Land) Owner of the Facility's Physical Location (List additional owners in the comments section.)			
Name of Owner*: <div style="text-align: center;">Safety-Kleen Systems, Inc.</div>		Date became Owner*: <u> 1 </u> / <u> 1 </u> / <u> 90 </u> <input type="checkbox"/> New Owner mm dd yy	
Street or P.O. Box (or same address box is checked)*: 42 Longwater Drive		Phone Number*: 781-792-5000	
City or Town*: <div style="text-align: center;">Norwell</div>	State*: <div style="text-align: center;">MA</div>	Zip Code*: <div style="text-align: center;">2061</div>	Country (if not USA):
E-Mail*:			
Owner Type*: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> County <input type="checkbox"/> Other_____			
Comments:			
8. Facility Operator (List additional Operators in the comments section). Same address as # <u> 3 </u> above or:			
Name of Operator*: <div style="text-align: center;">Safety-Kleen Systems, Inc.</div>		Date became Operator*: <u> 1 </u> / <u> 1 </u> / <u> 90 </u> <input type="checkbox"/> New Operator mm dd yy	
Street or P.O. Box (or same address box is checked)*:		Phone Number*:	
City or Town*:	State*:	Zip Code*:	Country (if not USA):
E-Mail*:			
Operator Type*: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> County <input type="checkbox"/> Other_____			
Comments:			
9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):			
(1) Generator of Hazardous Waste <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (This does not include Universal Waste or Used Oil) If YES, Choose only one of the following three categories.			
<input checked="" type="checkbox"/> a. Large Quantity Generator (LQG): - Generates in any calendar month (includes quantities imported by importer site) 1,000 kilograms or greater per month (kg/mo) (2,200 lbs/mo.) of non-acute hazardous waste; or - Generates in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or - Generates in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.			
<input type="checkbox"/> b. Small Quantity Generator (SQG): - Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste and/or no more than 100 kg (220 lbs) of any acute hazardous spill cleanup material.			
<input type="checkbox"/> c. Very Small Quantity Generator (VSQG): - Generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste.			
In addition, indicate other generator activities that apply. <input type="checkbox"/> d. Short-Term Generator (one-time, not on-going) <input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator <input type="checkbox"/> f. United States Importer of hazardous waste <input type="checkbox"/> g. LQG notifying of VSQG Hazardous Waste Under Control of the Same Person pursuant to 40 CFR 262.17(f). (Addendum A Required) <input type="checkbox"/> h. Episodic: Not lasting more than 60 days: <input type="checkbox"/> SQG <input type="checkbox"/> LQG (Addendum B Required) <input type="checkbox"/> i. Electronic Manifest Broker, as defined in 40 CFR 260.10, electing to use EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator.			

9. RCRA Hazardous Waste Activities at this Facility continued: (Mark 'X' in all that apply):

For Items 3 through 9, mark 'X' in all that apply.

- (2) **Treater, Storer, or Disposer of Hazardous Waste** (at your facility—Choose Only One) Note: A hazardous waste permit may be required for this activity.

- ☒ a. Operating Commercial TSD
- ☐ b. Operating Non-Commercial TSD
- ☐ c. Non-Operating: Postclosure or Corrective Action Permit or Order (HSWA, etc.)

- (3) ☐ **Recycler of Hazardous Waste** (at your facility)

Specify: ☐ Commercial ☐ Non-CommercialSpecify: ☐ Stores prior to recycling ☐ Does not store prior to recycling.

Note: A permit may be required for storage prior to recycling.

- (4) ☐ **Exempt Boiler and/or Industrial Furnace**

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

- (5) ☐ **Person Authorized to Manage Very Small Quantity Waste Generated at Other Facilities**

Choose this management activity ONLY if you attach

EITHER a copy of your application for such authorization OR the authorization you received from FDEP.

- (6) ☐ **Receives Hazardous Waste from Off-Site**

- (7) ☐ **Underground Injection Control**

- (8) ☐ **Recognized Trader**—Mark all that apply

☐ a. Importer☐ b. Exporter

- (9) ☐ **Importer/ Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR subpart G**—Mark all that apply

☐ a. Importer☐ b. Exporter**10. Waste Codes for Federally Regulated Hazardous Wastes*:** List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, K019, P012, U112).

Hazardous waste transporters must list codes routinely or usually transported. Use comments or an additional page if more spaces are needed.

¹ D001	² D002	³ D003	⁴ D004	⁵ D005	⁶ D006	⁷ D007
⁸ D008	⁹ D009	¹⁰ D010	¹¹ D011	¹² D018	¹³ D019	¹⁴ D021
¹⁵ D022	¹⁶ D023	¹⁷ D024	¹⁸ D025	¹⁹ D026	²⁰ D027	²¹ D028

11. Other Status Changes (If no longer handling waste or closed, items 9 and 10 should be left blank and items 12-16 skipped):**(A) Central Accumulation Area (CAA) or Facility Closed:**☐ Central Accumulation Area (CAA)☐ Facility Closed (Complete this section only if all business activities at this facility have ceased.)**(B) Closure Dates:**☐ (1) Expected closure date _____ (date in mm/dd/yyyy)☐ (2) Requesting new closure date _____ (date in mm/dd/yyyy)☐ (3) Date of closure: _____ (date in mm/dd/yyyy)☐ a. In compliance with the closure performance standards in 40 CFR 262.17(a)(8)☐ b. Not in compliance with the closure performance standards in 40 CFR 262.17(a)(8)**(C) Property Tax Default** ☐**(D) Petition for Bankruptcy Protection** ☐

Universal Waste Notification and Mercury Transporter/Handler Registration	EPA ID No.* FLD982133159
12. Universal Waste (UW) Activities (Mark 'X' and complete all that apply) :	
A. Federal Notification	
<input type="checkbox"/> Federally Defined Large Quantity Handler (LQH) = Generate/Accumulate: <u>5,000 kg (11,000 lb) or more</u> of any combination of UW accumulated (at any one time) <div style="margin-left: 40px;"> Accumulates: <input type="checkbox"/> a. UW Batteries <input type="checkbox"/> b. Pesticides <input type="checkbox"/> c. Pharmaceuticals <input type="checkbox"/> d. Mercury Containing Devices <input type="checkbox"/> e. Mercury Containing Lamps </div> <input type="checkbox"/> Destination Facility for UW Note: For this activity, a facility must treat, dispose, or recycle a UW. A permit is required for storage prior to recycling.	
B. Florida Universal Pharmaceutical Waste (UPW): one-time notification	
<input type="checkbox"/> Pharmaceuticals LQH = 5,000 kg or more of Universal Pharmaceutical Waste (UPW) accumulated (at any one time) <input type="checkbox"/> Pharmaceuticals Acute LQH = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste (UPW) accumulated (at any one time) <input type="checkbox"/> Reverse Distributor of Universal Pharmaceutical Waste (UPW) (must be permitted with the Florida Department of Business and Professional Regulation [DBPR]) <input type="checkbox"/> Florida Universal Pharmaceutical Waste (UPW) Transporter	
C. Florida Annual Mercury Handler Registration:	
For-hire transporters, transfer facilities, handlers, reclamation and recovery facilities of Mercury-Containing Lamps and Devices operating in the State of Florida are required to register annually with the Department using this section of the form [Chapter 62-737, F.A.C.]. A one-time fee of \$1,000 is required for first time registration as a Large Quantity for-hire Handler of Mercury-Containing Lamps and Devices as detailed in 62-737.400(3)(a)3., F.A.C. (please contact FDEP first). If you <u>only</u> generate lamps and/or devices or manage pharmaceuticals, do not register or complete the information below.	
(1) This form is being submitted as a Florida Registration of Universal Waste Mercury Transporter/Handler <u>for-hire</u> Activities <input type="checkbox"/> 1st Annual Registration <input type="checkbox"/> Annual Renewal <input type="checkbox"/> One-time \$1,000 fee for Mercury for-hire first time LQH registration is attached	
<input type="checkbox"/> For-hire Transporter of Universal Waste Mercury-Containing Lamps or Devices <input type="checkbox"/> For-hire Transfer Facility of Universal Waste Mercury-Containing Lamps or Devices <input type="checkbox"/> Mercury-Containing Devices (thermostats, etc.) SQH = less than 100 kg accumulated by for-hire handler <input type="checkbox"/> Mercury-Containing Lamps SQH = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler	Annual Registration Required
<input type="checkbox"/> Mercury-Containing Devices LQH = 100 kg (220 lb) or more accumulated at any one time by for-hire handler <input type="checkbox"/> Mercury-Containing Lamps LQH = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler	Annual Registration + one-time \$1,000 fee+ More Requirements (contact FDEP)
(2) Mercury Recovery and/or Reclamation Facility (A <u>hazardous waste permit</u> is required for this activity) <input type="checkbox"/> 1st Annual Registration <input type="checkbox"/> Annual Renewal	Annual Registration Required
Briefly Describe your Universal Waste Activities: <input type="checkbox"/> We use Drum Top Bulb Crusher(s).	
13. Other State Regulated Waste Activities: Petroleum Contact Water (PCW) <input type="checkbox"/> Recovery <input type="checkbox"/> Transport [62-740 F.A.C.] Note: A water facility permit may be required for this activity. An annual report is required for a recovery facility pursuant to Rule [62-740.300(5)] F.A.C.	

14. HW Transporter Activities: (Mark 'X' and complete all that apply if you need to register your HW Transporter activities)

Transporters of and Transfer Facilities for Hazardous Waste in the State of Florida are required to register and annually renew their registration. Evidence of casualty/liability insurance pursuant to 62-730.170(2)(a) is required as part of this registration. Transporters and transfer facilities may only begin operations after receiving approval from the Department.

Generators who transport waste only within the boundaries of their facility should NOT register in box 14.A below.

A. HW Transporter Registration Information (must be completed annually and when this information changes)

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

☐ 1. For own waste only

☐ 2. For commercial purposes

☐ 3. Both commercial and own waste

4. Transportation Mode ☐ Air ☐ Rail ☐ Highway ☐ Water ☐ Other - specify _____

B. HW Transfer Facility Registration Information (must be completed annually and when this information changes)

☐ **This facility is a Hazardous Waste Transfer Facility:** (as listed in Item 3) Storage Volume _____

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

Note: Hazardous Waste transfer facilities must comply with the requirements of Rule 62-730.171, F.A.C., and Rule 62-730.182, F.A.C.

The Transfer Facility records required under the provisions of Rule 62-730.171(6), F.A.C., are kept at (check one):

☐ Our mailing (business) address ☐ The site (facility) address

Please enter the EPA ID Number of the HW Transporter who carries the insurance for this Transfer Facility:

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Please see 14.C for additional items to be submitted for registration of a Hazardous Waste Transfer Facility [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

C. The following items are required to be submitted with the initial notification for a **transfer facility** and any changed items must be submitted with any subsequent submission [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)] :

___ Certification by a responsible corporate officer of the transporter facility that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]

___ Evidence of the transporter facility's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]

___ A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]

___ A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]

___ A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]

___ A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]

15. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

☐ **1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories**

See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- ☐ a. College or University
- ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ **2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories**

16. Used Oil and Used Oil Filter Activities: (Mark 'X' and complete all that apply)

Transporters (exemptions in 40 CFR 279.40(a)(1-4)), transfer facilities, processors, off-specification burners, and/or marketers must annually register with the Department using this form. An annual \$100 registration fee is required for all, except used oil (UO) Processors and collection centers.

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

- ☐ If applicable, a check or money order, in the amount of \$100, payable to Florida Department of Environmental Protection is enclosed.
UO Collection Centers must check 16.(2) of this form (not as a registration).

(1) Used Oil Transporter - mark 'X' in all that apply: (occurring in Florida)

☒ a. Transporter (off-site) and noncontiguous locations

☒ b. Transfer Facility

(2) ☐ Collection Center (From businesses, no more than 55 gal per shipment)

(3) ☐ Used Oil Processor (A permit is required.)

(4) ☐ Used Oil Re-refiner (A permit is required.)

(5) ☐ Off-Specification Used Oil Burner
☐ Utility Boiler ☐ Industrial Boiler ☐ Industrial Furnace

(6) Used Oil Fuel Marketer ☐ On-Spec ☐ Off-Spec

(7) Used Oil Filter Management (must annually register)

☒ a. Transporter

☒ b. Transfer Facility

☐ c. Processor (Annual Report Required)

☐ d. End User (see instructions for definition)

(8) The records required under the provisions of Rule 62-710.510, FAC, are kept at (check one):

☐ Our mailing (business) address (as listed in Item 4)

☒ The site (facility) address (as listed in Item 3)

(9) Used Oil Transporters: (Exemptions in 40 CFR 279.40(a)(1-4))

- ALL registered UO transporters must submit an annual report except generators transporting UO from noncontiguous operations within their own company.
- UO transporters transporting off-site over public highways only within their own company must submit proof of insurance.
- UO transporters transporting more than 500 gallons/year must submit proof of insurance annually, and must sign and certify this submission as a certified used oil transporter in section 19 (except those exempted by Rule 62-710.600(1), F.A.C.).

☐ The used oil annual report is attached

☐ Evidence of Liability Insurance pursuant to 62-710.600(2)(e), F.A.C. is attached.

17. Notification of Hazardous Secondary Material (HSM) Activity

(1) ☐ Notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27). **(Addendum C Required)**

(2) ☐ Notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate.
(Addendum C Required)

Required signature page	EPA ID No.* FLD982133159
18. Comments (attach a page if more space is needed): <div style="border: 1px solid black; padding: 10px; min-height: 150px;"> #10: Waste Codes Continued: D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, F005, U002, U019, U035, U043, U044, U052, U056, U058, U069, U122, U169 </div>	
19. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations.	
<input checked="" type="checkbox"/> I certify as a Used Oil Transporter that I am familiar with the applicable Florida and Federal laws and rules governing used oil transportation and have an annual and new employee training program in place covering the applicable used oil rules. Evidence of financial responsibility is demonstrated by the Used Oil Transporter Certificate of Liability Insurance, DEP form 62-730.900(5)(a), F.A.C..	
Signature of owner, operator, or an authorized representative: <div style="font-size: 1.2em; font-weight: bold;">Maggie Tenant</div> <small>Digitally signed by Maggie Tenant Date: 2024.09.10 10:38:35 -04'00'</small>	Date Signed (mm-dd-yyyy): 09/10/2024
Print Name (First, Middle Initial, Last): Maggie A Tenant	Title: VP Environmental Compliance
Organization: Safety-Kleen Systems, Inc.	Used Oil <input checked="" type="checkbox"/>
Email: maggie.tenant@safety-kleen.com	
Signature of owner, operator, or an authorized representative:	Date Signed (mm-dd-yyyy):
Print Name (First, Middle Initial, Last):	Title:
Organization:	Used Oil <input type="checkbox"/>
Email:	
If the person that filled in this form is not the Facility Contact or Operator, please complete the information below: <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> (Name of person completing this form) (Phone Number) (E-mail Address) </div>	

Tab 1

Part I

**APPLICATION FOR A HAZARDOUS WASTE PERMIT
PART I – GENERAL
TO BE COMPLETED BY ALL APPLICANTS**

Please Type or Print

A. General Information [40 CFR Part 270.13 (a)]

1. Type of Facility in accordance with Part 270.13(a)

☒ TREATMENT

- ☐ Tanks ☐ Piles ☐ Surface Impoundment
☐ Incineration ☐ Containment Building
☐ Boiler / Industrial Furnace Type of Unit _____
☒ Miscellaneous Unit Type of Unit Wet Dumpster/Drum Washer

☒ STORAGE

- ☒ Containers ☒ Tanks ☐ Piles
☐ Surface Impoundment ☐ Containment Building
☐ Miscellaneous Unit Type of Unit _____

☐ DISPOSAL

- ☐ Landfill ☐ Land Treatment ☐ Surface Impoundment
☐ Miscellaneous Units Type of Unit _____

2. Type of application [40 CFR Part 270.13 (a)]:

- ☐ Construction Permit
☒ Operation Permit
☐ Construction & Operation Permit
☐ Research, Development & Demonstration (RD&D) Permit
☐ Postclosure Permit
☐ Clean Closure Plan
☐ Subpart H Remedial Action Plan
☐ Corrective Action

3. Revision Number: 0 - 9/15/2024

4. Date Current Operation Began, or is expected to begin: 01 / 01 / 1990

5. Facility Name [40 CFR Part 270.13 (b)] Safety-Kleen Systems, Inc.

6. EPA/DEP I.D. No. FLD 982 133 159

7. Facility Location or Street Address [40 CFR Part 270.13 (b)] 4426 Entrepot Blvd, Tallahassee, FL

8. Facility Mailing Address 4426 Entrepot Blvd.

Street or P.O. Box

Tallahassee

Florida

32310

City

State

Zip

9. Contact Person Maggie Tenant Telephone (734) 516-0291

Title Vice President of Environmental Compliance

Mailing Address 4426 Entrepot Blvd.

Street or P.O. Box

Tallahassee

Florida

32310

City

State

Zip

- Contact E-mail maggie.tenant@safety-kleen.com
10. Operator Name [40 CFR Part 270.13 (d)] Safety-Kleen Systems, Inc.
- Telephone (781) 792 - 5000
- Mailing Address 42 Longwater Dr
- | | | |
|----------------|--------------------|--------------|
| | Street or P.O. Box | |
| <u>Norwell</u> | <u>MA</u> | <u>02061</u> |
| <u>City</u> | <u>State</u> | <u>Zip</u> |
- Operator E-mail maggie.tenant@safety-kleen.com
11. Facility owner's name [40 CFR Part 270.13 (e)] Safety-Kleen Systems, Inc.
- Telephone (781) 792 - 5000
- Mailing address 42 Longwater Dr
- | | | |
|----------------|--------------------|--------------|
| | Street or P.O. Box | |
| <u>Norwell</u> | <u>MA</u> | <u>02061</u> |
| <u>City</u> | <u>State</u> | <u>Zip</u> |
- E-mail address maggie.tenant@safety-kleen.com
12. Legal structure [40 CFR Part 270.13 (d)]
- ☒ Corporation ☐ Non-profit corporation ☐ Partnership ☐ Individual
☐ Local government ☐ State government ☐ Federal government ☐ Other
13. If an individual, partnership, or business is operating under an assumed name, specify the county and state where the name is registered.
- County _____ State _____
14. If the legal structure is a corporation, indicate the state of incorporation.
- State of Incorporation Wisconsin
15. If the legal structure is an individual or partnership, list the owners.
- Name _____
- Address _____
- | | | | | |
|--|--------------------|------|-------|-----|
| | Street or P.O. Box | City | State | Zip |
|--|--------------------|------|-------|-----|
- Name _____
- Address _____
- | | | | | |
|--|--------------------|------|-------|-----|
| | Street or P.O. Box | City | State | Zip |
|--|--------------------|------|-------|-----|
16. Site Ownership Status
- Owned ☒ To be purchased To be leased _____ years
 Presently leased; the expiration date of the lease is ____/____/____.

Revision Number
Date
Page of

If leased, indicate land owner's name. _____

Address _____
 Street or P.O. Box City State Zip

E-mail address _____

17. Name of Engineer N.D. Eryou, PhD, PE Registration No. 46888

Address 5051 Castell Drive, Ste 244 Naples FL 34103
 Street or P.O. Box City State Zip

Associated with: Eryou Consulting Engineers

18. Is the facility located on Tribal land [40 CFR Part 270.13 (f)]? ☐ Yes ☒ No

19. Existing or pending environmental permits (attach a separate sheet, if necessary):
 [40 CFR Part 270.13 (k)]

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
HW Permit	FDEP	009207-011-HO	2-26-2020	3-14-2025
UO/Filter Trans	FDEP	FLD982133159	3/7/2024	6-30-2025
HW Trans	FDEP	FLD982133159	3/12/2024	6-30-2025
Lamps/Mercury	FDEP	FLD982133159	1/31/2024	3/1/2025

B. Site Information [40 CFR Part 270.13 (b)]

1. The facility is located in Leon county.

The nearest community to the facility is Tallahassee.

Latitude 30°23'07.51"N Longitude 84°19'30.86"W

Method and datum Google Earth

2. The area of the facility site is 2.3 acres.

3. Attach a scale drawing and photographs of the facility showing the location of all past, present, and future treatment, storage and disposal areas. Include photographs and the locations of all Solid Waste Management Units and Areas of Concern. Also, show the hazardous wastes traffic pattern including estimated volume and control [40 CFR Part 270.13 (h)].

4. Attach a topographic map which shows all the features indicated in the instructions for this part.

5. Is the facility located in a 100-year flood plain? ☐ Yes ☒ No

6. The facility complies with the wellhead protection requirements of Chapter 62-521, F.A.C.

☒ Yes ☐ No

C. Land Use Information

- The present zoning of the site is Light Industrial (LI).
- If a zoning change is needed, what should the new zoning be? _____.

D. Operating Information

- Is waste generated on-site? ☒ Yes ☐ No
- List the NAICS codes (5 to 6 digits) [40 CFR Part 270.13 (c)] 562112 _____

- Use the codes and units provided in the instructions to complete the following table. Specify [40 CFR Part 270.13 (i and j)]:
 - Each process used for treating, storing or disposing of hazardous waste (including design capacities) at the facility, and;
 - The hazardous waste(s) listed or designated in 40 CFR Part 261, including the annual quantities, to be treated, stored, or disposed by each process at the facility.

PROCESS CODE	PROCESS DESIGN CAPACITY AND UNITS OF MEASURE	HAZARDOUS WASTE CODE	ANNUAL QUANTITY OF HAZARDOUS WASTE AND UNITS OF MEASURE
See Part I.D.3			

- A brief description of the facility [40 CFR Part 270.13 (m)]:

Please see Part I.D.4
- For hazardous debris, a description of the debris category(ies) and contaminant category(ies) to be treated, stored or disposed of at the facility [40 CFR Part 270.13 (n)]:

Please see Part I.D.5

Part I

B. Site Information (40 CFR Part 270.13(b))

3. FACILITY LAYOUT AND TRAFFIC PATTERNS (40 CFR Part 270.13(b))

Figure 2.1-1, found at the end of Part I, is a scale drawing showing the facility layout. Site photographs are provided in Appendix A at the end of the permit application. The non-building areas of the facility are paved with asphalt or concrete as noted on Figure 2.1-1.

Figure 2.1-2, found at the end of Part I, shows the site traffic patterns. Estimated annual volumes of hazardous wastes moving through the facility are found on page 3 (Process – Codes and Design Capabilities). The majority of the vehicular traffic enters and exits the facility through a mechanically operated gate on the southeast side of the facility. One additional manually operated gate is located on the northeast side of the facility.

Loading/unloading operations of containerized waste occurs at the concrete dock area (Area C). Approximately once per week a tractor trailer removes containerized waste for transfer to a Safety-Kleen or Clean Harbors TSDF. This truck backs up to the concrete dock, located on the northern side of the facility in Area C, to load waste containers and unload product. Local facility route trucks may also load and unload containerized waste on the northern side of the Return/Fill Shelter (Area A). The trucks dispatched from the recycle center to deliver parts washer solvent and pick up used parts washer solvent will perform these activities at the above-ground tank truck loading area (Area B) approximately once every 20 days. Used oil loading/unloading also occurs in Area B. Truck-to-building transfer of Fluid Recover Service (FRS) wastes will occur on asphalt or concrete surfaces within the compound (Areas A, B, and C).

Capital Circle SW is the major access road to the facility. This access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The facility route trucks that travel the routes between the branch and customers use the two-lane road within the industrial park (Entrepot Blvd.).

Traffic from this facility is not expected to have a major effect on local traffic conditions. The facility and adjacent facilities have been in operation since at least 1990. The roads have been able to sustain the loads being transported over them since operations began.

Part I

B. Site Information

4. SITE TOPOGRAPHY AND SURROUNDING LAND USE

Figure 2.2-1 is a USGS topographic map showing the facility. Due to the small size of the site, all of the information requested in FDEP's application form cannot be placed on one map. Therefore, additional maps are provided here to present the additional information requested in the application form.

5. 100-Year Floodplain Area

Based on information available (Figure 2.2-2), the facility does not lie within the 100, or 500-year flood plain.

Surface Water Bodies Within One-Quarter Mile of the Facility Property Boundary (e.g., Intermittent Streams and Springs)

Lake Bradford is located 0.55 miles to the west-northwest of the facility, Munson Slough is located 1.0 mile to the southeast, and Black Swamp is located 0.30 miles to the northeast of the site (Table 2.2-1).

Surrounding Land Uses

Surrounding land uses are shown in Figure 2.2-3.

Legal Boundaries of the Facility

Figure 2.2-4 shows the property boundaries.

Part I**D. Operating Information****3. Process – Codes and Design Capacities (40 CFR Part 270.13(i)(j))**

Waste Type	Process Design Capacity (Gallons)	Process Code(s)	Estimated Annual Amount (Tons)*****	Waste Codes
Spent Parts Washer Solvent	15,000	S02**	384	D001 and D-codes listed in Note below
Spent Parts Washer Solvent	6,912	S01*	384	D001 and D-codes listed in Note below
Branch-Generated Liquids Solids (Debris)	6,912	S01*	4	D001 and D-codes listed in Note below; F002, F003, F005
Dumpster Sediment	6,912	S01*	Included above	D001 and D-codes listed in note below
Tank Bottoms	6,912	S01*	Included above	D001 and D-codes listed in note below
Used Immersion Cleaner (IC 699)	6,912	S01*	6	D-codes listed in note below
Dry Cleaning Waste (Perchloroethylene)	6,912	S01*	5	F002 and D-codes listed in note below
Dry Cleaning Waste (Non-perchloroethylene)	6,912	S01*	Included above	D001 and D-codes listed in note below
Paint Wastes	6,912	S01*	18	D001, F003, F005 and D-codes listed in note below
Retain Samples From Used Oil Operations	6,912	S01*	2	D008, D018, D039, D040
Spent Aerosol Cans	6,912	S01*	< 1	D001, D035
Fluid Recovery Service (FRS) Transfer Wastes	8,800	S01***	100	Transfer wastes-waste codes assigned by generator ****
Aqueous Brake Cleaner	8,800	S01***	8	Transfer wastes – none, unless assigned by generator.
Mercury-Containing Lamps/Devices	Not Applicable	Not Applicable ***	Less than 2.2	Not Applicable -handled as non-hazardous transfer wastes

NOTES:

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

* This waste will be stored in containers in the warehouse container storage. The maximum capacity in the warehouse container storage area for hazardous waste is 6,912 gallons.

** The RCRA-Permitted Hazardous Waste Tank (Used Solvent) has a capacity of 15,000 gallons and may be filled to 14,250 gallons

*** This waste will be held for transfer in containers in the transfer waste area(s). There is one transfer waste area located inside the warehouse and a designated mercury bulb storage area in the container storage area.

**** Various D-Codes, F-Codes, K-Codes, P-Codes, U-Codes may be accepted for 10-day storage and transfer

***** Based on historical amounts of waste accepted at the facility.

Part I

D. Operating Information

4. Description of the Facility/Nature of the Business (40 CFR Part 270.13(m))

Safety-Kleen Systems, Inc. of Norwell, MA is an international, service-oriented company whose customers are primarily engaged in automotive repair and industrial maintenance. In addition, the customer base for transfer waste includes national retail chains, paint and autobody customers, aerospace aviation companies, dry cleaners, industrial maintenance, repair & cleaning, industrial equipment suppliers, steel mills, metal fabricators, food and beverage distributors, tobacco manufacturers, and packing manufacturers. Since 1968, Safety-Kleen has been offering a leasing service for petroleum-based hydrocarbon solvents and small parts washing equipment.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the Branch to the customer, from the customer to the Branch, from the Branch to the recycle facility, and then from the recycle center back to the Branch for redistribution to customers. This closed loop supplies Safety-Kleen with most of its solvent requirements (nearly two-thirds of the clean solvent delivered to the field has been previously used by its customers). Ownership of the solvent remains with Safety-Kleen. Solvent containers (product and waste) are transported in specially-equipped, enclosed route trucks. Five aboveground tanks are located at the Safety-Kleen Tallahassee facility. These tanks are used for the storage of: one (15,000-gallon) hazardous waste (used parts washer solvent), two (15,000-gallon) used oil, one (15,000-gallon) clean product 150 premium parts washer solvent and one (8,000-gallon) used antifreeze tank. The 15,000-gallon tanks are located inside the permitted tank storage unit. See figure 2.1-1.

The Safety-Kleen parts washing equipment, together with the solvents, are leased to customers; the leasing charge includes regularly scheduled solvent changes and machine maintenance. The business is conducted from local Branches (sales branches) located in 45 states. The Branches warehouse the products and equipment required to service the customers in their sales areas. On a contractual basis, service representatives furnish clean solvent to the customers, pick up the used solvent, and ensure that the leased equipment is in good working order. In 1979, Safety-Kleen expanded their scope of operations to make their solvent leasing service available to owners of parts cleaning equipment, regardless of manufacturer, using Safety-Kleen's solvents.

Basically, Safety-Kleen handles two types of parts washers. The original service offered by the company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a container of parts washer solvent. On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the container of used solvent with one of clean product. Safety-Kleen has also established a parts cleaner service for users who own their machines. This service provides a solvent reclamation service to these customers regardless of machine model. All clean parts washer solvents are delivered to customers in containers. All spent parts washer solvents are transported from the customer to the Branch in containers.

Upon return of the used parts washer solvent to the branch, the material is transferred from the containers to a wet dumpster located inside the Return/Fill Shelter. Most of the 150 premium parts washer solvent used by customers will be utilized by the Branch for the washing of used parts washer containers. After used parts washer containers have been washed, the spent solvent is pumped from the wet dumpsters via piping to the RCRA-Permitted Hazardous Waste Tank (Used Solvent). Cleaned containers are filled with product 150 premium parts washer solvent in preparation for the next day's services in the Return/Fill Shelter. Periodically (approximately every 20 days), a tanker truck is dispatched from one of the Safety-Kleen TSDF's to deliver a load of clean solvent and collect the used parts washer solvent (hazardous waste) at the Branch. Containers of clean solvent may be stored at the return/fill shelter or in the permitted storage areas. Containers of used parts washer solvent are normally transferred and dumped into the wet dumpsters each day after trucks return from services but may be stored in the permitted container storage area in the event they are not dumped after return to the branch on a specific day.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container of the immersion cleaner. The spent immersion cleaner solvent remains in the container after delivery to the Branch, where it may be stored in the 10-day transfer areas, or permitted container storage area, of the warehouse. Weekly, a tractor trailer truck is dispatched from a Clean Harbors/Safety-Kleen TSDF to deliver clean immersion cleaner solvent and collect the

containers of spent immersion cleaner solvent for reclamation. Warehouse space is dedicated for the storage of clean immersion cleaner. The immersion cleaner remains in the original covered containers during transfer between the Branch and the TSDF's.

Safety-Kleen provides a dry-cleaning waste reclamation service where containers of dry-cleaning wastes are collected and stored temporarily at the Branch before shipment to the permitted TSDF's for reclamation and processing. Dry cleaning wastes may be managed as permitted or 10-day transfer wastes. All dry-cleaning wastes remain in their original containers while at the Tallahassee facility.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and stored temporarily at the Branch before shipment to permitted Safety-Kleen/Clean Harbors TSDF for reclamation and processing. Paint wastes may be managed as permitted or 10-day transfer wastes. The customer base of 10-day transfer wastes at the Safety-Kleen Tallahassee Branch include Industrial Maintenance, Repair & Cleaning, Industrial Equipment Suppliers, Steel Mills, Metal Fabricators, Food Distributors, Beverage Distributors, Tobacco Manufacturers, Packing Manufacturers and Retail. All paint wastes remain in their original containers while at the Tallahassee facility.

Fluid Recovery Services (FRS) is a containerized waste service (CWS) program managed by the Safety-Kleen Tallahassee Branch to collect and transfer various other containerized hazardous, and non-hazardous wastes to the appropriate Clean Harbors/Safety-Kleen TSDFs for processing. Hazardous wastes managed under this program are managed as 10-day transfer wastes. Examples of the types of waste that may be received from FRS customers include, but are not limited to:

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naphtha, etc.;
- Lubricating oils, hydraulic oils, synthetic oils, used antifreeze, and machine oils;
- Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane;
- Photographic and x-ray related wastes, acids;
- Paint and lacquer thinners, acids/bases;
- Various returned/damaged/expired products from national retail chains. These are typical household products that may carry U-Codes due to being unused

commercial chemical products;

- Other hazardous and nonhazardous halogenated and nonhalogenated wastes.

Note: All waste containers, including the tanker trucks, are unloaded within 72 hrs. of arrival at the facility and are shipped outbound within 72 hrs. of being loaded for shipment.

10-Day Transfer Storage Areas

10-day transfer container storage takes place in the northeastern portion of the main warehouse depicted in figure 2.1-1 at the end of this section. Signage clearly marks this area as 10-day transfer storage and it is separated from the permitted container storage area. If additional space is needed, transfer wastes may be stored in the permitted container storage area for short periods of time. All hazardous waste containers located in the 10-day transfer area(s) are manifested and in-transit to other permitted facilities. Safety-Kleen Tallahassee is not the designated facility for wastes located in the 10-day transfer area(s). Safety-Kleen tracks the 10-day transfer limit through its' Corporate electronic system. Transfer wastes delivered to the facility are documented into a "virtual hub" which shows the manifest or bill of lading number, designated facility, number of containers, and hub receipt date. In the case of Safety-Kleen Tallahassee's transfer waste activities, the Corporate virtual hub is identified with the letters "TALH". All personnel have access to this database and can track the number of days each container has been at the facility. In addition, the facility waste tracking information can be accessed by running a "Hub Waste Transfer Report", and this report can be run for any time period. This report will show the generator name, EPA ID number if applicable, address, hub (transfer facility) receive date, hub (transfer facility) outbound ship date, and manifest number or shipping document. The "Hub Waste Transfer Report" complies with all elements of 62-730.171(6)(a) and includes all generator statuses in the report. This report is maintained electronically for at least three years.

Safety-Kleen offers a service for the collection of bulk used oil commonly referred to as Safety-Kleen Oil Services (SKOS). Safety-Kleen Tallahassee is a registered Used Oil and Used Oil Filter Facility. Straight tanker trucks are used to collect and transport bulk used oil. After collection, the used oil is transported to the branch and off-loaded into one of the used oil storage tanks. From there, the used oil is typically transported to the Safety-Kleen Systems, Inc. Pompano Beach/Ocala oil terminal for storage until being

loaded onto railcars. The used oil is then typically transported via rail to the Safety-Kleen East Chicago, Indiana re-refinery for processing. Used oil is subject to specific acceptance criteria prior to collection and divided into three (3) groups.

Group 1 used oils are derived from automotive sources (auto maintenance, auto retail, dealerships, fleet rental & leasing, quick lubes, marine transportation, mechanical & equipment service, taxi/bus/other local transportation, airlines, railroads, trucking & transportation companies, utilities – natural gas & propane distribution, telecommunications/cable, and water/sewer, etc.) Prior to collection, used oil at these sites is field tested using a TIF Halogen Leak Detector. Used oil failing the TIF test for SQG/LQG generators will then be tested using the Dexsil Clor-D-Test kit. Used oil passing this test may be collected, and used oil failing this test may not be collected. It may be collected at a later date, provided a sample of the used oil has passed the rebuttable presumption for used oil using an analytical method from SW-846.

Group 2 used oils are derived from non-automotive sources and may be acceptable if they receive approval from the Central Profile Group (CPG). Examples of group 2 oil sources are: (utility – electrical distribution/power generation, agricultural production, chemical manufacturing/distribution, electrical equipment & computer manufacturers, exploration – drilling/seismic, fabricated metal products, manufacturers – furniture/millwork/cabinets, fixtures/machine (including medical)/miscellaneous, mining/minerals, primary metal manufacturing, natural gas pipeline/processing, manufacturers – plastic/rubber/glass, oil & gas producers, oilsands mines/SAGD facilities, food & kindred products, manufacturers – asphalt/paper products & packaging materials/shoe/leather/textiles & apparel, printing, lumber/wood products, lumber mills, pulp & paper mills, biotechnology, pharmaceutical, refineries, ship builders, steel mills, asphalt terminal, liquid/petroleum, pipeline, liquid/petroleum terminal, manufacturers – transportation equipment, etc.) Group 2 used oils require a pre-qualification sample to be taken and submitted for analysis (Flash point, PCB's, Halogens, Silicone, and VOC's). Pre-qualification results must be approved prior to initial collection. If the generating process changes, or if no oil is picked up for over one year, a pre-qualification sample must be submitted for approval again. Field testing procedures are the same as the above group 1.

Group 3 are any oils not falling into the Group 1/2 categories and will not be accepted into the SKOS program. Examples of Group 3 oils are, but not limited to: (electrical insulating oil/transformer oil, gasoline, form release oil, rust preventatives, silicone heat transfer fluid, hydraulic oil dye, diesel fuel treatment, motor flushes, penetrating oil, kerosene, cooking oil, crude oil, distillate fuels, animal fats, TSCA regulated oils, urethane coating, etc.)

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. All antifreeze is collected by Safety-Kleen with the intent of it being recycled. At the customer's location, Safety-Kleen pumps waste ethylene glycol (antifreeze) into a dedicated compartment of a Safety-Kleen used oil tanker truck. This truck transports the used antifreeze (glycol) to the Tallahassee branch, for off-loading into dedicated tanks, storage totes or containers. The glycol is then sent to a recycler for processing into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's *the Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. The Florida Department of Environmental Protection (FDEP) has determined this waste stream can be handled as non-hazardous as long as it is destined for recycling. If used antifreeze collected by the Safety-Kleen Tallahassee facility is sent to a facility other than the East Chicago re-refinery it will be managed as follows. If the glycol percentage is not acceptable at a glycol recycling facility, then a representative sample will be taken and sent for TCLP analysis to determine if it is a hazardous waste. It will be managed properly according to the TCLP analysis result. In addition, Safety-Kleen sells its' own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is then shipped to SK distribution centers, and then shipped to a recycler.

In 1996, the Branch became registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the requirements of Florida Administrative Code (FAC) 62-737.400. As a registered small quantity handler of universal waste lamps/mercury devices, the Branch can store up to 2,000 kg of lamps or 100 kg of mercury devices at any one time. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as non-hazardous transfer wastes. The boxes are stored at

the Branch in a designated area. All containers (boxes) are labeled in accordance with FAC 62-737.400(5)(b) and are partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic. Safety-Kleen also manages universal waste batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting these standards may be managed as 10-day transfer hazardous waste. Universal waste lamps, mercury devices & batteries are stored inside the transfer waste areas.

Safety-Kleen offers a Vacuum Services Program. This program is for the collection of non-hazardous waste streams, both liquid and solids/sludges. The Tallahassee branch operates this program with straight tanker trucks that hold approximately 3,500 gallons of material. The primary services offered under this program are:

- Clean-out of oil/water separators, sumps, pits, and trench drains;
- Pumping of open-top drums and other containers of material already removed from oil/water separators, sumps, pits, and trench drains;
- Pumping of other containers of material as approved on a case-by-case basis;
- Transfer of approved pre-qualified non-hazardous materials from one point to another (ex: from pit to containers). Materials collected under this program are shipped to a permitted wastewater treatment facility for processing.

Containers of hazardous waste are picked up at customer locations and transported back to the Branch in route trucks. All hazardous materials collected and transported to the Safety-Kleen Tallahassee branch are properly packaged in USDOT authorized packages. The types of container will depend on the material, and requirements found in 49 CFR Part 173 for authorized packaging. For example:

- Used parts washer solvent – 5, 15, 30, 55-gallon containers (metal drums DM)
- Dry-cleaning wastes (Perchloroethylene) – 15, 30-gallon containers (plastic/poly drums DF)
- Dry-cleaning wastes (Petroleum-Naphtha) – 15,30-gallon containers (metal drums DM)
- Paint Related wastes – 5, 15, 30, 55-gallon containers (metal drums DM)
- Immersion Cleaner wastes – 15-gallon containers (metal drums DM)

- Used Antifreeze – 55-gallon containers (metal drums DM, or poly drums DF)

Transfer wastes are containerized and transported after identifying the proper shipping name and consultation with authorized packaging requirements found in 49 CFR Part 173.

Each route truck is equipped with a hand-truck and electric lift gate for movement of containers. Upon arrival at the Branch, containers are off-loaded at the dock (Area C, figure 2.1-2) from route trucks and placed on pallets. Containers of used parts washer solvent are unloaded at Area C, or on the northern side of the Return/Fill Shelter (Area A) dock to await dumping by hand into the wet dumpster, then drum washing. As used parts washer drums are dumped into the wet dumpster the used parts washer solvent is transferred via piping to the RCRA-Permitted Hazardous Waste Tank (Used Solvent). All other containerized wastes are moved from the unloading areas on pallets to the appropriate permitted storage area(s) or 10-day transfer waste area(s). Forklifts are used for loading containerized hazardous/non-hazardous wastes onto the weekly tractor trailer truck for transfer to Clean Harbors/Safety-Kleen TSDF's. These containers will be moved directly onto the truck, which will be parked at the concrete loading dock of the warehouse building (Area C, figure 2.1-2).

Part 1**D. Operating Information****5. Hazardous Debris (40 CFR Part 270.13(n))**

The Safety-Kleen Tallahassee branch does not treat, store, or dispose of any hazardous debris, as defined in 40 CFR Part 268.2(g), at the facility.

Personal Protective Equipment (PPE) Requirements at the Branch

The following PPE is required for all persons working at or visiting the branch.

Task	Gloves	Uniform	Apron	Foot Wear	Safety Glasses	Hard Hat	Hearing	Respirator
Material handling-containers (bulk/non-bulk)	Yes (Cr)*	Yes		ST w/M	Yes	Yes		
Return/Fill Operations	Yes (Np)	Yes	Yes	ST w/M	Yes	Yes	Yes w/pneumatic tools	
Tank Truck Load/Unload	Yes (Np)	Yes		ST w/SR	Yes	Yes		
Spill Response (incidental)	Yes (Np)	Yes	Yes	ST w/SR	Yes	Yes		APR- HF/FF/Org. vapor/acid gas
Visitor in Operational areas				Closed toe	Yes	Yes		

Gloves: Cr = cut resistant, (Cr)* = cut resistant (if chemical present – supported

Neoprene glove,

Np = Supported Neoprene Glove (outer)

Hard Hat: hard hats to be available at all times, and used when in operational areas

Apron: Tychem QC apron

Footwear: ST w/M = steel toes with metatarsal guard, ST w/SR = steel toes with slip resistant soles

Respirator/Cartridge Type: APR (air purifying respirator) HF (half face) FF (full face)
Organic vapor/acid gas – cartridge type

Safety-Kleen constructed the Tallahassee Branch with the intent that it will be a long-term facility for the distribution of Safety-Kleen products. No on-site disposal activity occurs at the facility and, hence no disposal capacity will be exhausted that will necessitate closure of the facility.

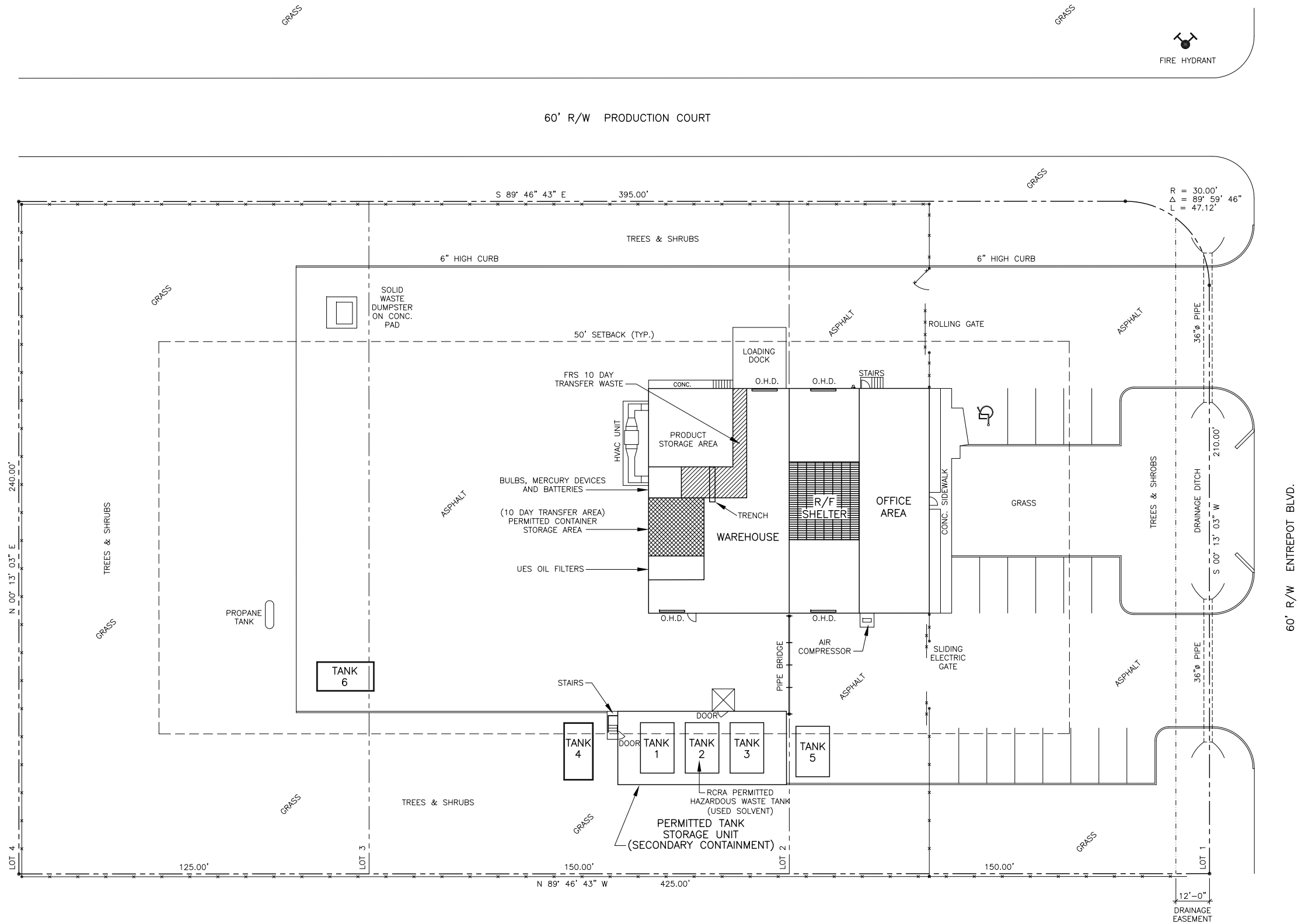


FIGURE 2.1-1

GENERAL NOTES

1. ALL TANKS ARE ABOVE GROUND STORAGE TANKS (AST'S).

LEGEND

--- FENCING
--- PROPERTY LINE
O.H.D. OVERHEAD DOOR
GRATING

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	15,000 USG	USED OIL	HORIZONTAL TANK
2	15,000 USG	USED SOLVENT	RCRA PERMITTED HAZARDOUS WASTE HORIZONTAL TANK
3	15,000 USG	USED OIL	HORIZONTAL TANK
4	12,000 USG	CLEAN 150 SOLVENT	HORIZONTAL TANK ON CONCRETE PIERS
5	8,000 USG	USED ANTI FREEZE	HORIZONTAL TANK
6	7,000 USG	NON HAZ. VAC WASTE	HORIZONTAL TANK

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	ISSUED FOR PERMIT	JEK	JZ	JZ	08/30/24

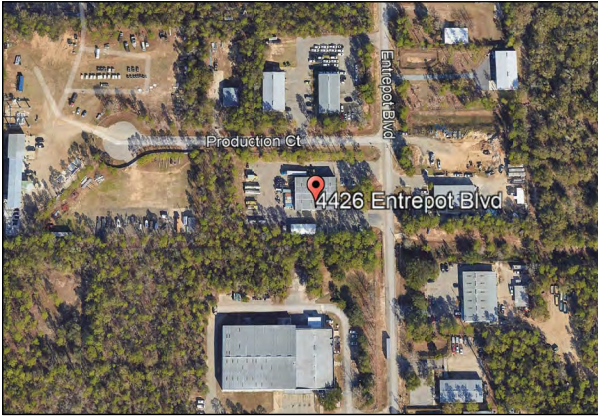
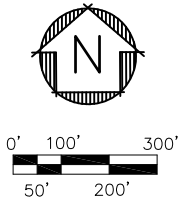
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TITLE **FACILITY LAYOUT & ACCESS CONTROL FEATURES**
4426 ENTREPOT BLVD.
TALLAHASSEE, FL. 32310


SAFETY-KLEEN SYSTEMS, INC.
42 LONGWATER DRIVE, NORWELL, MA. 02061
PHONE: 781-792-5000

SCALE 1"=20'-0"	BY JEK	CHKD JC	APPROVED JC	EHS	DATE 1/16/23
SERVICE CENTER LOCATION TALLAHASSEE, FL.			SC-DWG NUMBER 7094-SP00-001		REV. NO. A



ENLARGED FACILITY MAP

- NOTES:
- ELEVATIONS BASED ON:
GOOGLE ELEVATION DATA SET (WORLD GEODETIC SYSTEM OF 1984. THE DATA SET USES THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88) FOR VERTICAL CONTROL OF ELEVATION.
 - THE PROJECT IS LOCATED IN ZONE "X" BASED ON FEMA PANEL 40109C0270H - EFF DATE 12/18/2009

						TITLE SITE TOPO MAP 4426 ENTREPOT BLVD. TALLAHASSEE, FL. 32310							
						 SAFETY-KLEEN SYSTEMS, INC. 42 LONGWATER DR. NORWELL, MA. 02061 PHONE 781-792-5000							
A	ISSUED FOR PERMIT			JEK	JZ	JZ	090424	SCALE 1"=200'-0"	BY JEK	CHKD JZ	APPROVED JZ	OPERATIONS JZ	DATE 9/4/24
	DESCRIPTION			BY	CHK	APPR	DATE	SERVICE CENTER LOCATION		SC-DWG NUMBER		REV. NO.	
REVISIONS								TALLAHASSEE, FL		7094-SP00-026		0	

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The community map repository should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations (BFEs)** and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or floodplain management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stillwater Elevations tables in the Flood Insurance Study report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations tables should be used for construction and/or floodplain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study report for this jurisdiction.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures for this jurisdiction.

The **projection** used in the preparation of this map was HARN State Plane Florida North. The **horizontal datum** was NAD 83, GRS80 spheroid. Differences in datum, spheroid, projection or State Plane zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same **vertical datum**. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at <http://www.ngs.noaa.gov> or contact the National Geodetic Survey at the following address:

NGS Information Services
NDA, NNGS12
National Geodetic Survey
SSMC-3, #5202
1315 East-West Highway
Silver Spring, Maryland 20910-3282
(301) 713-3242

To obtain current elevation, description, and/or location information for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at (301) 713-3242, or visit its website at <http://www.ngs.noaa.gov>.

Base map information shown on this FIRM was derived from digital orthophotography collected for the Florida Department of Revenue in 2007. The imagery was produced at a scale of 1:2,400. Additional base map information was provided by Tallahassee-Leon County GIS.

Based on updated topographic information, this map reflects more detailed and up-to-date **stream channel configurations** and **floodplain delineations** than those shown on the previous FIRM for this jurisdiction. As a result, the Flood Profiles and Floodway Data tables in the Flood Insurance Study Report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on this map. Also, the road to floodplain relationships for unreviewed streams may differ from what is shown on previous maps.

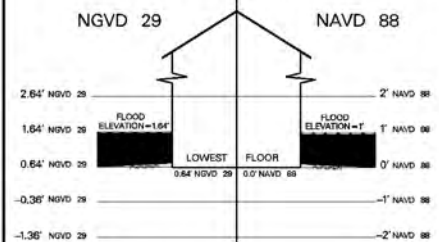
Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels, community map repository addresses, and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

Contact the **FEMA Map Service Center** at 1-800-358-9616 for information on available products associated with this FIRM. Available products may include previously issued Letters of Map Change, a Flood Insurance Study report, and/or digital versions of this map. The FEMA Map Service Center may also be reached by Fax at 1-800-358-9620 and its website at <http://imac.fema.gov>.

If you have **questions about this map** or questions concerning the National Flood Insurance Program in general, please call 1-877-FEMA MAP (1-877-336-2627) or visit the FEMA website at <http://www.fema.gov>.

DATUM CONVERSION SCHEMATIC



LEGEND

SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AD, AR, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevation determined.
- ZONE AE** Base Flood Elevation determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevation determined.
- ZONE AD** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently identified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevation determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevation determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevation determined.

FLOODWAY AREAS IN ZONE AE
The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS
ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

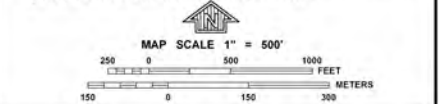
OTHER AREAS
ZONE X Areas determined to be outside the 0.2% annual chance floodplain.
ZONE D Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS
OTHERWISE PROTECTED AREAS (OPAs)
CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

- 1% annual chance floodplain boundary
- 0.2% annual chance floodplain boundary
- Floodway boundary
- Zone D boundary
- CBRS and OPA boundary
- Boundary dividing Special Flood Hazard Area Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.
- Base Flood Elevation line and value; elevation in feet
- Base Flood Elevation value where uniform within zone; elevation in feet

- * Referenced to the North American Vertical Datum of 1988
- Cross section line
- Transient line
- Geographic coordinates referenced to the North American Datum of 1983 (NAD 83), Western Hemisphere
- 1000-meter Universal Transverse Mercator grid values, zone 18
- 5000-foot grid ticks: Florida State Plane coordinate system, North zone (FIPSZONE 9903), Lambert Conformal Conic projection
- Bench mark (see explanation in Notes to Users section of this FIRM panel)
- DX5510 x
- MAP REPOSITORY
- Refer to listing of Map Repositories on Map Index
- EFFECTIVE DATE OF COUNTYWIDE FLOOD INSURANCE RATE MAP
- November 19, 1997
- EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL
- August 18, 2009 - to update corporate limits, to change Base Flood Elevations and Special Flood Hazard Areas, and to incorporate previously issued Letters of Map Revision

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.
To determine if flood insurance is available in this community, contact your Insurance agent or call the National Flood Insurance Program at 1-800-638-6620.



NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0289F

FIRM

FLOOD INSURANCE RATE MAP

LEON COUNTY, FLORIDA AND INCORPORATED AREAS

PANEL 289 OF 490

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

COMMUNITY	NUMBER	PANEL	SUFFIX
LEON COUNTY	120143	0289	F
TALLAHASSEE CITY OF	120144	0289	F

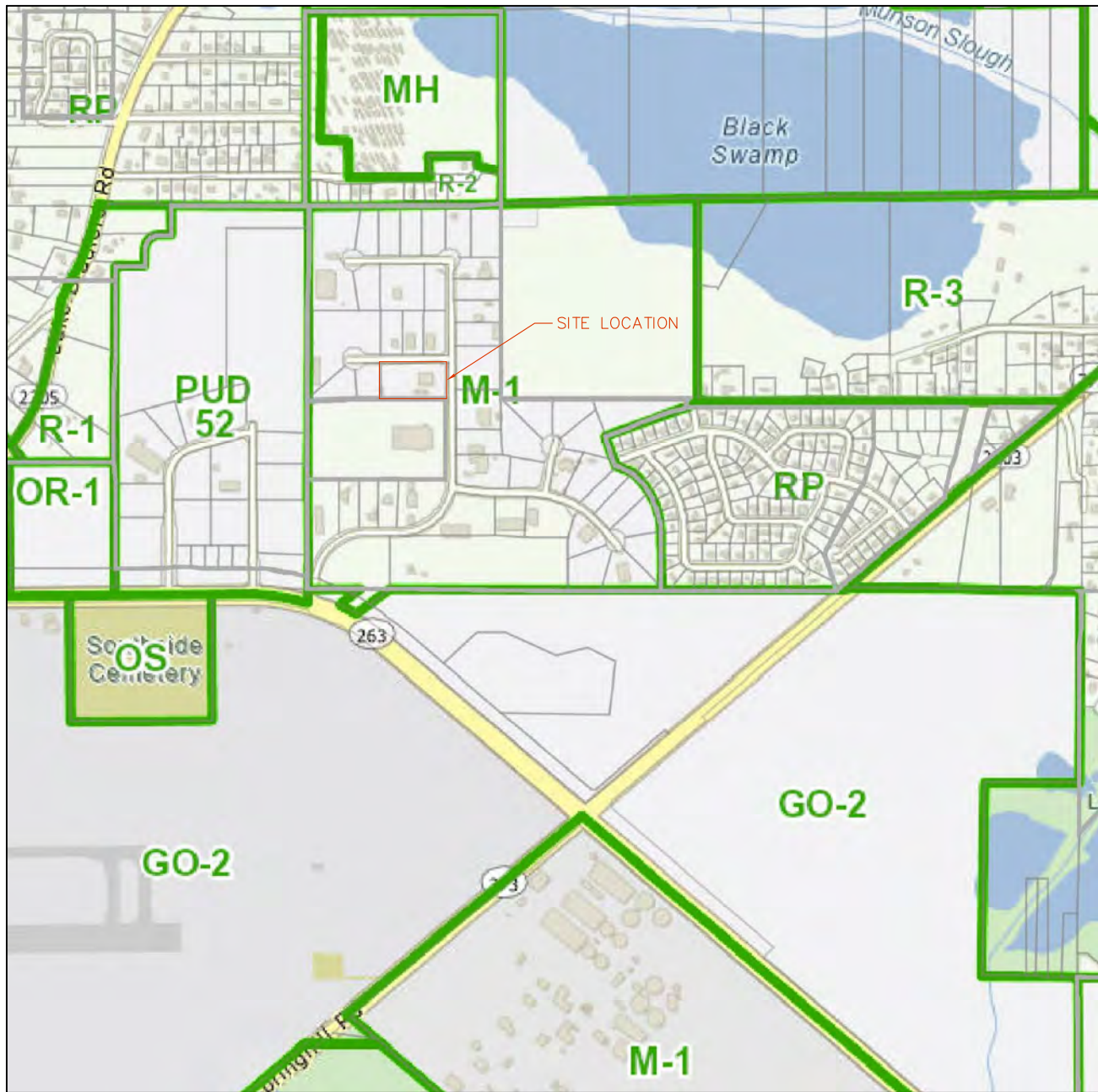
Notice to User: The Map Number shown below should be used when placing map orders. The Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER
12073C0289F

MAP REVISED
AUGUST 18, 2009

Federal Emergency Management Agency

Figure 2.2-2



SOURCE: TALLAHASSEE/LEON COUNTY GIS DATED 8/29/24

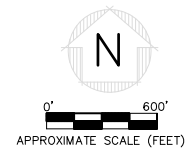


FIGURE 2.2-3

LEGEND	PROPRIETARY STATEMENT	SURROUNDING LAND USES 4426 ENTREPOT BLVD. TALAHASSEE FL. 32310					
M1 LIGHT INDUSTRIAL MH MANUFACTURED HOME PARK OR-1 OFFICE/RESIDENTIAL LOW DENSITY OS OPEN SPACE PUD PLANNED UNIT DEVELOPMENT R-1/R-2 SINGLE FAMILY DETACHED HOUSES GO-2 GOVERNMENT OPERATION RP RESIDENTIAL PRESERVATION RP-1 RESIDENTIAL PRESERVATION 1 R-5 MFG. HOME AND SINGLE FAMILY RESIDENTIAL	THIS DRAWING IS THE EXCLUSIVE PROPERTY OF SAFETY-KLEEN CORP. AND IS PROPRIETARY AND CONFIDENTIAL INFORMATION. THIS DRAWING AND THE INFORMATION CONTAINED THEREIN MUST NOT BE DUPLICATED, USED, DIVULGED, REPRODUCED, COPIED, DISCLOSED OR APPROPRIATED IN WHOLE OR IN PART FOR ANY PURPOSE OTHER THAN AS EXPRESSLY AUTHORIZED BY SAFETY-KLEEN CORP. THIS DRAWING MUST BE RETURNED PROMPTLY UPON REQUEST.	SAFETY-KLEEN SYSTEMS, INC. 42 LONGWATER DRIVE, NORWELL, MA. 02061 PHONE: 781-792-5000					
		SCALE	BY	CHKD	APPR	OP. APPR	DATE
		STANDARD	NONE	JEK	JZ	JZ	8/29/24
		TALLAHASSEE FL.		7094-SP00-020		A	

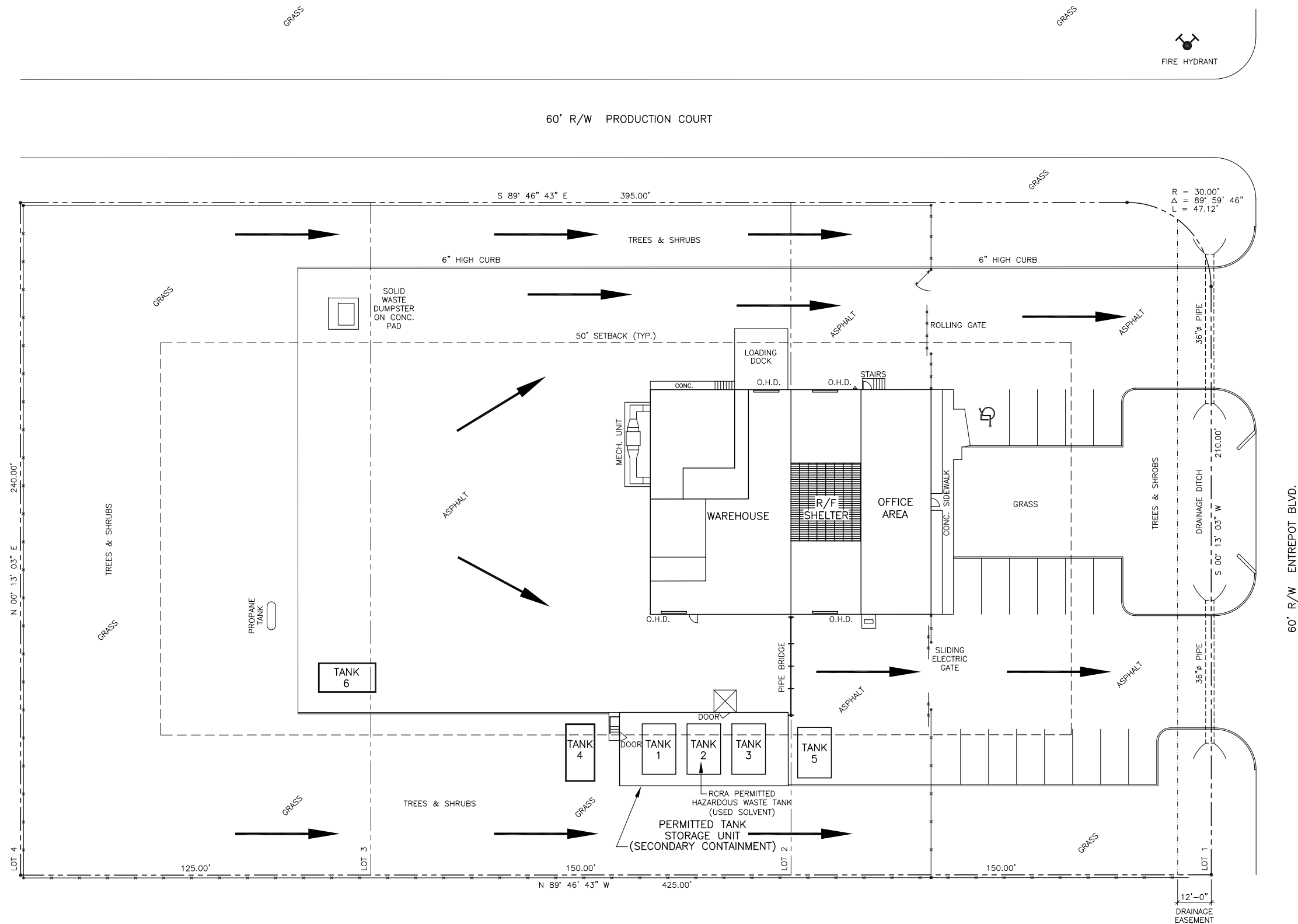


FIGURE 2.2-4

GENERAL NOTES

1. ALL TANKS ARE ABOVE GROUND STORAGE TANKS (AST'S).

LEGEND

FENCING

PROPERTY LINE

O.H.D.

OVERHEAD DOOR

GRATING

SURFACE WATER FLOW

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	15,000 USG	USED OIL	HORIZONTAL TANK
2	15,000 USG	USED SOLVENT SPIRITS	RCRA PERMITTED HAZARDOUS WASTE HORIZONTAL TANK
3	15,000 USG	USED OIL	HORIZONTAL TANK
4	12,000 USG	CLEAN 150 SOLVENT	HORIZONTAL TANK ON CONCRETE PIERS
5	8,000 USG	USED ANTI FREEZE	HORIZONTAL TANK
6	7,000 USG	NON HAZ. VAC. WASTE	HORIZONTAL TANK

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	NEW ISSUE FOR PERMIT	JEK	JC	JC	0116/23

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TITLE

LEGAL BOUNDARY AND
SURFACE WATER FLOW
4426 ENTREPOT BLVD.
TALLAHASSEE, FL. 32310

SAFETY-KLEEN SYSTEMS, INC.

42 LONGWATER DRIVE, NORWELL, MA. 02061
PHONE: 781-792-5000

SCALE 1"=20'-0"	BY JEK	CHKD JC	APPROVED JC	EHS	DATE 1/16/23
SERVICE CENTER LOCATION TALLAHASSEE, FL.			SC-DWG NUMBER 7094-SP00-001		REV. NO. A

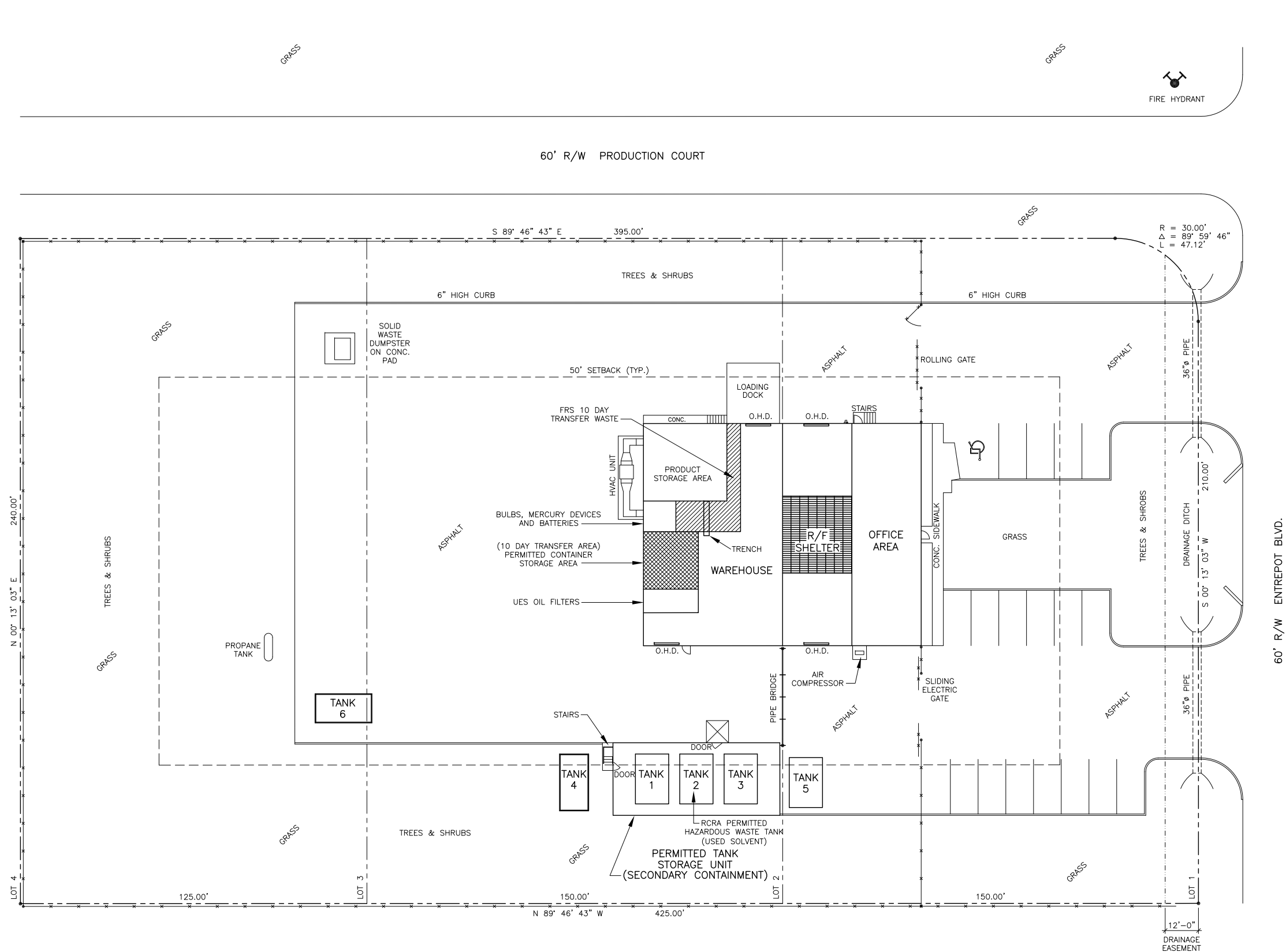
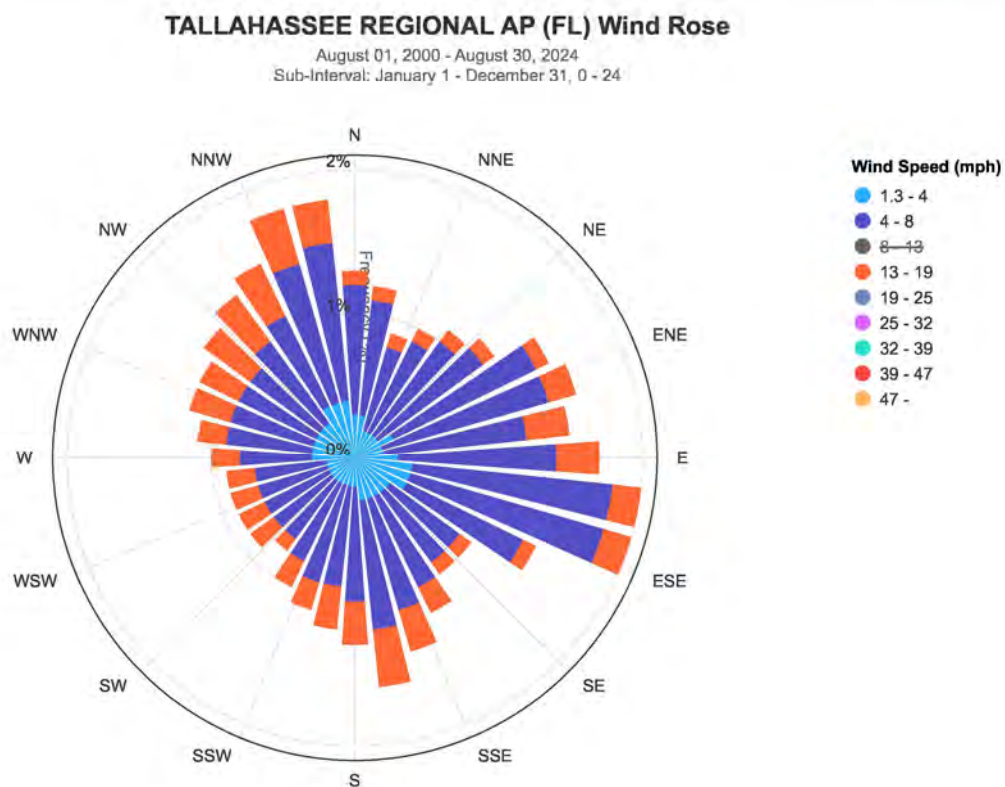


FIGURE 2.2-6

**TALLAHASSEE REGIONAL AP (FL)- Wind Frequency Table (percentage)**

Latitude : 30.3935	Start Date : August 01, 2000	Sub Interval Windows
Longitude : -84.3514	End Date : August 30, 2024	Start End
Elevation : 56 ft.		January December
Element : Mean Wind Speed	# of Days : 8796 of 8796	Date 1 31
	# obs : poss : 209325 of 211104	Hour 0 24

(Greater than or equal to initial interval value and Less than ending interval value.)

Range (mph)	0	10	20	30	40	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	200	210	220	230	240	250	260	270	280
1.3 - 4	0.3	0.3	0.2	0.2	0.2	0.2	0.3	0.2	0.2	0.3	0.4	0.4	0.4	0.3	0.3	0.3	0.3	0.3	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.3	0.3
4 - 8	0.9	0.8	0.6	0.7	0.8	0.9	1.1	1.2	1.0	1.1	1.4	1.4	0.9	0.6	0.6	0.7	0.8	0.9	0.8	0.7	0.7	0.6	0.5	0.5	0.5	0.5	0.5	0.5	0.6
8 - 13	0.7	0.5	0.4	0.5	0.5	0.7	0.9	1.1	1.1	1.0	0.9	0.9	0.5	0.4	0.4	0.6	0.9	0.9	0.9	0.7	0.6	0.5	0.4	0.4	0.4	0.4	0.4	0.4	0.5
13 - 19	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.3	0.3	0.2	0.2	0.1	0.1	0.1	0.2	0.3	0.4	0.3	0.3	0.2	0.2	0.1	0.2	0.2	0.2	0.2	0.2	0.2
19 - 25	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
25 - 32	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
32 - 39	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
39 - 47	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
47 -	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	2.0	1.7	1.4	1.5	1.6	1.9	2.4	2.7	2.6	2.7	2.9	2.9	2.0	1.4	1.4	1.8	2.3	2.5	2.3	1.9	1.7	1.5	1.3	1.2	1.2	1.4	1.4	1.5	1.6
Calm (<1.3)																													
Ave Speed	7.2	7.1	7.0	7.0	7.0	7.2	7.3	7.7	8.1	8.0	7.2	7.1	6.8	6.8	7.1	7.9	8.4	8.6	8.3	8.3	8.1	7.7	7.6	7.8	8.2	8.4	8.2	8.0	8.0

This tool uses standard hourly observations based on raw (non-quality controlled) decoded metar data from the ACIS-hourly database. Sub-hourly data (one-minute data, five-minute data, and special observations) are not included but are available from NCEI. Midwestern Regional Climate Center cli-MATE: MRCC Application Tools Environment Generated at: 8/30/2024 1:48:34 PM EDT



Florida Department
of Environmental Protection



Map Direct AIR (Area of Interest Report)
Standard Map

Point of Interest:
30°24'7.4646" x -84°19'30.8359"
30.40207351138618 x -84.32523219360837
Search Radius: 1 mile
Report Created on Fri Aug 16 2024 at 15:44:39
Map Direct v7.240801

Township/Range/Section: 1S1W15
Tallahassee, Leon County 32310
FDEP Regulatory District: NORTHWEST DISTRICT
Water Management District: NFWFMD
FL House District 8 :: FL Senate District 3
US Congressional District 2
HUC Basin Area: Apalachee Bay-St. Marks
Waterbody ID: 807D
State Land DM ID:



Search Result Summary

Features Found	Data Layer	Metadata	Spreadsheet
1	Source Water Assessment and Protection Program (SWAPP) Ground Water Areas (Non Federal)	Layer Information	Download as Spreadsheet
0	Ground Water Contamination Areas	Layer Information	--
1	Public Water Supply (PWS) Wells (Non-Federal)	Layer Information	Download as Spreadsheet
1	Private Wells from Generalized Well Information System (GWIS)	Layer Information	Download as Spreadsheet
0	Underground Injection Control (UIC) Class V ASR Wells	Layer Information	--

0	Underground Injection Control (UIC) Class I Wells	Layer Information	--
0	Underground Injection Control (UIC) Class V Non-ASR Wells	Layer Information	--
0	Underground Injection Control (UIC) Class V Non-ASR Wells	Layer Information	--

Search Result Details

Source Water Assessment and Protection Program (SWAPP) Ground Water Areas (Non Federal): 1 Found.

#1 of 1 from Source Water Assessment and Protection Program (SWAPP) Ground Water Areas (Non Federal)	
OBJECTID	414
PWS ID	1370791
WELL ID	863
AQUIFER	Floridan Aquifer
SHAPE.AREA	291736.588438
SHAPE.LEN	1914.906657

Public Water Supply (PWS) Wells (Non-Federal): 1 Found.

#1 of 1 from Public Water Supply (PWS) Wells (Non-Federal)	
GIS WELL ID	863
PWS ID	1370791
PWS STATUS	ACTIVE
WELL STATUS	ACTIVE
PWS NAME	LAKE BRADFORD ESTATES MHP
PWS ADDRESS	2775 CATHEDRAL DRIVE
PWS CITY	TALLAHASSEE
PWS ZIP5	32310
PWS PRIMARY PHONE	8505756115
PWS TYPE CODE	C
PWS TYPE	COMMUNITY
PWS SUBPART H	N
PWS OPERATOR	JIM PECK
PWS POP SERVED	167
WELL LAT DD	30
WELL LAT MM	24
WELL LAT SS	22.4764
WELL LONG DD	84
WELL LONG MM	19
WELL LONG SS	38.3086
WELL METHOD	DGPS
WELL DATUM	83
WELL COORDINATE DATE	07/12/2001

FLUWID	AAA5356
WELL PLANT ID	1
WELL ID	1
WELL NAME	WELL #1
WELL YEAR DRILLED	1968
WELL DEPTH DRILLED	
PWS LAST SAN SURVEY	06/19/2023
PWS DESIGN CAPACITY	180000
PWS PRIMARY SERVICE AREA	SUBDIVISION
WELL AVAILABILITY USAGE	PERMANENT
WELL HEIGHT ABOVE ELIPSOID	-4.755
PWS INSPECTOR INITS	LC
PWS CNP COUNTY ID	37
PWS OC1 OFFICE ID	NWD
LOCATIONS PWS LOCATION ID	72947
WELL UNDER DIRECT INFLUENCE	N
OBJECTID	863
AQUIFER	Floridan Aquifer

Private Wells from Generalized Well Information System (GWIS): 1 Found.

#1 of 1 from Private Wells from Generalized Well Information System (GWIS)	
PK STATION	5007
STATION NAME	302433084201901
LATITUDE DEGREES	30
LATITUDE MINUTES	24
LATITUDE SECONDS	33
LONGITUDE DEGREES	84
LONGITUDE MINUTES	20
LONGITUDE SECONDS	19
WELL TYPE	PRIVATE DRINKING WATER WELL
LAND SURFACE ELEVATION	36.55
WELL MEASURING PT ELEVATION	37.25
AGENCY MAINTAINING STATION INF	DEP AMBIENT WATER QUALITY MONITORING
LOCATION METHOD	MMAP
WELL DRILL DATE	
WELL TOTAL DEPTH	100
WELL CASING DEPTH	70
WELL CASING MATERIAL	BLACK IRON OR BLACK STEEL
WELL CASING DIAMETER	4
WATERBODY NAME	FLORIDAN AQUIFER SYSTEM
SUBAQUIFER	
SAMPLED HRSPWS WELL	N
STORET IDENTIFIER	302433084201901
WELL WATER LEVEL RECORDER	

OBJECTID	5007
----------	------

No Results Found:

Ground Water Contamination Areas

Underground Injection Control (UIC) Class I Wells

Underground Injection Control (UIC) Class V ASR Wells

Underground Injection Control (UIC) Class V Non-ASR Wells

Underground Injection Control (UIC) Class V Non-ASR Wells

*** END OF REPORT ***

Tab 2

Part II

Part II

A. General

1. Topographic Map

Figure 2.2-1, found at the end of Part I, is a USGS topographic map showing the facility location, per 40 CFR Part 270.14(b)(19). Due to the small size of the site, all of the information requested in FDEP's application form cannot be placed on one map. Therefore, additional maps are provided here to present the additional information requested in the application form. Specific information requested in the permit application is provided below.

Contours Sufficient to Show Surface Water Flow

Figure 2.2-4 shows surface water flow at the facility. The site is nearly flat. The unpaved area on the western side of the site is elevated above the paved area. There is a slope from the west to the east all the way to Entrepot Blvd. This slope directs surface water flow toward the drainage swale on the boundary with Entrepot Blvd. as depicted in Figure 2.2-4.

100-Year Floodplain Area

Based on information available (Figure 2.2-2), the facility does not lie within the 100- or 500-year flood plain. No special flood management procedures are necessary.

Access Control (fences, gates, etc.)

Figure 2.1-1, found at the end of Part I, shows access control features (e.g., fences, gates, doors, etc.).

On-site and off-site Injection and Withdrawal Wells

There are no injection or withdrawal wells on site. Results of an inventory of wells within one-quarter mile of the site are presented in Table 2.2-1.

Drinking Water Wells Listed In Public Records or Otherwise Known to the Applicant Within One-Quarter Mile of the Facility Property Boundary

Information from FDEP's GIS application Map Direct at <http://ca.dep.state.fl.us/mapdirect/?focus=none> is found on Table 2.2-1, is found at the end of Part I.

Surface Water Bodies Within One-Quarter Mile of the Facility Property Boundary (e.g., Intermittent Streams and Springs)

Lake Bradford is located 0.55 miles to the west-northwest of the facility, Munson Slough is located 1.0 mile to the southeast, and Black Swamp is located 0.30 miles to the northeast of the site.

Buildings and Other Structures

Figure 2.1-1, found at the end of Part I, shows on-site buildings and other structures.

Loading and Unloading Areas

Figure 2.1-2, found at the end of Part I, shows loading and unloading areas in relation to the waste management areas.

Hazardous Waste Units

Figure 2.2-5, found at the end of Part I, shows hazardous waste management units.

Figure Part II-Q, found at the end of Part II Q, shows the location of SWMUs.

Run-Off Control System

Figure 2.2-1, found at the end of Part I, shows surface elevations at the facility. Surface water run-off flows to the east where it enters the roadway drainage system for Entrepot Boulevard as shown on Figure 2.2-5, found at the end of Part I.

1.b Wind Rose

A wind rose for Tallahassee, Florida is shown in Figure 2.2-6 found at the end of Part I.

1.c Traffic Information

Site traffic patterns are illustrated in Figure 2.1-2, found at the end of Part I. The majority of the vehicular traffic and loading/unloading operation occurs at the loading dock (Area C) and near the Return/Fill Shelter (Area A), which are paved with asphalt and concrete. Area C and B area used for the loading/unloading of clean parts washer solvent and hazardous waste parts washer solvent from tanker trucks, and also loading/unloading of used oil from bulk used oil collection trucks. Approximately once per week a tractor trailer removes containerized waste for transfer to a Safety-Kleen or Clean Harbors TSDF. This truck backs up to the concrete dock, located on the northern side of the facility in Area C, to load waste containers and unload product for the Safety-Kleen branch.

Currently, the Safety-Kleen branch actively operates with four (4) route box trucks, one (1) vacuum services tanker truck and one (1) sales van.

Access to, and exit from, the facility is only provided by two gates that are both on the east side of the facility, as shown on Figure 2.1-2. There are no traffic control signals, designated traffic lanes, or stacking lanes within the site. The site road surface is mainly asphalt, with the exception of concrete areas as shown on Figure 2.1-2

Capital Circle SW is the major access road to the facility. This access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The facility route trucks that travel the routes between the branch and customers use the two-lane road within the industrial park.

Traffic from this facility is not expected to have a major effect on local traffic conditions. The facility and adjacent facilities have been in operation since at least 1990. The roads have been able to sustain the loads being transported over them since operations began.

Part II

A. General

2. FINANCIAL RESPONSIBILITY INFORMATION

A.2.a Per 40 CFR Part 264.142, the most recent closure cost estimates are provided in Part II.K.

Financial assurance is provided through the use of a financial test specified in Subpart H of 40 CFR Part 264.143.

A.2.d A copy of the document to demonstrate liability coverage, per 40 CFR Part 264.147, is provided at the end of this section.

STATE OF FLORIDA
HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE
(Primary Policy)

1. _____ Great American Insurance Company _____, (the "Insurer"),
of _____ 301 E 4th Street, Cincinnati, OH 45202 _____
Name of Insurer
Address of Insurer

hereby certifies that it has issued liability insurance covering bodily injury and property damage to
_____ Safety-Kleen Systems, Inc. _____, (the "Insured"), of
_____ 42 Longwater Drive, Norwell, MA 02061 _____
Name of Insured
Address of Insured

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147, as adopted by reference in Section 62-730.180, Florida Administrative Code (F.A.C.). The coverage applies at

EPA/DEP I.D. No.

Name

Address

See Attached List

for:

- ☒ sudden accidental occurrences
☐ nonsudden accidental occurrences
☐ sudden and nonsudden accidental occurrences

If coverage is for multiple facilities and the coverage is different for different facilities, indicate which facility(ies) are insured for sudden accidental occurrences, which are insured for nonsudden accidental occurrences, and which are insured for both.

The limits of liability are \$ 1,000,000.00 each occurrence and \$ 2,000,000.00 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number

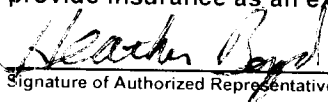
PRE E603235 03, issued on 11/1/2023. The effective date of said policy is 11/1/2023.
Date Date

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f), as adopted by reference in Section 62-730.180, F.A.C.
- (c) Whenever requested by the Secretary of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Secretary a signed duplicate original of the policy and all endorsements.

- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Secretary of the FDEP.
- (e) Any other termination of the insurance (e.g., expiration, non-renewal) will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP.

I hereby certify that the wording of this instrument is substantially identical to the wording specified in 40 CFR 264.151(j), as adopted by reference in Section 62-730.180, F.A.C., as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States including Florida.



Signature of Authorized Representative of Insurer

Heather Boyd

Type name

Divisional Vice President, Environmental

Title

Authorized Representative of

Great American Insurance Company

Name of Insurer

31 St James, Suite 830, Boston, MA 02116

Address of Representative

SAFETY-KLEEN SYSTEMS, INC.

STATE OF FLORIDA

505 Plumosa Drive
Altamonte Springs, FL 32701

FLD097837983

5610 Alpha Drive
Boynton Beach, FL 33426

FLD984167791

Georgia Street
Delray Beach, FL 33444

1855 S.W. 4th Avenue
B-11
Delray Beach, FL 33444

FLD000776757

8755 NW 95th Street
Medley, FL 33178

FLD984171694

161 Industrial Loop South
Orange Park, FL 32073

FLD980847214

79200 Peachland Blvd. Units 1-6
Port Charlotte, FL 33948-2166

FLD000776716

23375 Janice Avenue
Port Charlotte, FL 33948

FLD000776716

600 Central Park Drive
Sanford, FL 32771

FLD984171165

4426 Entreport Boulevard
Tallahassee, FL 32310

FLD982133159

5309 24th Avenue South
Tampa, FL 33619

FLD980847271

Manhattan Avenue
Tampa, FL 33614

FLD049557408

359 Cypress Road
Ocala, FL 34472

FLR000060301

2930 63rd Avenue
Bradenton, FL 34203

FLR000120618

8985 Columbia Road
Cape Canaveral, FL 32920

1400 NW 13th Avenue
Pompano Beach, FL 33069

A.3 Flood Map

This information is provided in Part I, Figure 2.2-2.

A.4 Facility Security Information

A.4a In accordance with 40 CFR Part 264.14, access to the facility is controlled through the following methods:

1. A chain link fence topped with barbed wire completely surrounds the active portion of the facility. Entry to the facility is provided by two (2) gates that are both on the eastern side of the site, and one (1) front door that leads into the office area. The gates are kept locked at all times unless there are authorized vehicles entering/leaving the facility.
2. Signs are posted at the entrance of the facility and along the fence line so that they are visible from any approach at 25 feet. Signs are marked “DANGER – UNAUTHORIZED PERSONNEL KEEP OUT”.
3. The combination of signage and controlled access entrances prevents unknowing entry and minimizes the potential for unauthorized entry of persons, or livestock, into the facility. See Figure 2.1-1 at the end of Part I for detail.

Part II

A. General

A.4.b-d Contingency Plan

See Part II Preparedness, Prevention, Contingency Plan and Emergency Procedures for Daily Business Operations section.

A. General

A.4.e Training – Introductory and Continuing

PERSONNEL TRAINING

This section of the permit application describes Safety-Kleen’s training program. All position descriptions referenced may not be present at this facility. Training plan outlines, job descriptions, training content, frequency and techniques are described as well as the implementation of the training program. The information presented in this section is a representative example of employee training at Safety-Kleen. Variations in individual training may occur.

The purpose of Safety-Kleen’s training program is to familiarize employees with environmental, health & safety, and transportation regulations, records, and emergency procedures so they will perform their activities in the safest and most efficient manner possible.

DESCRIPTION OF TRAINING PROGRAM

Each employee is trained to operate and maintain the branch service center safely, and to understand hazards unique to job assignments. Before starting work in their new positions at the Branch, each employee is required to complete initial regulatory training. Regulatory training for new employees may be given at the local branch where they will be assigned. This regulatory training is given via web-based classes (Web-based instructor led & online learning modules). Introductory training will include an overview of the history of Clean Harbors/Safety-Kleen, products and services provided by the company, policies and benefits, HAZWOPER 24-hr., and USDOT Regulations Regarding the Safe and Legal Transport of Materials Designated as Hazardous. Branch Managers, Customer Service Managers, and Account Managers will attend a Training class which provides an overview of RCRA regulations. Branch Managers, Customer Service Managers, Drivers (Sales and Service Representatives, Vacuum Sales and Service Representatives, Oil Sales and Service Representatives) will attend USDOT Federal Motor Carrier Safety Regulations Regarding Entry Level Driver Training. All new employees that may operate a company vehicle will attend a defensive driving training class. All employees who perform physical sampling activities will be trained on the collection and preservation of samples procedures described in EPA publication SW-846 “Test Methods for Evaluating Solid Waste” 3rd Edition, and Chapter 62-160, Florida Administrative Code (F.A.C.). Upon completion of these

introductory training classes, each employee will attend a RCRA Site Specific training class which covers RCRA regulations as they pertain to the Safety-Kleen Branch, overview of the hazardous waste operating permit, and contingency plan training review. New branch managers must complete a formal introductory training program before starting their job. This training involves working with an experienced Field Operations Manager at their respective branch, and possible travel to another Safety-Kleen branch to work with an experienced branch manager. New Sales and Service Representatives and all other hazardous waste employees must undergo a combination of classroom, online, and on-the-job training prior to working with hazardous waste. Material Handlers will undergo a combination of classroom, online, and on-the-job training prior to working with hazardous waste. Personnel involved in direct handling of hazardous waste do not work unsupervised until they have completed the entire initial hazardous waste training course. If an employee changes position, they will receive all training that pertains to that new position within 6 months before working unsupervised. All employees that handle and/or manage hazardous wastes will normally complete the introductory training program within the first month of employment. In addition, all employees will be trained to effectively respond to emergencies within 6 months after beginning employment, assignment to a facility, or to a new position, whichever is later, in accordance with 40 CFR Part 264.16(b).

Outline of Training Program

An outline of the training program given initially to employees who manage or handle Hazardous Waste at the Branch is presented in Table 6.1-1, found at the end of this section.

Job Title/Job Description

Job descriptions for employees who would be expected to manage or handle hazardous wastes are provided in Tables 6.1-2 through 6.1-11, found at the end of this section.

Training Content, Frequency, and Techniques

Employee training is accomplished using classroom, online, videotape, written, and on-the-job methods. All new employees whose responsibilities require 24-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training will receive this via web-based modules and will be required to review completion of these modules with their respective Health

& Safety Manager. This training program provides a consistent and quality hazardous waste operations training program.

The training that a new operations employee will receive is divided into two parts.

- The first two weeks of employment will be spent attending web-based regulatory and company specific orientation training at the local branch they will be assigned to. The new employee will receive a company orientation, including a review of company benefits, and hazardous waste operations training (HAZWOPER 24-hr.), USDOT Regulations Regarding the Safe and Legal Transport of Materials Designated as Hazardous, Branch Technical Training (if applicable to position), Entry Level Driver Training (if applicable to position), and Defensive Driver Training (if operating a company vehicle).
- The second part of new employee training is site specific training. When the new employee completes their initial regulatory training and orientation, qualified individuals delegated by Branch management will complete facility specific training. This will include such things as permit requirements, emergency contingency plan training, location of emergency equipment, forklift training, operating manual pallet jacks/hand trucks for container movement, return/fill operations (if applicable to job position), etc. Sales and Service Representatives will receive additional online, and on-the-job training for servicing all types of parts washers, containerized waste service, manifest preparation, etc. Vacuum Sales and Service Representatives will receive additional online, and on-the-job training for vacuum service operations including truck operation while unloading materials and off-loading at the branch. Oil Sales and Service Representatives will receive additional online, and on-the-job training for collection and screening of used oil, used antifreeze, truck operation while unloading materials and off-loading at the branch.

The job tasks a person performs will dictate the type of instruction required. The following presents the specific training requirements for new Safety-Kleen employees who will manage or handle hazardous waste.

Training of New Branch General Managers: New Branch Managers are trained for several weeks before they begin their new positions. This training is given on-the-job by Field Operations

Managers, and experienced branch managers. During this training, the new manager reviews environmental records and learns the recordkeeping requirements. These records include: manifests, personnel records, training records, service center inspection records, and spill reports. At least eight hours of this initial training consists of an introduction to environmental regulations, and a review of the Part B, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan.

Training of New Customer Service Manager: The Customer Service Manager is responsible for administrative operations at the Branch and managing the Sales and Service Representatives. Training is on location in the form of periodic training topics. This training includes an introduction to environmental regulations (including the Resource Conservation and Recovery Act), health and safety issues, emergency response and inventory (including waste) reconciliation methods. Additional time is spent reviewing past environmental compliance at the facility. Also, while being trained at the Branch where they will be stationed, a new Customer Service Manager will review environmental records and learn the recordkeeping and inspection requirements. These records include: manifests, personnel records, training records, service center inspection records, and spill reports.

Training of New Administrative Assistants (Secretaries): Secretaries are trained in the proper recordkeeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the Branch Manager and is done within six months of starting. This training is often presented in periodic training topics on emergency response, shipping documents (including manifests), drum labels, and other safety and environmental compliance issues.

Training of New Sales and Service Representatives (SSR), Account Managers (AM): These personnel are trained on-the-job by an experienced employee for two weeks, or more if needed. Sales and Service Representatives will ride along with experienced SSR's during which they are introduced to parts washer services, containerized waste services, proper container labeling, container inspections, container movement, manifests/bill of lading, load securement, and overall driving ability. Account Managers will work with experienced AM's visiting current, and potential customers to sell Safety-Kleen products and services, account set up, waste profiling,

etc. Additional training is in the form of periodic health & safety training topics, environmental regulations and a review of the Contingency Plan.

Training of New Material Handlers: Material Handlers (MH) are trained on-the-job to maintain the branch in compliance with hazardous waste operating permit conditions, environmental regulations, and assist the other Branch employees in their tasks. They will be the primary personnel for loading trucks with products for delivery to customers, off-loading containerized wastes from trucks arriving at the branch, and moving this material into the proper storage areas. MH's will also be the primary personnel for the Return/Fill operations, and normally will be a designee to perform Branch inspections and must be trained by the Branch Manager or Environmental Compliance Manager for this task.

Continuing and Annual Training: On a continuing basis, employees are trained using the programs prepared and updated Health & Safety, Environmental Compliance, Transportation Compliance, and Training Departments which contain the topics in Table 6.1-12, found at the end of this section. This training includes: Hazwoper 8 hr. annual refresher, RCRA annual refresher, updates on environmental regulations, review of the Contingency Plan and a review of RCRA inspection criteria. This review is in the form of classroom instruction, web-based instruction, and a review and discussion of the Branch hazardous waste operating permit conditions. Training on USDOT Regulations Regarding the Safe and Legal Transport of Materials Designated as Hazardous will be conducted virtually every 3 years for employees requiring this class. In addition, periodic sessions on changes in environmental regulations are issued by the Environmental Compliance and Health and Safety Departments and must be attended by all Branch personnel.

Training Director

The training is directed by Clean Harbors/Safety-Kleen's Training Department. There are specific Environmental Compliance Managers, Health & Safety Managers, and Transportation Compliance Managers responsible for compliance of the service centers in a given geographic area of the country. These compliance departments, in coordination with the facility, must:

- Provide a training program which addresses the requirements of all regulations and corporate policy.

- Notify the proper authorities, oversee remedial actions, and submit a written report to the state after an emergency situation has occurred;
- Assure that permits are submitted and updated as required;
- Manage any compliance issues which exceed the resources available at the service center level; and
- Participate in training new Branch employees and conducting annual refresher training.

Qualifications for individual staff members of the compliance departments who conduct training at the Branch are available upon request.

Relevance of Training to Job Position

Each employee is trained to operate and maintain the service center safely and to understand hazards unique to their job assignment. Safety-Kleen's training programs are designed to give employees appropriate instruction regarding the hazardous waste management procedures they will encounter in performing their respective duties. Since the handling of hazardous materials is a large part of the operations of the service center, all employees are given training in health & safety, transportation regulations, environmental regulations, and the Preparedness and Prevention, and the Contingency plans.

Training for Hazardous Waste Management

As described previously, all employees are trained in the aspects of hazardous waste management which are relevant to their position. This includes job-specific hazards, necessary precautions, emergency response, and proper recordkeeping. This training is given initially and updated annually.

Training for Contingency Plan Implementation

All employees are trained in Contingency Plan implementation, through initial training, and at yearly RCRA refresher courses. Employees are trained on the contents of the Contingency Plan as well as criteria for implementation.

Training for Hazardous Waste Operations and Emergency Response

All employees are trained in emergency response procedures through both initial Hazwoper 24-hr. training and Hazwoper 8-hr. annual refresher courses. The emergency training involves spill and fire prevention as well as remedial action procedures. Employees are also trained to recognize when evacuation and outside assistance may be necessary.

Training for Handling Mercury-Containing Lamps and Devices

As a registered transporter and storage facility for mercury-containing lamps and devices destined for recycling, the Branch has certified it has employee training procedure in place for the proper handling, emergency response, and containment/clean-up of its spent universal waste lamps, or devices. This training is given during the annual RCRA refresher.

Personnel Training Records

All personnel training is documented, and the documentation is kept on file at the Branch until closure for active employees, and three years for employees that have terminated their employment with Safety-Kleen. Documentation includes the training received, employee name, and the date of training.

TABLE 6.1-1

TYPICAL OUTLINE OF INITIAL TRAINING TOPICS

Day	Topic	SK Course Name
Monday	Welcome / Introductions/Ground Rules	Driver Training Essentials
	Driver Qualifications	
	Driver Wellness	
	Whistleblower Protection	
	Hours of Service Regulations	
	Exempt Log Training	
	Pre & Post Trip Inspections	
	Load Securement	
	Vehicle Cone Program	
Tuesday	Welcome / Introductions/Ground Rules	HAZWOPER
	Regulatory Compliance	
	Hazard Recognition	
	Hazard Communication	
	Respiratory Protection	
Wednesday	Walking & Working Surfaces	HAZWOPER
	Patriot Act for Employees	
	Personal Protective Equipment	
	Decontamination	
	Toxicology	
	Medical Surveillance	
	Hearing Protection	
Thursday	Ergonomics	HAZWOPER
	Fire Prevention & Protection	
	Lockout/Tagout Awareness	
	Electrical Safety	
	Confined Space Awareness	
	Container Handling	
Friday	Introduction	Hazardous Materials Transportation Skills (HMTS)
	Definitions	
	D.O.T. Regulations	
	Hazard Classes	
	Hazardous Materials Table	
	Shipping Papers	
	Marking	
	Labeling	
	Placarding	
	Hazardous Materials Segregation	
	Packaging	
	Incidents	

Day	Topic	SK Course Name
Friday (cont'd)	Load Securement	HMTS (cont'd)
Saturday	RCRA Regulations	Branch Technical Training
	Waste Material Profiling	
	Sampling Hazardous Materials	
	Shipping HazMat Samples via ground	

Safety-Kleen Systems, Inc.**Job Description**

Job Title: Branch General Manager
Department: Branch Sales & Service
Reports To: District Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 01/29/07

Summary: The Branch General Manager is responsible for financial and operational management including: financial performance against quota or budget (P & L), EH&S compliance through the Environmental Management System (EMS), and operational management of the facilities and of the human resources.

Essential Duties and Responsibilities include but are not limited to the following.

- Manage the branch operations including hiring, training, and supervision of the staff.
- Manage sales and service staff in achieving customer retention, on-time service performance, and accounts receivable goals by: observing corporate operating guidelines, training and reinforcing critical service skills, and working to prevent and resolve customer service issues.
- Conduct inspections and ride-alongs with sales and service staff to ensure timely and effective servicing of customers' equipment.
- Profit or loss of the facility(ies) by focusing on building new business relationships and maintaining existing customer bases and satisfaction.
- Prepare branch sales/service forecast and budget.
- Knowledge of, and compliance with hazardous waste regulations, and RCRA permit conditions. Monitoring/supervising daily operations to assure performance is within regulatory guidelines. Health & Safety leadership to ensure compliance with OSHA regulations.
- Maintenance of branch fleet to company standards, assistance with branch incident alert and spill response systems, and control of branch inventory.
- Maximize collection of money at the time of service, collect on overdue accounts, and determine when to pull an account.
- Ensure that all branch customer service practices are conducted consistent with high ethical standards.

Supervisory Responsibility:

The Branch General Manager recommends hiring, training, scheduling, performance appraisal, promoting, compensation, corrective action and termination.

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Education and/Or Experience: Minimum of High School diploma or (GED). Bachelor's degree preferred. At least 5 years experience in a sales and service organization.

Certificates, Licenses, Registrations: Class B CDL, Haz Mat, Air Brakes and Tankers endorsement.

Physical Demands: While performing the duties of this job, the employee must frequently sit for long periods of time, use the computer, as well as occasionally lift up to 25 pounds. There will also be some occasional need for bending, kneeling, or reaching.

Work Environment: While performing the duties of this job, the employee has some exposure to warehouse as well as outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; extreme cold; extreme heat.

Safety-Kleen Systems, Inc.

Job Description

Job Title: Customer Service Manager
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 01/29/07

Summary: The Customer Service Manager is responsible for ensuring optimum customer service leading to retention and expansion of the branch business. Key responsibilities include supervising customer service staff, ensuring services are completed in a timely manner, and managing customer relationships.

Essential Duties and Responsibilities include but are not limited to the following.

- Manage the branch customer service functions including hiring, training and supervision of the sales and service representatives (SSR).
- Manage sales and service staff in achieving customer retention, on-time service performance, and accounts receivable goals by: observing corporate operating guidelines, training and reinforcing critical service skills, and working to prevent and resolve customer service issues.
- Conduct inspections and ride-alongs with sales and service staff to ensure timely and effective servicing of customers' equipment.
- Direct branch service scheduling and logistics to ensure on-time performance for all customers by aligning territories, defining routes, and managing associated paperwork.
- Exhibit knowledge of hazardous waste regulations and RCRA permit conditions. Monitor daily operations with respect to drivers to assure performance is within regulatory guidelines.
- Work with Branch General Manager (BGM) to ensure effective operation of the branch including maintenance and operation of branch fleet to company standards, assistance with branch incident alert and spill response systems, and control of branch inventory.
- Administer branch accounts receivable program to maximize collection of money at the time of service, collect on overdue accounts, and determine when to pull an account.
- Ensure that all branch customer service practices are conducted consistent with high ethical standards.

Supervisory Responsibility:

The Customer Service Manager recommends hiring, training, scheduling, performance appraisal, promoting, compensation, and termination.

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/Or Experience: High school diploma or (GED). 3-5 years experience and/or related training.

Certificates, Licenses, Registrations: Class B CDL, Haz Mat, Air Brakes and Tankers endorsement.

Physical Demands: While performing the duties of this job, the employee must frequently stand, walk, bend, use the computer, reach, squat, stoop and twist. The employee must frequently carry, lift, pull or push up to 50 pounds. The employee will occasionally drive a large truck.

Work Environment: While performing the duties of this job, the employee is frequently exposed to warehouse and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; extreme cold; extreme heat.

Safety-Kleen Systems, Inc.

Job Description

Job Title: Account Manager
Department: Sales
Reports To: District Sales Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 01/29/07

Summary: The MSS will continually manage an account base outside of the ordinary service schedule. This position will also grow business internally and externally. The MSS will act as the primary point of contact for customers with questions / concerns / new business. This should be a motivated person who possesses consultative selling abilities and who is skilled at building long-term business relationships within the assigned sales territory.

Essential Duties and Responsibilities include but are not limited to the following.

- Completion of necessary paperwork (waste profiling, quotations etc).
- Communication with service, office, and warehouse staff.
- Build relationships with key buyers in territory.
- Assess current/potential business in existing accounts and create strategy to grow business.
- Analyze customer needs and design sales, customer service and account management processes to acquire and retain accounts.
- Prepare and deliver customer quotes and identify new solutions for customers
- Provide technical and sales assistance to customers.
- Serve as interface between customers and company by ensuring that customer needs are met and by handling customer complaints.
- Prepare sales plans and future period forecasts.
- Monitor and track sales plan to ensure sales quota is met; prepare regular status reports.
- Keep abreast of products, market conditions and competitive activities.

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/or Experience: Two years of college or specialized training (business or environmental) is required plus 1-3 years experience. Bachelor's degree plus coursework and certification is preferred. Alternative combinations of education and experience may be accepted in lieu of degree.

Competencies and Skills: Analytical, prioritization, organization, computer and leadership skills. Must be proficient working with spreadsheets as well as CRM software tools.

Physical Demands: While performing the duties of this job, the employee must frequently drive a car.

Safety-Kleen Systems, Inc.**Job Description**

Job Title: Branch Administrator
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 03/26/07

Summary: The Branch Administrator is an administrative position responsible for maintaining detailed and accurate company, branch, and customer files.

Essential Duties and Responsibilities include but are not limited to the following.

- Assembles packages of documents for Sales Representatives.
- Check Sales or Hazardous Waste documents turned in by Sales Representatives.
- Ensure proper completion of paperwork including manifests, and alert manager of errors.
- Provide customer service functions by responding to customer inquiries and/or complaints, handling or routing service questions, and solving problem accounts.
- Prepare Manual Forms, Manifests and LDR forms, as required.
- Distribute copies of service documents and manifests to customers, various Safety-Kleen locations, and to governmental agencies, as required.
- Contact customers delinquent in payment and coordinates pick-up of payments.
- Log wastes, adjusts service scheduling, prepares reports, completes MMVR reports and checks manifests for assigned territories.
- Provide other clerical support duties as requested.
- Exhibit knowledge of hazardous waste regulations with regard to daily branch responsibilities

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/Or Experience: High school diploma and six months+ related experience, and/or training.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of Safety, Time Management, Product Knowledge, Sense of Direction, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently sit at a work station using the computer.

Safety-Kleen Systems, Inc.

Job Description

Job Title: Material Handler
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 03/26/07

Summary: The Material Handler works in the warehouse handling hazardous waste material using a forklift or other equipment.

Essential Duties and Responsibilities include but are not limited to the following.

- Loads finished product bulk shipments, and completes paperwork.
- Samples inbound bulk shipments and completes paperwork.
- Inventory and maintain loading and unloading areas.
- Prepares bulk wastes for shipment to other Safety-Kleen locations.
- Empties bulk into holding vessel.
- Washes "used parts washer" drums in drum washer and fills clean drums with solvent.
- Shrink wraps containerized wastes, arranging the waste on the pallet so all labels are showing, and prepares the shipment for transportation to other Safety-Kleen locations.
- Checks all trucks for proper strapping of drums and that cargo doors are closed.
- Disassembles returned parts washing machines and prepares them for shipment to the DC.
- Completes daily/weekly facility inspection required by Part B Permit or by Safety-Kleen, as assigned by the Branch Manager.
- Monitors waste quantity and storage limits and notifies the Branch Manager if limits will be exceeded within 24-48 hours so action can be taken.
- Oversees retained sample program.
- Ensure dock, warehouse and return & fill areas are cleaned and organized at all times.
- Exhibit knowledge of hazardous waste regulations with regard to warehouse operations and permit conditions.
- Emergency response actions

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/Or Experience: High school diploma and six months+ related experience, and/or training. Familiar with H.S.E. and M.S.D.S. for all product used and stored at the facility. Certified forklift operator. Certified in hazardous waste operations and emergency response.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of Safety, Time Management, Product Knowledge, Sense of Direction, and Organization skills.

Physical Demands: Exert up to 50 pounds of force occasionally, and/or up to 20 pounds of force frequently, and/or up to 10 pounds of force constantly to move objects. Stands and/or walks more than 4 hours a day. Hand Tools & Small Power Tools; Hand Truck/Dolly; Large Power Tools & Equipment, Forklift, Truck, Wench; Personal Protective Equipment.

Safety-Kleen Systems, Inc.

Job Description

Job Title: Sales & Service Associate
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 01/29/07

Summary: The SSA is an entry level position responsible for learning how to service our parts cleaning machines and selling related products to customers on route.

Essential Duties and Responsibilities include but are not limited to the following.

- Receive manifests, labels, route schedule from office staff.
- Select, pull, and load needed inventory (empty drums, pig products, new machines, etc) for the day's customer visits as per route schedule.
- Perform daily truck check & complete truck check list form.
- Perform routine route.
- Properly label, scan, and document waste picked up from customer site.
- Present receipt to customer, as well as address any customer service issues or sales opportunities.
- Complete end of day paperwork.
- Perform equipment repair activities as needed.

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/Or Experience: High school diploma or (GED) and six months+ related experience, and/or training.

Certificates, Licenses, Registrations: Class C CDL and Haz Mat endorsement (or the ability to obtain)

Competencies and Skills: Mechanically Inclined, Customer Service, Attention to Detail, Recognize the importance of Safety, Time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Waste, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently stand or walk and occasionally drive a large truck. The employee must frequently carry, lift, pull or push up to 50 pounds. The employee is occasionally required to reach, bend, kneel, squat, climb, stoop or twist; and talk or hear.

Work Environment: While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and risk of electrical shock.

Safety-Kleen Systems, Inc.

Job Description

Job Title: Sales and Service Representative
Department: Branch Services
Reports To: Branch Service Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 01/29/07

Summary: Services SK machines at customer sites, sells new products to existing customers, removes waste from customer sites and provides on-site customer service.

Essential Duties and Responsibilities include but are not limited to the following.

- Receive manifests, labels, route schedule from office staff.
- Select, pull, and load needed inventory (empty drums, pig products, new machines, etc) per route schedule.
- Perform daily truck check & complete truck check list form.
- Perform routine route
- Properly label, scan, and document waste picked up from customer site.
- Present receipt to customer as well as address any customer service issues or sales opportunities.
- Complete end of day paperwork.

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/Or Experience: High school diploma or (GED) and six months+ related experience, and/or training.

Certificates, Licenses, Registrations: Class C CDL and hazmat certifications.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of Safety, Time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Waste, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently sit, walk, stand, crawl or drive a truck. The employee must frequently carry, lift, pull or push 50 pounds or more. The employee is constantly required to reach, bend, kneel, squat, climb, stoop or twist; and talk or hear. The employee must constantly drive a large truck and/or move heavy equipment.

Work Environment: While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and risk of electrical shock.

Safety-Kleen Systems, Inc.**Job Description**

Job Title: Oil Sales and Service Representative
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt/Non-Exempt
Approved By: SVP HR
Approved Date: 01/29/07

Summary: The OSSR is responsible for safely and efficiently removing, transporting and delivering waste oil from customer facilities to Safety-Kleen oil recycling and refining centers.

Essential Duties and Responsibilities include but are not limited to the following.

- Receive manifests, labels & route schedule from office staff
- Perform Pre & Post Trip Inspection Report
- Perform routine route.
- Properly label, scan and document waste oil removed from customer site into handheld. Present receipt to customer, obtain authorized signature, as well as address any customer service issues and sales opportunities.
- Complete end of day paperwork (any manifests, orders etc. that were not already in the handheld). Dock handheld for overnight upload.
- Ensure environmental compliance and operate vehicles in accordance with DOT, local, state and federal requirements

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/or Experience: High school diploma or (GED) and six months+ related experience, and/or training.

Certificates, Licenses, Registrations: Class C CDL and Haz Mat endorsement and Tanker.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of, and adherence to, Safety regulations and policies, Time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Waste, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently sit, walk, stand, crawl or drive a truck with reasonable accommodations. The employee must frequently carry, lift, pull or push 50 pounds or more. The employee is constantly required to reach, bend, kneel, squat, climb, stoop or twist; and talk or hear. The employee must constantly drive a large truck.

Work Environment: While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and risk of electrical shock.

Safety-Kleen Systems, Inc.**Job Description**

Job Title: OIL/VAC Sales and Service Rep.
Department: Branch Sales & Service
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 10/2/06

Summary: This position combines the Oil & Vac routes and depending on the service will require the employee to remove waste fluid our customers (VSSR Route). This involves using vacuum equipment to pump waste materials and liquid from oil-water separator pits, as well as transporting & delivering the waste material to Safety-Kleen disposal sites. Or, it will require the employee to remove, transport and deliver waste oil from customer facilities to Safety-Kleen oil recycling and refining centers (Oil Route). Reports to CSM or BGM.

Essential Duties and Responsibilities include the following. Other duties may be assigned.

- Receive manifests, labels & route schedule from office staff
- Perform Pre & Post Trip Inspection Report
- Perform route: (drive to customer location, ensure each service meets the used oil or vac waste qualifications, take sample of each oil or vac service & place in retain sample storage area, pump waste oil or waste materials & liquid from oil-water separator pits from customer facilities to Safety-Kleen oil recycling & refining centers or Safety-Kleen disposal site).
- Properly label, scan and document waste oil (oil service) or waste materials & liquids (vac service) removed from customer site into handheld. Present receipt to customer, obtain authorized signature, as well as answer any customer service issues.
- Complete end of day paperwork (any manifests, orders etc. that were not already in the handheld). Dock handheld for overnight upload.
- Ensure environmental compliance and operate vehicles in accordance with DOT, local, state and federal requirements.

Sales Responsibilities:

Focus is all customer types within a particular region or territory for new and existing accounts.

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Education and/or Experience: High school diploma or (GED). No experience necessary.

Certificates, Licenses, Registrations: CDL and Haz Mat endorsement and Tanker.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of, and adherence to, Safety regulations and policies, Time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Waste, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently kneel and stoop and constantly bend, climb, reach and twist. The employee must constantly carry, lift and pull up to 50 pounds. The employee must constantly drive a large truck and occasionally move equipment. Job will use right and left hands for repetitive movement such as Simple Grasping and Pushing/Pulling. Job will use right hand for repetitive movement such as Fine Manipulation. Job will use feet for repetitive movement such as foot controls.

Work Environment: While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and risk of electrical shock.

Safety-Kleen Systems, Inc.

Job Description

Job Title: Vacuum Sales and Service Representative
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt/Non-Exempt
Approved By: SVP HR
Approved Date: 01/29/07

Summary: The VSSR provides waste fluid removal services to our customers. This involves using vacuum equipment to pump waste materials and liquid from oil-water separator pits, as well as transporting & delivering the waste material to Safety-Kleen disposal sites.

Essential Duties and Responsibilities include but are not limited to the following.

- Receive manifests, labels & route schedule from office staff
- Perform Pre & Post Trip Inspection Report
- Perform routine route and associated daily activities.
- Properly label, scan and document waste materials & liquids removed from customer site.
- Present receipt to customer, obtain authorized signature, as well as answer any customer service issues.
- Complete end of day paperwork.
- Ensure environmental compliance and operate vehicles in accordance with DOT, local, state and federal requirements.
- Ensure strict compliance to Branch SOP's.
- Exhibit knowledge of used oil regulations with respect to responsibilities

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/Or Experience: High school diploma or (GED) and six months+ related experience, and/or training.

Certificates, Licenses, Registrations: Class C CDL and Haz Mat endorsement and Tanker.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of, and adherence to, Safety regulations and policies, Time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Waste, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently sit, walk, stand, crawl or drive a truck with reasonable accommodations. The employee must frequently carry, lift, pull or push 50 pounds or more. The employee is constantly required to reach, bend, kneel, squat, climb, stoop or twist; and talk or hear. The employee must constantly drive a large truck.

Work Environment: While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and risk of electrical shock.

TABLE 6.1-12
CONTINUING TRAINING TOPICS FOR BRANCH EMPLOYEES

- Hazard Communication Safety Training
- Hazard Communication regarding SDSs
- Preventing Injury and Illness
- Hazardous Materials Regulations
- Waste Analysis Plan
- Preparedness, Prevention, and Contingency Plan
- Respirator Fit Testing, and Training
- Generator Requirements
- Hazardous Waste Paperwork – Manifests, BOL, Labeling, etc.
- Initial RCRA training & annual RCRA refresher training – hazardous waste permit conditions, container and storage tank regulations, used oil training, universal waste training, manifest requirements, recordkeeping, and hazardous waste determination are included in the initial and annual RCRA training.

Part II, A. General**5. WASTE CHARACTERISTICS**

Waste analysis requirements mandate that before an owner or operator transfers, treats, stores, or disposes of any hazardous waste, he must obtain a detailed chemical and physical analysis of a representative sample of wastes. This analysis, at a minimum, must contain all of the information that must be known to treat, store, or dispose of the waste. The analysis may include data developed under 40 CFR 261 of the regulations and existing published or documented data on the hazardous waste or on hazardous waste generated from similar processes. The Waste Analysis Plan for the Safety-Kleen Tallahassee Branch, found in Part II.WAP, has been developed to meet the requirements described above and as found in 40 CFR 270.14(b) and 264.13.

Permitted/Site Generated Waste Streams

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent	S01*	384	D001 and D-Codes Listed in Note Below
Spent Parts Washer Solvent	S02**	384	D001 and D-Codes Listed in Note Below
Branch Generated Liquids/Solids (Debris)	S01*	4	D001 and D-Codes Listed in Note Below; F002, F003, F005
Dumpster Sediment	S01*	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01*	Included Above	D001 and D-Codes Listed in Note Below
Used Immersion Cleaner (#699)	S01*	6	D-Codes Listed in Note Below
Dry Cleaning Waste (Perchloroethylene)	S01*	5	F002 and D-Codes Listed in Note Below
Dry Cleaning Waste (Naphtha-Based)	S01*	Included above	D001 and D-Codes Listed in Note Below
Paint Wastes	S01*	18	D001, F003, F005 and D-Codes Listed in Note Below
Retain Samples From Used Oil Operations	S01*	2	D008, D018, D039, D040
Spent Aerosol Cans	S01*	< 1	D001, D035
Fluid Recovery Service (FRS) Transfer Wastes	S01 ***	100	Transfer wastes – waste codes assigned by generator ****
Aqueous Brake Cleaner	S01 ***	8	Transfer wastes – none, unless assigned by generator
Mercury-Containing Lamps/devices	N/A ***	Less than 2.2	N/A – handled as non-hazardous transfer wastes

NOTES:

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

* This waste will be stored in containers in the warehouse container storage area. The maximum capacity in the warehouse container storage area is 6,912 gallons.

** The RCRA-Permitted Hazardous Waste Tank (Used Solvent) has a capacity of 15,000 gallons and may be filled up to 14,250 gallons.

*** This waste will be held for transfer in containers in the transfer area(s). There is one transfer waste area Located inside the warehouse adjacent to the container storage area

**** Various D-Codes, F-Codes, K-Codes, P-Codes, U-Codes may be accepted for 10-day storage and transfer

CHEMICAL AND PHYSICAL ANALYSIS

270.14(b)(2)

264.13(a)

Used materials generated by Safety-Kleen customers are the primary feedstock for the generation of Safety-Kleen recycled solvent products. As a result, quality control of the used materials is necessary to monitor product quality and regulatory consistency. The Tallahassee facility collects used materials from numerous customers, many of whom are Very Small and Small Quantity Generators (VSQGs and SQGs).

Most of the materials collected at the Service Center are managed in a closed-loop system and are collected from companies with a single process (i.e., washing oily parts, dry-cleaning, or painting). The composition and quality of these materials are known, and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications.

Analysis of Safety-Kleen's core/permitted waste streams is undertaken each year through the Annual Recharacterization Program (AR). The AR program involves representative samples being taken from customer core waste streams, randomly selected after being returned to the branches, at approximately 30-35 Safety-Kleen branches across the country. Representative samples of common waste streams generated at Safety-Kleen branches are also taken and submitted for analysis as part of the AR program. Samples are sent to an independent laboratory for analysis (TCLP metals, volatiles, semi-volatiles, flash point, and pH). The results of the analyses are then tabulated for all participating Safety-Kleen Branches to provide a cross-sectional view of the waste characteristics associated with the closed-loop or industry-specific waste streams. Then the results are subjected to a statistical review to determine applicable EPA hazardous waste codes for the upcoming year. A summary and explanation of the statistical analysis and methodology utilized to evaluate the analytical data obtained through the AR program each year is included in Part II WAP section. A summary of the analyses for the AR program is found in Appendix B.

***Descriptions of Permitted Waste Streams
Wastes Resulting from Solvent-Based Parts Washer Service***

Used parts washer solvent from parts washer services at Safety-Kleen customers is accumulated in a 15,000-gallon aboveground storage tank (RCRA-Permitted Hazardous Waste Tank (Used Solvent) via the wet dumpster in the Return and Fill Shelter (R/F). Containers of used solvent are poured into a drum washer unit (wet dumpster) at the R/F which in turn empties into the tank. The appropriate waste codes will be based on Safety-Kleen's Annual Recharacterization (AR) study. This waste handling method results in three types of parts washer solvent-based waste:

1. Used Parts Washer Solvent which may include any of Safety-Kleen's petroleum-naphtha based products, is removed from the RCRA-Permitted Hazardous Waste Tank (Used Solvent) by a tanker approximately every 20 working days. For appropriate waste codes, see the Table above in this section. The Tallahassee facility will ship used parts washer solvent to a permitted Safety-Kleen/Clean Harbors TSDF or other facility appropriately permitted to accept the waste for reclamation. The used parts washer solvent removed from the bulk tank is a homogeneous material as no other waste streams are placed in the bulk tank.
2. Solvent Tank Bottoms includes sediment and other heavy material that has accumulated at bottom of the RCRA-Permitted Hazardous Waste Tank (Used Solvent). Periodically it is necessary to remove this material when the accumulation impacts or may impact the ability to pump liquid solvent from the bottom outlet of the tank. The frequency of removal of the tank bottoms varies, dependent on the amount of suspended solids in the used solvent that settle during tank storage. Bottoms are typically removed by suction/vacuum truck and transported for offsite disposal. Typically, removal may be required every three-five years. For appropriate waste codes, see the Table above in this section.
3. Branch Generated Liquids/Solids/Dumpster Sediment – In the course of day-to day operations, the Branch generates waste associated with sampling customers' waste and branch activities. Such wastes may include wipes, gloves, etc. In addition, liquid wastes may be generated as a result of decontaminating sampling equipment. The dumpster sediment chemical composition is analogous to that of the solvent tank bottoms. These containers are stored in the container storage area. The facility ultimately ships these materials to a permitted Safety-Kleen/Clean Harbors TSDF or other permitted facility for disposal. This waste stream is not sampled/analyzed, a "worst case scenario" is assumed. For appropriate waste codes, see the Table above in this section.

4. System One Type Parts Washers (recycling units) – These types of parts washers build up oil/sludge in the distillation unit of the machine while in use at the customer's location. This material is not sampled/analyzed as part of SK's annual re-characterization program and is managed according to the customer/generator waste determination. If a generator is a VSQG, SK recommends that they place this material in their used oil, if they are a generator of used oil.

Immersion Cleaner (IC) is another type of parts washer solvent. This product is a heavy aromatic naphtha, N-methyl-2-pyrrolidinone, dipropylene glycol methyl ether, monoethanolamine and oleic acid, and may contain a maximum of 1 percent chlorinated compounds. Containers of used IC are stored in the container storage area or transfer area. The Immersion Cleaner remains in the container in which it was originally delivered to the customer in until it is received at a permitted SK/Clean Harbors TSDF for reclamation/disposal. For appropriate waste codes, see the Table above in this section.

Wastes Resulting From the Dry Cleaner Service

Safety-Kleen manages naphtha-based, and perchloroethylene-type of hazardous dry cleaner waste in the container storage area or transfer waste area. This waste can have three forms: bottoms, filters, and separator waters. These wastes are packaged on the customers' premises in containers meeting U.S. DOT specifications. When received at the facility, the perchloroethylene, and naphtha-based non-perchloroethylene dry cleaning containers are placed in the container storage area or transfer waste area. Dry cleaning wastes remain in the containers received from the customer until received at the designated, permitted Safety-Kleen/Clean Harbors TSDF, or other appropriately permitted facility.

The dry-cleaning process may produce three waste streams:

1. Filter Cartridges are generated as waste when they can no longer effectively filter the solvent in the chamber. In addition to the filter materials of construction consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease, lint, hair, and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight. Dry cleaner filters are given the same waste codes as the associated dry cleaner bottoms because both streams are derived from the same source. Designating the same codes for the filters as were used for the bottoms is a conservative

approach. A representative filter sample is difficult to obtain because of the make-up of the filter (metal core) and obtaining the sample would involve dismantling of the filter and undue exposure to the dismantler.

2/3. Still Bottom Residue and Separator Water are generated after filtration and distillation at the generator to remove the dissolved materials from the used solvent. The dissolved materials (still bottom residues) are in liquid form and consist primarily of solvent, oil, grease, hair, dirt, and water. In some cases, the dry cleaner will separate the water condensate from the still residue. Water condensate, generated during the distillation process, may contain dry cleaning solvent, oil, grease, and dirt as well. The dry-cleaning separator water will be given the same waste codes as the associated bottoms with the omission of D007 because chromium is not expected to carry over into the separator water during the distillation process (i.e., the boiling point of chromium is much greater than the operating temperature of the distillation unit). For appropriate waste codes see the Table above in this section.

Wastes Resulting From Paint and Thinner Services

Paint wastes consist Safety-Kleen lacquer thinner and paint residues resulting from cleaning of the paint guns by the generator. There are primarily three waste streams from this service: Paint Gun Cleaner, Clear Choice® Paint Gun Cleaner, and paint waste-other. Safety-Kleen thinners are used during the generation of the first two waste streams.

1. Paint Gun Cleaner is a paint gun cleaning lacquer thinner containing a blend of solvents such as acetone, alcohols, ketones, toluene, xylene, and acetate compounds. These have primary waste codes of D001, F003 and F005. These are contaminated with lower levels of waste paint, as the gun cleaning machine is removing it from the paint sprayer during the cleaning operation. Safety-Kleen's core paint waste is typically recycled and fuel blended. Reference the table above in this section for other applicable waste codes.
2. Clear Choice Paint Gun Cleaner is acetone, so the F005 waste code does not apply to this waste stream. Other applicable waste codes are D001 and F003. The two Paint Gun Cleaner streams share the same AR data because the waste streams are similar due to the identical process generating the wastes. Reference the table above in this section for other applicable waste codes.

3. Paint Waste Other consists of the same material as the Paint Gun Cleaner, but has a higher level of paint solids, as this comes from the dumping of left-over paint from paint cups and guns when all the paint in a paint gun is not used. During the process creating this waste, typically smaller volumes of thinner are in the waste so these drums are fuel blended or incinerated rather than recycled for their solvent value. The primary waste codes are D001, F003 and F005. Reference the table above in this section for other applicable waste codes.

The paint wastes described above are collected in containers from the customer's location meeting U.S. DOT specifications. The wastes are containerized by the generator at their place of business. The paint wastes remain in these containers and are stored in the container storage area while at the SK Tallahassee branch. Paint wastes are then shipped to a permitted Safety-Kleen/Clean Harbors TSDF, or other properly permitted facility for disposal.

Branch Generated Retain Samples From Used Oil Operations

Used Oil/Oily Water Retain Samples are taken and maintained for every used oil/oily water service SK performs. This is to ensure that we can identify any customers who introduce contaminants (PCBs) into our used oil/oily water loads. At the time the retain sample is taken at the customer location, the driver is able to check the material for appearance (used oil mixed with fuels may cause the material to have a thinner/lighter appearance), unusual odors, and viscosity (used oil mixed with fuels would have a noticeably lower viscosity and flow more easily into the sample jar). These retain samples are kept at the branch in metal cabinets in the warehouse, and then disposed of as hazardous waste. The samples are typically 4-oz. plastic/glass jars. They are manually placed into 55-gallon containers, and properly labeled for disposal. These containers are stored in the container storage area until being sent to a permitted Safety-Kleen/Clean Harbors TSDF, or other properly permitted facility for disposal. Waste codes for this material are found in the table above in this section.

Branch Generated Aerosol Cans

Spent Aerosol Cans: From time to time the facility generates spent aerosol cans during operations. These cans are accumulated in a satellite accumulation container (30 or 55 gallon) at the facility. Once this container is full it is moved to the container storage area until being sent to

a permitted Safety-Kleen/Clean Harbors TSDF, or other properly permitted facility for disposal. Waste codes (D001/D035) for this material are found in the table above in this section.

Used Antifreeze

The spent antifreeze (ethylene glycol) is collected from automobile service stations. All antifreeze is collected by Safety-Kleen with the intent of it being recycled. At the customer's location, Safety-Kleen pumps waste ethylene glycol (antifreeze) into a dedicated compartment of a Safety-Kleen used oil tanker truck. This truck transports the used antifreeze (glycol) to the Tallahassee branch, for off-loading into dedicated vessels or containers. The glycol is then sent to a recycler for processing into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's *the Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. The Florida Department of Environmental Protection (FDEP) has determined this waste stream can be handled as non-hazardous as long as it is destined for recycling. If used antifreeze collected by the Safety-Kleen Tallahassee facility is sent to a facility other than the East Chicago re-refinery it will be managed as follows. If the glycol percentage is not acceptable at a glycol recycling facility, then a representative sample will be taken and sent for TCLP analysis to determine if it is a hazardous waste. It will be managed properly according to the TCLP analysis result. In addition, Safety-Kleen sells its' own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is then shipped to SK distribution centers, and then shipped to a recycler.

Aqueous Brake Cleaner

The Aqueous Brake Cleaner (ABC) is an aqueous, alkaline concentrated cleaner diluted with water (4¾ gallons of water is mixed with ¼-gallon of concentrated aqueous cleaner). The ABC parts cleaner has a 5-gallon reservoir under the cleaning vat that provides the aqueous solution for cleaning. The spent ABC is transported from the customers in 5-gallon suitcase type containers. Spent aqueous brake cleaner that is non-hazardous is sent to a waste-water treatment facility for processing. If a customer (generator) assigns any hazardous waste code to the spent ABC, the material is managed as a 10-day transfer waste and sent to an appropriate Safety-Kleen/Clean Harbors TSDF for processing.

Fluid Recovery Services (FRS) 10-Day Transfer Wastes

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Branch to collect and transfer various other hazardous wastes to the appropriate Safety-Kleen/Clean Harbors TSDF's for processing. Non-hazardous Containerized Waste Services (CWS) are also performed under this program. FRS wastes that are RCRA hazardous wastes are managed as 10-day transfer wastes. Examples of types of wastes that may be received under this program include:

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum-naphtha, etc.;
- Lubricating oils, hydraulic oils, synthetic oils, and machine oils, used antifreeze;
- Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, trichloroethylene, carbon tetrachloride, etc;
- Non-halogenated solvents such as cresols, nitrobenzene;
- Photographic and x-ray related wastes;
- Paint and lacquer thinners, acids/bases;
- Various returned/damaged/expired products from national retail chains. These are typical household products that may carry U-Codes due to being unused commercial chemical products;
- Other hazardous and non-hazardous halogenated and non-halogenated wastes.

Mercury Containing Lamps and Devices & Batteries

Mercury-containing lamps and devices are another type of waste handled by the Branch. All mercury-containing lamps/devices are managed in accordance with the Standards for Universal Waste Management found in 40 CFR Part 273. As part of its protocol for handling mercury-containing lamps and devices, the Branch provides customers with four-foot and eight-foot boxes which hold up to 39 lamps. The boxes are picked up at customer locations and are stored at the Branch west of the transfer waste storage areas. These containers are labeled in accordance with 62-737.400 (5)(b), Florida Administrative Code (FAC). The boxes are periodically shipped to a permitted mercury recovery or reclamation facility.

Safety-Kleen handles all types of batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in

40 CFR Part 273. Batteries not meeting those standards may be managed as 10-day transfer waste.

270.15(b)(1) *Waste Compatibility with Containers*

264.172

It is Safety-Kleen's standard operating procedure to use containers made of, or lined with, materials that will not react with, and are otherwise compatible with, the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired.

Safety-Kleen manages a limited number of permitted waste streams, most are liquid, and most originate from new products that are supplied to its customers in the original DOT approved containers. Safety-Kleen has evaluated the chemical composition of these products and wastes and has determined that the wastes are compatible with the containers in which they are stored.

Note: None of the permitted waste streams carry the D002 waste code for corrosivity. In most cases where a container is not available from a Safety-Kleen-supplied product, Safety-Kleen supplies the customer with a DOT approved container for that waste type (e.g., when Safety-Kleen collects Dry Cleaning wastes).

270.16(a), 264.190(a) *Waste Compatibility with Tank System*

264.191(b)(2), 264.192(a)(2)

The only hazardous waste stored in the RCRA-Permitted Hazardous Waste Tank (Used Solvent) is used parts washer solvent. This material has been analyzed and found to be compatible with the steel tank in which it is stored.

Waste in Piles, Waste on Drip Pads

Safety-Kleen's Tallahassee facility does not have any of these processes on site. Therefore, these sections do not apply.

Part II

A. General

6. Waste Analysis Plan (WAP)

The waste analysis plan (WAP) for the Safety-Kleen Tallahassee facility is found in the Part II WAP section.

Part II

A. General

7. 264.12 Required Notices, 264 Subpart E Manifest System, Recordkeeping, and Reporting Waste Manifests

Appropriate shipping papers/manifests are used, based on the monthly quantity of hazardous waste generated by the customer. Safety-Kleen services all three categories of generators in Florida – Very Small Quantity Generators (VSQGs), SQGs, and LQGs. VSQG's used parts washer solvent is removed via a service document/bill of lading and no manifest or Land Disposal Restrictions (LDR) form is required. Appropriate records are kept by the Branch as to the date of waste pick-up, quantity, and other data on the service document. A hazardous waste manifest and LDR form is completed for each SQG. LQGs' used parts washer solvent is always manifested (if hazardous) and an LDR form completed.

Used parts washer solvent (from each Safety-Kleen customer, regardless of generator status) is brought back to the Branch and dumped into the wet dumpster at return/fill shelter and pumped to the RCRA-Permitted Hazardous Waste Tank (Used Solvent). This tank contains the used parts washer solvent of many customers and is managed as hazardous waste. The contents are regularly sent to a properly permitted facility for management. These loads are always manifested and accompanied by an LDR form. Shipments of parts washer solvent dumpster mud are also manifested accordingly. Required records are kept at the Branch in accordance with regulatory timeframes.

In accordance with 40 CFR 264.71 through 77, Safety-Kleen will ensure that:

1. Customers who are required to provide a manifest do so;
2. The manifests are prepared and signed properly; and
3. Copies are distributed and kept on file, as required.

In addition, discrepancies must be remediated in accordance with 40 CFR 264.72 and un-manifested wastes will be reported as described under 40 CFR 264.76.

Required Notices

If Safety-Kleen arranges to receive hazardous waste from a foreign source, the Regional Administrator must be notified in writing at least four weeks in advance of the date the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required. Safety-Kleen informs its customers in writing (i.e., on each service document) that the facility has the appropriate permit(s) for, and, will accept the waste the generator is shipping. Safety-Kleen keeps a copy of this written notice as part of the operating record.

Before transferring ownership or operation of this facility during its operating life, Safety-Kleen will notify the new owner or operator in writing of the requirements of Part 264 and Part 270 of Chapter 40 in the Code of Federal Regulations.

Biennial reports required by Chapter 62-730.180(4) FAC, will be prepared and submitted by Safety-Kleen, and these records will also be available at the facility for review. The biennial report will be submitted to the Regional Administrator and/or FDEP by March 1 during each even year (1990 being the first year) on EPA form 8700-13B. The report will cover facility activities during the previous calendar years and will include:

- The EPA identification number, and address of the facility;
- The calendar years covered by the report;
- The method of treatment, storage, and disposal for each hazardous waste; and
- A certification signed by the owner or operator of the facility or the authorized representative.

Operating Record

An operating record which contains the information required under 40 CFR 264.73 is maintained and all records and logs are available at the facility, in accordance with 40 CFR 264.74. An electronic copy of the operating record is retained at the facility to comply with 40 CFR 264.73(b).

The following information will be maintained in writing in the operation record for the facility:

- A description and quantity of each hazardous waste received;
- The date and storage method for such hazardous waste;
- The location of each hazardous waste stored within the facility;
- Records and results of waste analyses performed;
- Summary reports and details of all incidents that require implementation of the contingency plan;
- Monitoring, testing, or analytical data, and corrective action where required by Subpart F and other applicable sections of 40 CFR 264;
- All closure cost estimates under 40 CFR 264.142 and all contingent post-closure cost estimates under 40 CFR 264.144;
- Records of quantities and date of placement for each shipment of hazardous waste placed in land disposal units under an extension to the effective date of any land disposal restriction granted;
- For any restricted waste generated that can be land disposed without further treatment, and is sent to a land disposal facility, a notice and certification will be sent to the treatment, storage, or land disposal facility with the waste. The notice will state that the waste meets the applicable treatment standards set forth in Subpart D of 40 CFR 268 and applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). The notice will include the following information:
 1. EPA Hazardous Waste Number; and
 2. The corresponding treatment standards and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).
- Training records, inspection reports, waste minimization certifications, closure plan, and Corrective Action Documents.

Further, the LDR certification will be signed by an authorized representative and will state the following:

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant

penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Section 264.74 requires that all records, including plans, must be furnished upon request to duly designated representative of the Regional Administrator, and this requirement will be honored. A copy of all records of waste disposal locations and quantities will be submitted to the Regional Administrator and/or FDEP upon closure of the facility, if applicable.

As a registered transporter and storage facility for mercury-containing lamps and devices destined for recycling, the Branch complies with the record keeping requirements of FAC 62-737.

Land Ban Notification/Certification Forms

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

1. Special forms for each regularly handled wastes types (e.g., parts washer solvent, immersion cleaner, and perchloroethylene); or
2. A general form that must be completed for unique or nonstandard waste streams.

The notice is required paperwork for the streams handled by Safety-Kleen. When a shipment with the notice is received, the notice is kept in the files of the receiving facility with the manifest or with the pre-print if a manifest is not used.

The facility will comply with the RCRA permitting conditions found in 40 CFR Part 270.30(I)(1) 270.30(I)(2), and 270.30(I)(6). The facility will comply with the recordkeeping requirements found in 40 CFR Part 264.1064 and 264.1089.

Part II

A. General

8. 40 CFR Part 270.3

The Federal laws found in 40 CFR Part 270.3 do apply to Safety-Kleen although they do not appear to be applicable at this time.

Tab 3

Part II

Preparedness, Prevention, Contingency Plan, and
Emergency Procedures for Daily Business Operations

***SAFETY-KLEEN SYSTEMS, INC.
TALLAHASSEE FACILITY***

***PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND
EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS***

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**Safety-Kleen
Tallahassee Branch
Emergency Coordinator Phone Numbers**

Primary:	Tom Yougman	Alternate:	Bobby Mitchell
	6507 Ben Ali Ct.		127 Springhill Rd.
	Tallahassee, FL 32309		Cairo, GA 39827
	Office: (850) 567-8762		Office (850) 567-8762
	Cell: (850) 544-1316		Cell: (850) 567-8139

Emergency Notification Numbers

(Safety-Kleen 24 Hour Emergency Response Reporting System): (800) 468-1760

Florida DEP- Northwest District, 160 West Government St., Ste. 308, Pensacola, FL
32502-5794: (850) 595-8300 (Monday – Friday, 8:00 a.m. to 5:00 p.m. except Holidays)

State Warning Point: (800) 320-0519

If you are unable to contact the FDEP at the above, please call:
National Response Center 1-800-424-8802

Poison Control Center: (800) 222-1222 or (800) 833-3505

Emergency Teams to be Notified:

Tallahassee Fire Department
327 North Adams
Tallahassee, FL 32301
Phone: **911**

Tallahassee Police Department
234 East 7th Avenue
Tallahassee, FL 32302
Phone: **911**

Tallahassee Memorial HealthCare
1300 Miccosukee Road
Tallahassee, FL 32308
Phone: (850) 431-1155

Contingency Plan Quick Reference Guide

Safety-Kleen Systems, Inc.

4426 Entrepot Blvd.

Tallahassee, FL 32310

Facility Contacts:

Primary Emergency Coordinator: Tom Youngman Mobile Number (24/7): (850) 544-1316
Secondary Emergency Coordinator: Bobby Mitchell Mobile Number (24/7): (850) 567-8139
Safety-Kleen Emergency Response Number: (24/7): (800) 468-1760

Note: Safety-Kleen typically operates Monday-Friday 8:00 am – 5:00 pm. The Safety-Kleen Emergency Response Number is available 24/7 for response to emergency situations at all Safety-Kleen facilities.

Hazardous Waste Information: (I=ignitable, C=corrosive, R=reactive, T=toxic)

Name of Waste	Waste codes/hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment Personnel
Branch Contaminated Debris	D001 (I, flash point <140 °F), D004 (T), D005 (T); F002, F003, F005 (tetrachloroethylene, trichloroethylene, acetone, methyl ethyl ketone, T)	Central warehouse, container storage area	Four, 55-gallon drums (1,600 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Branch Contaminated Debris	D001 (I, flash point <140 °F), D004 (T), D005 (toxicity); F002, F003, F005(tetrachloroethylene, trichloroethylene, acetone, methyl ethyl ketone, T)	One Satellite accumulation areas as noted with (BCD) facility figure, R/F Station	One, 55-gallon drum (400 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Waste Flammable Liquids/Toxic	D001 (I, flash point <140 °F), D035, U002 (T), (Acetone)	Container storage area & transfer waste storage areas	Two, 30-gallon drums (200 lbs.)	Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.	

Hazardous Waste Information (continued):

Name of Waste	Waste codes/hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Spent aerosol cans	D001 (I, flash point <140 °F), D035 (T)	Central warehouse, container storage area	One, 30-gallon drum (100 lbs.)	In the event of excessive temperatures (fire) cans may depressurize and possibly explode in severe cases.	None
Spent aerosol cans	D001 (I, flash point <140 °F), D035 (T)	NE warehouse – across from transfer area noted by (AC) on figure	One, 30-gallon drum (100 lbs.)	In the event of excessive temperatures (fire) cans may depressurize and possibly explode in severe cases.	None
Paint Gun Cleaner	D001 (I, flash point <140 °F), D018, D035; F003, F005	Central warehouse, container storage area	Ten, 5-gallon drums (400 lbs.)	In case of fire use carbon dioxide, regular foam, regular dry chemical, water spray and water fog for extinction. Use PPE to prevent contact with skin/eyes/respiratory system. Prevent sources of ignition and open flames.	If inhaled remove person to fresh air, if in eyes rinse cautiously with water for several minutes, if on skin remove immediately all clothing and rinse skin with water, if swallowed immediately call poison center, do not induce vomiting.
Waste Flammable Liquids	D001 (I, flash point <140 °F), D018, U002, U019, U154, U159 (T) (Acetone, Methanol)	Central Warehouse - Transfer waste storage area	Five, 5-gallon drums (50 lbs.)	Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.	Treat symptomatically

Hazardous Waste Information (continued):

Name of Waste	Waste codes/hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Paint Related Wastes	D001 (I, flash point <140 °F), D018 (T), D035 (T); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, T)	Central warehouse, container storage area	Four, 55-gallon drums (1,600 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Dry Cleaning Waste (Perc) Bottoms	D007, D039, D040 (T); F002 (T)	Central warehouse, container storage area	One, 15-gallon drums (160 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment. Use PPE to avoid absorption into the respiratory tract.	Evaluate and support the airways, breathing and circulation. Establish intravenous access in seriously ill patients. Continuously monitor cardiac rhythm.
Dry Cleaning Waste (Perc) Filters	D007, D039, D040 (T); F002 (T)	Central warehouse, container storage area	One, 30-gallon drums (89 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment. Use PPE to avoid absorption into the respiratory tract.	Evaluate and support the airways, breathing and circulation. Establish intravenous access in seriously ill patients. Continuously monitor cardiac rhythm.
Waste Toxic Liquids, Organic	U035, U036, U043, U044, U052, U058 (T) (Barium, Phenol)	Central warehouse - Transfer waste storage area	Ten, 5-gallon drums (400 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	Treat symptomatically

Hazardous Waste Information (continued):

Name of Waste	Waste codes/hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Dry Cleaning Waste (Naphtha) Bottoms	D001 (I, flash point <140 °F), D007, D039, D040 (T)	Central warehouse, container storage area	One, 16-gallon drum (162 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Dry Cleaning Waste (Naphtha) Filters	D001 (I, flash point <140 °F), D007, D039, D040 (T)	Central warehouse, container storage area	One, 16-gallon drum (120 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Immersion Cleaner	D027, D039, D040 (T)	Central warehouse, container storage area	Four, 16-gallon drums (280 lbs.)	Fire response: use carbon dioxide/dry chemical/alcohol resistant foam/water spray or water fog.	None
Hydrochloric Acid	D002 (C)	Transfer waste storage area (NE portion of the central warehouse)	Two, 55-gallon drums (800 lbs.)	Suitable extinguishing agents: water, dry chemical, chemical foam, carbon dioxide or alcohol-resistant foam. Combustion products may include carbon oxides or other toxic vapors. Use PPE to protect eyes, skin, and respiratory tract.	Move exposed persons to fresh air, wash affected areas with soap/water, rinse affected areas with water for at least 15 minutes. Seek medical attention immediately.
Waste Toxic Solids, Organic	U002, U010, U024, U025, U056 (T) (Selenium)	Central Warehouse - Transfer waste storage area	Eight, 15-gallon drums (400 Lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	Treat symptomatically

Hazardous Waste Information (continued):

Name of Waste	Waste codes/hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Sulfuric Acid	D002 (C)	Transfer waste storage area (NE portion of central warehouse)	Two, 55-gallon drums (800 lbs.)	Suitable extinguishing agents: water, dry chemical, chemical foam, carbon dioxide or alcohol-resistant foam. Thermal decomposition can lead to release of irritating gases & vapors. Use PPE to protect eyes, skin, & respiratory tract.	Move exposed persons to fresh air, wash affected areas with soap/water, rinse affected areas with water for at least 15 minutes. Seek medical attention immediately.
Waste Gasoline	D001 (I, flash point <140 °F), D008, D018 (T)	Transfer waste storage area (NE portion of central warehouse)	Two, 55-gallon drums (800 lbs.)	Use dry chemical, CO2, water spray or fire-fighting foam to extinguish. Fire responders should use approved pressure-demand self-contained breathing apparatus with full-face piece and full protective clothing.	Do not induce vomiting if swallowed, rinse mouth, remove any contaminated clothing, rinse affected eye/skin areas with water. Seek immediate medical attention.
Waste Flammable Liquids (Acetone, Dichloromethane)	D001, D035 (I, T)	Transfer waste storage area (NE portion of central warehouse)	One, 155-gallon drums (115 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Waste Mercury	D009, U151 (T) (Mercury)	Central Warehouse - Transfer waste storage area	Two, 5-gallon drums (20 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	Treat symptomatically

Hazardous Waste Information (continued):

Name of Waste	Waste codes/hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Waste Petroleum Distillates	D001 (I, flash point <140 °F)	Transfer waste storage area (NE portion of central warehouse)	One, 55-gallon drums (400 lbs.)	Prevent sources of ignition and open flames.	None
Hazardous Waste Solid (Chromium, Silver)	D007, D011 (T)	Transfer waste storage area (NE portion of central warehouse)	One, 55-gallon drum (450 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Paint Related Waste	D001 (I, flash point <140 °F), D018 (T), D035 (T); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, T)	Transfer waste storage area (NE portion of central warehouse)	Six, 55-gallon drums (2,400 lbs.)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Trichloroethylene	D040 (T); F001 Trichloroethylene	Transfer waste storage area (NE portion of central warehouse)	Two, 30-gallon drums (402 lbs.)	Avoid breathing vapor or mist, provide adequate ventilation, use appropriate PPE	In case of inhalation of decomposition products in a fire, symptoms may be delayed. The exposed person may need to be kept under medical surveillance for 48 hours.


Hazardous Waste Information (continued):

Name of Waste	Waste codes/hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Nitrobenzene	D036 (T); F004	Transfer waste storage area (NE portion of central warehouse"	Two, 30-gallon drums (500 lbs.)	Remove sources of ignition, take precautionary measures against static discharges	Immediate medical attention required, wash/rinse affected areas immediately and seek medical attention.
Used Parts Washer Solvent	D001 (I, flash point <140 °F), D018, D039, D040 (T)	RCRA - Permitted Hazardous Waste Tank (Used Solvent) 15,000-gallon capacity	Fourteen thousand Two Hundred gallons. (Note: Normal operating capacity is approximately 7,000 gallons)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Waste Flammable Liquids, Toxic	D001 (I, flash point <140 °F), F003, U055, U113 (T) (Ethyl Acrylate, Cumene)	Central Warehouse - Transfer waste storage areas	Six, 5-gallon drums (180 lbs.)	Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.	Treat symptomatically

STREET MAP W/HYDRANTS AND ACCESS POINTS

4426 ENTREPOT BLVD. TALLAHASSEE, FL. 32310

Legend

 4426 Entrepot Blvd



***PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND EMERGENCY
PROCEDURES FOR DAILY BUSINESS OPERATIONS***

GENERAL INFORMATION

Purpose

The preparedness, prevention, and contingency plan and emergency procedures are designed to comply with 40 CFR Part 264.30-56. In addition, the procedures in the plan ensure that Safety-Kleen reduces the possibility of emergency situations and, should they occur, respond in a manner to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to the air, soil, surface water, or ground water at the facility.

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

General Description of Activities

The business activities conducted at the Tallahassee Branch relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provisions of a solvent leasing service for the customers. Clean solvents are distributed from, and the used solvents returned to, the Branch, where separate storage tanks are utilized for the storage of clean and used parts washer solvent. One 15,000-gallon fresh parts washer solvent storage tank currently is utilized at the facility. In addition, a 15,000-gallon tank is used to store hazardous waste parts washer solvent (RCRA-Permitted Hazardous Waste Tank (Used Solvent)), and two 15,000-gallon tanks are used for storage of Used Oil and an 8,000-gallon double-walled tank used for storage of Used Antifreeze. Warehouse space is designated for the storage of containers of both clean and used immersion cleaner, parts washer solvent, paint waste, Fluid Recovery Services (FRS) wastes, and dry-cleaning wastes. Over-pack containers are used for the management of containers whose integrity has been compromised.

Parts washer solvents are transported in covered containers between the Branch and customers. Upon returning to the Branch, the used parts washer solvent is transferred from the containers into a wet dumpster (solvent return receptacle) at the Return/Fill Shelter. There is a screen at the bottom of the wet dumpster in which coarse solids in the parts washer solvents are retained. These solids are removed at the end of each day after all used parts washer solvent is dumped. Used parts washer solvent from the wet dumpster flows via 2-inch piping into the RCRA-Permitted Hazardous Waste Tank (Used Solvent). This piping runs west under the return/fill dock, and then turns south to the tank. The piping is connected by threaded connectors from the wet dumpsters to the end of the return/fill (inside secondary containment) and once leaving the return/fill it is connected by welded connectors until it reaches the permitted tank storage unit. Bulk hazardous waste parts washer solvent is picked up approximately every 20 days by a tanker truck from a Safety-Kleen TSDF, which at the same time delivers clean parts washer solvent. Solids/sludges removed from the wet dumpster are placed in a satellite accumulation container located next to the wet dumpster. When full, this container is stored as Branch generated waste in the container storage area for later shipment to a permitted Safety-Kleen or Clean Harbors TSDF for reclamation or disposal.

The immersion cleaner remains in a covered container at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the Branch. This waste will be stored in the permitted container storage or 10-day transfer area.

Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers. Dry cleaning wastes handled by Safety-Kleen consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms, all of which fall into the categories of either perchloroethylene-based waste or naphtha-based waste. The dry cleaning wastes are packaged on the customer's premises in containers. Dry cleaning wastes are managed in the permitted container storage or 10-day transfer area.

Used antifreeze collected and managed by Safety-Kleen within Florida is done so with the intent of it being recycled. At the customer's location, Safety-Kleen pumps used antifreeze into a dedicated compartment of a Safety-Kleen used oil tanker truck and transports the material to the branch for off-loading into a dedicated vessel or container for storage. The glycol is then sent to a recycler for processing into a pure product which is then sold on the open market. This

procedure is in accordance with FDEP's *the Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. The Florida Department of Environmental Protection (FDEP) has determined this waste stream can be handled as non-hazardous as long as it is destined for recycling. If used antifreeze collected by the Safety-Kleen Tallahassee facility is sent to a facility other than the East Chicago re-refinery it will be managed as follows. If the glycol percentage is not acceptable at a glycol recycling facility, then a representative sample will be taken and sent for TCLP analysis to determine if it is a hazardous waste. It will be managed properly according to the TCLP analysis result. In addition, Safety-Kleen sells its' own private label antifreeze in 55-gallon containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is then shipped to SK distribution centers, and then shipped to a recycler.

Safety-Kleen offers a used oil collection service commonly referred to as Safety-Kleen Oil Services (SKOS). Safety-Kleen Tallahassee is a registered Used Oil and Used Oil Filter Facility. Used oil is collected by straight tanker trucks and transported to the Tallahassee branch for storage in two 15,000 gallon above ground storage tanks. The used oil is then typically transported to the SK Pompano Beach/Ocala facility where it is shipped via railcar to the Safety-Kleen East Chicago, IN re-refinery for processing. The branch is registered in Florida as a used oil transporter, and transfer facility.

Safety-Kleen offers a used oil filter (UOF) collection service to customers. Used Oil Filters are stored in the northwest portion of the Return/Fill Shelter.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and are stored in the permitted container storage area or 10-day transfer areas.

The Fluid Recovery Service (FRS) is a program in which the facility manages containerized wastes as transfer wastes. These wastes are packaged in USDOT authorized packaging which are not opened until they reach a permitted Safety-Kleen/Clean Harbors TSDF. The FRS wastes are managed as transfer wastes. FRS hazardous wastes are managed as 10-day transfer wastes. While in storage at the branch, these wastes will be located in their respective transfer waste areas. The FRS wastes may also undergo branch-to-branch or truck-to-truck transfer. This transfer will occur at the return/fill shelter inside secondary containment.

The waste products exhibit essentially the same biological, physical, and chemical properties as the fresh product. Used products are basically fresh products with impurities of dirt and metals. Safety Data Sheets (SDSs) for each hazardous material are available at the Branch and on the Safety-Kleen website.

The Branch is registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the requirements of Florida Administrative Code (FAC) 62-737.400, including all training requirements. As a registered small quantity handler of universal waste lamps/mercury devices, the Branch can only store up to 2,000 kilograms of lamps or 100 kg of mercury-containing devices at any one time. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as non-hazardous transfer wastes. The boxes/lamps are stored at the Branch in a designated area within the transfer waste storage area and labeled according to FAC 62-737.400(5)(b). This storage area is partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic. Figure 5.6-1 shows the basic site and floor plans and the locations of waste management facilities and facility storage. Part I D.3 provides information regarding permitted/transfer/site generated wastes handled at the facility.

Safety-Kleen handles all types of batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting these standards may be managed as 10-day transfer hazardous waste.

Note: All waste containers, including the tanker trucks, are unloaded within 72 hrs. of arrival at the facility and all waste containers are shipped outbound within 72 hrs. of being loaded for shipment.

INSPECTION PROCEDURES

Inspection of Safety Equipment

The purpose of the inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of emergency and spill control equipment to ensure proper operation, and to maintain compliance. Table 5.2 1 is an Inspection Schedule. Inspections of Safety/Security equipment are completed electronically (CO Safety Security Inspection), or on paper using this same form if the electronic system is not available. A copy of the inspection form is found at the end of this plan. The Branch Manager, or designee, is responsible for carrying out the inspection in accordance with the following procedure and schedule.

- A weekly inspection of fire extinguishers must be performed to ensure that the tag date has not expired, and the units are properly charged and accessible.
- A weekly inspection of eyewash stands must be performed to assure accessibility, and proper operation of this equipment. Inventory of the first-aid kit must be checked on a weekly basis.
- A weekly check of the supply of spill control equipment (absorbent material) must be performed.
- A weekly check of the conditions and inventory of other emergency equipment will be made. This includes gloves, aprons, goggles, respirators, and other personal protective equipment.
- A weekly check of the condition and inventory of communication devices will be made. This includes telephones, intercom, and emergency alarms.

Inspection of Security Equipment

Security equipment inspections are completed weekly on the CO Safety Security Inspection form. Security features include: gates and locks –looking for any evidence of sticking, corrosion, or unusual activity. The facility perimeter fence will be checked weekly for deterioration, gaps, and broken wire ties. Facility signage will be inspected for clarity. The container storage area security alarm system will be checked for operational status.

Inspection of Waste Management Facilities

The purpose of the inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of hazardous waste management and other material management

facilities to ensure proper operation and maintain compliance. Table 5.2-1 provides an Inspection Schedule. The Branch Manager, or designee, is responsible for carrying out the inspections of all hazardous waste management facilities in accordance with the following procedure and schedule.

Daily inspections of aboveground tanks will include the following:

- Note volume in tank.
- Observe tank exterior for loose anchoring, wet spots, and leaks.
- Check the automatic high level alarm. In addition, check the gauge level for each of the tanks to confirm the proper functioning of the automatic alarm system and to determine unexpected deviations in tank measuring data, or a sudden drop in liquid level, which may indicate leakage.
- Inspect secondary containment walls and piping/piping supports from the return/fill to the tank farm.
- Inspect transfer pumps for leaking seals and overheated motors.
- Inspect the solvent dispensing hose, fittings, and valve for any leaks, damage, or wear that could cause a leak to develop.
- Inspect the valves for proper seal. Stem leaks from worn glands and warped valve bodies should be repaired. If the valve cannot be repaired, replace the unit.

Also, the tanks will be visually inspected and tested periodically. Daily inspection of the solvent return receptacles (wet dumpsters) will consist of an inspection for leaks and excess dumpster sludge/solid build-up.

Daily inspections of the container storage area include the following:

- Verify that total volume is within permitted limits.
- Physically examine the condition of containers to verify that leaks have not occurred since the last inspection.
- Verify that all container identification, dates, and hazardous waste labels are attached and current.
- Inspect container placement and stacking such as aisle space, height, and stability of stacks.
- Examine containment areas to detect signs of deterioration and failure of the containment system such as cracks, breakage, settlement, and spillage.

Corrective Action

Any discrepancies or deficiencies found during routine inspections will be recorded in the Corporate Work Ticket Workbench. At this time an evaluation of the seriousness of the problem will be conducted and a decision made if the situation requires immediate action or the problem can be handled as routine maintenance. If the problem poses a threat to human health or the environment, action will be taken immediately. The Branch Manager has the overall responsibility for resolving any discrepancies found during the routine inspection.

EMERGENCY NOTIFICATION

Emergency Coordinator

The Branch Manager or designee is the emergency coordinator. Page iii at the beginning of the plan includes the names, home addresses, and both office and home phone numbers of the primary emergency coordinator and alternate. At least one employee will always be either present on the facility premises or on call with responsibility for coordinating all emergency response measures. This primary emergency coordinator and alternate emergency coordinator are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out the contingency plan.

EMERGENCY RESPONSE AGENCIES AND TEAM MEMBERS

The agencies and response team members to be notified whenever an imminent or actual emergency occurs are presented on page iii, located at the beginning of this plan.

ACTIONS OF THE EMERGENCY COORDINATOR

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or the designee when the emergency coordinator is on call) must immediately:

- a. Notify all facility personnel present of the emergency. The relatively small size of this facility makes direct verbal communication the most expedient form of emergency notification. The emergency coordinator may also elect to proceed to the front of the building and repeatedly sound a car horn with five (5) loud bursts to notify building occupants of an emergency. A head count will be performed by the emergency coordinator in the event of evacuation.
- b. Notify appropriate state or local agencies with designated response roles if their help is needed.
- c. Summon the primary emergency coordinator, if that person is absent.

Whenever a release, fire, or explosion occurs, the emergency coordinator must immediately identify the character, exact source, amount, and areal extent of any released materials. Because of the limited types of chemicals in storage, the identification processes can easily be performed visually.

Procedure for Assessing Possible Hazard to the Environment and Human Health

- After identification of the character, source, amount, and extent of a release, fire, or explosion, the emergency coordinator must decide whether the situation can be contained or cleaned up by plant personnel and equipment.
- If a fire or explosion is determined uncontrollable by plant personnel or threatening neighboring establishments or population, assistance from a local emergency response agency shall be summoned immediately and an evacuation order issued.
- In case of a release outside of the containment area that is deemed immediately uncontainable or unrecoverable, Safety-Kleen's 24 hr. emergency response system (800) 468-1760) and/or local emergency response agency shall be called in.
- After termination of a fire or explosion or containment and preliminary cleanup of a spill, evaluate whether residues in the form of gas or liquid have become airborne, seeped into ground water, and/or flowed into surface water bodies.
- Expert assistance should be requested to determine whether the escaped materials are potentially harmful and whether the receiving medium ultimately will be a populated area, public water supply source, a private well, or an environmentally sensitive area.
- Additional steps shall then be taken to mitigate the potential impact on the environment and human health, in accordance with expert recommendations.

If the emergency coordinator determines that the facility has had a release, fire, or explosion or other emergency that could threaten human health, or the environment outside the facility, the coordinator must report those findings, as follows:

- If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities. The coordinator must be available to help appropriate officials decide whether local areas should be evacuated.
- The coordinator must immediately notify the State Warning Point at (800) 320-0519 (24 hours-7 days a week availability).
- The coordinator must immediately notify the Northwest District of the FDEP, (850) 595-8300 during regular business hours, and if a release equals or exceeds the Reportable Quantity (RQ) the National Response Center (800) 424-8802 must immediately (within 15 minutes) be contacted.

The report must include:

- (1) Name and telephone number of notifier;
- (2) Name and address of facility;
- (3) Time and type of incident (e.g., release, fire);
- (4) Name and quantity of material(s) involved, to the extent known;
- (5) The extent of injuries, if any; and
- (6) The possible hazards to human health, or the environment outside the facility.

The facility will comply with reporting requirements outlined within the permit conditions of the operating permit.

Immediate assistance in assessing and responding to an emergency is obtained by the emergency coordinator by calling the 24-hour Safety-Kleen emergency number ((800) 468-1760). The 24 hour emergency number is used by Safety-Kleen to respond to all reports of spills or chemical emergencies. All Safety-Kleen facilities in the state use this 24-hour emergency number. This allows Safety-Kleen to respond to any emergency with a maximum of effort, thereby reducing the threat to human health or the environment.

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers. If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate. Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated or stored until cleanup procedures are completed; and
- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

The owner or operator must notify the appropriate state and local authorities that the facility is in compliance with the requirements of the preceding paragraph, before operations are resumed in the affected area(s) of the facility.

The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the owner must submit a written report on the incident to the Northwest District of the FDEP, at 160 W. Government St, Suite 308, Pensacola, FL 32502. The report must include:

1. Name, address, and telephone number of the owner or operator;
2. Name, address, and telephone number of the facility;
3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

POTENTIAL SPILL SOURCES

The following is a list of activities that have the potential for a spill equal to, or less than 55 gallons of waste:

1. Moving of containers.
Every time a container is moved, the possibility exists that it could tip over or be dropped. To minimize the possibility of spillage of solvent under those conditions, all container lids must be confirmed to be secure before movement.
2. Delivery truck container transfers.
 - a. Individual delivery containers hold from 5 to 55 gallons of waste, a quantity which can be contained by oil sorbent clay or pads, if accidentally spilled.
 - b. Each vehicle is equipped with a hoist and hand cart for ease of moving clean product containers off the truck and into the customer's facility and returning the waste containers to the truck.
 - c. Lids are secured on containers prior to movement to prevent a spill.
 - d. Each truck contains a complete spill kit, shovel, and a quantity of sorbent material to contain spills equal to, or less than 55-gallons.
 - e. The cargo must be secured in the route vehicle before transit.

Spills Inside Buildings

In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. Following the instructions of the Safety Data Sheet (SDS), a worker would enter the area wearing appropriate protective equipment (PPE). Safety-Kleen spill response PPE requirements are: uniform (company issued), gloves (if chemical present use supported Neoprene as an outer glove), boots (steel toe with slip resistant soles), apron (if chemical present and SDS requirement). Dependent on the amount of the material spilled, clean-up will take place with absorbent material, or wet vacuum. Spills inside the building will be contained by the existing secondary containment structures, or by using available absorbent material and booms. Proper characterization, treatment, and disposal of the material and decontamination solution used to clean the affected area will be done on a case by case basis

depending on the material released. All material will be disposed of per federal, state, and local regulations. The cleanup is completed only when the workers have cleaned themselves and the emergency equipment with soap and water.

Spills on Concrete Pads

Concrete pads in loading and unloading areas are, in most cases, equipped with secondary containment. Under most spill conditions, product can be totally contained on the concrete surface and in the containment system. Upon containment, arrangements must be immediately undertaken to recover the material. Any soil that may be involved must be removed and handled in the same manner as the material spilled.

Tank Spills or Leakage

Aboveground tanks within the Permitted Tank Storage Unit (Secondary Containment) are underlain by a concrete slab and surrounded by a concrete dike to contain any leaked, spilled or released material. The containment system has been sized in accordance with the applicable regulations, and the material will be totally contained under most leak, spill or release conditions. Should a leak, spill or release occur, arrangements must be immediately undertaken to recover the material. In the event of leak, spill, or release that involves a maintenance or integrity issue, tank repair or replacement will be initiated, whenever is deemed necessary. Any soil that may be involved must be removed and handled in the same manner as the material spilled.

40 CFR Part 264.196(d)(2) exempts notification/reports for leaks, spills, or releases equal to or less than one pound, and that are immediately contained and cleaned up.

Spill Control Procedures

If a solid or hazardous waste, or hazardous material discharge occurs:

1. Stop the discharge, if possible, by immediately transferring the liquid to a good container. If the discharge involves a tank, immediately close all valves to the tank.
2. Retain, contain, or slow the flow of the material, if possible, by diking with sorbent pad or dirt. Based on the seriousness of the incident, the emergency coordinator will select the level of personal protective equipment required to address the incident. Pump and mop up the liquid from the floor into a good container and return the container to storage for subsequent shipment to a Safety-Kleen/Clean Harbors recycle center for

- reclamation/disposal. The area and equipment that comes in contact with the spill must be decontaminated with soap and water. All residues resulting from containment and decontamination will be collected for proper characterization.
3. If the material escapes the containment efforts, immediately call the 24-hour Safety-Kleen emergency number with response time less than two hours (page iii). Record the date, time, and name of person taking the message. The State Warning Point ((800) 320-0519) is to be contacted as soon as possible, but no later than within one working day of discovery of the release. If a release equals or exceeds the Reportable Quantity (RQ) the National Response Center ((800) 424-8802) is to be contacted within 15 minutes.
 4. Immediately recover spilled solvent to reduce property and environmental damage using the emergency and safety equipment stored onsite for such situations (Figure 5.6-1 and Table 5.6-1) or call in emergency response contractors (page iii). Start recovery operations immediately. After recovery of spilled solvent, wash all contaminated impervious surfaces and equipment with soap and water. The residue of spill- or fire-contaminated soils and waste waters must be removed and disposed of at a Safety-Kleen/Clean Harbors recycle center. In addition, the recovered solvent will be sent to a Safety-Kleen/Clean Harbors recycle center for reclamation.
 5. The person reporting a spill should be prepared to give their name, position, company name, address, and telephone number. The person reporting also should give the nature of the material spilled (e.g., immersion cleaner, etc.) and, if possible, some estimate of the amount, and whether it is near a stream or could enter a stream by flowing through ditches or storm sewers. If assistance is needed, the emergency coordinator should describe the containment status and specify any additional equipment needed. When reporting a spill, record the date and time of the call and the name of the person answering the call at the above number. Spill prevention plans are reviewed with facility personnel every year, and records of the training are kept by the facility.

Spill/Release Response to Solid (Physical State) Waste(s)

Response to a non-liquid waste (solid physical state) will require the use of a shovel to place the material into a new container. If the material is powder-like/particulate matter care should be taken so as not to create dust or cause the material to become airborne. After the bulk of the material is recovered a damp absorbent pad may be used to clean up residual material that cannot be captured with the shovel.

Information on every spill will be recorded through an internal database. A notification of each spill will be sent to the Corporate Environmental Compliance and Health and Safety Departments.

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

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

The facility will complete all permit condition spill reporting as required, and follow the requirements of Chapter 62-150, F.A.C. Hazardous Substance Release Notification.

Containment Systems

Containerized Wastes

Hazardous waste container storage takes place inside the container storage area and transfer storage areas located in the warehouse building and transfer waste storage area located in the Return/Fill Shelter (depicted on Figure 5.1-3). The containment system in the container storage area is sealed with an impermeable coating and is free of cracks. Containers are stored on pallets whenever possible, and double stacked. The warehouse has concrete floors, and collection trenches to form spill containment systems within the area. The container storage area is approximately 48' x 78' area with a total containment capacity of 2,521.6 gallons. The container storage area has one containment trench with a capacity of 405.2 gallons and the floor is sloped towards the containment trench which adds an additional 2,323.7 gallons of containment capacity. The maximum storage capacity is 29,268-gallons with 6,912 gallons being hazardous waste container storage and the balance being various products. Wastes stored in this area may include used oil filters, paint wastes, branch generated debris, dry cleaning waste, spent

immersion cleaner, and any overflow transfer waste if necessary. The types and numbers of containers may vary; however, the storage capacities will not be exceeded.

In the container storage area, containers are handled with a fork-lift and/or a hand-truck free of sharp points and stacked by hand. Every time a container is moved, the possibility exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, container lids are secured, and containers are kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into a safe container. Each route truck is equipped with a lift gate or an electric hoist. The appropriate device is used in the loading/unloading operation to minimize chances for spillage and/or employee injury.

Containerized wastes at the Tallahassee facility are loaded/unloaded in the vicinity of the contained concrete dock on the northwestern side of the building (Figure 5.6-1) and return/fill dock.

Because these areas are fully enclosed, spills originating in these areas should not come in to contact with stormwater.

FRS Wastes/10-Day Transfer Wastes

Transfer wastes will be located in the areas depicted in Figure 5.6-1. The containment system in the warehouse is coated, free of cracks, and is sufficiently impervious to prevent seepage into or through the concrete. FRS hazardous wastes are 10-day transfer only. They are not required to have containment, though they are stored in areas with containment. These areas are fully enclosed within the building. Spills in these areas should not come into contact with stormwater.

All containers are sealed during movement and are located within diked, concrete floored areas to contain any potential spill. Spills with quantities equal to, or less than 55-gallons at any time can be cleaned up immediately through the use of hand-held electric pumps, mops, wet/dry vacuums, or sorbent materials, should a spill occur. Any spilled waste is contained and packaged for offsite recycling/reclamation. All containerized waste movement is performed manually, by a pallet jack, or propane fueled forklift truck. Therefore, power outages are not expected to threaten employee safety.

Return/Fill Shelter

The return/fill shelter (Figure 5.6-1) is located between the office and the Warehouse Container Storage Building. The return/fill shelter has an elevated steel grate, which is positioned approximately 33 inches above the concrete floor with 4" curbing. There is drive over curbing at the so that trucks can be positioned within containment during loading/unloading. The approximate containment capacity of the return/fill shelter is 1,013 gallons, as shown in the calculations in Figure 9.3-2, found at the end of the application. One wet dumpster is positioned on the steel grated area that holds approximately 75-gallons of used parts washer solvent (though they are not intended for storage). Any spill that may occur on the concrete floor is directed by gravity into the sump. Any residual material remaining can be cleaned up with mops, wet/dry vacuums, or sorbent material, should a spill occur. Spilled used or clean parts washer solvent will be collected and placed into the wet dumpsters.

Doors in this area include two overhead roll-up doorways for trucks entering/exiting the Return/Fill Shelter on the north and south side, one personnel doorway on the east side of the grated area for employees entering/exiting the office area, one overhead doorway connecting the return/fill shelter and container storage area (warehouse). The floors of the office building and warehouse building are flush with the steel grated dock of the return/fill shelter (which is approximately 33 inches above the floor of the shelter). Therefore, spills originating on the steel grated area will be contained by the concrete floor and drive over curbing in the return/fill bays. Based on the capacity of the return/fill containment, it is extremely unlikely that a spill would escape the area. The return/fill shelter is covered by a fixed roof and areas directly outside the bays are asphalt covered, thus preventing direct contact with soils and ground water.

Tank Area

The permitted tank storage unit (secondary containment) (Figure 5.6-1) houses three above-ground storage tanks: one-RCRA-permitted Hazardous Waste Tank (Used Solvent), two Used Oil tanks under a vinyl enclosure. This unit is provided with over 15,000 gallons of secondary containment, which is in excess of the single largest tank (15,000 gallons). The containment area is not sloped. Tank loading/unloading connections are located within the containment system in the center of the north side of the tank farm. A drip pan is present under these connections. Any tank leaks or unloading spills will be controlled by the containment system, or the drip pan. This

material may be readily removed by pumping from the containment system, sump, or drip pan by wet vacuum or sorbent material. The permitted tank storage unit has a vinyl enclosure to prevent rainwater from entering the containment area. Should rain water enter the containment area it will be verified visually that no iridescent sheen exists before discharging to the ground outside. Only the Branch Manager or someone operating under his/her direct orders may discharge to the ground surface. If a spill has occurred from the used oil tanks, this material will be collected and pumped back into a used oil tank if the volume of the spill warrants. If it is a minor spill, it may just be cleaned up with absorbent material and placed into a branch generated container for disposal. A spill originated from the RCRA-Permitted Hazardous Waste Tank (Used Solvent) will be collected and pumped back into the tank if the volume warrants. Minor spills of this material may be cleaned up with absorbent material and placed into a branch generated container for disposal. If any rainwater exhibits an iridescent sheen indicating a mixture with solvent, then the rainwater will be pumped in to the used parts washer solvent tank via the wet dumpster at the return/fill shelter. Any spills which occur on the loading/unloading area will be cleaned up and the area decontaminated. Decontamination methods are discussed later in this Plan. This decontamination will result in de minimis residue.

Employee training emphasizes the importance of inspection, maintenance, personal safety, and reporting of conditions with pollution incident potential. This training, coupled with the Safety-Kleen's containment system and immediate cleanup of any spills, eliminates or greatly minimizes the chance of contamination of ground water and/or surface water in the vicinity of the site. In addition, surface run-off at the site does not come in contact with stored products in the waste management area.

DECONTAMINATION

Once the spilled material has been cleaned up, the spill area and equipment used during the spill clean-up must be decontaminated and/or disposed, as described below.

Concrete Surfaces/Containment Area

- Concrete surfaces/containment areas will be cleaned with a detergent solution and then rinsed with hot water. The rinsate will be collected via wet vacuums and placed in

containers. Visual inspection will be used to determine the success of the decontamination procedure.

- The intent of the surface decontamination is to prevent current or future releases of materials to the environment. Vigorous cleaning with detergent is sufficient to prevent releases to the environment during normal operations. Potential for hazards from residual materials to future occupants of the facility are addressed in the closure plans for the facility and the decontamination procedures incorporated therein.

Equipment

The equipment used to clean the area includes mops, pails, scrub brushes, and a wet/dry vacuum. Equipment which is considered reusable (i.e., pails, wet/dry vacuum, hoses) will be washed with detergent, and wash water and rinsate will be collected for proper disposal. All non-reusable equipment and/or equipment which is not capable of being decontaminated will be containerized and disposed of as hazardous waste. Equipment used in a response will be deemed fit for use after being used in any response.

Wash Water and Rinsate

If the rinsate or other wastes generated in the clean-up process is determined to be hazardous, it will be properly disposed of as a hazardous waste; otherwise, the material will be disposed of as an industrial waste. It should be noted that wash water and rinsate will not be allowed to drain to soil or surface waters.

EMERGENCY RESPONSE EQUIPMENT AND COMMUNICATION

Due to the small size of the facility, routine communication will be accomplished by voice communication. Emergency alarms are available at the return/fill shelter, office and the warehouse— these alarms can be activated manually and sound off in the office to indicate an emergency situation. High level alarms are available at the permitted tank storage unit. Telephones are used in case of a spill or fire emergency to summon assistance. Emergency numbers are posted by phones throughout the facility. Included with these phone numbers is the 24-hour Safety-Kleen spill response number. Figure 5.6-1 provides the locations of fire

extinguishers, first-aid kits, emergency eyewashes, alarms, and spill equipment. Other emergency response equipment (Table 5.6-1) is kept in a small storage area inside the warehouse. This equipment includes mops and buckets, soap, shovels, and spill sorbent pads. Rubber gloves, boots, pumps, and a wet/dry vacuum cleaner are stored in an emergency supply area near the container storage area. Descriptions and uses of the equipment are provided in Table 5.8-1. Adequate aisle space is provided in the container storage area for movement in an emergency situation. The City of Tallahassee supplies water for domestic use, decontamination, and fire-fighting. The water pressure supplied by the City of Tallahassee is sufficient for these purposes. The fire protection system was installed and certified by the installation contractor in accordance with applicable fire codes.

Pails, hoses, and detergents are the primary equipment that will be used for decontamination. The equipment available at the facility for emergency situations is adequate for most cases. Large or serious emergency situations will be remediated by local emergency response teams or special emergency response or cleanup contractors. The facility is constructed and operates in accordance with National Fire Protection Association (NFPA) standards and applicable local ordinances. Applicable health and safety standards are also observed at the facility.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment will be tested and maintained as necessary to assure its proper operation in time of emergency.

FIRE CONTROL PROCEDURES

In the event of a fire at the facility, the following activities will be executed.

Call the Fire Department (page iii). [Note: Center aisles are available in container storage areas to permit fire department personnel to pass with fire-fighting equipment.]

Act quickly with the fire extinguisher to put out the fire before it spreads.

Call the Police Department (page iii) to maintain traffic and on-lookers, and local hospital (page iii) to notify the type and extent of injuries, if any.

Ignitable Wastes

All wastes and products are kept away from ignition sources—Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., outside front of facility). The parts washer solvent and paint waste handling areas are separated from the office area to minimize the potential for a fire to spread or injury to personnel to occur.

The permitted tank storage unit is more than 20 feet from the property line as required in 40 CFR Part 264.198(b). Likewise, the flammable storage area is 50 feet or more from the property line per 40 CFR Part 264.176. Both of these distances meet the NFPA code for storage of ignitable materials.

Ignitable wastes are handled so that they do not:

1. Become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The parts washer solvents and paint wastes are stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented, and the containers kept at room temperature to minimize the potential for pressure build-up. The tanks are painted white to reflect sunlight and are vented to prevent pressure build-up.
2. Produce uncontrolled toxic mists, fumes, dusts, or gases in quantities sufficient to threaten human health--The vapor pressure of petroleum based parts washer solvent is low (2 mm-Hg) and it and the paint waste may react with strong oxidizers and reactive metals only. Toxic mists, fumes, and dusts do not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization is minimal under normal working conditions.

[Note: Dry-cleaning wastes are initially not flammable but may produce toxic gases and hydrochloric acid at elevated temperatures (about 1,200°F).]

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See "1" above and "4" below.

4. Damage the structural integrity of the Safety-Kleen facility--The parts washer solvent and paint wastes do not cause deterioration of the tank, drums, or other structural components of the facility.

Incompatible Wastes

Incompatible wastes are segregated in an appropriate manner in accordance with industry standards. All waste or products are kept away from ignition sources. Employees must confine smoking or open flames to designated safe areas (ONLY out in front of the facility).

Materials are handled so they do not:

- a. Generate extreme heat or pressure, fire or explosion, or violent reaction.
- b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health.
- c. Produce uncontrolled fires or gases in sufficient quantities to pose a risk of fire or explosion.
- d. Damage the structural integrity of the Safety-Kleen facility.

Adequate aisle space, at least 2 ft., is maintained to allow unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

External Emergency Factors

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel. Also, the container storage areas are in buildings which are inaccessible to unauthorized personnel.

1. Vandalism - Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in a previous section of this Plan.
2. Employee Strikes - A strike would not result in a solvent spill or fire.
3. Power Failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.

4. Flooding - The waste management facility elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.
5. Storms or Cold Weather - The solvent return/fill shelter, tank storage, and the container storage areas are roofed to eliminate the possibility of rain entering the waste management areas. Neither snow, cold weather, nor stormwater is expected to affect the facility.
6. Hurricanes – Safety-Kleen will adhere to the following procedures in the event of an approaching hurricane:

Hurricane Watch

- Compile a list of employees with telephone numbers. Give each a call-in number for the branch (Branch Manager cell phone or branch number) in the event operations are interrupted.
- Prepare battery-operated radio (if the facility has one) and other equipment in the case of power outage.
- Complete cleanup of facility property – all empty drums, containers, trash containers, chairs, spill kits, etc. should be brought inside the facility structure.
- Facility services should be restricted to local routes (no more than 30-45 minutes from the facility) in case weather conditions deteriorate.
- Ensure any areas which may be exposed to rainwater are clean and secure filling nozzles.
- Route trucks should be re-fueled prior to the storm, emptied of all wastes and product, secure lift gates and side compartments.
- Ensure all bulk collection trucks have off-loaded into the facility storage tank or Bulk Intermodal Distribution Services (BIDS) terminal.
- Move trucks inside building as possible and park the remaining trucks as close to the building as possible (preferably at the bay doors).
- Secure computers, monitors, etc. and wrap in plastic with tape.
- If possible schedule solvent tanker in a manner, which would allow the maximum volume of liquid to remain in the storage tanks as the structural integrity of a tank increases with content volume. Cam-lock all ends of hose fittings and turn off valves at the storage tanks.
- After all preparation has concluded, all employees should be sent home and the facility secured. Turn off main breaker.

Hurricane Warning

- All employees are excused from work if their county of residence is put under a hurricane warning. However, the branch manager or other key personnel may be available to perform some last minute activities if weather permits.
- Notification, via incident alert system or telephone, that a hurricane warning has been posted.
- Walk-around of facility to ensure all preparation work conducted under the hurricane watch has been completed.
- Completion of any remaining items that were not finished.

Following Hurricane

- Depending on the intensity of the storm, the following actions should be carried out as soon as conditions permit.
- Employees should phone-in, following local government employee guidelines, for returning to work.
- Branch manager and/or the emergency coordinator should be the first people to enter the facility. Perform a complete walk-around of the facility checking for security of premises, waste management areas, determine if there are any safety issues that pose risk for employees, inspect for any damage, looting, or theft and generate a list of items to report.

EVACUATION PLAN

In an uncontrolled emergency, all persons are to be evacuated from the area by means of a verbal cry, use of the public address system, or by sounding a car horn with 3 long bursts and are to assemble across the street from the entrance drive to the facility evacuation routes and the gathering point are noted on Figure 5.1-3 in this plan. A head count will be performed by the emergency coordinator at the gathering point to ensure all personnel, and any contractors or visitors are accounted for.

The Fire Department must be notified at the time of evacuation either from a safe onsite building or neighboring facilities. Clearly marked exits exist in warehouse and office area.

AVAILABILITY AND REVISION OF THE PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

This Plan and all revisions to the Plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed under the Preparedness and Prevention Plan, which may be called upon to provide emergency services. This Plan and all revisions to the Plan are made readily available to employees working at the facility.

This Plan is reviewed and updated, if necessary, whenever:

1. The facility permit is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
2. The list or location of emergency equipment changes;
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that:
 - a. Materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or
 - b. Changes in response necessary in an emergency.
4. The names, addresses, or phone numbers of emergency coordinators change;
5. The employee assigned to each emergency task changes, or
6. The plan fails when implemented in an emergency.

ARRANGEMENTS WITH LOCAL AUTHORITIES

Arrangements have been made to familiarize the Police Department, Fire Department, and local emergency response teams with the layout of the facility, properties of hazardous materials handled (Safety Data Sheets) at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes. The local fire department also conducts periodic fire inspections to ensure the Branch is in compliance, and this also gives the Department an opportunity to familiarize themselves with the layout of the facility in person.

Arrangements have been made to familiarize the local hospital with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which would result from fires, explosions, or releases at the facility.

Copies of this plan are submitted to the local authorities with proof of delivery. In addition, Safety-Kleen attempts to obtain e-mail addresses so that electronic copies may be delivered. These local authorities receive paper/electronic copies of any changes/revisions to this plan when there are made, including changes to facility emergency contacts. If no response is received from these local authorities, Safety-Kleen will follow up by contacting the specific authority by telephone.

Appendix A of this Plan (located at the end of this section) includes copies of example distribution letters for transmittal. Copies of updated transmittal letters are kept on file at the facility.

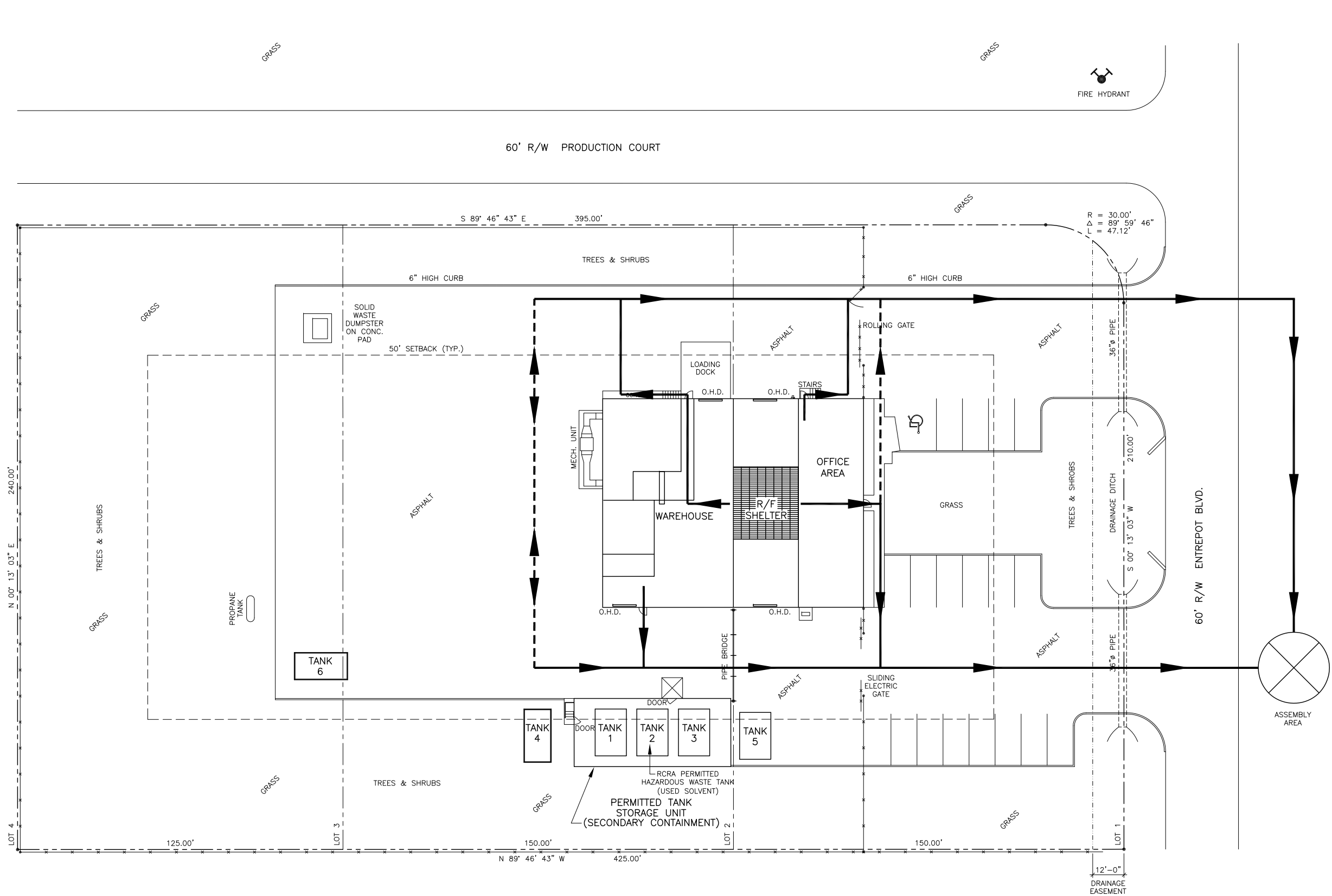


FIGURE 5.1-3

GENERAL NOTES

1. ALL TANKS ARE ABOVE GROUND STORAGE TANKS (AST'S).

LEGEND

- FENCING
- PROPERTY LINE
- O.H.D. OVERHEAD DOOR
- GRATING
- EVACUATION ROUTES
- ALTERNATE EVACUATION ROUTES

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	15,000 USG	USED OIL	HORIZONTAL TANK
2	15,000 USG	USED SOLVENT SPIRITS	RCRA PERMITTED HAZARDOUS WASTE HORIZONTAL TANK
3	15,000 USG	USED OIL	HORIZONTAL TANK
4	12,000 USG	CLEAN 150 SOLVENT	HORIZONTAL TANK ON CONCRETE PIERS
5	8,000 USG	USED ANTI FREEZE	HORIZONTAL TANK
6	7,000 USG	NON HAZ. VAC WASTE	HORIZONTAL TANK

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	NEW ISSUE FOR PERMIT	JEK	JC	JC	011623

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SITE EMERGENCY EVACUATION PLAN

4426 ENTREPOT BLVD.
TALLAHASSEE, FL. 32310

SAFETY-KLEEN SYSTEMS, INC.
42 LONGWATER DRIVE, NORWELL, MA. 02061
PHONE: 781-792-5000

SCALE 1"=20'-0"	BY JEK	CHKD JC	APPROVED JC	EHS	DATE 1/16/23
SERVICE CENTER LOCATION TALLAHASSEE, FL.			SC-DWG NUMBER 7094-SP00-001		REV. NO. A

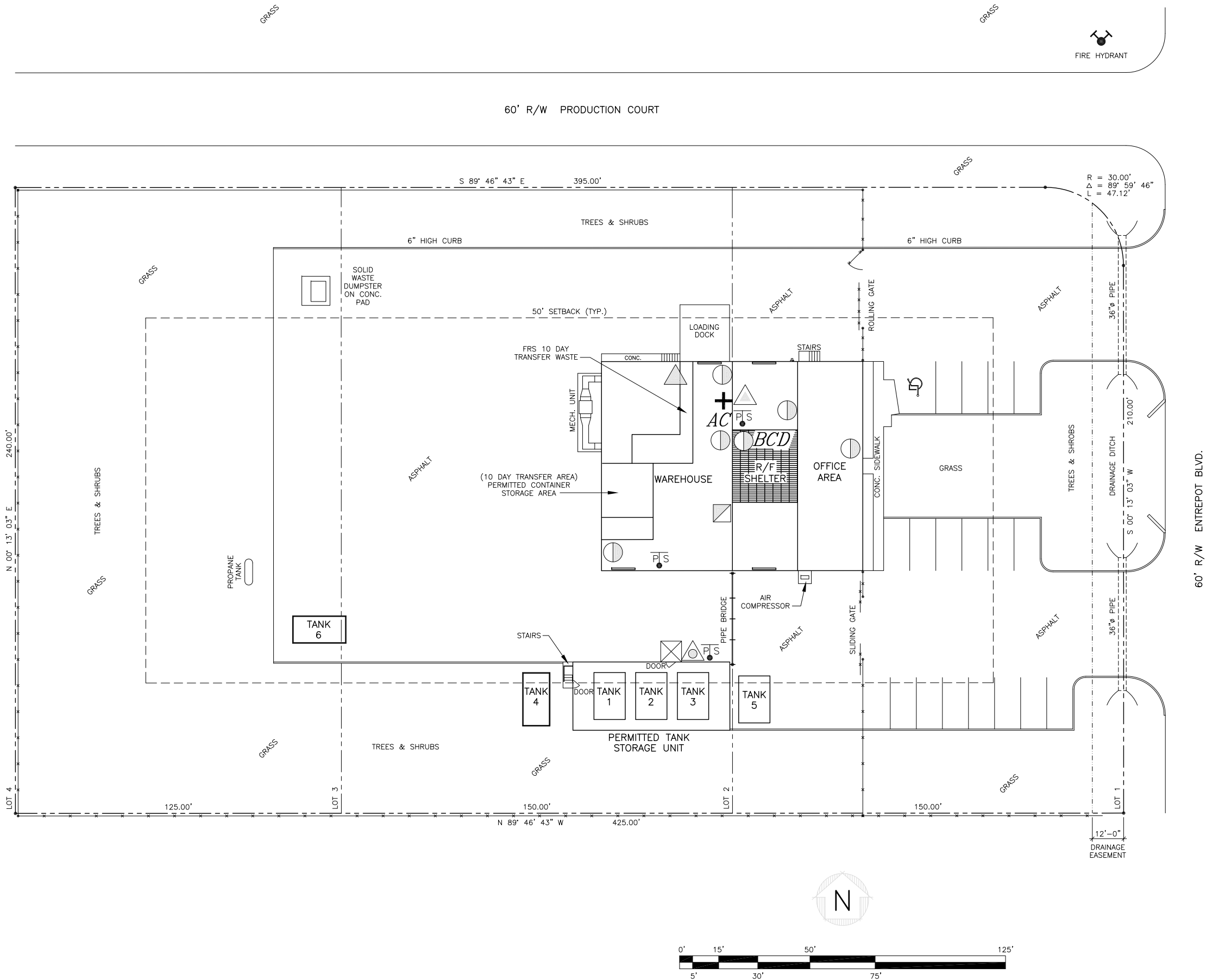


FIGURE 5.6-1

GENERAL NOTES

1. ALL TANKS ARE ABOVE GROUND STORAGE TANKS (AST'S).

LEGEND

- DRY CHEMICAL FIRE EXTINGUISHER – HAND HELD TYPE (10 # ABC)
- FIRST AID KIT
- SAFETY SHOWER W/ EYE WASH FOUNTAIN
- EYEWASH ONLY OR HANDSPRAY
- SAFETY SHOWER
- SPILL EQUIPMENT
- PULL STATION/EMERGENCY ALARM
- AC AEROSOL CAN SATELLITE ACCUMULATION
- BCD BRANCH CONTAMINATED DEBRIS SATELLITE ACCUMULATION
- FIRE HYDRANT 1,000–1,499 GPM
- FENCING
- PROPERTY BOUNDARY
- GRATING
- ROLL UP DOOR

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	15,000 USG	USED OIL	HORIZONTAL TANK
2	15,000 USG	USED SOLVENT SPIRITS	RCRA PERMITTED HAZARDOUS WASTE HORIZONTAL TANK
3	15,000 USG	USED OIL	HORIZONTAL TANK
4	12,000 USG	CLEAN 150 SOLVENT	HORIZONTAL TANK ON CONCRETE PIERS
5	8,000 USG	USED ANTI FREEZE	HORIZONTAL TANK
6	7,000 USG	NON HAZ. VAC WASTE	HORIZONTAL TANK

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	NEW ISSUE FOR PERMIT	JEK	JC	JC	011623

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TITLE
**SITE EMERGENCY
EQUIPMENT LOCATIONS**
4426 ENTREPOT BLVD.
TALLAHASSEE, FL. 32310

SAFETY-KLEEN SYSTEMS, INC.
42 LONGWATER DRIVE, NORWELL, MA. 02061
PHONE: 781-792-5000

SCALE 1"=20'-0"	BY JEK	CHKD JC	APPROVED JC	EHS	DATE 1/16/23
SERVICE CENTER LOCATION TALLAHASSEE, FL.			SC-DWG NUMBER 7094-SP00-005		REV. NO. A

TABLE 5.2-1
INSPECTION SCHEDULE

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Safety Equipment	Fire Extinguishers	Overdue inspection Inadequate charge Inaccessible	Weekly
	Eyewash	Disconnected/malfunctioning valves Pressure Inaccessible	Weekly
	First-Aid Kit	Inadequate inventory	Weekly
	Spill Cleanup Equip PPE Communication Devices	Inadequate supply Inadequate supply Equipment failures	Weekly Weekly Weekly
Security Equipment	Gates and Locks	Sticking, corrosion, lack of warning signs	Weekly
	Fence	Broken ties, corrosion, holes	Weekly
Storage Tanks	Volume in Tank	Never more than 95% full	Daily
	Tank Exterior	Rusty, loose anchoring, grounding, wet spots, leaks, discoloration	Daily
	High Level Alarms Volume Gauges	Malfunctioning siren/light Disconnected/ sticking, condensation	Daily Daily
Secondary Containment	Bottom and Walls	Cracks, debris, ponding, wet spots, stains, deterioration, displacement, leaks	Daily
	Rigid Piping and Supports	Distortion, corrosion, paint failures, leaks	Daily
Transfer Pumps and Hoses	Pump Seals	Leaks	Daily
	Motors	Overheating	Daily
	Fittings	Leaks	Daily
	Valves	Leaks, sticking	Daily
	Hose Connections and Fittings	Cracks, loose, leaks	Daily
	Hose Body	Crushed, cracked, thin spots, leaks	Daily

**TABLE 5.2-1
INSPECTION SCHEDULE**

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Return/Fill Shelter	Wet Dumpster	Excess sediment build-up, leaks, rust, split seams, distortion, deterioration, excess debris	Daily
Container Storage Area	Total Volume in Storage Condition of Drums	Exceeds permitted limit Missing or loose lids, labels missing, incomplete or incorrect, rust, leaks, distortion	Daily Daily
	Stacking/Placement/Aisle Space	Containers not on pallets, unstable stacks, inadequate aisle space	Daily
Secondary Containment	Curbing, Floor and Sump	Ponding/wet spots, deterioration, displacement, leaks, other	Daily

TABLE 5.6-1
EMERGENCY RESPONSE EQUIPMENT

Description	Type/Capacity	Location	Quantity
Fire Extinguisher	ABC (10 lb)	Office	1
		Warehouse	3
		Return/Fill	2
		Tank Farm	0
Eyewash/Shower	Fountain	Warehouse	1
		Return/Fill Area	1
		Tank Farm	1
First-Aid	OSHA Compliant	Warehouse	1
Telephones	Standard	Office	Min. 6
Telephones	Standard	Warehouse	1
Intercom	Explosion Proof	All Buildings	N/A
Gloves	Rubber	Emergency Equip Area	Min. 3
Boot covers	Rubber	Emergency Equip Area	Min. 3
Protective Clothing	Apron	Emergency Equip Area	Min. 2
Eye Protection	Goggles/Safety Glasses	Emergency Equip Area	Min. 3
Sorbent Material	Oil Absorbing	Emergency Equip Area	Min. 1 bag
Shovel	Standard	Emergency Equip Area	Min. 1
Mop and Bucket	Standard	Emergency Equip Area	Min. 1
Mercury Spill Kit	Standard	Warehouse-Emergency Equip Area	Min. 1
Respirator	Air Purifiers	Emergency Equip Area	Min. 2
Pump	Hand-held, Electric	Return/Fill Area	Min. 1
Wet/Dry Vacuum	Portable, Electric	Emergency Equip Area	1
Empty Drums for Overpack	30, 55, 85 gal.	Container Storage Area	4
High Level Alarms	Automatic	Tank Farm	1

TABLE 5.8-1

DESCRIPTION AND USES OF EMERGENCY EQUIPMENT

Item	Location	Use/Description
Gloves	Warehouse cage/Emergency Equipment Area	To be used when handling the solvents and chemical containers.
Safety Glasses or Face Mask	Warehouse cage/Emergency Equipment Area	To be worn when loading or unloading solvent.
Plastic Aprons	Warehouse cage/Emergency Equipment Area	For situations where a solvent may get on the workers clothing.
Eyewash Stand	Container storage area /area/tank farm	The workers should operate the stand and Become familiar with its operation
Showers	Return/fill/container storage area	These are used for emergency exposure situations.
Fire Extinguisher	Office/Return Fill/Warehouse/Tank Farm	An ABC extinguisher is a universal system used on paper, wood, and electrical, as well as solvent fires. The extinguishers must be full and carry an inspection tag.
Absorbent Material	Loading/Unloading Area/Warehouse	An adequate supply will be on hand to handle small spills. A 50 lb bag will also be kept in the warehouse to remediate and prevent spread of large spills
Mercury Spill Kit	Warehouse/Emergency Equipment Area	To be used in case of a spill/release from mercury devices or mercury containing bulbs
Portable Pumps Wet/Dry Vac	Warehouse	For use in picking up liquid spills in the container containment area, or other paved areas, and transfer materials associated with spills
Recovery Containers	Warehouse	Emergency storage of spilled product, cleaning fluids, or other materials associated with spills
Plastic	Warehouse	Used for containment of decontamination zones
Duct Tape	Warehouse	Taping of protective clothing, plastic, and other uses
First-aid	Office/Warehouse	Minor first-aid needs and health problems
Shovels/Mops	Warehouse	Used to collect spills and residue
Communication Equip	Facility Wide	Phones with intercom systems in office/warehouse for internal and external communications
Decon. Equip.	Warehouse	2 brushes, box of detergent, rags, available for decon of clean up equip.
High-level Alarm	Tank Farm	Automatic alarm that will sound in the event tanks reach a certain level in order to prevent over-filling



CO Safety Security Inspection

Form Code: 29

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Safety Security Inspection Instructions	
Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.	
CO Safety Security Inspection Items	
Perimeter fences - check for evidence of failure (e.g., broken ties, corrosion, holes, distortion, other)	
Gates/External Warehouse Doors - Check for evidence of failure (e.g., locking mechanism, broken ties, corrosion, holes, distortion, direct access doors working properly, other).	
Warning signs - check for evidence of failure (e.g. missing, faded, other).	
Exit Signs - Check for evidence of failure (e.g., missing sign, illumination, lamp bulbs, battery backup, other).	
Exits/Firelanes/Evacuation Routes - Check that all routes are clear or unobstructed.	
Lighting System - Check for evidence of failure (e.g. expired lamps, effectiveness, location, other).	
Emergency Lighting System - Check for evidence of failure (e.g., expired lamps, battery backup, effectiveness, other).	
Accessibility of Safety Equipment/Protective Gear - Check for evidence of availability (e.g.,	

hardhats, faceshields, goggles, safety glasses, boots, gloves, aprons, uniforms, duct tape, absorbents, other).	
Adequate Supply of Safety Equipment/Protective Gear - Check for evidence of availability (e.g., cleanliness, inventory available is adequate, in the correct location, correct type of equipment, other).	
Condition of Safety Equipment - Check for evidence of failure (e.g., review PPE for damage or excessive wear, other).	
Breathing Apparatus Accessibility - Check for evidence of availability (e.g. SCBA respirators, equipment, other).	
Breathing Apparatus Adequate Supply/Full Charge - Check for evidence of availability (e.g., SCBA tanks, charged, other).	
Breathing Apparatus Condition - Check for evidence of failure (e.g., SCBA damage, other).	
First Aid Kits - Check for evidence of availability (e.g., adequate inventory, correct location, other).	
Bloodborne Pathogen Kits - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Emergency Eyewashes - Check for evidence of failure (e.g., disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, correct location, adequate type and inventory, other).	
Emergency Showers - Check for evidence of failure (e.g., disconnected or malfunctioning valves, inadequate pressure, inaccessible, leaking, correct location, adequate type, adequate inventory, other).	
Internal/External Communication - Check for evidence of failure (e.g., inadequate supply of phones or radios, malfunctioning intercom,	

telephones not working properly, emergency alarm does not work, phone moved from proper location, other).	
Fire Extinguishers - Check for evidence of failure (e.g., overdue inspection, correct location, correct type, not charged, inaccessible, adequate inventory, other).	
Absorbent Supply - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Recovery Drum Supply - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Respirators and Cartridges - Check for evidence of availability (e.g., adequate APR inventory, correct location, correct type, other).	
Fire Suppression System Accessibility - Check for evidence of failure (e.g., monitors, pull stations, alarms, other).	
Fire Suppression System Operable - Check for evidence of failure (e.g., test, other).	
Water Lines/Hydrants - Check for evidence of failure (e.g., blocked, broken, other).	
Alarm Systems - Check for evidence of failure (e.g., test, other).	
Fire Blankets - Check for evidence of availability (e.g., adequate inventory, correct location, other).	
Strainer on Fire Suppression System - Check for evidence of failure (e.g., functioning as intended, other).	
Surveillance System/Guard Service - Check for evidence of failure (e.g., equipment or service provided and functioning properly, other).	
Supplied Air Delivery System and Reserve - Check for evidence of failure (e.g., system operational, equipment functioning, other).	

Decontamination Equipment/Spill Clean-up Equipment - Check for evidence of availability (e.g., adequate supply of shovels, mops, cleaning solvents, available inventory, correct location, correct type, other).	
Portable Sump Pumps - Check for evidence of availability (e.g., adequate inventory, functioning properly, correct location, correct type, other).	
Gasoline Pumps - Check for evidence of failure (e.g., broken parts, leaks, other).	
Loud Speakers - Check for evidence of failure (e.g., test, other).	
Chocked Wheels on Parked Vehicles - Check for evidence of failure (e.g., chocks not used, missing, deteriorated, other).	
Cylinders Secure - Check for evidence of failure (e.g., properly stored, secured, chained, other).	
Ventilation Operable - Check for evidence of failure (e.g., system working as intended, other).	
Fall Protection - Check for evidence of availability (e.g., adequate inventory, integrity of equipment, other).	
Electrical Boxes - Check for evidence of failure (e.g., closed, not blocked, marked properly, other).	
Emergency Contact Info Posted - Check for evidence of availability (e.g., up-to-date postings, location requirement, other).	
Hearing Protection Available - Check for evidence of availability (e.g., type appropriate per location, other).	
Housekeeping - Check for evidence of failure (e.g., blocked egress, proper storage, procedure followed, other).	
Portable Compressor - Check for evidence of availability (e.g., adequate inventory,	

functioning properly, other).	
Lime Supply - Check for evidence of availability (e.g., adequate inventory, other).	
QC Lab Hood - Check for evidence of failure (e.g., functioning properly, other).	
Rolloff Parking Area - Check for evidence of failure (e.g., housekeeping, staging, other).	
Dumpster/Outside Containers - Check for evidence of failure (e.g., housekeeping, condition, appropriate use and storage, other)	
Stormwater Collection System - Check for evidence of failure (e.g., functioning properly, damaged equipment, integrity, other).	
Rally Point - Check for evidence of failure (e.g., location identified, communication, other).	
Visitor Log - Check for evidence of failure (e.g., available, communication, proper use, other).	
Contingency Plan - Check for evidence of failure (e.g., available, up-to-date, communication, other).	
Wind Instrument/Wind Sock - Check for evidence of failure (e.g., operational, functioning properly, not broken, other).	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	

Appendix A

Example Letters to Local Authorities

(Date)

Certified Mail #

Tallahassee Police Department
234 East 7th Avenue
Tallahassee, FL 32302

RE: Safety-Kleen Systems, Inc., 4426 Entrepot Blvd., Tallahassee, Florida

Dear Sir/Madam:

Under terms of the Environmental Protection Agency (EPA) regulations 40 CFR 264, Subpart D, Safety-Kleen Systems, Inc. (SK) must provide local police, fire departments, hospitals, and state or local emergency response teams with a copy of the contingency plan for the above-referenced facility, and any revisions to the plan. A copy of the updated contingency plan is enclosed for your files. Please review this updated contingency plan.

EPA regulations 40 CFR 264, Subpart C, require that SK attempt to make arrangements for the provision of emergency assistance. Emergency assistance for this facility may be needed from the police and fire departments, state emergency response teams, and hospitals. The completion and return of the enclosed form will acknowledge receipt of this update to the contingency plan and provides your agreement to be available for emergency assistance.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit our facility, please contact me at (850) 576-9764.

Sincerely,

Branch Manager
Safety-Kleen – Tallahassee

Enclosures

(Date)

Tallahassee Police Department
234 East 7th Avenue
Tallahassee, FL 32302

Branch Manager
Safety-Kleen Systems, Inc.
4426 Entrepot Blvd.
Tallahassee, FL 32302

RE: Safety-Kleen Systems, Inc., 4426 Entrepot Blvd., Tallahassee, Florida

Dear Branch Manager:

This is to acknowledge that the Tallahassee Police Department has been made aware of the potential need for emergency assistance associated with the operation of the Safety-Kleen Systems, Inc. (SK) facility at 4426 Entrepot Blvd., Tallahassee, Florida. The Tallahassee Police Department understands that the emergency coordinator is available to provide additional information on the nature of assistance that may potentially be required, type of physical and chemical hazards that may potentially be encountered, and the type of injury or illness that may potentially occur.

This is to acknowledge receipt of the updated contingency plan information for the Tallahassee, Florida facility.

The Tallahassee Police Department _____ (agrees/declines) to be available to provide emergency assistance for the Safety-Kleen Systems, Inc. facility at 4426 Entrepot Blvd., Tallahassee, FL 32310.

Sincerely,

(Signature)

(Title)

(Date)

Certified Mail #

Tallahassee Fire Department
327 North Adams
Tallahassee, FL 32301

RE: Safety-Kleen Systems, Inc., 4426 Entrepot Blvd., Tallahassee, Florida

Dear Sir/Madam:

Under terms of Environmental Protection Agency (EPA) regulations 40 CFR 264, Subpart D, Safety-Kleen Systems, Inc. (SK) must provide local police, fire departments, hospitals, and state or local emergency response teams with a copy of the contingency plan for the above-referenced facility, and any revisions to the plan. A copy of the updated contingency plan is enclosed for your files. Please review this updated contingency plan.

EPA regulations 40 CFR 264, Subpart C, require that SK attempt to make arrangements for the provision of emergency assistance. Emergency assistance for this facility may be needed from the police and fire departments, state emergency response teams, and hospitals. The completion and return of the enclosed form will acknowledge receipt of this update to the contingency plan and provides your agreement to be available for emergency assistance.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit our facility, please contact me at (850) 576-9764.

Sincerely,

Branch Manager
Safety-Kleen – Tallahassee

Enclosures

(Date)

Tallahassee Fire Department
327 North Adams
Tallahassee, FL 32301

Branch Manager
Safety-Kleen Systems, Inc.
4426 Entrepot Blvd.
Tallahassee, FL 32310

RE: Safety-Kleen Systems, Inc., 4426 Entrepot Blvd., Tallahassee, Florida

Dear Branch Manager:

This is to acknowledge that the Tallahassee Fire Department has been made aware of the potential need for emergency assistance associated with the operation of the Safety-Kleen Systems, Inc. (SK) facility at 4426 Entrepot Blvd., Tallahassee, Florida. The Tallahassee Fire Department understands that the emergency coordinator is available to provide additional information on the nature of assistance that may potentially be required, type of physical and chemical hazards that may potentially be encountered, and the type of injury or illness that may potentially occur.

This is to acknowledge receipt of the updated contingency plan information for the Tallahassee, Florida facility.

The Tallahassee Fire Department _____ (agrees/declines) to be available to provide emergency assistance for the Safety-Kleen Systems, Inc. facility at 4426 Entrepot Blvd., Tallahassee, Florida 32310.

Sincerely,

(Signature)

(Title)

(Date)

Certified Mail #

Hospital Administrator
Tallahassee Memorial HealthCare
1300 Miccosukee Road
Tallahassee, FL 32308

RE: Safety-Kleen Systems, Inc., 4426 Entrepot Blvd., Tallahassee, Florida 32310

Dear Sir/Madam:

Under terms of Environmental Protection Agency (EPA) regulations 40 CFR 264, Subpart D, Safety-Kleen Systems, Inc. (SK) must provide local police, fire departments, hospitals, and state or local emergency response teams with a copy of the contingency plan for the above-referenced facility, and any revisions to the plan. A copy of the updated contingency plan is enclosed for your files. Please review this updated contingency plan.

EPA regulations 40 CFR 264, subpart C, require that SK attempt to make arrangements for the provision of emergency assistance. Emergency assistance for this facility may be needed from the police, fire departments, state emergency response teams, and hospitals. The completion and return of the enclosed form will acknowledge receipt of this update to the contingency plan and provides your agreement to be available for emergency assistance.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit our facility, please contact me at (850) 576-9764.

Sincerely,

Branch Manager
Safety-Kleen – Tallahassee

Enclosures

(Date)

Hospital Administrator
Tallahassee Memorial HealthCare
1300 Miccosukee Road
Tallahassee, FL 32308

Branch Manager
Safety-Kleen Systems, Inc.
4426 Entrepot Blvd.
Tallahassee, FL 32310

RE: Safety-Kleen Systems, Inc., 4426 Entrepot Blvd., Tallahassee, Florida 32310

Dear Branch Manager:

This is to acknowledge that the Hospital Administrator, Tallahassee Memorial HealthCare, has been made aware of the potential need for emergency assistance associated with the operation of the Safety-Kleen Systems, Inc. (SK) facility at 4426 Entrepot Blvd., Tallahassee, Florida 32310. The Hospital Administrator, Tallahassee Memorial HealthCare understands that the emergency coordinator is available to provide additional information on the nature of assistance that may potentially be required, type of physical and chemical hazards that may potentially be encountered, and the type of injury or illness that may potentially occur.

This is to acknowledge receipt of the updated contingency plan information for the Tallahassee, Florida facility.

The Hospital Administrator, Tallahassee Memorial HealthCare _____ (agrees/declines) to be available to provide emergency assistance for the Safety-Kleen Systems, Inc. facility at 4426 Entrepot Blvd., Tallahassee, Florida 32310.

Sincerely,

(Signature)

(Title)

Tab 4

Part II

Waste Analysis Plan

Part II

Waste Analysis Plan (WAP)

270.14(b)(3), 264.13(b)-(c)

Waste analysis at the Safety-Kleen Tallahassee Service Center is a three-step process that includes:

- Prescreening of customers
- Qualitative/visual analysis and
- Quantitative analysis (lab analysis)

Prescreening of Customers

Safety-Kleen performs a customer prescreening for all parts washer and immersion cleaner service customers. The other permitted waste streams (dry cleaning wastes and paint wastes) are generated from facilities where there is typically one process generating hazardous waste and the possibility of cross-contamination from other chemicals or wastes is minimal. Immersion cleaner (IC), dry cleaner, and paint wastes remain in the container they were originally packaged from the time they are collected at the customer location, while in storage at the SK Tallahassee Branch, and until received at a permitted Safety-Kleen/Clean Harbors TSDF, or other properly permitted disposal facility. These waste containers remain closed from the time they leave the customer to final disposition.

Prior to leasing a SK parts cleaning machine or placing a Customer Owned Machine (COM) service, the customer's business is reviewed. Where the possibility exists for contamination of the parts cleaner solvent (e.g., pesticide, herbicide, or pharmaceutical operations), operations are reviewed to ensure that the solvent is protected from the sources of contamination. In reviewing a customer's business, the Safety-Kleen representative provides customers with written and verbal information on use of the equipment. When a new service is placed with a new, or existing customer, the customer must agree to certify that they "will not introduce any substance into the parts washer solvent or aqueous cleaning solution, including without limitation any hazardous waste or hazardous waste constituent, except to the extent such introduction is incidental to the normal use of the machine". The customer further agrees that they will not clean parts/paint guns that have been contaminated with or otherwise introduce PCBs, herbicides, pesticides, dioxins, or listed hazardous wastes into the parts washer solvent or aqueous cleaning solution or said waste would not be accepted by Safety-Kleen as a core waste. In addition, the Safety-Kleen machine label provides operating and safety information which includes a statement that the addition of any other chemical or cleaner to the parts washer solvent is prohibited.

Information supplied and/or verbally communicated to the customer will contain at a minimum:

- Proper usage and management of the unit
- Information on the reasons to not add materials to the unit, and
- Examples of what not to add to the unit

Qualitative/Visual Analysis

Safety-Kleen conducts qualitative/visual analysis as a part of all parts washer and immersion cleaner (IC) wastes at the time of service. Qualitative/visual analysis is conducted again on parts washer waste when returned to the facility and bulked into the storage tank. Qualitative/visual analysis is not conducted on the dry-cleaning and paint waste streams as these containers are not opened by the Safety-Kleen service representative and the likelihood of contamination is remote. Safety-Kleen representatives are instructed to visually examine the used solvent (parts washer and immersion cleaner) for each waste pickup when the machines are serviced, noting the quantity, odor, and appearance of the material recovered as follows:

1. The quantity of used parts washer solvent in the drum. Safety-Kleen knows the volumes of solvent provided for each parts washer model and customer owned machines. These clean volumes are listed on all Safety-Kleen service documents. When the amount of parts cleaner solvent or immersion cleaner fluid is more than 10% greater than originally supplied, the container will not be immediately accepted by the service representative. Contingent on the customer's responses to Safety-Kleen's inquiry regarding the customer's operation and handling practices, the solvent is accepted or left with the customer until analysis is completed to determine its acceptability.
2. The odor of the liquid in the container. Personnel must never make an effort to "sniff" the parts washer solvents. However, if in the normal course of servicing the parts washer machine, the odor of the fluid in the container is noticed to be different from that of parts washer solvent or immersion cleaner, the container will not be immediately accepted by the service representative. The SK representative will inquire with the customer regarding operation and handling practices of the parts washer machine and based on the response received from the customer the container will either be accepted or left with the customer until analysis is completed to determine its acceptability.

3. The appearance of the liquid in the drum. The color of Safety-Kleen's used parts washer solvent and spent immersion cleaner is well known. Clean parts washer solvent has a clear or greenish tint. The more it is used, the darker it becomes. The used parts washer solvents normally have a brown or black appearance. Therefore, if the used solvent does not appear to be green, brown or black the service representative shall reject the waste at the customer location and arrange for the material to be sampled for analysis. Certain contaminants containing dyes and color pigments (such as transmission fluid, soy-based printers' ink, and water-based paints) may change the color of used parts washer solvent to other colors. In these cases, if the service representative is not familiar with the customer's cleaning process he/she will inquire regarding the unusual color to determine the cause. If it is determined, after consultation with the customer, that the different color is due to cleaning materials with dyes or color pigments as described above, the used parts washer solvent would be acceptable.

Unused (clean) immersion cleaner is amber in color. As the solvent is used, the darker it becomes. Therefore, at the time of service, if the spent immersion cleaner does not appear to be amber, brown, or black, the service representative will not accept the container. A Safety-Kleen account manager will inquire with the customer regarding operation and handling practices of the material. Based on the response from the customer, Safety-Kleen will either accept the container, or require a representative sample be taken and sent for analysis.

If the material passes the three qualitative/visual analyses shown above the material is noted as having passed the field qualitative analysis on our service document (typically a handheld computer printout). As indicated in each of the qualitative/visual analyses, if the answers provided by the customer as to why the test (quantity, odor and appearance) were not acceptable, the material is left behind for further evaluation. An Account Manager will contact the customer to confirm the information provided to our service representative and offer to sample the material and send for analysis. Based on the results of their generator knowledge and/or analysis, the material may be managed as core waste or may be required to be managed as containerized transfer waste to another permitted designated facility.

At the Safety-Kleen Branch Service Center, a Safety-Kleen Representative or Material Handler again performs an additional qualitative/visual analysis on used parts washer solvent containers when they are received at the branch. Prior to emptying the used parts washer solvent into the wet dumpster, each container will be analyzed for: quantity/volume, odor, and appearance. Containers that fail this

qualitative/visual analysis at the branch will be held for further evaluation. An Account Manager will contact the generator to gather information on the waste and offer to sample the material and send for analysis. Based on the results of their generator knowledge and/or analysis, the material may be managed as core waste, managed as containerized transfer waste to another permitted designated facility, or may be returned to the generator.

As stated earlier, dry-cleaning and paint waste containers are not opened and inspected at the branch. Immersion cleaner (IC) waste containers are only opened at the customer/generator location and if acceptable, based upon the qualitative/visual analysis, are transported to Safety-Kleen Tallahassee where they remain unopened. IC waste containers are ultimately sent to another permitted designated facility for reclamation. Records of all sampled and/or rejected wastes will be kept on file or stored electronically at the Tallahassee branch.

In addition, receipt analysis is performed by the Safety-Kleen Recycle Centers on all inbound bulk solvent waste deliveries from the Branch Service Centers. Receipt analysis typically includes a screen for atypical flash point, Polychlorinated Biphenyls (PCBs), and halogenated organics.

Parameters for Requiring Additional Analysis and Rationale for Selection of Parameters

This section outlines the acceptance criteria used by Safety-Kleen representatives who pick up used parts washer and immersion cleaner solvents to be stored at the Tallahassee facility, as well as the protocols that will be utilized for associated sampling and analysis to support those acceptance procedures. The initial portion of this section presents a discussion of the rationale for the waste acceptance protocols and associated testing of each of these two permitted waste streams. The remaining portions of the section describe the parameters, test methods, sampling methods and frequency of analysis for the waste streams. The analytical methods used by Safety-Kleen in performing Tier 2 and Tier 3 analyses are cross-referenced in Tables 1 - 3. Safety-Kleen will utilize the methods contained in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods Compendium, U.S. EPA SW-846 (most current edition)*, and *ASTM analytical methods*. All sampling will be conducted following applicable Florida DEP SOP's such as FS 1000 General Sampling Procedures, FS 5000 Waste Sampling.

Rationale

The primary function of the acceptance protocol is to identify wastes that the facility is unable to manage (based upon the permit defined performance goals of the facility) before shipment of the waste is initiated

from the customer. The performance goals of the Tallahassee Branch define the tolerance limits for the wastes that can be accepted and form the basis for the acceptance and testing procedures outlined herein. Tolerance limits define the parameter boundaries that a waste must meet so that it can be managed in compliance with the facility's permit.

The facility manages waste for the purpose of storing and bulking (parts washer solvent) individual waste shipments from customers for subsequent off-site management. The performance goals of the facility can be summarized as follows:

- Waste needs to be compatible with the container it is shipped in;
- Waste that is bulked needs to be compatible with each other;
- Flammable waste must be maintained in areas that meet any applicable fire code regulations; and
- Any incompatible materials that are present must be segregated.

The acceptance criteria and associated testing have been designed to address characteristics of these waste streams being accepted by the Tallahassee facility that could potentially affect the performance goal of the facility (i.e., ensure the waste stream meets its tolerance limits). The acceptance criteria & associated testing protocols reflect the fact that various contaminants can be present within these waste streams. Specifically, the following should be noted:

- These contaminants are reflected within the regulatory classifications assigned to each of the waste streams;
- The presence of these contaminants does not affect how the wastes are handled by the facility; and
- The presence of these contaminants does not affect the performance goals of the Safety-Kleen Recycle Center receiving the waste, which by the nature of the recycling operations are more restrictive than those of the Branch facilities.

For instance, the introduction of a flammable material into a non-flammable waste could affect the flammability of the waste. Therefore, flash point is included as a test parameter to support the waste acceptance protocol for used parts washer solvent & spent immersion cleaner solvent that are rejected as part of the initial qualitative/visual inspection.

These waste streams are compatible with each other, and with the containers/tanks in which they are stored. Materials that may be commonly utilized by Safety-Kleen customers that could be incompatible with these

waste streams include strong oxidizers and chromic anhydride.

The Waste Analysis Plan entails the use of a tiered acceptance and testing approach for the used parts washer solvent & spent immersion cleaner waste streams. This tiered approach uses an initial tier (Tier 1) of qualitative/visual screening to determine if the waste meets certain acceptance criteria prior to being picked up. As stated earlier in the plan, this qualitative/visual analysis (Tier 1) inspection is performed by Safety-Kleen personnel at the customer's facility. Used parts washer solvent undergoes an additional Tier 1 qualitative/visual inspection at the branch once received. Any container of used parts washer solvent failing the Tier 1 criteria once received at the facility, will be subject to Tier 2 or Tier 3 testing.

Tier 2 and Tier 3 analytical criteria have been selected to ensure that the waste is what it is claimed to be and not contaminated with other wastes, based upon the normal manner in which these wastes are generated. The acceptance criteria is conservative and has been designed recognizing that the activities conducted by the Branch are an integral part of the storage and eventual recycling process, which is the basis of the services provided by Safety-Kleen.

Tier 2 analytical criteria will be employed when the waste does not meet the acceptance criteria established under Tier 1 and the decision has been made by Safety-Kleen that the waste will be rejected. If the waste fails any of the Tier 2 criteria, additional Tier 3 testing may be performed to further characterize the waste. Tier 3 testing is performed to determine quantitative levels of contamination where the Tier 1 and Tier 2 testing suggest that they may exceed acceptable levels. The results of testing conducted under the tiered approach will be maintained in the operating record at the Tallahassee facility.

Used Parts Washer Solvent Parameters, Test Methods and Rationale

Parameters, inspection & test methods, and acceptance criteria used to characterize used parts washer solvents are summarized in Table 1. Tier 1 testing includes the qualitative/visual analyses previously discussed.

Used parts washer solvent not meeting the Tier 1 acceptance criteria will be screened for Tier 2 criteria dependent on customer approval. Waste that does not meet the Tier 2 criteria will not be accepted by the facility unless the waste meets the Tier 3 criteria. Disposition of waste(s) which do not meet those criteria will be dependent upon customer approval. Safety-Kleen will offer to sample and send for additional analysis to determine the composition for acceptance. If laboratory results indicate that the material is

acceptable for other waste management methods, the material will be managed as a transfer waste by the facility. The customer may also choose to make alternative arrangements. Tier 2 protocol includes testing for flash point, specific gravity, pH and phase separation. Tier 3 protocol includes testing for volatile organic compounds and halogenated organic compounds.

Analyses have demonstrated that this waste stream will typically contain low concentrations of halogenated & non-halogenated volatile organic compounds. The low-level presence of these materials within the waste does not impair the facility's ability to properly manage it, except in those instances where flammable organics may significantly lower the flash point. Excessive contamination by halogenated or non-halogenated volatile organic compounds may also suggest improper use of the parts washer by the customer. In addition, the potential for impairing the Safety-Kleen Recycle Center's ability to manage such wastes may be affected. Tier 3 acceptance criteria for volatile organic compounds & halogenated volatile organic compounds have been established in consideration of these factors.

Used Parts Washer Solvent Sampling and Frequency

Tier 1:

Qualitative/visual analysis for color, volume, and any unusual odor is performed by a Safety-Kleen representative at the time of each parts washer service as previously stated in the WAP. If any of the Tier 1 criteria are not met, the SK representative will interview the customer in an attempt to determine the potential cause, and the container(s) will be left at the customer's location. An account manager will then contact the customer to review the Tier 2 testing criteria and request approval to proceed with the sampling/analyses. The customer may also elect to sample themselves and send for Tier 2 analyses. In either case the waste will remain with the customer until sufficient testing has been performed to pass Tier 2 or Tier 3 criteria.

Tier 2:

Used parts washer solvent will undergo Tier 2 testing if the waste does not meet Tier 1 acceptance criteria. Upon approval from the customer, a Safety-Kleen representative will collect a representative sample of the container contents using a Coliwasa sampling tube or other approved equipment to be sent for analyses. Tier 2 parameters include:

1. Flash point: The acceptable flash point range of 130 ° F to 160 ° F has been established for the used parts washer solvent collected from the customer, allowing for variations to occur from the normal use of the solvent. A flash point result outside of this range may indicate that significant amounts of

a flammable material may have been introduced or a significant amount of a non-combustible organic/aqueous-based material may have been introduced. Note: customer used parts washer solvent that is tested for flash point and the result is $< 140^{\circ}\text{F}$ will be required to add D001.

2. Specific gravity: The acceptable specific gravity range (0.70 to 1.1) has been established for the used parts washer solvent collected from the customer, allowing for variations to occur from normal use of the solvent. Specific gravity results outside acceptable range may indicate that significant amounts of a flammable material have been introduced (< 0.70) or a significant amount a halogenated solvent may have been introduced (> 1.1).
3. Phase separation & pH: Core sampling will be utilized to screen the waste for phase separation, and pH of any noticeable aqueous layer.

The results of Tier 2 testing will assist Safety-Kleen in assessing whether further testing (Tier 3) is necessary to accept the waste, or if the waste will be rejected for acceptance as Safety-Kleen permitted used parts washer solvent waste.

Tier 3:

The Tier 3 acceptance criteria have been established, recognizing that organic contaminants will normally be present in this waste stream.

Analyses of a sample for Tier 3 parameters will be dependent upon the results of the Tier 2 analyses. If the flash point result is lower than 130°F , volatile organic compound analysis will be performed. If the flash point result is higher than 160°F halogenated volatile organic compound analysis will be performed. In addition, if the specific gravity result is lower than 0.70, volatile organic compound analysis will be performed, and if specific gravity exceeds 1.1 halogenated organic compound analysis will be performed. If the sample fails any of the Tier 3 acceptance criteria, the container will not be accepted as a Safety-Kleen permitted used parts washer waste stream, though may be profiled and managed as a transfer waste to another designated facility.

Table 1 Summary of Test Methods and Acceptance Criteria of Used Parts Washer Solvent		
Analyses	Test Method	Acceptance Criteria
Tier 1 ¹		
Volume in Container	Visual inspection	Not greater than delivered amount
Color/appearance	Visual inspection	Green, clear; brown/black ²
Odor	Olfactory-during normal service	Characteristic mineral spirits odor ³
Tier 2		
Specific gravity	ASTM Method D5057	0.70 – 1.1
Flash point	EPA SW-846 1010	130 ° F - 160 ° F
Core sampling	Drum Thief or Coliwas	Phase separation
pH of aqueous layer	pH paper	4 – 9.5
Tier 3		
Halogenated organic compound	EPA SW-846 8121	< 10 percent total
Volatile organic compound	EPA SW-846 8260	< 10 percent total
¹ - Tier 1 acceptance criteria are utilized by Safety-Kleen when picking up each container of used parts washer solvent at a customer facility ² - Used parts washer solvent from printing companies may be a variety of colors due to inks used in their processes ³ - For health & safety reasons wastes are not deliberately “sniffed”. If an unusual odor is detected incidentally, this will be accounted for in the Tier 1 inspection		

Table 2 Tier 2 Results and Resulting Tier 3 Analyses Decision Diagram for Used Parts Washer Solvent	
Tier 2 Analytical Results	Subsequent Tier 3 Analysis
Flash Point	
< 130 ° degrees F	Volatile organic compounds
130 to 160 degrees F	Acceptable
> 160 degrees F	Halogenated organic compounds
Specific Gravity	
< 0.70	Volatile organic compounds
0.70 – 1.1	Acceptable
> 1.1	Halogenated organic compounds
Tier 3 Analytical Results	
Acceptable range volatile organic compounds	< 10 percent total
Acceptable range halogenated organic compounds	< 10 percent total

Spent Immersion Cleaner Parameters, Test Methods and Rationale

Parameters, inspection and test methods are summarized within Table 3. This protocol includes Tier 2 testing for flash point, and specific gravity. Tier 3 analyses will include volatile organic compounds and halogenated volatile organic compounds.

Analyses have demonstrated that this waste stream will typically contain volatile organic constituents, including chlorinated volatiles. The presence of these materials does not impair the facility's ability to properly manage them, except in those instances where flammable organics may significantly lower the flash point. In addition, excessive contamination from halogenated or non-halogenated organics may suggest the improper use of the immersion cleaner solvent machine by the customer. Tier 3 acceptance criteria for volatile organic compounds and halogenated organic compounds have been established in consideration of these factors.

Spent Immersion Cleaner Sampling Methods and Frequency

Tier 1:

Qualitative/visual analysis of every spent immersion cleaner container is performed by a Safety-Kleen representative for color, volume and unusual odor at the customer location each time service is conducted. For health & safety purposes, Safety-Kleen representatives are instructed not to purposely sniff the spent immersion cleaner. However, if unusual odors are noticed during the routine handling of these waste materials, this will be utilized as part of the waste acceptance criteria. If all Tier 1 criteria are met, the representative will accept the waste.

If any of the Tier 1 criteria are not met, the SK representative will interview the customer in an attempt to determine the potential cause, and the container(s) will be left at the customer's location. An account manager will then contact the customer to review the Tier 2 testing criteria and request approval to proceed with the sampling/analyses. The customer may also elect to sample themselves and send for Tier 2 analyses. In either case the waste will remain with the customer until sufficient testing has been performed to pass Tier 2 or Tier 3 criteria.

Tier 2:

Spent Immersion Cleaner solvent will undergo Tier 2 testing if the waste does not meet Tier 1 acceptance criteria. Upon approval from the customer, a Safety-Kleen representative will collect a representative

sample of the container contents using a Coliwasa sampling tube or other approved equipment to be sent for analyses.

Tier 2 parameters include:

1. Flash point: The acceptable flash point range of $> 140^{\circ}\text{F}$ has been established as the minimum result for the spent immersion cleaner solvent collected from the customer. A flash point below 140°F indicates that significant amounts of a flammable material may have been introduced.
2. Specific gravity: The acceptable specific gravity range (0.90 to 1.2) has been established for the spent immersion cleaner solvent collected from the customer, allowing for variations to occur from normal use of the solvent. Specific gravity results outside acceptable range may indicate that significant amounts of a flammable material may have been introduced (< 0.90) or a significant amount of heavy organics (e.g., chlorinated solvent) may have been introduced (> 1.2).
3. Phase separation & pH: Core sampling will be utilized to screen the waste for phase separation, and pH of any noticeable aqueous layer. If an aqueous layer is present, pH testing will be conducted.

The results of Tier 2 testing will assist Safety-Kleen in assessing whether further testing (Tier 3) is necessary to accept the waste, or if the waste should be rejected.

Tier 3:

The Tier 3 acceptance criteria have been established recognizing that significant amounts of organic materials can be found to the spent immersion cleaner solvent without affecting the facility's ability to properly manage the waste, or of the Recycle Center's ability to properly manage the waste stream.

Analysis of a sample for Tier 3 parameters will be dependent upon the results of the Tier 2 analysis. If any Tier 2 criteria are not met, the sample will be analyzed for the Tier 3 parameters. If the flash point is less than 140°F , volatile organic compound analysis will be conducted. If the specific gravity is lower than 0.90, volatile organic compound analysis will be conducted. If the specific gravity exceeds 1.2, halogenated organic volatile compound analysis will be conducted. If the sample fails any of the Tier 3 acceptance criteria, the container will not be accepted as a Safety-Kleen permitted spent immersion cleaner waste stream, though may be managed as a transfer waste to another designated facility.

Table 3 Summary of Test Methods and Acceptance Criteria for Spent Immersion Cleaner		
Analyses	Test Methods	Acceptance Criteria
Tier 1 ¹		
Volume in container	Visual Inspection	Not greater than amount delivered
Color/Appearance	Visual Inspection	Aber, brown to black
Odor	Olfactory-during normal service	Characteristic naptha odor ²
Tier 2		
Flash Point	EPA SW-846 1010	> 140 ° F
Specific gravity	ASTM Method D5057	0.90 – 1.2
Core sampling	Drum Thief or Coliwasa	Phase separation
pH of aqueous layer	pH paper	6 – 11.5
Tier 3		
Volatile organic compounds	EPA SW-846 8260	< 10% total contaminants foreign to product formulation; and/or not > 10% over any single component within product
Halogenated organic volatile compounds	EPA SW-846-8121	< 5% total
¹ - Tier 1 acceptance criteria are utilized by Safety-Kleen when picking up each container of spent immersion cleaner at customer's facility. ² - For health & safety reasons wastes are not to be sniffed deliberately. If unusual odors are detected incidentally, this information will be accounted for in the Tier 1 inspection.		

Quantitative Analysis (Lab Analysis)

After 50 years of servicing over 250,000 parts washer customers each year, Safety-Kleen has determined that the wastes generated by its customers are relatively homogeneous. The homogeneity of these wastes is evaluated annually through the Safety-Kleen Annual Recharacterization (AR) program (Quantitative Analysis).

Analytical data from the Annual Re-characterization sampling is subjected to an EPA SW846 approved statistical model (Exhibit C-1, found at the end of the WAP). The waste samples analyzed come from a variety of Safety-Kleen facilities across the country and is representative of the facility.

Samples included in the AR process are selected from random customers serviced by Safety-Kleen facilities. Randomness is overseen by the Safety-Kleen Technical Center, which manages the AR program, selecting the month that the samples will be taken. A list of waste streams included in the AR is found below. The analytical results or the AR are communicated to customers to assist them in making a waste determination, while they also consider their specific generation process. In the case of parts washer

solvent, if a customer determines specific waste codes apply to their used parts washer solvent then those codes will be used when servicing the parts washers. Generator services are typically scheduled months in advance and those clients whose waste is scheduled for pick-up the month selected by the Technical Center will be the wastes that are sampled.

The waste streams collected by Safety-Kleen are relatively uniform across business types and geographical locations. This is demonstrated by the minimal changes in the waste codes assigned to each stream through the AR statistical evaluation each year via the Non-parametric Upper Confidence Interval Approach. If waste code(s) are removed from any of the waste streams evaluated by the AR program, and SK has a current, or potential, customer generating this waste stream that they believe include the removed waste code(s), the customer may complete a separate waste profile based on process knowledge, or TCLP analytical data, and the waste may be managed as permitted or 10-day transfer waste.

When subjecting AR sample data to the Non-parametric Upper Confidence Interval Approach, the last 3 years of analytical data for a given waste stream is used from samples pulled from across the country. For example, statistically based waste codes assigned to a particular core waste stream in 2024 are based on samples analyzed in 2021, 2022, and 2023. Ideally 50 data points are used but at least 30 data points are required. If 30 data points are not available from samples pulled in 2021/2022/2023, samples from 2020 will also be incorporated into the population.

In reviewing with Dr. Gibbons how the number of data points was derived he wrote in an email ... *“This is a nonparametric upper confidence limit (see Gibbons, Bhaumik and Aryal, 2010 section 18.7) which is defined by an order statistic (i.e. a rank) of the data. There is nothing magical about 30 or 50, but 50 is good because the median is the average of the 25th and 26th highest values and the UCL is the 31st largest value, which provides a reasonably tight confidence limit (i.e. not an extreme value).”*

Homogeneity of the streams was further confirmed in 2004 when Safety-Kleen conducted an Annual Re-characterization using California-only customer data. Safety-Kleen conducted a statistical comparison of the ‘California only’ Annual Re-characterization result with the results from the National AR (Exhibit C-3, found at the end of the WAP). Note the conclusion that California customer wastes are no different than the streams generated by Safety-Kleen customers in the rest of the country.

The waste streams included in the Safety-Kleen AR process are by their nature consistent and predictable. The process includes streams generated by Safety-Kleen customers and terminated as permitted streams at Safety-Kleen facilities as well as streams generated by Safety-Kleen facilities.

Waste streams included in the Re-characterization process for 2023 (for 2024 waste codes) were:

CUSTOMER GENERATED

Immersion Cleaner
Parts Washer Solvent
Paint Gun Cleaner/Paint Wastes
Dry Cleaner (Perchloroethylene and Naphtha, filters,
bottoms and separator water)
Aqueous Brake Cleaner Solution
Aqueous Parts Washer Solution

SAFETY-KLEEN GENERATED

Bulk Solvent
Dumpster Sludge
Tank Bottoms

AR Sample Testing Protocol is located in Exhibit C-4, found at the end of the WAP. Procedures used for obtaining the samples are included in Exhibit C-5, found at the end of the WAP. Final AR Waste Code Assignments are included in Appendix B. A copy of Safety-Kleen's current Annual Re-characterization Data is included in Appendix B. All AR Samples are analyzed by an independent NELAP accredited environmental laboratory.

Waste Determination for Subpart AA, BB and CC Compliance

For purposes of waste determination, this facility utilizes knowledge of the wastes described in this section. The facility does not conduct distillation, fractionation, thin-film evaporation, solvent extraction, air stripping operations, or steam stripping operations. Therefore, Subpart AA regulations do not apply.

The used parts washer solvent managed in the tank system is presumed to contain hazardous waste with an organic concentration of at least 10-percent by weight, so Subpart BB regulations apply. For those hazardous wastes that are managed on a transfer basis, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that most waste solvents managed in tanks and containers at this facility may display an average volatile organic concentration of greater than 500 ppm at the point of waste origination. Therefore, no exemption allowed in 40 CFR 264.13(b)(8) from Subpart CC regulations is requested and hazardous wastes managed in tanks and containers at this facility shall be managed in accordance with applicable Subpart CC standards.

270.14(b)(3), 264.13(b)(1) *Parameters and Rationale*

Safety-Kleen's permitted waste streams which are all received in containers are broken into five types:

- Used parts washer solvent (petroleum naphtha/mineral spirits)
- Aqueous Parts Waste Solution
- Solvent immersion cleaner
- Paint waste
- Dry Cleaner – Perchloroethylene

The product provided, or in the case of dry cleaner solvents that are purchased by the generator, makes up the majority of the waste. As such the analytical testing includes the regulated constituents in these products and the regulated metals and volatile solvents that may come in contact with the products. This, combined with a known process that the waste streams are being derived from, form the basis for testing.

The purpose of the Re-characterization is to determine the waste codes applicable to core waste streams managed and generated by Safety-Kleen facilities. As such, a waste stream may be excluded from Re-characterization once it has consistently been designated as non-hazardous. A stream may also be excluded from Re-characterization when it has been determined that the codes assigned to the stream are stable and marginal changes in trace constituents will not affect the management of the stream. Lastly, a set of analytes may be omitted if they are not expected or are demonstrated to not be present in a waste stream. Pesticides and herbicides have never been included in the Re-characterization process as these constituents are not allowed in wastes picked up by Safety-Kleen. Analysis for semi-volatiles is in the process of being phased out as codes for semi-volatiles have never been assigned.

270.14(b)(3), 264.13(b)(2) *Test Methods*

Exhibit C-4, found at the end of the WAP, details the AR sample testing protocol.

270.14(b)(3), 264.13(b)(3) *Sampling Methods*

AR Sampling Method Requirements are outlined in Exhibit C-5, found at the end of the WAP.

270.14(b)(3), 264.13(b)(4) *Frequency of Analysis*

As described previously, a Qualitative/Visual analysis of the parts washer wastes managed at the Service Center is conducted for each waste pickup. Safety-Kleen's Re-characterization is conducted annually.

270.14(b)(3), 264.13(b)(5)(c) Additional Requirements for Wastes Generated Off-Site

Generators are informed of the results of the AR each year. No action is required by the generator if they agree to the waste code(s) for Safety-Kleen's core waste streams. However, if a generator chooses to use knowledge of its process to identify which waste codes are attached to the waste, approval by Safety-Kleen's Central Waste Profiling group is required. In most cases, laboratory analytical data will be required to remove codes determined by the AR process. If additional waste codes are identified by the generator, Safety-Kleen will set up a specific profile for that generators waste stream identifying those waste codes provided.

270.14(b)(3), 264.13(b)(6)(c), 264.17 Additional Requirements for Ignitable, Reactive or Incompatible Wastes

Waste received at the facility is analyzed according to the procedures described in the Waste Analysis Plan. All ignitable wastes terminated at the facility are compatible with each other and the containers in which they are stored. Therefore, additional analyses to evaluate compatibility are not necessary.

The permitted container storage area, located inside the warehouse, is where ignitable waste is stored are designed for this material. All electric components in the Return and Fill area are intrinsically safe. Hot work permits are required for any work that may involve excess heat, sparks or open flames in these storage areas and are conducted only when ignitable materials are not present. No Smoking signs are posted in all areas where ignitable waste is stored, and smoking is not allowed within the office, warehouse or fenced areas of the facility.

The only permitted hazardous waste containers opened at the facility are the used parts washer solvent wastes, which are eventually consolidated into the RCRA-Permitted Hazardous Waste Tank (Used Solvent) within the Permitted Tank Storage Unit. Used Parts Washer Solvent in this tank is considered ignitable. No other waste streams are added to the tank.

270.14(b)(3), 264.13, 268 Waste Analysis Requirements Pertaining to Land Disposal Restrictions

All of the permitted waste streams received and stored at the Tallahassee facility are treated or recycled at an approved Safety-Kleen/Clean Harbors TSDF, contract reclaimer, or other properly permitted facility.

The drum washer sediment generated at the facility is containerized and shipped offsite for disposal. The Branch Service Center does not dispose of any hazardous wastes onsite and does not send any permitted wastes to land disposal facilities. Therefore, the Tallahassee Service Center is not required to certify that

hazardous wastes that are restricted from land disposal are below treatment standards. The following sections discuss how Safety-Kleen determines appropriate Land Disposal Restriction (LDR) classification and treatment standards and how LDR notification requirements are met.

270.14(a), 264.13(a)(1), 268.1, 268.7, 268.9, 268.32-37, 268.41-43 *Waste Analysis*

Due to the nature of its business, Safety-Kleen receives wastes that are untreated and that are assumed to exceed the LDR treatment standards. For the Safety-Kleen parts washer solvent, immersion cleaner, dry cleaner wastes and paint wastes, the hazardous constituents are known. The rationale for the selection of LDR treatment standards are provided below.

270.14(a), 264.13(a)(1), 268.2(d), 268.2(f), 268.7, 268.30, 268.31 *Spent Solvent and Dioxin Containing Waste*

Safety-Kleen will manage F-solvent wastes. The spent dry cleaning perchloroethylene is F-Solvent non-wastewater waste with the following treatment standard: tetrachloroethylene (6.0 mg/kg). The perchloroethylene treatment standard for wastewaters is 0.056 mg/l. None of the permitted wastes Safety-Kleen handles contain dioxins.

270.14(a), 264.13(a)(1), 268.7, 268.32, 268.42(a) *California List Wastes*

California list wastes are a distinct category of RCRA hazardous wastes that are restricted under the land disposal restrictions (LDRs). These restrictions only apply to liquid wastes, with the exception of Halogenated Organic Compounds (HOCs), which may be liquid or non-liquid. In Safety-Kleen's case, all of our permitted waste streams are liquid, with the possible exception of the Dry-Cleaning Filters, which can be dry although they may have low levels of free liquids at times. In either case the California List Waste rules apply as the Perc Filters contain HOCs. The Safety-Kleen permitted waste streams do not contain PCBs over 50 ppm, free cyanides >1000 mg/l, nor do they have a pH of <2, so these categories do not apply.

Safety-Kleen permitted wastes are either recycled, fuel blended or incinerated. If any of the residues are landfilled, the prohibition levels for the California listed metals and HOC's will apply. Should liquid residues be landfilled they will have less than the metal prohibition limits prior to land disposal, and liquids and non-liquids will have less 1000 mg/kg of HOCs.

270.14(a), 264.13(a)(1), 268.7, 268.33-36, 268.41-43 *Listed Wastes*

Safety-Kleen does not handle non-solvent F-listed, K-listed, or P-listed waste in its' permitted areas. Any transfer waste having these codes will have the appropriate LDR paperwork accompany the manifest, so the designated facility can treat the material appropriately.

270.14(a), 264.13(a)(1), 268.7, 268.9, Part 268, Appendix I, IX *Characteristic Wastes*

Safety-Kleen may generate or store D001 wastes, including parts washer solvent. Since this waste contains high levels of organics, Safety-Kleen assumes that all D001 wastes will contain ≥ 10 percent total organic carbon (TOC). The technology-based standards for these non-wastewaters are "RORGs", (recovery of organics) or CMBST (high temperature organic destruction).

Safety-Kleen may also generate or store wastes that may be classified as D006, D007 (example: immersion cleaner, dry cleaner waste). The non-wastewater treatment standards for land disposal of these wastes are 0.11 mg/L TCLP, and 0.60 mg/L TCLP respectively. The wastewaters treatment standards for D006 (cadmium) and D007 (chromium) are 0.69 mg/l, and 2.77 mg/l respectively.

270.14(a), 268.3 *Dilution and Aggregation of Wastes*

Safety-Kleen's parts washer solvent is the only permitted waste consolidated at the site. All solvent is either recycled or destroyed via combustion; so, this section does not apply.

270.14(a), 264.13, 264.73, 268.7, 268.9(d) *Notification, Certification, and Recordkeeping Requirement*

For all waste streams terminated at this facility, in accordance with the regulations listed above Safety-Kleen will provide to the TSDFs, or authorized treatment/disposal facility, and require from its' regulated customers, notification/certification which provided the treatment standards for the wastes banned from landfills. These will be updated any time the waste should change, or the waste is delivered to a new final permitted site. A copy of this notification/certification shall be available (via electronic storage) at the Tallahassee facility.

270.14(a), 264.13, 268.7(a) *Notification, Certification, and Recordkeeping Requirement*

The notice is required paperwork for all Safety-Kleen permitted waste types. The notices and certifications provided by regulated customers must be reviewed for correctness and be kept on file (electronically) at the Service Center for at least three years as part of the operating record.

270.14(a), 264.13, 268.7(b) Notification and Certification Requirements for Treatment Facilities

This Safety-Kleen Tallahassee Branch is not a treatment facility; therefore, this section does not apply.

270.14(a), 264.13, 268.7(b) Notification and Certification for Land Disposal Facilities

The Safety-Kleen Tallahassee Branch is not a Land Disposal facility; therefore, this section does not apply.

270.14(a), 264.13, 268.7(a)-(b)(6) Waste Shipped to Subtitle C Facilities

All of Safety-Kleen Tallahassee Branch permitted wastes are shipped to a RCRA Subtitle C permitted facility.

270.14(a), 264.13, 268.7(d), 268.9(d) Waste Shipped to Subtitle D Facilities

None of Safety-Kleen Tallahassee permitted wastes are shipped to a Subtitle D facility. Therefore, this section does not apply.

270.14(a), 264.13, 268.7(b)(6) Recyclable Materials

Safety-Kleen Tallahassee permitted wastes are not shipped as recyclable materials used in a manner constituting disposal subject to the provisions of 40 CFR 266.20(b). Therefore, this section does not apply.

270.14(a), 264.13, 264.73, 268.7(a)(5)(6)(7)(d) Recordkeeping

Safety-Kleen Tallahassee does no recycling onsite. Therefore, this section does not apply.

270.14(a), 264.73, 268.50 Requirement Pertaining to Storage of Restricted Wastes

270.14(a), 264.73, 268.50(a)(2)(i) Restricted Waste Stored in Containers

270.14(a), 264.73, 268.50(a)(2)(ii) Restricted Waste Stored in Tanks

Safety-Kleen Tallahassee stores restricted wastes in the RCRA-Permitted Hazardous Waste Tank (Used Solvent), and in containers solely for accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal. Containers are marked with their contents and the accumulation start date. The hazardous waste tank is marked with its' contents and the waste movements are maintained in the operating record. The facility complies with the requirements in 40 CFR 262.34 and Part 264 as wastes are stored for no more than one year, typically much less.

270.14(a), 264.73, 268.50(f) *Storage of Liquid PCB Wastes*

Safety-Kleen Tallahassee does not store liquid PCB waste on site. Therefore, this section does not apply.

270.14(b)(21), 268.6 *Exemption from Prohibition*

Safety-Kleen Tallahassee does not seek an exemption to this prohibition. Therefore, this section does not apply.

270.14(a), 264.73, 268.7, 268.44 *Variance from a Treatment Standard*

Safety-Kleen Tallahassee does not seek an exemption to a treatment standard. Therefore, this section does not apply.

270.14(a), 264.13(b)(7), 268.4, 268.14 *Requirements for Surface Impoundments Exempted from Land Disposal Restrictions*

270.14(a), 268.13, 268.14 *Exemption for Newly Identified of Listed Wastes*

270.14(a), 264.13, 268.4(a)(1)(b) *Treatment of Wastes*

270.14(a), 264.13(b)(6), 268.4(a)(2)(i)(iv) *Sampling and Testing*

270.14(a), 264.13(b)(7)(iii), 268.4(a)(2)(ii) *Annual Removal of Wastes*

270.14(a), 264.13, 268.4(a)(3),(4)(b), 268.14 *Design Requirements*

Safety-Kleen Tallahassee does not have a surface impoundment. Therefore, these sections do not apply.

Exhibit C-1

Statistical Model (Dr. Gibbons)

Robert D. Gibbons, PhD

Blum-Riese Professor of Biostatistics
Committee on Quantitative Methods in Social, Behavioral and Health Sciences
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August 7, 2018

A Review of the Safety Kleen Statistical Waste Characterization Plan

In 1998, I prepared an annual statistical waste characterization plan for Safety Kleen based on a fully nonparametric approach to computing the 90% upper confidence limit for the 50th percentile of the distribution of analytic measurements. The motivation for the nonparametric approach was based on the non-normality of the distribution of analytic measurements observed at that time and even more importantly, the large proportion of measurements that did not detect the analyte in the sample; so called "non-detects." Motivation for this methodology was laid out in U.S. EPA SW846 (1986) and more recently in the U.S. EPA Unified Statistical Guidance Document (2009) see section 21.2. As noted in the Unified Guidance, "The advantage of a nonparametric interval around the median is its greater flexibility to define confidence intervals on non-normal data sets."

Recently, IL EPA has suggested that based on the OSWER 2002 Guidance, the nonparametric UCL that has been in use over the past 20 years should be replaced by the Chebyshev Inequality Method, which is a distribution free method. Using this method, the computed UCL for tetrachloroethylene (PCE) exceeded the regulatory standard whereas the nonparametric UCL did not. In the following, I try to shed light on this discrepancy.

To begin, nonparametric UCLs and distribution-free UCLs are in fact quite different. While neither method assumes a specific parametric form for the analyte distribution, the distribution free methods (e.g., Chebyshev Inequality Method) rely upon having a known population variance or standard deviation. Of course we never know the true standard deviation for the population, so practitioners typically substitute the observed standard deviation. As such, they are incorrect from the start. As noted in this guidance document, these distribution free methods break down when the detection frequency is low as is the case here. For PCE, only 8 of 31 measurements were detected (25.8%), and the largest measurement is an order of magnitude larger than the second largest measurement (51.72 vs. 5.8) suggesting the possibility that it is an outlier. As noted in the OSWER guidance, "If the proportion of non-detects is high (75%) or the number of samples is small ($n < 5$), no method will work well." This is true for the parametric or distribution free methods described in the document, but this is not true for the nonparametric methods (with $n > 20$) that have been used by Safety Kleen for the past 20 years. In fact, the nonparametric methods are based only on the rank ordering of the data and do not require either known or estimated values of the mean and variance as the distribution-free methods do and which break down in the presence of large numbers of non-detects and/or extreme skewness "As skewness increases further, the Chebyshev method is not recommended". The skewness of the PCE data produced by the large number of non-detects for which IEPA imputed DL/2 and the presence of a single extreme value is an example of extreme skewness. Non-detects and skewness have no effect on the nonparametric UCL used by Safety Kleen for the past 20 years and there are no distributional assumptions or summary statistics required to compute the UCL.

Sincerely yours,



Robert D. Gibbons Ph.D.

Statistical Analysis of Annual Waste Characterization Data

Prepared by
Robert D. Gibbons Ph.D.

for

Safety Kleen
July 23, 1998

1 Introduction

Since 1990, Safety-Kleen has undertaken a major analytical study each year to document the contaminants in some of its most common waste streams to determine which TCLP waste codes should appear on the manifest for that waste. This Annual Waste Recharacterization Program is both expensive and extensive. Upon review, it appeared that regulatory agency instructions for how to interpret the data might not have been in line with current policy, as reflected in SW846. The general approach is based on development of an upper 90% confidence limit¹ for the true concentration of each constituent, which can in turn be directly compared to regulatory standards to determine if the waste code should or should not be added to a particular waste stream (e.g., Premium Gold Parts Washer Solvent 150). The regulatory basis for this type of comparison stems from U.S. EPA SW846 Chapter 9 (September 1986) guidance on determining if a waste stream is hazardous.² The primary complicating feature is the presence of large numbers of nondetects which raises serious question regarding the use of the parametric approach. In light of this concern, nonparametric methods are used throughout.³ Specifically, following U.S. EPA SW846, we construct a nonparametric 90% upper confidence limit (UCL) for the 50th percentile of the distribution (i.e., median), which is equivalent to the 90% UCL for the mean in the case of a symmetric distribution such as the normal distribution.

¹"Consequently, the CI employed to evaluate solid wastes is, for all practical purposes, a 90% interval." U.S. EPA SW846 (1986) chapter 9 page 6.

²"The upper limit of the CI for μ is compared with the applicable regulatory threshold (RT) to determine if a solid waste contains the variable (chemical contaminant) of concern at a hazardous level. The contaminant of concern is not considered to be present in the waste at a hazardous level if the upper limit of the CI is less than the applicable RT. Otherwise the opposite conclusion is reached. "U.S. EPA SW846 (1986) chapter 9 page 3

³"If the data do not adequately follow the normal distribution even after logarithm transformation, a nonparametric confidence interval can be constructed. This interval is for the median concentration (which equals the mean if the distribution is symmetric)." U.S. EPA Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities, April 1989, page 6-8

2 Method

Following Chapter 9 of SW846, the 90% UCL for the mean concentration obtained from a series of n representative samples is to be compared to the appropriate regulatory standard to determine if the waste stream is hazardous. If the UCL exceeds the standard, the waste stream is considered hazardous. The applicant must compute the UCL that is appropriate for the specific distributional form of the data. Given the large number of nondetects for many of the constituents, it is difficult if not impossible to clearly identify the underlying distributional form of the data. In this case, the U.S. EPA guidance indicates that a nonparametric alternative should be used.⁴

Nonparametric confidence limits are derived as follows. Given an unknown $P \times 100$ th percentile of interest (e.g. the 50th percentile or median),⁵ where P is between 0 and 1, and n concentration measurements, the probability that any randomly selected concentration measurements being less than the $P \times 100$ th percentile is simply P and the probability of exceeding the $P \times 100$ th percentile is $1 - P$. In light of this, the number of sample values falling below the $P \times 100$ th percentile out of a set of n measurements follows a Binomial distribution with parameters n and P .

The connection with the Binomial distribution can be used to determine an interval formed by a given pair of order statistics (i.e. ranked values) that will contain the percentile of interest, in this case the 50th percentile. Similarly, the Binomial distribution can also be used in constructing an upper limit (i.e. one-sided) for the percentile (e.g. a 90% upper confidence limit for the 50th percentile of the distribution). The computational formula for the cumulative binomial distribution $B(x; n, p)$, representing the probability of getting x or fewer successes in n trials with success probability p is given by

$$Bin(x; n, p) \equiv \sum_{i=0}^x \binom{n}{i} p^i (1-p)^{n-i}$$

To draw inference regarding the $P = 50$ th percentile, we set $p = .5$ in the previous equation. For a one-sided UCL we compute

$$1 - \alpha = 1 - Bin(U - 1; n, .5)$$

beginning from the sample median. We then increase U by one until in this case $1 - \alpha$ is equal to at least .90. The smallest value of U that provides $1 - \alpha \geq .9$ is then the order statistic (i.e., ranked value) that is the nonparametric 90% UCL for the 50th percentile of the distribution.

⁴“If the data do not adequately follow the normal distribution even after logarithm transformation, a nonparametric confidence interval can be constructed.” U.S. EPA, 1989

⁵“This interval is for the median concentration (which equals the mean if the distribution is symmetric).” U.S. EPA (1989), page 6-8

3 Illustration

Consider the following most recent 50 data values for PCE (D039) obtained from Premium Gold Parts Washer Solvent-150.

Table 1
Premium Gold Parts Washer Solvent - 150
50 most recent samples in order of increasing concentration
in ppm

<50.000	<1.000	<0.100	<0.100	<0.100
<0.100	<0.100	<0.100	<0.100	<0.100
<0.100	0.110	0.200	0.200	0.220
0.230	0.260	0.510	0.870	0.880
1.000	1.300	1.500	1.800	2.000
2.700	2.700	3.300	5.400	7.000
7.100	12.000	12.300	17.200	19.700
20.000	20.000	21.200	23.600	32.300
51.100	52.500	136.000	211.000	286.000
508.000	635.000	771.000	940.000	2810.000

For $n=50$, $p=.5$ and $1 - \alpha = .9$, we find that $U = 31$ is the smallest order statistic that provides 90% confidence or more ($1 - \alpha = .941$). As such, we select the 31st largest value in Table 1 which is 7.1 ppm as our UCL. Since 7.1 ppm is larger than the standard of 0.7 ppm, then the D039 waste code is required for this waste stream.

4 Conclusion

The data in the following package have been interpreted using the methodology described. The waste codes for each stream were determined as those parameters for which the 90% UCL for the median concentration was above the regulatory limit, based on review of the last two years of samples or the most recent 50 samples, whichever yielded the larger number of samples to consider.

Exhibit C-3

California Annual Recharacterization Sampling Analysis

Statistical Comparison of Annual Recharacterization Data from California to the Rest of the Nation

Prepared by
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for
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1 Introduction

Since 1990, Safety-Kleen has undertaken a major analytical study each year to document the contaminants in some of its most common waste streams to determine which TCLP waste codes should appear on the manifest for that waste. This Annual Waste Recharacterization Program is both expensive and extensive. The general approach is based on development of an upper 90% confidence limit for the true concentration of each constituent, which can in turn be directly compared to regulatory standards to determine if the waste code should or should not be added to a particular waste stream (*e.g.*, Premium Gold Parts Washer Solvent 150). The regulatory basis for this type of comparison stems from U.S. EPA SW846 Chapter 9 (September 1986) guidance on determining if a waste stream is hazardous. As stated by U.S. EPA, "The upper limit of the CI for μ is compared with the applicable regulatory threshold (RT) to determine if a solid waste contains the variable (chemical contaminant) of concern at a hazardous level. The chemical contaminant of concern is not considered to be present in the waste at a hazardous level if the upper limit of the CI is less than the applicable RT. Otherwise the opposite conclusion is reached" (U.S. EPA SW846 (1986) chapter 9 page 3). The primary complicating feature is the presence of large numbers of nondetects which raises serious question regarding the use of the parametric approach. In light of this concern, nonparametric methods are used throughout this analysis. Again, as stated by U.S. EPA, "If the data do not adequately follow the normal distribution even after logarithm transformation, a nonparametric confidence interval can be constructed. This interval is for the median concentration (which equals the mean if the distribution is symmetric)" (U.S. EPA *Statisti-*

cal Analysis of Ground-Water Monitoring Data at RCRA Facilities, April 1989, page 6-8). Specifically, following U.S. EPA SW846, Safety Kleen constructs a nonparametric 90% upper confidence limit (UCL) for the 50th percentile of the distribution (*i.e.*, median), which is equivalent to the 90% UCL for the mean in the case of a symmetric distribution such as the normal distribution.

In review of this work, the State of California (DTSC/HML) has requested evidence that the data collected by Safety Kleen (SK) from California generators are representative of the data from the rest of the nation. Note that this involves a large number of statistical comparisons. There are as many as 11 waste streams and 33 constituents per waste stream (metals, volatile organics, semivolatile compounds, pH and flash point). In all, there are as many as $11 \times 33 = 363$ comparisons to be made. Using 95% confidence, there will be as many as $363 \times .05 = 18$ comparisons that are significantly different by chance alone. In the following sections, a statistical methodology is described that will detect real differences when they are present (*i.e.*, have a low false negative rate) and not identify differences that are consistent with chance expectations (*i.e.*, have a low false positive rate).

2 Method

To compare the California data to the rest of the nation, data from all states except California will be used to construct a statistical prediction interval for the mean (or median in the nonparametric case) concentration obtained from the California generator samples. If the actual mean concentration for the California samples is within the prediction interval, then we can conclude with 95% confidence that the California concentrations are consistent with the concentrations observed across the nation. By contrast, if the California mean concentration is outside of the prediction interval, then we can conclude with 95% confidence that the California samples contain concentrations that are either higher or lower than those found in the rest of the country (for a particular waste stream and constituent). A two-sided interval will be used to determine if additional waste codes should be added or if some waste codes should be deleted from the California list.

In the following sections, statistical details of normal, lognormal, and nonparametric forms of these prediction intervals are provided.

2.1 Normal Prediction Intervals for the Mean of m Future Measurements

In certain cases, we may be interested in comparing an average concentration from a small group to a much larger control population. For example, we may wish to compare the mean concentration for generators in California, to the concentration distribution for the rest of the country. One approach to solving this problem is to compute a normal prediction interval for the mean of m new samples, based on a background data set of n samples. For example, the m samples may be from all generators in California, and the n samples may be from a large number of generators across the nation (excluding California). The $(1 - \alpha)100$ percent normal prediction interval for a single future mean of m samples is:

$$\bar{x} \pm t_{[n-1, 1-\alpha/(2k)]} s \sqrt{1/m + 1/n}, \quad (1)$$

where t is an upper percentage point of Student's t -distribution on $n-1$ degrees of freedom, s is the standard deviation of the n background samples, \bar{x} is the mean of the n background samples, and k is the number of statistical comparisons being performed.

3 Lognormal Prediction Intervals for the Median of m Future Measurements

When the distribution of the n background measurements is shown to be lognormal, the $(1 - \alpha)100\%$ lognormal prediction interval for the median of the next m measurements is:

$$\exp \left(\bar{y} \pm t_{[n-1, 1-\alpha/(2k)]} s_y \sqrt{1/m + 1/n} \right). \quad (2)$$

where \bar{y} and s_y are the mean and standard deviation of the natural log transformed data. While in the normal case, the analogous prediction interval is for the mean, in the lognormal case, the exponentiated limit is for the median value.

4 Lognormal Prediction Intervals for the Mean of m Future Measurements

When the data are lognormally distributed and the comparison of interest is in reference to a future mean, we can use Land's coefficients to obtain an

approximate $(1 - \alpha)100\%$ lognormal prediction interval for the mean of m future measurements. The lower prediction limit is

$$\exp \left(\bar{y} + .5s_y^2 + H_{\alpha/(2k)}s_y\sqrt{\frac{1}{m} + \frac{1}{n}} \right), \quad (3)$$

and the upper prediction limit is

$$\exp \left(\bar{y} + .5s_y^2 + H_{1-\alpha/(2k)}s_y\sqrt{\frac{1}{m} + \frac{1}{n}} \right), \quad (4)$$

where H_α and $H_{1-\alpha}$ are factors for deriving lognormal confidence intervals given by Land (1971, 1975).

5 Nonparametric Prediction Intervals for the Median of m Future Measurements

In the nonparametric case, we can also construct a prediction interval for the median of m measurements based on a background of n samples. The idea is to identify a pair of upper and lower order statistics of the n background measurements that will provide $(1 - \alpha)100\%$ confidence of including the median California measurement. Note that for nonparametric intervals, the mean is not defined, so we must construct an interval for a future median. Fligner and Wolfe (1979), Guilbaud (1983) and Hahn and Meeker (1991) illustrate how the inverse hypergeometric distribution (Guenther, 1975) can be used to identify the appropriate order statistic of the n background measurements that will provide the desired level of confidence $1 - \alpha$, for given values of n and m . The inverse hypergeometric distribution is computed as the function

$$G(l, u, r, m, n) = \sum_{i=l}^u g(i, r + i, m, n) \quad (5)$$

where

$$g(i, r + i, m, n) = \frac{\binom{r-1}{i} \binom{n-r}{n-i}}{\binom{n}{m}} \quad (6)$$

and l is the lowest and u is the highest order statistic in the current interval, r is the median rank of the m new samples and n is the number of background measurements. To obtain a two-sided upper prediction limit (UPL), we iteratively solve for

$$G(l, u - 1, r, m, n) \geq 1 - \alpha/(2k), \quad (7)$$

for l and u .

6 Summary of Statistical Approach

In summary, depending on detection frequency, and distributional form, normal, lognormal, or nonparametric prediction intervals were computed to compare the mean(median) concentration in California for each waste stream, and for each monitored constituent to the national database (excluding California). For normal and lognormally distributed constituents, we constructed a prediction interval for a future mean. If distributional testing for the national database (excluding California) did not support normality or lognormality, or if the detection frequency was less than 50%, we computed a nonparametric prediction interval for a future median concentration. Given the large numbers of constituents, we adjusted the individual comparison false positive rate (for each waste stream) to provide an overall false positive rate of 5% (*i.e.*, 95% confidence) for each waste stream.

In those cases in which the actual mean(median) for the California data exceeded the UPL, a normal 90% upper confidence limit was computed for that waste, stream, and constituent, and that state-specific limit will be used to determine whether a specific waste-code should be associated with that waste stream in California.

7 Results

The previously described statistical methodology was applied to the following constituents:

Constituents used in the Analysis

<u>Constituent</u>
1,1-dichloroethylene
1,2-dichloroethane
1,4-dichlorobenzene
2,4,5-trichlorophenol
2,4,6-trichlorophenol
2,4-dinitrotoluene
2-methylphenol
Arsenic
Barium
Benzene
Cadmium
Carbon tetrachloride
Chlorobenzene
Chloroform
Chromium
Flash point
Hexachlorobenzene
Hexachlorobutadiene
Hexachloroethane
Lead
M+p-cresol
Mercury
Methyl ethyl ketone
Nitrobenzene
Pentachlorophenol
pH
Pyridine
Selenium
Silver
Tetrachloroethylene
Trichloroethylene
Vinyl chloride

in the following waste streams:

Waste Streams used in the Analysis

Waste Stream
Antifreeze
Auto Oil
Dry Cleaner Bottoms (DCB)
Aqueous Parts Washer (APW)
Immersion Cleaner
Industrial Oil
Paint Waste
Parts Washer Solvent (PWS) 105+150
Parts Washer Solvent 105R
Parts Washer Solvent 150
Parts Washer Solvent Sludge/Dumpster Mud (SDM)
Parts Washer Solvent Tank Bottoms (TB)

Overall, the majority of California data were consistent with the rest of the United States. 1,4DCB was less than the immersion cleaner LPL, whereas pH exceeded the UPL. For paint waste, TCE was less than the national LPL. For PWS 105+150, 1,4-DCB, 2-methylphenol, and benzene all exceeded the corresponding national UPLs. For PWS-SDM, pH exceeded the UPL. For PWS-TB, flash point was less than the national LPL.

For these waste streams and constituents, the California 90% normal UCLs (which can be used in place of the national values) were

Constituents used in the Analysis				
Waste Stream	Constituent	CA UCL in mg/L	Nat'l UCL in mg/L	Reg Limit in mg/L
Antifreeze	PCE	272	NA	0.7
Auto Oil	PCE	696	NA	0.7
Auto Oil	Benzene	21	NA	0.5
Immersion Cleaner	1,4-DCB	80	140	7.5
Immersion Cleaner	pH	10.5	10	2-12.5
Paint Waste	TCE	64	27.1	0.5
Parts Washer Solvent 105+150	1,4-DCB	.54	<2.0	7.5
Parts Washer Solvent 105+150	2-methylphenol	.44	1.8	200
Parts Washer Solvent 105+150	Benzene	8.7	2.2	0.5
Parts Washer Solvent SDM	pH	8.7	8.2	2-12.5
Parts Washer Solvent TB	Flash Point	Too Few (n=2)	145	140

These UCLs can be used in place of the national UCLs; however, I do not recommend use of the California UCLs for PCE in antifreeze and auto oil, because they are elevated due to a single outlying value. All analytical Tables are presented in the Appendices.

References

- [1] Fligner, M.A. and Wolfe, D.A. (1979). Nonparametric prediction limits for a future sample median. *Journal of the American Statistical Association*, **30**, 78-85.
- [2] Guenther, W.C. (1975). The inverse hypergeometric - a useful model. *Statistica Neerlandica*, **29**, 129-144. Note: A statistical foundational paper useful in deriving nonparametric prediction intervals.
- [3] Guilbaud, O. (1983). Nonparametric prediction intervals for sample medians in the general case. *Journal of the American Statistical Association*, **78**, 937-941.
- [4] Hahn, G.J. and Meeker, W.Q. (1991). *Statistical Intervals : A Guide for Practitioners*. Wiley, New York. Note: An excellent text on statistical prediction, tolerance, and confidence intervals.
- [5] Land, C.E. (1971), "Confidence intervals for linear functions of the normal mean and variance," *Ann. Math. Stat.*, **42**, 1187-1205.
- [6] Land, C.E. (1975) Tables of confidence limits for linear functions of the normal mean and variance. In, *Selected Tables in Mathematical Statistics*, Vol. III, American Mathematical Society, Providence R.I., pp 385-419.
- [7] Wilk, M.B., and Shapiro, S.S. (1968). The joint assessment of normality of several independent samples. *Technometrics*, **10**, no 4. 825-839.

Exhibit C-4

Sample Testing Protocol

Annual Re-Characterization Sample Testing Protocol

Spent Material	Test Parameters	Test Methods
Parts Washer Solvent	Flash Point by Pensky-Martens Closed Cup Tester	EPA SW846 1010
	pH	EPA SW846 9045
	Apparent Specific Gravity and Bulk Density of Waste	ASTM D5057
	TCLP Metals	EPA SW846 1311, 6010, 7470, 7471
	TCLP Semi-Volatiles	EPA SW846 1311, 8270
	TCLP Volatiles	EPA SW846 1311, 8260
Bottom Sediment from the Spent Parts Washer Solvent Tank and Return & Fill	Same As Above	
Immersion Cleaner	Same As Above	
Paint and Paint Gun Cleaner Waste	Same As Above	
Aqueous Brake Cleaner	Same As Above	
Dry Cleaner Waste	Same As Above	

Based on the process generating the waste streams outlined in the above table, 40 CFR 261.24 regulated herbicides and pesticides are not expected to be present; and are therefore, not included in the parameters tested under the Annual Re-Characterization Program.

Analysis is performed on a representative grab sample obtained from a single customer's waste container using a COLIWASA (Composite Liquid Waste Sampler) unless compositing is required by a facility-specific waste analysis plan.

Exhibit C-5

Sampling Procedures

Annual Re-characterization Sampling Instructions

Good sampling practices are critical to the success of the Annual Re-characterization program. Please take your time when pulling samples, ensuring that all of the following requirements are fulfilled.

Training Requirements and Supporting Documentation



- ✓ Personal Protective Equipment (PPE) – Follow requirements in attached PPE Matrix
- ✓ Prior to shipping samples by FedEx Air, you must complete the following:
 - IATA Dangerous Goods Regulations Training.
 - Sample shipping requirements are outlined in [BOG O310-005 \(US\)](#) and [OC310-005/OC310-005 FC \(Canada\)](#) and [Clean Harbors TC 8.0 Handling, Packaging, and Transporting Samples](#) policy

Supply Checklist

NOTE: To minimize opportunity for contamination, all AR sampling supplies are to be stored in facility office building until needed for actual sampling.

- ✓ Disposable COLIWASA (SK P/N 8941)
- ✓ Disposable plastic scoop
- ✓ Disposable plastic bucket if composite required (e.g., 6 gallon SK P/N 706)
- ✓ Sample Kits
 - SK P/N 3419 – Required for all dry cleaning related materials
 - SK P/N 82260 – Required for all other samples
- ✓ Housekeeping Supplies
 - PIG® Universal Heavy-Weight Mat
 - PIG® Heavy-Duty Maintenance Wipes
 - Plastic garbage bags
- ✓ Non sparking tools
- ✓ Grounding and bonding equipment
- ✓ Paperwork and Packaging Supplies
 - Chain of Custody form
 - Pen and Sharpie Marker
 - Packaging Tape

Pre-sampling Preparation

- ✓ Time – allow 15 minutes per sample
- ✓ **IMPORTANT** - [Make arrangements with warehouse workers/material handlers to set aside containers from different customers.](#) Each container sampled must be from a [different customer.](#)
- ✓ Place sample kit freezer packs in the freezer 24 hrs prior to sampling event.
- ✓ Purchase bags of ice to supplement the freezer packs if shipping samples in warmer weather
- ✓ Fill out Chain of Custody (COC) forms completely

How to fill out the Chain of Custody (COC) Form

1. Complete all fields in the COLLECTION INFORMATION section
2. **IMPORTANT** - Both the Customer Name(s) and Customer Number(s) associated with the container(s) being sampled must be documented on the COC.

In the event the analytical report shows atypical waste codes, we'll be able to track the sample back to the generator to discuss their specific process and possible source for contamination. Decision will need to be made regarding whether or not the generator's waste should remain as CORE, or is better handled through CWS.

3. A unique identification number must be assigned to each sample using the format **AR2017_89DH**
ID_sample description (e.g., AR2017_77WIB_Premium Solvent, etc.).
4. The same number must be written on the associated sample jar custody label so that the lab can match-up paperwork with samples upon receipt.
5. The sample collector must sign the RELINQUISHED BY section and enter the date and time of shipment.
6. Enter the air bill number on the COC form and make a copy of the form for your records.

Sampling

The majority of facilities' WAPs require "grab samples". A select few, however, require composite samples. See section below on how to obtain a composite sample.

The following table summarizes how samples are typically taken. Keep in mind, the waste streams required for sampling are permit specific (i.e., not every facility will be required to sample every stream outlined in the below table).

- Sampling Methods/Practices to be used
 - ASTM D5495 - *Standard Practice for Sampling with a Composite Liquid Waste Sampler (COLIWASA)*
 - ASTM D5633 - *Standard Practice for Sampling with a Scoop*

Sample Type	Sampling Location	Sample Size/Kit	Homogenization Technique	Sampling Device
Aqueous Brake Cleaner	5 gallon poly carboy	1 quart TCLP kit	Grab sample using multiple COLIWASA pulls or pour contents into a new bucket Stir/mix contents before sampling.	COLIWASA
Dry Cleaner Naphtha/PERC Bottoms/Filters	Drum	1 quart DOT SP-9168 Exemption Packaging	Grab sample Stir/mix content of drum with COLIWASA before sampling	COLIWASA or Scoop
Immersion Cleaner	Drum	1 quart TCLP kit	Grab sample Stir/mix content of drum with COLIWASA before sampling	COLIWASA
Paint Gun Cleaner Paint Waste	Drum	1 quart TCLP kit	Grab sample Stir/mix content of drum with COLIWASA before sampling	COLIWASA
Parts Washer Solvent Bulk Tank	Tank	1 quart TCLP kit	Grab sample	Tank valve or from tanker using a COLIWASA during annual draw down
Dumpster Sludge (APW and PWS)	Return and Fill	1 quart TCLP kit	Grab sample Stir/mix up Return and Fill bottoms with scoop before sampling	Scoop

Sample Type	Sampling Location	Sample Size/Kit	Homogenization Technique	Sampling Device
Tank Bottoms (APW and PWS)	Tank	1 quart TCLP kit	Grab sample during tank clean out Stir/mix up tank bottoms with scoop before sampling	Scoop
PWS 105	Drum	1 quart TCLP kit	Grab sample Stir/mix content of drum with COLIWASA before sampling	COLIWASA
PWS Premium	Drum	1 quart TCLP kit	Grab sample Stir/mix content of drum with COLIWASA before sampling	COLIWASA
APW	Drum	1 quart TCLP kit	Grab sample Stir/mix content of drum with COLIWASA before sampling	COLIWASA
Antifreeze	Drum	1 quart TCLP kit	Grab sample Stir/mix content of drum with COLIWASA before sampling	COLIWASA
Used Oil	Drum	1 quart TCLP kit	Grab sample Stir/mix content of drum with COLIWASA before sampling	COLIWASA

1. Bring all items in the *Equipment Checklist*, including frozen sample kit freezer packs/ice, with you to the sampling location.
2. Wear required PPE
3. Obtain a representative sample using a disposable plastic scoop or disposable COLIWASA

IMPORTANT – a new scoop or COLIWASA must be used for each sample pulled

4. Place all sampling debris in plastic garbage bag(s) and dispose of as Branch Generated Debris
5. Ensure the sample jar lid is tight. Seal the lid to the jar by wrapping with packaging tape.
6. Attach *Custody Seal* across the lid of the jar in such a way that the seal must be broken to open the jar. The *Custody Seal* must be signed by the sampler and contain the date, time the sample was pulled, and unique sample ID (ID must follow required format and match the ID written on the accompanying COC).
7. Place the sample jar(s) into a “Samples Only” refrigerator until ready to ship.
8. When ready to ship, place the quart sample jar into the TCLP kit with **frozen freezer packs**. Use additional bagged ice if shipping during warm temperatures. Close up the Styrofoam cooler and place the COC paperwork on top before sealing up the cardboard shipping box using shipping tape.

IMPORTANT - Ship samples Monday thru Wednesday via *FedEx Priority Overnight* to ensure they arrive Thursday or Friday when lab personnel are available to unpack and place in a refrigerator.

TestAmerica Laboratory
Attention: Debra Bowen (412.963.2445)
301 Alpha Drive, RIDC Park
Pittsburgh, PA 15238

CRITICAL – SAMPLE(S) MUST ARRIVE COLD AND LAB MUST ANALYZE WITHIN 14 CALENDAR DAYS FROM THE DATE YOU PULLED THE SAMPLE(S). IF SAMPLES ARRIVE WARM OR EXCEED 14 DAYS, YOU WILL NEED TO RESAMPLE.

Sampling using a COLIWASA

- Ensure the COLIWASA is functioning properly before use. Confirm that the stopper is securely attached to the plastic rod and provides a good seal when in the closed position.
- **OPEN** the COLIWASA and **SLOWLY** lower into the container until it touches the bottom. The COLIWASA must not be lowered with the stopper in the closed position. Opening the stopper after the tube is submerged will cause material to flow in from the bottom layer only, resulting in gross over-representation of that layer. If lowered too fast, a non-representative sample will result.
- When the COLIWASA touches the bottom of the container, pull up on the stopper mechanism to close the COLIWASA.
- Slowly withdraw the COLIWASA from the container while wiping the outside of the COLIWASA with a disposable wipe.
- Place the end of the COLIWASA into the 32-oz sample jar and discharge contents by slowly opening the stopper mechanism.

Obtaining a Composite Sample (Only those branches that require a composite per permit)

- Use a new disposable plastic bucket
- Use a new COLIWASA for each customer container sampled
- For each customer container sampled, you'll actually need to pull the following two samples
 - Place one COLIWASA volume into the compositing bucket
 - Using the same COLIWASA, fill a new quart glass jar (SK P/N 8895). This sample jar needs to be labeled with the customer name and number associated with the container that is being sampled. This sample will serve as a retain in the event analytical on the composite shows atypical results and we need to analyze all associated customer samples. These retains need to be stored until analytical on the composite sample is reported.
- After sampling all customer containers, mix the contents of the bucket.
- Use a COLIWASA to pull a sample of the mixture from the bucket and submit this sample to TestAmerica following instructions above.

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BRANCH PERSONAL PROTECTIVE EQUIPMENT REQUIREMENTS

WORKPLACE HAZARD ASSESSMENT SUMMARY 2015

TASK								
AQUEOUS BLENDING (MANUAL)	Yes (Np)	Yes	Yes*		S.T w/M	Goggles	Yes, w/pneumatic	
AQUEOUS SERVICE - COLD	Yes (Np)	Yes		Yes	S.T w/M	Yes		
AQUEOUS SERVICE - HEATED	Yes (Np)	Yes		Yes	S.T w/M	Yes		
AQUEOUS TEST ANALYSIS	Yes (Nr or Cp)	Yes		Yes	S.T w/SR	Yes		
BRAKE CLEANING (ABC)	Yes (Np)	Yes		Yes	S.T w/M	Yes		
COOLANT SERVICE	Yes (Np)	Yes		Yes	S.T w/M	Yes		
CONTAINERIZED WASTE (CWS)	Yes (Np)	Yes		Yes	S.T w/M	Yes		
DRY CLEANER SERVICE	Yes (Np)*	Yes		Yes	S.T w/M	Yes		
GUN CLEANERS - UNVENTED	Yes (Np/Cp)*	Yes		Yes	S.T w/M	Yes		APR=HF or FF/Organic vapor
GUN CLEANERS - VENTED	Yes (Np/Cp)*	Yes		Yes	S.T w/M	Yes		
IMAGING SERVICE	Yes (Np)	Yes		Yes	S.T w/M	Yes		
IMMERSION CLEANER SERVICE	Yes (Np)	Yes		Yes	S.T w/M	Yes		
LIGHT BULB SERVICE	Yes (Np)	Yes		Yes	S.T w/M	Yes		
MATERIAL HANDLING	Yes (Np)	Yes		Yes	S.T w/M	Yes		
OIL SERVICE	Yes (PVC or Np)	Yes		Yes	S.T w/SR	Yes		
PARTS WASHER SERVICE	Yes (Np)	Yes		Yes	S.T w/M	Yes		
RETURN/FILL OPERATIONS	Yes (Np)	Yes	Yes*	Yes	S.T w/SR	Yes	Yes, w/pneumatic	

BRANCH PERSONAL PROTECTIVE EQUIPMENT REQUIREMENTS

WORKPLACE HAZARD ASSESSMENT SUMMARY 2015

TASK								
RETURN PRODUCT SERVICE	Yes (Np)	Yes		Yes	S.T w/M	Yes		
SAMPLING - FIELD	Yes (Nc)	Yes	Yes*	Yes	S.T w/SR	Yes		APR=FF/ ORG. vapor/acid gas
SPILL RESPONSE (INCIDENTAL)	Yes (Np)	Yes	Yes*	Yes	S.T w/SR	Yes		APR=HF or FF/ ORG. vapor/acid gas
TANK TRUCK LOAD/UNLOAD	Yes (PVC or Np)	Yes		Yes	S.T w/SR	Yes		
TANK TRUCK TOP SAMPLING	Yes (PVC or Np)	Yes		Yes	S.T w/SR	Yes		
VAC SERVICE	Yes (PVC or Np)	Yes		Yes	S.T w/SR	Yes	Yes, w/pump on	
VISITOR IN OPS AREAS				Yes	Closed toe	Yes		
WWF SERVICE	Yes (Nc)*	Yes		Yes	S.T w/SR	Yes		

Service Reps – must have Safety Vest available

GLOVES

Cr = Cut Resistant glove (work glove)
Np = Supported Neoprene Glove (Outer Glove)
Cp = Chloroprene (5ml) (Inner Glove)
PVC = Poly Vinyl Chloride (Insulated option)
Nc = Nitrile Coated (work glove)

Cr* = Cut Resistant glove (if chemical present – Supported Neoprene)
Nr = Nitrile (8ml) glove
(Np)* = discard if show signs of breakthrough (breakthrough = discoloration, swelling, stiffness, etc.)
PVC = Poly Vinyl Chloride (Insulated option)
(Nc/Cp)* = discard if show signs of breakthrough (breakthrough = discoloration, swelling, stiffness, etc.)

APRON

Tychem QC apron w/ sleeves* = discard if show signs of breakthrough (breakthrough = discoloration, loss of coating, stain on inside of apron, etc.)

FOOTWEAR

S.T. w/M = Steel Toes with Metatarsal Guard
S.T. w/SR = Steel Toes with Slip Resistant Soles

RESPIRATOR / CARTRIDGE TYPE

APR = half face (HF) or full face (FF) air purifying respirator (facial hair shall not come in contact with the face piece seal)

Parts Number - Arbill

Gloves - Cr - Kevlar Shell Nitrile Palm A14240, Np-SK 612, CP-151433, PVC - A141360, Nc-14056, Nr -151943. **Respirator/Cartridge Type** - HF-A500603, FF - A505820, Organic Vapor/Acid Gas- A500710, Organic Vapor - A500730,
Apron - Tychem QC apron w/sleeves - Medium - QC275BYLMD002500, Large - QC275BYLLG002500, Ex. Large - QC275BYLXL002500. **Hard Hat** - 475360-BL27128 - BL6400. **Safety Vest** - A209283. **Goggles** - A303630. **Hearing Protection** - Muffs - A401800, Plugs - A403770.

Parts Number - Century Vallen

Gloves - Cr - Kevlar Shell Nitrile Palm EDM 11-500, Np-SK 612, Cp - GLONPG888-M, PVC-EDM 4-412, Nc-EDM 37-145, Nr-BST 8005PF-L
Respirator/Cartridge Type - HF-3MS 6200, FF-3MS 6800, Organic Vapor/Acid Gas/HEPA-3MS 60923, Organic Vapor/HEPA-3MS 60921, HEPA - 3MS 2096, Dusk Mask - 3MS8511.
Apron - Tychem QC apron w/sleeves - LAK 527. **Hard Hat** - DSI HP542R -02 - SK Logo. **Safety Vest** - NORTV52B4/(SIZE). **Goggles** - UVXS700C. **Hearing Protection** - Muffs - PLT H10A. Plugs - EAR 312 - 1201.

Tab 5
Part II.B

Part II

B. CONTAINERS

The hazardous waste container storage is located in the warehouse building. This area is shown in Figures 8.1-1.

CONTAINMENT SYSTEM

Container Storage Area

The container storage area shown in Figure 8.1-1 occupies the southwestern portion of the warehouse building area which has a sloped concrete floor, and a collection trench to form a spill containment system. The system is maintained. Spills are removed by a hand-held portable electric pump (the coms pump), wet-dry vacuum cleaner, or sorbent materials. The capacity of the containment system is designed to be greater than 10 percent of the total liquid storage capacity in the drum storage area. Since the characteristics of the stored wastes are known, no analyses are performed for the materials collected from the containment area. All collected materials are sent to a permitted recycling or reclamation facility.

Only in the event that a spill was to exceed the containment capacity would spilled wastes be to extend beyond the containment area. There are no doorways into the container storage area within the warehouse, only drive-over tranches and curbing. Due to the volume of containment available and the configuration of the container storage area, it is highly unlikely that any spill would extend beyond this area.

The containment volume is composed of the warehouse sloped concrete floor and the collection trench. The total containment volume is 2,926.8 gallons. The types and number of each container may vary; however, total volume of hazardous waste stored will not exceed the maximum volume of 6,912 gallons. The total volume of hazardous waste and product will not exceed 29,268 gallons. Containment calculations are provided in Figure 8.2.

The containment areas have been coated with Sikagard® 62 or equivalent. Other coatings may be used in the future and will be evaluated by Safety-Kleen to ensure, when properly applied, they are capable of withstanding the products handled by Safety-Kleen. Inspections of the sealant in the containment areas will be conducted as part of the facility inspection plan. If the sealant is

found to be worn or deteriorated such that repairs are warranted, the sealant will be repaired in accordance with the manufacturer's specifications.

Container Movement

In the container storage area, containers are handled with a hand-truck or forklift that is free of sharp points. Every time a drum is moved, a chance exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, containers are tightly covered and kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into another safe container. Each route truck is equipped with a lift-gate or an electric hoist. These devices are used in the loading/unloading operation to minimize chances for spillage and/or employee injury. Drummed waste containers are loaded for transport to a Safety-Kleen/Clean Harbors TSDF at the enclosed concrete dock at the west side of the building. Incoming waste containers are unloaded on the dock at the return/fill station, and also at the bay door on the east side of the building. Parts washer solvent containers are unloaded at the return/fill station dock, and then dumped into the return/fill dumpsters within 24 hours of arrival at the facility. Other containerized waste is moved to the appropriate storage area via hand truck/forklift within 24 hours of arrival at the facility.

All containers are transported, moved, and stored carefully in an upright position. Containers are palletized whenever possible to facilitate shipping and storage. Pallets may be stacked up to seven feet, or two high (whichever is higher), while in storage. This will prevent the containers from contacting any standing liquid while they are in storage. The containers will be arranged so that at least two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling.

INCOMPATIBLE, IGNITABLE, AND REACTIVE WASTE MANAGEMENT

All materials are managed in accordance with the local fire protection code and fire department recommendations. All ignitable wastes are stored at least 50 feet from the property line. Per 40 CFR Part 264.177(a), incompatible wastes, or incompatible wastes and materials, must not be placed in the same container, unless 40 CFR Part 264.17(b) is complied with. The facility does not routinely manage unwashed containers that may previously have held materials that would be incompatible with wastes stored at the facility. Also, the used parts washer solvents and used aqueous parts washer solvents consist of materials that are compatible and suitable for bulking.

Procedure for Managing Waste Types

The solvents stored at this facility are typically compatible with each other and with other materials handled at this facility. In some isolated instances, special waste segregation procedures may be necessary at this facility. The USDOT segregation table, found in 49 CFR Part 177.848 is used as a guideline for storage of hazardous materials at the facility. Wastes are stored primarily in polyethylene and steel containers. Immersion cleaner, dry cleaner, paint waste, and FRS (transfer) waste containers are never opened at the branch. Overpack containers are used for the management of containers whose integrity has been compromised. For ease of inventory control and product integrity, separation and grouping of both used and unused solvents is a standard practice at the branch. All containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with USDOT shipping container specifications.

Potential Fire Sources

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

1. *All wastes and products are kept away from ignitable sources* – Personnel must confine smoking and open flames to the Branch designated area which is located outside the front door of the office area. No other smoking areas are designated. The parts washer solvent handling area and the aboveground storage tanks are separate from the warehouse area to minimize the potential for a fire to spread or injury to personnel to occur.
2. *Ignitable wastes are handled so that they do not:*
 - Become subject to extreme heat or pressure, fire, explosion, or a violent reaction – The parts washer solvent waste is stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or subject to violent reactions. The tanks are vented and the containers kept at room temperature to minimize the potential for pressure build-up.
 - Produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health – The vapor pressure of petroleum-based parts washer solvent is low (2 mm-Hg) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers are carefully segregated at this facility and the solvent vaporization will be minimal under normal working conditions.
 - Produce uncontrolled fire or gases in quantities sufficient to pose a risk of fire or explosion – See above and below.

- Damage the structural integrity of the Safety-Kleen facility – The solvents stored at this facility will not cause deterioration of the tank, containers, or other structural components of the facility.
- 3. *Adequate aisle spacing is maintained* to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.
- 4. *“NO SMOKING” signs are posted* in areas where solvents are handled or stored.
- 5. *Fire extinguishers are inspected* weekly by Branch personnel.

External Factors

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside. Also, the container storage area is in a building which is inaccessible to unauthorized personnel.

1. *Vandalism* – Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the Contingency Plan (Section 5)
2. *Employee Strikes* – A strike would not result in a solvent spill or fire.
3. *Power Failure* – A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.
4. *Flooding* – The site elevation is above the projected 100-year floodplain.
5. *Storms or Cold Weather* – The solvent return/fill station is covered to eliminate the possibility of rain or snow entering the dumpsters. No opportunity is foreseen to affect the facility with snow, cold weather, or storm weather.
6. *Hurricanes* – Facility will follow the procedures within the contingency plan.

CONTAINER MANAGEMENT

General Protocols

Container management is of paramount importance to Safety-Kleen. All containers are routinely inspected to ensure that the containers are in good condition. If rusting or structural defects are visible, or if the container begins to leak, the contents of the container are immediately transferred to a new sound container. Overpack containers are commonly used for the management of containers whose integrity has been compromised.

Hazardous waste containers are always kept closed during storage except when adding or removing waste. Containers are not handled or stored in a manner that could potentially cause a rupture or leak.

Specific Waste Stream Containers

Parts washer solvent is collected in containers and generally emptied into the wet dumpster at the return/fill station (which is piped to the tank farm). The containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications.

The immersion cleaner is always contained in partially filled covered containers before, during, and after its use. Until received at the recycle center, the immersion cleaner is never transferred to another container. The containers of used immersion cleaner are returned to the facility and stored in the designated container storage area before shipment to a permitted Safety-Kleen/Clean Harbors TSDF.

Dry cleaning waste is stored in steel or polyethylene containers and consists of perchloroethylene-based waste and naphtha-based waste. The contents of the dry-cleaning waste containers are not removed or processed at the Tallahassee Branch. It is stored as permitted or transfer waste prior to shipment to a permitted Safety-Kleen/Clean Harbors TSDF.

Paint wastes consist of various lacquer thinner and paints. The waste is collected in containers at the customer's location and the containers are then stored in the container storage area or transfer area of the warehouse. The paint wastes are sent to a permitted Safety-Kleen/Clean Harbors TSDF.

FRS/Transfer wastes are stored in steel, polyethylene, and fiberboard containers that are compatible with the material in them. FRS wastes are managed as transfer wastes.

As part of its protocol for handling mercury-containing lamps and devices destined for recycling, the Branch provides customers with four-foot and eight-foot boxes which hold up to 39 lamps. Other DOT approved containers are used for mercury devices. Boxes are inspected prior to transport from the customer to the Branch. Boxes containing broken lamps are not accepted by Safety-Kleen. If the lamps are broken while in transit or the custody of Safety-Kleen, the entire

contents of the box are sealed in plastic shrink wrap or transferred to another container and closed. The boxes are picked up at customer locations and are stored at the Branch in the transfer waste areas. The boxes used to store mercury-containing lamps and devices are labeled in accordance with Florida Administrative Code (FAC) 62-737.400(5)(b). The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. If the mercury recovery or reclamation facility does not accept broken lamps, then the lamps will be characterized and managed as hazardous waste if necessary.

CONTAINER INSPECTION

The purpose of the container inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of hazardous waste management and other material management facilities to ensure proper operation, maintain compliance, and prevent the release of hazardous wastes to the environment. The Branch Manager or designee is responsible for carrying out the inspections of all hazardous waste management facilities in accordance with the following procedure and schedule.

Inspections are completed electronically (CO CSA Inspection). In the event the electronic inspection system is unavailable they may be completed on paper. Examples of the Inspection Logs for the container storage area, transfer areas, and associated loading/unloading areas are presented at the end of Part II.B. Daily container storage area inspections include the following:

- Verify that total volume is within the permitted limits;
- Physically examine the condition of containers to verify that leaks have not occurred since the last inspection;
- Verify that all container identification, dates, and hazardous waste labels are attached and current;
- Inspect container placement and stacking such as aisle space, height, and stability of stacks; and
- Examine containment areas to detect signs of deterioration and failure of the containment system such as cracks, breakage, settlement, and spillage.

As deficiencies are detected, the Branch Manager will ensure that they are remedied promptly. Any deficiencies which could create an environmental or human health hazard will be rectified immediately.

Other inspections at the facility include those performed on a weekly basis for the security systems. These inspections are described in the contingency plan.

CONTAINER STORAGE AREA CLOSURE PLAN

The container storage area closure plan and closure cost estimates are provided as part of the overall closure plan for the facility in Part II K.

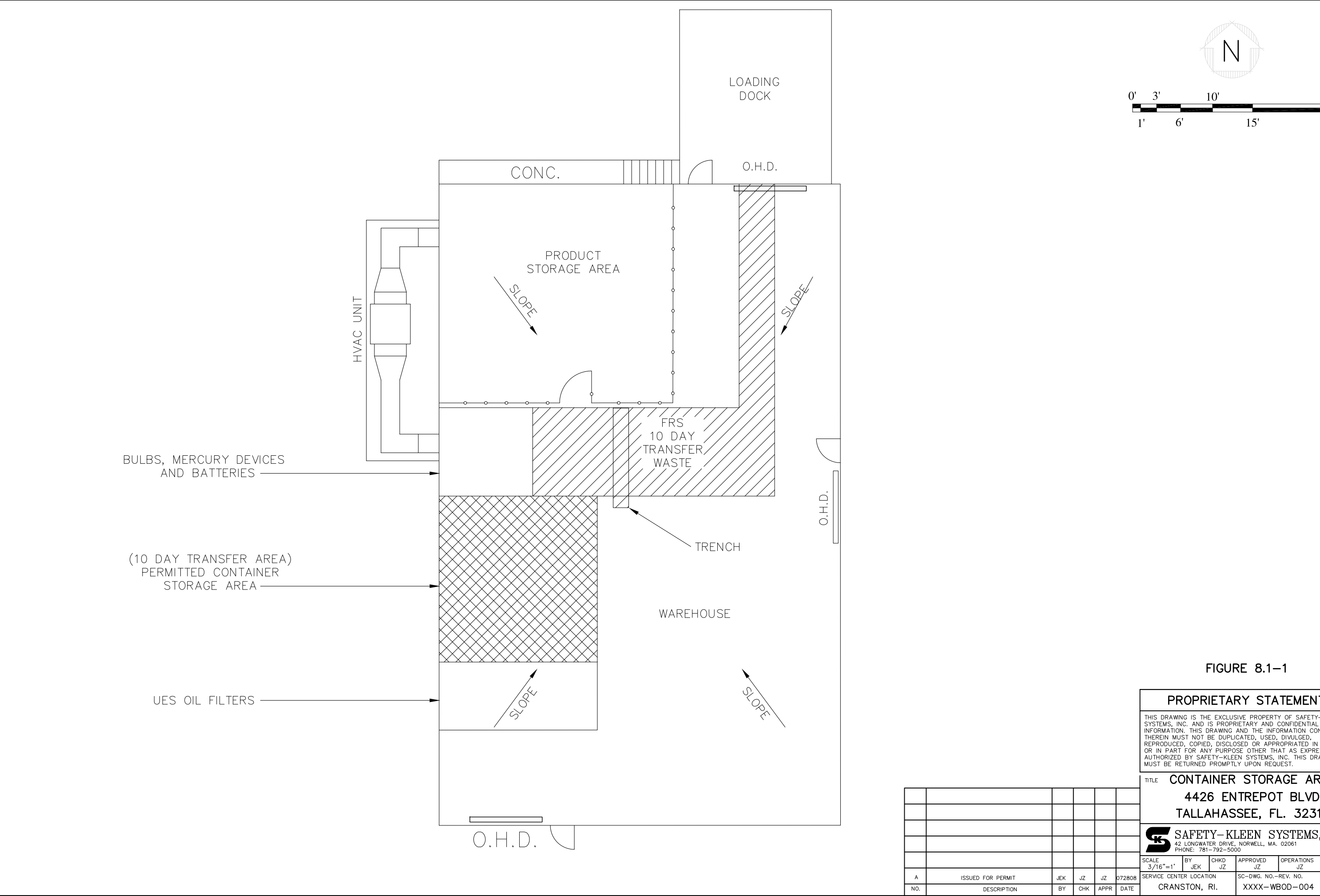


FIGURE 8.1-1

PROPRIETARY STATEMENT

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TITLE

CONTAINER STORAGE AREA
4426 ENTREPOT BLVD.
TALLAHASSEE, FL. 32310

 SAFETY-KLEEN SYSTEMS, INC.
42 LONGWATER DRIVE, NORWELL, MA. 02061
PHONE: 781-792-5000

SCALE 3/16"=1'	BY JEK	CHKD JZ	APPROVED JZ	OPERATIONS JZ	DATE 8/30/24
SERVICE CENTER LOCATION			SC-DWG. NO.-REV. NO.		SHEET NO.
CRANSTON, RI.			XXXX-WBOD-004		A



Project: SKI Talbasse HW Permit Appl.
Subject: Calculation of Maximum Warehouse Building Capacity

Project No.: 0479208
Completed By: Rwfox
Checked By: MM

Figure 8.2

Sheet: 1 of 1
Date: 12/9/19
Date: 12/9/19

Available Warehouse Building Containment Volume

The attached figure (Figure 8.1-1) shows the general configuration of the warehouse building containing the Container Storage Area (CSA). The available containment volume is provided by two structural components of this building as follows:

1. Sloped Floor Slab
2. Dead Head Collection Trench

Measured dimensions for these components are shown on the attached figure. The available containment volume is calculated for each component and the resulting total is taken as 10% of the maximum allowable waste storage capacity.

Floor Slab

The available containment volume provided by the concrete floor slab is calculated as the frustum of a pyramid:

$$V_{FS} = \frac{d}{3} (A_{FS} + A_{TR} + \sqrt{A_{FS} \times A_{TR}})$$

Where, d = depth of Floor slope (3") = 0.25'

$$A_{FS} = \text{area floor slab (78'6" by 47'4")}$$
$$= 78.50' \times 47.33' = 3,715.67 \text{ ft}^2$$

$$A_{TR} = \text{area trench (12'0" by 2'1")}$$
$$= 12.00' \times 2.083' = 25.00 \text{ ft}^2$$

$$V_{FS} = \frac{0.25}{3} (3,715.67 + 25 + \sqrt{3,715.67 \times 25})$$

$$= 337.12 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3$$

$$= 2,521.6 \text{ gallons}$$



Collection Trench

The available containment volume provided by the dead head collection trench is calculated as a rectangular parallelepiped:

$$V_{TR} = L_{TR} \times W_{TR} \times D_{TR}$$

where, L_{TR} = trench length (12' 0") = 12.0'

$$W_{TR} = \text{trench width (2' 1")} = 2.083'$$

$$D_{TR} = \text{trench depth (2' 2")} = 2.167'$$

$$\begin{aligned} V_{TR} &= 12.0 \times 2.083 \times 2.167 \\ &= 54.17 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 \\ &= 405.2 \text{ gallons} \end{aligned}$$

Warehouse Building Total Containment Volume

The available containment volume for the warehouse building is the total of the floor slab and containment trench volumes:

$$\begin{aligned} V_{WB} &= V_{FS} + V_{TR} \\ &= 2,521.6 + 405.2 \text{ gallons} \\ &= 2,926.8 \text{ gallons} \end{aligned}$$

Setting this volume equal to 10% of the maximum waste storage volume yields the following allowable waste storage:

$$\begin{aligned} V_{WB} &= 0.10 \times V_W \text{ or } V_W = V_{WB} \times 10, \text{ so} \\ V_{AW} &= 2,926.8 \times 10 \\ &= 29,268 \text{ gallons (532 containers @ 55 gallons each)} \end{aligned}$$

In addition, no single container should exceed the available containment volume of 2,926 gallons.



Project: SKI Tallahassee H/W Permit Appl.
Subject: Calculation of Maximum Warehouse
Building Storage Capacity

Project No.: 0979208
Completed By: EWF
Checked By: MH

Figure 8.2
Sheet: 3 of 4
Date: 12/9/19
Date: 12/9/19

Permitted Waste Storage Volume

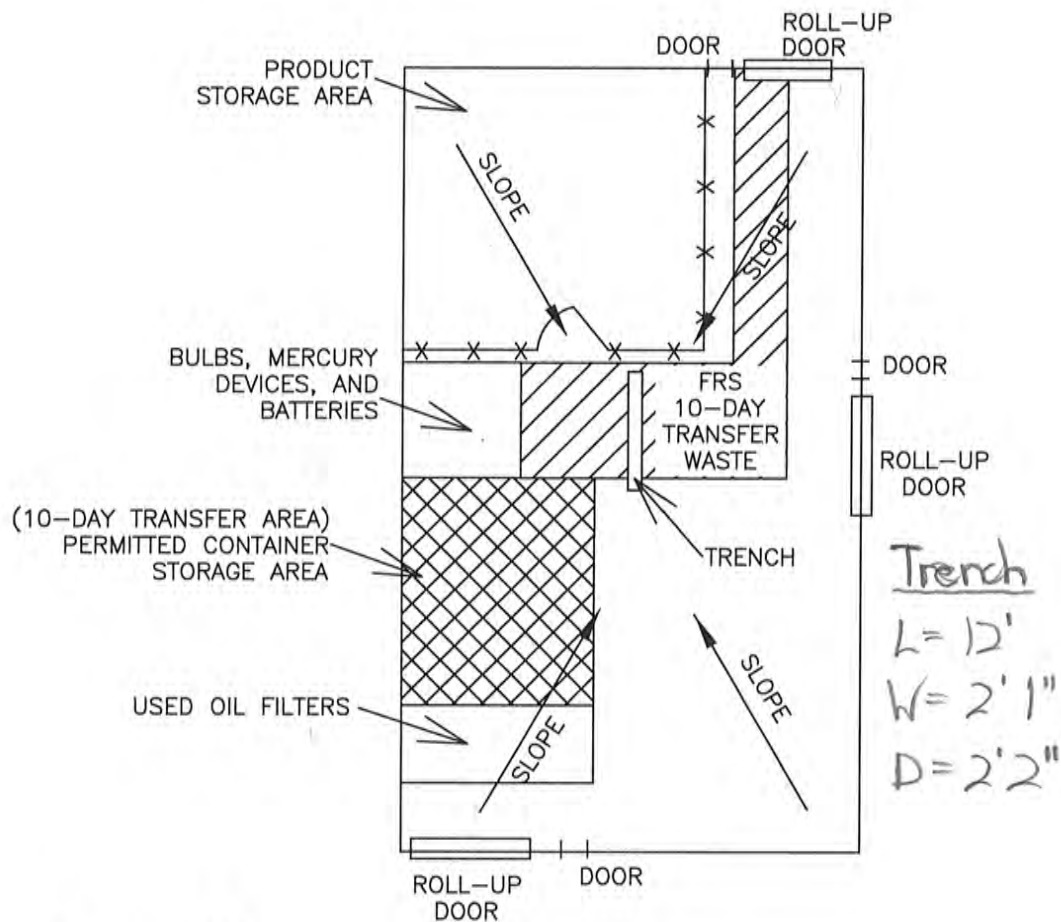
Thus, the permitted waste storage volume for the Tallahassee Branch is determined to be much less than allowed by the available containment volume:

$$V_p = 6,912 \text{ gallons (125 containers @ 55 gallons each)}$$

$$\underline{\underline{V_p \ll V_{AW}}} \quad (V_p \approx 24\% V_{AW}) \quad \checkmark \text{ OKay}$$

FIGURE 8.1-1
CONTAINER STORAGE AREA
SAFETY-KLEEN SYSTEMS, INC.
TALLAHASSEE, FLORIDA

REVISION 1 - 10/01/19



Floor Slab

L=78'6"

W=47'4"

D=3" (slope=0.62%)

Note: Building dimensions as measured by Safety-Kleen branch staff on December 9, 2019.

LEGEND

—X—X— FENCE



0 20
APPROXIMATE SCALE
(FEET)



ERM.



CO Branch Generated Hazardous Waste Container Inspection Log

Form Code: 1423

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Branch Generated Hazardous Waste Inspection Instruction	
Note the condition of inspection items. Note the number and capacity of branch generated hazardous waste containers only (10-day transfer containers collected from customers do not apply). All unsatisfactory findings must be explained below. Include any repairs, changes, or other remedial actions required or performed.	
CO Branch Generated Hazardous Waste Container Inspection Log Items	
Number of branch generated hazardous waste containers in storage area:	
Capacity of branch generated hazardous waste containers in storage area (16, 30, 55, 85, etc.):	
Notation of observations made (acceptable/not acceptable condition, correct labels, leaking, etc.)	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



CO CSA Inspection

Form Code: 28

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO CSA Inspection Instructions	
Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.	
CO CSA Inspection Items	
Container Placement and Stacking - Check for evidence of failure (e.g., containers on pallets, pallets too high, unstable, other).	
Sealing of Containers - Check for evidence of failure (e.g., containers not closed or sealed, open).	
Labeling of Containers - Check for evidence of failure (e.g., no label, improper label, content, other).	
Container Integrity - Check for evidence of failure (e.g., condition, bulging, leaks, rust, corrosion, other). Containers do not have waste/staining on the outside which would require cleaning or overpacking.	
Pallets - Check for evidence of failure (e.g., broken, loose, condition).	
Doors - Check for evidence of failure (e.g., indoor area, broken or not working as intended).	
Base/ Foundation/ Roof - Check for evidence of failure (e.g., cracked, gaps, other).	
Berms/ Racks - Check for evidence of failure (e.g., cracks, gaps, broken, other).	

Site Generated Waste - debris, used absorbents, used PPE, aerosols, etc. - Check for evidence of failure (e.g., waste not containerized, proper storage location, container type, container label, other).	
Exit Signs - Check for evidence of failure (e.g. missing, lamps, battery backup, other).	
Aisle Space - Check for evidence of failure (e.g., minimum 2 ft required, other).	
Containment Area - Check for evidence of failure (e.g., secondary containment, curbing, floor, cracks, deterioration, ponding or wet spots, other).	
Sumps - Check for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, other).	
Loading/ Unloading Areas - Check condition of area (e.g., no free liquid, ponding or wet spots, available spill equipment, spill equipment location, spill kit supply and inventory is adequate, containment deterioration, leaks, pad condition, valve access box, housekeeping, other).	
Communication and Alarm System - Check for evidence of failure (e.g., test function, siren, strobe, other).	
Storage Capacity - Check for acceptable limit (e.g., area or permit restrictions, type restriction, volume limit, other).	
Bonding and Grounding - Check for evidence of failure (e.g., loose, broken, corrosion or deterioration, other).	
Pumps - Check for evidence of failure (e.g., deterioration or broken, leaks, other).	
Inventory Age - Check for acceptable limit (e.g., within area limits, permit restrictions, other).	
Satellite Accumulation Containers - Check for evidence of failure (e.g., container open, >55	

gallons, label, other).	
Spill Equipment - Check that spill equipment is available, clean, and ready for use. Spill equipment is placed in the correct location. Spill equipment includes the correct types of equipment in sufficient quantities.	
Additional Comments or Notes	
Comments	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	

EXAMPLE

Tab 6
Part II.C

Part II

C. TANK SYSTEM

ENGINEERING ASSESSMENT OF TANK SYSTEM

A formal tank integrity inspection of the 15,000-gallon RCRA Permitted Hazardous Waste Tank (Used Solvent) was performed on February 21, 2024. A copy of that inspection report is included at the end of Part II C.

TANK SYSTEM SPECIFICATIONS

There are three horizontal aboveground steel tanks at the facility located inside the permitted tank storage unit and two double-walled steel tank adjacent to the tank farm (Figure 9.2-1).

Hazardous waste used parts washer solvent is returned from Safety-Kleen's customers in containers and the solvent is transferred via the wet dumpster into the 15,000-gallon RCRA Permitted Hazardous Waste Tank (Used Solvent), prior to bulk shipment to permitted Safety-Kleen TSDF. The other two tanks in the permitted tank storage unit include two (2) 15,000-gallon Used Oil tanks. Of the three AST's located within the Permitted Tank Storage Unit and the two double walled tank, the only hazardous waste permitted tank is the RCRA Permitted Hazardous Waste Tank (Used Solvent). The other four AST's, while not RCRA regulated, are registered per Chapter 62-762, F.A.C. with the Facility ID No. 9300106. All of the tanks are grounded.

Material Compatibility

Waste stored in the RCRA Permitted Hazardous Waste Tank (Used Solvent) at this facility is used parts washer solvent. The parts washer solvent is compatible with the mild steel tank structure. As with all petroleum storage vessels, water will accumulate over time due to condensation and the water will accumulate in the bottom of the tank.

Tank Operation Procedures and Design

Used parts washer solvent is returned from customers via containers and poured into the wet dumpster which has a barrel washer enclosed within. The container is then placed on roller brushes within the barrel washer. As the machine is turned on, the container rotates on the brush and the outside of the container is cleaned. A nozzle in the barrel washer sprays a stream of solvent into the bottom of the container to flush the inside of the container. The machine is then

turned off and the container is allowed to sit for a few seconds so residual solvent drops to the bottom of the wet dumpster, then removed. This process takes several seconds per container. The container is then refilled with clean solvent using a pump and nozzle assembly similar to a gasoline dispenser. The waste is transferred from the wet dumpster to the RCRA Permitted Hazardous Waste Tank (Used Solvent) via piping and a pump.

The used parts washer solvent is fed to a sump in the bottom of the wet dumpster and automatically pumped to the RCRA Permitted Hazardous Waste Tank (Used Solvent). A basket within the sump collects sludge from the cleaning operations. This sludge is removed daily at the end of the drum cleaning operations and placed into a satellite accumulation container next to the wet dumpsters. The wet dumpsters are located in the return/fill station, which is underlain by a secondary containment structure.

The RCRA Permitted Hazardous Waste Tank (Used Solvent) is designed and constructed to be compatible with the materials stored. The tank has an 8-inch Flanged Emergency Pressure Relief Vent and pressure/vacuum vent that were installed in accordance with National Fire Protection Association (NFPA) standards and is equipped with a high-level alarm. A 3" emergency gate valve is located at the base of the tank where the outgoing piping is threaded into the tank. The tank seams are lapped with full fillet welds. The weld was performed with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer). The RCRA Permitted Hazardous Waste Tank (Used Solvent) was installed new in 1998. The tank is aboveground, supported by an insulated carbon steel skirt that is placed on an 8-inch concrete foundation slab. Therefore, no surface run-on will contact the wastes stored at the site and no run-off collection system is required. To minimize the amount of precipitation that may collect inside the containment area, a metal canopy has been installed over the Permitted Tank Storage Unit. If rainwater does accumulate in the containment area and it has been verified that no spill has occurred, the rainwater will be discharged to the ground surface via pump and hose. Only the Branch Manager or someone operating under his/her direct orders may discharge to the ground surface. If it is not possible to verify that a spill has occurred, the rainwater will be disposed of in the wet dumpster.

Controls and Spill Prevention

The permitted tank storage unit and the return/fill station have been sealed with a chemical resistant coating. The RCRA Permitted Hazardous Waste Tank (Used Solvent) has been fitted with a Moormann Analog Automatic Tank Gauge (information on the gauge is provided at the end of this section). Level gauges are used to measure liquid levels in tanks. Float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tanks being 95% full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. The gauges of the tank are read before filling the tank with additional material. Tank level readings are also taken prior to the filling of a tanker truck to prevent overfilling of the truck or tank. A tanker truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the above-ground tanks. The tank should be operated at a maximum volume of 14,250 gallons (95% of capacity). The secondary containment under the tanks and return/fill shelter is cleaned within 24 hours of a spill, or in as timely a manner as possible, to prevent harm to human health and the environment.

2” single-walled steel piping from the wet dumpsters in the return/fill shelter to the top of the RCRA Permitted Hazardous Waste Tank (Used Solvent) is connected by threaded connectors. This piping runs under the dock and leaves the warehouse building on the north side of the Return/Fill shelter. At that point, the piping system continues north towards the permitted tank storage unit and is outside secondary containment (this part of the system has welded connectors). Once it reaches permitted tank storage unit secondary containment the piping, with threaded connectors, runs vertical to the top of the tank.

The piping system leaving the tank is constructed of 3” single-walled steel and is inside secondary containment. Figure 9.1-1 found in at the end of this section details the system.

Leak Detection System

The Safety-Kleen Tallahassee branch has installed an automatic leak detection system at the permitted tank storage unit for the RCRA Permitted Hazardous Waste Tank (Used Solvent). This system will enable detection of leaks, or releases, to the secondary containment 24-hours a day. The system consists of an Intellipoint sensor, which is placed on the wall of the permitted tank storage unit secondary containment just above the floor. The sensor detects the presence or absence of liquids. It will be monitored 24-hours a day, seven days a week, by a 3rd party (ADT).

If the sensor detects liquid it will immediately send a warning notice to ADT, who will then immediately call the emergency coordinator for the Tallahassee branch. This system will allow continuous leak detection monitoring when the facility is not occupied.

IGNITABLE OR REACTIVE WASTE REQUIREMENT (40 CFR PART 264.198(b))

The owner or operator of a facility where ignitable or reactive waste is stored or treated in a tank must comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code," (1977 or 1981), (incorporated by reference, see Sec. 260.11) (264.198(b)).

TANK SYSTEM SECONDARY CONTAINMENT

Tank Containment

The three tanks in the permitted tank storage unit are aboveground, underlain by a 25' x 59.5' concrete slab, surrounded by a 36 1/4" to 38" high concrete wall and are covered by a metal canopy. The wall height in the containment varies with the floor slope and directs flow toward an approximately 22-gallon blind sump. No surface run-on or precipitation will come into contact with the wastes stored in the permitted tank storage unit and no run-off collection and management system is deemed necessary. The layout of the permitted tank storage unit is shown in Figure 9.2-1, found at the end of this section. Permitted tank storage unit and Return/Fill Shelter containment calculations are shown in Figure 9.2-2. The containment system in the permitted tank storage unit has been coated with Sikaguard® 62 or its equivalent, and is free of cracks. It is sufficiently impervious to prevent seepage into and through the concrete. Concrete is fully compatible with the waste stored. Inspections of the sealant will be conducted as described in the Tank System Inspections. If the sealant is found to be worn or deteriorated such that repairs are warranted, the sealant will be repaired in accordance with the manufacturer's specifications.

Return/Fill Containment

The return/fill shelter (Figure 9.3-1) is located between the warehouse and the office. The floor is sloped to two blind sumps. One wet dumpster is located on a raised grating over concrete. This wet dumpster handles the flow of used parts washer solvent to the RCRA Permitted Hazardous

Waste Tank (Used Solvent). This dumpster is not intended for storage but can hold a maximum of 75 gallons.

The area is designed such that the route trucks can be backed into the return/fill shelter and up to the grated dock. The roof extends over the truck unloading area so that no precipitation can get into the return/fill shelter containment area. Return/Fill Shelter containment calculations are found in Figure 9.3-2. This area is mainly used to load/off-load containers, dump used solvent, clean parts washer drums and store clean parts washer solvent containers. Waste container storage does not take place at the Return/Fill Shelter. Any waste containers off-loaded in this area are moved to their proper storage location within 24 hours.

TANK SYSTEMS INSPECTIONS

The purpose of the inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of hazardous waste management and other material management facilities to ensure proper operation and maintain compliance. The Branch Manager or that person's designee is responsible for carrying out the inspections of all hazardous waste management facilities in accordance with the following procedure and schedule. Inspections are completed electronically (CO Tank Systems Inspection and CO Return and Fill Area). Examples of the Daily Inspection Logs are found at the end of Part II.C. Daily inspections of the tank and dumpsters will consist of the following:

- Check volume (liquid level) in tank.
- Observe tank exterior for loose anchoring, wet spots, leaks.
- Check the automatic high-level alarm. In addition, measure the depth of used solvent in the tanks to confirm the proper functioning of the automatic alarm system and to determine unexpected deviations in tank measuring data, or a sudden drop in liquid level, which may indicate leakage.
- Inspect secondary containment coating, walls, and piping (All piping is above ground).
- Inspect transfer pumps for leaking seals and overheated motors.
- Inspect the solvent dispensing hose, fittings, and valve for any leaks, damage, or wear that could cause a leak to develop.
- Inspect the valves for evidence of leaking. Stem leaks from worn glands and warped valve bodies should be repaired. If the valve cannot be repaired, replace the unit.

Also, the tanks will be visually inspected and tested periodically. The period of time between tank integrity inspections for the RCRA Permitted Hazardous Waste Tank (Used Solvent), including shell thickness testing, will not exceed ten years. This time frame for tank inspection is adequate based on Safety-Kleen's experience at its other facilities in Florida. Daily inspection of the solvent return receptacle (wet dumpster) will consist of an inspection for leaks and excess dumpster mud build-up.

TANK SYSTEM CLOSURE AND CONTINGENT POST-CLOSURE PLAN

The tank system closure plan is provided as part of the overall closure plan for the facility in Part II K. As discussed below, a contingent post-closure plan for the tank is not required.

TANK SYSTEM CONTINGENT POST-CLOSURE PLAN

The tank system at the Tallahassee facility meets the secondary containment requirements of 40 CFR 264.193, and is, therefore, not required to have a contingent post-closure plan under 40 CFR 264.197(c). In addition, Safety-Kleen intends to remove or decontaminate all tank system components, associated containment systems, and contaminated soils, if any, at the time of closure. However, should future conditions indicate that all contaminated soils and tank system components cannot practicably be decontaminated or removed, then a plan to perform post-closure care in accordance with the post-closure care requirements that apply to landfill (40 CFR 264.310) will be prepared for implementation upon FDEP approval.

RESPONSE TO LEAKS AND DISPOSITION OF UNFIT-FOR-USE TANK SYSTEMS

In the event that a leak or spill were to occur from a tank system or secondary containment system, the actions identified herein will be undertaken.

Immediate Response

All waste flow to the tank system in question will be ceased immediately. An inspection will be undertaken to identify the cause of the release. Waste flow to the tank system will not resume until the tank system has been inspected, repaired, and declared fit for use. In order to prevent further releases, or to allow inspection and a repair of the system, it may be necessary to remove the waste from the tank system. This waste removal will occur within 24 hours after detection of the leak, or at the earliest practicable time.

All material released to the secondary containment area will be removed within 24 hours, or in as timely a manner as possible, to prevent harm to human health and the environment. Every reasonable effort will be made to prevent migration of the release to soils or surface water. If necessary, visible contamination of surface water and soil will be removed and properly disposed of.

Notifications

Spills less than or equal to one pound and immediately contained and cleaned up are exempt from reporting requirements per 40 CFR Part 264.196(d)(2). All other releases require notification as described in the Contingency Plan.

Subsequent Reporting

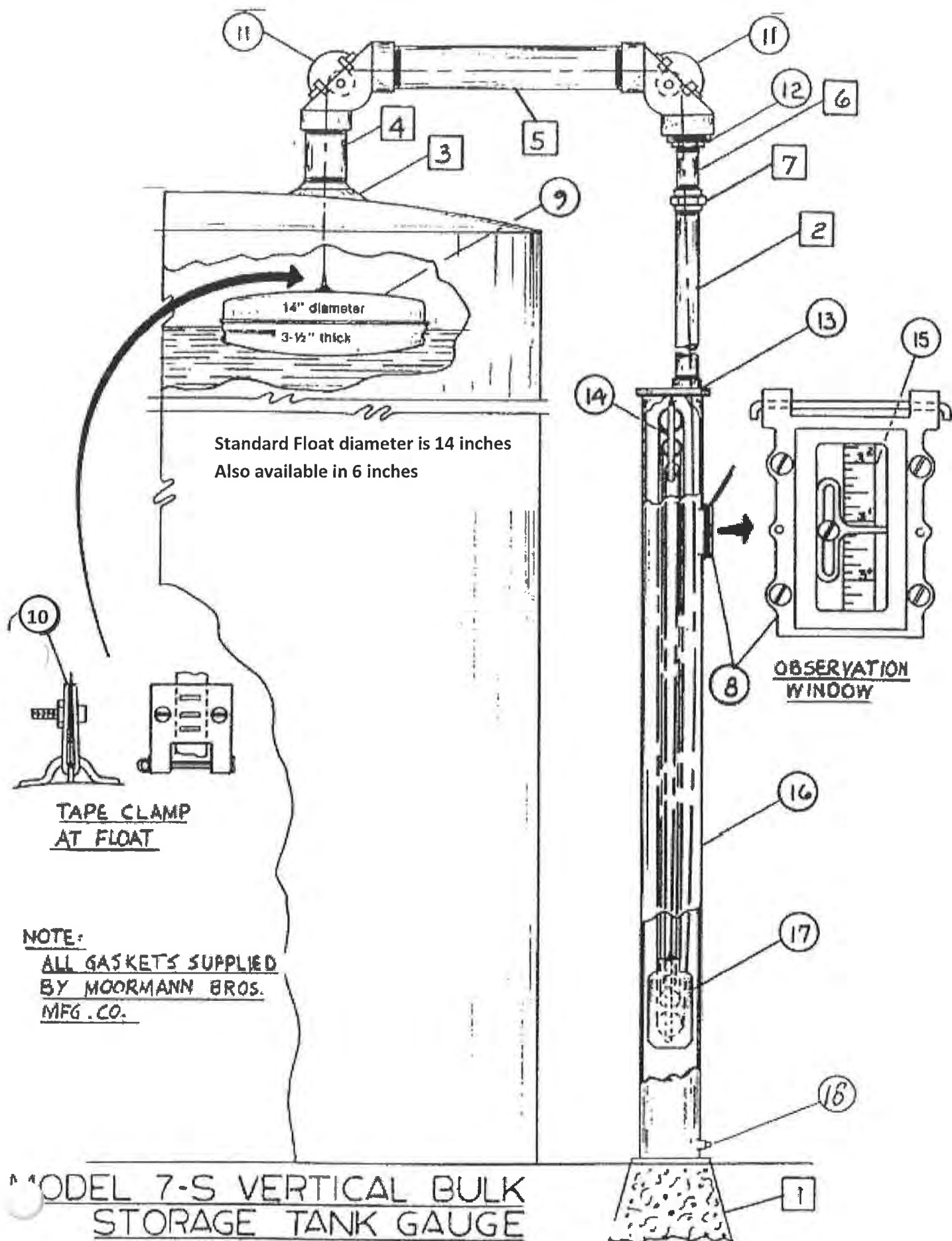
Subsequent reporting will be completed as referenced in the facility Contingency Plan.

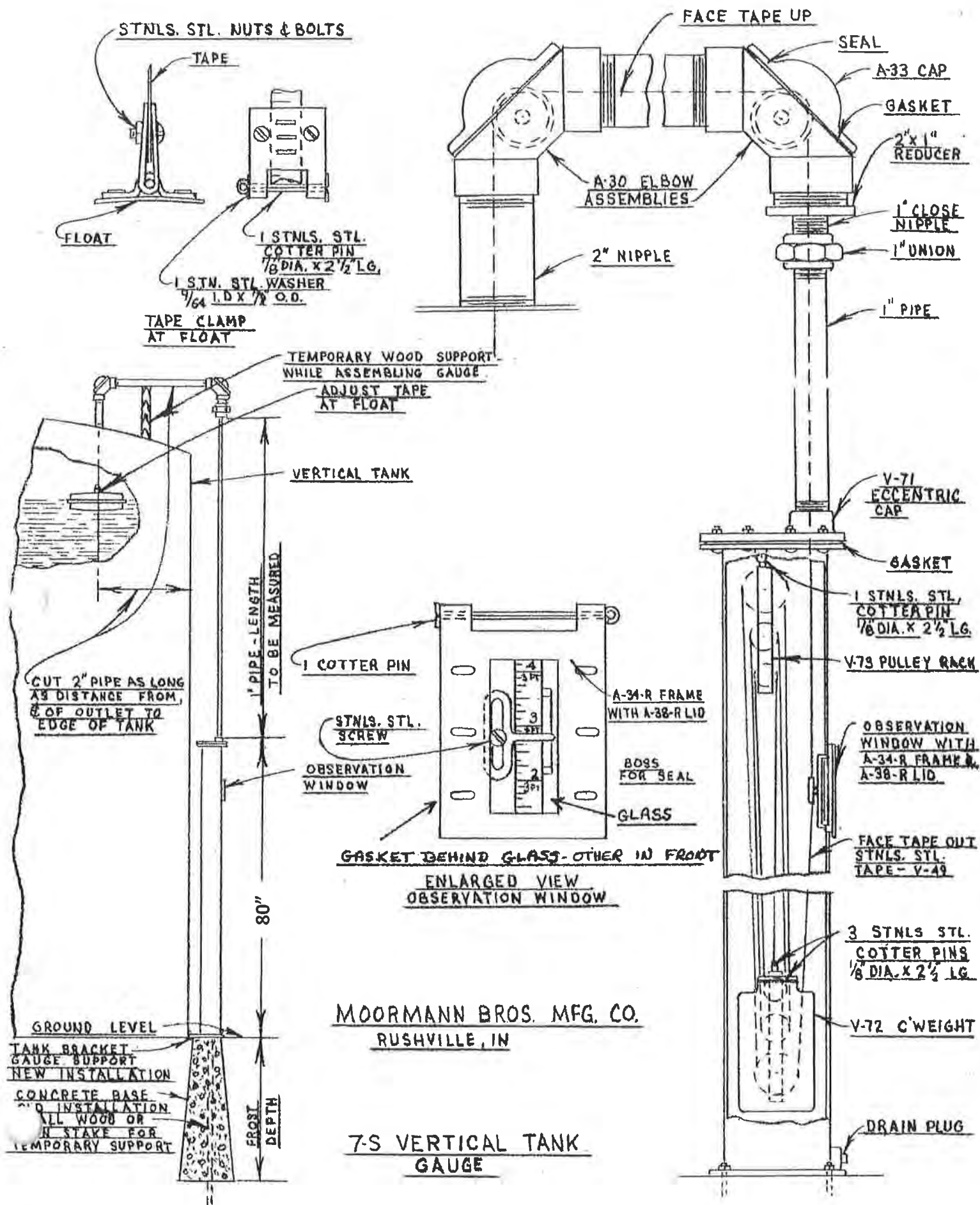
Repair or Closure

If the integrity of the containment system has not been damaged, the system may be returned to service as soon as the released waste is removed and repairs, if necessary, are made. If the tank was the source of the release, the tank must be repaired prior to returning the tank system to service. If the release was from a tank system component which did not have secondary containment, then secondary containment must be provided for this component before the system can be returned to service. The exception to this is if the component can be visually inspected. In this instance, the component may be repaired and returned to service. If a component is replaced, the component must satisfy the requirements for new tank systems and components.

All major repairs must be certified by an independent, registered, professional engineer in accordance with 40 CFR 264.196(f). The engineer must certify, in accordance with 40 CFR 270.11(d), that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. This certification must be placed in the operating record and maintained until closure of the facility.

If repairs that meet these requirements cannot be performed, the tank system must be closed in accordance with the closure plan.



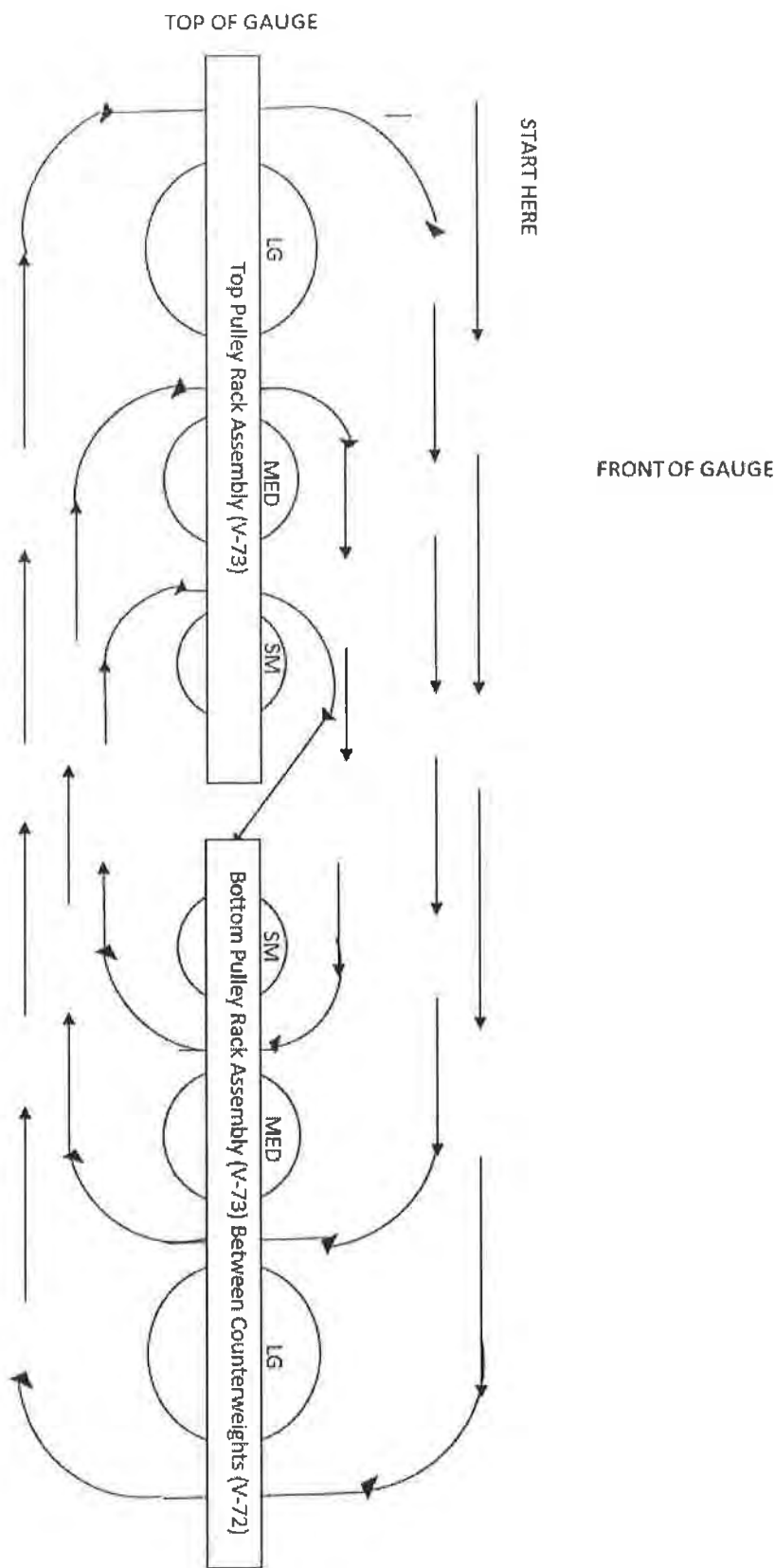


TART TAPE, CLIP END FIRST WITH NUMBERS ON TAPE FACING FRONT OF GAUGE HOUSING, AROUND LARGE BOTTOM PULLEY, UP TO LARGE TOP PULLEY, DOWN TO MEDIUM BOTTOM PULLEY, UP TO MEDIUM TOP PULLEY, DOWN TO SMALL BOTTOM PULLEY, UP TO SMALL TOP PULLEY AND THEN SECURE CLIP END OF TAPE WITH A COTTER PIN TO THE TOP OF THE BOTTOM PULLEY RACK (V-73) ASSEMBLY.

INSTALL THE TAPE WITH THE NUMBERS FACING OUT TOWARDS YOU FROM THE WINDOW OF THE HOUSING.

BE CAREFUL NOT TO THREAD THE TAPE OVER THE BAR AT THE END OF THE PULLEY RACK. MUST PLACE THE TAPE ON THE PULLEY WHEEL.

ENLARGED DETAIL SHOWING HOW TAPE IS WOUND ON PULLEY RACK ASSEMBLIES OF MOORMANN MODEL #7-S.



MATERIAL LIST

MODEL 7-S

For All Vertical Tanks Up to & Including 35'



Material Supplied by Customer (see diagram to match square with number)

1. Gauge Housing Base Support
2. 1" Galvanized Pipe (cut to length)
3. Tank Roof Flange
4. 2" Tank Opening Pipe
5. 2" Galvanized Pipe (cut to length)
6. 1" Galvanized Nipple (any length)
7. 1" Galvanized Union



Material Supplied by Moormann Bros.

(see diagram to match circle with number)

		Quantity per	
Part Name	Part No.	Unit	
8. Observation Window Assembly (Frame & Lid)	A-34 / A-38	1	
9. Float – Aluminum or Stainless Steel	V-75	1	
7-S comes with aluminum float (V-75)			
7-S-SS comes with stainless steel (V-75-S)			
10. Stainless Steel Tape Clamp & Screws	V-93	1	
11. Elbow Assembly Complete	A-30, A-33	2	
12. 2" to 1" Reducing Bushing	B-15	1	
13. Eccentric Cap Complete with Nuts & Bolts	V-71	1	
14. Pulley Rack Assembly	V-73	2	
15. Lufkin Stainless Steel High Visibility Tape	V-49	1	
16. Painted Steel Gauge Housing	V-77	1	
17. Counterweight	V-72	2	
18. Condensation Drain Plug	D-16	1	
19. PE -7 Parts Envelope to include the following: (not shown on diagram)			
• Gaskets – Set for Observation Window	V-81, V-82	1	
• Gasket – Elbow Cap	V-83	2	
• Gasket – V-71 Eccentric Cap	V-84	1	
• Glass – Window	V-86	1	
• Stainless Steel Indicator Finger for Observation Window	V-94	1	
• Cotter Pin – Stainless Steel	V-96	4	

INSTALLATION INSTRUCTIONS – MODEL 7-S

1. Locate gauge position on ground – mark top edge of tank directly above ground location.
2. Measure, cut and thread 2" pipe (as marked on print).
3. Use pipe dope on all connections.
4. Assemble both A-30 elbows and 2" pipe as shown on print.
5. Screw (1) elbow A-30 onto 2" pipe with reducing bushing, close nipple and union as shown on print; other A-30 elbow into 2" nipple in tank then screw other end of 2" pipe into tank elbow, make straight with tank marking.
6. Level 2" pipe, use temporary wood brace, if necessary.
7. Set gauge housing with eccentric cap assembled on ground directly below overhanging elbow.
8. Measure for 1" pipe (reducing bushing in elbow to eccentric cap V-71 on gauge housing) allow for threads, cut and thread 1" pipe.
9. Screw 1" pipe into elbow, then remove V-71 eccentric cap from housing and put on 1" pipe.
CAUTION – Be sure eccentric cap is straight and 1" outlet is farthest away from tank.
10. Fasten pulley rack with large pulley up to eccentric cap using stainless steel cotter pin.
11. Assemble other pulley rack in counterweights with large pulley down.
12. Place counterweight on ground directly beneath eccentric cap pulley rack.
13. Remove A-33 caps from both elbows.
14. Thread tape from tank elbow with numbers up and clip end first through 2" pipe and over elbow pulleys, down through 1" pipe and out eccentric cap, straight down and around bottom pulley in counterweight and up and over top pulley in eccentric cap, down to medium pulley, up and over medium pulley, down and around small pulley on counterweight and up and around small pulley on eccentric cap, down and fasten to lug on counterweight pulley rack – use stainless steel cotter pin. CAUTION – Do not thread tape over or under cross bars in pulley rack. Use caution – do not kink or bend tape. SEE DIAGRAM FOR TAPE ROUTING.
15. Fasten tape to float with tape clamp (as per print). CAUTION – Do not fasten tape clamp too tight as this may damage tape.
16. Place eccentric cap gasket on housing top and insert counterweight assembly into housing.
CAUTION – Do not allow counterweight to drop or jerk as this may cause damage to bearings, also be sure the tape is in groove of pulleys and not on the edge.
17. Fasten housing to eccentric cap with observation window directly below 1" pipe.
18. Place outside strand of tape over tape guide in observation window, CAUTION – Do not bend or kink tape, and put only one strand of tape over tape guide.
19. If tank is empty, adjust tape reading at 1-3/8" (float draft), if it is partially full, set reading exactly with stick, make major tape reading adjustments with the float by slipping tape through tape clamp. Minor adjustments (within 1" make the observation finger). DO NOT CUT TAPE UNTIL FINAL CALIBRATION IS ACCURATE.
20. In setting the reading on the gauge, 1/2" 1/4" or even 1/8" is not close enough, be particular, set gauge to the exact amount of liquid in tank.
21. CAUTION – Let float down in tank easily. Do not let it drop.
22. Assemble observation frame and lid A-34/ A-38 place on housing, tighten for vapor-proofing.
23. Replace A-33 elbow caps with gaskets – tighten for vapor-proofing.
24. Fix base for housing either, concrete, wood post, or steel plate welded to tank, CAUTION – Do not weld gauge housing to tank.
25. In most climates, condensation forms inside the tank and gauge. A drain plug has been provided for draining at the bottom of housing. In most climates, this is necessary 2 times a year (spring & fall). However, in extreme cases, draining is required more often.

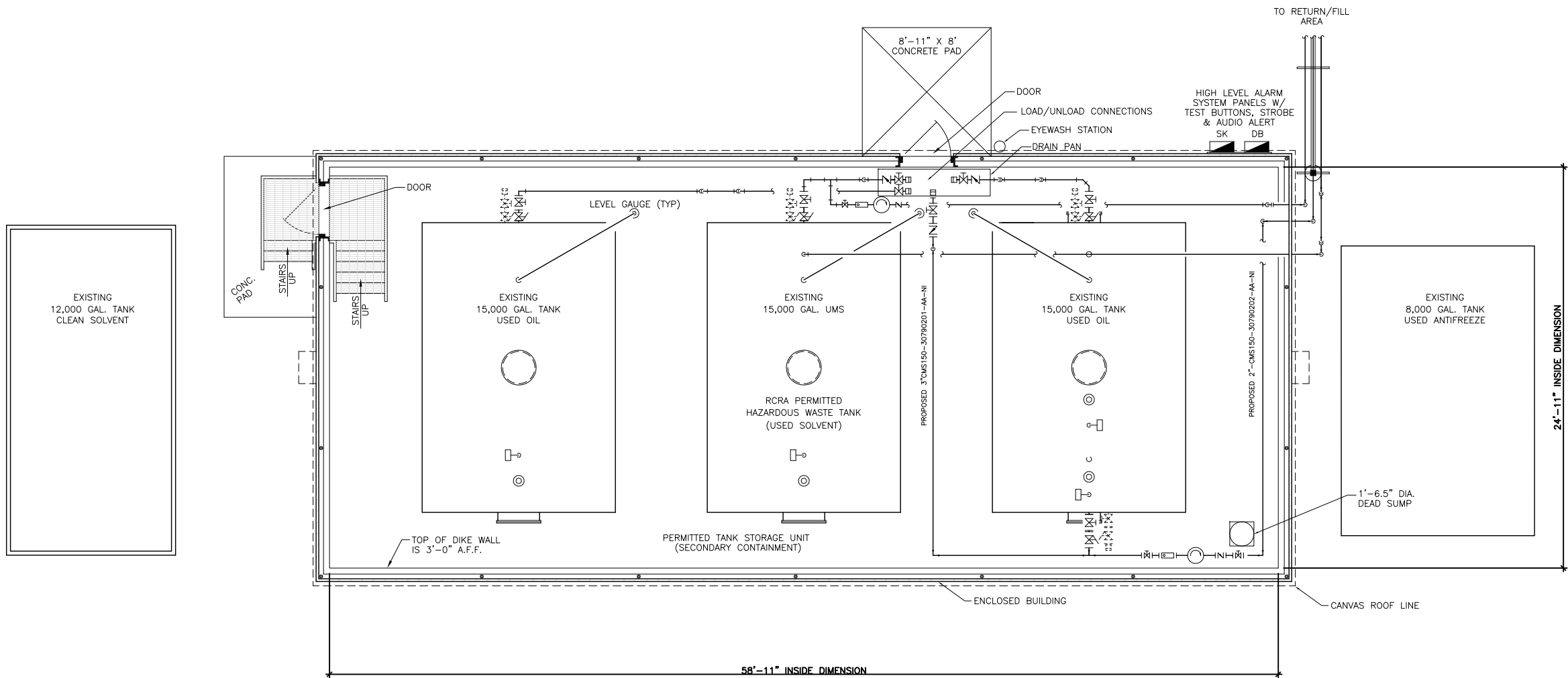
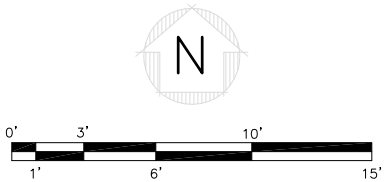


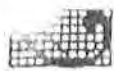
FIGURE 9.2-1

GENERAL NOTES

PROPRIETARY STATEMENT

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TITLE		TANK FARM AREA 4426 ENTREPOT BLVD. TALLAHASSEE, FL. 32310			
SAFETY-KLEEN SYSTEMS, INC.		42 LONGWATER DRIVE, NORWELL, MA. 02061 PHONE: 781-792-5000			
A	ISSUED FOR PERMIT	JEK	JZ	JZ	082924
NO.	DESCRIPTION	BY	CHK	APPR	DATE
TALLAHASSEE, FL		7094-4100-350		A	

**ERM**

Project

Subject

ERM-South, Inc.

Environmental Resources Management

SK- Tallahassee

Available Storage Capacity

Tank Farm Area

Figure 9.2-2

W.O. No. 1311330.29 Sheet 1 of 2

By DS Date 9/16/94

Chkd by RJP Date 9/16/94

III Tank Farm Storage Capacity

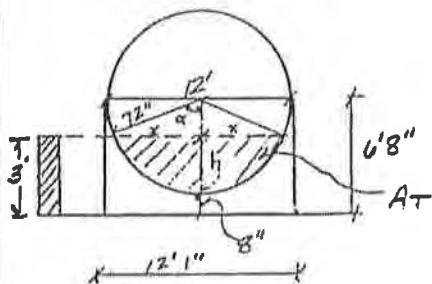
1. Containment Area Volume (V_c) Availability

$$\begin{aligned}
 V_c &= L \times W \times H \\
 &= (5'9\frac{1}{2}")(25')(3')(7.48 \text{ gal/ft}^3) \\
 &= 33,122 \text{ gal}
 \end{aligned}$$

2. Tanks (Qty = 3 tanks @ 15,000 gal each)

(a) Assuming 1 ruptured tank & 2 intact tanks.

Calculate displaced containment volume by 2 intact tanks (below 3' containment wall).



$$\cos \alpha = \frac{6'8" - 3'}{72"} \quad \therefore \alpha = 52.33^\circ$$

$$\sin \alpha = \frac{x}{72} \quad \therefore x = 57 \text{ in.}$$

and $2x = 9.5 \text{ ft}$

$$\begin{aligned}
 A_T &= \frac{h}{65} (3h^2 + 4x^2) \\
 &= \frac{2.33}{6(9.5)} [3(2.33)^2 + 4(9.5)^2] \\
 &= 15.4 \text{ ft}^2
 \end{aligned}$$

$$\begin{aligned}
 S &= 2x \\
 h &= \text{depth of liquid below wall} \\
 &= 3' - 8" = 2.33'
 \end{aligned}$$

$$\begin{aligned}
 V_T &= 2(15.4)(17'3")(7.48 \text{ gal/ft}^3) \\
 &= 3974 \text{ gal}
 \end{aligned}$$

**ERM**

Project

Subject

ERM-South, Inc.

Environmental Resources Management

K. Tallahassee

Available Storage Capacity
Tank Farm Area

Figure 9.2-2

W.O. No. 1311330.29

Sheet 2 of 2

By

DS
RTO

Date

9/16/94

Chkd by

Date

9/16/94

III Tank Farm Capacity (cont)2.(b) Calculate volume displaced by tank saddles (V_{TS})

Qty: 3 saddles per tank, assume 0.5' thick

$$\begin{aligned}
 V_{TS} &= 3 [(Length * height) - A_T] * width \\
 &= 3 [(12'1") (3') - 15.4] (0.5') (7.48 \text{ gal/ft}^3) \\
 &= 234 \text{ gal}
 \end{aligned}$$

For 3 Tanks:

$$V_{TS} = 3 (234 \text{ gal}) = 702 \text{ gal}$$

3. Calculate Volume of Sump (V_s); $Q_T = 1$

$$\begin{aligned}
 V_s &= \pi \frac{d^2}{4} (h) & d = \text{diameter} &= 1'6\frac{1}{2}" \\
 &= \pi \frac{(1'6\frac{1}{2}")^2}{4} (1'6\frac{1}{2}") & h = \text{depth} &= 1'6\frac{1}{2}" \\
 &= 2.88 \text{ ft}^3 (7.48 \text{ gal/ft}^3) = 22 \text{ gal}
 \end{aligned}$$

$$\text{Total Available Storage (V)} = V_C - V_T - V_{TS} + V_s$$

$$V = 33,122 - 3974 - 702 + 22$$

$$V = 28,468 \text{ gal}$$

Conclusion

$$V = 28,468 \text{ gal exceeds single tank capacity (15,000 gal)}$$

Note: Tank farm is enclosed \therefore precipitation not included.

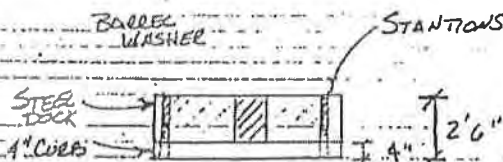
Project 5-K Tallahassee
Subject Available Storage Capacity Cakes

W.D. No. 13/12.29 Sheet 1 of 2
By DS Date 7/14/92
Chkd by VH Date 7/14/92

II. RETURN/FILL SHELTER (FIGURE II.C.9-3)

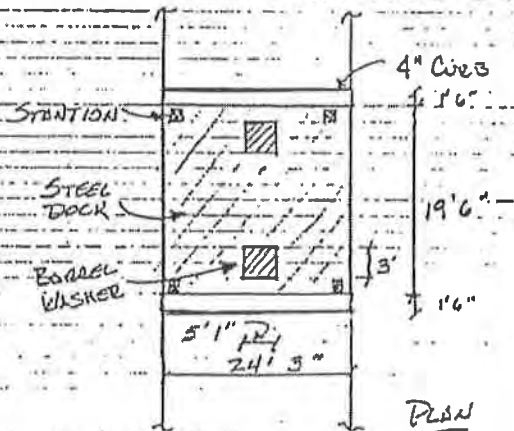
1. Below Grate (Curbed Area)

$$\begin{aligned} V_{BG} &= (19'6" + 1'6" + 1'6") (24'3") (4") \\ &= (22.5') (24.25') (0.33') \\ &= 180.06 \text{ ft}^3 (7.48 \text{ gal/ft}^3) \\ &= 1,346.82 \text{ gal} \end{aligned}$$



2. Barrel Washers ($Qty = 2$):

$$\begin{aligned} V_{BW} &= 2(5'1") (3') (4") \\ &= 2(5.08') (3') (0.33') \\ &= 10.07 \text{ ft}^3 (7.48 \text{ gal/ft}^3) \\ &= 75.29 \text{ gal} \end{aligned}$$



3. Stations

(a) Iron ($Qty = 50$)

$$\begin{aligned} V_{SI} &= 50(1'9\frac{3}{4}") (4") (4") \\ &= 50(1.81') (0.33') (0.33') \\ &= 9.87 \text{ ft}^3 (7.48 \text{ gal/ft}^3) \\ &= 73.82 \text{ gal} \end{aligned}$$

(b) Concrete ($Qty = 8$)

$$\begin{aligned} V_{SC} &= 8(1'10") (5'1\frac{1}{2}") (4") \\ &= 8(1.83') (5.04') (0.33') \\ &= 24.65 \text{ ft}^3 (7.48 \text{ gal/ft}^3) \\ &= 184.37 \text{ gal} \end{aligned}$$



ERM-South, Inc.

Environmental Resources Management

Figure 9.3-2

Project J-R TallahasseeW.O. No. 13112.29 Sheet 2 of 2Subject Available Storage Capacity CalculBy DSDate 7/14/92Chkd by VHDate 7/14/92

RETURN/FILL AREA (CONT)

Available storage in Return/Fill Shilkr. (V):

$$V = V_{BS} - V_{BW} - V_{SI} - V_{SC}$$

$$= 1346.82 \text{ gal} - 75.29 \text{ gal} - 73.82 \text{ gal} - 184.37 \text{ gal}$$

$$V = 1013.34 \text{ gal} \approx 1013 \text{ gal}$$

$$\therefore \text{Allowable storage capacity} = 10,130 \text{ gal}$$

$$\text{w/no single container} > 1013 \text{ gal}$$

Note: Return/Fill area is completely enclosed, therefore, the reduction of storage capacity by the rainfall volume is not applicable.



CO Return and Fill Area

Form Code: 36

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Return and Fill Area Instructions	
Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained. Include any repairs changes or corrective actions.	
CO Return and Fill Area Inspection Items	
Pump Seals - Check for evidence of failure (e.g., leaks, other).	
Pump Motors - Check for evidence of failure (e.g., overheating, other).	
Fittings - Check for evidence of failure (e.g., leaks, other).	
Valves - Check for evidence of failure (e.g., leaks, sticking, other).	
Hose Connections and Fittings - Check for evidence of failure (e.g., cracked, loose, leaks, sticking, other).	
Hose Body - Check for evidence of failure (e.g., crushed, cracked, thin spots, leaks, other).	
Clam Shell Unit Type - Lid Fusible Link - Check for evidence of failure (e.g., broken, spring missing, other).	
Clam Shell Unit Type - Lid Hinge Assembly - Check for evidence of failure (e.g., broken pivot arm, damaged lid arm, missing pins, other).	
Sliding Lid Unit Type - Gaskets - Check for evidence of failure (e.g., broken, cracked distorted, other).	
Sliding Lid Unit Type - Lid/ Slide Assembly -	

Check for evidence of failure (e.g., damaged lid, rollers, slide rail, temperature gauge, limit switches, other).	
Roll-up Door Unit Type - Seals - Check for evidence of failure (e.g., broken cracked, distorted, other).	
Roll-up Door Unit Type - Door/ Roll-up Assembly - Check for evidence of failure (e.g., damaged lid, rollers, slide rail, temperature gauge, limit switch, other).	
Wet Dumpster/Drum Washer - Check for evidence of failure (e.g., leaks, rust, split seems, distortion, deterioration, excess debris, sediment accumulation, other).	
Secondary Containment - Check for evidence of failure (e.g., excess sediment, leaks, distortion, deterioration, excess debris, other).	
Loading/Unloading Area - Check for evidence of failure (e.g., cracks, ponding or wet spots, deterioration, other).	
Satellite Accumulation Containers - Check for evidence of failure (e.g., container open, > 55 gallons, label, other).	
Ventilation Fan - Check for evidence of failure (e.g., inoperative, shutters jammed, other).	
Site Generated Waste - debris, used absorbent, used PPE, aerosols, etc. - Check for evidence of failure. (e.g. waste not containerized, proper storage location, container type, container label, other)	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



CO Tank Systems Inspection

Form Code: 27

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Tank Systems Inspection Instructions	
Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.	
CO Tank Systems Inspection Items	
Tanks - Check for evidence of failure (e.g., leaks, rusty or loose anchoring, distortion, cleanliness, paint failure, other). Insulation - check for any damage or deterioration that may allow moisture intrusion.	
Pipes/Piping Supports - Check for evidence of failure (e.g., leaks, distortion, corrosion, paint failure, other).	
Valves - Check for evidence of failure (e.g., disconnected, corrosion, sticking, leaks, other).	
Fittings/Hose Connections - Check for evidence of failure (e.g., leaks, loose, disconnected, corrosion, other).	
Liquid Level - Check for acceptable level and level gauges working correctly. (e.g., high level max, permitted volume, level gauge legible, other).	
Secondary Containment - Check for interior and exterior for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, corrosion, erosion, other and excess liquid or debris, fire hazards, or other issues).	
Dike drain valves - Are valves closed and in	

good working condition?	
For double-wall tanks is interstitial monitoring equipment in good working condition and is the interstitial space free of liquid?	
Sumps - Check for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, other).	
Bonding and Grounding - Check for evidence of failure (e.g., loose, broken, corrosion or deterioration, other).	
Transfer Equipment/Pump and Pump Motors - Check for availability and condition (e.g., pumps, filters, strainers, hoses, leaks, overheating, other).	
Communication and Alarm System - Check for evidence of failure (e.g., test function, siren, strobe, other).	
Satellite Accumulation Containers - Check for evidence of failure (e.g., container open, >55 gallons, label, other).	
Manways, Hatches, Nipples, Other Openings, Ladders - Check for evidence of failure (e.g., leaks, condition, corrosion, closure, other).	
Pressure Relief Valves (PRV)/ Flame Arrestors - Check for evidence of failure (e.g., condition, corrosion, other).	
Tanks marked with the words "Hazardous Waste" or "Used Oil" - Check for appropriate markings.	
Tanks not used marked as "Out of Service" - Check for appropriate markings.	
Tanks marked as to the contents - Check for appropriate markings (e.g., "Used Oil", "Non-Haz Only").	
Monitoring Equipment/Level Indicators/Overfill Prevention Equipment - Check that equipment is in good working condition or for evidence of failure (e.g., actuate equipment/alarms to	

confirm operation, pressure and temperature gauges, level indicators, sticking, condensation, disconnected, other).	
Loading/ Unloading Areas - Check condition of area (e.g., no free liquid, ponding or wet spots, available spill equipment, spill equipment location, spill kit supply and inventory is adequate, containment deterioration, leaks, pad condition, valve access box, housekeeping, other).	
Tank System Safety - Is the system free of any conditions that need to be addressed for continued safe operation?	
Connection Box/Drip Trays and Buckets - Are the connection box and all drip trays and buckets free of liquids or saturated absorbents, and all material properly collected and disposed?	
Site Generated Waste - debris, used absorbents, used PPE, aerosols, etc. - Check for evidence of failure (waste not containerized, proper storage location, container type, container label, other).	
Spill Equipment - Check that spill equipment is available, at the correct location, equipment supply and inventory is adequate, equipment is in good condition clean and ready for use.	
Ladders/platforms/walkways/egress pathways on or within tank or containment - Check for evidence of damage, corrossions, proper opration, pathways clear, doors/gates operable.	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	

Safety-Kleen Systems

Tallahassee, FL

Internal Inspection

T-2

Inspection Date: 2/21/2024



Company Confidential

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Tank Data			
Design Standard:	UL	Nominal Diameter:	12'
Build Date:	1998	Nominal Length:	18'
Manufactured By:	No Data Available	Material:	Steel
Orientation:	Horizontal	Continuous Release Detection Method (CRDM):	Elevated
Release Prevention Barrier:	Concrete	Spill Control:	Secondary Containment AST

SUMMARY**Conclusion:**

As determined by the condition found during the inspection of tank# T-2, the tank appears to be in fair condition at the time of this inspection.

Recommendations:

- Monitor areas with corrosion/pitting at the next available inspection.

Next External Inspection

5 Years

Next Internal Inspection

10 Years

Corrosion Rate

Course	Nominal Thickness (in.)	Current Thickness (in.)	Corrosion Rate (in./yr.)
1	0.250	0.244	0.0002
2	0.250	0.245	0.0002
3	0.250	0.245	0.0002

***The above calculations are based on the average measured thickness and previous thickness. If there is no previous measured thickness, then an assumed thickness is utilized to establish a corrosion rate. The assumed thickness is based upon industry standard thickness for rolled plate steel. Remaining life could not be determined on courses where the current thickness is greater than or equal to the previous thickness.**

***It should be noted that without established Condition Monitoring Location (CML) points, data collection locations may vary between inspections.**

EXTERNAL VISUAL INSPECTION					
Foundation		General Condition			
Item	Acc	Fin	N/I	N/A	Comments
Coating condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Concrete condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Containment / Dike walls	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Elastomeric Liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Site Drainage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Equipment Support		General Condition			
Item	Acc	Fin	N/I	N/A	Comments
Coating	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Coating failure
Concrete Pad	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Corrosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Fireproofing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Outer Shell		General Condition			
Item	Acc	Fin	N/I	N/A	Comments
Attachments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Bottom Projection Plate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Coating Condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Deformation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Insulation Support Bands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Atmospheric Venting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Overfill Protection	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Attached Piping	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Repair(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Vegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Weather Jacket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Condition Monitoring Locations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Manways / Nozzles		General Condition			
Item	Acc	Fin	N/I	N/A	Comments
Bolting Condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Coating Condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Flange Condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reinforcement Pad Condition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

EXTERNAL VISUAL INSPECTION CONTINUED					
Head/End	General Condition				
Items	Acc	Fin	N/I	N/A	Comments
Coating Condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Weather Jacket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Appurtenances	General Condition				
Items	Acc	Fin	N/I	N/A	Comments
Anchors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Temperature Gauges, Sight Glass (damage)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Corrosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Grounding Cable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Liquid Level Gauge	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Data Plate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

INTERNAL VISUAL INSPECTION					
Shell	General Condition				
Item	Acc	Fin	N/I	N/A	Comments
Cleanliness	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Scattered corrosion on tank bottom ranging from 0.005" to 0.017" in depth.
Liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Head/End	General Condition				
Item	Acc	Fin	N/I	N/A	Comments
Liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Corrosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Nozzles, Man Ways and Attachments	General Condition				
Item	Acc	Fin	N/I	N/A	Comments
Baffles	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Down comer(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Internal coils	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Level Float	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mixers, agitators	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Thermowell(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Thickness Data:

	Top	Bottom	North	South
First Course	N/A	0.241"	0.246"	0.240"
	N/A	0.242"	0.247"	0.241"
	N/A	0.244"	0.248"	0.243"
Second Course	N/A	0.244"	0.245"	0.245"
	N/A	0.244"	0.246"	0.245"
	N/A	0.246"	0.247"	0.246"
Third Course	N/A	0.245"	0.243"	0.245"
	N/A	0.246"	0.243"	0.245"
	N/A	0.247"	0.244"	0.246"

Course 1		Course 2	
Minimum	0.240"	Minimum	0.244"
Average	0.244"	Average	0.245"
Maximum	0.248"	Maximum	0.247"
Standard Deviation	0.003"	Standard Deviation	0.001"

Course 3	
Minimum	0.243"
Average	0.245"
Maximum	0.247"
Standard Deviation	0.001"

	Top	Bottom	North	South
East Head	N/A	0.244"	0.247"	0.247"
West Head	N/A	0.243"	0.246"	0.245"

	12 o'clock	6 o'clock
Manway H	0.232"	0.233"

Photographs



Photographs



Inspection Certification Certificate

Marcos Rosario under direct supervision of Taylor Sudol (Certified Inspector) has performed an In-Service Inspection of tank# T-2. The tank is located at the Safety-Kleen Systems facility in Tallahassee, FL. As determined by the condition found during the inspection of tank# T-2, the tank appears to be in fair condition at the time of this inspection. Facility personnel should perform periodic inspections in accordance with API 653.

The services performed, documentation of inspection, identification of deterioration, and the generation of a report was performed within the generally accepted principles and practices of API 653 and/or STI/SPFA SP001, Clean Harbors' Written Practice and Inspection procedures.



Taylor Sudol
API 653# 56977
STI SP001# AC44096

WARRANTY

Clean Harbors Inspection Services, USA. ("Company") has performed inspection services on equipment designated by Safety-Kleen Systems (owner/operator) and has evaluated its condition based on observations and measurements made by Company's inspectors. While our evaluation accurately describes the condition of the equipment at the time of inspection, the owner/operator must independently assess the inspection information/report provided by Company and any conclusions reached by owner/operator and any action taken or omitted to be taken are the sole responsibility of the owner/operator. With respect to inspection and testing, Company warrants only that the services have been performed in accordance with accepted industry practice. If any such services fail to meet the foregoing warranty, Company shall re-perform the service to the same extent and on the same conditions as the original service.

Company makes no warranty, express or implied, regarding goods or services provided by Company other than those warranties set forth herein. The preceding paragraph sets forth the exclusive remedy for claims based on failure or of defect in materials or services, whether such claim is made in contract or tort (including negligence) and however instituted, and, upon expiration of the warranty period, all such liability shall terminate. The foregoing warranty is exclusive and in lieu of all other warranties, whether written, oral, implied or statutory. NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE SHALL APPLY, nor shall Company be liable for any loss or damage whatsoever by reason of its failure to discover, report, repair or modify latent defects or defects inherent in the design of any equipment inspected. In no event, whether a result of breach of contract, warranty or tort (including negligence) shall Company be liable for any consequential or incidental damages including, but not limited to, loss of profit or revenues, loss of use of equipment tested or services by Company or any associated damage to facilities, down-time costs or claims of other damages.

API INDIVIDUAL CERTIFICATION PROGRAMS



verifies that

Taylor Sudol

HAS MET THE ESTABLISHED AND PUBLISHED REQUIREMENTS FOR API CERTIFICATION AS AN
API 653 ABOVEGROUND STORAGE TANK INSPECTOR

IN ACCORDANCE WITH THE KNOWLEDGE DEFINED IN THE **API Standard 653**

CERTIFICATION NUMBER **56977**

ORIGINAL CERTIFICATION DATE	January 31, 2015
CURRENT CERTIFICATION DATE	January 31, 2021
EXPIRATION DATE	January 31, 2024

Manager, Individual Certification Programs



CERTIFICATION

Steel Tank Institute

Taylor Sudol

STI Inspector No: **AC 44096**

Expires: **September 1, 2025**

The person whose name appears on this certificate has met all of the requirements to attain the STI SP001 Adjunct Certification for API 653 Inspectors.

This certification is dependent on an active API 653 certification.



Joseph Mentzer, P.E.
Steel Tank Institute



The official status of this certificate can be verified at www.steeltank.com.

Issue Date:
09/01/2020

Tab 7

Part II.I

Miscellaneous Units

Part II

I. Miscellaneous Units

1. Description of Miscellaneous Unit

The wet dumpster/drum washer unit at the facility is managed under the Subpart X – Miscellaneous Units Standards of 40 CFR Part 264.600. The unit is located, designed, constructed, operated and maintained in a manner to protect human health and the environment. The unit is specifically located within the Return/Fill Shelter and sits on top of the raised steel grated dock, and area provided with secondary containment, as described in Part II.C, to prevent any potential releases from migrating to the surrounding subsurface or groundwater.

1.a The unit is constructed of steel and the dimensions are approximately: H – 5’ 7”, L – 5’ 6”, W – 3’. Engineering drawings providing detailed information for the unit is found at the end of this section. It is basically a large rectangular steel box with a clam shell type lid that is manually opened upward when in use.

1.b The wet dumpster/drum washer unit is designed to allow employees to manually empty used parts washer solvent containers into the dumpster, then place the containers on roller brushes contained within the unit for rinsing. An internal spray system is turned on, and the containers rotate on the brushes where used parts washer solvent is recirculated for cleaning the inside and outside of the containers. This process takes approximately five (5) seconds per container. The containers sit in the unit for a short period of time so any residual solvent is allowed to drop back into the unit. During the dumping process the used parts washer solvent is transferred to the RCRA-Permitted Hazardous Waste Tank (Used Solvent) via an automatic float switch pump which is activated as the used parts washer solvent fills at the bottom of the unit. Once cleaned, the containers are filled with clean recycled parts washer solvent. As designed and utilized, this unit is simply a device used to effectively convey the contents of a used parts washer solvent container to the on-site RCRA-Permitted Hazardous Waste Tank (Used Solvent). The wet dumpster/drum washer unit is not designed or intended to contain an accumulation of hazardous waste. The unit operates at ambient pressure and temperature. When not actively being used to received used parts washer solvent and wash containers, the unit will be maintained in a closed position. The internal sump at the bottom of the unit will be emptied at the end of each day’s operating shift.

The unit will be inspected each operating day using Form CO Return and Fill Area, which is found in Part II.C of this permit application. Items for inspection are:

- Pump seals & pump motors
- Fittings, valves, hose connections, & hose body
- Clam Shell Unit Type – check fusible link for failure (e.g., broken, spring missing, other), lid hinge assembly (e.g., broken pivot arm, damaged lid arm, missing pins, other).
- Wet Dumpster/Drum Washer – check for evidence of failure (e.g., leaks, rust, split seams, distortion, deterioration, excess debris, sediment accumulation, etc.)
- Secondary Containment – check for excess sediment, standing liquid that may indicate leak(s), distortion, deterioration, excess debris, damage, etc.).
- Loading/Unloading Area – check for cracks, ponding or wet spots, deterioration, etc.)
- Satellite Accumulation Container – check for container integrity, placement, proper labeling/markings, closed when not adding or removing waste material, etc.

If a leak is detected from a wet dumpster/drum washer unit, the defect causing the leak will be repaired no later than 45 days from the date of detection. First attempts to repair the unit will occur within five (5) days after leak detection.

Closure information for this unit and the Return/Fill Shelter is found in Part II.K of this permit application.

The physical properties and chemical characteristics of the used parts washer solvent transferred through this unit, and waste materials generated in the drum cleaning operation are found in Part II.A.5 of this permit application.

- 1.c*** The wet dumpster/drum washer unit is not a disposal unit, however; if future conditions show that contaminated soils cannot be completely removed or decontaminated during closure, the unit will meet the requirements of 264.601 during post-closure care. A plan to perform post-closure care in accordance with 264.118 will be prepared for implementation upon FDEP approval.

2. *Environmental Performance Standards for Miscellaneous Units*

The wet dumpster/drum washer unit operated by the Safety-Kleen Tallahassee branch are not equipped with active emission control systems. As part of the company's overall emission inventory and assessment program, emission sources at the branch facilities, including the wet

dumpster/drum washer unit has been evaluated to determine whether the facilities should be considered sources requiring air permits. Based on this evaluation they should be considered minor sources and not require emission control permits. The reasons for the low emission levels are fourfold. First, the solvent managed at the facility, especially in those areas of maximum potential emission (i.e., wet dumpster/drum washer and bulk storage tanks, have a relatively low vapor pressure of 0.2mm-Hg at 68° F or 0.6mm Hg at 100° F). Secondly, the wet dumpster/drum washer unit is operated in such a manner as to minimize the potential for emissions to greatest extent practicable during unloading the used parts washer solvent into the unit. Third, the volume of the used parts washer solvent present in the wet dumpster/drum washer unit between unloading operations, approximately 2-3 gallons, is minimized and lids of the unit remains closed when used parts washer solvent is not being added or when empty drums are not being cleaned. Finally, containers are filled with clean solvent using a gasoline type dispenser that extends to the bottom of the container. This minimizes any splashing that may occur during the filling operation.

Safety-Kleen has conducted Industrial Hygiene Hazard Assessments of the emissions produced by the operation of the wet dumpster/drum washers and other sources located at a typical branch. These assessments were conducted for a number of reasons. The most important is to determine the presence of any unacceptable work place exposure regarding the protection of company employees who work directly over the process area as containers are being emptied, cleaned and refilled with clean solvent. Based on Industrial Hygiene studies performed at various Safety-Kleen branches/facilities, results do not indicate any unacceptable work place exposure. As would be expected, solvents and related compounds have been detected during sampling events, but in concentrations will below American Conference of Governmental Industrial Hygienist (ACGIH) threshold limit values (TLV) and the Occupational Safety and Health Administration's (OSHA) Permissible Exposure Limits (PEL) for the various chemical compounds encountered. A sample of the data collected by the company's Certified Industrial Hygienist is included at the end of this section.

Based on the above information there would not be any tangible environmental benefit to adding pollution controls to the wet dumpster/drum washer units. In addition, developing pollution controls would be very difficult since processing containers of used parts washer solvent requires that the lids to the unit remain open during active operation, and the unit is located over an open grated working surface provided with a concrete secondary containment system. It should also be

noted that the wet dumpster/drum washer unit is drained and closed during those times of the operating day when no trucks are delivering used parts washer solvent to be processed. Also, at the end of each operating day, which typically consists of 2.5 – 4 hours of processing, the wet dumpster/drum washer unit is emptied, cleaned and closed to prepare for the next day's operation. These procedures provide an additional amount of risk reduction.

3. The potential pathways of exposure of humans to hazardous waste or hazardous waste constituents from the wet dumpster/drum washer would be through skin contact (absorption), or inhalation. Employees operating the unit are required to use the following Personal Protective Equipment (PPE) at all times to reduce and/or eliminate exposure:

- Gloves – cut resistant (outside), and supported neoprene (inside)
- Hearing protection – required when using pneumatic tools for drum closure or opening
- Footwear – steel toed boots with metatarsals and slip resistant soles
- Tychem QC apron with sleeves
- Hard Hat
- Safety glasses with side shields
- Safety-Kleen issued work uniform
- In addition, all material handlers are issued respirators and fit tested annually. It is not a requirement to use respiratory protection during operation of the unit, but any employee may choose to do so.

The potential pathways of exposure of environmental receptors to hazardous waste or hazardous waste constituents would through emissions or release of material from the unit. Emissions from the unit has been discussed above. In addition, release protection has been discussed. The unit is located inside an enclosed building with sufficient secondary containment to mitigate a release of material. In addition, the capacity of the unit is minimal compared to the secondary containment capacity in the Return/Fill Shelter, the unit is inspected each operating day for leaks, deterioration, or damage, and employees are trained to respond to any spill or release from this unit immediately.

To: Ed Krise
From: Troy W. Timothy, MS, CIH, CSP
RE: Industrial Hygiene Survey
Date: November 21, 2019

Enclosed is a copy of the report summarizing the Industrial Hygiene monitoring conducted March through September, 2019 at various Safety-Kleen location. If you have any questions or need additional information, please contact me at (435) 843-4848.

cc:

INTRODUCTION AND SUMMARY

Industrial Hygiene monitoring was performed at various Safety-Kleen branches between March 5th - September 25th, 2019. 20 personal air samples were collected from 11 different branches. Generally, there was one SSR and one Material Handler selected from each branch. There were no personal exposures measured above 3% of the OEL during this survey.

METHODOLOGY

The air sample was collected and analyzed following NIOSH method 1501. The sample was collected using 3M Passive Organic Vapor Monitors. The analytes were desorbed using carbon disulfide. The samples were then analyzed on a Hewlett-Packard Gas Chromatograph. Analysis was conducted at Galson Laboratories. Galson is an AIHA accredited laboratory located in East Syracuse New York.

RESULTS

Detailed results for each sample can be found at the end of the report. Below is a summary of the findings.

Safety-Kleen Branch Sampling

Date	Employee Name	Branch	Job Task	Results
3/5/19	Rick Mandeville	St. Charles, MO	SSR	< 1% all OEL's
3/5/19	Domonique Elkins	St. Charles, MO	MH	< 1% all OEL's
3/19/19	Connor Wentz	Independence, MO	MH	< 1% all OEL's
3/19/19	Joe Taylor	Independence, MO	SSR	< 1% all OEL's
5/21/19	Al Fuller	Saginaw, MI	SSR	< 1% all OEL's
5/21/19	Morgan Hayes	Saginaw, MI	MH	< 1% all OEL's
5/14/19	Ryan Pendergrass	Dolton, IL	SSR	< 1% all OEL's
5/14/19	Mike Brechbill	Dolton, IL	SSR	< 1% all OEL's
4/30/19	Mark Houle	Blaine, MN	SSR	< 2% all OEL's
4/30/19	David Kerns	Blaine, MN	MH	< 1% all OEL's
6/4/19	Josh Kuck	Grand Island, NE	SSR	< 3% all OEL's
6/4/19	Mike Bergholz	Grand Island, NE	MH	< 1% all OEL's

6/11/19	Emir Rosic	Des Moines, IA	MH	< 1% all OEL's
6/11/19	Ben Angerstein	Des Moines, IA	SSR	< 2% all OEL's
7/9/19	Craig Thompson	Champaign, IL	*UR	< 2% all OEL's
8/13/19	Andrew Belanger	Romulus, MI	*UR	< 2% all OEL's
8/13/19	Steve Beadle	Romulus, MI	SSR	< 2% all OEL's
9/24/19	Ken Wilson	Wichita, KS	UR	< 1% all OEL's
9/25/19	Matt Newby	Mason, MI	SSR	< 1% all OEL's
9/25/19	Denis Pulver	Mason, MI	SSR	< 1% all OEL's

*UR - Utility Rep (performs both MH duties and SSR duties).

DISCUSSION

20 personal air samples were collected from 11 different branches. Generally there were two samples collected from each branch; one SSR and one Material Handler. There were no exposures measured above 3% of the OEL during this survey.

RECOMMENDATIONS

The recommendations are as follows:

1. PPE requirements should remain unchanged.
2. Additional air monitoring should be conducted when any changes are made to the current process that could increase the employee's exposure.

If there are any questions, please call me at (435) 843-4848.

RESULTS

Sample of Rick Mandeville - SSR out of St. Charles, MO			
Date: March 5, 2019			
Time: 480 minutes			
Sample ID: VX 9493			
Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	0.1	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Domonique Elkins - Material Handler out of St. Charles, MO

Date: March 5, 2019
 Time: 480 minutes
 Sample ID: VX 9509

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	0.54	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Conner Wentz - Material Handler out of Independence, MO

Date: March 19, 2019

Time: 480 minutes

Sample ID: VX 9498

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Joe Taylor - SSR out of Independence, MO

Date: March 19, 2019

Time: 480 minutes

Sample ID: VX 9511

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Al Fuller - SSR out of Saginaw, MI

Date: May 21, 2019

Time: 480 minutes

Sample ID: VX 9682

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Morgan Hayes - Material Handler out of Saginaw, MI

Date: May 21, 2019
 Time: 480 minutes
 Sample ID: VX 9699

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	0.2	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Ryan Pendergrass - SSR out of Dolton, IL

Date: May 12, 2019
 Time: 480 minutes
 Sample ID: VX 9670

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Mike Brechbill - SSR out of Dolton, IL

Date: May 14, 2019

Time: 480 minutes

Sample ID: VX 9726

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Mark Houle - SSR out of Blaine, MN

Date: April 30, 2019

Time: 480 minutes

Sample ID: VX 9523

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	2.1	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	0.59	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	0.2	20	1
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of David Kerns - Material Handler out of Blaine, MN

Date: April 30, 2019

Time: 480 minutes

Sample ID: VX 9744

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	0.54	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Josh Kuck - SSR out of Grand Island, NE

Date: June 4, 2019

Time: 480 minutes

Sample ID: VX 9675

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	0.25	10	3
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Mike Bergholz - Material Handler out of Grand Island, NE

Date: June 4, 2019

Time: 480 minutes

Sample ID: VX 9782

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Ben Angerstein - SSR out of Des Moines, IA

Date: June 11, 2019
 Time: 480 minutes
 Sample ID: VJ 4062

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	0.88	50	2
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Emir Rosic - Material Handler out of Des Moines, IA

Date: June 11, 2019

Time: 480 minutes

Sample ID: VW 6883

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	0.07	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Craig Thompson - Utility Rep (performs both MH duties and SSR duties) out of Champaign / Urbana IL.

Date: July 9, 2019

Time: 480 minutes

Sample ID: VJ 3932

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	6.0	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	0.8	50	2
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Andrew Belanger - Utility Rep (performs both MH duties and SSR duties) out of Romulus, MI.

Date: August 13, 2019

Time: 480 minutes

Sample ID: VJ 3982

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	0.8	50	2
Toluene	0.18	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Steve Beadle - SSR out of Romulus, MI.

Date: August 13, 2019

Time: 480 minutes

Sample ID: VJ 3992

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	1.7	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	0.18	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	0.8	50	2
Toluene	0.37	20	2
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Ken Wilson - Utility Rep (performs both MH duties and SSR duties) out of Wichita, KS.

Date: September 24, 2019

Time: 480 minutes

Sample ID: VJ 3991

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Matt Newby - SSR out of Mason, MI.

Date: September 25, 2019

Time: 480 minutes

Sample ID: VJ 3824

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	ND	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

Sample of Denis Pulver - SSR out of Mason, MI.

Date: September 25, 2019

Time: 480 minutes

Sample ID: VJ 4036

Analyte	8-hour TWA (ppm)	OEL (ppm)	% of OEL
1,1,1-Trichloroethane	ND	350	--
1,1,2-Trichloroethane	ND	10	--
1,1-Dichloroethane	ND	100	--
1,2-Dichloroethane	ND	10	--
Acetone	ND	500	--
Benzene	ND	0.5	--
Chlorobenzene	ND	10	--
Chloroform	ND	10	--
Cyclohexane	ND	100	--
Ethyl Alcohol	2.7	1000	--
Ethyl Benzene	ND	100	--
Isopropyl Alcohol	ND	200	--
Dichlorobenzene	ND	10	--
Methylene Chloride	ND	25	--
Methyl Ethyl Ketone	ND	200	--
Methyl Isobutyl Ketone	ND	50	--
n-Butyl Acetate	ND	150	--
n-Hexane	ND	50	--
Pentane	ND	600	--
Styrene	ND	20	--
Tetrachloroethylene	ND	25	--
Tetrahydrofuran	ND	50	--
Toluene	ND	20	--
Trichloroethylene	ND	10	--
Vinyl Toluene	ND	50	--
Xylene	ND	100	--

-- - below 1 %

ND – Not Detected

FRAMING RAISED FOR CLARITY

LINER RAISED FOR CLARITY

15" x 19" HOLE ON DUMPSTER WALL

SOUTHWEST INDUSTRIAL
CONSTRUCTORS, INC.

DATE: 1/19/70
JOB NO.:
OWN: ALI
CMT:

SAFETY - KLEEN
DRUM WASHER

SHEET NO.

1

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Tab 8
Part II.K
Closure Plan

Part II

K. CLOSURE PLAN

Safety-Kleen constructed the Tallahassee Branch with the intent that it will be a long-term facility for the distribution of Safety-Kleen products. No on-site disposal activity occurs at the facility and, hence no disposal capacity will be exhausted that will necessitate closure of the facility. Based on current business and facility conditions, the Tallahassee facility will remain in operation for many years to come. In the event that some presently unforeseen circumstance(s) would result in the discontinuance of operations and permanent closure or sale of the facility, this closure plan identifies the steps necessary to close the facility at any point during its intended life. This plan should be applied to the tanks system, container storage areas, and equipment used by the facility for hazardous waste management to accomplish the closure performance standard of 40 CFR 264.111. It is intended that all closures will be complete and final with removal of waste and decontamination of the facility and associated equipment. This will eliminate the need for maintenance after closure and the possibility of escape of hazardous waste constituents into the environment. Because closure is not anticipated for some time Safety-Kleen agrees to notify the Department when this decision is made to work with FDEP to update the closure plan using the most current requirements and FDEP guidance documents.

FACILITY DATA

1. Waste Management Facility Descriptions

- a. RCRA-Permitted Hazardous Waste Tank (Used Solvent): The tank is a 15,000-gallon steel tank. This tank is located within a containment system consisting of a 25' x 59.5' foundation slab with 3' perimeter walls.
- b. Solvent Return/Fill Shelter: The shelter is a 45' x 44' concrete portion of the building located between the warehouse and paint waste shelter. It contains one wet dumpster. The one active dumpster is used to receive returned solvent from containers and pump it to the used parts washer solvent tank. This dumpster is not intended for storage but can hold a max. of 75 gallons each.
- c. Container Storage Area: The container storage area is a 47'7" x 78' 6" concrete area, and one collection trench with a combined containment capacity of 2,593.7-gallons. The maximum storage capacity of this area is 25,937-gallons with 6,912-gallons being hazardous waste. Containerized waste to be

stored in this area will consist of used oil filters, paint wastes, branch generated debris, dry cleaning waste, spent immersion cleaner, and any overflow transfer waste if necessary.

2. Maximum Inventory of Wastes

- a. Used Parts Washer Solvent: 15,000 gallons
- b. Wet Dumpsters: 75 gallons
- c. Containerized Waste: 6,912 gallons in the container storage area. (Note: This includes any combination of 5, 16, 30, 55, 85-gallon containers, and 330-gallon totes used for various management purposes).

All wastes will be disposed offsite in accordance with appropriate hazardous waste regulations.

CLOSURE PROCEDURES

Container Storage Areas

- At closure, all containers present at the facility will be sent to a Safety-Kleen or Clean Harbors TSDF or permitted third party facility where the contents in the containers will be reclaimed and the containers cleaned for reuse. The containers will be removed and transported with proper packaging, labeling, and manifesting.
- The concrete floor, spill containment area, and walls will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. Final rinsate samples will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, rinsate samples will be collected from the container storage area. The rinsate samples will be analyzed by EPA method 6010 for the eight RCRA metals (EPA Method 7471B for mercury) and nickel, and for volatile and semi-volatile organics by EPA methods 8015, 8260, and 8270. The area will be decontaminated to meet FDEP's guidance at the time of closure. Decontamination of the mercury-containing lamps and devices storage area will be conducted at the time of closure as part of the overall decontamination of the container storage areas.

- Decontamination (i.e., detergent wash and clean rinse) fluids will be collected and contained for proper management. One representative sample of the contained fluids will be collected to determine whether the water is hazardous. This determination will be made by laboratory analysis of the sample for the metals and organics (excluding pesticides/herbicides) on the TCLP list. (Note: This wash water will be from all areas undergoing decontamination, not just from the container storage areas.)
- If the wash water or other wastes generated in the closure process are determined to be hazardous, they will be disposed of properly as a hazardous waste. Otherwise, the material will be disposed of as an industrial waste. Assumptions of wash water generation are based on Safety-Kleen's past experience from other facility closures. The generated wash water is expected to be non-hazardous based on Safety-Kleen's experience from other facility closures.
- Equipment to be used to clean this area includes mops, pails, scrub brushes, a wet/dry vacuum, and containers. The mops, pails, and scrub brushes will be containerized and disposed of as hazardous waste. The wet/dry vacuum and containers used will be washed with a detergent solution and rinsed to decontaminate them.

Solvent Return/Fill Station

- At closure, any sludge in the wet dumpsters ("dumpster mud") will be cleaned out and containerized, labeled, and manifested for proper disposal.
- The metal superstructure components of the station (i.e., the wet dumpsters and the dock grating) will be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle these components as scrap metal in accordance with 40 CFR 261.6(a)(3)(ii), or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of the components is required only to the extent necessary for safe demolition, storage, and transportation of the scrap.
- The concrete floor in the return/fill station will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the

container storage area rinsate sample. The area will be decontaminated to meet FDEP's guidance at the time of closure.

Aboveground Storage Tank System

Note: The product solvent & used oil tanks will be closed in accordance with Chapter 62-762, F.A.C.

Metal Components of the Tank Storage System

- At closure, the contents of the tank will be removed to a tanker truck using existing unloading equipment and subsequently transported to a Safety-Kleen recycle center, or 3rd party facility.
- Once the contents have been drained, the tank will be opened by removing the manways and vented by supplying fresh air to the interior space of the tank. Any residual wastes will be removed via vacuum for recycling with the previously drained wastes.
- The interior of the tank as well as all associated piping and appurtenant equipment will then be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle the tank, piping, and appurtenant equipment as scrap metal in accordance with 40 CFR 261.6(a)(3)(ii), or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of the metal components is required only to the extent necessary for the safe demolition, storage, and transportation of the scrap.

Concrete Containment System

- Final disposition of the concrete containment system where the RCRA-Permitted Hazardous Waste Tank (Used Solvent) is located will depend in part upon the presence or absence of underlying soil contamination. To make that determination, the upper six inches of soil immediately below the concrete slab will be sampled at the following locations, as follows:
 1. Under the RCRA-Permitted Hazardous Waste Tank (Used Solvent), and at the containment system sumps;
 2. Beneath the most prominent of any cracks observed in the slab, and under the tanker connections.
- Sampling locations, and the number of samples required will ultimately be determined after consultation with the Department

- These sample locations may be adjusted as actual field conditions warrant, but a minimum of two samples will be retrieved. A soil sample will also be taken from the area where non-sheen stormwaters from the secondary containment area were discharged. These samples will be analyzed for petroleum constituents, and by EPA Method 6010 for the eight RCRA metals (EPA Method 7471B for mercury), and for volatile and semi-volatile organics by EPA Methods 8015, 8260, and 8270.
- The perimeter walls and foundation slab of the secondary containment area will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the container storage area rinsate sample. The area will be decontaminated to meet FDEP's guidance at the time of closure. Safety-Kleen anticipates that proper maintenance of the concrete containment system will allow the slab to remain in place at closure. If the slab is removed clean debris requirements of Rule 62-701.200, F.A.C. may be met depending on final use.
- If required, Safety-Kleen will proceed with demolition of the perimeter walls. If it is determined that soil contamination exists beneath the foundation slab, Safety-Kleen will demolish the entire concrete structure and complete a further delineation of the extent of soil contamination to be removed to complete closure. Any site assessment, interim measures, or corrective action that may be required will be conducted in accordance with Chapter 62-780, F.A.C. and permit requirements.
- Prior to demolition of the perimeter walls, one representative composite sample of the construction materials will be collected and submitted for analyses (by TCLP) of metals and organics (excluding pesticides and herbicides) unless an alternate analytical protocol is required by the selected disposal facility. The representative composite sample will include biased grab samples collected from areas of staining. If no stained areas are evident, the grab sample locations will be randomly selected. If the construction materials are classified as non-hazardous using TCLP, then they will be disposed of as construction debris in an appropriately permitted disposal facility. In the event the construction materials

are identified as hazardous using TCLP, the construction materials will be disposed of as a hazardous waste in accordance with RCRA regulations.

- If the foundation slab must be removed, it will be demolished and the construction materials tested using TCLP in the same manner as that described above for the walls of the secondary containment system.
- If soil removal becomes necessary, Safety-Kleen will backfill the excavated area with clean, compacted general fill material graded to match existing surfaces and to preclude ponding of water. To ensure backfill is clean (i.e., is not contaminated with constituents at concentrations above Florida soil cleanup goals or site background (whichever is higher)), one representative composite sample of the backfill sample will be analyzed by EPA Method 6010 for the eight RCRA metals (EPA Method 7471B for mercury) and nickel, and by EPA Methods 8015, 8260, and 8270.

All sampling and analyses will be done in accordance with FDEP Standard Operating Procedures (SOPs).

FACILITY CLOSURE SCHEDULE AND CERTIFICATION

- Safety-Kleen may amend the closure plan at any time during the active life of the facility. The active life of the facility is that period from initial receipt of hazardous waste to certification of final closure. Safety-Kleen will amend the plan any time changes in operating plans or facility design affect the closure plan or whenever a change occurs in the expected year of closure of the facility. The plan will be amended within 60 days of the changes.
- Safety-Kleen will notify the FDEP of its intent to close the facility in accordance with Chapter 62-730.240, F.A.C.
- Safety-Kleen will remove from the site all hazardous wastes in accordance with the approved closure plan. The Regional Administrator may approve a longer period if Safety-Kleen demonstrates that:

The activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete; or

1. The following requirements are met:

- a) The facility has the capacity to receive additional wastes;
 - b) There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
 - c) Closure of the facility would be incompatible with continued operation of the site; and
 - d) Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.
- Safety-Kleen will complete closure activities in accordance with the approved closure plan within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, whichever is later. When closure is completed, all facility equipment and structures shall have been properly disposed of or decontaminated by removing all hazardous waste and residues.
 - Within 60 days of closure completion, Safety-Kleen will submit certification by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

Figure 10.3-1 presents a typical closure schedule anticipated for the Tallahassee facility.

CONTINGENT POST-CLOSURE PLAN

The tank system at the Tallahassee facility meets the secondary containment requirements of 40 CFR 264.193, and is, therefore, not required to have a contingent post-closure plan under 40 CFR 264.197(c). In addition, Safety-Kleen intends to remove or decontaminate all tank system components, associated containment systems, and contaminated soils (if any) at the time of closure. However, should future conditions indicate that all contaminated soils and tank system components cannot practicably be decontaminated or removed, then a plan to perform post-closure care in accordance with the post-closure care requirements that apply to landfills (40 CFR 264.310) will be prepared for implementation upon FDEP approval.

CLOSURE COST ESTIMATE

The cost for closure of the facility is estimated in the CCE worksheets and summarized as follows:

• Inventory Removal	\$41,896
• Storage Tank Decontamination	\$12,395
• Decontaminate the Return/Fill Station	\$10,702
• Decontaminate Container Storage Area	\$12,105
• Containerize, Stage, Transport and Dispose of Decon Wastes	\$17,717
• Closure Certification Report	\$12,354
Subtotal	\$107,169
2023 Total CCE with Inflation	\$148,020
15% contingency	\$22,202
2023 Total CCR with Inflation and Contingency	\$170,222

		Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
Activity	Category			
1. INVENTORY REMOVAL				
<u>Assumptions</u>		Capacity (gallons)		
- Waste mineral spirits tank(s) is full			15000	
- Tank One			0	
- Tank Two (IF APPLICABLE)			15000	
	Total Tank Capacity			
- Return/Fill station is full				
- Maximum capacity of drum washers added to waste mineral spirits tank quantity			75	
- Container storage area(s) full				
- CSA 1			6912	
- CSA 2 (IF APPLICABLE)			0	
	Total CSA Capacity		6912	
<u>Subcontractor Costs</u>				
- Transfer tank contents to tankers				
Tank Capacity (total gallons)			15075	
Work Rate to Unload Tank Capacity (hours per gallon)			0.0003	
Total Hours to Unload			4.5	
Labor and equipment rate to unload (PPE Level D) and cost	Labor/equipment	\$175.95	4.5	\$796
- Transport waste mineral spirits to a TSD for treatment/disposal				
Number of tanker trailers required (6,000 gallons max each load)			3	
Cost per mile =\$5.64/mile				
Mileage = 500 miles (Number in second column is 500 miles x number trucks)	Transport = 500 miles each	\$5.64	2000	\$11,280
Disposal/treatment cost (per gallon - low cost based on suitability for fuel)	TSD @\$0.45/gallon	\$0.450	15075	\$6,784
- Transfer drums from CSA(s) to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	126	\$450
(Number in second column is number of drums determined from total CSA capacity)				
- Transport drums to TSD for Treatment/Disposal				
Total Number of Drums (Number is total of CSA drums and Flam Shed drums)			126	
Total Number of Trucks Required to Transport Drums (84 per truck max)			2	
Cost per mile =\$5.64/mile				
Mileage = 500 miles (Number in second column is 500 miles x number of trucks)	Transport trailer(s) x 500 miles	\$5.64	1000	\$5,640
Disposal/treatment cost (per drum - low cost based on suitability for fuel)	TSD @ \$90/drum	\$90	63	\$5,670
Disposal/treatment cost (per drum - not suitable for fuel)	TSD @ \$179/drum	\$179	63	\$11,277
Activity 1. Subtotal				\$41,896

		Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
Activity	Category			
2. STORAGE TANK DECONTAMINATION				
<u>Assumptions:</u>				
- The tanks, piping and appurtenant equipment are decontaminated and remain in place				
- Rinsate sampling necessary because the tank will remain in place. Assumes 1 rinsate sample per tank.				
- Includes decontamination of the containment area				
- Assumes containment area to remain in place following decontamination				
- Assumes 1 rinsate sample required to leave containment in place				
- Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection.				
- Tank Interior Square Footage (based on tank volume)				
- Tank 1			Square Footage	
- Tank 2 (IF APPLICABLE)			905	
			0	
Total Tank Interior Square Footage			905	
- Tank Farm Containment Square Footage (includes floor and walls)			1995	
<u>Prime Contractor Costs</u>				
-Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Sample(s) (1 per tank and 1 per containment)			0.5000	
Work Rate for Sampling (hours per sample)			1	
Number of Samples			0.50	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88		\$46
- Drilling for Soil Samples (2.5 in boring to 1 ft each)			0.3050	
Work Rate for Drilling (hours per foot)			2	
Number of Feet (subslab sample depth = 1 foot each)			0.61	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29		\$89
- Collect 2 Soil Samples			0.5000	
Work Rate for Sampling (hours per sample)			2	
Number of Samples			1.00	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88		\$92
<u>Subcontractor Costs</u>				
- Decontaminate waste AST, piping and appurtenant equipment			0.0405	
Work Rate to Pressure Wash (hours per square foot)			905	
Area of Tanks to be decontaminated			37	
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	\$97.23		\$3,564
- Decontaminate Tank Containment Area			0.0405	
Work Rate to Pressure Wash 1 sq ft (hours per square foot)			1995	
Total Area of Containment (includes walls and floor)			81	
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	\$65.77		\$5,314
<u>Laboratory Subcontractor Costs</u>				
- Analyze rinsate sample(s) from tank(s) and containment area for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample SVOCs @ \$359/sample 8 RCRA Metals @ \$110/sample Total per sample cost	\$658	1	\$658
- Analyze soil sample(s) from containment area for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample SVOCs @ \$359/sample 8 RCRA Metals @ \$110/sample Total per sample cost	\$658	4	\$2,632
Activity 2. Subtotal				\$12,395

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
3. DECONTAMINATE THE RETURN/FILL STATION				
<u>Assumptions:</u>				
- Decontamination shall consist of washing with detergent/water solution and rinsing with high-pressure spray				
- Return/Fill structure and dock area will remain in place following decontamination				
- Drum washers to remain in place or sent offsite for reuse following decontamination				
- Rinsate sampling required from each drum washer to remain in place or sent offsite for reuse, and from containment				
- Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection				
- Square footage used for decontamination includes containment, dock and drum washer units				
			Square Footage	
			1980	
<u>Prime Contractor Costs</u>				
- Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Samples (1 per drum washer plus containment)				
Work Rate for Sampling (hours per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.00	\$92
- Drilling for Soil Samples (2.5 in boring to 1 ft each)				
Work Rate for Drilling (hours per foot)			0.3050	
Number of Feet (subslab sample depth = 1 foot each)			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29	0.61	\$89
- Collect Soil Samples				
Work Rate for Sampling (per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.00	\$92
<u>Subcontractor Costs</u>				
- Decontaminate waste AST, piping and appurtenant equipment				
Work Rate to Pressure Wash (hours per square foot)			0.0405	
Area of Return/Fill to be decontaminated			1980	
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	\$97.23	80	\$7,797
<u>Laboratory Subcontractor Costs</u>				
- Analyze 1 rinsate sample per drum washer and containment for VOCs, SVOCs and RCRA metals				
	VOCs @ \$189/sample			
	SVOCs @ \$359/sample			
	8 RCRA Metals @ \$110/sample			
	Total per sample cost	\$658	2	\$1,316
- Analyze soil sample(s) from containment area for VOCs, SVOCs and RCRA metals				
	VOCs @ \$189/sample			
	SVOCs @ \$359/sample			
	8 RCRA Metals @ \$110/sample			
	Total per sample cost	\$658	2	\$1,316
Activity 3. Subtotal				\$10,702

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
4. DECONTAMINATE CONTAINER STORAGE AREA(S)				
<u>Assumptions:</u>				
- Decontamination shall consist of washing with a detergent water solution and rinsing with a high-pressure spray				
- CSA(s) to remain in-place following closure				
- Decontamination of CSA includes floor, curbing and containment trenches				
- Assumes 1 rinsate and 2 soil samples required per CSA. Actual number of soil samples will be based on engineer's inspection.				
- CSA Containment Square Footage				
				Square Footage
- CSA 1				3718
- CSA 2 (IF APPLICABLE)				3718
Total CSA Square Footage				3718
<u>Prime Contractor Costs</u>				
-Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Samples (1 per CSA)				
Work Rate for Sampling (hours per sample)				0.5000
Number of Samples				1
Labor and equipment per work hour (PPE Level D)				
	Labor/equipment	\$91.88	0.50	\$46
- Drilling for Soil Samples (2.5 in boring to 1 ft each)				
Work Rate for Drilling (hours per foot)				0.3050
Number of Feet (subslab sample depth = 1 foot each x number of samples)				2
Labor and equipment per work hour (PPE Level D)				
	Labor/equipment	\$146.29	0.61	\$89
- Collect Soil Samples				
Work Rate for Sampling (hours per sample)				0.5000
Number of Samples				2
Labor and equipment per work hour (PPE Level D)				
	Labor/equipment	\$91.88	1.00	\$92
<u>Subcontractor Costs</u>				
- Decontaminate CSA(s)				
Work Rate to Pressure Wash (hours per square foot)				0.0405
Total Area of Permitted CSA(s) to be decontaminated				3718
Labor and equipment for CSA decon (PPE Level D)				
	Labor/equipment	\$65.77	151	\$9,904
<u>Laboratory Subcontractor Costs</u>				
- Analyze rinsate sample(s) from each CSA for VOCs, SVOCs and RCRA metals				
VOCs @ \$189/sample				
SVOCs @ \$359/sample				
8 RCRA Metals @ \$110/sample				
Total per sample cost				
		\$658	1	\$658
- Analyze 2 soil sample(s) from each CSA for VOCs, SVOCs and RCRA metals				
VOCs @ \$189/sample				
SVOCs @ \$359/sample				
8 RCRA Metals @ \$110/sample				
Total per sample cost				
		\$658	2	\$1,316
Activity 4. Subtotal				\$12,105

		Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
Activity	Category			
5. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				
<u>Assumptions:</u>				
- Amount of decon wash water generated derived from previous closure experience. Quantity based on approximately 0.8 gal/ sq ft for tank systems and 0.1 gal/sq ft for containment area floors				
Unit Description	Square Footage	Number Gallons	Number Drums	
STORAGE TANK DECONTAMINATION	905	724	14	
DECONTAMINATE TANK CONTAINMENT	2,908	291	6	
DECONTAMINATE THE RETURN/FILL STATION	1,980	1584	29	
DECONTAMINATE CONTAINER STORAGE AREA(S)	3,718	372	7	
PPE, CONSUMABLES, DEBRIS	NA	NA	5	
- Purchase 55-gallon drums to containerize wash water	Drums @ \$83 each	\$83	61	\$5,569
<u>Subcontractor Costs</u>				
- Transfer drums to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	61	\$218
- Transport drums to TSD for Treatment/Disposal				
Total Number of Trucks Required to Transport Drums (84 per truck max)			1	
Cost per mile =\$5.64/mile				
Mileage = 500 miles (Number in second column is 500 miles x number trucks)	Transport trailer(s) x 500 miles	\$5.64	1000	\$5,640
Disposal/treatment cost (per drum - low cost based on lack of hazardous constituents)	TSD @ \$90/drum	\$90	56	\$5,040
Disposal/treatment cost for PPE drums (assumed haz to landfill)	TSD @\$250/drum	\$250	5	\$1,250
Activity 5. Subtotal				\$17,717

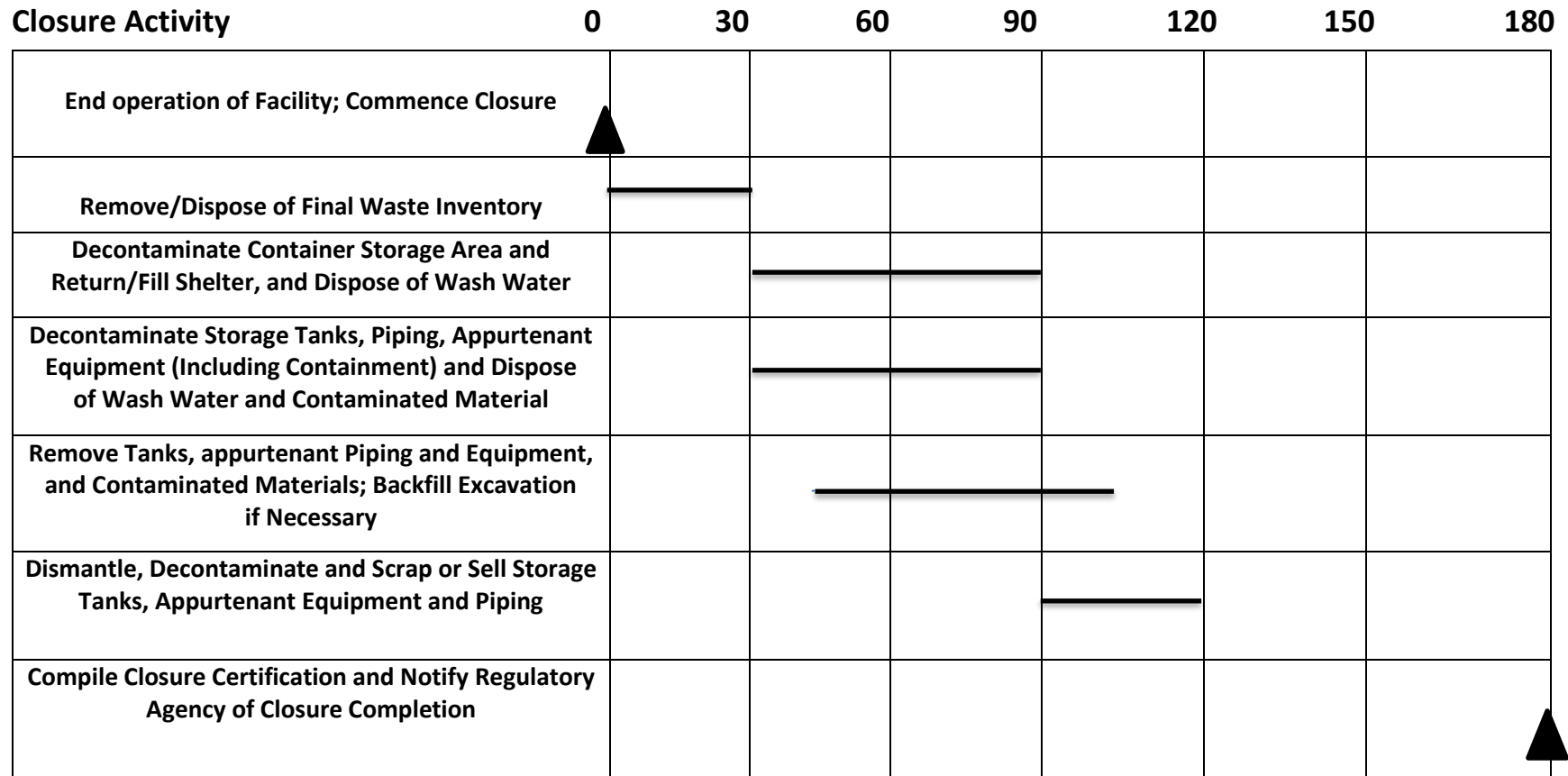
		Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
Activity	Category			
6. CLOSURE CERTIFICATION				
<u>Assumptions:</u>				
- Cost Pro unit rate per unit to be closed is \$4,118				
- Unit rate includes engineer inspection and decontamination oversight of each unit				
<u>Prime Contractor Costs</u>				
- Oversee and certify closure per unit times number of units	Project Manager/Engineer	\$4,118	3	\$12,354
Activity 6. Subtotal				\$12,354

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
COST ESTIMATE ACTIVITIES SUMMARY				
1. INVENTORY REMOVAL				\$41,896
2. STORAGE TANK DECONTAMINATION				\$12,395
3. DECONTAMINATE THE RETURN/FILL STATION				\$10,702
4. DECONTAMINATE CONTAINER STORAGE AREA(S)				\$12,105
5. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				\$17,717
6. CLOSURE CERTIFICATION				\$12,354
TOTAL CLOSURE COST ESTIMATE				\$107,169
CONTINGENCY				15%
TOTAL CLOSURE COST WITH CONTINGENCY				\$123,244
TOTAL CLOSURE COST WITH AND INFLATION FACTOR SINCE COST PRO V.6 (2009)				\$170,222

Notes:

- Estimate assumes that waste management units are at permitted capacity at time of closure, which is the most expensive in the facility's operating life.
- All unit rates obtained from Cost Pro version 6.0, which is designed to be representative of 3rd party costs and includes the following:
 - Transportation @ \$5.64/mile and 300 mile trip
 - Disposal for bulk liquids \$0.45/gallon based on suitability of waste mineral spirits as fuel
 - Disposal for CSA liquids \$90/drum based on suitability of drummed waste streams as fuel
 - Disposal of decon wash water \$90/drum based on lack of hazardous constituents in waste (soapy water)
 - Subcontractor Decontamination Rate for tanks and return/fill based on PPE Level C
 - Subcontractor decontamination rates for tank containment, CSAs and Flam Shed (if applicable) based on PPE Level D
 - Prime Contractor Rates based on hourly rate for rinsate sampling, drilling and soil sample collection
 - Lab subcontractor rates for analysis of rinsate and soil samples (Assumes VOCs, SVOCs and metals)
 - Closure Certification Activity includes contractor oversight, PE integrity inspections and reporting/Certification

Figure 10.3-1
Typical Closure Schedule
Safety-Kleen Tallahassee



Tab 9
Part II.P

P. Information Regarding Potential Releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

Facility Name Safety-Kleen Systems, Inc.

EPA/DEP I.D. No. FLD 982 133 159

Facility location Tallahassee Florida
City State

1. Are any of the following (SWMUs or AOCs), existing or closed at your facility?

A SWMU is a discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include all areas at a facility where solid wastes have been routinely and systematically released, as described in the July 27, 1990 Federal Register (55 FR 30798). The SWMU list in this form does not include all types of SWMUs. These are examples of the more common types of units. If you have a different type of SWMU, mark "yes" under "other".

AOCs are indiscernible units at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Examples of AOCs include areas where loading and unloading of chemicals may have occurred or an area of contamination with no known source.

Do not include hazardous waste units that are currently being permitted in your Part B Application.

Landfill	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Surface impoundment	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Land farm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Waste pile	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Incinerator	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Storage tank	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Container storage area	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Injection wells	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Wastewater treatment units	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Transfer station	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste recycling operations	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Land treatment facility	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Boiler/industrial furnace	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Satellite accumulation areas	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Less than 90-day storage units	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Stormwater retention ponds	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Septic tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Used oil/oil filter collection units	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Aerosol can/drum crushers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
On-ground areas, pits, ditches	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Other (units not listed above)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

2. For each “yes” answer in one (1.) above, on separate sheet(s) of paper:
 - a. Describe the wastes that were stored, treated or disposed of in each unit, and whether the wastes would be considered hazardous wastes or hazardous constituents under RCRA. (Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.) Include any available data on quantities or volumes of wastes disposed of and the dates of disposal.
 - b. Describe each unit, type of unit including construction details, capacity, dimensions (supply any available drawings), and location at the facility on the topographic map provided under 40 CFR 270.14(b)(19). Provide a site plan, if available, and the dates of operation of the unit [40 CFR 270.14(d)(1)]. If the information has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement.
 - c. Include a copy of federal, state and local permits or authorizations for SWMUs that may be permitted under other environmental programs.
3. For each unit described in two (2.) above, and for each hazardous waste unit in your Part B application [40 CFR 270.14(d)(2)], on separate sheet(s) of paper, provide available data on all prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring. If the data has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement. Provide the following information for each SWMU/AOC:
 - a. Date of release
 - b. Estimated or known quantity or volume of waste released
 - c. Location of the release
 - d. Describe the nature of the release (i.e., spill, overflow, ruptured pipe or tank, etc.).
4. Provide, for each unit, all available analytical data that describes the nature and extent of the environmental contamination due to the releases described in three (3.) above, on separate sheet(s) of paper. Focus on the concentrations of hazardous wastes or constituents present in contaminated media (e.g., soil, sediment, surface water and groundwater) [40 CFR 270.14(d)(3)]. If the information has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement.

Part II

P. #2 INFORMATION REQUIREMENTS REGARDING SOLID WASTE

MANAGEMENT UNITS

SWMU-1(Container Storage Area Inside Service Center) is described within the permit application in section Part II B.

SWMU-2 (Permitted Tank Storage Unit) is described within the permit application in section Part II C.

SWMU-3 (Used Antifreeze Storage Tank) is described in Part II C.

SWMU-4 (15,000-Gallon RCRA-Permitted Hazardous Waste Tank (Used Solvent)) is described in Part II C.

SWMU-5 (Non-Hazardous Vacuum Waste Tanker) is a 6,000-gallon tanker sitting in the containment area at the southeast corner of the parking lot. This tanker is used for storage of material serviced by Safety-Kleen's Vacuum program.

SWMU-6 (Transfer Waste Storage Area) is located in the warehouse building and is outlined on Figure 8.1-1.

SWMU-7 (Mercury Lamps/Devices & Battery Storage Area) is located in the warehouse building and is outlined on Figure 8.1-1.

SWMU-8 (Used Oil Filter Storage Area) is located in the warehouse and outlined on Figure 8.1-1.

SWMU-9 (Return/Fill Area) is described within the permit application Part II C and is outlined in Figure 9.3-1.

SWMU-10 (Satellite Container Area – Inside SWMU - 9) is depicted on Figure 9.3-1.

SWMU-11 (Used Oil Tanks – Inside SWMU - 2) are two 15,000 above ground horizontal storage tanks.

. SWMU-12 (Solid Waste Dumpster) is located in the northwest corner of the parking lot and is used for solid wastes (garbage) generated by the facility.

SWMU-13 (Loading/Unloading Areas) are depicted on Figure Part II Q and located as follows:

- 13A – at the warehouse dock
- 13B – Return/Fill dock
- 13C – Permitted Tank Storage Unit Area

Part II P.3 Prior/Current Releases

Date	Material	Amt. (Gallons)	Explanation
10/18/17	Non-Hazardous Petroleum Distillates	0.25	Leak from IBC (Intermediate Bulk Container) in the transfer area. This material was cleaned up with absorbent material and placed in the branch generated waste satellite container for disposal.
8/20/2021	Used Oil	30	A truck driver was loading Used Oil from a tank to a tanker and 30 gallons overflowed. The spill was contained and cleaned up with absorbent and Pig Mat rolls.

Tab 10

Part II.Q Information Requirements for SWMUs

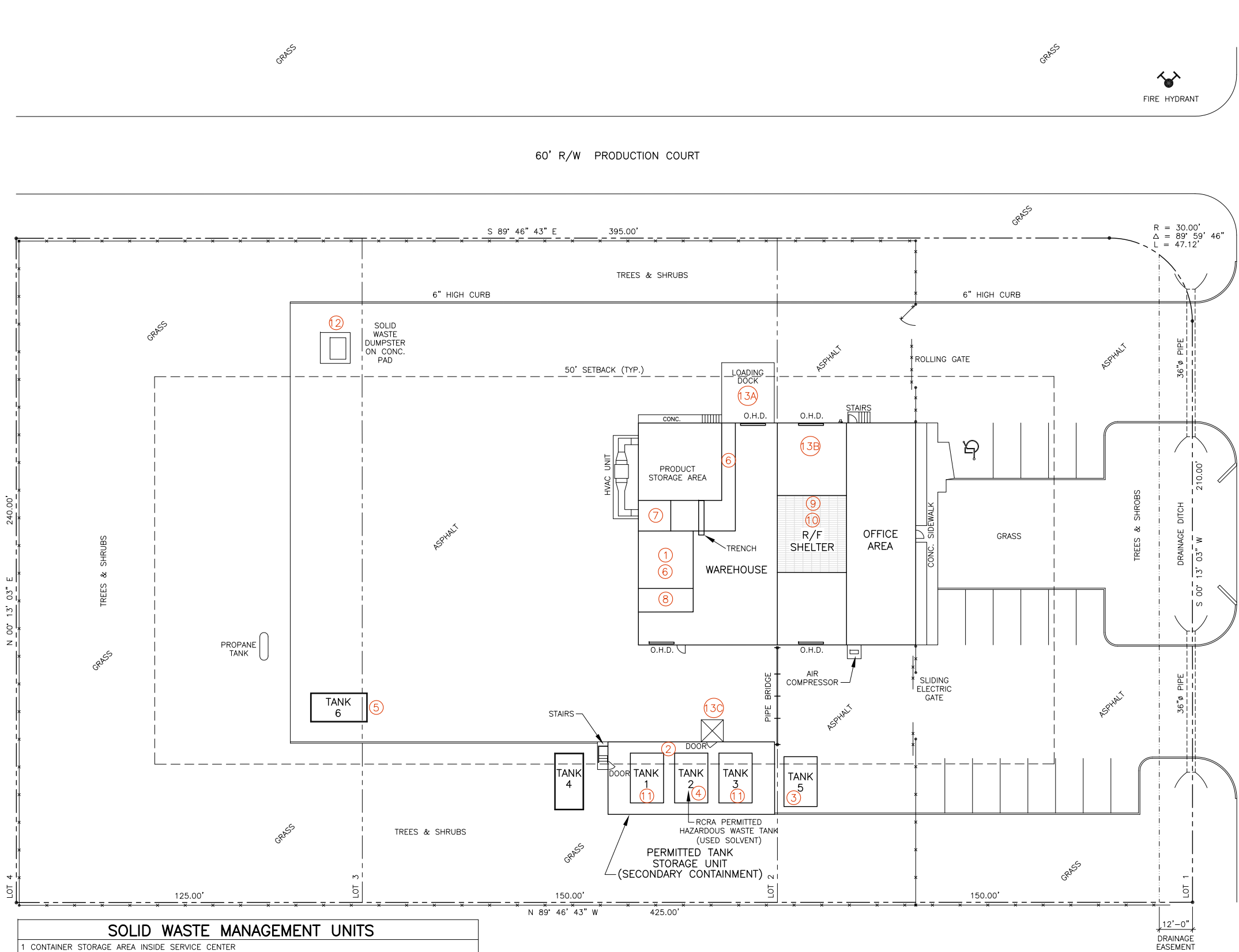
Part II

Q. INFORMATION REQUIREMENTS FOR SOLID WASTE MANAGEMENT UNITS

Part II.Q. of the Florida Department of Environmental Protection's (FDEP's) Application for a Hazardous Waste Permit outlines the information requirements for solid waste management units (SWMU's) at the facility. This section provides the required information.

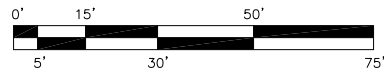
A RCRA Facility Assessment Report, dated March 1991, was completed by the Florida Department of Environmental Protection for the Safety-Kleen Tallahassee facility. In this report two SWMU's were identified – drum storage area, and tanks. The current permit, 009207-HO-011, lists thirteen (13) SWMU's for the Tallahassee branch. SWMU-13 is subdivided into 13A, 13B, and 13C. The complete list of SWMU's is found on the next page.

SWMU NUMBER	DESCRIPTION
1	Container Storage Area Inside Service Center
2	Permitted Tank Storage Unit (Secondary Containment)
3	Used Antifreeze Storage Tank
4	RCRA-Permitted Hazardous Waste Tank (Used Solvent) (Inside SWMU-2)
5	Non-Hazardous Vacuum Waste Tanker
6	Transfer Waste Storage Area
7	Mercury lamp/devices & Battery Storage Area
8	Used Oil Filter Storage Area (Inside SWMU-1)
9	Return/Fill Area
10	Satellite Container Area (Inside SWMU-9)
11	Used Oil Tanks (Inside SWMU-2)
12	Solid Waste Dumpster
13	Loading/Unloading Areas
13A	Warehouse Dock
13B	Return/Fill Dock
13C	Permitted Tank Storage Unit Area



SOLID WASTE MANAGEMENT UNITS

- 1 CONTAINER STORAGE AREA INSIDE SERVICE CENTER
- 2 PERMITTED TANK STORAGE UNIT
- 3 USED ANTI FREEZE STORAGE TANK
- 4 RCRA PERMITTED HAZARDOUS WASTE STORAGE TANK (USED SOLVENT)
- 5 NON-HAZARDOUS VACUUM WASTE TANKER
- 6 TRANSFER WASTE STORAGE AREA
- 7 MERCURY LAMPS/DEVICES & BATTERY STORAGE AREA
- 8 USED OIL FILTER STORAGE AREA
- 9 RETURN/FILL AREA
- 10 SATELLITE CONTAINER AREA (INSIDE SWMU-9)
- 11 USED OIL TANKS
- 12 SOLID WASTE DUMPSTER
- 13 LOADING/UNLOADING AREAS
 - 13A WAREHOUSE DOCK
 - 13B RETURN/FILL AREA
 - 13C PERMITTED STORAGE TANK UNIT AREA



GENERAL NOTES

1. ALL TANKS ARE ABOVE GROUND STORAGE TANKS (AST'S).

LEGEND

- FENCING
- - - PROPERTY LINE
- O.H.D. OVERHEAD DOOR
- GRATING

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	15,000 USG	USED OIL	HORIZONTAL TANK
2	15,000 USG	USED SOLVENT	RCRA PERMITTED HAZARDOUS WASTE HORIZONTAL TANK
3	15,000 USG	USED OIL	HORIZONTAL TANK
4	12,000 USG	CLEAN 150 SOLVENT	HORIZONTAL TANK ON CONCRETE PIERS
5	8,000 USG	USED ANTI FREEZE	HORIZONTAL TANK
6	7,000 USG	NON HAZ. VAC WASTE	HORIZONTAL TANK

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	ISSUED FOR PERMIT	JEK	JZ	JZ	08/30/24

PROPRIETARY STATEMENT

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TITLE LOCATIONS OF SOLID WASTE MANAGEMENT UNITS
4426 ENTREPOT BLVD.
TALLAHASSEE, FL. 32310

SAFETY-KLEEN SYSTEMS, INC.
42 LONGWATER DRIVE, NORWELL, MA. 02061
PHONE: 781-792-5000

SCALE 1"=20'-0"	BY JEK	CHKD JC	APPROVED JC	EHS	DATE 1/16/23
SERVICE CENTER LOCATION TALLAHASSEE, FL.			SC-DWG NUMBER 7094-SP00-001		REV. NO. A

FIGURE PART II-Q

Tab 11

Part II.S Subpart BB and CC

Part II

S. AIR EMISSION STANDARDS

AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

The requirements of 40 CFR 264 Subpart BB – Air Emission Standards for Equipment Leaks apply to the RCRA-Permitted Hazardous Waste Tank (Used Solvent), miscellaneous unit, and ancillary equipment. The regulations in this subpart apply to owners and operators of facilities that treat, store, dispose, or recycle hazardous wastes (except as provided in 264.1) and apply to equipment that contains or contacts hazardous wastes with organic concentrations of at least 10% by weight that are managed in units that are subject to the permitting requirements of Part 270.

“Equipment” is defined in 40 CFR 264.1031 as each valve, pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, or flange or other connector, and any control devices or systems required by Subpart BB. Each piece of equipment at the Safety-Kleen Tallahassee facility is marked in such a manner that it can be distinguished readily from other pieces of equipment using a numbered tag (see figures 11.1-1 and 11.1-2).

The information contained here are specific procedures for the Safety-Kleen Tallahassee branch to implement the Leak Detection and Repair Program.

Implementation Schedule

Implementation of the Leak Detection and Repair Program is the responsibility of the Safety-Kleen Branch Manager and facility personnel he/she designates

Equipment Standards

Pumps in Light Liquid Service (40 CFR 264.1052)

The facility has no pumps that contain or contact hazardous waste in light service.

Compressors (40 CFR 264.1053)

The facility has no compressors that contain or contact hazardous waste.

Pressure Relief Devices in Gas/Vapor Service (40 CFR 264.1054)

The facility does not maintain any pressure relief devices that contain or contact hazardous waste in gas/vapor service or closed vent systems or control devices.

Sampling Connecting Systems (40 CFR 264.1055)

The facility does not have any sampling connecting or in situ sampling systems. Recurring sampling of waste in contact with this equipment is not necessary since Safety-Kleen has determined that all liquid hazardous wastes in the equipment regulated by Subpart BB is presumed to be greater than 10% organic concentration and all equipment at the facility is to be managed in heavy liquid service as defined in 264.1031. Documentation of the actual vapor pressure for the hazardous wastes in contact with this equipment is maintained in the operating record at the facility. The vapor pressure of the used parts washer solvent at 20°C is approximately 0.11 kPa (2 mm-Hg).

Open-Ended Valves or Lines (40 CFR 264.1056)

Each open-ended valve or line will be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve will seal the open end at all times except during operations requiring hazardous waste stream flow through the open-ended valve or line. Each open-ended valve or line equipped with a second valve will be operated in a manner such that the valve on the hazardous waste stream end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but will comply with paragraph (a) of 40 CFR 264.1056 at all other times.

Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and Other Connectors (40 CFR 264.1058)

Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors will be monitored within 5 days by the method specified in 264.1063(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method.

At the present time, the pumps, valves, flanges, and other connectors at the Tallahassee facility are used for heavy liquid service. As defined in 40 CFR 264.1031, the used parts washer solvents managed at the facility are considered to be heavy liquid because the solvents have a vapor pressure less than 0.3 kilopascals at 20° C. Furthermore, no single contaminant is present in the wastes that has vapor pressure greater than 0.3 kilopascals in concentrations in excess of 20% by weight. In addition, the wastes presently managed in the equipment at the Tallahassee facility

have a maximum of 2,000 ppm concentration in the vapor phase. Therefore, a portable organic vapor analyzer will not be used for leak detection because leaks cannot result in concentrations of more than 10,000 ppm. Equipment leaks will be monitored based on visual inspection/observation. If a leak is detected, the piece of equipment is tagged and identified with the equipment number and date of actual leak detection. When a leak is detected, it will be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 264.1059. The first attempt at repair will be made no later than 5 calendar days after any leak is detected. First attempts at repair include, but are not limited to, the best practices under 264.1057(e), such as tightening or replacement of bonnet bolts, tightening of packing gland nuts, injection of lubricant into lubricated packing, etc. Repair tags identifying leaking or damaged equipment, except those tags on valves, will be removed after repair of the equipment.

Delay of Repair (40 CFR 264.1059)

The facility may delay repair of equipment for which leaks have been detected if the repair is technically infeasible without a hazardous waste unit shutdown. In such a case, repair of this equipment will occur before the end of the next hazardous waste management unit shutdown. Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the hazardous waste management unit and that does not continue to contain or contact hazardous waste with organic concentrations at least 10% by weight. Delay of repair for valves will be allowed if:

1. The facility determines that emissions of purged material resulting from immediate repair are greater than the emissions likely to result from delay of repair.
2. When repair procedures are affected, the purged material will be collected and destroyed or recovered in a control device complying with 254.1060.

The Facility may delay repair beyond a hazardous waste management unit shut down for a valve if valve assembly replacement is necessary during the hazardous waste management unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next hazardous waste management unit shutdown will not be allowed unless the next hazardous waste management unit shutdown occurs sooner than 6 months after the first hazardous waste management unit shutdown.

Testing

The facility will comply with the following test methods and procedures:

- A. The facility will determine, for each piece of equipment, whether the equipment contains or contacts a hazardous waste with organic concentration that equals or exceeds 10% by weight using the following:
 - 1. Methods described in ASTM Methods D 2267-88, E 169-87, E 168-88, E 260-85 (incorporated by reference under 260.11); or
 - 2. Method 9060A of SW-846 (incorporated by reference under 260.11); or
 - 3. Application of the knowledge of the nature of the hazardous waste stream or the process by which it was produced. Documentation of a waste determination by knowledge is required. Examples of documentation that will be used to support a determination under this provision include production process information that the waste is generated by a process that is identical to a process at the same or another facility that has previously been demonstrated by direct measurement to have total organic content less than 10%, or prior speciation analysis results on the same waste stream where it can also be documented that no process changes have occurred since that analysis that could affect the waste total organic concentration.
 - 4. All liquid hazardous waste in the equipment regulated by Subpart BB at this facility is presumed to be greater than 10% organic concentration and all equipment is to be managed in heavy liquid service as defined in 264.1031. Documentation of the actual vapor pressure is maintained in the operating record at the facility, and the vapor pressure of the used parts washer solvent at 20°C is approximately 0.11 kPa (2 mm-Hg).
- B. If the facility determines that a piece of equipment contains or contacts a hazardous waste with organic concentrations at least 10% by weight, the determination can be revised only after following the procedures in items A(1) or A(2) above.
- C. Samples used in determining the percent of organic content will be representative of the highest total organic content hazardous waste that is expected to be contained in or contact the equipment. Sampling methods for obtaining representative samples of hazardous waste for analysis under this section are the same as those found in the Waste Analysis Plan (Part II Waste Analysis Plan WAP).

Recordkeeping Requirements (40 CFR 264.1064)

The facility will maintain the recordkeeping requirements for all hazardous waste management Units subject to the provisions of Subpart BB in one recordkeeping system. The following Information will be recorded in the facility operating record and maintained on-site for a minimum of three (3) years:

1. For each piece of equipment to which Subpart BB applies:
 - a. Equipment identification number and hazardous waste management unit identity.
 - b. Approximate locations within the facility (identify the hazardous waste management units on a facility site plan).
 - c. Type of equipment (e.g., pump or pipeline valve).
 - d. Percentage of total organics in the hazardous waste stream which contacts equipment subject to this regulation is 100% by weight.
 - e. Hazardous waste state at the equipment (e.g., gas/vapor or liquid).
 - f. Method of compliance with the standard (e.g., daily inspections, leak detection and repair).
2. When each leak is detected as specified in 264.1052, 264.1053, 264.1057, and 264.1058, the following applicable requirements apply:
 - a. A weatherproof and readily visible identification, marked with the equipment identification number, date of evidence of a potential leak was found in accordance with 264.1058(a), and date the leak was detected, will be attached to the leaking equipment.
 - b. The identification on equipment, except on a valve, may be removed after it has been repaired.
 - c. The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 264.1057(c) and no leak has been detected during those 2 months.
3. When each leak is detected as specified in 264.1052, 264.1053, 264.1057, and 264.1058, the following information will be recorded in an inspection log and will be kept in the facility operating record:
 - a. The instrument and operator identification numbers and the equipment identification number.
 - b. The date of evidence of a potential leak was found in accordance with 264.1058(a).
 - c. The date the leak was detected and the dates of each attempt to repair the leak.

- d. Repair methods applied in each attempt to repair the leak.
 - e. “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
 - f. Documentation supporting the delay of repair of a valve in compliance with 264.1059(c).
 - g. The signature of the owner or operator (or designee) whose decision it was that the repair could not be affected without a hazardous waste management unit shutdown.
 - h. The expected date of successful repair of the leak, if a leak is not repaired within 15 calendar days.
 - i. The date of successful repair of the leak.
4. The following information pertaining to all applicable equipment subject to the requirements in 264.1052 through 264.1060 will be recorded in a log that is kept in the facility operating record:
- a. A list of identification numbers for equipment (except welded fittings) subject to the requirements of Subpart BB.
 - b. A list of identification numbers for equipment that the facility elects to designate for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, under the provisions of 264.1052(e), 264.1053(i), and 264.1057(f).
 - c. The designation of this equipment as subject to the requirements of 264.1052(e), 264.1053(i), or 264.1057(f) will be signed by the owner or operator.
 - d. A list of equipment identification numbers for pressure relief devices required to comply with 264.1054(a).
 - e. The dates of each compliance test required in 264.1052(e), 264.1053(i) 264.1054, and 264.1057(f), as applicable.
 - f. The background level measured during each compliance test.
 - g. The maximum instrument reading measured at the equipment during each compliance test.
 - h. A list of identification numbers for equipment in vacuum service.
5. The following information will be recorded in the facility operating record for use in determining exemptions as provided in the applicability section of this subpart and other specific subparts.

- a. An analysis determining the design capacity of the hazardous waste management unit.
 - b. A statement listing the hazardous waste influent to and the effluent from each hazardous waste management unit subject to the requirements in 264.1052 through 264.1060 and an analysis determining whether these hazardous wastes are heavy liquids.
 - c. An up-to-date analysis and the supporting information and data used to determine whether equipment is subject to the requirements in 264.1052 through 264.1060. The record will include supporting documentation as required by 264.1063(d)((3) when application of the knowledge of the nature of the hazardous waste stream or the process by which it was produced is used. If the facility takes any action (e.g., changing the process that produced the waste) that could result in an increase in the total organic content of the waste contained in or contacted by the equipment determined not to be subject to the requirements in 264.1052 through 264.1060, then a new determination is required.
6. Records of the equipment leak information and the operating information required by paragraph (d) and (e) of 264.1064 need only be kept for three (3) years. The Leak Detection and Repair Record used by the Safety-Kleen Tallahassee facility is found at the end of this section (Figure 11.1-3). Each piece of equipment which will be in hazardous waste service has been described by type and assigned a unique identification number. The location of the equipment within the hazardous waste management unit will be identified and placed in the Operating Record. Pursuant to Subpart BB of 40 CFR Part 264 and 40 CFR 270.25, Safety-Kleen inspects all regulated units for leaks each business day. Inspections are completed electronically (Form CO Tank Sys BB Equipment Inspection, found at the end of this section), and a list of equipment inspected is found on Figure 11.1-2, found at the end of this section. If an issue arises with the electronic inspection system, they will be completed on paper using Figure 11.1-2. All valves, pumps, and flanges are visually inspected. The inspection items have been properly tagged in accordance with 40 CFR 264.1050(d) and are inventoried on the environmental piping schematic diagrams included in Figure 11.1-1.

Due to the inherent properties of the waste parts washer solvent stored in the tank, the use of a screening device such as a photoionization detector (PID) is impractical. The liquids are heavy and have low vapor pressures, therefore a release would be visible in a liquid

phase rather than a vapor. The used parts washer solvent has a maximum of 2,000 ppm concentration in the vapor phase.

Reporting Requirements (40 CFR 264.1065)

Safety-Kleen will submit reports as required by 40 CFR Part 264.1065 to the Regional Administrator.

AIR EMISSION STANDARDS FOR TANKS, AND CONTAINERS

Safety-Kleen's Tallahassee facility manages wastes that range in Volatile Organic concentrations up to 100%. Therefore, all wastes managed in containers and in storage tanks are handled as being subject to 40 CFR 264 Subpart CC requirements based on the knowledge of the wastes managed at the facility. Therefore, no analytical waste determination is required.

EXEMPTIONS FROM 40 CFR 264.1084 – 264.1086 STANDARDS

Not applicable – The hazardous waste management units at this facility that are subject to Subpart CC requirements do not qualify for these stipulated exemptions.

Subpart CC Tank Standards (40 CFR 264.1084)

The Safety-Kleen Tallahassee facility manages hazardous wastes in a tank system that consists of one 15,000-gallon storage tank and ancillary equipment. The tank in this system is subject to Subpart CC requirements as a Level 1 Tank based on tank dimensions and maximum vapor pressure of volatile organic materials managed in this tank (see following table for criteria). A list of tank dimensions and maximum vapor pressure of volatile organics managed in tanks subject to Level 1 Tank controls is provided in the following table.

Applicability of Standards Level 1 Tanks

Tank Capacity	Maximum Vapor Pressure
> 151 cubic meters (39,800 gallons)	< 5.2 kPa (0.76 psia)
> 19800 gallons < 39,800 gallons	27.6 kPa (4.05 psia)
< 19,800 gallons	76.6 kPa (11.26 psia)

Tanks that meet the above size and vapor pressure limits and that are not heated to a temperature that would increase the vapor pressure of the materials above these limits are required to meet Level 1 Tank Standards. The storage tank at this facility is not heated to temperature greater than

the temperature at which maximum organic vapor pressure of the waste is determined for purposes of compliance with this standard. See Table 11.2-1, found at the end of this section, for a summary of the tank at the Tallahassee facility subject to the requirements of Subpart CC, and the applicable controls.

The RCRA-Permitted Hazardous Waste Tank (Used Solvent) is provided with a pressure relief device as indicated in Part II.C of the permit application. The device is a Morrison Brothers UL listed 8" Flanged Emergency Pressure Relief Vent, which is located on the top manway on the fixed tank roof. The emergency vent is designed to relieve excessive internal pressure in the event of fire or adverse chemical reaction. Should there be an event causing the pressure relief vent to be activated, the device will be visually inspected to ensure it is in good working condition.

Level 1 Tank Requirements (40 CFR 264.1084(c))

Safety-Kleen used parts washer solvent has a vapor pressure of less than 0.3 kilopascals at 20° C. The tank used for storing this waste has a capacity of 15,000 gallons. A complete description of the tank system is found in Part II C. Waste material stored in this tank is used Safety-Kleen Premium 150 Solvent. The waste managed in this tank is not being treated using a stabilization process, as defined in 40 CFR 264.1081. The storage tank meeting Level 1 requirements are equipped with fixed roofs with the following specifications:

- The fixed roof and its closure devices form a continuous barrier over the entire surface area of the hazardous waste in the tank.
- There are no visible cracks, holes, gaps, or other open spaces between roof section and the tank wall.
- Each opening in the fixed roof is equipped with a closure device designed to operate such that when the closure device is secured in closed position, there are no visible cracks, holes, gap, or other open spaces in the closure device or between the perimeter of the opening and the closure device or connected to a control device (control is not required for Level 1 Tanks).

Inspection Requirements for Level 1 Tanks are as follows:

The fixed roof and its closure devices are visually inspected to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes or gaps in the roof sections; broken, cracked, or damaged seals or gaskets on closure

devices; broken or missing hatches, access covers, caps, or other closure devices. A description of inspections and example logs for tank system can be found in Part II C.

Safety-Kleen will repair any defect detected during an inspection according to 40 CFR 264.1084(k). A first effort of repair of a defect detected in an inspection will be made no later than 5 calendar days after detection and a repair shall be completed as soon as possible but no later than 45 calendar days after detection except as provided in 40 CFR 264.1084(k)(2).

Level 2 Tanks (40 CFR 264.1084(d))

There are no level 2 tanks at this facility.

MISCELLANEOUS UNITS

Description and Applicability of Miscellaneous Units (Subpart X)

The drum washer/wet dumpster unit at the facility are managed under the Subpart X – Miscellaneous Units Standards of 40 CFR 264.600. This unit is located, designed, constructed, operated and maintained in a manner to protect human health and the environment. The unit is located within an area provided with secondary containment, as described in Part II.C, to prevent any potential releases from migrating to the surrounding subsurface or groundwater.

The drum washer/wet dumpster unit is designed to allow employees to empty drums of used parts washer solvent into the unit, rinse/clean the drums via a spray system with used solvent pumped within the unit by a recirculation pump. These drums are then refilled with clean recycled or virgin parts washer solvent. As designed and utilized, this unit is simply a device used to effectively convey the contents of the used parts washer solvent drums to the on-site RCRA-Permitted Hazardous Waste Tank (Used Solvent). The drum washer/wet dumpster unit is not designed or intended to treat, store, or accumulate hazardous waste.

When not actively being used to receive used parts washer solvent, or clean drums, the unit will be maintained in a closed position. The internal sump at the bottom of the wet dumpster will be emptied at the end of each day's operating shift.

The unit will be inspected for leaks or malfunctions each operating day in accordance with the inspection procedures outlined in Part II.C. The physical and chemical characteristics of the used parts washer solvent transferred through this unit can be found in Part II.A.5.

Subpart CC Container Standards (40 CFR 264.1086)

This section is applicable to containers that are greater than 26 gallons that are used to manage hazardous wastes with greater than 500 ppm volatile organic contents.

Hazardous waste containers that are filled (generated) at the facility as well as hazardous waste containers that are received from off site are subject to this rule. Part II.B of the permit application provides a summary of types of containers managed for which subpart CC is applicable. In addition, Table 11.2-2 (found at the end of this section) provides a summary of the areas, and types of containers managed, at the Tallahassee facility for which Subpart CC is applicable.

Level 1 Containers (40 CFR 264.1086(c))

Containers greater than 26 gallons but less than 119 gallons and containers greater than 119 gallons used in heavy material service (<0.038 psia) are to be controlled in accordance with one of the following Level 1 container standards as follows:

- Containers that meet DOT standards are in compliance with Subpart CC Level 1 container design standards. Safety-Kleen drums meet DOT standards; or
- A container equipped with cover and closure devices that form a continuous barrier over the container openings such that when the cover and closure devices are secured in the closed position there are no visible holes, gaps, or other open spaces into the interior of the container. The cover may be a separate cover installed on the container such as a lid on a drum or a tarp on a roll-off box; or
- An open-top container in which an organic-vapor-suppressing barrier is placed on or over the hazardous waste in the container such that no hazardous waste is exposed to the atmosphere.

Level 1 Container Operating Requirements (40 CFR 264.1086(c)(3))

Whenever a hazardous waste is in a container using Level 1 controls, the covers shall be Maintained in a closed position except as follows:

- Adding hazardous waste or other materials to the container: if the container is filled in one continuous operation, the container is closed upon conclusion of the filling operation. In the case of discrete or batch filling the container is to be closed:
 - a) upon filling the container to the intended final level;

- b) the completion of a batch loading after which no additional waste will be added within 15 minutes;
 - c) the person performing the loading operation leaving the immediate vicinity of the container; or
 - d) the shutdown of the process generating waste being added to the container.
- Removing hazardous waste from the container: When discrete quantities of hazardous waste are removed from the container, covers shall be promptly secured upon completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container, whichever occurs first. RCRA empty containers may be open to the atmosphere at any time.

Containers may be opened when sampling and/or measuring hazardous wastes, as well as adding or removing hazardous wastes from them. Covers must be replaced and secured on containers once such activities are completed.

Level 1 Container Inspection Requirements

All Level 1 Containers that are not emptied upon receipt at the facility, are inspected upon arrival and each day thereafter until the container is transferred to a recycle center. Each Level 1 Container and its cover and closure devices are inspected for visible cracks, holes, gaps, or other open spaces. No container remains at the facility over 1 year. If a defect is detected for a container, cover, or closure devices, a repair shall be attempted within 24 hours after detection, and repair shall be completed as soon as possible, but no later than 5 calendar days. The container will be over-packed in a DOT approved container as a means of repair. A description of the types of inspections and example logs for containers can be found in Part II B.

Level 2 Containers (264.1086(d))

Hazardous waste containers with design capacity greater than 119 gallons, and that are in light material service, are subject to Level 2 container standards. These include totes, roll-off boxes that are greater than 119 gallons in capacity, and bulk tankers and rail car tankers. Level 2 containers are not stored at this facility, therefore 40 CFR 264.1086(d) does not apply at this location. However, these types of containers may undergo 10-day transfer at the facility, but since they will be considered “still in the course of

transportation” Subpart CC will not be applicable.

Miscellaneous Units

If a leak is detected from the drum washer/wet dumpster unit during the daily visual inspection, the defect will be repaired no later than 45 days from the date of the detection, unless the standards associated with delay of repair (40 CFR 264.1084(k)(2) apply. First attempts to repair the equipment will occur within 5 days after the leak confirmation. Additional information concerning procedures for the inspection and detection of leaks from the equipment associated with the drum washer/wet dumpster unit can be found in Part II.C of this application.

Safety-Kleen has performed emissions monitoring of these units at numerous of its’ facilities across the U.S. and this data has consistently shown that VOC emission levels are considerably below the 10,000 ppm leak detection threshold.

Based on the above information there would not be any tangible environmental benefit to adding pollution controls to the drum washer/wet dumpster unit. In addition, developing pollution controls would be very difficult since processing containers of used parts washer solvent requires that the lids to the unit remain open during active operation and are located over an open grated working surface provided with a concrete secondary containment system. It should be noted that the drum washer/wet dumpster unit is drained and closed during those times of the operating day when no trucks are delivering used parts washer solvent to be processed. Also, at the end of each operating day, which typically consists of 2.5 – 4 hours of processing, the drum washer/wet dumpster unit is emptied, cleaned, closed and prepared for the next day’s operation. These procedures provide an additional amount of risk reduction.

Recording and Reporting

For demonstration of compliance with Subpart CC, as stipulated in 40 CFR 264.1089, Safety-Kleen Tallahassee branch maintains the required information described in this permit application.

- Documentation of Waste Determination is provided in Part II Waste Analysis Plan of this permit application.
- Documentation of Container design and closure is provided in Part II.B of this permit application.
- Documentation of Container and Tank inspections are provided in Part II.B and Part II.C of this permit application.

Records for required inspections are maintained at the facility (electronically) for a minimum of three (3) years.

Any written reports, as required by 40 CFR 264.1090, particularly 40 CFR 264.1090(b), will be prepared and submitted to the Regional Administrator as applicable within 15-calendar days of the time Safety-Kleen becomes aware of any occurrence of non-compliance under this standard.

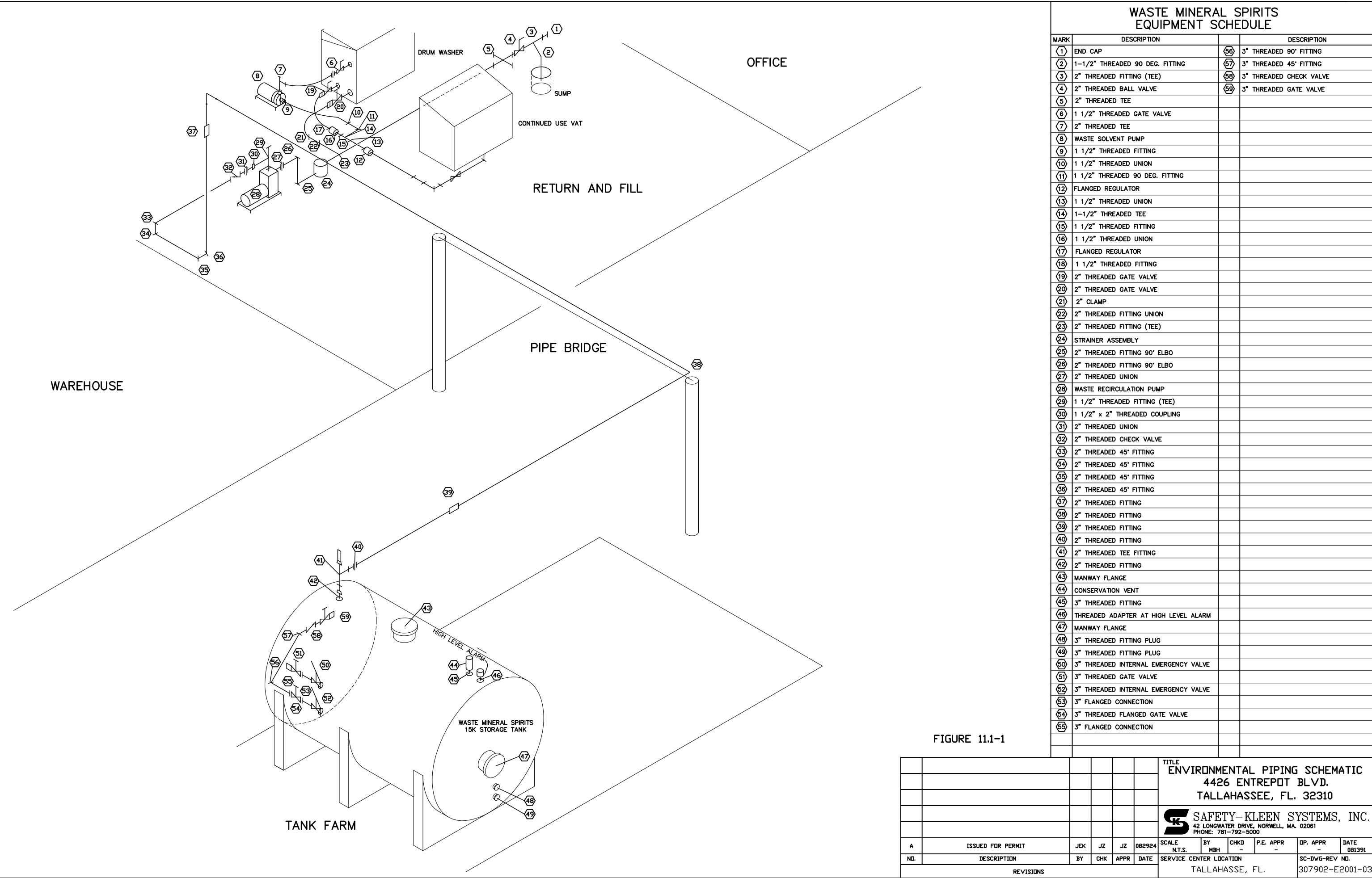


Figure 11.1-2
Safety-Kleen Tallahassee, FL
RCRA-Permitted Hazardous Waste Tank System (Used Solvent)/Subpart BB Equipment Tags

Pump, Flange, or Valve Number

1. End Cap
2. 1½" Threaded 90° Fitting
3. 2" Threaded Fitting (tee)
4. 2" Threaded Ball Valve
5. 2" 4-Way threaded fitting (tee)
6. 2" Threaded Gate Valve
7. 2" 3-Way threaded fitting (tee)
8. Waste MS Pump
9. 1½" threaded fitting
10. 1½" threaded fitting (union)
11. 1½" threaded 90° fitting
12. Flanged regulator
13. 1½" threaded fitting (union)
14. 1½" threaded 3-way fitting
15. 1½" Threaded fitting
16. 1½" threaded fitting (union)
17. Flanged regulator
18. 1½" threaded fitting
19. 2" Threaded gate valve
20. 2" Threaded gate valve
21. 2" clamp
22. 2" threaded fitting (union)
23. 2" threaded fitting (tee)
24. Strainer assembly
25. 2" threaded fitting 90° elbow
26. 2" threaded fitting 90° elbow
27. 2" threaded union
28. Waste recirculation pump
29. 1½" threaded fitting (tee)
30. 1½" threaded coupling
31. 2" threaded union
32. 2" threaded check valve
33. 2" threaded 45° fitting
34. 2" threaded 45° fitting
35. 2" threaded 45° fitting
36. 2" threaded 45° fitting
37. 2" threaded fitting
38. 2" threaded fitting
39. 2" threaded fitting
40. 2" threaded fitting
41. 2" threaded fitting
42. 2" threaded fitting
43. Manway flange
44. Conservation vent
45. 3" threaded fitting
46. Threaded adapter at HLA

- 47. Manway flange
- 48. 3" threaded fitting plug
- 49. 3" threaded fitting plug
- 50. 3" Threaded internal valve
- 51. 3" threaded gate valve
- 52. 3" threaded internal valve
- 53. 3" flanged connection
- 54. 3" threaded flanged gate valve
- 55. 3" flanged connection
- 56. 3" threaded 90° fitting
- 57. 3" threaded 45° fitting
- 58. 3" threaded check valve
- 59. 3" threaded gate valve

Figure 11.1-3
Leak Detection and Repair Record

Equipment ID# _____ Branch # _____

Description _____ Other _____

Date: _____ Inspector's Signature: _____

How was potential or actual leak detected:

Describe the potential or actual leak:

1. Instrument Monitoring within 5 days

Results: _____

2. Repair Attempt

Method: _____

Results _____

3. Repair Attempt

Method: _____

Results: _____

4. Date of Successful Repair

(Must be completed within 15 days)

Method: _____

Results: _____

5. Results: _____

6. Results: _____

Monitoring Summary

(Reference Number – See above)

	(1)	(2)	(3)	(4)	(5)	(6)
Instrument#/Operator	_____	_____	_____	_____	_____	_____
Calibration	_____	_____	_____	_____	_____	_____
Background Reading	_____	_____	_____	_____	_____	_____
Reading at Equipment	_____	_____	_____	_____	_____	_____
Leak Detected?	_____	_____	_____	_____	_____	_____



CO Tank Sys BB Equipment

Form Code: 42

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Tank System BB Equipment Instruction	
Note condition of inspection items. Inspect all tagged and non-tagged points per area plan or system drawing specification. All unsatisfactory findings must be explained. Include any repairs, changes or corrective actions.	
CO Tank System BB Equipment Inspection Items	
Inspect all tagged and non-tagged tank system identified BB equipment points per area plan - Check for evidence of failure. (e.g., all inclusive review of all equipment pumps, valves, flanges, connections, unions, couplings or caps for potential leaks, active leaks, sticking, wear, does not operate smoothly, other).	
Each open-ended valve or line is equipped with a cap, blind flange, plug, or a second valve, which seals the open end at all times except when hazardous waste flows through the open ended valve or line. [264.1056/ 265.1056]	
Pieces of equipment found to be leaking, usually by visual means, are repaired within 15 calendar days and the first attempt to repair is made within 5 calendar days. [264.1058(c)/ 265.1058(c)]	
When a leak is detected, a weatherproof identification tag is attached to the leaking equipment with ID # and the date leak was detected. The identification may be removed after repair. [264.1064(c)/ 265.1064(c)]	
The liquids in use are heavy liquids. It should be assumed that all hazardous liquids managed in storage tanks contain between 80% and 100% organics.	
Subpart BB equipment tags that are "Difficult to Monitor" will be inspected on an annual basis (i.e. those that are located on top of tanks)	
Compliance Footer	
Inspector Signature	

Attach Photo	
Inspection Overall Assessment	

TABLE 11.2-1
SUMMARY OF TANK MANAGEMENT UNITS SUBJECTED TO SUBPART CC
SAFETY-KLEEN SYSTEMS, INC. TALLAHASSEE, FL
EPA ID NUMBER: FLD 982 133 159

Hazardous Waste Management Unit	Location of Hazardous Waste Management Unit	EPA Hazardous Waste Codes Managed	Brief Waste Description	Average Volatile Organic Concentration of Hazardous Waste	Subpart CC Status	Control Option (See Table 11.2-3)
RCRA-Permitted Hazardous Waste Tank (Used Solvent) (15,000 gal.)	See Figure 2.2-5	D001, and codes listed in Note 1 below	Waste Parts Washer Solvent (Petroleum-Naphtha)	> 500	Subject to Tank Level 1 controls per 264.1084(c)	1

NOTE 1: D018, D039, D040

TABLE 11.2-2
SUMMARY OF CONTAINER MANAGEMENT UNITS SUBJECTED TO SUBPART CC
SAFETY-KLEEN SYSTEMS, INC. TALLAHASSEE, FL
EPA ID NUMBER: FLD 982 133 159

Hazardous Waste Management Unit	Location of Hazardous Waste Unit	EPA Hazardous Waste Codes Managed	Brief Waste Description	Average Volatile Organic Concentration of Hazardous Waste	Container Type	Subpart CC Status	Control Option (See Table 11.2-3)
Container Storage Area	See Figure 2.2-5	D001, F002, F003, F005 and codes listed in Note 1 below F001, F004 are managed in the transfer storage area (10-day)	Waste Parts Washer Solvent (Petroleum Naphtha), Dry Cleaner Wastes, Paint Waste, Immersion Cleaner Waste	> 500	1A1, 1A2, 1H2	Container Level 1 Controls per 264.1086(c)	11
Return and Fill Shelter	See Figure 2.2-5	D001 and codes listed in Note below	Waste Parts Washer Solvent (Petroleum Naphtha)	> 500	1A2	Subject to Container Level 1 controls per 264.1086(c)	11

Note: D004 thru D011, D018, D019, D021 thru D030, and D032 thru D043

Table 11.2-3

Subpart CC Control Options*Tanks*

1. These tanks shall comply with Tank Level 1 controls which require tanks to have a fixed roof with no visible cracks, holes, gaps, or other spaces in accordance with 40 CFR 264.1084(c). The tank shall be visually inspected for defects prior to the tank becoming subject to these requirements and at least once a year thereafter [40 CFR 264.1084(c)].
2. These tanks are fixed roof tanks equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(e). The internal floating roof shall be visually inspected for defects at least once every twelve months after initial fill unless complying with the alternative inspection procedures in 40 CFR 264.1084(e)(3)(iii). [40 CFR 264.1084.(d)(1)]
3. These tanks are equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(f). The external roof seal gaps shall be measured in accordance with procedures contained in 40 CFR 264.1084(f)(3)(I) within 60 days and at least once every 5 years thereafter. The external floating roof shall be visually inspected for defects at least once every 12 months after initial fill. [40 CFR 264.1084(d)(2)]
4. These tanks are vented through a closed-vent system to control device and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(g). The tank shall be equipped with a fixed roof and closure devices which shall be visually inspected for defects initially and at least once every year. The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 264.1087. [40 CFR 264.1084(d)(3)]
5. These tanks are pressure tanks which shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(h). [40 CFR 264.1084(d)(4)]
6. These tanks are located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(l). The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 264.1087 [40 CFR 264.1084(d)(5)]
7. These tanks have covers which have been specified as “unsafe to inspect and monitor” and shall comply with the requirements of 40 CFR 264.1084(l)(1) [40 CFR 264.1084(f) & (g)]

Table 11.2-3

Subpart CC Control Options*Containers*

8. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and meet the applicable US DOT regulations under the Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1) & (c)(1)(i)]
9. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(i) & (c)(1)(i)]
10. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and are open-top containers in which an organic-vapor suppressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(i) & (c)(1)(iii)]
11. These containers have a design capacity greater than 0.46 m³, are not in light material service and meet the applicable US DOT regulations under Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(i)]
12. These containers have a design capacity greater than 0.46 m³, are not in light material service and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(ii)]
13. These containers have a design capacity greater than 0.46 m³, are not in light material service and are open-top containers in which an organic-vapor suppressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(iii)]
14. These containers have a design capacity greater than 0.46 m³, are in light material service and meet the applicable US DOT regulations under Container Level 2 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(iii) & (d)(1)(i)]

Table 11.2-3

Subpart CC Control Options

15. These containers have a design capacity greater than 0.46 m³, are in light material service and operate with no detectable organic emissions as defined in 40 CFR 265.1081. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1088(b)(1)(iii) & (d)(1)(ii)]
16. These containers have a design capacity greater than 0.46 m³, are in light material service and that have been demonstrated within the preceding 12 months to be vapor tight using 40 CFR Part 60, Appendix A, Method 27. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1088(b)(1)(ii) & (c)(1)(i)]
17. These containers have a design capacity greater than 0.1 m³ that are used for treatment of a hazardous waste by a waste stabilization process and are vented directly through a closed-vent system to a control device in accordance with 40 CFR 264.1086(e)(2)(ii). The closed-vent system and control devices shall be inspected and monitored as specified in 40 CFR 264.1087. [40 CFR 264.1088(b)(2) & (e)(1)(i)]
18. These containers have a design capacity greater than 0.1 m³ that are used for treatment of a hazardous waste by a waste stabilization process and are vented inside an enclosure which is exhausted through a closed-vent system to a control device in accordance with 40 CFR 264.1086(a)(2)(i) & (ii).). The closed-vent system and control devices shall be inspected and monitored as specified in 40 CFR 264.1087. [40 CFR 264.1088(b)(2) & (e)(1)(ii)]

Appendix A
Site Photographs



Safety-Kleen Tallahassee
Front Entrance of Building



Safety-Kleen Tallahassee

Loading Dock



Safety-Kleen Tallahassee

Permitted Tank Storage Unit (Tank Farm)



Safety-Kleen Tallahassee

Tanker Offloading



Safety-Kleen Tallahassee

Double-Walled Used Antifreeze Tank



Safety-Kleen Tallahassee

Double-Walled Clean Solvent Tank



Safety-Kleen Tallahassee

Solid Waste Dumpster



Safety-Kleen Tallahassee

Container Storage Area



Safety-Kleen Tallahassee

Transfer Waste Area in Container Storage Area



Safety-Kleen Tallahassee

Return/Fill Shelter



Safety-Kleen Tallahassee

Vacuum Waste Tanker with Containment

Appendix B
Chemical Analysis Reports
Annual Re-Characterization

2024 AR Codes and SKDOTS March 2024 - National

Waste Stream	Description Subcategory	Changes from 2022 to 2023	2023 National Waste Codes	2023 NATIONAL Profile	Changes from 2023 to 2024	2024 National Waste Codes	2024 NATIONAL Profile
Branch Contaminated Debris (Solid would not carry D001)	N/A	No Change	F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043	Refer to CH Outbound	No Change	F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043	Refer to CH Outbound
Immersion Cleaner	N/A	No Change	D039, D040	153634	No Change	D039, D040	153634
Parts Washer Solvent 105 Virgin	under 100 lbs	No Change	D001, D018, D039, D040	150045	No Change	D001, D018, D039, D040	150045
	over 100 lbs (RQ)			150085			150085
	Non-RQ DF container (no DOT SP)			157045			157045
Bulk MS Solvent	N/A	No Change	D001, D018, D039, D040	Refer to CH Outbound	No Change	D001, D018, D039, D040	Refer to CH Outbound
Parts Washer Solvent Sludge/Dumpster Mud	N/A	No Change	D001, D018, D039, D040	Refer to CH Outbound	No Change	D001, D018, D039, D040	Refer to CH Outbound
Parts Washer Solvent Tank Bottoms (bulk)	N/A	No Change	D001, D018, D039, D040	Refer to CH Outbound	No Change	D001, D018, D039, D040	Refer to CH Outbound
Premium (150) / PRF / PDF Mil Spec Solvent	N/A	No Change	D039	150055	No Change	D039	150055
	DF container (no DOT SP)			157055			157055
Paint Gun Cleaner	under 100 lbs	No Change	F003, F005, D001, D018, D035, D039, D040	150380	No Change	F003, F005, D001, D018, D035, D039, D040	150380
	over 100 lbs (RQ)			150425			150425
Paint Gun Cleaner (Premium Thinner)	under 100 lbs	No Change	F003, F005, D001, D018, D035, D039, D040	158380	No Change	F003, F005, D001, D018, D035, D039, D040	158380
	over 100 lbs (RQ)			158381			158381
Clear Choice Paint Gun Cleaner	under 100 lbs	No Change	F003, D001, D018, D035, D039, D040	150426	No Change	F003, D001, D018, D035, D039, D040	150426
	over 100 lbs (RQ)			150427			150427
Paint Waste Other	Any size container	No Change	F003, F005, D001, D018, D035, D039, D040	150375	No Change	F003, F005, D001, D018, D035, D039, D040	150375
Universal Paint Gun Cleaner	N/A	No Change	D001, D018, D035, D039, D040	403901294	No Change	D001, D018, D035, D039, D040	403901294
Dry Cleaner (Perc) Bottoms	N/A	No Change	F002, D007, D039, D040	150589	No Change	F002, D007, D039, D040	150589
Dry Cleaner (Perc) Filters	N/A	No Change	F002, D007, D039, D040	150621	No Change	F002, D007, D039, D040	150621
Dry Cleaner (Perc) Separator Water	N/A	No Change	F002, D039, D040	150520	No Change	F002, D039, D040	150520
Dry Cleaning Naphtha Bottoms	N/A	No Change	D001, D007, D039, D040	150422	No Change	D001, D007, D039, D040	150422
Dry Cleaning Naphtha Filters	N/A	No Change	D001, D007, D039, D040	150424	No Change	D001, D007, D039, D040	150424
Dry Cleaning Naphtha Separator Water	N/A	No Change	D001, D039, D040	150423	No Change	D001, D039, D040	150423