

**SAFETY-KLEEN SYSTEMS, INC.  
TULSA, OKLAHOMA  
RCRA OPERATIONS PERMIT**

**FACT SHEET**

Type of Action: Oklahoma Department of Environmental Quality (DEQ) Resource Conservation and Recovery Act (RCRA) Operations Permit (Permit) renewal for managing hazardous waste under the Hazardous and Solid Waste Amendments to RCRA of 1984 and the Oklahoma Hazardous Waste Management Act (OHWMA).

Type of Facility: Safety-Kleen Systems, Inc. (Safety-Kleen) owns and operates a hazardous waste management facility whose activities include storage and consolidation of hazardous wastes from off-site industrial and commercial generators. The facility stores up to 13,560 gallons of hazardous wastes in containers and 16,000 gallons in tanks. The types of wastes managed are primarily from businesses that provide automotive repairs, industrial maintenance, and dry-cleaning services. The facility has been in operation since January 1, 1978.

EPA ID Number: OKD000763821

Location: 16319 East Marshall Street  
Tulsa, OK 74116

Legal Description: The facility's legal description is as follows: Lot Five (5), Six (6), Seven (7) and Eight (8), Block (1) THE NORTH 161<sup>ST</sup> EAST INDUSTRIAL PARK, a subdivision in Section 35, Township 20 North, Range 14 East of the I.B.&M. Rogers County, Oklahoma, according to the recorded Plat thereof.

Geographic Location: Latitude: 36.172962  
Longitude: -95.795151

Landowner: Safety-Kleen Systems, Inc.

Facility Operator: Safety-Kleen Systems, Inc.

Comment Period: 45 days from the date of publication

**Basis of the Draft Permit:**

On May 14, 2024, DEQ received a RCRA Part B Permit Application (Application) for the renewal of the Safety-Kleen RCRA Operations Permit. DEQ determined the Application to be incomplete on August 15, 2024, after an administrative review. Safety-Kleen provided additional information on September 12, 2024, and DEQ determined the Application to be administratively complete.

After a technical review, DEQ requested additional information in correspondence dated September 19, 2024. Safety-Kleen responded with all required information on November 14, 2024.

The requirements of OHWMA; the Oklahoma Administrative Code hazardous waste management regulations (OAC 252:205), as amended; RCRA; and Title 40 of the Code of Federal Regulations (40 C.F.R.) have been met, and DEQ has prepared proposed Permit Conditions. The proposed Permit allows the Permittee to continue managing hazardous waste in accordance with the Permit.

The administrative record supporting the potential Permit Conditions consists of the initial Application, including all supplemental information submitted that relates to the Application or is referenced in the Draft Permit and this Fact Sheet.

The proposed Permit Conditions incorporate the applicable requirements of OAC 252:205 and 40 C.F.R. Parts 264 and 270 and other such conditions as are required to achieve environmentally sound hazardous waste management.

### **Information Resources**

Copies of the proposed draft Permit Conditions, this Fact Sheet, and the Application are available for review during normal business hours at the locations listed below:

The Catoosa Public Library  
105 East Oak Street  
Catoosa, OK 74015  
Phone: (918) 266-1684

Oklahoma Department of Environmental Quality  
Office of Central Records  
707 North Robinson Ave., 2<sup>nd</sup> Floor  
Oklahoma City, Oklahoma 73102  
Phone: (405) 702-1188

DEQ Website:  
<https://www.deq.ok.gov/land-protection-division/permit-public-participation-process/>

Telephone inquiries may be directed to:

DEQ: Hillary Young, Chief Engineer  
Land Protection Division, DEQ  
Phone: (405) 702-5100

Safety-Kleen: Ms. Emilly DeVore  
Sr. Environmental Compliance Manager  
Safety-Kleen Systems, Inc.  
Phone: (417) 324-8838

### **Comment Period and Procedures**

Persons wishing to comment on the proposed Permit Conditions may submit written comments to DEQ at the address listed below. DEQ will consider and formally respond to all relevant comments in the issuance of the final permit decision. Comments should be directed to the appropriateness of the permit decision and the Permit Conditions and should be factual in nature. All comments must be received at DEQ no later than forty-five (45) days after the publication of the Notice for the Draft Permit.

Hillary Young, P.E.  
Chief Engineer  
Land Protection Division  
Oklahoma Department of Environmental Quality  
707 N. Robinson, Ave,  
P. O. Box 1677  
Oklahoma City, OK 73101-1677

The applicable comment period and public meeting procedures may be found at OAC 252:4 and 40 C.F.R. Part 124. The comment period during which written comments on the Draft Permit may be submitted extends for forty-five (45) days from the date of notice of the proposed action.

### **Notice of Final Determination**

DEQ will notify the applicant and each person who has submitted written comments or requested notice when the final permit decision is made. Within thirty (30) days after a RCRA permit decision has been made, any person who filed comments on the draft permit or participated in the public meeting/hearing, if any, may petition the Executive Director of DEQ to review any condition of the permit decision. The petition shall include a statement of the reasons supporting that review, including a demonstration that any issues being raised were raised during the public comment period and, when appropriate, a showing that the condition in question is based on a finding of fact or conclusion of law which is clearly erroneous or an exercise of discretion or important policy consideration which DEQ should review. A petition to DEQ is a prerequisite to judicial review under OAC 252:205-3-2 which incorporates 40 C.F.R. § 124.19 and should be directed to the address listed below:

Robert Singletary, Executive Director  
Department of Environmental Quality  
707 N. Robinson Ave  
Oklahoma City, Oklahoma 73101-1677

If no comments are received during the comment period, the Permit will become final and effective immediately upon issuance.

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY  
RESOURCE CONSERVATION AND RECOVERY ACT PERMIT FOR  
A HAZARDOUS WASTE MANAGEMENT FACILITY**

<b>EPA ID:</b>	OKD000763821	<b>Permit Number:</b>	000763821
<b>Permittee:</b>	Safety-Kleen Systems, Inc. 16319 East Marshall Street Tulsa, OK 74116	<b>Effective Date:</b>	January __, 2025
		<b>Expiration Date:</b>	January __, 2035

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Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. §§ 6901 et seq., commonly known as RCRA), including the Hazardous and Solid Waste Amendments of 1984 (HSWA), and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) codified in Title 40 of the Code of Federal Regulations (C.F.R.), and the Oklahoma Hazardous Waste Management Act (OHWMA), 27A O.S. §§ 2-7-101 through 2-7-134, as amended, and regulations promulgated thereunder, a RCRA Permit to conduct hazardous waste management activities is reissued by the Oklahoma Department of Environmental Quality (DEQ) to Safety-Kleen Systems, Inc. (hereafter called the Permittee).

This legal description of the facility is: Lot Five (5), Six (6), Seven (7) and Eight (8), Block (1) THE NORTH 161ST EAST INDUSTRIAL PARK, a subdivision in Section 35, Township 20 North, Range 14 East of the I.B.&M. Rogers County, Oklahoma, according to the recorded Plat thereof.

The Permittee is a hazardous waste storage facility whose activities include storage and consolidation of hazardous wastes from off-site industrial and commercial generators. The facility stores up to 13,560 gallons of hazardous wastes in containers and 16,000 gallons in tanks. The types of wastes managed are primarily aqueous and organic cleaning solutions from businesses that provide automotive repairs, industrial maintenance, and dry-cleaning services.

The Permittee must comply with all terms and conditions of this Permit. This Permit consists of the conditions contained herein (including those in any attachments); the applicable regulations contained in 40 C.F.R. Parts 124, 260 through 264, 266, and 270, as specified in the Permit; and other applicable state and federal statutes and regulations. Applicable regulations are those which are in effect on the date of issuance of the Permit, in accordance with 40 C.F.R. § 270.32(c). Primary responsibility for the enforcement of the provisions of this Permit lies with DEQ.

This Permit is based upon the assumption that all the information submitted in the Part B Permit Application received on May 14, 2024, as modified by subsequent amendments, the last one dated November 14, 2024, (hereafter referred to as the Application) is accurate and that the facility will be operated as specified in the Application and this Permit.

Any inaccuracies found in the submitted Application may be grounds for the termination, revocation and reissuance, or modification of this Permit in accordance with 40 C.F.R. §§ 270.41, 270.42, and 270.43 and for enforcement action.

This Permit is effective as of January \_\_\_, 2025, and shall remain in effect until January \_\_\_, 2035, unless revoked and reissued under 40 C.F.R. § 270.41, terminated under 40 C.F.R. § 270.43, or continued in accordance with 40 C.F.R. § 270.51(a) and Title 252, Oklahoma Administrative Code, Chapter 205, otherwise known as the hazardous waste management rules, and the Oklahoma Administrative Procedures Act 75 O.S. §§ 250 *et seq.*

Issued this \_\_\_ day of January 2025.

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Hillary Young, P.E.  
Chief Engineer  
Land Protection Division

Date

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Kelly Dixon  
Director  
Land Protection Division

Date

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**PERMIT ATTACHMENTS**

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- Attachment 2 – Waste Analysis Plan
- Attachment 3 – Preparedness and Prevention Plan
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Appendix C – Maps and Facility Drawings

Appendix D – Analytical Data

Appendix E – Equipment Information

Appendix F – Emergency Information

Appendix G – Training Information

Appendix H – Financial Requirements

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## SECTION I GENERAL PERMIT CONDITIONS

### A. GENERAL

The Permittee shall monitor, maintain and operate the Safety-Kleen Systems, Inc. facility (Facility) in compliance with the provisions of the Oklahoma Hazardous Waste Management Act (OHWMA), 27A Oklahoma Statutes (O.S.) §§ 2-7-101 through 2-7-134, as amended; the Oklahoma Administrative Code (OAC) 252:205 and 252:515; the federal Hazardous Waste Management Regulations in Title 40 of the Code of Federal Regulations (C.F.R.) Parts 260-279; the Resource Conservation and Recovery Act (RCRA); the Hazardous and Solid Waste Amendments of 1984 (HSWA); and the approved Permit Application as further modified through Permit Conditions set herein.

### B. BASIS OF PERMIT

This Permit is granted based on the information submitted and the design criteria presented in the application. Any inaccuracies found in this information could provide cause for the termination or modification of this Permit and for enforcement action. The Permittee is to inform the Land Protection Division of the Oklahoma Department of Environmental Quality (DEQ) of any deviation from or changes in the design or operation of the facility that could affect the Permittee's ability to comply with the applicable regulations or Permit Conditions.

### C. INCORPORATION BY REFERENCE

All the referenced federal regulations (40 C.F.R. Parts 124, 260 through 266, 268, 270, 273 and 279) as specified in the Permit are, unless otherwise stated, incorporated in their entirety by OAC 252:205-3-2.

### D. DEFINITIONS

For purposes of this Permit and the special conditions pursuant to the 1984 Hazardous and Solid Waste Amendments to RCRA terms used herein shall have the same meaning as those in 40 C.F.R. Parts 124 and 260 through 270 and OAC 252:205 unless this Permit specifically provides otherwise. Where terms are not defined in the Oklahoma Administrative Code or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

**“Action Levels”** means health and environmental-based levels of constituent concentrations determined by DEQ to be indicators for protection of human health and the environment. Oklahoma drinking water maximum contaminant levels (MCLs), or an alternate limit established by DEQ per 40 C.F.R. § 264.94(b), will be considered Action Levels for groundwater and surface water. The calculation of action levels is specified in the EPA RFI guidance.

**“Area of Concern” (AOC)** means any discernable unit or area which, in the opinion of DEQ, may have received solid or hazardous waste or waste containing hazardous constituents at any time. DEQ may require investigation of the unit as if it were a solid waste management unit (SWMU). If shown to be a SWMU by the

investigation, the AOC must be reported by the Permittee as a newly identified SWMU. If the AOC is shown not to be a SWMU by the investigation, DEQ may determine that no further action is necessary and notify the Permittee in writing.

“**CMS**” means Corrective Measures Study.

“**DEQ**” means the Oklahoma Department of Environmental Quality.

“**Director**” means the Executive Director of DEQ, or his/her designee or authorized representative.

“**Division Director**” means the Director of the Land Protection Division of DEQ, or his/her designee or authorized representative.

“**DOT**” means the United States Department of Transportation.

“**EPA**” means the United States Environmental Protection Agency.

“**Facility**” means all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA.

“**HSWA**” means the 1984 Hazardous and Solid Waste Amendments to RCRA.

“**Hazardous Constituent**” means any constituent identified in Appendix VIII of 40 C.F.R. Part 261 or any constituent identified in Appendix IX of 40 C.F.R. Part 264.

“**Hazardous Waste**” means a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. The term hazardous waste includes hazardous constituent.

“**Land disposal**” means placement in or on the land, except in a corrective action management unit or staging pile, and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, or placement in a concrete vault, or bunker intended for disposal purposes.

“**Land Protection Division**” (**LPD**) means the Land Protection Division of DEQ.

“**Permit**” means this Permit, all Permit Attachments, and all provisions and documents that are incorporated herein.

“**Permittee**” means Safety-Kleen Systems, Inc., Tulsa, Oklahoma, EPA ID# OKD000763821.

“**RCRA**” means the Resource Conservation and Recovery Act of 1980, as amended by HSWA in 1984.

“**RFA**” means RCRA Facility Assessment.

“**RFI**” means RCRA Facility Investigation.

**“Regional Administrator”** means the Regional Administrator of EPA Region VI, or his/her designee or authorized representative.

**“Release”** means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes or hazardous constituents into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

**“Solid Waste Management”** means the systematic administration of activities which provide for the collection, source separation, storage, transportation, transfer, processing, treatment, and disposal of solid waste.

**“Solid Waste Management Unit” (SWMU)** means any 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 any area at a facility at which solid wastes have been routinely and systematically released. The definition includes regulated units (i.e., landfills, surface impoundments, waste piles, and land treatment units) but does not include passive leakage or one-time spills from production areas and units in which wastes have not been managed (e.g., product storage areas).

If subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, DEQ may, at its discretion, apply the new definition to this Permit by modifying the Permit in accordance with 40 C.F.R. § 270.41.

## **E. EFFECT OF PERMIT**

The Permittee is allowed to store hazardous waste received from off-site in accordance with the conditions of this Permit. Any storage, treatment, or disposal of hazardous waste not authorized in this Permit is prohibited, unless exempted from permit requirements or approved by DEQ under a separate Administrative Order.

Subject to 40 C.F.R. § 270.4, compliance with this Permit generally constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the Permit which become effective by statute or are promulgated under 40 C.F.R. Part 268 restricting the placement of hazardous wastes in or on the land.

Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations. 40 C.F.R. §§ 270.4(b), 270.4(c), and 270.30(g).

Compliance with the terms of this Permit does not constitute a defense to orders issued or actions brought under the OHWMA to address an imminent and substantial endangerment, Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; §§ 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §§ 9601 *et seq.*, commonly known as CERCLA), or any other law providing for protection of public health or the environment from an imminent and substantial endangerment.

## F. PERMIT ACTIONS

### 1. Permit Modification, Revocation and Reissuance, and Termination

This Permit may be modified, revoked and reissued, or terminated for cause, as specified in 40 C.F.R. §§ 270.41, 270.42, and 270.43. The filing of a request for a Permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any Permit Condition. 40 C.F.R. §§ 270.4(a)(2) and 270.30(f). Except as provided in Permit Condition I.F.4, the term of this Permit shall not be extended by modification beyond the expiration date appearing on the face of this Permit. 40 C.F.R. § 270.50.

### 2. Permit Review

This Permit may be reviewed by DEQ at any time after the date of permit issuance and may be modified as necessary, as provided in 40 C.F.R. § 270.41.

### 3. Permit Renewal

This Permit may be renewed as specified in 40 C.F.R. § 270.30(b), OAC 252:205, and Permit Condition I.H.2. Review of any application for a permit renewal shall consider improvements in the state of control and measurement technology, as well as changes in applicable regulations. 40 C.F.R. § 270.32(d) and HSWA Sec. 212.

### 4. Permit Expiration

Pursuant to 40 C.F.R. § 270.50, this Permit shall be effective for a fixed term not to exceed ten (10) years. This Permit and all conditions herein will remain in effect beyond the Permit's expiration date if the Permittee has submitted a timely, complete application (see 40 C.F.R. §§ 270.10(h)(1) and 270.13 through 270.29) and, through no fault of the Permittee, DEQ has not issued a new permit, as set forth in 40 C.F.R. § 270.51. Permits continued under this section (Continued Permit) remain fully effective and enforceable. Pursuant to 40 C.F.R. § 270.51(c), when the Permittee is not in compliance with the conditions of the expired or expiring Permit, DEQ may choose to do any one or more of the following:

- a. Initiate enforcement action based upon the Continued Permit.
- b. Issue a notice of intent to deny the new permit under 40 C.F.R. § 124.6. If the permit is denied, the owner or operator would then be required to cease the activities authorized by the Continued Permit and be subject to enforcement action for operating without a permit.
- c. Issue a new permit under 40 C.F.R. Part 124 with appropriate conditions.
- d. Take other actions authorized by these regulations.

### 5. Permit Enforcement

When the Permittee is not in compliance with the conditions of the Permit, DEQ may do any or all of the following:

- a. Pursuant to 27A O.S. §§ 2-7-126, 2-7-127, 2-7-129, 2-7-130, 2-7-131 and/or 2-7-134, issue an order with penalties; require corrective action; temporarily suspend the Permit; revoke the Permit; and/or cause proceedings to be instituted in the district court for civil or criminal penalties.
- b. Issue a final denial of the new permit. If the permit is denied, the owner or operator shall cease the activities authorized by the Permit or be subject to enforcement action for operating without a permit.
- c. Take other actions authorized by 27A O.S. §§ 2-7-101 through 2-7-134, OAC 252:205-1 through 252:205-25, or other applicable laws or regulations.

6. Transfer of Permit

This Permit is not transferrable to any person, except after notice to DEQ. DEQ may require modification or revocation and reissuance of the Permit pursuant to 40 C.F.R. § 270.40. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 C.F.R. Parts 264 and 270 and this Permit. 40 C.F.R. §§ 270.30(1)(3) and 264.12(c).

**G. SEVERABILITY**

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not, except as otherwise provided by 40 C.F.R. § 124.16, be affected thereby.

**H. DUTIES AND REQUIREMENTS**

1. Duty to Comply

The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration that noncompliance is authorized by an emergency permit as noted by 40 C.F.R. § 270.61(b)(6). Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of OHWMA and RCRA and is grounds for enforcement action, Permit termination, revocation and reissuance, modification, or denial of a permit renewal application. 40 C.F.R. § 270.30(a).

2. Duty to Reapply

If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee shall submit a complete application for a new permit at least 180 days prior to Permit expiration. 40 C.F.R. §§ 270.10(h) and 270.30(b).

3. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit. 40 C.F.R. § 270.30(c).

4. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. 40 C.F.R. § 270.30(d).

5. Proper Operation and Maintenance

The Permittee shall always properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit. 40 C.F.R. § 270.30(e).

6. Duty to Provide Information

The Permittee shall furnish to DEQ, within a reasonable time, any relevant information which DEQ may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to DEQ, upon request, copies of records required to be kept by this Permit. 40 C.F.R. § 270.30(h).

7. Inspection and Entry

Pursuant to 40 C.F.R. § 270.30(i) and 27A O.S. § 2-3-501(A), the Permittee shall allow DEQ, or an authorized representative, upon the presentation of credentials and other documents, as may be required by law, to:

- a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit.
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit.
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit.
- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

8. Monitoring and Records

- a. Pursuant to 40 C.F.R. § 270.30(j)(1), samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The

method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 C.F.R. Part 261 or an equivalent method approved by DEQ. Laboratory methods must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846*, *Standard Methods of Wastewater Analysis*, or an equivalent approved method.

- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, the certification required by 40 C.F.R. § 264.73(b)(9), and records of all data used to complete the application for this Permit for a period of at least three (3) years from the date of the sample, measurement, report, record, certification, or application. These periods may be extended by request of DEQ at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility. 40 C.F.R. §§ 264.74(b) and 270.30(j)(2).
- c. Pursuant to 40 C.F.R. § 270.30(j)(3), records of monitoring information shall specify:
  - i. The date(s), exact place, and times of sampling or measurements.
  - ii. The individual(s) who performed the sampling or measurements.
  - iii. The date(s) analyses were performed.
  - iv. The individual(s) who performed the analyses.
  - v. The analytical techniques or methods used.
  - vi. The results of such analyses.

## **I. REPORTING REQUIREMENTS**

### **1. Reporting Planned Changes**

The Permittee shall give notice to DEQ, as soon as possible, of any planned physical alterations or additions to the permitted facility. 40 C.F.R. § 270.30(l)(1).

### **2. Reporting Anticipated Noncompliance**

The Permittee shall give advance notice to DEQ of any planned changes in the permitted facility or activity which may result in noncompliance with Permit requirements. 40 C.F.R. § 270.30(l)(2).

### **3. Incident Reporting**

- a. Upon release of materials that are or become hazardous waste whether by spillage, leakage, or discharge to soils or to air or to surface or to groundwaters (outside the limits of a discharge permit), or by other means, and which could threaten human health or the environment, the owner or operator shall immediately notify DEQ and take all necessary action to contain, remediate, and mitigate hazards from the release. OAC 252:205-13-1(a) and 40 C.F.R. § 270.30(l)(6).

- b. Pursuant to 40 C.F.R. § 270.30(l)(6)(ii) the description of the occurrence and its cause shall include:
    - i. Name, address, and telephone number of the owner or operator.
    - ii. Name, address, and telephone number of the facility.
    - iii. Date, time, and type of incident.
    - iv. Name and quantity of materials involved.
    - v. The extent of injuries, if any.
    - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable.
    - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
  - c. A written submission shall also be provided within five (5) days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. DEQ may waive the five-day written notice requirement in favor of a written report within fifteen (15) days. 40 C.F.R. § 270.30(l)(6)(iii).
4. Twenty-Four Hour Reporting
- a. The Permittee shall report to DEQ any noncompliance which may endanger health or the environment in accordance with 40 C.F.R. § 270.30(l)(6). Any such information shall be reported orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances. The report shall include the following:
    - i. Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.
    - ii. Any information of a release or discharge of hazardous waste, or of a fire or explosion from the hazardous waste management facility which could threaten the environment or human health outside the facility.
  - b. Pursuant to 40 C.F.R. § 270.30(l)(6)(ii) the description of the occurrence and its cause shall include:
    - i. Name, address, and telephone number of the owner or operator.
    - ii. Name, address, and telephone number of the facility.
    - iii. Date, time, and type of incident.
    - iv. Name and quantity of materials involved.
    - v. The extent of injuries, if any.
    - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable.
    - vii. Estimated quantity and disposition of recovered material that resulted from the incident.

c. A written submission shall also be provided within five (5) days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The DEQ may waive the five-day written notice requirement in favor of a written report within fifteen (15) days. 40 C.F.R. § 270.30(l)(6)(iii).

5. Monthly Reports

The Permittee shall submit monthly reports required by OAC 252:205-9-2.

6. Biennial Reports

The Permittee shall comply with the biennial reporting requirements of 40 C.F.R. § 264.75.

7. Manifest Reports

The Permittee shall comply with the manifest discrepancy reporting requirements of 40 C.F.R. § 264.72 and the unmanifested waste reporting requirements of 40 C.F.R. § 264.76.

8. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported in this section at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition I.I.4. 40 C.F.R. § 270.30(l)(10).

9. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the Permit Application or submitted incorrect information in the Permit Application or in any report to DEQ, the Permittee shall promptly submit such facts or information. 40 C.F.R. § 270.30(l)(11).

**J. SIGNATORY REQUIREMENT**

All applications, reports, or information submitted to or requested by the Director, his designee, or authorized representative, shall be signed and certified in accordance with 40 C.F.R. §§ 270.11 and 270.30(k).

**K. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO DEQ**

The Permittee shall ensure that all plans, reports, notifications, and other submissions to DEQ required in this Permit are signed and certified in accordance with 40 C.F.R. § 270.11. All reports, notifications, or other submissions which are required by this Permit should be sent by certified mail or hand-delivered to:

Chief Engineer  
Land Protection Division  
Oklahoma Department of Environmental Quality  
P.O. Box 1677  
707 North Robinson  
Oklahoma City, Oklahoma 73101-1677  
Phone Number (405) 702-5100

#### **L. CONFIDENTIAL INFORMATION**

In accordance with 40 C.F.R. § 270.12 and OAC 252:4-1-5(d) and 252:205-1-4, the Permittee may claim confidential any information required to be submitted by this Permit. Any such claim must be asserted at the time of submission in the manner prescribed on the application form or instructions, or in the case of other submissions, by stamping the words "confidential business information" on each page containing such information. If no claim is made at the time of the submission, EPA and DEQ may make the information available to the public without further notice. If a claim is asserted, the information will be treated in accordance with the procedures in 40 C.F.R. Part 2 (Public Information) and the Oklahoma Open Records Act, Title 51 O.S. § 24A.5. Claims of confidentiality for the name and address of any permit applicant or permittee will be denied.

#### **M. DOCUMENTS TO BE MAINTAINED AT THE FACILITY**

The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, the following documents and all amendments, revisions, and modifications to these documents:

- Waste Analysis Plan, as required by 40 C.F.R. § 264.13 and this Permit (Permit Attachment 2).
- Inspection schedules, as required by 40 C.F.R. § 264.15(b)(2) and this Permit (Permit Attachment 3).
- Personnel training documents and records, as required by 40 C.F.R. § 264.16(d) and this Permit (Permit Attachment 5).
- Current versions of procedures, structures, and equipment for prevention of hazards, mentioned in the Permit Application and as required by 40 C.F.R. §§ 270.14(b)(8) and (9).
- Contingency Plan, as required by 40 C.F.R. § 264.53(a) and this Permit (Permit Attachment 4).
- Operating record, as required by 40 C.F.R. § 264.73, and this Permit.
- Closure Plan, as required by 40 C.F.R. § 264.112(a) and this Permit (Permit Attachment 6).
- Annually adjusted cost estimate for facility closure, as required by 40 C.F.R. § 264.142(d) and OAC 252:205-9-5.

- A copy of this Permit, complete Permit Application, Notices of Deficiencies (NODs), Responses to NODs, and Permit modifications.

## SECTION II GENERAL FACILITY CONDITIONS

### A. DESIGN AND OPERATION OF FACILITY

The Permittee shall construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, groundwater, or surface water which could threaten human health or the environment, as required by 40 C.F.R. § 264.31 and OAC 252:205-9-1(a).

### B. REQUIRED NOTICES

#### 1. Hazardous Waste Imports

When receiving hazardous waste subject to 40 C.F.R. Part 262, Subpart H from a foreign source, the Permittee must comply with 40 C.F.R. §§ 264.12(a), 264.71(a)(3), and 264.71(d).

#### 2. Hazardous Waste from Off-Site Sources

When the Permittee is to receive hazardous waste from an off-site source it must inform the generator in writing that it has the appropriate permits and will accept the type of waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. 40 C.F.R. § 264.12(b).

### C. GENERAL WASTE ANALYSIS

#### 1. Test Methods

The Permittee shall follow the waste analysis procedures required by 40 C.F.R. § 264.13 and as described in the attached Waste Analysis Plan (WAP), Permit Attachment 2. The Permittee must notify DEQ of any changes to its WAP before implementing them. Changes to the WAP may require a permit modification in accordance with Permit Condition I.F.1. The Permittee shall repeat the analysis when it is notified or has reason to believe that the process or operation generating the waste has changed. 40 C.F.R. § 264.13(a)(3)(i) and OAC 252:205-9-6(a).

#### 2. Quality Assurance

The Permittee shall verify the analysis of each waste stream annually, at a minimum, as part of its quality assurance program, in accordance with *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, EPA Publication SW-846 or equivalent methods approved by DEQ. At a minimum, the Permittee shall maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations.

#### 3. Contract Laboratories

If the Permittee uses a contract laboratory to perform the analyses, then the Permittee shall inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this Permit. All analytical reports, chain-of-custody forms, and records related to contract laboratories must be maintained as part of the Permittee's operating record.

4. Hazardous Waste Inspections

The Permittee must inspect and, if necessary, analyze each hazardous waste shipment received at the Facility to determine whether it matches the identity of waste specified on the accompanying manifest or shipping paper. The analysis must be repeated if these inspections indicate that the hazardous wastes collected or received at the Facility does not match the identity of the waste designated on the accompanying manifest or shipping paper. 40 C.F.R. § 264.13(a)(3)(ii).

5. Recordkeeping

The Permittee shall maintain the results of all waste analyses and waste determinations in the facility operating record as required by 40 C.F.R. § 264.73(b)(3).

**D. PROHIBITED WASTES**

The following waste types from off-site sources are prohibited:

1. Explosive DOT Class 1 materials as defined in 49 C.F.R. § 173.50.
2. Radioactive DOT Class 7 materials as defined in 49 C.F.R. § 173.403.
3. Regulated medical wastes as defined in OAC 252:515-1-2.
4. Municipal solid waste from households. Household hazardous waste is allowed.

**E. SECURITY**

The Permittee shall comply with the security provisions of 40 C.F.R. § 264.14 and the Security Measures in Permit Attachment 3.

**F. GENERAL INSPECTION REQUIREMENTS**

The Permittee shall follow the inspection schedule set out in Attachment 3. The Permittee shall remedy any deterioration or malfunction discovered during an inspection, as required by 40 C.F.R. § 264.15(c). Records of inspections shall be kept, as required by 40 C.F.R. § 264.15(d).

**G. PERSONNEL TRAINING**

The Permittee shall conduct personnel training, as required by 40 C.F.R. § 264.16. This training program shall follow the training requirements in Appendix G of the Permit Application. The Permittee shall maintain training documents and records required by 40 C.F.R. §§ 264.16(d) and (e).

**H. SPECIAL PROVISIONS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE**

The Permittee shall comply with the requirements of 40 C.F.R. § 264.17. The Permittee shall follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in the Permit Application.

## **I. PREPAREDNESS AND PREVENTION**

The Permittee shall follow the procedures in the Permit Application and comply with 40 C.F.R. §§ 264.31 through 264.37.

### **1. Site Security and Fencing**

The Permittee shall comply with the security provisions of 40 C.F.R. § 264.14(b)(2) and (c), OAC 252:515-19-32, and Attachment 3. Fencing, gates, and signs shall be maintained to restrict access by unauthorized personnel.

### **2. Required Equipment**

At a minimum, the Permittee shall maintain at the Facility the equipment set forth in the Contingency Plan (Attachment 4) and as required by 40 C.F.R. § 264.32.

### **3. Testing and Maintenance of Equipment**

The Permittee shall test and maintain the equipment specified in Attachment 4, as necessary, to assure its proper operation in time of emergency, as required by 40 C.F.R. § 264.33.

### **4. Access to Communications or Alarm System**

The Permittee shall maintain access to the communication or alarm system, as required by 40 C.F.R. § 264.34.

### **5. Required Aisle Space**

At a minimum, the Permittee shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the Facility in an emergency as required by 40 C.F.R. § 264.35 and as specified in Attachment 3.

### **6. Arrangements with Local Authorities**

The Permittee shall maintain arrangements with state and local authorities, as required by 40 C.F.R. § 264.37(a). If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record in accordance with 40 C.F.R. § 264.37(b).

## **J. CONTINGENCY PLAN**

### **1. Requirement for Contingency Plan**

The Permittee must have a contingency plan designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. 40 C.F.R. § 264.51(a).

### **2. Implementation of Contingency Plan**

The Permittee shall immediately carry out the provisions of the Contingency Plan whenever there is a fire, explosion, or release of hazardous waste or

constituents that could threaten human health or the environment. 40 C.F.R. § 264.51(b).

3. Copies of Contingency Plan

The Permittee shall comply with the requirements of 40 C.F.R. § 264.53 by maintaining a current copy of the Contingency Plan at the Facility and submitting copies to all local police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services.

4. Amendments to Contingency Plan

The Permittee shall review and immediately amend the Contingency Plan, if necessary, as required by 40 C.F.R. § 264.54. Such amendment may require permit modification in accordance with 40 C.F.R. § 270.42. Copies of the amended plan shall be distributed as required by 40 C.F.R. § 264.53.

5. Emergency Coordinator

A trained emergency coordinator shall always be available in case of an emergency, as required by 40 C.F.R. § 264.55. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators shall be supplied to DEQ at the time of certification. This list is to be revised and promptly submitted to DEQ in case of personnel changes. 40 C.F.R. § 264.52(d).

**K. MANIFEST SYSTEM**

The Permittee shall comply with the manifest requirements of 40 C.F.R. Part 262 Subpart B and Part 264 Subpart E and OAC 252:205-5-5.

**L. GENERAL CLOSURE REQUIREMENTS**

1. Performance Standard

The Permittee shall close the Facility, as required by 40 C.F.R. § 264.111 and OAC 252:205-9-5 in accordance with Attachment 6.

2. Amendment to Closure Plan

The Permittee shall amend the Closure Plan, in accordance with 40 C.F.R. § 264.112(c), whenever necessary. Such amendment may require permit modification in accordance with 40 C.F.R. § 270.42.

3. Notification of Closure

The Permittee shall notify DEQ in writing at least forty-five (45) days prior to the date on which it expects to begin final closure of the Facility, as required by 40 C.F.R. § 264.112(d).

4. Time Allowed for Closure

Within ninety days (90) after receiving the final volume of hazardous waste, the Permittee shall treat or remove from the unit or facility all hazardous waste and

shall complete closure activities, in accordance with 40 C.F.R. § 264.113 and the schedules specified in Attachment 6.

5. Disposal or Decontamination of Equipment, Structures, and Soils

The Permittee shall decontaminate and dispose of all contaminated equipment, structures, and soils as required by 40 C.F.R. § 264.114 and Attachment 6.

6. Certification of Closure

The Permittee shall certify that the Facility has been closed in accordance with the specifications in the Closure Plan, as required by 40 C.F.R. § 264.115.

7. Partial Closure

Partial closure of any permitted storage or treatment unit(s) requires a permit modification using the procedure specified in I.F1. The request for a modification for partial closure must include a partial closure plan that meets the requirements of 40 C.F.R. Subpart G.

**M. COST ESTIMATE FOR FACILITY CLOSURE**

The Permittee must adjust the closure cost estimate for inflation within sixty (60) days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with 40 C.F.R. § 264.143 or upon such date as required by DEQ. 40 C.F.R. § 264.142(b).

The Permittee must revise the closure cost estimate whenever there is a change in the Facility's Closure Plan, as required by 40 C.F.R. § 264.142(c). A copy of the updated Closure Plan shall be submitted to and approved by DEQ prior to operation of a newly constructed unit. 40 C.F.R. § 264.112(c).

**N. FINANCIAL ASSURANCE FOR FACILITY CLOSURE**

The Permittee shall demonstrate continuous compliance with 40 C.F.R. § 264.143 by providing documentation of financial assurance, as required by 40 C.F.R. § 264.149 or 264.151, in at least the amount of the cost estimates required by Permit Condition II.M. Changes in financial assurance mechanism(s) must be approved by DEQ pursuant to 40 C.F.R. Part 264 Subpart H.

Prior to operation of a newly permitted or constructed unit, the Permittee shall update the closure financial assurance mechanism(s) as necessary and demonstrate that an adequately funded financial assurance mechanism(s) for closure is in effect.

**O. LIABILITY REQUIREMENTS**

The Permittee shall demonstrate continuous compliance with the requirement of 40 C.F.R. § 264.147(a) to have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

**P. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS**

The Permittee shall comply with 40 C.F.R. § 264.148, whenever necessary.

## **Q. SOLID WASTE (NON-HAZARDOUS) MANAGEMENT ACTIVITIES**

In addition to the hazardous waste activities described in this Permit, the Permittee is also permitted to operate this Facility as a Solid Waste Transfer/Processing Station for Non-Hazardous Industrial Waste (NHIW) as defined under OAC 252:515-31-2.

All solid waste operations shall comply with the rules in OAC 252:515.

In accordance with OAC 252:205-9-6(b), prior to receipt of any NHIW not identified as hazardous waste, the Permittee must obtain the following records and maintain them in the facility operating record:

### 1. Knowledge of Waste

Information regarding the chemical and physical nature of the waste which reasonably, considering the source, establishes that the waste does not exhibit any characteristic of hazardous waste as described by 40 C.F.R. Part 261, Subpart C. This information may include generator knowledge, laboratory analyses, material safety data sheets, analysis of raw materials or feedstocks, and process descriptions.

### 2. Generator Statement

An affidavit by the original waste generator stating that the waste does not include any listed hazardous waste.

The Permittee may not receive, store, process, or otherwise manage any waste materials meeting the description of Municipal Solid Waste, Used Tires, or Regulated Medical Waste, except for Household Hazardous Waste and solid wastes generated by the Facility (e.g., office trash, kitchen food waste, boxes, pallets, etc.). OAC 252:515-3-1(a) and 252:515-19-31.

## **R. DEPARTMENT OVERSIGHT AUTHORITY**

The principal function of the Permittee is waste management. DEQ reserves regulatory oversight authority to inspect and observe all activities and facilities that are or may be related to waste management at the Facility regardless of whether the activities or facilities are permitted by DEQ. Accordingly, no operations or structures which are or may be related to waste management shall be added or used without notice to DEQ and obtaining appropriate permit(s) as required.

## SECTION III CONTAINER STORAGE

### A. SECTION HIGHLIGHTS

There are three container storage areas permitted at this Facility. The east and west warehouses each have a container storage area and there is one freestanding metal storage shelter. Details of the container storage areas are included in Attachment 1, Attachment 7, and Appendix E.

The container storage areas are used to store wastes with Process Codes of S01, container storage, as shown in Appendix A - RCRA Part A Application. All container storage areas may be used to hold non-hazardous waste, 10-day transfer waste, and household hazardous waste provided the maximum storage capacity in each area is not exceeded. The container storage areas may also be used to store products that the Permittee uses or sells provided appropriate precautions are taken to separate incompatible materials and storage capacity limits are not exceeded.

#### 1. West Warehouse

The container storage in the west warehouse is 1,140 square feet (30' x 38') within a metal-framed building. The secondary containment consists of a diamond-plated steel liner within a 6" x 4" steel-reinforced concrete curb and a trench. The dimensions of the trench are 12' x 2' x 2.5' with a total containment volume of 448 gallons. Total secondary containment (including the curbing and trench) is 3,416 gallons. No more than 4,464 gallons of waste materials shall be stored in the area at any time. Wastes shall be stored in DOT-approved containers, ranging in size from 5 to 350 gallons.

#### 2. East Warehouse

The container storage in the east warehouse is 600 square feet (20' x 30') within a metal-framed building with a steel-reinforced concrete floor. The secondary containment consists of a diamond-plated steel liner within a 6" x 4" steel-reinforced concrete curb and two (2) trenches. The dimensions of the trenches are 12' x 2' x 2.5' with a total containment volume of 897 gallons. Total secondary containment (including the curbing and trench) is 4,076 gallons. No more than 6,912 gallons of waste materials shall be stored in the area at any time. Wastes shall be stored in DOT-approved containers, ranging in size from 5 to 350 gallons.

#### 3. Metal Shelter Drum Storage Area

The metal shelter container storage area is in a freestanding metal building that is located on the northeast side of the west warehouse building. The metal shelter is 300 square feet (20' x 15') and sits on a 20' x 36' concrete pad. The secondary containment consists of six (6) 10' x 5' x 0.5' metal pans for a total capacity of 1,122 gallons. No more than 2,184 gallons of waste shall be stored in this metal shelter at any time. Wastes shall be stored in DOT-approved containers, ranging in size from 5 to 85 gallons.

## **B. PERMITTED AND PROHIBITED WASTES**

### **1. Prohibited Waste**

The Permittee cannot accept waste identified in Permit Condition II.D and hazardous waste not listed in the Part A Application for storage in the container areas. Accepting hazardous waste means a transfer of custody after signing the manifest as the designated facility.

### **2. Storage of Incompatible Wastes**

The Permittee may not store waste which is incompatible with other wastes stored within a container management area unless precautions are taken to isolate the incompatible waste such as berms, containment pallets, or other appropriate methods.

## **C. CONDITION OF CONTAINERS**

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit. 40 C.F.R. § 264.171.

## **D. COMPATIBILITY OF WASTE WITH CONTAINERS**

The Permittee shall use containers made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste being stored, so that the ability of the container to contain the waste is not impaired, as required by 40 C.F.R. § 264.172.

The Permittee shall not store waste in containers which do not meet the specifications established by the DOT in 49 C.F.R. Parts 171 through 179.

## **E. MANAGEMENT OF CONTAINERS**

The Permittee shall keep all containers closed during storage, except when it is necessary to inspect, add, or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. 40 C.F.R. § 264.173.

## **F. SECONDARY CONTAINMENT SYSTEMS**

The Permittee shall maintain the secondary containment system in accordance with the design plans and specifications as submitted and approved. The secondary containment shall be maintained free of cracks or gaps, providing an impervious surface to contain leaks until the accumulated liquid can be removed. 40 C.F.R. § 264.175.

Spilled or leaked waste and accumulated precipitation must be removed from sumps or collection areas in a timely manner as required by 40 C.F.R. § 264.175(b)(5).

The Permittee may only store wastes that are compatible with the coating and construction materials used for that storage area.

## **G. REQUIRED AISLE SPACE AND STACKING ARRANGEMENTS**

The Permittee shall maintain aisle space in the container storage area sufficient to allow the unobstructed movements of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any portion of the container storage area. At a minimum, two (2) feet aisle spaces shall be maintained.

Thirty-gallon containers and larger sizes shall not be stacked more than two (2) high. Smaller containers may be stacked higher if precautions are taken to prevent accidental falls.

## **H. INSPECTION SCHEDULES AND PROCEDURES**

The Permittee shall inspect the containers and container storage areas each operating day in accordance with the inspection schedules in Attachment 3 and 40 C.F.R. § 264.174, to detect leaking containers, deterioration of containers, and the integrity of the containment system.

The Permittee shall place the results of all inspections in the facility operating record. 40 C.F.R. § 264.73(b)(5).

## **I. CLOSURE**

At closure of the container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the Closure Plan, Permit Attachment 6. 40 C.F.R. § 264.178.

## **J. SPECIAL PROVISIONS FOR IGNITABLE OR REACTIVE WASTE**

The Permittee shall not locate containers holding ignitable or reactive waste within fifty (50) feet of the facility's property line. 40 C.F.R. § 264.176.

The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures outlined in Attachment 3. 40 C.F.R. § 264.17(a)

## **K. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE**

1. The Permittee shall not place incompatible wastes in the same container, without the proper precautions. 40 C.F.R. § 264.177(a).
2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material. 40 C.F.R. § 264.177(b).
3. The Permittee shall separate containers of incompatible wastes. 40 C.F.R. § 264.177(c).
4. No incompatible waste storage locations shall utilize common sumps or collection areas for secondary containment.

## **L. SUBPART CC AIR EMISSIONS REQUIREMENTS FOR CONTAINERS**

The Permittee's containers are subject the provisions of 40 C.F.R. § 264.1086 when the average volatile organic concentration (VOC) of the waste is equal to or greater than 500 parts per million by weight (ppmw) at the point of waste origination.

1. Waste Determination

The Permittee must determine the average VOC for each waste stream as specified in Attachment 2 and required by 40 C.F.R. § 264.1083(a)(2).

2. Required Controls

The Permittee shall use controls specified in 40 C.F.R. § 264.1086 and Attachment 7 for waste with VOC equal to or greater than 500 ppmw at the point of origination.

- a. The Permittee shall manage hazardous wastes in containers greater than 26 gallons using the Level 1 controls required by 40 C.F.R. § 264.1086(c).
- b. The Permittee shall not manage hazardous wastes in light material service as defined by 40 C.F.R. § 264.1031 in containers greater than 122 gallons unless the appropriate Level 2 controls required by 40 C.F.R. § 264.1086(d) are used.

3. Reporting Requirements

In accordance with 40 C.F.R. § 264.1090(a), the Permittee shall report to DEQ each occurrence when hazardous waste is managed in a container in noncompliance with the conditions specified in 40 C.F.R. §§ 264.1082(c)(1) or (2). The Permittee shall submit a written report within fifteen (15) calendar days of the time that the Permittee becomes aware of the occurrence. The written report shall contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent recurrence of the noncompliance. The report shall be signed and dated by signatory for the permittee that meets the requirements of 40 C.F.R. § 270.11(a). 40 C.F.R. § 264.1090.

## **SECTION IV TANK STORAGE**

### **A. SECTION HIGHLIGHTS**

Spent aqueous and organic cleaning solutions from parts washers are accumulated in two (2) 8,000-gallon above-ground storage tanks via the Return and Fill Station, which includes drum washer/dumpster units. Containers of spent cleaning solutions are emptied into the drum washer/dumpster units. The drum washer/dumpster units are fitted with screens that filter out debris which is removed and placed in satellite accumulation containers. Sediment that accumulates in the bottom of drum washer/dumpster units is periodically removed and placed in satellite accumulation containers. The satellite accumulation containers are transferred to one of the permitted container storage areas when they are full. The Return and Fill Stations, including the drum washer/dumpster units, are ancillary equipment and subject to applicable requirements of 40 C.F.R. Part 264, Subpart J.

There is one (1) other tank within the contiguous secondary containment area that is not permitted for hazardous waste. This tank is used for storage of parts washer products the Permittee uses and sells to customers.

The above-ground tanks used for hazardous waste were designed in accordance with National Fire Protection Association standards and constructed of carbon steel painted white to reflect sunlight. The secondary containment includes a steel reinforced concrete slab and dike measuring 41' x 30' x 2' which holds 17,110 gallons. The dimensions of the hazardous waste tanks are 21' L x 8' D. The Return and Fill Station has secondary containment in the form a concrete slab and curb with the dimensions of 40' x 15' x 0.33'. The capacity of this containment is 1,495 gallons.

The tank system was installed before July 14, 1986, and is subject to the existing tank system design and installation requirements in 40 C.F.R. § 264.191. The definition of "existing tank system or existing component" is in 40 C.F.R. § 260.10.

### **B. DESIGN, INSTALLATION, AND REPAIRS**

#### **1. Replacement Tanks**

A replacement tank is a "new tank" and subject to the requirements of 40 C.F.R. § 264.192. The Permittee shall obtain a written assessment required by 40 C.F.R. § 264.192(a) for each new tank system, including replacement tanks, that is reviewed and certified by a qualified Professional Engineer, in accordance with 40 C.F.R. § 270.11(d), attesting that the tank system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste.

#### **2. Inspections**

The Permittee shall obtain a written inspection prior to placing a new tank system or component in use by an independent, qualified, installation inspector or a qualified Professional Engineer, either of whom is trained and experienced in the proper installation of tanks systems or components, in accordance with 40 C.F.R. § 264.192(b).

3. Major Repairs

A tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use, must be removed from service immediately, and the Permittee must satisfy all requirements under 40 C.F.R. § 264.196 before returning the tank system to use. When a tank system requires extensive repairs, the Permittee shall obtain and submit to DEQ a written certification from a qualified professional engineer, that attests the repaired system is capable of handling hazardous wastes without release for the intended life of the system as required by 40 C.F.R. § 264.196(f).

**C. PERMITTED AND PROHIBITED WASTES**

The Permittee is prohibited from storing waste in the tank that is not identified on the Part A Application with a process code of S02. The Permittee is prohibited from treating hazardous wastes in tanks. The Permittee shall not store more than 16,000 gallons of hazardous waste in the tank system.

**Tank Inventory within Secondary Containment**

<b>Tank Type</b>	<b>Capacity (gallons)</b>	<b>Dimensions</b>	<b>Hazardous Waste Storage</b>
Hazardous Waste Tank <sup>1</sup>	8,000	21' L x 8' D	Yes
Hazardous Waste Tank <sup>1</sup>	8,000	21' L x 8' D	Yes
Clean Product Tank <sup>2</sup>	8,000	21' L x 8' D	No

1. Includes waste 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.
2. The clean product tank is not subject to this Permit except as required to ensure adequate secondary containment for the tank system is provided.

**D. SECONDARY CONTAINMENT SYSTEMS**

The Permittee shall maintain the secondary containment systems in accordance with the design plans and specifications contained in Attachment 8 and Appendix E. The concrete floor, curbs, and walls shall be maintained free of cracks or gaps, providing an impervious surface to contain leaks until the accumulated liquid can be removed. 40 C.F.R. § 264.193.

Spilled or leaked waste and accumulated precipitation must be removed from sumps or collection area in a timely manner as required by 40 C.F.R. § 264.196(b).

**E. OPERATING REQUIREMENTS**

1. The Permittee shall operate and maintain the tanks in accordance with the Permit Application, including all attachments.

2. The Permittee shall not place hazardous wastes, non-hazardous wastes, or products in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. 40 C.F.R. § 264.194(a).
3. The Permittee shall prevent spills and overflows from the tank and containment systems as required by 40 C.F.R. § 264.194(b).
4. The Permittee shall obtain and maintain a detailed chemical analysis of the contained waste and must use analysis and knowledge of ignitability, corrosivity, reactivity, and toxicity of a waste, and other available information, to determine if the waste stream is compatible with the tank system. 40 C.F.R. § 264.17(b).
5. Non-hazardous waste, reagents, or products placed in tanks must be subsequently managed as a hazardous waste unless the Permittee first completes a closure of the tank in accordance with all applicable requirements of 40 C.F.R. Part 264 Subpart G, including a Closure Plan and Permit modification approved by DEQ. 40 C.F.R. §§ 261.3(a)(2)(iv), 264.112, and 270.42 and OAC 252:205-9-5.
6. The Permittee shall maintain and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in Attachment 8 and Appendix E. 40 C.F.R. §§ 264.193(b) through (f).
7. Valves in the common manifold between tanks shall remain closed unless actively adding or removing waste from a tank.

**F. SUBPART BB AND CC AIR EMISSIONS REQUIREMENTS FOR EQUIPMENT AND TANKS**

1. The Permittee has determined that the waste managed in the tank system is subject to “in heavy liquid service” requirements of 40 C.F.R. Part 264, Subpart BB and Level 1 requirements of 40 C.F.R. Part 264, Subpart CC. The Permittee shall comply with the controls, monitoring, maintenance, and recordkeeping requirements of these Subparts unless the Permit is modified in accordance with the procedures in 40 C.F.R. § 270.42.
2. Subpart BB monitoring and control requirements include, but are not limited to, the following:
  - a. Open-ended valves or lines – Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or second valve, which is in place to seal the opening except during operations requiring waste to flow through the line as required by 40 C.F.R. § 264.1056.
  - b. Pumps, valves, flanges, and other connectors – Any leak observed based on visual, audible, or olfactory inspection shall be assumed to be a leak detected as defined in 40 C.F.R. 264.1058(b). The equipment must be tagged with a weatherproof and readily visible identification, marked with the equipment identification number and the date the leak was detected. The tag shall be attached to the leaking equipment.

- i. When a leak is detected, it shall be repaired as soon as practicable, but not later than fifteen (15) calendar days after it is detected, except as provided in 40 C.F.R. § 264.1059.
  - ii. The first attempt at repair shall be made no later than five (5) calendar days after each leak is detected.
  - iii. After a valve has been repaired, it shall be visually monitored as part of the daily facility inspection. After two (2) successive months with no leak detection, the valve leak detection identification tag may be removed. For other equipment, such as pumps, the tag may be removed after a successful repair as provided in 40 C.F.R. § 264.1064(c)(2).
  - iv. When each leak is detected, the information required by 40 C.F.R. § 264.1064(d) shall be kept in the facility inspection log and operating record. The records shall reflect a leak was detected by visual, audible, or olfactory inspection in lieu of the information required by 40 C.F.R. § 264.1064(d)(5).
3. The Permittee shall comply with the Tank Level 1 controls required by 40 C.F.R. § 264.1084(c).

#### **G. RESPONSE TO LEAKS OR SPILLS**

As required by 40 C.F.R. §§ 264.196(a) through (f), in the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions:

1. Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release. 40 C.F.R. § 264.196(a).
2. Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify DEQ and demonstrate that a longer time period is required. 40 C.F.R. § 264.196(b).
3. If the collected material is a RCRA hazardous waste, it must be managed in accordance with all applicable requirements of 40 C.F.R. Parts 262-264. The Permittee shall note that if the collected material is discharged through a point source to U.S. waters or to a publicly owned treatment works, it is subject to requirements of the Clean Water Act. If the collected material is released to the environment, it may be subject to reporting under 40 C.F.R. Part 302.
4. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to air, soils, or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water. 40 C.F.R. § 264.196(c).

5. Close the system in accordance with the Closure Plan (Permit Attachment 6) unless the following actions are taken:
  - a. For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.
  - b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.
  - c. For a release to the environment caused by a leak from the above-ground portion of the tank system that does not have secondary containment, and can be visually inspected, the Permittee shall repair the tank system before returning it to service.
6. For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee shall not return a tank system to service unless it obtains certification by a qualified Professional Engineer in accordance with 40 C.F.R. § 270.11(d) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. 40 C.F.R. § 264.196(f).

#### **H. INSPECTION SCHEDULES AND PROCEDURES**

1. The Permittee shall inspect the tank systems in accordance with Permit Attachment 3 and shall complete the items in Permit Conditions IV.H.2 and IV.H.3 as part of those inspections.
2. The Permittee shall inspect the overfill controls in accordance with the Inspection Procedures in Permit Attachment 3. 40 C.F.R. § 264.195(a).
3. The Permittee shall inspect the following components of the tank system once each operating day:
  - a. Above-ground portions of the tank system to detect deterioration, corrosion, or releases of waste in accordance with 40 C.F.R. § 264.195(c)(1).
  - b. Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges) to ensure that the tank system is being operated according to its design in accordance with 40 C.F.R. § 264.195(b).
  - c. Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation) in accordance with 40 C.F.R. § 264.195(c)(2).
4. The Permittee shall document compliance with Permit Conditions IV.H.1 through IV.H.3 and place this documentation in the operating record for the facility. 40 C.F.R. § 264.195(h).
5. The Permittee is not required to perform inspections for a specific tank if the tank is emptied, drained, and purged of all hazardous waste. The Permittee is required

to document in the operating record the presence or absence of hazardous waste in each tank.

## **I. REPORTING REQUIREMENTS**

### **1. Releases of Hazardous Waste**

Releases of hazardous waste from the tank system or secondary containment system to the environment must be immediately reported to DEQ. 40 C.F.R. § 264.196(d)(1) and OAC 252:205-13-1(a). A leak or spill of one (1) pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported. 40 C.F.R. § 264.196(d)(2). In accordance with OAC 252:205-13-1(b), releases that are contained within a secondary containment system need not be reported. If the Permittee has reported the release pursuant to 40 C.F.R. Part 302, this report satisfies the requirements of this Permit condition. 40 C.F.R. § 264.196(d)(1).

Within thirty (30) days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to DEQ in accordance with 40 C.F.R. § 264.196(d)(3):

- a. Likely route of migration of the release.
- b. Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate).
- c. Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide DEQ with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires.
- d. Proximity of downgradient drinking water, surface water, and populated areas.
- e. Description of response actions taken or planned.

### **2. Major Tank Repairs**

The Permittee shall submit to DEQ all certifications required by IV.B.3 for major repairs to correct leaks within seven (7) days from returning the tank system to use.

### **3. Air Emissions Non-Compliance**

In accordance with 40 C.F.R. § 264.1090(a), the Permittee shall report to DEQ each occurrence when hazardous waste is managed in a tank in noncompliance with the conditions specified in 40 C.F.R. §§ 264.1082(c)(1) or (2). The Permittee shall submit a written report within fifteen (15) calendar days of the time that the Permittee becomes aware of the occurrence. The written report shall contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent recurrence of the

noncompliance. The report shall be signed and dated by an authorized representative of the Permittee.

**J. CLOSURE AND POST-CLOSURE CARE**

1. At closure of the tank system(s), the Permittee shall follow the procedures in Attachment 6. 40 C.F.R. § 264.197(a).
2. If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated in accordance with the Closure Plan, then the Permittee shall close the tank system(s) and perform post-closure care. 40 C.F.R. §§ 264.197(b) and (c).

**K. SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES**

1. The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail. The procedures specified in Permit Attachment 2 and 3 for ignitable and reactive wastes shall be followed. 40 C.F.R. § 264.198(a).
2. The Permittee shall 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). 40 C.F.R. § 264.198(b).

**L. SPECIAL TANK PROVISIONS FOR INCOMPATIBLE WASTES**

1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system. 40 C.F.R. § 264.199(a).
2. The Permittee shall not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste. 40 C.F.R. § 264.199(b).
3. No incompatible wastes stored in tanks shall utilize common sumps or collection areas for secondary containment.

## SECTION V SPECIAL CONDITIONS PURSUANT TO THE 1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) TO RCRA

### A. STANDARD CONDITIONS

#### 1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by 40 C.F.R. § 264.73(b)(9), a statement certified according to 40 C.F.R. § 270.11(d) specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to DEQ. The following are suggested criteria for the program:

- a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility.
- b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities.
- c. Any source reduction and/or recycling measures implemented in the last five (5) years or planned for the near future.
- d. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste.
- e. Factors that have prevented implementation of source reduction and/or recycling.
- f. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.).
- g. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option.
- h. A flow chart or matrix detailing all hazardous wastes it produces by quantity, type, and building/area.
- i. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste.

- j. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed.
- k. A description of the changes in volume and toxicity of waste achieved during the year in comparison to previous years.

2. Dust Suppression

Pursuant to 40 C.F.R. § 266.23(b), and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls, or any other hazardous waste (other than a waste identified solely based on ignitability), for dust suppression or road treatment.

3. Request for Permit Modification

a. DEQ-Initiated Modifications

If at any time DEQ determines that modification of this Permit is necessary, DEQ may initiate Permit modification proceedings in accordance with the regulations set forth at 40 C.F.R. § 270.41.

b. Permittee-Initiated Modifications

The Permittee may, where appropriate, initiate Permit modifications in accordance with the regulations set forth at 40 C.F.R. § 270.42. The Permittee shall follow all applicable requirements and procedures in initiating such proceedings.

c. Modification of Corrective Action Schedules of Compliance

The Permittee shall adhere to Corrective Action Schedules of Compliance (CASC) developed for newly identified and previously identified SWMUs covered by this Permit. If at any time the Permittee determines that such schedules cannot be met, the Permittee shall notify DEQ and submit a request for an extension of time with a justification as to why the current CASC cannot be met. Such extension is only effective if approved in writing by DEQ or otherwise approved in accordance with the provisions of this Permit.

4. Permit Review

This Permit may be reviewed by DEQ at any time after the date of Permit issuance and may be modified, as necessary. 40 C.F.R. § 270.41. Nothing in this section shall preclude DEQ from reviewing and modifying the Permit at any time during its term.

5. Compliance with Permit

In accordance with 40 C.F.R. § 270.4, compliance with a RCRA Permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the Permit which:

- a. Become effective by statute.

- b. Are promulgated under 40 C.F.R. Part 268 restricting the placement of hazardous wastes in or on the land.
  - c. Are promulgated under 40 C.F.R. Part 264 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of 40 C.F.R. § 270.42 Class 1 Permit modifications.
  - d. Are promulgated under 40 C.F.R. Part 265 Subparts AA, BB, or CC limiting air emissions.
6. Specific Waste Ban
- a. The Permittee shall not place in any land disposal unit the wastes specified in 40 C.F.R. Part 268 after the effective date of the prohibition unless the Regional Administrator has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.
  - b. The Permittee may store waste restricted under 40 C.F.R. Part 268 solely for the purpose of accumulation of quantities necessary to facilitate proper recovery, treatment, or disposal if it meets the requirements of 40 C.F.R. 268.50(a)(2) including, but not limited to, clearly marking each tank or container.
  - c. The Permittee is required to comply with all requirements of 40 C.F.R. § 268.7 as amended. Changes to the WAP will be considered a Permit modification at the request of the Permittee, pursuant to 40 C.F.R. § 270.42.
  - d. The Permittee shall perform a waste analysis at least biennially, when a process changes, when the results of the inspection require under 40 C.F.R. § 264.13(a)(4), or when requested by DEQ to determine whether the waste meets applicable treatment standards. The results shall be maintained in the operating record.
  - e. The Permittee must comply with requirements restricting placement of hazardous wastes in or on land which become effective by statute or promulgated under 40 C.F.R. Part 268, regardless of the requirements in this Permit. Failure to comply with the regulations may subject the Permittee to an enforcement action. 40 C.F.R. § 270.4(a)(1)(ii).

7. Information Submittal

Failure to comply with any condition of the Permit, including information submittal, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of Permit renewal application. Falsification of any submitted information is grounds

for enforcement action, modification, or termination of this Permit. 40 C.F.R. § 270.43.

The Permittee shall ensure that all plans, reports, notifications, and other submissions to DEQ required in this Permit are signed and certified in accordance with 40 C.F.R. § 270.11. One (1) hard copy and one (1) electronic copy for each of these plans, reports, notifications, or other submissions shall be submitted to DEQ by Certified Mail or hand-delivered to:

Chief Engineer  
Land Protection Division  
Oklahoma Department of Environmental Quality  
707 North Robinson  
P.O. Box 1677  
Oklahoma City, Oklahoma 73101-1677

8. Plans and Schedules Incorporated into Permit

All plans and schedules required by this Permit are, upon approval by DEQ, incorporated into this Permit by reference and become an enforceable part of this Permit. Since required items are essential elements of this Permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action under Section 3008 of RCRA which may include fines, suspension, or revocation of the Permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this Permit. Written requests for extensions of due dates for submittals may be granted by DEQ.

If DEQ determines that actions beyond those provided for, or changes to what is stated herein, are warranted, DEQ may modify this Permit.

9. Data Retention

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Permit shall be maintained at the facility during the term of this Permit, including any reissued Permits.

10. Management of Wastes

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable federal, state, and local requirements. Approval of units for managing wastes and conditions for operating the units, if approved, shall be granted through the permitting process.

## **B. SPECIFIC CONDITION – CLOSURE AND POST-CLOSURE**

### 1. Closure

The Permittee shall close the hazardous waste management areas in accordance with the Closure Plan, Permit Attachment 6. As required by 40 C.F.R. § 264.112(d)(1), the Permittee shall notify DEQ in writing at least forty-five (45) days prior to commencement of closure activities. Within sixty (60) days of completion of closure activities, the Permittee will submit certification to DEQ that the unit has been closed according to the approved Closure Plan. 40 C.F.R. § 264.115.

### 2. Post-Closure

DEQ will require post-closure care requirements should permitted units not achieve satisfactory closure standards.

## **C. CORRECTIVE ACTION**

### 1. Corrective Action for Releases

Section 3004(u) of RCRA, as amended by HSWA, and 40 C.F.R. § 264.101 require that Permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any SWMU at the facility, regardless of when the waste was placed in the unit.

### 2. Releases Beyond Facility Boundary

- a. The Permittee shall notify DEQ verbally within twenty-four (24) hours of discovery of any release of hazardous waste or hazardous constituents that has potential to migrate off-site.
- b. Section 3004(v) of RCRA, as amended by HSWA, and Federal regulations promulgated as 40 C.F.R. § 264.101(c) require corrective actions beyond the facility property boundary where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

### 3. Financial Responsibility

Assurance of financial responsibility for corrective action shall be provided as specified in the Permit following major modification for remedy selection.

## **D. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY IDENTIFIED SWMU(S) AND POTENTIAL AOC(S)**

The Permittee shall notify DEQ in writing of any newly identified SWMU(s) and potential AOC(s) (i.e., a unit or area not specifically identified during the RFA) discovered during ground water monitoring, field investigations, environmental

audits, or other means, no later than thirty (30) calendar days after discovery. The Permittee shall also notify DEQ of any newly constructed land-based SWMUs (including but not limited to surface impoundments, waste piles, landfills, land treatment units) and newly constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

- a. The location of the newly identified SWMU or potential AOC on the topographic map required in 40 C.F.R. § 270.14(b)(19). Indicate all existing units (in relation to other SWMUs).
- b. The type and function of the unit.
- c. The general dimensions, capacities, and structural description of the unit (supply any available drawings).
- d. The period during which the unit was operated.
- e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC.
- f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU or whether the AOC should be considered a SWMU.

Based on the results of this notification, DEQ will designate the newly identified AOC(s). Based on the results of this notification or investigation conducted, DEQ will determine the need for further investigation or corrective measures at any newly identified SWMU(s) or AOC(s). If DEQ determines that such investigations are needed, DEQ may require the Permittee to prepare a plan for such investigations.

#### **E. NOTIFICATION REQUIREMENTS FOR NEWLY DISCOVERED RELEASES AT SWMU(s) AND AOC(s)**

The Permittee shall notify DEQ in writing, no later than fifteen (15) calendar days after discovery, of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. Such newly discovered releases may be from newly identified SWMUs or AOCs, newly constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the RFA, completed RFI, or investigation of an AOC(s), DEQ had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification. DEQ may require further investigation and/or interim measures for the newly identified release(s) and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the RFI Workplan or a new RFI Workplan. The Permit will be modified to incorporate the investigation, if required.

## **F. INTERIM MEASURES**

### **1. Permit Incorporation**

If, during the course of any activity initiated under the Permit, DEQ determines that a release or potential release of hazardous constituents poses a threat to human health and the environment, DEQ may require interim measures. DEQ shall determine the specific measures or require the Permittee to propose measures that control or minimize the threat. The interim measures may include a Permit modification, a schedule for implementation, and a written plan. DEQ shall notify the Permittee in writing of the requirement to perform interim measures. DEQ shall modify this Permit to incorporate interim measures into the Permit.

### **2. Factors to be Considered by DEQ in Determining the Need for Interim Measures**

- a. Time required to develop and implement a final remedy.
- b. Actual and potential exposure to human and environmental receptors.
- c. Actual and potential contamination of drinking water supplies and sensitive ecosystems.
- d. The potential for further degradation of the medium in the absence of interim measures.
- e. Presence of hazardous wastes in containers that may pose a threat of release.
- f. Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water.
- g. Weather conditions that may affect the current levels of contamination.
- h. Risks of fire, explosion, or accident.
- i. Other situations that may pose threats to human health and the environment.

## **G. RFI WORKPLAN**

For any newly identified SWMU(s), an RFI Workplan shall be submitted to DEQ within one hundred and eighty (180) days of identification. The RFI Workplan must address releases from SWMU(s) of hazardous waste or hazardous constituents to all media. DEQ will review for approval the RFI Workplan and any supplement plans and documentation.

## **H. RFI IMPLEMENTATION**

Upon receipt of written approval from DEQ for the RFI Workplan, the Permittee shall implement the RFI in accordance with the schedules and information outlined in the approved Workplan. Deviations from the approved RFI Workplan which are necessary during implementation of activities must be approved by DEQ and fully documented and described in the RFI Final Report.

**I. RFI FINAL REPORT AND SUMMARY**

Within ninety (90) calendar days after completion of the RFI, or in accordance with an alternative schedule approved by DEQ, the Permittee shall submit an RFI Final Report and Summary. The RFI Final Report shall describe the procedures, methods, and results of all investigations.

**J. DETERMINATION OF NO FURTHER ACTION**

Should an RFI be required, the Permittee may, based on the results of the RFI and/or other relevant information, apply to DEQ for a Class III Permit modification under 40 C.F.R. § 270.42(c) to terminate the RFI/CMS process for a specific unit. This Permit modification application must contain information demonstrating that there are no releases of hazardous waste including hazardous constituents from a particular SWMU at the Facility that pose a threat to human health and/or the environment, as well as additional information required in 40 C.F.R. § 270.42(c). If, based upon review of the Permittee's request for a permit modification, the results of the RFI, and other information, including comments received during any public comment period required for Class III Permit modifications, DEQ determines that releases or suspected releases which were investigated either are non-existent or do not pose a threat to human health and/or the environment, DEQ may grant the requested modification.

If necessary to protect human health or the environment, a determination of no further action shall not preclude DEQ from requiring continued or periodic monitoring of air, soil, groundwater, or surface water when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

A determination of no further action shall not preclude DEQ from requiring further investigations, studies, or remediation at a later date if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the Facility that is likely to pose a threat to human health or the environment. In such a case, DEQ shall initiate a modification to the Permit.

**K. CORRECTIVE MEASURES STUDY (CMS) PLAN**

If CMS work is required, this Permit shall be modified to include requirements for a CMS Plan.

**L. CMS IMPLEMENTATION**

If CMS work is required, this Permit shall be modified to include requirements for CMS implementation.

**M. CMS FINAL REPORT AND SUMMARY**

If the Permittee identifies additional SWMUs or AOCs, this Permit may be modified to include requirements for a CMS Final Report and Summary.

**N. CORRECTIVE MEASURE SELECTION AND IMPLEMENTATION**

If the Permittee is required to perform additional corrective measures, this Permit may be modified to include corrective measure selection and implementation requirements.

FACILITY DESCRIPTION

**ABSTRACT**

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

Responsible Official: Boz Cannon  
Branch Manager

Facility Address: Safety-Kleen Systems, Inc.  
16319 East Marshall St  
Tulsa, OK 74116

Telephone Number: 918-234-5185

U.S. EPA Identification Number: OKD 000 763 821

Geographic Location: 36° 10' 22.7" N  
95° 47' 42.5" W  
Rogers County

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

Date Operations Began: January 1, 1978

Description of Activities: This facility is a collection point for many spent materials generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately transported to a Safety-Kleen recycling facility or other properly permitted facility for processing.

Property Description: Approximately 3.2 acres with the following structures:

- a. Two buildings with offices and warehouses for container storage;
- b. One tank farm with three aboveground storage tanks (two contain spent parts washer solvent,

- and one contains clean product parts washer solvent)
- c. A permitted metal shelter used for container storage
- d. One loading dock with a return and fill station

Facility Type: Storage in an above ground tanks (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (gallons)	SECONDARY CONTAINMENT (gallons)	MATERIAL TO BE STORED
Container Storage Area (West Warehouse)	4,464	3,416	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) <sup>1</sup>  Spent Aqueous Brake Cleaning Solution (D039) <sup>1</sup> Drum Washer / Dumpster Sediment (D001) <sup>1</sup>  Spent Immersion Cleaner (D006) <sup>1</sup>  Dry Cleaning Waste (D001 or F002) <sup>31</sup>  Paint Waste (D001, F003, F005) <sup>1</sup>  Photographic Imaging Waste (D011) <sup>1</sup>  Contaminated Debris (F002, F003, F005) <sup>2</sup>
Container Storage Area (East Warehouse)	6,912	4,076	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) <sup>1</sup>  Spent Aqueous Brake Cleaning Solution (D039) <sup>1</sup>  Drum Washer / Dumpster Sediment (D001) <sup>1</sup>  Spent Immersion Cleaner (D006) <sup>1</sup>

			<p>Dry Cleaning Waste (D001 or F002) <sup>1</sup></p> <p>Paint Waste (D001, F003, F005) <sup>1</sup></p> <p>Photographic Imaging Waste (D011) <sup>1</sup></p> <p>Contaminated Debris (F002, F003, F005) <sup>2</sup></p>
<p>Container Storage Area (Metal Shelter)</p>	<p>2,184</p>	<p>1,122</p>	<p>Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) <sup>1</sup></p> <p>Spent Aqueous Brake Cleaning Solution (D039) <sup>1</sup></p> <p>Drum Washer / Dumpster Sediment (D001) <sup>1</sup></p> <p>Spent Immersion Cleaner (D006) <sup>1</sup></p> <p>Dry Cleaning Waste (D001 or F002) <sup>1</sup></p> <p>Paint Waste (D001, F003, F005) <sup>1</sup></p> <p>Photographic Imaging Waste (D011) <sup>1</sup></p> <p>Contaminated Debris (F002, F003, F005) <sup>2</sup></p>
<p>Tanks</p>	<p>16,000</p>	<p>17,110</p>	<p>Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) <sup>1</sup></p> <p>Spent Aqueous Brake Cleaning Solution (D001) <sup>1</sup></p>

<sup>1</sup> In addition to the code(s) listed above, these waste codes may be applicable:  
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

<sup>2</sup> In addition to the code(s) listed above, these codes may be applicable:  
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

## **1.0 FACILITY DESCRIPTION [40 CFR 270.14(b)(1)]**

### **1.1 DESCRIPTION OF BUSINESS ACTIVITY**

Safety-Kleen Systems, Inc. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance, and dry cleaning services. The company has been operating since 1968, offering solvent collection and reclamation services for its customers, most of whom generate less than 1,000 kilograms (2,200 pounds) of hazardous waste per month. Safety-Kleen is a leading provider of containerized waste services, vacuum services, total project management and other environmental services to a wide array of customers in the automotive, metalworking, manufacturing, and other end markets.

The Tulsa Service Center typically operates Monday through Friday, from 7 a.m. to approximately 6 p.m. The Branch General Manager is responsible for the facility's operations. In the event of his/her absence, qualified personnel will assume the responsibility.

Currently, the Tulsa Service Center offers several services that involve the accumulation, transfer and storage of spent materials. These materials are transported from the Service Center to one of the Safety-Kleen recycle centers or an independent reclaimer. The following sections contain a description of each of these services.

Appendix A-1 includes the Landowner Notification Affidavit required by OAC 252:4-7-13(b).

#### **1.1.1 Parts Cleaner Service**

The original service offered by the Company in 1968 was the parts cleaner service, which remains the primary business activity. This service involves the leasing of degreasing units, which consist of a reservoir and a degreasing area. The reservoir contains a degreaser such as petroleum naphtha solvent, immersion cleaner solvent, or aqueous cleaner. On a regularly scheduled basis, a Safety-Kleen representative cleans and inspects the parts cleaner unit and replaces the reservoir of spent material with clean (most often recycled) product.

The Safety-Kleen representative then transports the parts cleaning solution back to the Tulsa Service Center. The spent petroleum naphtha solvent is transferred from the containers to storage tanks and containers of product are prepared for the next day's services. Used cleaning solutions may also be transferred to the facility's container storage areas. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the spent

solvent at the Service Center. Approximately two-thirds of the solvent used by Safety-Kleen customers is reclaimed with the remainder being purchased from a vendor.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service (COMS), provides a material reclamation service to these customers regardless of machine model.

A second type of parts cleaner, the immersion cleaner machine, removes varnish and gum from such equipment as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container containing a non-halogenated hydrocarbon mixture. The spent material remains in the container after delivery to the Service Center, where it is stored in the container storage areas (CSAs) in the warehouse. Periodically, a box trailer truck is dispatched to deliver containers of fresh solvent and collect the containers of spent solvent for reclamation.

A unique feature of this system is that Safety-Kleen provides a “closed loop” system for the recycling of spent solvents. Safety-Kleen delivers clean recycled solvent to the customer and picks up the spent solvent, and transports the spent solvent to Safety-Kleen Recycle Centers where it is distilled into recycled solvent. The recycled solvent or virgin solvent is provided to the customer as part of a machine lease agreement or as part of a COMS service agreement.

A third type of parts cleaner service is available from Safety-Kleen, which utilizes an aqueous cleaning solution. The aqueous parts cleaning units are similar to the petroleum naphtha solvent-based units. On a regularly scheduled basis, a Safety-Kleen representative cleans and inspects the parts cleaner unit and replaces spent material with clean product. A Safety-Kleen representative collects the containers of spent material and stores them in a contained area at the Service Center. Periodically, a box trailer truck is dispatched to deliver containers of fresh solvent and collect the containers of spent solvent.

### **1.1.2 Dry Cleaner Service**

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents. These wastes are containerized on the customers' premises and are periodically collected by a Safety-Kleen representative. The containerized waste is accumulated in a contained area of the warehouse prior to transport to a Safety-Kleen accumulation center, recycle center, or other permitted facility.

### **1.1.3 Paint Waste Collection Service**

In 1986, Safety-Kleen initiated a paint waste reclamation program to service the automobile body repair business. Paint gun cleaning machines are leased to customers with a reservoir of lacquer thinner. On a periodic basis the reservoir is replaced and the spent thinner is transported back to the Tulsa Service Center for shipment to a reclamation facility. Wastes containing various thinners and paints are also collected in containers on the customers' premises. A Safety-Kleen representative collects these containers and stores them in the CSAs at the facility. These wastes are transported to a Safety-Kleen Recycle Center or other reclamation facility and the regenerated solvent is distributed to Safety-Kleen customers for use as a product.

### **1.1.4 Aqueous Cleaning Solution**

Spent aqueous cleaning solution is a by-product of brake and/or parts cleaning operations involving aqueous-based cleaners. Based on Safety-Kleen's experience, a small percentage of the cleaning solution may be contaminated from sprays used in shops which have not all together eliminated the use of chlorinated solvents. Although only a small percentage of spent aqueous cleaning solution will be contaminated with solvents, Safety-Kleen considers it prudent to manage spent aqueous cleaning solution as hazardous, unless the generator has analytical data to prove otherwise or generator knowledge that he/she does not use chlorinated solvents in their operations.

Depending on transportation options, Safety-Kleen may choose to ship the containerized aqueous cleaning solution in its original container, commingle the spent aqueous cleaning solution with the spent parts washer cleaning solvent solution in the return and fill drum washer/dumpster unit, or commingle the spent aqueous cleaning solution with other aqueous cleaning solutions. If commingled with spent parts washer solvent solution, this material is then transferred and stored in the facility's bulk waste storage tanks. The commingled solution is shipped via a tanker truck to a recycling facility in the same manner as spent parts washer cleaning solution. Empty containers are rinsed and the rinsate is managed as facility-generated waste. If the aqueous solution is commingled with other aqueous solution, the commingled solution is shipped to a recycling facility.

### **1.1.5 Photographic Imaging Waste Collection Service**

In 1994, Safety-Kleen began offering a photographic waste reclamation program to the medical and dental service industries and photo-imaging facilities. In addition, Safety-Kleen offers a metal replacement unit with two self-contained cartridges in series for silver-bearing wastes. The unit

is serviced on a regularly scheduled basis by a Safety-Kleen representative who cleans and inspects the unit and replaces the self-contained cartridges with new ones. Wastes containing solution and film negatives are collected in containers on the customer's premises. The Safety-Kleen representative collects these containers and transports them to the facility. The wastes are shipped to a metal reclaimer for precious metal reclamation.

#### **1.1.6 Oil and Oily Water**

Used oil and oily water is collected at customer locations in containers. The containers are transported back to the Tulsa Service Center and stored in the CSAs for future shipment to a Safety-Kleen recycle center.

#### **1.1.7 Transfer Wastes**

Safety-Kleen may also manage other industrial wastes such as solvents, debris, spill cleanup, plating wastes etc., which may be hazardous. These wastes are shipped from the generator to the Tulsa Service Center in various DOT-approved containers. These wastes are managed at the service center on a transfer (10-day) basis.

#### **1.1.8 Household Hazardous Waste**

Safety-Kleen also offers a service for the collection of household hazardous waste. The containers are transported back to the Tulsa Service Center and are stored in the CSAs for future shipment to a Safety-Kleen recycle center.

### **1.2 DESCRIPTION OF THE FACILITY [40 CFR 270.14(b)(1)]**

The Tulsa Service Center has been operating as a storage facility since January 1, 1978. The facility consists of the following structures:

- a. A 3,853 square foot warehouse with offices and a contained area for container storage (west warehouse)
- b. A 7,650 square foot warehouse with offices and a contained area for container storage (east warehouse)
- c. A 300 square foot enclosed metal shelter used for container storage.

- d. Three 8,000-gallon aboveground storage tanks. Two are used for spent parts washer solution/spent aqueous solutions. One is used to store the clean parts washer solution product.
- e. A solvent return and fill station with a loading dock and two drum washer/dumpster units with a storage capacity of 162 gallons each.

Descriptions of the surrounding area and of waste management practices at the Tulsa Service Center follow.

Applicable maps and facility drawings are in Appendix C.

### **1.2.1 Solid Waste Management Units**

The five solid waste management units associated with this facility are the two container storage areas in the warehouses (west and east), the metal storage building, the solvent return and fill station, and the tank farm. The units are used for storage in tanks (S02) and containers (S01). The location of the units, general dimensions and structural descriptions can be found in the associated maps located in Appendix C. The units have been in service at the location since January 1, 1978. Wastes managed in the units can be found in the Facility Description Abstract. There have been no releases at this facility from one of the SWMUs, but in the event of a release from one of the SWMUs, available information pertaining to the release of hazardous waste would be provided to the DEQ.

### **1.2.2 Regional Description**

The Tulsa Service Center is located in Rogers County, Oklahoma approximately 625 feet east of the intersection of Marshall Street and 161<sup>st</sup> East Avenue. This area is zoned for light industrial use. To the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may be in conflict with Safety-Kleen's operations at this site.

Rogers County covers approximately 675 square miles. The City of Tulsa has a population of approximately 689,000 (2023). Rogers County is part of the Tulsa metropolitan area and is an urban/suburban area. Rogers County has a temperate, continental climate of the moist, subtropical type. The average summer (June-August) high temperatures range between 88 and 93°F. Winds from the south bring warm air and high humidity, but not high precipitation rates. Average summer

months' rainfall is approximately 4 inches. Average total annual precipitation is 39 inches with 9 inches of that being snow. The average winter (December-February) high temperatures range between 47 and 53°F. Average winter lows range between 26 and 31°F. The area's climate is described as "temperate", meaning there are marked seasonal contrasts in temperature and precipitation and with occasional extremes in both temperature and precipitation. Tornadoes and damaging hailstorms are relatively common in the county. The Service Center is located above the 100-year floodplain.

The surface geology of the Tulsa Service Center consists of Claremore silt loam soil which was formed under prairie grasses on limestone uplands. This soil consists of shallow, well-drained, moderately permeable, gently sloping (0-3%) soils. Overburden is approximately 1.5 feet thick in the area of the service center. The Tulsa Service Center is about 760 feet above sea level and the property slopes towards the southwest. Surface runoff is to Mingo Creek which is about 3.5 miles west of the site. Wetlands exist within ¼ mile east of the Tulsa Service Center. There are no sanitary or storm sewers serving the facility. Domestic sewage collects in a septic tank and surface water is transported by way of ditches adjacent to Marshall Street.

The water table in this area is typically greater than 6 feet below the land surface. There is no significant aquifer in the immediate vicinity of the service center. Most wells in the area yield only a fraction of a gallon to a few gallons per minute. Surface runoff is collected in reservoirs and stored for use. The nearest reservoir to the Tulsa Service Center is approximately 20 miles north of the facility. The water supply of the Tulsa Service Center is from a water main supplied by the City of Tulsa.

None of the following exist within ¼ mile of the facility:

- Public water supply wells
- Schools
- Parks
- Critical habitats
- Oil or gas wells

The non-building areas of the facility are paved with concrete or gravel, as noted on the site plan in Appendix C. The majority of the vehicular traffic and loading/unloading operations occur at or near the return and fill station and at or near the entrances to the warehouses (west and east) all of these areas are paved with concrete. The entrance to the facility is on Marshall Street and is 625 feet east of the intersection of 161<sup>st</sup> East Avenue and Marshall Street. Interstate 44, running east-west in the region, serves as the major access road to the Tulsa Service Center. Safety-Kleen vehicular traffic exits at 161<sup>st</sup> East Avenue and travels north approximately 0.5 mile to Marshall Street. The access

road was designed in accordance with engineering criteria appropriate for sustaining traffic volume in this area. This site is located in an industrial area with roads have a load-bearing capacity of 20,000 pounds per axle load, adequate for industrial users. The route trucks that travel the daily routes between the Service Center and customers use the two-lane approach driveway. The trucks dispatched from the Recycle and Accumulation Centers to deliver fresh materials/solvents, and pick up used solvents perform the activities at the aboveground tank area, at the return and fill area, or at the entrances to the warehouses.

The box trailers dispatched from the Recycle Centers pick up containers weekly from the Tulsa Service Center. This includes containers of spent parts washer solvent, immersion cleaner, dumpster sediment, dry cleaning waste, paint waste, photographic waste, aqueous cleaner waste, spent industrial fluids, and other transfer wastes. Service Center trucks exit the facility in the morning with containers of clean solvent and return at the end of the business day with containers of waste.

The tanker trucks which serve the Tulsa Service Center typically use the east gate for both entry and exit to and from the facility (this may change if necessary and the tanker may enter/exit through the west gate also).

### **1.2.3 Waste Management Practices**

The Tulsa Service Center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The CSA, aboveground storage tanks, and the return and fill all have secondary containment and the Service Center has the equipment necessary for employees to safely manage wastes onsite. Appendix C, Maps and Facility Drawings, contain drawings of the waste management facilities.

Proper handling of hazardous waste is ensured through proper training. Employees are trained on hazardous waste procedures during their initial training and then annually.

The CSAs in both warehouses and the metal shelter are for the storage of (1) spent parts washer solvent, (2) spent aqueous parts washer solvent, (3) spent aqueous brake cleaner, (4) drum washer/dumpster sediment, (5) spent immersion cleaner (6) dry cleaning wastes, (7) paint wastes, (8) photographic imaging wastes, (9) contaminated debris, and (10) transfer wastes. The wastes are stored in properly labeled containers to indicate their contents. These containers are inspected each operating day, typically Monday through Friday, to ensure they are properly labeled and that the 10-day transfer limit is not exceeded. Other materials and products which are not regulated may also be stored in this area.

The CSA in the west warehouse is a 1,140 square foot area (30' x 38') within a metal-framed building. It has secondary containment in the form of a diamond-plated steel liner with 6" x 4" steel-reinforced concrete curb and a trench. The dimensions of the trench are 12' x 2' x 2.5' with a total containment volume of 448 gallons. Total secondary containment (including the curbing and trench) is 3,416 gallons. No more than 4,464 gallons of waste materials will be stored in the CSA at any time.

The CSA in the east warehouse is a 600square foot area (20' x 30') within a metal-framed building with a steel-reinforced concrete floor. It has secondary containment in the form of a 6" x 4" concrete curbing and two 12' x 2' x 2.5' trenches. Combined containment of the two trenches is 897 gallons. Total secondary containment (including curbing and trenches) is 4,076 gallons. No more than 6,912 gallons of waste will be stored in the CSA at any time.

The metal shelter drum storage area is a 300 square foot (20' x 15') free-standing building. It has secondary containment in the form of six 10' x 5' x 6" metal pans at its base and has a total containment volume of 1,122 gallons. No more than 2,184 gallons of waste materials will be stored in the building at any time.

Waste containers will be stored on pallets (where feasible) and adequate aisle space will be maintained in the CSAs. Containers will be moved with a forklift, pallet jack, or drum dolly.

At the Tulsa Service Center, spent parts cleaning solvents and spent aqueous solutions are accumulated in two 8,000-gallon aboveground storage tanks via the return and fill station. Containers of spent parts cleaning solvents and spent aqueous solutions are emptied into a drum washer/dumpster unit in the return and fill station. Material in the drum washer/dumpster is pumped into the spent solvent storage tanks. The return and fill station has secondary containment in the form of a 40' x 15' x 4" epoxy-coated concrete slab at its base with a total containment capacity of 1,495 gallons. The aboveground tanks have been designed in accordance with NFPA standards and are constructed of carbon steel and are designed to be compatible with the materials stored within them. The tanks' exteriors are painted a light color to reflect sunlight and minimize corrosion by protecting the steel. Any corrosion that may develop will be easily observed due to the light color of the paint.

The secondary containment for the solvent tank farm is a steel reinforced concrete slab and dike measuring approximately 41' x 30' x 2' with a secondary containment capacity of 17,110 gallons. There are three 8,000-gallon aboveground storage tanks located in the tank farm. Two are for spent parts washer solvent and one is for clean parts washer solution. Each tank is equipped with an audiovisual high-level alarm.

**WASTE ANALYSIS PLAN ABSTRACT**

<b>WASTE DESCRIPTION</b>	<b>EPA WASTE CODES</b>	<b>ESTIMATED FACILITY CAPACITY<sup>1</sup></b>	<b>ESTIMATED ANNUAL AMOUNT<sup>2</sup></b>
Spent Parts Washer Solvent	D001 <sup>3</sup>	29,560 <sup>4,5</sup>	1,431
Bottom Sediment from Waste Tanks	D001 <sup>3</sup>	NA	Variable
Spent Immersion Cleaner	D006 <sup>3</sup>	13,560 <sup>4</sup>	37
Dry Cleaning Waste	D001 or F002 <sup>3</sup>	13,560 <sup>4</sup>	181
Paint Waste	D001, F003, and F005 <sup>3</sup>	13,560 <sup>4</sup>	94
Drum Washer/Dumpster Sediment	D001 <sup>3</sup>	13,560 <sup>4</sup>	69
Aqueous Brake Cleaner Solution	D039 <sup>3</sup>	29,560 <sup>4,5</sup>	35
Aqueous Parts Cleaning Solution	<sup>3</sup>	29,560 <sup>4,5</sup>	39
Photographic Imaging Waste	D011 <sup>3</sup>	13,560 <sup>4</sup>	5
Contaminated Debris	F002, F003, F005 <sup>6</sup>	13,560 <sup>4</sup>	34

<sup>1</sup>The estimated facility capacity in gallons

<sup>2</sup>The estimated annual amount in thousands of gallons

<sup>3</sup>In addition to the code(s) listed above, these codes may be applicable: 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

<sup>4</sup>The total amount of containerized waste stored in the west warehouse will not exceed 4,464 gallons, the total amount stored in the east warehouse will not exceed 6,912 gallons, and the total amount stored in the metal shelter will not exceed 2,184 gallons

<sup>5</sup>The total amount of spent parts washer solvent and spent aqueous solution stored in the waste tanks will not exceed a maximum of 16,000 gallons.

<sup>6</sup> In addition to the code(s) listed above, these codes may be applicable: 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

## 2.0 WASTE ANALYSIS PLAN [40 CFR 270.14(b)(3)]

### 2.1 DESCRIPTION OF WASTES

Several types of waste result from the servicing of Safety-Kleen customers and maintenance of the facility. Descriptions of these wastes are as follows:

#### 2.1.1 Wastes Resulting from the Parts Washer Service

Spent parts washer cleaning solvent and spent aqueous solutions are accumulated in two 8,000-gallon aboveground storage tanks via the return and fill station. Containers of parts washer waste are emptied into the drum washer in the return and fill station, which in turn, empties into the tanks. Additionally, parts washer wastes may also be managed in containers. This waste handling method results in the following types of parts washer solvent waste:

- a. Spent Parts Cleaning Solvents and Spent Aqueous Solutions: The spent parts cleaner solvent is removed from the tank by a tanker truck on a varying schedule. This waste is ignitable (D001) and may exhibit the toxicity characteristics: 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. The spent parts washer waste will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.
- b. Bottom Sediment in the Tanks: Periodically, it is necessary to remove sediment and other heavy material from the bottom of the tanks. A vacuum truck is typically used for this purpose. The sediment may be ignitable (D001) and may exhibit the toxicity characteristics: 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 is transported to a Safety-Kleen Recycle Center or other properly permitted facility.
- c. Dumpster Washer/Dumpster Sediment: Sediment also accumulates in the bottom of the drum washer in the return and fill station. This sediment is typically removed manually with shovels or scoops. It is placed in a satellite accumulation container in the return and fill area and moved to a container storage area once full. The chemical composition of this waste is analogous to that of the bottom sediment from the tank. This waste sediment will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

d. Spent Immersion Cleaner: This waste remains in the container in which it was originally used until it is received at the recycle center. The immersion cleaner may exhibit the toxicity characteristics: 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. The waste immersion cleaner will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

e. Aqueous Brake Cleaner Waste: This waste may be placed into the spent parts cleaner tanks, bulked onsite into larger DOT-approved containers and stored in any of the CSAs, or remain in the container in which it was originally used/transported until it is received at the Recycle Center. The aqueous parts cleaner waste may exhibit the following toxicity characteristics: 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 transported to a Safety-Kleen Recycle Center or other properly permitted facility.

### **2.1.2 Wastes Resulting from Dry Cleaner Service**

Dry cleaning wastes consist of spent filter cartridges, separator water, powder residue from diatomaceous or other powder filter systems, still bottoms, and other dry cleaning solvent contaminated wastes. These wastes are packaged on the customer's premises in containers. While approximately 95 percent of the dry cleaning waste that customers generate is perchloroethylene waste (F002), the remaining generate waste that contains either mineral spirits/petroleum naphtha (D001), trichloro-trifluoroethane (F002), or 1,1,1-trichloroethylene (F002). The dry cleaning waste may exhibit the following toxicity characteristics: 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. The waste remains in the container in which it was originally packaged until it is received at a Safety-Kleen Recycle Center or other properly permitted facility. Mineral spirits and trichloro-trifluoroethane wastes are managed as transfer wastes at the facility.

### **2.1.3 Wastes Resulting from Paint Gun Cleaner Service**

Paint wastes consist of various lacquer thinners such as acetone, isopropyl alcohol, methyl ethyl ketone, toluene, xylene and acetate compounds (D001, F003, and F005) and may also exhibit the following toxicity characteristics: 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. The wastes are packaged on the customer's premises. These containers may be stored in any or all of the CSAs. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

#### **2.1.4 Photographic Imaging Waste Collection Service**

Photographic imaging wastes consist of fixer and developer solutions, other associated photographic solutions and waste containing silver and film negatives. Photographic imaging wastes exhibit the toxicity characteristic D011. The wastes are packaged on the customer's premises. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

#### **2.1.5 Contaminated Debris**

Solid and liquid debris wastes are typically accumulated at the return and fill station and in the east and west warehouses, however, additional satellite contaminated debris drums may be found at various locations throughout the facility. Typically, wastes such as rags, wipes, gloves, sampling equipment, absorbents, etc. are placed in satellite containers. Once the satellite containers are full, they are moved to a CSA until shipped to a Safety-Kleen Recycle Center or other properly permitted facility. The contaminated debris may carry the following waste codes: 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.

## **2.2 QUALITY CONTROL PROCEDURES**

Spent materials are the primary feedstock for the generation of Safety-Kleen recycled solvent products. As a result, quality control of the spent materials is necessary to monitor product quality and regulatory consistency. The Tulsa facility collects spent materials from thousands of customers, most of whom are small quantity generators, and containers containing recoverable solvents are returned to the Service Center for shipment to a Recycle Center or other permitted facility. With such large numbers of waste generators and waste shipments, performing detailed analyses at the facility is economically and logistically infeasible.

Most of the materials collected at the Service Center are managed in the closed loop system and are usually collected from a company with a single process. 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. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the Service Centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

If Safety-Kleen has been notified or has a reason to believe that the process or operation generating the waste has changed, or when there is indication that the waste collected does not match that designated on the manifest or shipping document, the waste generation process will be further evaluated with the generator to determine acceptability. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

### **2.2.1 Parts Cleaner Service**

Prior to leasing a parts cleaning machine or placing a COM (customer owned machine) 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), the process is reviewed to ensure that the solvent is protected from the sources of contamination. In reviewing a customer's business, the Safety-Kleen Representative provides parts washer customers with written and verbal information on use of the parts washer unit. This information 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

Safety-Kleen conducts qualitative/visual analysis as a part of all parts washer and immersion cleaner services. 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 representatives and the likelihood of contamination is remote.

Safety-Kleen Representatives are instructed to visually examine the spent solvents (parts washer and immersion cleaner) when the machines are serviced, noting the quantity, odor, and appearance of the material recovered as follows:

- a. The quantity of used solvent in the drum – When the amount of parts cleaner solvent or immersion cleaner liquid is more than 25% greater than originally supplied, the

container will not be accepted. 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 a site specific profile is completed to determine its acceptability. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.

- b. The odor of the liquid in the container – Personnel must never make an effort to “sniff” the solvent. However, if in the normal course of servicing the customer, the odor of the liquid in the container is noticed to be different from that of parts cleaner solvent or immersion cleaner the container will not be accepted. 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 a site specific profile is completed to determine its acceptability. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.
  
- c. The appearance of the liquid in the drum – The spent parts cleaner solvents have a normally greenish-brown or black appearance. Certain contaminants containing dyes and color pigments (such as transmission fluid, printers' ink, and water-based paints) may change the color of the spent parts cleaner solvent to other colors. Spent immersion cleaner should have a dark brown to almost black appearance. If the liquids in the containers deviate from the above description or which contain substantial amounts of water, and/or high density solvent at the bottom will not be accepted. 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 a site specific profile is completed to determine its acceptability. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.

It should be noted that tank bottoms waste and drum washer/dumpster sediment waste are generated as a result of processing parts washer waste. The safeguards outlined in 2.2.1 (a through c) ensure the waste streams remain consistent.

At the Service Center, the Safety-Kleen representative or the material handler again observes the quantity, odor, and appearance prior to emptying the parts cleaner solvent into the wet dumpster. If drums have questionable contents, the waste generation process will be further evaluated with the generator to determine its acceptability. All other containers (immersion cleaner,

aqueous parts cleaning solvent) are verified upon receipt at a Recycle Center. In addition, receipt analysis is performed by the Safety-Kleen Recycle Centers on all inbound bulk spent solvent deliveries; including a screen for atypical flash point, PCBs, and halogenated organics.

### **2.2.2 Dry Cleaner and Paint Waste Collection Service**

The dry cleaner and paint wastes are collected from facilities where typically there is one process and the possibility of cross-contamination from other chemicals or wastes is minimal. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

### **2.2.3 Transfer Waste (also known as Containerized Waste Service)**

Containerized Waste Service (CWS) are collected from primarily industrial customers. CWS wastes may include cleaning solvents, halogenated solvents (F001, F002, F004), acids and caustics (D002), lacquer thinners and paint wastes (D001, F003, F005), imaging wastes (D011), and various coolants. CWS wastes may exhibit any or all of the waste codes that are designated for Transfer Waste in the Waste Analysis Plan Abstract.

The service involves picking up containerized wastes from the generators and transporting them to the facility for storage. The containers are accumulated in the container storage areas of the facility prior to transport to a Safety-Kleen Accumulation Center, Recycle Center, or other properly permitted facility. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

### **2.2.4 Photographic Imaging Waste Collection Service**

Photographic imaging wastes are the result of developing and fixing of photos. Wastes are collected from facilities where typically one process is managed and the possibility of cross-contamination from other wastes or chemicals is minimal. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

Samples of this waste are collected at the Recycle Center or other properly permitted facility. The contents are either verified and accepted, or the container is rejected. Rejected wastes are either returned to the customer or properly disposed at an approved facility.

**2.3 RECHARACTERIZATION OF WASTE STREAMS (QUALITATIVE ANALYSIS) [40 CFR 270.14(b)(2)]**

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 are evaluated annually through the Safety-Kleen Recharacterization Process (Quantitative Analysis).

Analytical data from the Recharacterization sampling is subjected to an EPA SW846 approved statistical model. The Safety-Kleen Tulsa facility is included each year as part of the Annual Recharacterization sampling.

Samples included in the Annual Recharacterization process are selected from random customers at selected Safety-Kleen facilities.

The waste streams collected by Safety-Kleen are uniform across business types and geographical locations. This is demonstrated by the minimal changes in the codes assigned to each stream through the Annual Recharacterization statistical evaluation each year. Homogeneity of the streams was further confirmed in 2004. In 2004, Safety-Kleen conducted an Annual Recharacterization using California customer data only. Safety-Kleen then conducted a statistical comparison of the 'California only' Annual Recharacterization result with the results from the National Annual Recharacterization (Exhibit D-3). 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 Recharacterization 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 Recharacterization process for 2024 were:

<b>CUSTOMER GENERATED</b>	<b>SAFETY-KLEEN GENERATED</b>
Immersion Cleaner	Spent Mineral Spirits Parts Washer Solvent Tank Bottoms (bulk)
Spent Mineral Spirits Parts Washer Solvent	Bulk Tank Spent Mineral Spirits Solvent
Paint Gun Cleaner/Paint Wastes	Spent Mineral Spirits Parts Washer Solvent Sludge/Drum Washer Mud

Dry Cleaning Related Streams (Perc and Naphtha, filters, bottoms, and separator water)	Branch Contaminated Debris
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Final 2024 Annual Recharacterization (National) Waste Code Assignments are included in Exhibit D-2.

The purpose of the Recharacterization is to conduct a waste determination and 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 Recharacterization 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. Streams expected to be phased out of the Recharacterization program in coming years include the Dry Cleaning related streams and Paint Gun Cleaner/Paint Wastes streams. Lastly, a set of analytes may be omitted if they are not expected or demonstrated to not be present in a waste stream. Pesticides and herbicides have never been included in the Recharacterization process as these constituents are not allowed in wastes picked up by Safety-Kleen. Analysis for semivolatiles is in the process of being phased out as codes for semivolatiles have never been assigned.

Note: All samples pulled during the Recharacterization sampling event are identified by customer and date. If the analytical from a sample pulled during the Recharacterization process determines a customer's waste is non-conforming, that customer's waste will be excluded from the Safety-Kleen core waste program. Future pickups of waste from any non-conforming customer will be profiled and managed as 10-day transfer waste.

Details on the Statistical Method employed by Safety-Kleen for its Annual Recharacterization process are included in Exhibit D-1. As noted in this Exhibit, the Statistical method has been developed and is conducted in accordance with U.S. EPA SW846 Chapter 9 (September 1986) guidance on determining if a waste is hazardous. The Annual Recharacterization Sample Testing Protocol is located in Exhibit C-4.

#### **2.4 WASTE ANALYSIS PLAN UPDATE [40 CFR 270.14(b)(3)]**

This Waste Analysis Plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is the responsibility of the corporate Environmental Compliance Department.

## **2.5 LAND BAN NOTIFICATION / CERTIFICATION FORMS [40 CFR 268]**

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfill disposal.

This notice is required paperwork for all Safety-Kleen waste types. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the Notice is kept in the files of the receiving/terminating facility.

## **2.6 SUBPART CC COMPLIANCE [40 CFR 264 SUBPART CC]**

The Safety-Kleen Tulsa Service Center shall control air pollutant emissions for applicable hazardous waste management units at this facility pursuant to the requirements of RCRA Subpart CC, through implementation of this compliance program.

This plan describes this facility's waste determination procedures, tank and container design/management practices, organic emission controls, inspection and monitoring, and recordkeeping and reporting requirements, pursuant to standards promulgated under RCRA Subpart CC.

### **2.6.1 WASTE DETERMINATION PROCEDURES [40 CFR 264.1083(a)(1)]**

#### **Waste Determination**

For purposes of waste determination, the facilities utilize knowledge developed in the Waste Characteristics portion of the sites' hazardous waste permit. On an annual basis, the waste streams are recharacterized by collecting small retain samples of each waste shipment arriving at a Safety-Kleen Recycle Center for a period of several weeks. Analyses are performed on composite samples, including flash point, pH, specific gravity, and TCLP (metals, volatiles, and semi-volatiles). Other analyses are performed throughout the year as necessary. In addition, the facility 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 all hazardous waste managed in tanks or applicable containers at the facility may contain an average volatile organic concentration of greater than 500 ppmw at the point of waste generation. Therefore, all hazardous wastes managed in tanks or applicable containers shall be managed in accordance with applicable Subpart CC control

standards. Under such a management scenario, no direct measurements will be conducted. This is consistent with 40 CFR 264.1083(a).

### **Point of Waste Origination**

The point of waste origination for all hazardous wastes generated from off-site sources and transported to a Safety-Kleen Service Center in DOT authorized containers, which will subsequently be managed in tanks or containers on-site, is the facility boundary at the entrance gate.

For hazardous waste generated on-site, the point of waste origination is the point of hazardous waste generation, as defined under hazardous waste regulations.

### **2.6.2 CONTAINER STANDARDS (40 CFR 264.1086)**

Containers managing hazardous wastes generally fall into three categories.

1. Hazardous waste containers less than 26 gallons in capacity are wholly exempt from consideration under Subpart CC. Containers of hazardous wastes that are transferred through the facility are “still in the course of transportation” and therefore are exempt from Subpart CC.
2. Containers with capacities between 26 gallons and 122 gallons are all Level 1 containers. The Level 1 containers have covers that are designed with no gaps, holes, cracks, or other open spaces into the container. In addition, all containers used to handle hazardous waste meet U.S. DOT Performance Oriented Packaging Standards.
3. Containers of greater than 122 gallons that manage hazardous wastes at this facility are not in light service and are Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container.

### **Level 1 Containers [40 CFR 264.1086(c)]**

Provided below is a summary of the criteria applicable for a container to be identified and managed as a Level 1 container.

Level	Volume	Usage	Requirements
Level 1	> 26 gallons but ≤ 122 gallons  OR  ➤ 122 gallons	Any hazardous waste  Not “in light material service”	- Meet DOT specs or is a lab pack - Keep closed except when adding or removing waste  - Safety relief devices - Minimize exposure of waste when transferring, - Remediate defective containers within 5 days, initiate within 24 hours

A hazardous waste is a “light material” if it (1) contains at least one organic constituent with a vapor pressure above 0.3 (kPa) at 20°C, and (2) has a total concentration of such constituents of 20% or greater by weight. This definition will generally apply to all hazardous waste received at the facility in non-bulk containers.

Level 1 containers typically received and managed by this facility include, but are not limited to include 30-gallon, 55-gallon, 250-gallon or 330-gallon containers. These containers meet applicable DOT specifications and/or authorizations. Therefore, these containers are acceptable for use in accordance with Level 1 controls. Containers greater than 26-gallons managing site generated hazardous waste will be visually inspected upon their initial filling and within one year if the container is not completely emptied of its contents.

**2.6.2.1 Inspections [40 CFR 264.1086(c)(4)]**

Hazardous Waste Received from Off-Site – All hazardous waste received from offsite sources are received in containers. All Level 1 containers managing hazardous waste subject to Subpart CC received from off-site sources that will not be completely emptied within 24 hours of receipt will be inspected to ensure that all applicable covers and closure devices are closed. This inspection already occurs as part of the daily facility inspection. Therefore, compliance with the inspection requirements of Subpart CC is incorporated in the facility inspection plan by this reference.

Defective containers will be remediated within 24 hours of observation, and initial remediation will be attempted within 12 hours of observation.

On-Site Generated Hazardous Waste – Containers greater than 26 gallons will be visually inspected upon their initial filling to ensure that all openings are properly closed and/or covered. Satellite accumulation containers managed in accordance with 40 CFR 262.15 are not subject to Subpart CC requirements.

**2.6.2.2 Monitoring [40 CFR 264.1088]**

Containers Managing Off-Site Hazardous Waste – Level 1 containers managed at the Service Center are not subject to monitoring for no detectable emissions (NDE). Therefore, no monitoring for NDE will be conducted on such containers. However, they will be closed when not involved in transfer activities.

**2.6.2.3 Transferring Hazardous Waste [40 CFR 264.1086(c)(3)(i),(ii)]**

Container To Container – This type of transfer will typically be done at the Service Center when it is necessary to remove waste from a damaged container to a non-damaged container that will provide containment for the waste, or to place the entire container into a larger container. An example would be placing a 55-gallon container into an 85-gallon salvage drum. This may occur for both liquid and solid wastes. Only container openings that are necessary to add or remove waste from each container will be open during the transfer. This activity will be conducted in accordance with 40 CFR 264.1086(c)(3)(ii) for Level 1 containers.

Container To Tank – This type of transfer involving liquids will be done regularly for Level 1 containers. Following is an explanation of this activity.

Spent mineral spirits from parts washers is accumulated in (2) 8,000-gallon aboveground storage tanks via the return and fill station. Typically, 16- and 30-gallon containers (and occasionally 55-gal) are poured into the dumpster in the return and fill station, and the material in the dumpster is pumped into the spent solvent storage tank. The return and fill station has secondary containment in the form of reinforced concrete slab and curbs.

**2.6.3 TANK STANDARDS [40 CFR 264.1084]**

Safety-Kleen will manage organic wastes at the Service Center in the waste mineral spirits storage tanks. The waste mineral spirits storage (WMSS) tanks will manage hazardous waste with 500 ppmw or greater VO Concentration. Therefore, these tanks are subject to Level 1 controls. Please note, there is one other storage tank at the Service Center, but it is not utilized to store hazardous waste and therefore is exempt from regulation under Subpart CC.

The WMSS tanks are non-pressurized, horizontal, aboveground storage tanks. They are constructed with a fixed roof and each is 21' long and 8' high. Each WMSS tank has an 8,000-gallon storage capacity. The tank is constructed of 3/16" thick (1/4" thick in the lower third of the tank)

carbon steel. The tank has an exterior coating of white paint. The tank is constructed in accordance with Underwriters Laboratories Standard 142. The waste in this tank exhibits a vapor pressure of less than 5.2 kPa (.75 psia). The measured vapor pressure of the waste managed in tanks is = 0.2 psia. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 265.1084(c)(4).

All of the tanks present at this Service Center are designed so that all opening covers can be closed with no visible gaps, holes, cracks, or other open spaces into the interior of the tank. The cover and all cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position at all times except when waste is being added to or removed from the tanks, or when necessary sampling or repair/maintenance is performed on the tanks.

The tanks are vented to the atmosphere through a safety device (pressure vacuum vent) which has been designed to operate with no detectable organic emissions when the device is in the closed position. These tanks are equipped with pressure vacuum vents that operate at 2oz of pressure and 1oz of vacuum. In addition, these tanks are designed with a man way pressure relief device which remains in the closed position when not in use to relieve pressure.

Below is a summary of the criteria that must be met in order for Safety-Kleen's hazardous waste tank to be subject to Level 1 controls.

<b>Tank Design Capacity</b>	<b>Maximum Vapor Pressure of Waste</b>
<19,789 Gallons	11.26 psi
>19,789 Gallons - < 39,841 Gallons	4.0 psi
>39,841 Gallons	0.75 psi

### **2.6.3.1 Level 1 Tank [40 CFR 264.1084(c)]**

The Level 1 tank must be managed with a fixed roof. All openings in the tank systems must be closed except when adding, removing, or conducting routine maintenance on the tanks. Safety devices and conservation vents are allowed on such tanks.

The WMSS tanks store waste mineral spirits. Vapor pressure testing performed on the product SK 150 Mineral Spirits showed the results as .004 psia at 68°F.

Since the material has a vapor pressure that is significantly lower than the maximum threshold of 11.26 psia for Level 1 tanks, Safety-Kleen Systems, Inc. has determined that the hazardous waste storage tanks at the Service Center has a design capacity of less than 19,789 gallons, therefore the waste materials are subject to Level 1 controls.

The vapor pressure of the waste in the tank will fluctuate on a periodic basis due to the cyclic generation of hazardous waste streams by off-site generators. The maximum vapor pressure in the hazardous waste tank will not exceed the applicable Level 1 threshold. The maximum organic vapor pressure is determined using process knowledge of the hazardous waste historically managed pursuant to 40 CFR 265.1084(c)(4).

#### **2.6.4 CLOSED VENT SYSTEMS AND CONTROL DEVICES ( 40 CFR 264.1087)**

This standard is not applicable because the hazardous waste management unit (i.e. tanks and containers) requiring such control equipment, in accordance with RCRA Subpart CC, are not managed at this facility.

#### **2.6.5 INSPECTION AND MONITORING (40 CFR 264.1088)**

Visual inspection of the tank closure devices will be conducted on an annual basis. In addition, the hazardous waste storage tanks are inspected during the facility's daily inspection. This daily inspection includes check of the high level alarm and of the volume (according to the gauge) held in the tank. Sudden deviations in the solvent volumes will be investigated and the cause determined. If necessary, repairs will be initiated immediately. The hazardous waste solvent must not exceed 95% of the tank volume at any time. The piping and secondary containment for tank is checked for leaks, cracks, or other deterioration. Any damage to the tank, piping (such as rust, seepage, or loose fixtures) must be noted and repairs initiated.

### **2.7 MISCELLANEOUS UNITS [40 CFR SUBPART X]**

#### **2.7.1 Summary**

Safety-Kleen Systems, Inc. does not have any miscellaneous units on site, therefore this section does not apply.

## PREPAREDNESS AND PREVENTION PLAN

### ABSTRACT

SECURITY MEASURES: The site is secured as follows:

1. There is a chain link fence topped with 3 strands of barbed wire surrounding the facility.
2. Warning signs are posted at all entrances
3. Locks are on all entrances to the warehouse and on the metal shelter
4. Remote controls for all tank operations are located inside the west warehouse
5. There is nighttime outdoor lighting

INSPECTION PROCEDURES: See Appendix E for an example Facility Inspection Record

REQUIRED EQUIPMENT: The emergency equipment requirement is met with the following:

1. Internal communications will be by voice or phone
2. Telephones are available in the office and the warehouse
3. Fire extinguishers are available at numerous locations in the warehouse, office, tank farm, return and fill and metal shelter as indicated on the Emergency Equipment Plan in Appendix F
4. Water is available from the City of Tulsa for various uses throughout the facility (i.e., emergency eyewash and shower). Water for fire fighting is available from a nearby fire hydrant.
5. Spill containment equipment is available near storage and material handling areas.

### **3.0 PREPAREDNESS AND PREVENTION PLAN [40 CFR 264 SUBPART C]**

#### **3.1 SECURITY MEASURES [40 CFR 270.14(b)(4)]**

The facility is secured with a six-foot-high chain link fence topped with 3 strands of barbed wire surrounding the facility. All access gates are locked when the facility is unoccupied. The facility has warning signs stating "Danger-Unauthorized Personnel Keep Out," (or similar language) which are visible from twenty-five feet, posted at the entrances. In addition, outdoor lights are on at night.

The office/warehouse buildings are secured with locks on all outer doors, and warning signs are posted at all entrances to work and waste storage areas. The container waste storage areas are located in the warehouses (east and west) and metal shelter, which are locked during non-working hours. The tanks are inaccessible in that material can not be added or removed unless the pumps are activated, the controls for which, are located inside the west warehouse. The pumps are not activated unless parts cleaner solvent product or waste is being added to or removed from the tanks by Safety-Kleen personnel. As a result, the tank and container storage areas are inaccessible except by Safety-Kleen personnel.

#### **3.2 INSPECTION PROCEDURES [40 CFR 270.14(b)(5)]**

The Service Center Manager (i.e., the Branch General Manager) or his designate is responsible for carrying out and documenting the facility inspection. The inspection will be conducted by an employee familiar with facility operations and inspection procedures. This may be the Branch General Manager, a Material Handler (warehouse person), Branch Administrator, Sales Representative, or a Sales Manager. The inspector must make a record of the inspection in an inspection, note any repairs that are needed, and assure that they are completed. If he cannot carry out the repairs, he must notify the appropriate Safety-Kleen Corporate Department and request assistance. Completion of repairs also must be noted on the Facility Inspection Record. Records of inspections will be kept for three years from the date of inspection. See Appendix E for example inspection forms.

The facility inspections include the following:

- a. Tank Inspections – At a minimum, the tanks holding product and spent materials are inspected each operating day, typically Monday through Friday. The inspections include checks of the high level alarm and of the volume held in each tank. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. The solvent waste must not exceed 95% of the volume at any time. The power to the high level alarm must be

checked each operating day; it will sound when the tank's volume is 95% of capacity. All storage tanks at this facility are equipped with high level alarm systems.

The piping and secondary containment for the tanks must be checked for cracks or other deterioration. Insulated piping will be visually inspected for evidence of leaks. Any damage to tanks and piping (such as rust or loose fixtures) or secondary containment must be noted and repairs initiated.

Annually the tank is inspected per 40 C.F.R. § 264.1084(c)(4)(ii) using the example inspection form provided in Appendix E. The condition of the tank (fixed roof and closure devices) are checked annually for, but not limited to, visible cracks, holes or gaps in the roof sections or between the roof and tank wall, cracked or damaged seals or gaskets on the closure device, broken, warped, or missing hatches, access covers, caps or other closure devices, gaps present between closure device and tank, vents obstructed, and other defects.

- b. Solvent dispensing equipment – The solvent dispensing equipment is inspected each operating day, typically Monday through Friday. The solvent dispensing hose, connections, and valves must be inspected for damage (such as cracks or leaks) and proper functioning. The pumps, pipes, and fittings must also be checked for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired.
- c. Container Storage Areas (CSA) – The container storage areas are inspected each operating day, typically Monday through Friday. The condition of the containers are noted. The total volume of the waste held in the CSAs will not exceed the permitted volume for the area. The contents of any leaking or suspect containers must be placed in a container of adequate integrity. The containers will be properly labeled and marked in accordance with U.S. DOT and Oklahoma DEQ hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, repairs will be initiated immediately.
- d. Drum washer/dumpster units – The wet dumpster units (in the return and fill station) must be inspected each operating day, typically Monday through Friday, for leaks and sediment buildup. Any leaks must be noted and repair must be initiated immediately. Excess sediment must be removed from the drum washer/dumpsters.

The secondary containment must be checked for cracks and gaps. If cracks are detected, repairs will be initiated immediately.

- e. Safety Equipment – The safety equipment is inspected weekly. The fire extinguishers must be checked to ensure that the units are charged and accessible. The operation of the telephone and the eyewash units must be confirmed. The first aid kit and spill clean up equipment must be inspected for adequate content and accessibility. A list of emergency equipment is provided in Appendix F.
  
- f. Security – The operation of each gate and lock must be checked weekly. In addition, the fence must be inspected for deterioration weekly.
  
- g. Air Emission Standards –The facility does not operate process equipment for which the RCRA Subpart AA air emission standards apply. However, the facility utilizes several pumps, valves and other equipment for which Subpart BB standards do apply. This equipment will be subject to the leak detection and record-keeping requirements of Subpart BB. The facility conducts leak inspections, repair and recordkeeping requirements of Subpart BB. Each valve, flange and pump which is associated with the hazardous waste tank and its ancillary equipment must be marked in association with Subpart BB regulations. A piping schematic shows the location and the number assigned to each piece of the equipment. Compliance with the standard will be achieved through facility inspections. If required, leak detection monitoring and repair records are maintained. Records of equipment monitoring and repair are maintained in the operating record. If a potential leak is discovered (by visual inspection, audible indication, or excessive odor) it will be noted on the inspection form. Any leak detected will be repaired as soon as practicable, but at least within 15 days. The leaking piece of equipment must be tagged with the I.D. number, date of potential or actual leak, and the date of leak confirmation. The leak detection and repair record will be kept at the facility. See Appendix F for an example form.

Wastes managed at the Service Center have been determined to contain volatile organic compounds (VOCs) at concentrations greater than 500ppm by weight. Therefore, the storage tanks and containers used for the management of hazardous wastes at the service center are subject to Level 1 control requirements under Subpart CC. Visual inspections of containers and hazardous waste tanks will be completed as required by 40 CFR 264.1084. The initial inspection of the tanks was conducted when the tanks first became subject to the Subpart CC rule. No defects were found during

the visual inspection. The facility complies with Level 1 controls for containers by meeting DOT regulations for packaging hazardous materials and equipping containers with covers in accordance with the requirements of 40 CFR 264.1084.

### **3.3 FACILITY DESIGN [40 CFR 270.14(b)(8)]**

The Tulsa Service Center was designed to minimize the possibility of spills or fires, and to minimize the effects of any accident that may occur. Specifications for the storage facilities, secondary containment, and other equipment are in Appendix C and E and descriptions follow.

#### **3.3.1 Tank Storage**

All tanks are constructed in accordance with Underwriters Laboratories Standard 142. The tanks are constructed of carbon steel and painted a light color to reflect sunlight. The tank interiors are not coated. The tanks are located more than 20 feet from the property line, in accordance with National Fire Protection buffer zone requirements. All tanks are equipped with an aural (audible) and visual (strobe light) high level alarm system.

The secondary containment (tank farm) consists of a monolithically poured slab and dike wall. The slab is 6" and the wall is 8" thick steel reinforced concrete. The concrete has been sealed with a protective coating to render it impermeable. The tanks' secondary containment calculations are shown in Appendix E.

The containment area is designed and operated to remove accumulated liquids through the use of a manually operated pumping system. Accumulated precipitation in the secondary containment system will be removed in a timely basis after detection. A visual inspection of the storm water for a sheen and discoloration will be conducted. If no sheen or discoloration is noted, the accumulated precipitation will be discharged from the tank farm to the surface of the facility. If a sheen is noted, the precipitation will be pumped into an onsite storage tank or vacuum truck for offsite management. If a solvent spill occurs within the containment dike, the spilled material will be completely removed. If water is present should a spill occur, all of the liquid will be managed as hazardous waste.

The return and fill adjacent to the tank farm is located to the west of the tank farm. The drum washer/dumpsters are hard-piped to the tank and all piping is aboveground. Secondary containment is provided by reinforced concrete slab and curbs.

### **3.3.2 Container Storage [40 CFR 264.173]**

The slab, curbing, and collection trenches for the CSAs in the warehouses are made of steel-reinforced concrete. The concrete floors are sealed with a coating that is compatible with the waste being stored, to render it impervious so as to contain leaks and spills until the collected material is detected and removed. In the west warehouse, the container storage area floor is covered by sheets of ¼" steel due to a moisture problem. Steel grates cover the trenches to facilitate the movement of containers across them.

Adequate aisle space will be maintained between rows of waste. This will allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of the facility during an emergency. The containers will be kept closed during storage except when wastes are being added to or removed from them. The containers must be handled and stored such that ruptures and leaks do not occur.

The metal shelter and its secondary containment are constructed of sheet steel and it is painted a light color to reflect sunlight. Overhead doors secure the shelter. Secondary containment in the form of a metal pan at the base of the building is used to contain potential leaks or spills. This container storage area is enclosed, thus preventing run-on from occurring. Spilled or leaked wastes will be removed by using absorbents. The resulting cleanup materials will be drummed and properly disposed of along with other containerized wastes.

### **3.4 PLANT OPERATIONS - POTENTIAL SPILL AND FIRE SOURCES, AND CONTROL PROCEDURES [40 CFR 264.31]**

Employees must perform their duties in the safest, most efficient manner possible. The facility is equipped to facilitate these activities. Whenever possible, containers will be moved using a handcart, and pallets are typically moved using a forklift or pallet jack. Upon arrival at the Service Center, containers of waste are either added to the spent solvent storage tanks or are placed in a container storage area. Open containers of solvent must not be left unattended. Containers holding hazardous waste will always be closed during storage except if necessary to add or remove wastes.

Below are descriptions of situations that can result in accidents and the precautions taken to prevent their occurrence.

### 3.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

- a. Emptying of drummed solvent into the drum washer/dumpster at the return and fill station – As the containers are emptied into the drum washer, solvent can splash out of the drum washer. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by coated concrete and will contain this type of spill. There is a blind sump in this floor for any splashed/spilled solvent to accumulate in. Any accumulated solvent will be pumped from this sump and into the drum washer for transfer to the waste storage tanks.
- b. Filling of drums with solvent product – A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill containers with clean solvent. Leaking fittings, a damaged hose, or carelessness could lead to the discharge of solvent outside of the container. Manual emergency shut-off valves are installed on each hose, should the equipment not function properly. Employee training emphasizes the importance of inspection, maintenance, and reporting of conditions with pollution incident potential.
- c. Moving of containers – When a container is moved, a potential exists for it to tip over. To minimize the potential for spillage of waste, all containers must be maintained in an upright position and remain tightly closed while in storage or in transit.
- d. Delivery truck transfers – The cargo should be secured in the route vehicle with straps or load locks before transport. Individual containers of waste can tip over or be dropped when being moved on or off a delivery truck. Appropriate material handling equipment will be used as necessary. If a spill does occur, the amount of material in the containers is a quantity that can be collected with absorbents. Any contaminated soil that results will be removed and transported to an approved facility for proper disposal.

### 3.4.2 Potential Major Spill Sources

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

- a. Overfilling of storage tanks – Storage tanks can be overfilled with a resulting discharge of materials. The high-level alarm is tested weekly for proper functioning of electrical and mechanical components. Further, the tank volume is checked daily before pumping materials into the tank. This will prevent overfilling of the storage tanks.
- b. Leaking pipelines – The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

### 3.4.3 Potential Fire Sources [40 CFR 264.176]

The following is a list of fire prevention and minimization measures:

- a. All waste and products are kept away from ignitable sources – Personnel must confine smoking and open flames to remote areas, separate from any flammable materials. The solvent handling area and the aboveground storage tanks are separated from the warehouse area to minimize the potential for a fire to spread or injury to personnel. All electrical wiring, switches, and fixtures meet applicable fire safety and electrical construction codes.
- b. 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 spent parts cleaner solvent is stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or sources that are subject to violent reactions. The tanks are vented and the containers are kept at ambient temperature to minimize the potential for pressure buildup.
  2. Produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health – The vapor pressure of parts cleaner solvent is low, 0.2 mm Hg at 68°F, and it is reactive with reactive metals and strong oxidizers only. Toxic

mists, fumes, dusts, or gases will not form in quantities to threaten human health since strong oxidizers are rarely handled at this facility and if so, they are only stored for 10 days or less. Solvent vaporization will be minimal under normal working conditions.

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion – See “a” above and “c” below.
  4. Damage the structural integrity of the Safety-Kleen facility – The parts cleaner solvent will not cause deterioration of the tank, drums or other structural components of the facility.
- c. Adequate aisle space 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.
  - d. “No Smoking” signs are posted in areas where ignitable materials are handled or stored.
  - e. Fire extinguishers must be checked once per month by facility personnel to ensure proper charges, and once per year by a fire extinguisher company.

#### **3.4.4 Tank Evaluation and Repair Plan**

The waste material stored in the tank at this facility is parts cleaner solvent, which is compatible with the carbon steel structure. In fact, the parts cleaner solvent is often used as a light hydrocarbon coating to prevent rusting of metal parts. The tanks will be checked for corrosion, leaks, or any damage that might affect the integrity of the storage tanks. If significant corrosion is noted, the tank will be removed or repaired. If the corrosion is significant and localized, the tank will be taken out of service immediately and repaired (e.g., a patch welded over the corroded area).

#### **3.4.5 External Factors [40 CFR 270.14(b)(8)]**

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 the west warehouse of the Service Center. The container storage areas are in the warehouses and the metal shelter area which are inaccessible to unauthorized personnel.

Vandalism – Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the Contingency Plan.

Strikes – An employee strike would not result in a solvent spill or fire. Operations will cease if a strike occurs.

Power failure – A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.

Flooding – The site elevation is above the projected 100-year floor plain, therefore a 100-year flood will not affect the facility.

Storms or Cold Weather – Storms and cold weather will have no foreseen effect on the facility.

### **3.5 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS [40 CFR 264.34]**

Internal communication within the facility is accomplished by voice. Telephones will be used to report a spill or fire, and to summon assistance from local and state emergency response agencies. Emergency response telephone numbers are posted by each facility telephone. Included in these phone numbers is the 24-Hour Safety-Kleen emergency response coordinator.

## CONTINGENCY PLAN

### ABSTRACT

**PURPOSE:** This plan describes the proper action to be taken by employees during an emergency.

**RESPONSIBILITIES:** The emergency coordinator or alternate is responsible for implementing the plan during an emergency.

**EMERGENCY COORDINATOR:** The emergency coordinator and alternate emergency coordinator are designated Safety-Kleen employees who have been trained for these positions.

#### EMERGENCY NOTIFICATIONS:

Catoosa Police Department	911 or non-emergency 918-266-2424
Catoosa Fire Department	911 or non-emergency 918-266-4611
Saint Francis Hospital	918-494-2200
Safety-Kleen 24-Hr Emergency Response	800-468-1760
Oklahoma Department of Environmental Quality	800-522-0206
National Response Center	800-424-8802

**4.0 CONTINGENCY PLAN [40 CFR 264 SUBPART D]**  
**Safety-Kleen Systems**  
**16319 East Marshall Street**  
**Tulsa, OK 74116**

**4.1 PURPOSE [40 CFR 264.51]**

The Contingency Plan describes the actions to be taken by employees in the event of a spill, fire, or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous waste to the air, soil, surface water, or ground water.

The Contingency Plan is to be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment.

**4.2 EMERGENCY COORDINATOR RESPONSIBILITIES [40 CFR 264.55]**

The emergency coordinator, or alternate emergency coordinator, is responsible for implementing the Contingency Plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or the alternate emergency coordinator be unavailable.

The emergency coordinator and the alternate emergency coordinator must be familiar with all aspects of this Contingency Plan, the 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 necessary to carry out the Contingency Plan. The emergency coordinator and alternate emergency coordinator's home addresses and telephone numbers, as well as the office telephone number are listed in Appendix F. At least one employee will be at the facility, or on call, to respond to an emergency situation at all times. Employee functions during an emergency and the Contingency Plan Quick Reference Guide are also located in Appendix F. .

**4.2.1 Responsibilities During an Emergency**

Whenever there is an imminent or actual emergency, the emergency coordinator (or the alternate when the emergency coordinator is not available) will:

- a. Activate the internal facility communication system to notify all facility personnel;
- b. Immediately notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number (currently 800-468-1760), which is the Safety-Kleen Incident Notification System;
- c. Notify appropriate state or local agencies with designated response roles if necessary; and,

Whenever there is a release, fire, or explosion, the emergency coordinator or alternate must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or, by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator or alternate must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion, (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run off).

During an emergency, the emergency coordinator or alternate must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous material at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

#### **4.2.2 Remedial Action Responsibilities**

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator or alternate emergency coordinator must contact the state agency and Safety-Kleen Emergency Response Coordinators to report the incident. The treatment, storage, and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

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

- a. No substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and

- b. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed.

#### **4.2.3 Reporting Responsibilities [40 CFR 264.56]**

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

- a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate local authorities (i.e., fire and police).
- b. The coordinator must immediately notify the Safety-Kleen Emergency Response Coordinators, Oklahoma Department of Environmental Quality and the National Response Center if necessary. This notification shall include the following:
  - (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, if known
  - (5) Extent of injuries, if any; and,
  - (6) Possible hazards to human health, or the environment outside the facility

Safety-Kleen will notify the appropriate state and local authorities that the facility is back in compliance with Section 4.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date and details of an incident that requires the implementation of the contingency plan. Within 15 days of the incident, Safety-Kleen will submit a written report to Oklahoma DEQ. The report must include:

- a. Name, address and telephone number of the owner or operator;
- b. Name, address and telephone number of the facility;
- c. Date, time and type of incident (e.g. fire, explosion, spill)
- d. Name and quantity of material(s) involved;
- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment;
- g. Estimated quantity and disposition of recovered material that results from the incident

#### 4.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

- a. The person who discovers/causes the spill reports to the emergency coordinator or alternate emergency coordinator;
- b. The emergency coordinator or alternate emergency coordinator contacts the Safety-Kleen Emergency Response Coordinators and .
- c. Safety-Kleen's Emergency Response Coordinators, will contact an emergency response contractor, if required.

#### 4.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

<u>Agency or Authority</u>	<u>Rationale</u>
Police Department	Notify if there is imminent danger to human health or need for evacuation
Fire Department	Notify if there is a fire, uncontrolled spill or other imminent danger
Hospital	Notify if there are any injuries
Oklahoma DEQ	Report releases and fires
National Response Center	Report releases
SK-Emergency Response Contractor	Call to assist with remedial action after a release

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 and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have been made to familiarize the local hospital with the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. Example letters that are sent to the local emergency responders are found in Appendix F.

### **4.3 EMERGENCY RESPONSE PROCEDURES [40 CFR 264.56]**

Response actions to be taken in specific emergency situations are described in the sections which follow.

#### **4.3.1 Minor Spills**

If a spill should occur while pouring spent solvent into a drum washer/dumpster or filling containers with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station. Remedial action will not be necessary. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

- a. If the solvent spills on a paved area, it must be collected with absorbent material. The sorbents will be collected, drummed, and transported to a licensed hazardous waste management facility for proper processing. Should water be present when a spill occurs, all of the liquid will be treated as hazardous waste, unless otherwise determined, and pumped into the spent solvent storage tank. The secondary containment of the container storage area is emptied using a wet/dry vacuum, pump, or absorbent materials. Detergent can be used as needed. All material collected from spill cleanups will be treated as hazardous waste.
- b. If the solvent spills on an unpaved area, the free solvent must be collected with absorbent material. The absorbent material and any contaminated soil will be collected, containerized and transported to a licensed hazardous management facility for proper processing.

If a spill occurs while moving or delivering containers outside of the warehouse, the response actions described above must be followed. Spills inside the warehouse or metal shelter will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors should be opened to improve the ventilation in the confined area (if safe to do so). If ignitable materials are spilled in a non-explosion proof rated area or is flowing into such, ensure that sources of ignition (e.g., thermostats or light switches) are left in the same position as at the time of the spill to prevent accidental sparking. Following instructions of the appropriate Safety Data Sheet, the worker will enter the area wearing the required personal protective equipment (e.g., gloves, aprons, safety glasses, and respirator), collect the liquid, containerize it and move it to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water.

#### **4.3.2. Major Spills**

Any spill that can not be completely remediated using the methods described in Section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material that escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems, and storm sewer systems. Emergency response to this type of spill should be as follows:

- a. Assist any injured people;
- b. Stop the flow of materials, if possible;
- c. Retain, contain, or slow the flow of the material if it cannot be stopped;
- d. If material escapes containment efforts, immediately call the local fire department, and report to the emergency coordinator or alternate emergency coordinator and Safety-Kleen's Emergency Response Coordinators.
- e. Immediately recover, to the extent possible, the spilled materials to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator or alternate emergency coordinator shall report any Incident, as soon as possible, to Safety-Kleen's Emergency Response Coordinators using the 24-hour telephone number. As determined by Safety-Kleen's Emergency Response Coordinators an emergency cleanup response contractor will be called. If it is deemed necessary, calls will be made to the National Response Center and Oklahoma DEQ.

The person reporting a spill should be prepared to give his/her name, position, company name, address, and telephone number. The person reporting should also describe the material spilled and if possible, some estimate of the amount, and the contaminant status, and specify any equipment needed.

Spills must be controlled and remediated to the fullest extent possible by Safety-Kleen personnel, even when assistance is required to totally remediate the situation. Safety-Kleen personnel must not take health or safety risks; if there is doubt as to whether a particular action is unsafe, it must be avoided. The source of a release must be stopped by turning off the pumps, closing valves, righting tipped containers or taking other appropriate actions. If the flow cannot be

stopped, a berm should be formed by shoveling dirt or absorbent material around the free liquid to hold it in one place or at least direct it to an area where it will do the least amount of damage (e.g., secondary containment areas).

The free liquid can be collected from the ground or affected surface water using absorbents or UL listed pumps. The liquids must be containerized or added to the waste storage tanks – if solvent waste.

#### **4.3.3. Fire Control Procedures**

If a small fire occurs, Safety-Kleen personnel must act quickly to put out the fire before it spreads to other parts of the facility, if possible to do so without undue threat to personal safety. If it cannot be extinguished with one fire extinguisher immediately, evacuate the facility and call the fire department.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those that can immediately be extinguished using one fire extinguisher. Any fire that cannot be brought under control immediately, or which has the potential to become uncontrollable warrants implementation of the evacuation plan.

Vapors of parts cleaner solvent exposed to a spark or open flame may flash at temperatures over 105°F. A parts washer solvent fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Attention should then be directed immediately to extinguishing the flame.

Dry cleaning wastes are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (approximately 1200°F). The potential for the materials reaching a decomposition state is minimal, however, Safety-Kleen personnel and local authorities must be aware of the proper response should a fire affect the container storage area. Emergency response should be as follows:

- a. Isolate the hazard area and deny entry to unauthorized personnel;
- b. Stay upwind, keep out of low areas;
- c. Ventilate closed spaces before entering them;
- d. Wear positive pressure breathing apparatus and protective clothing;
- e. Evacuate a 600-foot radius endangered by the gas.

A fire in the container storage areas can best be extinguished by foam, water fog, or water spray. Parts cleaner solvent and immersion cleaner can generate carbon monoxide and other poisonous gases when exposed to heat. Therefore, it is important to wear positive pressure breathing apparatus and full protective clothing in the affected area. If a fire in or near the areas where these wastes are stored occurs:

- a. Isolate the area and deny entry to unauthorized personnel;
- b. Stay upwind, keep out of low areas;
- c. Wear protective clothing and self-contained breathing apparatus.

A dry chemical, carbon dioxide or foam will best extinguish the fire. Cool the containers with water until well after the fire has been extinguished.

Explosions, structural damage or other hazardous conditions may result from the spread of the fire, therefore, the site must not be re-entered until the fire department has determined that it is safe to do so.

#### **4.4 EVACUATION PLAN**

Clearly marked exits are in the warehouses and office areas. Employees are trained to recognize all potential exit routes. The site evacuation plan is shown in Appendix F. When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assembled across Marshall Street to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation, either from a safe building or from a neighboring facility

#### **4.5 ARRANGEMENTS WITH EMERGENCY RESPONSE CONTRACTORS [40 CFR 264.37]**

A list of current, potential emergency response contractors is maintained by Safety-Kleen's Emergency Response Coordinators. These contractors will be contacted to provide emergency assistance during a release and/or cleanup.

Copies of the current Contingency Plan are made available to the applicable emergency response agencies. Safety-Kleen requests that each organization keep the Contingency Plan on file and notify Safety-Kleen if they refuse to enter in an agreement or cannot comply with the procedures

outlined within the plan. The agencies are invited to visit the facility to become more familiar with the site and the general location of hazardous material storage.

#### **4.6 IMPLEMENTATION SCHEDULE [40 CFR 264.51]**

Any discrepancies or deficiencies found during a routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The Branch General Manager has the overall responsibility for correcting any discrepancies found during the routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

#### **4.7 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN [40 CFR 264.53,54]**

This plan, and all revisions to the plan, are kept at the facility and are regularly updated throughout the operating life of the facility. This plan and all revisions to the plan are made readily available to employees working at the facility. The plan will be reviewed and updated, if necessary, whenever:

- a. The facility operations are revised to allow new wastes to be stored or treated, or applicable regulations are revised;
- b. The list or location of emergency equipment changes;
- c. The facility changes in its design, construction, operation and maintenance, or other circumstances in a way that:
  - (1) Increases the potential for fires, explosions, or releases of hazardous constituents, or
  - (2) Change the response necessary in an emergency;
- d. The names, addresses, or phone numbers of emergency coordinators change;
- e. The employee assigned to each emergency task changes; or
- f. The plan fails when implemented in an emergency.

## **5.0 PERSONNEL TRAINING**

### **5.1 OUTLINE OF TRAINING PROGRAM [40 CFR 264.16(d)]**

Each employee has received adequate training to operate and maintain the facility safely, and to understand hazards unique to his or her job assignments. Appendix G contains information on Service Center training outlines, and an example of the training record form.

### **5.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS**

Environmental compliance and training of branch employees is the responsibility of the Branch General Manager. The corporate regulatory compliance and training departments, in turn, provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for facility personnel. Appendix G contains example job descriptions, example training matrices, and an example training record form. These forms are subject to change and are included as examples only. Many training courses are completed electronically and records will also be maintained electronically.

#### **5.2.1 Branch General Manager**

The Branch General Manager is responsible for the business and environmental operations at the Service Center. The branch sales and service representatives, administrators, and warehouse employees report to the Branch General Manager. The Branch General Manager or his/her designee provides the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the Branch General Manager must:

- a. Keep the facility clean and orderly;
- b. Execute, or designate an employee to execute, the daily inspection, keep a written log, and remediate any problems;
- c. Know the potential hazards of the material and wastes handled at the site;
- d. Identify potential spill and fire sources and be able to execute the Contingency Plan;
- e. Inform all employees of their environmental responsibilities;
- f. Notify the proper authorities during an emergency, remediate the situation to the best of their abilities, and submit necessary reports with the company;

**PERSONNEL TRAINING****ABSTRACT**

**OBJECTIVE:** The purpose of training is to familiarize employees with environmental regulations, records, and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

**TIME OF TRAINING**

<b>Job Title</b>	<b>Prior to Starting Work</b>	<b>On The Job</b>	<b>Annually</b>	<b>When Regulations or Procedures Change</b>
Branch General Manager	X	X	X	X
Branch Administrator		X	X	X
Sales/Service Representatives	X	X	X	X
Warehouse Employees	X	X	X	X

## **5.0 PERSONNEL TRAINING**

### **5.1 OUTLINE OF TRAINING PROGRAM [40 CFR 264.16(d)]**

Each employee has received adequate training to operate and maintain the facility safely, and to understand hazards unique to his or her job assignments. Appendix G contains information on Service Center training outlines, and an example of the training record form.

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Environmental compliance and training of branch employees is the responsibility of the Branch General Manager. The corporate regulatory compliance and training departments, in turn, provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for facility personnel. Appendix G contains example job descriptions, example training matrices, and an example training record form. These forms are subject to change and are included as examples only. Many training courses are completed electronically and records will also be maintained electronically.

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- c. Know the potential hazards of the material and wastes handled at the site;
- d. Identify potential spill and fire sources and be able to execute the Contingency Plan;
- e. Inform all employees of their environmental responsibilities;
- f. Notify the proper authorities during an emergency, remediate the situation to the best of their abilities, and submit necessary reports with the company;

- g. Maintain all environmental records (such as manifests, training records, and spill reports) on file at the facility.

### **5.3 DESCRIPTION OF THE TRAINING PROGRAM [40 CFR 264.16(a)(1)]**

Employee training is accomplished using classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The Environmental Compliance and Corporate Training Departments prepare a training program for employees and the Service Center personnel provide documentation that the program has been executed.

An employee is trained prior to starting, or as soon as he or she begins working within 6 months of starting (depending on his or her position) and annually thereafter. The Environmental Compliance and Corporate Training Department ensures that the Branch General Manager or his/her designate has received adequate training to train all branch personnel. Appendix G contains an example outline of the training program, which demonstrates that facility personnel are trained in hazardous waste management procedures.

#### **5.3.1 Training of New Branch General Managers**

New Branch General Managers are trained before they begin their new positions. This training occurs on site, on-the-job, in off-site classroom training, electronic (i.e. video, e-Learning), written, and on-the-job methods. While being trained, a new Branch General Manager reviews all environmental records and learns the recordkeeping requirements. These records include manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates in additional training at the direction of an environmental professional. The training consists of an introduction to environmental law and a review of the Part B permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan. Additional time is spent reviewing past environmental compliance at the Branch General Manager's facility. Regulations unique to the state are discussed as well.

#### **5.3.2 Training of New Branch Administrators**

Branch administrators 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 General Manager or his/her designee and is

completed within six months of starting. The training includes some of the items listed in the Example Training Plan that may be applicable to the branch administrator's job. In addition, the Contingency Plan must be reviewed with the Branch General Manager.

#### **5.3.4 Training of New Sales and Service Representatives**

New representatives are introduced to the Part B Permit which includes: Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, etc. A representative may also be trained as a designate for performing the facility inspection. Additional training is in the form of classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The Contingency Plan must be reviewed before the representative formally begins the new position. Items such as those applicable in the Regulatory Training Matrix must be covered within six months of hire.

#### **5.3.5 Training of New Material Handlers**

A material handler is trained to maintain the Service Center and assist the other branch employees in their tasks. A material handler may also be trained as the designate for performing the daily inspection. Additional training may be in the form of videotape presentations, classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The Contingency Plan must be reviewed with the Branch General Manager before the material handler formally begins his/her new position, and annually thereafter. Items such as those listed in the Example Training Plan must be explained within six months of starting.

#### **5.3.6 Annual Training [40 CFR 264.16(c)]**

On an annual basis, employees are trained using a program prepared and updated by the Environmental Compliance and Corporate Training Department. It includes updates on environmental regulations, an in-depth review of the Contingency Plan, and a review of RCRA inspection criteria.

All Service Center employees will review annually, training items such as those listed in the Example Training Plan outline for branch employees. The annual training may vary from the topics listed in the Example Training Plan outline. This review may be in the form of videotapes and classroom instruction, electronic (i.e. video, e-Learning), written, and on-the-job methods. It will include discussion of the storage facility permit application. The Environmental Compliance and Corporate Training Department issues periodic memoranda on changes in environmental regulations, which all Service Center personnel must read and discuss.

**5.4 TRAINING RECORDS [40 CFR 264.16(d)]**

All employee regulatory training must be documented. Records of current employees will be kept at the facility until closure. Training documentation will include, at a minimum, the required information listed on the example record forms listed in Appendix G. Some training documentation will be maintained electronically.

## CLOSURE PLAN

### ABSTRACT

LOCATION ADDRESS: Safety-Kleen Systems, Inc.  
16319 East Marshall Street  
Tulsa, OK 74116

U.S. EPA I.D. No: OKD 000 763 821

#### WASTE UNITS TO UNDERGO CLOSURE:

- a. Tank Storage: Two 8,000-gallon aboveground storage tanks for spent parts washer solution and spent aqueous solution.
- b. Container Storage: One 1,190 square foot area for container storage in the west warehouse with a storage capacity of 4,464 gallons and one 1,275 square foot area of container storage in the east warehouse with a storage capacity of 6,912 gallons.
- c. Return and Fill Station: The location of this unit is shown on the Site Plan and consists of two drum washers with a combined capacity of 324 gallons.
- d. Metal Shelter: The location of this structure is shown on the Site Plan. It has a storage capacity of 2,184 gallons.

## **6.0 CLOSURE PLAN [40 CFR 270.14(b)(13) and 40 CFR 264 SUBPART G]**

### **6.1 PURPOSE**

The Tulsa Service Center operates as a storage facility for hazardous wastes and must be closed in accordance with the closure requirements of 40 CFR 264, Subpart G. Closure of the facility will be carried out in accordance with the steps in this plan. Appendix H contains an estimated schedule and cost. The closure cost will be updated at the beginning of each calendar year. Safety-Kleen will remediate all hazardous wastes from the facility to a level that is determined to be protective of human health and the environment. Hazardous wastes will be stored in appropriate containers and not in waste piles or landfills, therefore, no post closure maintenance is planned. Upon completion of closure activities, the need for post-closure maintenance will be minimized or eliminated.

### **6.2 ABOVEGROUND TANKS AND ASSOCIATED PIPING [40 CFR 264.197(a)]**

To safely clean and decommission the aboveground storage tanks:

- a. Remove the remaining material from the tank and return the materials to the Recycle Center for reclamation.
- b. Provide access to the tank
- c. Rinse, scrape and squeegee the tank interior, removing all residual waste material and rinsate
- d. Disconnect and decontaminate all appurtenant piping and pumping equipment
- e. Remove tank and appurtenant equipment and reuse or sell as scrap
- f. Clean the concrete diking and slab. Alternately, Safety-Kleen may want to leave the tanks and concrete diking and slab in place following closure as a RCRA permitted facility
- g. If necessary, backfill all excavations with clean fill materials
- h. Transport and dispose of all waste material generated during the project

### 6.2.1 Removal of Waste Material and Opening of the Tank

To safely open the tank and remove the waste material:

- a. Pump the waste materials out of the tank using a pump, vacuum truck, or similar equipment and transport to a Safety-Kleen Recycle Center or other properly permitted facility for reclamation.
- b. To gain access to aboveground tanks, use the man way at the top of the tank, or on the side of the tank. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the man way. Special care will be exercised to minimize spark generation when working on the tank.
- c. Prior to entering the tank, personnel will have appropriate respiratory equipment and protective clothing. Once the tanks have been opened, they must be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

### 6.2.1 Removal of Residual Waste and Cleaning of Tank

To safely remove the residual waste and clean the tank:

- a. Before removing any residual waste from the tank, all piping and appurtenant equipment associated with the parts washer solvent tank will be flushed with a detergent solution.
- b. The method used to remove residual waste from the tank will depend on the physical properties and quantities of the material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible.
- c. Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high-pressure wash system using a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be returned to a Recycle Center for reclamation. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.
- d. Storage tanks are considered confined spaces per OSHA. Confined space entry requires special procedures. These procedures will be specified in the site health and safety plan prepared by the independent engineer.

### 6.2.3 Removal of the Tank

To safely remove the tank:

- a. Disconnect and decontaminate all appurtenant piping and pumping equipment.
- b. The vessel shall be removed and reused or cut up and sold as scrap. The tanks and piping unfit for reuse shall be removed and disposed of at a properly permitted landfill or recycled as scrap. Verification of destruction will be provided. The rinsate will be collected and sent to a Safety-Kleen Recycle Center or properly permitted treatment or disposal facility for treatment.
- c. The concrete diking will be cleaned with a high-pressure water detergent solution. A sample of the final rinse water will be collected and analyzed for volatile organic compounds to confirm the cleanliness of the diking. Soil samples beneath the concrete will be collected only if significant, fully-penetrating, unsealed cracks are evident in the concrete slab. All soil samples will be analyzed for mineral spirits, volatile organic compounds, and characteristic for toxicity due to cadmium, chromium, and lead using TCLP protocol. If contamination is indicated, a soil study will be done to determine the extent. Over excavation of the soil or other approved method will be performed to eliminate the contamination. Soil samples will be collected and analyzed after cleanup to ensure decontamination has been achieved.
- d. Inspect the excavation and backfill with clean fill materials and grade to ground level.

### 6.3 CONTAINER STORAGE AREAS IN WAREHOUSES (CSAs) [40 CFR 264.178]

The CSAs are used for the storage of containers that may contain spent parts washer solvent, aqueous parts cleaner waste, spent immersion cleaner, dry cleaning waste, dumpster sediment, paint waste, used antifreeze, photographic imaging waste, spent industrial fluids, used oil and various transfer wastes. At closure, the containers will be removed and transported to an appropriate licensed hazardous waste management facility after proper packaging, labeling, and manifesting.

The concrete floor and spill containment sump will be cleaned with a detergent solution. The final rinsate will be analyzed for volatile organic compounds. All rinsate wastes generated in the container storage area will be transported to a licensed hazardous waste management facility.

#### **6.4 CONTAINER STORAGE AREA IN METAL SHELTER [40 CFR 264.178]**

The metal shelter is used for the storage of containers that may contain spent parts washer solvent, aqueous parts cleaner waste, spent immersion cleaner, dry cleaning waste, dumpster sediment, paint waste, used antifreeze, photographic imaging waste, spent industrial fluids, used oil and various transfer wastes. At closure, the containers will be removed and transported to an appropriate licensed hazardous waste management facility after proper packaging, labeling, and manifesting.

The shelter will be thoroughly cleaned with a detergent solution. The final rinsate will be analyzed for volatile organic compounds. Rinsing and washing will continue until these levels are found to be below detection limits. All rinsate wastes generated in the container storage area will be transported to a licensed hazardous waste management facility.

The shelter will be reused by the Company or recycled as scrap metal.

#### **6.6 SOLVENT RETURN AND FILL STATION**

The return and fill station is used to collect and return the spent parts cleaner solvent and spent aqueous solutions to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, any sediment in the drum washers will be removed and containerized, labeled, and manifested for proper treatment and/or disposal through a Safety-Kleen recycle center.

The drum washers and the dock area will be thoroughly rinsed with a detergent solution. The rinsate will be discharged through the appurtenant piping system into the storage tanks, will be subjected to a separate closure procedure as described earlier. The final rinsate must be analyzed for volatile organic compounds. The clean drum washers and dock structure may be reused by Safety-Kleen or disposed at a properly permitted landfill or used as scrap metal.

#### **6.7 DECONTAMINATION OF CLEANUP EQUIPMENT [40 CFR 264.116]**

All equipment used for the closure of the facility will be properly decontaminated prior to its reuse. Small equipment (such as mops, rags, etc.) and their residue that cannot be reused will be transported to a licensed hazardous waste management facility.

**6.8 FACILITY CLOSURE SCHEDULE AND CERTIFICATION [40 CFR 264.113 & 115]**

Within 90-days of receiving the final volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The Oklahoma Department of Environmental Quality 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 the following requirements are met:

- a. The facility has the capacity to receive additional wastes;
- b. There is a likelihood that an entity other than Safety-Kleen will recommence operation of the site; and/or
- c. Closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

When closure is completed, Safety-Kleen shall submit to the DEQ, certification, both by the operator and by an independent registered professional engineer that the facility has been closed in accordance with the approved Closure Plan.

## 7.0 MANAGEMENT OF WASTES IN CONTAINERS

### 7.1 DESCRIPTION OF WASTES TO BE STORED [40 CFR 264.173]

The container storage areas in the east and west warehouses and the container storage area in the metal shelter are used for the storage of used immersion cleaner, spent aqueous parts cleaning solutions, spent aqueous brake cleaning solution, spent parts washer solution, dry cleaning wastes, paint wastes, drum washer/dumpster sediment, tank bottom sediment, contaminated debris, and transfer wastes. These may carry one or more of the waste codes listed in the Facility Description – Abstract at the beginning of this application. incompatible wastes are kept segregated. In addition, proper hazardous waste labels are affixed to the containers. Hazardous waste labels must include the following wording: “*Hazardous Waste – Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.*” Labels must also include the generator’s name and address and manifest document number.

In addition, the labels must include the EPA waste codes, the accumulation start date and the generator’s EPA ID number (if applicable). The container storage areas store DOT-approved containers normally ranging in volume from 5 gallons up to an 85-gallon overpack and occasionally bulk storage containers (totes, cubic yard boxes etc.) up to 350 gallons.

### 7.2 SECONDARY CONTAINMENT STRUCTURES [40 CFR 264.175]

The container storage area in the east warehouse has secondary containment in the form of a coated concrete floor which slopes to two, coated concrete, grated, blind trenches located along the north and south sides of the storage area. The area is also surrounded by a six-inch wide by four-inch high curb.

The container storage area in the west warehouse has secondary containment in the form of a metal, diamond-plated floor, a six-inch wide by four-inch high steel reinforced concrete curb, and a blind trench located along the north entrance.

The metal shelter has secondary containment in the form of a metal pan at its base.

The total containment volume in each storage area is more than 10% of the total volume of the containers that will be stored in each area at a time.

The slabs and collection trenches for the container storage areas are made of steel reinforced concrete. Joints are sealed with chemical-resistant water stops. Steel grates cover the

trenches to facilitate the movement of drums across them. The entire base is free of cracks and gaps and has been sealed with chemical resistant coating to further decrease permeability. The wastes in storage are only incompatible with strong oxidizers and reactive metals, which are not present in the base or sealants.

The total volume of materials (including products and non-hazardous wastes) stored in the container storage areas will not exceed the volume shown in the Waste Analysis Plan (WAP) Abstract.

### **7.3 PREVENTION OF RUNON, RUNOFF AND ACCUMULATION OF SPILLS [40 CFR 264.175]**

The container storage areas are indoors so accumulation of precipitation, runoff and runoff is essentially eliminated. Spilled or leaked waste must be removed from the secondary containment systems with sufficient frequency to prevent overflow. Daily inspections for the trenches will result in the removal of any accumulated liquids. A hand-held pump (e.g., COMS pump or wet/dry vacuum), sorbent material or other appropriate methods will be used to remove liquids. Material will be properly disposed of.

### **7.4 STORAGE CONFIGURATION**

The containers of permitted waste will be stored in rows on pallets. Containers that are 55-gallons or larger will not be stacked more than three high and pallets will be used between layers of stacked containers. Containers in the storage areas are moved with a forklift, pallet jack, drum cart or other safe and effective means. Total volume of material (both product and waste) to be stored in the warehouses or metal shelter, at any given time, will not exceed the volume shown in the Waste Analysis Plan (WAP) Abstract.

Incompatible wastes will be segregated appropriately per DOT segregation requirements.

### **7.5 COMPATIBILITY OF CONTAINERS WITH THEIR CONTENTS AND EACH OTHER [40 CFR 264.172]**

All wastes will be stored in containers that meet DOT specifications for those materials.

### **7.6 HANDLING AND MANAGEMENT OF CONTAINERS**

Containers holding hazardous wastes will be closed during storage except when it is necessary to add or remove waste. In addition, containers holding hazardous waste will not be

opened, handled or stored in a manner which may rupture the container or cause it to leak. Containers will be closed during movement and, if necessary, opened only in contained areas. Any objects or actions that may cause puncture of containers must be avoided.

#### **7.7 INSPECTIONS [40 CFR 264.174]**

The container storage areas must be inspected on all operating days, which excludes weekends and holidays. If a container holding hazardous waste is not in good condition, or it begins to leak, its contents are either transferred to a new container, the leaking container is overpacked or it is managed in another way that complies with this section.

The containment structure must be inspected for cracks, corrosion, or any other sign of deterioration. Any sign of deterioration must be noted on the inspection sheet and the deterioration must be remediated.

#### **7.8 BUFFER ZONE REQUIREMENTS [40 CFR 264.176]**

In accordance with 40 CFR 264.176, containers holding ignitable wastes must not be stored within 50 feet of the property line. Each container storage area meets the 50-foot buffer zone requirement.

#### **7.9 COMPLIANCE WITH LAND DISPOSAL RESTRICTIONS [40 CFR 264.168]**

In accordance with 40 CFR 268.50, each waste container must be clearly marked to identify its contents and the date the period of accumulation began. No container may be stored for longer than one year (unless it is non-hazardous).

#### **7.10 SUBPART CC [40 CFR 264.1086]**

Containers managing hazardous wastes at this facility generally fall into the following categories:

- a. Those hazardous waste containers that are less than 26 gallons in capacity are exempt from regulation under Subpart CC. In addition, containers which are “transferred” through the facility are considered to be in the course of transportation, as opposed to storage, and therefore, are not subject to Subpart CC standards.

- b. Containers with capacities between 26 and 122 gallons are Level 1 containers, and generally meet the Level 1 standards of the container being covered and designed and operated with no gaps, holes, cracks, or other open spaces. In addition, containers used to manage wastes meet applicable U.S. DOT regulations for packaging and transport.
- c. Containers greater than 122 gallons that manage hazardous wastes at this facility are not in light liquid service and are therefore considered Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces. In addition, containers used to manage waste meet applicable U.S. DOT regulations for packaging and transport of hazardous materials.

Hazardous wastes accepted from off-site generators are already containerized when the facility accepts the waste. Such containers are visually inspected at time of pickup, at time of offload for storage or transfer at the facility and during the daily inspection.

## **8.0 MANAGEMENT OF WASTE IN TANKS [40 CFR 264 SUBPART J]**

### **8.1 DESCRIPTION OF TANK SYSTEM**

The waste storage tank system is aboveground and piping outside of secondary containment has welded joints.

The two 8,000-gallon aboveground, horizontal hazardous waste (HW) storage tanks are 21' long by 8' high. The tanks are constructed of 3/16" thick (1/4" at the bottom third of the tank) carbon steel painted white to reflect sunlight and minimize corrosion. The tanks have been designed in accordance with Underwriters Laboratories (UL) Standard 142 and they are located more than 20 feet from the property line, in accordance with Table 2-6 of the National Fire Protection buffer zone requirements. Spent parts washer solution is stored in both tanks. The entire facility, including the tank farm, is secured by a 6' high chain link fence topped by three strands of barbed wire.

A manually-controlled waste feed cut-off valve located adjacent to the drum washer/dumpster unit at the return and fill station can prevent the waste tanks from being overfilled. In addition, both of the aboveground tanks are equipped with high level alarms (aural and visual) to indicate when the tanks are approximately 95% full.

Each tank is equipped with a pressure/vacuum vent which operates at two ounces of pressure and one ounce of vacuum. The tanks operate at atmospheric pressure and venting is to the atmosphere. Also, the man way on each tank allows for emergency venting of the tank in the event of an emergency as prescribed by the National Fire Protection Association. The specific gravity of the spent parts washer solution is approximately 0.8 and the vapor pressure at 68°F is 0.4mm Hg.

The tanks at the facility do not have bypass systems.

### **8.2 DESCRIPTION OF SECONDARY CONTAINMENT SYSTEM [40 CFR 264.193]**

The secondary containment for the tanks consists of a monolithically poured concrete slab and dike wall. Joints are protected with chemical-resistant water stops. The slab is 6" thick and the wall is 6" thick steel-reinforced concrete. The diked area is shown on a drawing in Appendix E and has a containment volume in excess of 8,000 gallons plus the precipitation from a 25-year, 24-hour rain event. Accumulated rainwater will be removed from the secondary containment within 24 hours after the ceasing of a rain event. It will be inspected for any appearance of sheen. If no sheen is present, the precipitation will be pumped to ground. If sheen is present, the precipitation will be pumped into the waste storage tank for proper disposal. Currently there are three tanks holding

8,000 gallons each present in the diked area, with room to add a fourth tank if needed. Two tanks are for spent parts washer solution and spent aqueous solutions and the other one is for clean parts washer solvent. Each tank is equipped with a high-level alarm. Reference is made to the tank farm plan in Appendix E for secondary containment calculations.

### **8.3 TANK MANAGEMENT PRACTICES [40 CFR 264.195]**

The tanks and secondary containment are inspected each operating day excluding holidays and any other occasion when no operations are occurring (e.g. weekends, inclement weather, all-day training, power outage etc.). Specific parameters of the inspection are covered in Section 3.2. Volume gauges must be checked to ensure the tanks are not being overfilled. Leaks or signs of deterioration must be noted and remediated immediately. The procedures to remove spilled or leaked material from the secondary containment are described in 4.3.1 and 4.3.2. Spilled or leaked material will be removed immediately upon detection.

### **8.4 SUBPART CC [40 CFR 264.1084]**

There are two waste storage tanks at the facility. Tank features as they related to Subpart CC are as follows: tanks are non-pressurized, fixed-roof type with a capacity of less than 20,000 gallons. The waste stored in the tanks exhibits a vapor pressure of less than 5.2 kPa (11.1 psi). The actual vapor pressure of the waste managed is approximately 0.008 psi.

The tanks are designed and operated so that cover openings can be closed with no visible gaps, holes, cracks or other open spaces into the interior of the tanks. The cover and cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position except when the waste is being added or removed from the tanks, or when necessary sampling or repair/maintenance is performed. The tanks are vented to the atmosphere through a safety device which has been designed to operate with no detectable emissions when the device is in the closed position.

Visual inspections of the tanks and control devices are conducted on an annual basis.

## 9.0 SPECIAL CONDITIONS – CUP (CONTINUED USE PROGRAM)


### 9.1 DESCRIPTION

Under the CUP, spent parts washer solutions (hereinafter CUP solvents) collected from customers are eligible to be used for drum washing activities at the facility and are exempt from the definition of hazardous waste as provided in 40 CFR 261.2(e)(1)(ii), when the CUP solvents are managed according to the following:

1. No generators located outside the state of Oklahoma will be allowed to participate in the CUP program at the Tulsa, OK service center.
2. Safety-Kleen shall maintain the following records at the facility from each generator for a minimum of three years in accordance with the requirements of 40 CFR 261.2(f):
  - a. Name, address and EPA ID number (if applicable)
  - b. Quantity of CUP solvent picked up
  - c. Continued Use Service Checklist
3. CUP solvents that meet any of the following criteria shall be managed as a hazardous waste:
  - a. CUP solvent not used to wash drums
  - b. CUP solvent that would be ineffective as a drum washing agent
  - c. CUP solvent that is cross-contaminated with any foreign materials that would render the CUP solvent ineffective as a drum washing agent
4. Safety-Kleen shall use only the CUP solvent vat located in the Return and Fill shelter area for handling/transference of CUP solvent. Non-CUP solvent will not be placed in the CUP vat.
5. In the event Safety-Kleen discovers that a CUP customer has returned or attempted to return to Safety-Kleen (a) solvents in violation of the criteria set forth in the Solvent Eligibility Form or (b) solvents containing non-solvent, toxic materials of a type or amount not consistent with the customer's normal parts washing activities, Safety-Kleen will warn the customer that they may be removed from the program if the problem persists.
6. Safety-Kleen will not speculatively accumulate CUP solvent. To ensure that speculative accumulation is not occurring, CUP solvent must be used within 96 hours of receipt (excluding weekends).

7. Safety-Kleen shall not use more CUP solvent than necessary for the drum washing operation. No more than 13 gallons of CUP solvent shall be used per drum wash cycle. It should be noted, however, that not every drum can be adequately cleaned with a single drum wash cycle. Therefore, occasionally, more than one wash cycle may be needed to clean a single drum.

APPENDIX A  
PART A APPLICATION

<p><b>United States Environmental Protection Agency</b>  <b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b></p>	
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**1. Reason for Submittal (Select only one.)**

<input type="checkbox"/>	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility, a reverse distributor, and/or generator of $\geq 1,000$ kg of non-acute hazardous waste, $> 1$ kg of acute hazardous waste, or $> 100$ kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input checked="" type="checkbox"/>	Submitting a new or revised Part A (permit) Form

**2. Site EPA ID Number**

O	K	D	0	0	0	7	6	3	8	2	1
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**3. Site Name**

<b>Safety-Kleen Systems, Inc.</b>
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**4. Site Location Address**

Street Address <b>16319 East Marshall Street</b>		
City, Town, or Village <b>Tulsa</b>	County <b>Rogers</b>	
State <b>Oklahoma</b>	Country <b>USA</b>	Zip Code <b>74116</b>
Latitude <b>36.172962</b>	Longitude <b>-95.795151</b>	<input type="checkbox"/> Use Lat/Long as Primary Address

**5. Site Mailing Address**

Same as Location Street Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

**6. Site Land Type**

<input checked="" type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
---	---------------------------------	-----------------------------------	----------------------------------	---------------------------------	------------------------------------	--------------------------------	--------------------------------

**7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)**

A. (Primary) <b>562112</b>	C. <b>484230</b>
B. <b>484220</b>	D. <b>532490</b>

**8. Site Contact Information**

Same as Location Address

First Name <b>Boz</b>	MI	Last Name <b>Cannon</b>
Title <b>Branch General Manager</b>		
Street Address <b>16319 East Marshall Street</b>		
City, Town, or Village <b>Tulsa</b>		
State <b>OK</b>	Country <b>USA</b>	Zip Code <b>74116</b>
Email <b>boz.cannon@safety-kleen.com</b>		
Phone <b>918-234-5185</b>	Ext <b>N/A</b>	Fax

**9. Legal Owner and Operator of the Site**

**A. Name of Site's Legal Owner**

Same as Location Address

Full Name <b>Safety-Kleen Systems, Inc.</b>	Date Became Owner (mm/dd/yyyy) <b>1/1/1978</b>
Owner Type <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address <b>42 Longwater Dr</b>	
City, Town, or Village <b>Norwell</b>	
State <b>Massachusetts</b>	Country <b>USA</b> Zip Code <b>02061-9149</b>
Email <b>N/A</b>	
Phone <b>781-792-5000</b>	Ext <b>N/A</b> Fax <b>N/A</b>
Comments	

**B. Name of Site's Legal Operator**

Same as Location Address

Full Name <b>Safety-Kleen Systems, Inc.</b>	Date Became Operator (mm/dd/yyyy) <b>1/1/1978</b>
Operator Type <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address <b>42 Longwater Drive</b>	
City, Town, or Village <b>Norwell</b>	
State <b>Massachusetts</b>	Country <b>USA</b> Zip Code <b>02061-9149</b>
Email <b>N/A</b>	
Phone <b>781-792-5000</b>	Ext <b>N/A</b> Fax <b>N/A</b>
Comments	

**10. Type of Regulated Waste Activity (at your site)**

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

**A. Hazardous Waste Activities**

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
<input checked="" type="checkbox"/>	a. LQG	-Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/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. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
<input type="checkbox"/>	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i>	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	4. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5 Recycler of Hazardous Waste	
<input type="checkbox"/>	a. Recycler who stores prior to recycling	
<input type="checkbox"/>	b. Recycler who does not store prior to recycling	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption	
<input type="checkbox"/>	b. Smelting, Melting, and Refining Furnace Exemption	

**B. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

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	F001	F002

F003                      F005

**C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes.** Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

N/A						

**11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)****A. Other Waste Activities**

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input checked="" type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

**B. Universal Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input type="checkbox"/>	a. Batteries
<input type="checkbox"/>	b. Pesticides
<input type="checkbox"/>	c. Mercury containing equipment
<input type="checkbox"/>	d. Lamps
<input type="checkbox"/>	e. Aerosol Cans
<input type="checkbox"/>	f. Other (specify) _____
<input type="checkbox"/>	g. Other (specify) _____
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities**

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input checked="" type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
<input type="checkbox"/>	b. Marketer Who First Claims the Used Oil Meets the Specifications

**D. Pharmaceutical Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
<input type="checkbox"/>	a. Healthcare Facility
<input type="checkbox"/>	b. Reverse Distributor
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

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

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories— If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories.

**13. Episodic Generation**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator.
--	---

**14. LQG Consolidation of VSQG Hazardous Waste**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQG hazardous waste.
--	---

**15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility	
B. Expected closure date: _____ mm/dd/yyyy	
C. Requesting new closure date: _____ mm/dd/yyyy	
D. Date closed : _____ mm/dd/yyyy	
<input type="checkbox"/>	1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)
<input type="checkbox"/>	2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

**16. Notification of Hazardous Secondary Material (HSM) Activity**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you 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), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
--	---

**17. Electronic Manifest Broker**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
--	--

**18. Comments (Include item number for each comment)**

**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. 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 fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative <i>Mori Sorenson</i>	Date (mm/dd/yyyy) <i>05/08/2024</i>
Printed Name (First, Middle Initial Last) <b>Mori Sorenson</b>	Title <b>VP Environmental Compliance</b>
Email <b>mori.sorenson@safety-kleen.com</b>	
Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	

United States Environmental Protection Agency <b>HAZARDOUS WASTE PERMIT PART A FORM</b>	
--	---

**1. Facility Permit Contact**

First Name	<b>Boz</b>	MI	Last Name	<b>Cannon</b>	
Title	<b>Branch General Manager</b>				
Email	<b>boz.cannon@safety-kleen.com</b>				
Phone	<b>918-234-5185</b>	Ext	<b>N/A</b>	Fax	<b>N/A</b>

**2. Facility Permit Contact Mailing Address**

Street Address	<b>16319 East Marshall Street</b>				
City, Town, or Village	<b>Tulsa</b>				
State	<b>OK</b>	Country	<b>USA</b>	Zip Code	<b>74116</b>

**3. Facility Existence Date (mm/dd/yyyy)**

<b>1/1/1978</b>
-----------------

**4. Other Environmental Permits**

A. Permit Type	B. Permit Number	C. Description

**5. Nature of Business**

<p><b>This facility includes a local sales/service office and distribution/accumulation warehouse and tanks for clean and spent solvents and other industrial wastes. Safety-Kleen collects spent solvents and other wastes, either in storage tanks or in containers. Once a sufficient quantity of material is collected, it is shipped to an off-site facility.</b></p>
--

**6. Process Codes and Design Capacities**

Line Number	A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name	
				(1) Amount	(2) Unit of Measure			
0	1	S	0	1	13,560	G	003	Container Storage Areas
0	2	S	0	2	16,000	G	002	HW Storage Tank

**7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))**

Line No.	A. EPA Hazardous Waste No.			B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes																
						(1) Process Codes					(2) Process Description (if code is not entered in 7.D1))											
0	1	D	0	0	1	2,500,000	G	S	0	1	S	0	2									
0	2	D	0	0	4																	Included with above
0	3	D	0	0	5																	Included with above
0	4	D	0	0	6																	Included with above
0	5	D	0	0	7																	Included with above
0	6	D	0	0	8																	Included with above
0	7	D	0	0	9																	Included with above
0	8	D	0	1	0																	Included with above
0	9	D	0	1	1																	Included with above
1	0	D	0	1	8																	Included with above
1	1	D	0	1	9																	Included with above

**8. Map**

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

**9. Facility Drawing**

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

**10. Photographs**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

**11. Comments**

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1)) CONTINUED

Line No.	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	Processes										
								(1) Process Codes					(2) Process Description (if code is not entered in 7.D1)					
1	2	D	0	2	1													Included with above
1	3	D	0	2	2													Included with above
1	4	D	0	2	3													Included with above
1	5	D	0	2	4													Included with above
1	6	D	0	2	5													Included with above
1	7	D	0	2	6													Included with above
1	8	D	0	2	7													Included with above
1	9	D	0	2	8													Included with above
2	0	D	0	2	9													Included with above
2	1	D	0	3	0													Included with above
2	2	D	0	3	2													Included with above
2	3	D	0	3	3													Included with above
2	4	D	0	3	4													Included with above
2	5	D	0	3	5													Included with above
2	6	D	0	3	6													Included with above
2	7	D	0	3	7													Included with above
2	8	D	0	3	8													Included with above
2	9	D	0	3	9													Included with above
3	0	D	0	4	0													Included with above
3	1	D	0	4	1													Included with above
3	2	D	0	4	2													Included with above
3	3	D	0	4	3													Included with above
3	4	F	0	0	1		T	S	0	0	1							Included with above
3	5	F	0	0	2		T	S	0	0	1							
3	6	F	0	0	3		T	S	0	0	1							
3	7	F	0	0	5		T	S	0	0	1							Included with above



**Figure 1: Main Office Building**



**Figure 2: West Warehouse**



**Figure 3: Inside West Warehouse**



**Figure 4: Inside East Warehouse**



**Figure 4: Metal Flammable Shelter**



**Figure 5: Return and Fill Station**

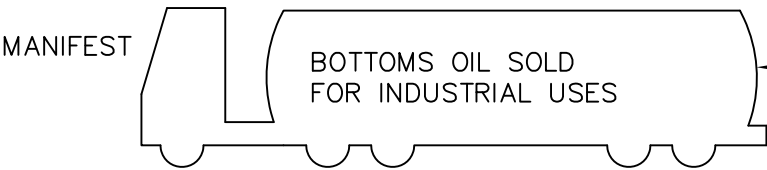
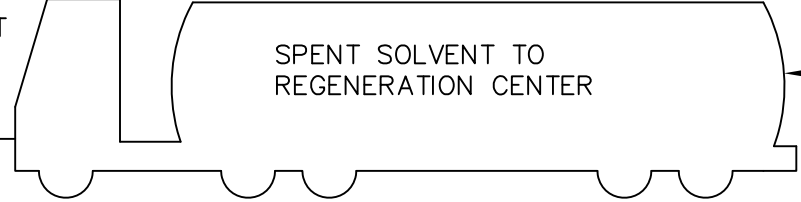
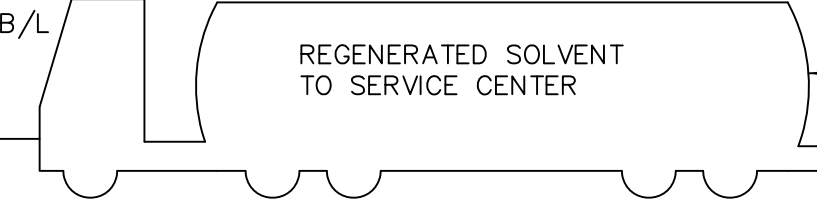
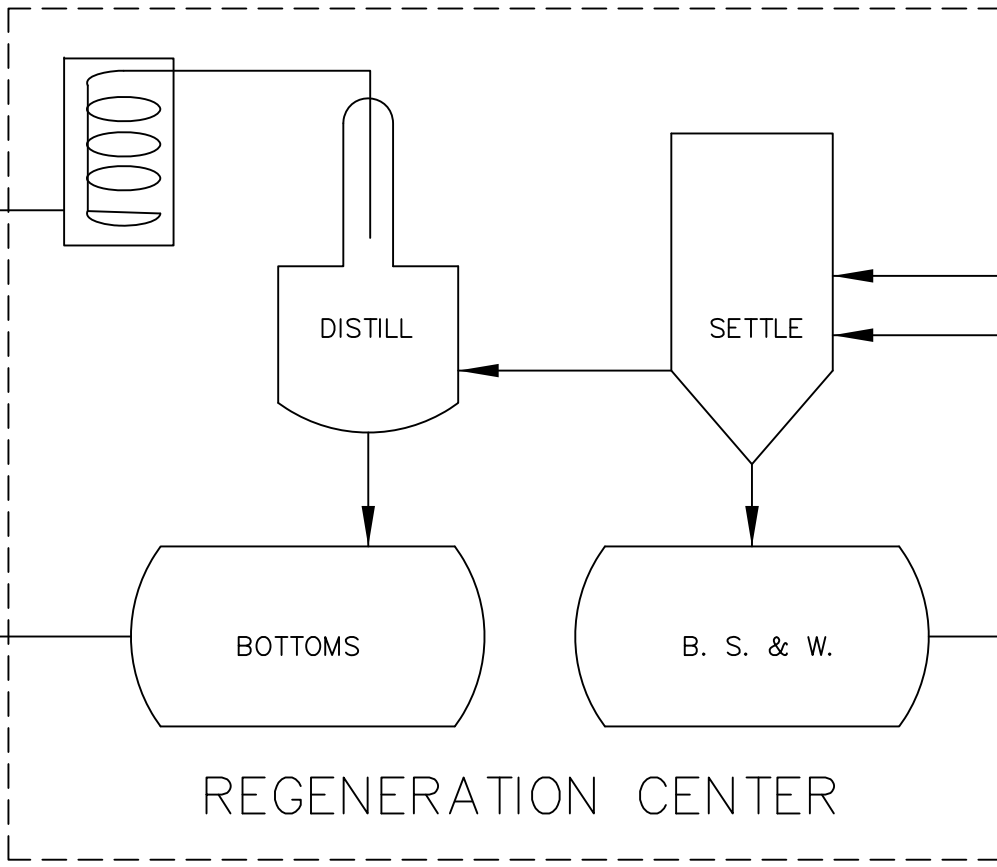
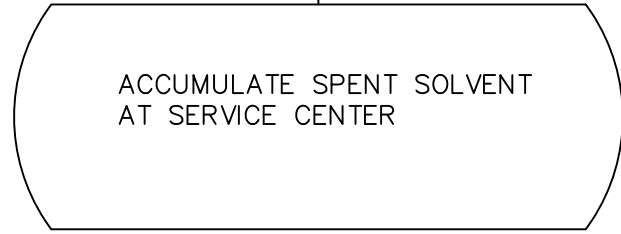
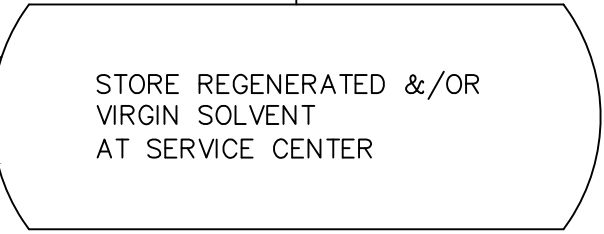
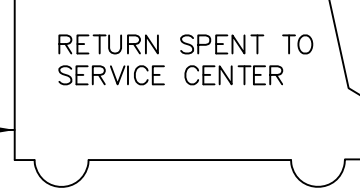
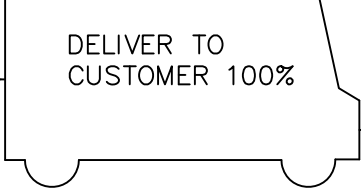
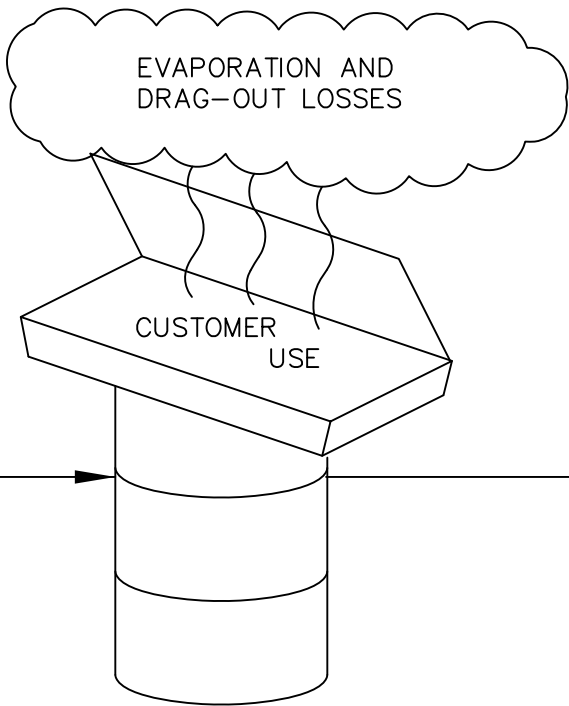


**Figure 6: Tank Farm with Secondary Containment**

APPENDIX B  
PROCESS FLOW DIAGRAMS

## Exhibit B-1

### Safety-Kleen Solvent Use and Regeneration Loop



MANIFEST

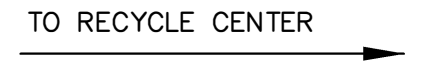
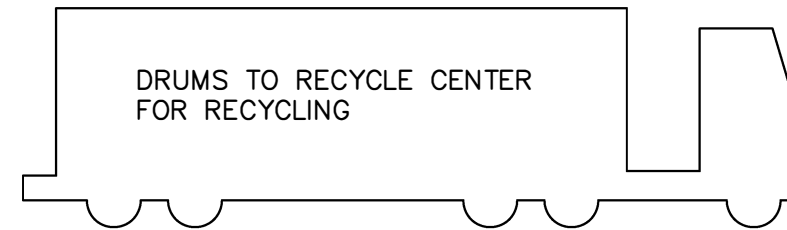
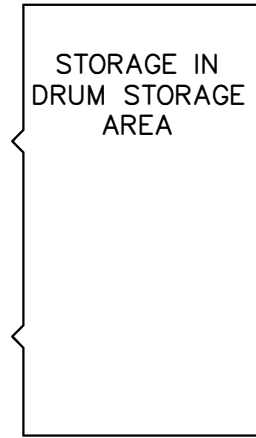
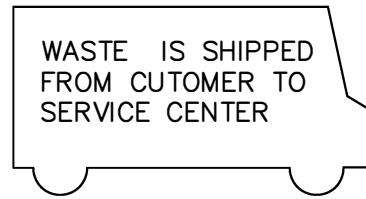
B/L=WITH BILL OF LADING

EXHIBIT B-1

TITLE					
SOLVENT USE AND REGENERATION LOOP					
<b>SAFETY-KLEEN SYSTEMS, INC.</b> <small>42 LINGWATER DR. NORWELL, MA 02061          PHONE 781-792-5500</small>					
SCALE	BY	CHKD	P.E. APPR	OP. APPR	DATE
NONE	PROJ.SOL				2-5-03
SERVICE CENTER LOCATION			SC-DWG-REV NO.		SHEET NO.
STANDARD			BSD 941		


## Exhibit B-2

### Process for the Handling of Spent Immersion Cleaner, Aqueous Parts Cleaner Waste and Dry-Cleaning Waste



SPENT IMMERSION CLEANER, DRY CLEANER WASTE, PAINT WASTE, SPENT PHOTO CHEMICAL WASTE, ANTI-FREEZE WASTE, AND AQUEOUS CLEANER WASTE

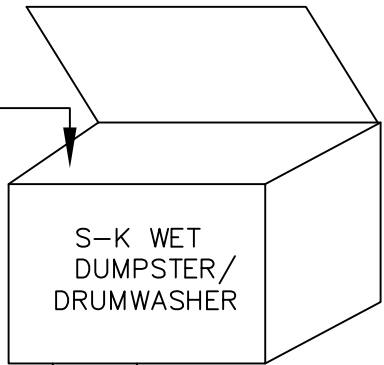
EXHIBIT B-2

TITLE					
UNIT PROCESS FOR HANDLING WASTE IN CONTAINERS					
 SAFETY-KLEEN SYSTEMS, INC. 42 LONGVIEW DR. NORWELL, MA 02061 PHONE 508-669-5748					
SCALE	BY	CHKD	P.E. APPR	OP. APPR	DATE
NONE	PROJSOL				2-5-03
SERVICE CENTER LOCATION			SC-DWG-REV NO.		SHEET NO.
STANDARD			BSD 943		

## Exhibit B-3

### Unit Process for The Handling of Spent Parts Cleaner Solvent

USED SOLVENT FROM CUSTOMER IN DRUMS



SLUDGE DUMPSTER MUD PLACED IN DRUMS

STORAGE IN DRUM STORAGE AREA

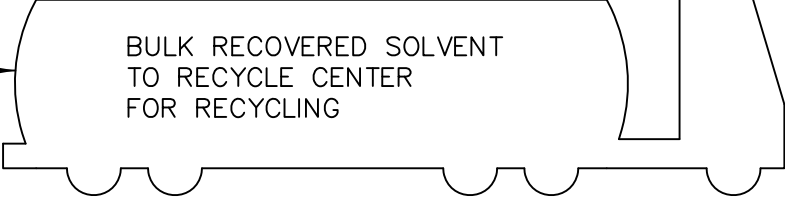
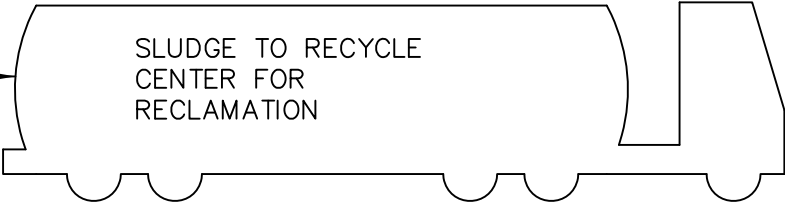
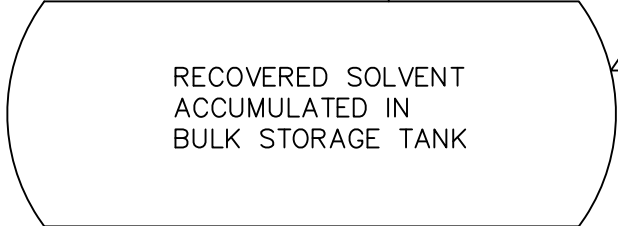
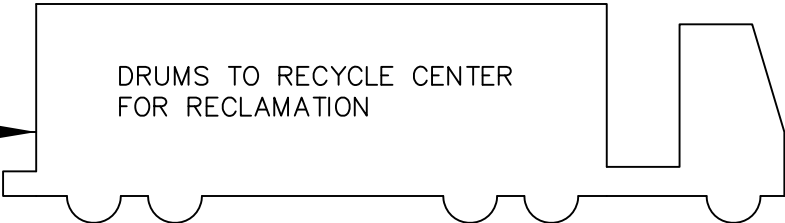



EXHIBIT B-3

TITLE					
HANDLING PROCESS FOR SPENT MINERAL SPIRITS					
 SAFETY-KLEEN SYSTEMS, INC. 42 LONGWATER DR. NORWELL, MA 02061 PHONE 800-669-5740					
SCALE	BY	CHKD	P.E. APPR	OP. APPR	DATE
NONE	PROJSOL				2-5-03
SERVICE CENTER LOCATION			SC-DWG-REV NO.		SHEET NO.
STANDARD			BSD 940		

APPENDIX C  
MAPS AND FACILITY DRAWINGS

Exhibit C-1  
Site Location Map

# Tulsa



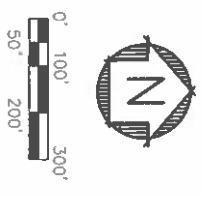
↑ Emergency Exit

✘ Fire Extinguisher

□ Rally Point

✘ Fire Hydrant

Exhibit C-2  
Topographic Map



ENLARGED FACILITY MAP

- NOTES:**
- ELEVATIONS BASED ON:  
GOOGLE ELEVATION DATA SET (MORUD 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

**SITE TOPO MAP**  
**16319 E. MARSHALL**  
**TULSA, OK. 74116**

**SAFETY-KLEEN SYSTEMS, INC.**  
 42 LONGWATER DR., NORWELL, MA 02061  
 PHONE: 781-792-5800

REV. NO.	DATE	OPERATIONS	SC-DWG NUMBER	SERVICE CENTER LOCATION														
0	9/9/24	JZ	7015-SP00-026	TULSA, OK.														
<table border="1"> <thead> <tr> <th>REV. NO.</th> <th>DATE</th> <th>BY</th> <th>CHKD</th> <th>APPR</th> <th>DATE</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>09/09/24</td> <td>JZ</td> <td>JZ</td> <td>JZ</td> <td>09/09/24</td> <td>ISSUED FOR PERMIT</td> </tr> </tbody> </table>					REV. NO.	DATE	BY	CHKD	APPR	DATE	DESCRIPTION	1	09/09/24	JZ	JZ	JZ	09/09/24	ISSUED FOR PERMIT
REV. NO.	DATE	BY	CHKD	APPR	DATE	DESCRIPTION												
1	09/09/24	JZ	JZ	JZ	09/09/24	ISSUED FOR PERMIT												

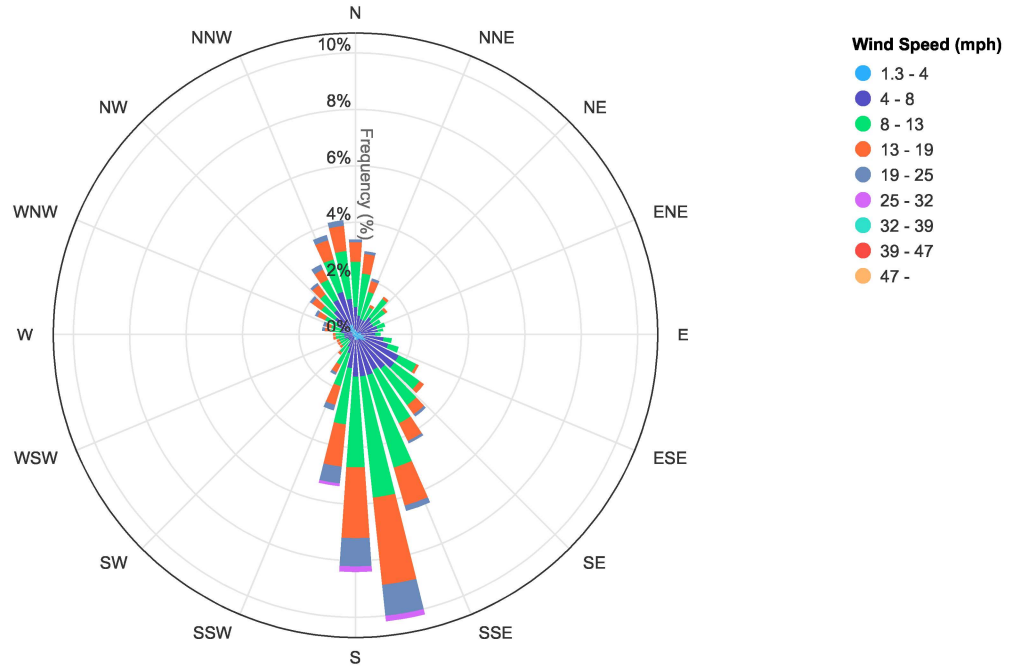
Exhibit C-2

Exhibit C-3  
Wind Rose Diagram

EXHIBIT C-3

**TULSA INTL AP (OK) Wind Rose**

May 1, 2000 - May 3, 2024  
Sub-Interval: Jan. 1 - Dec. 31, 0 - 23



**TULSA INTL AP (OK) - Wind Frequency Table (percentage)**

Latitude : 36.1994      Start Date : May 1, 2000      Sub Interval Windows  
Longitude : -95.8872      End Date : May 3, 2024      Start End  
Elevation : 650 ft.      # of Days : 8769 of 8769      Date Jan. 1 Dec. 31  
Element : Mean Wind Speed      # obs : 204984 of 210456      Hour 0 23

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

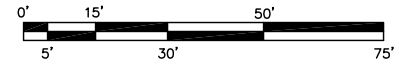
Range (mph)	0	10	20	30	40	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	200	210	220	230	240	250	260	270	280
1.3 - 4	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.3	0.3	0.4	0.3	0.2	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
4 - 8	0.8	0.6	0.5	0.5	0.7	0.6	0.6	0.6	0.6	0.5	0.7	0.9	1.3	1.4	1.3	1.2	1.3	1.3	1.3	1.0	0.6	0.4	0.2	0.2	0.2	0.3	0.3	0.3	0.4
8 - 13	1.6	1.5	1.0	0.5	0.8	0.6	0.3	0.3	0.2	0.2	0.3	0.4	0.7	1.1	1.6	2.1	3.4	4.3	3.2	2.0	1.2	0.7	0.5	0.3	0.3	0.2	0.3	0.3	0.4
13 - 19	0.7	0.7	0.4	0.1	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.2	0.4	0.7	1.4	3.1	2.5	1.5	0.7	0.3	0.1	0.1	0.1	0.1	0.1	0.2
19 - 25	0.1	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.2	1.1	1.0	0.6	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.1
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	0.2	0.2	0.1	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(%)	3.4	3.0	2.0	1.2	1.8	1.4	1.1	1.0	1.0	1.0	1.3	1.7	2.5	3.1	3.6	4.2	6.6	10.2	8.4	5.4	2.9	1.6	0.9	0.7	0.7	0.7	0.8	0.8	1.1
Calm (<1.3)																													
Ave Speed	10.6	10.8	10.2	8.5	8.5	7.8	7.0	6.5	6.3	6.4	6.3	6.4	7.0	7.8	8.9	9.8	10.8	12.9	13.0	12.4	11.5	10.4	9.2	9.0	9.1	9.2	9.1	9.3	9.8

Midwestern Regional Climate Center cli-MATE: MRCC Application Tools Environment Generated at: 5/3/2024 12:40:38 PM EDT

Exhibit C-4  
Site Plan

GENERAL NOTES

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORP. ANY REPRODUCTION, DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITING.



LEGEND:  
 (D) - 'DANGER' SIGN

PROPRIETARY STATEMENT

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TITLE		SITE PLAN 16319 E. MARSHALL	
 SAFETY-KLEEN SYSTEMS, INC. 42 LONGWATER DR. NORWELL, MA 02061 PHONE 800-669-5740		SCALE	BY
1" = 20'-0"	WEY	CHKD	P.E. APPR
			DP. APPR
			DATE
			11/19/89
SERVICE CENTER BRANCH AT		STD-DWG-REV NO.	
TULSA, OKLAHOMA		7105-SP00-001	

NO.	DESCRIPTION	BY	CHK	APPR	DATE
02	REVISE FOR 2011 PERMIT	JEK	AG	AG	9-13-11
01	REMOVE REFERENCE FOR VERTICAL TANK FARM AND TANKER PAD. SHOW REG OFFICE	WEY			12-4-95
00	REVISED SAFETY KLEEN DRAWING TO CADD AS DATED. REPLACES SAFETY KLEEN DRAWING D-12579	ALI			2-14-91
REVISIONS					

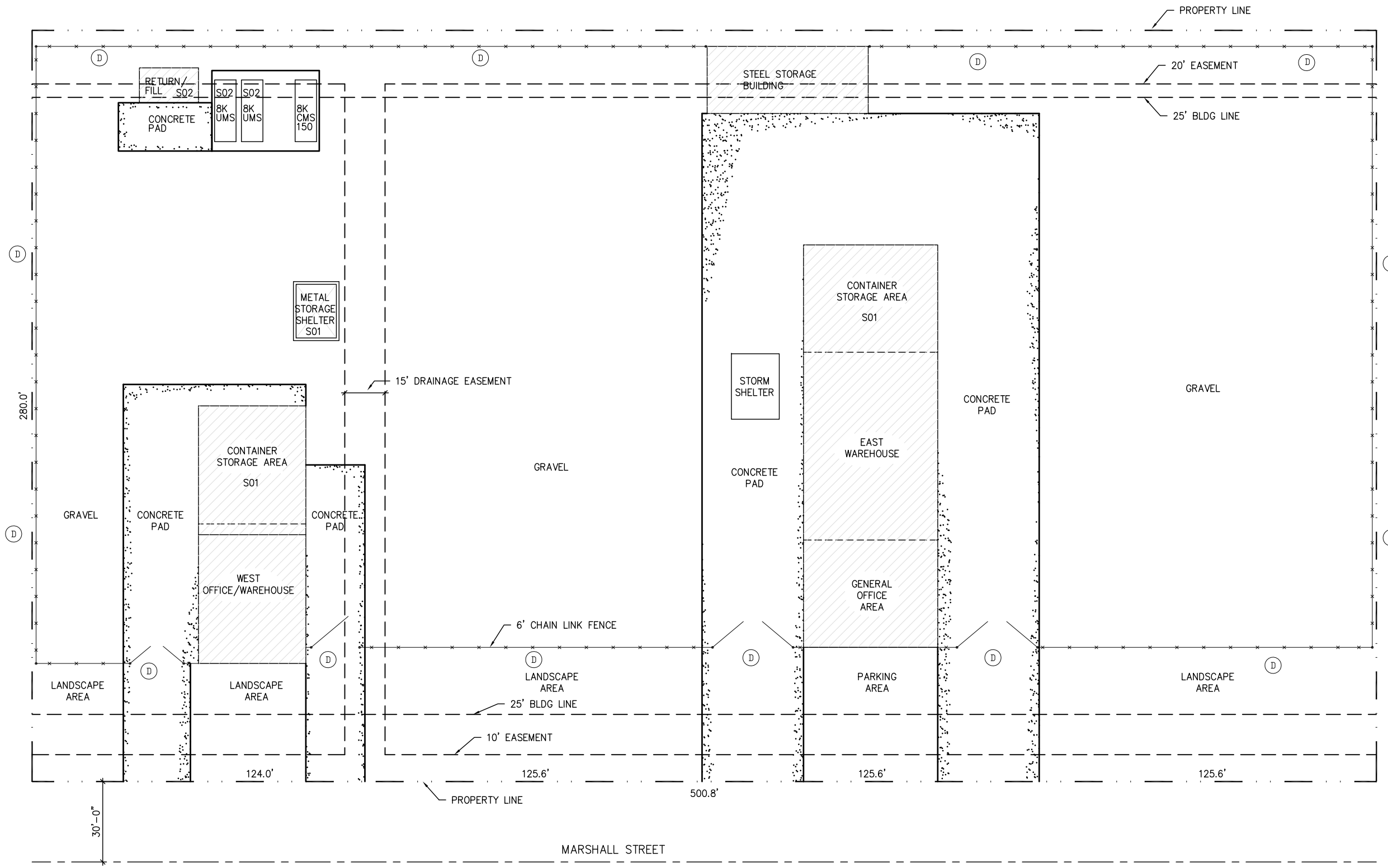
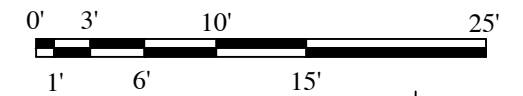


Exhibit C-5

East Warehouse Floor Plan



CONCRETE DRIVE

150'-0"

PARKING AREA

4' SIDE WALK

OFFICE

EAST WAREHOUSE

CONTAINER STORAGE AREA

TWO CLOSED COLLECTION  
12' X 2' X 2.5' TRENCHES  
(897 GALLONS)

4" HIGH X 6" WIDE  
CONTAINMENT CURB

51'-0"

CONCRETE DRIVE

EXHIBIT C-5

**PROPRIETARY STATEMENT**

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TITLE  
EAST WAREHOUSE  
16319 E. MARSHALL ST

**SAFETY-KLEEN SYSTEMS, INC.**  
42 LONGWATER DR. NORWELL, MA 02061  
PHONE 800-669-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	ISSUED FOR PERMIT.	JEK	JZ	JZ	050624
1	REVISED FOR 2011 PERMIT.	JEK	AG	AG	091311
REVISIONS					

SCALE	BY	CHKD	P.E. APPR	OP. APPR	DATE
3/16"=1'	WEY	-	-	-	10-27-95
SERVICE CENTER BRANCH AT TULSA, OK					STD-DWG-REV NO. 7105-WB01-001

Exhibit C-6

West Warehouse Floor Plan

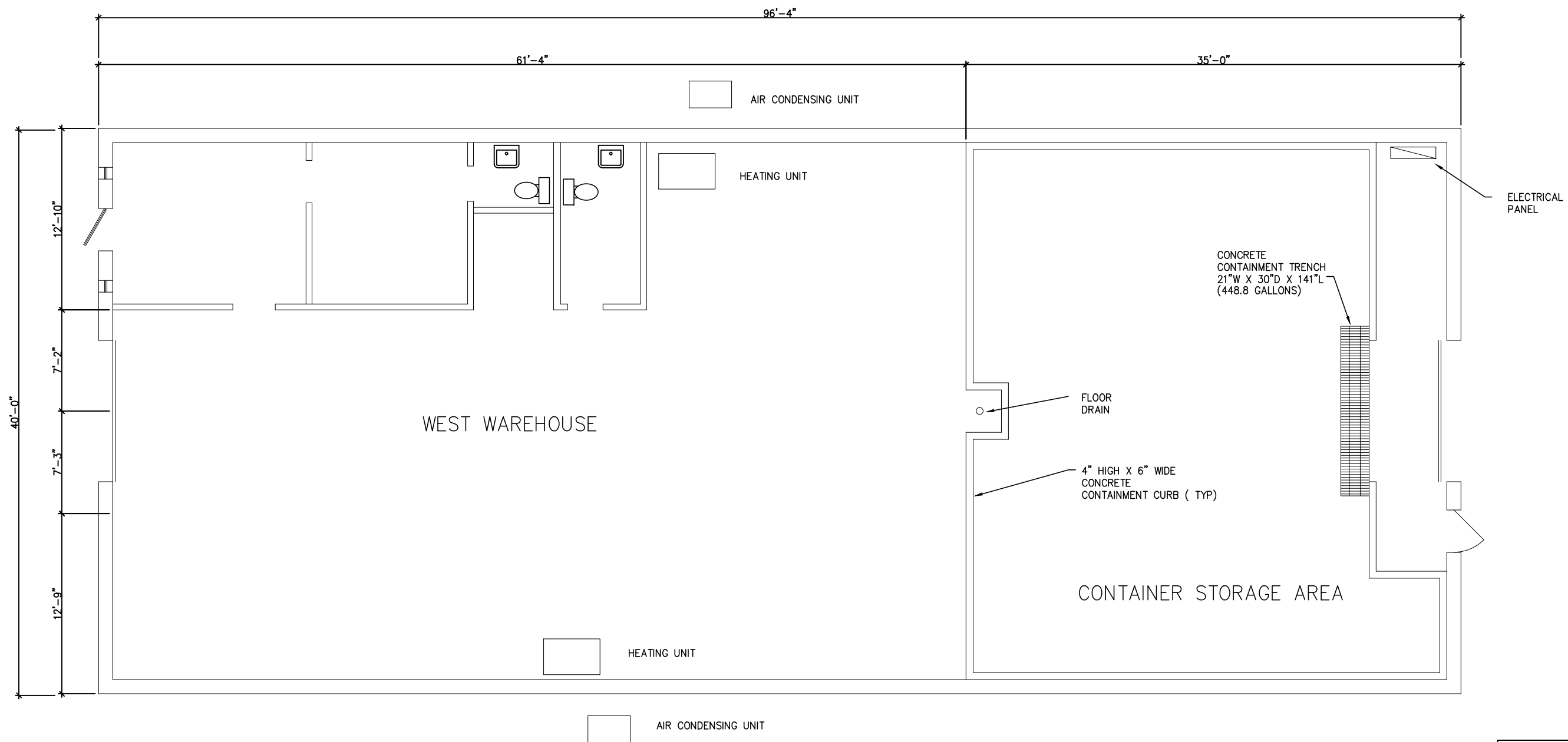
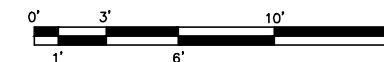


EXHIBIT C-6

PROPRIETARY STATEMENT

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TITLE  
WEST WAREHOUSE  
16125 E. MARSHALL ST

**SAFETY-KLEEN SYSTEMS, INC.**  
42 LONGWATER DR. NORWELL, MA. 02061  
PHONE: 800-669-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	ISSUED FOR PERMIT.	JEK	JZ	JZ	050624
1	REVISED FOR 2011 PERMIT	JEK	AG	AG	091311
REVISIONS					

SCALE	BY	CHKD	P.E. APPR	DP. APPR	DATE
1/4"=1'	WEY	-	-	-	10-27-95
SERVICE CENTER BRANCH AT TULSA, OK					STD-DWG-REV NO. 7105-WB02-001

Exhibit C-7  
FEMA Floodplain Map

**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 table in the Flood Insurance Study Report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations table 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 Oklahoma State Plane North Zone (FIPS zone 3501). The **horizontal datum** was NAD 83, GRS 1980 spheroid. Differences in datum, spheroid, projection or UTM 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  
NOAA, NNGS12  
National Geodetic Survey  
SSMC-3, #9202  
1315 East-West Highway  
Silver Spring, Maryland 20910-3282

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 provided in digital format by the Geo Information Systems Department of the University of Oklahoma and the Indian Nations Council of Governments (INCOC). Aerial background provided by the USDA Farm Service Agency's National Agriculture Imagery Program (NAIP) flown in 2010.

This map reflects more detailed and up-to-date **stream channel configurations** than those shown on the previous FIRM for this jurisdiction. The floodplains and floodways that were transferred from the previous FIRM may have been adjusted to conform to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables for multiple streams 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.

**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.

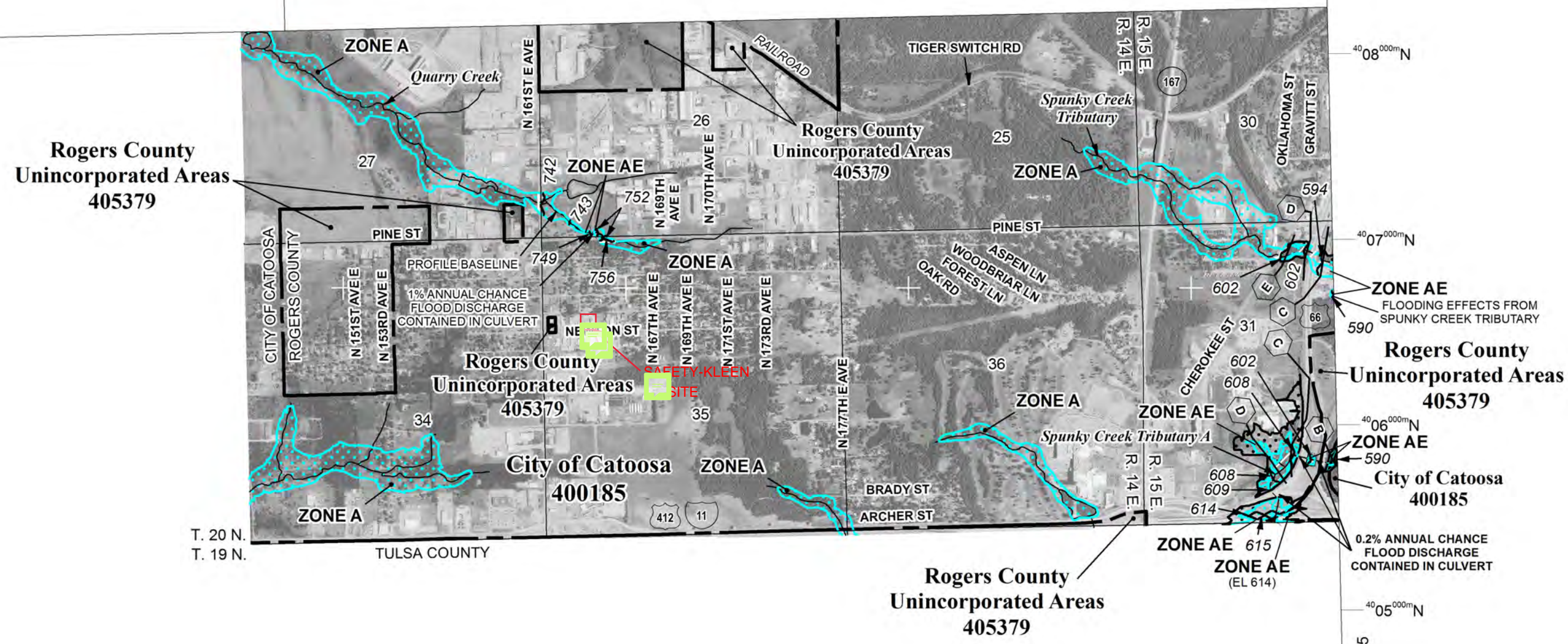
Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels, community map repository addresses, and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which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

For information on available products associated with this FIRM visit the **Map Service Center (MSC)** website at <http://msc.fema.gov>. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the MSC website.

If you have **questions about this map**, how to order products, or the National Flood Insurance Program in general, please call the **FEMA Map Information Exchange (FMIX)** at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA website at <http://www.fema.gov/national-flood-insurance-program>.

THIS AREA SHOWN AT A SCALE OF 1" = 1000' ON MAP NUMBER 40131C0330

THIS AREA SHOWN AT A SCALE OF 1" = 1000' ON MAP NUMBER 40131C0335



**LEGEND**

- SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD
- The 1% annual chance 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, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.
- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** 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 Areas formerly protected from the 1% annual chance flood by a flood control system that was subsequently described. 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 Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations 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.
- Limit of Moderate Wave Action
- 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
- Transect line
- Culvert
- Bridge
- 45° 02' 08", 93° 02' 12" Geographic coordinates referenced to the North American Datum of 1983 (NAD 83) Western Hemisphere
- 3100000 FT 5000-foot ticks: Oklahoma State Plane North Zone (FIPS Zone 3501), Lambert Conformal Conic projection
- 1000-meter Universal Transverse Mercator grid values, zone 15N
- DX5510 X Bench mark (see explanation in Notes to Users section of this FIRM panel)
- M.1.5 River Mile
- MAP REPOSITORIES Refer to Map Repositories list on Map Index
- EFFECTIVE DATE OF COUNTYWIDE FLOOD INSURANCE RATE MAP April 3, 2012
- EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL
- September 30, 2016 - to change Base Flood Elevations and Special Flood Hazard Areas.
- 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.
- 
- MAP SCALE 1" = 2000'
- 1000 0 2000 4000 FEET
- 600 0 600 1200 METERS

**NATIONAL FLOOD INSURANCE PROGRAM**

PANEL 0350J

**FIRM**

**FLOOD INSURANCE RATE MAP**

**ROGERS COUNTY, OKLAHOMA AND INCORPORATED AREAS**

PANEL 350 OF 475  
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
CATOOSA, CITY OF	400185	0350	J
ROGERS COUNTY	405379	0350	J

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 40131C0350J  
MAP REVISED SEPTEMBER 30, 2016


Federal Emergency Management Agency

## Exhibit C-8



**CITY OF CATOOSA  
ZONING**

- Legend**
- Catocosa Corporate Units
  - Agriculture
  - Commercial
  - Industrial
  - Mining District
  - Offices
  - Parking
  - Residential Multi-Family
  - Residential Single-Family


  
 0 500 1000 2000 Feet
   
 Prepared by WCDG 12/20/2018
   
 Eureka, CA

APPENDIX D  
ANALYTICAL DATA

## Exhibit D-1

### Annual Recharacterization Statistical Model

**Robert D. Gibbons, PhD**

Blum-Riese Professor of Biostatistics  
Committee on Quantitative Methods in Social, Behavioral and Health Sciences  
Director, Center for Health Statistics  
[rdg@uchicago.edu](mailto:rdg@uchicago.edu)

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 50<sup>th</sup> 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 limit<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup> Specifically, following U.S. EPA SW846, we construct a nonparametric 90% upper confidence limit (UCL) for the 50<sup>th</sup> 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.

---

<sup>1</sup>"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.

<sup>2</sup>"The upper limit of the CI for  $\mu$  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

<sup>3</sup>"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.<sup>4</sup>

Nonparametric confidence limits are derived as follows. Given an unknown  $P \times 100$ th percentile of interest (e.g. the 50th percentile or median),<sup>5</sup> 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.

---

<sup>4</sup>“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

<sup>5</sup>“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
<b>7.100</b>	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 D-2

### Annual Recharacterization Data Summary (Sample)

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		150045			150045
	over 100 lbs (RQ)	No Change	D001, D018, D039, D040	150085	No Change	D001, D018, D039, D040	150085
	Non-RQ DF container (no DOT SP)	No Change		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		150055			150055
	DF container (no DOT SP)	No Change	D039	157055	No Change	D039	157055
	under 100 lbs	No Change		150380			150380
Paint Gun Cleaner	over 100 lbs (RQ)	No Change	F003, F005, D001, D018, D035, D039, D040	150425	No Change	F003, F005, D001, D018, D035, D039, D040	150425
	under 100 lbs	No Change		158380			158380
Paint Gun Cleaner (Premium Thinner)	over 100 lbs (RQ)	No Change	F003, F005, D001, D018, D035, D039, D040	158381	No Change	F003, F005, D001, D018, D035, D039, D040	158381
	under 100 lbs	No Change		150426			150426
Clear Choice Paint Gun Cleaner	over 100 lbs (RQ)	No Change	F003, D001, D018, D035, D039, D040	150427	No Change	F003, D001, D018, D035, D039, D040	150427
	under 100 lbs	No Change		150375			150375
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

APPENDIX E  
EQUIPMENT INFORMATION

Exhibit E-1  
Tank Farm Plan

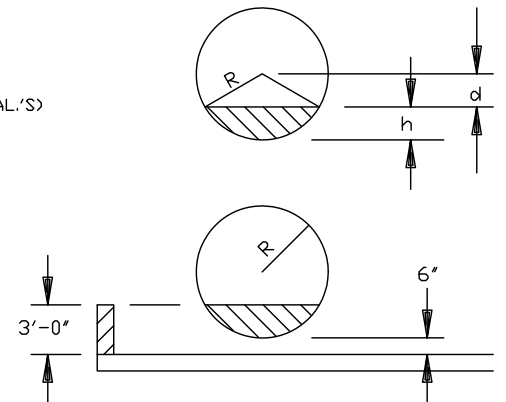
**DIKE VOLUME CALCULATION**

**FORMULAE USED:**

$$A = R^2 \cos^{-1} d/R - d \sqrt{R^2 - d^2}$$

$$(LWH) (7.48 \text{ GAL./S/CU. FT.}) = \text{DIKE VOLME (GAL.'S)}$$

L(DIKE LENGTH) = 39.67 FT (39'-8" I.D.)  
 W(DIKE WIDTH) = 28.83 FT (28'-10" I.D.)  
 H(DIKE HEIGHT) = 2.0 FT. (2'-0")  
 R = 4.0' (4'-0")  
 h = (2'-0") - (0'-6") = 1'-6" (1.5')  
 d = (4'-0") - (1'-6") = 2'-6" (2.5')  
 A = 6.525 FT.<sup>2</sup>



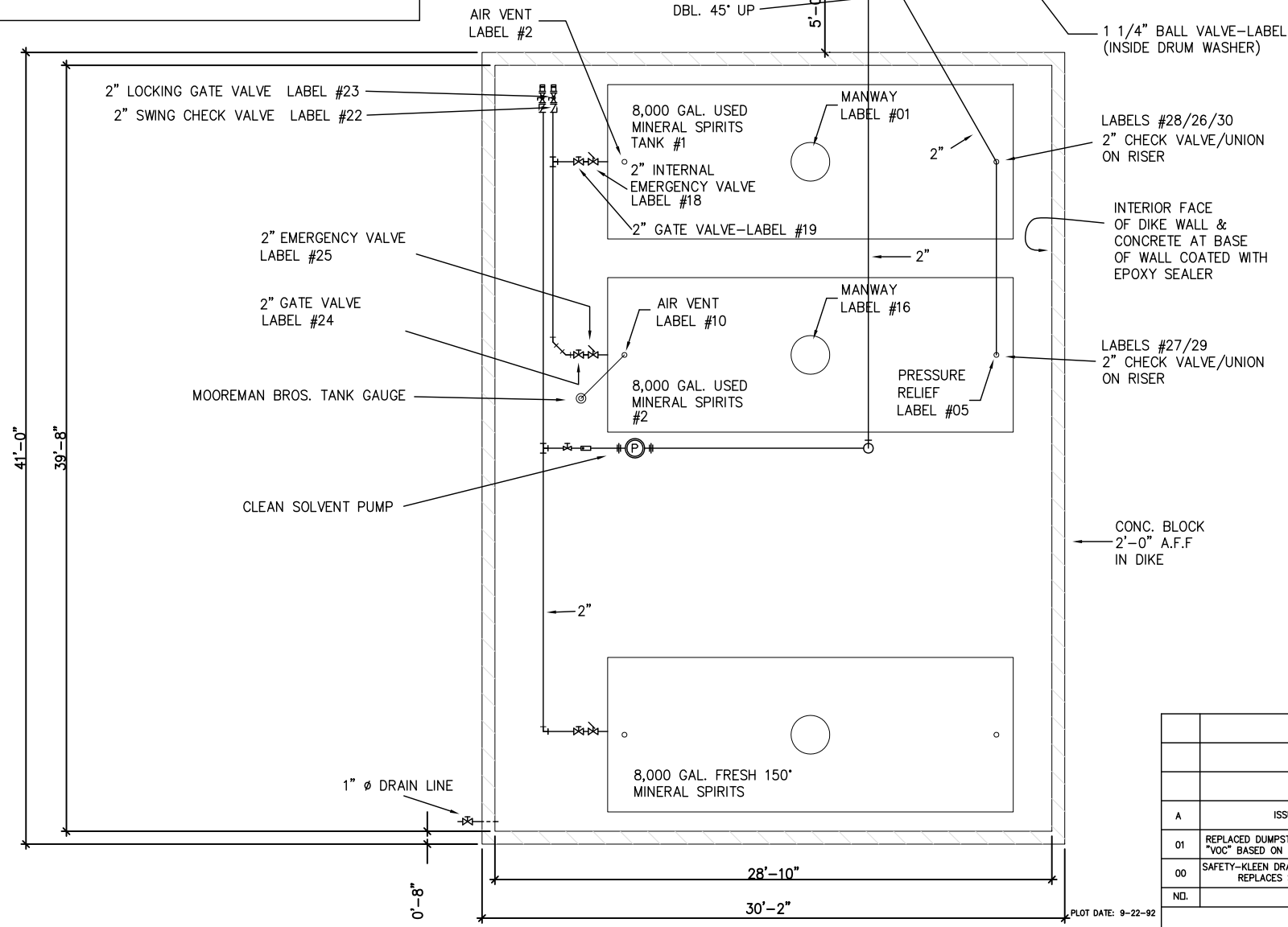
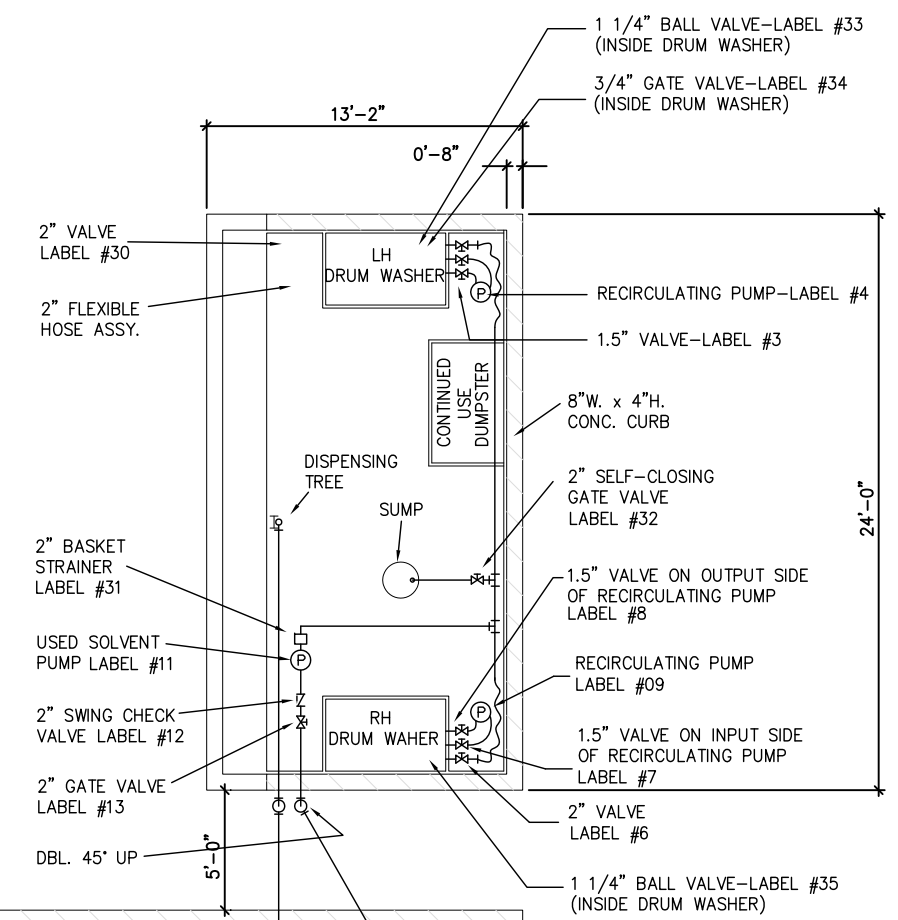
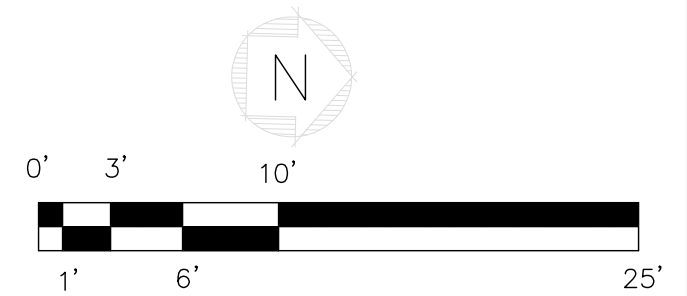
DIKE VOLUME: (39.67 FT.) (28.83 FT.) (2.0 FT) (7.48 GAL./S/CU. FT.) = 17,110 GAL./S

VOLUME OF LARGEST TANK WITHIN DIKED AREA: 8,000 GAL./S

**TANK DISPLACEMENT VOLUME:**

$$(6.525 \text{ FT.} \times 2 \text{ TANKS} \times 21'-4" \times 7.48 \text{ GAL./S/FT.}) = 2,082 \text{ GAL./S}$$

DIKE CONTAINMENT VOLUME	17,110 GAL./S
DISPLACEMENT VOLUME	-2,082 GAL./S
	15,028 GAL./S
VOLUME LARGEST TANK	-8000 GAL./S
	7,028 GAL./S
24hr25yr RAINFALL	
39.67' X 28.83' X 6.8' X 7.48 GAL./CF =	-4,848 GAL./S
TOTAL EXCESS	2,180 GAL./S



**EXHIBIT E-1**

**PROPRIETARY STATEMENT**

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NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	ISSUED FOR PERMIT	JEK	JZ	JZ	050624
01	REPLACED DUMPSTER WITH DRUM WASHER/ REPLACES "VOC" BASED ON BFM INFO.	ALI			9-22-92
00	SAFETY-KLEEN DRAWING CONVERTED TO CADD AS DATED REPLACES SAFETY-KLEEN DRAWING E11177	JDG			4-11-91

TITLE					
TANK FARM 16319 E. MARSHALL					
<b>SAFETY-KLEEN SYSTEMS, INC.</b>					
<small>42 LONGWATER DR. NORWELL, MA 02061 PHONE 800-669-3740</small>					
SCALE	BY	CHKD	P.E. APPR	DP. APPR	DATE
1/4" = 1'-0"	-	-	-	-	-
SERVICE CENTER BRANCH AT					STD-DWG NO.
TULSA, OK					7105-4100-310

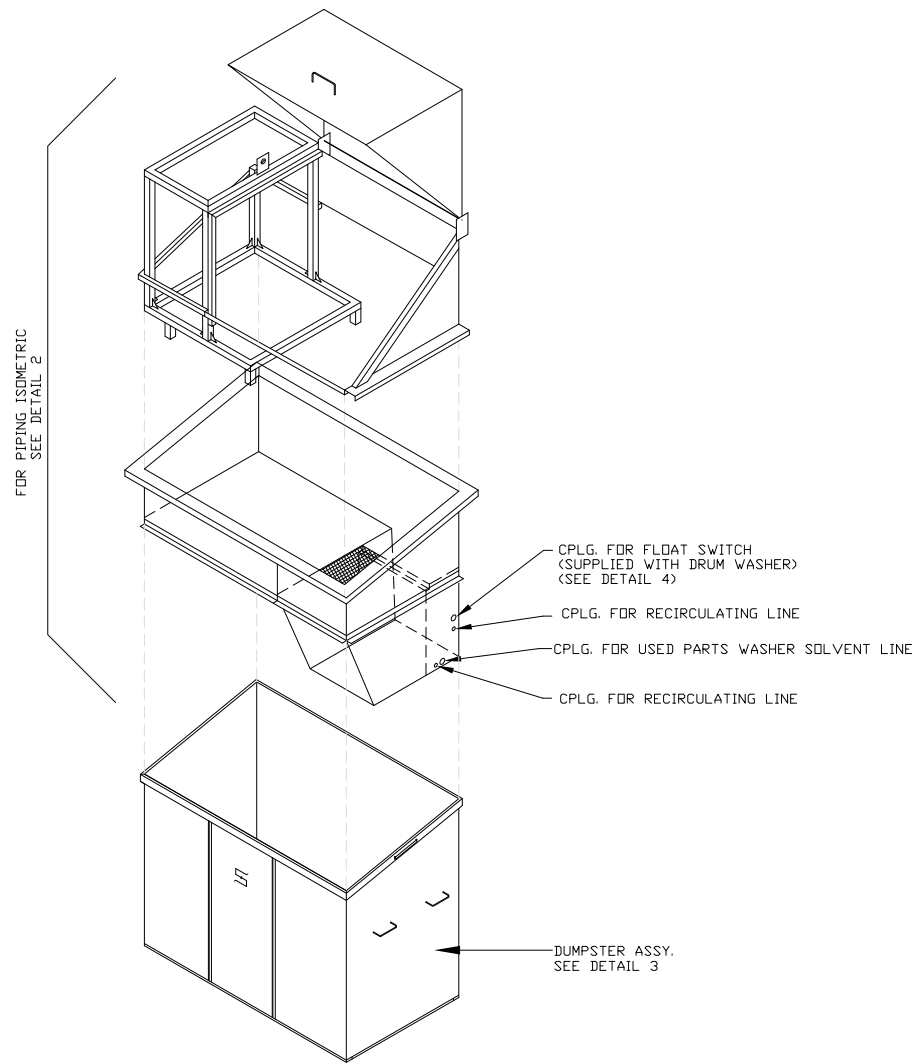
PLOT DATE: 9-22-92

REVISIONS

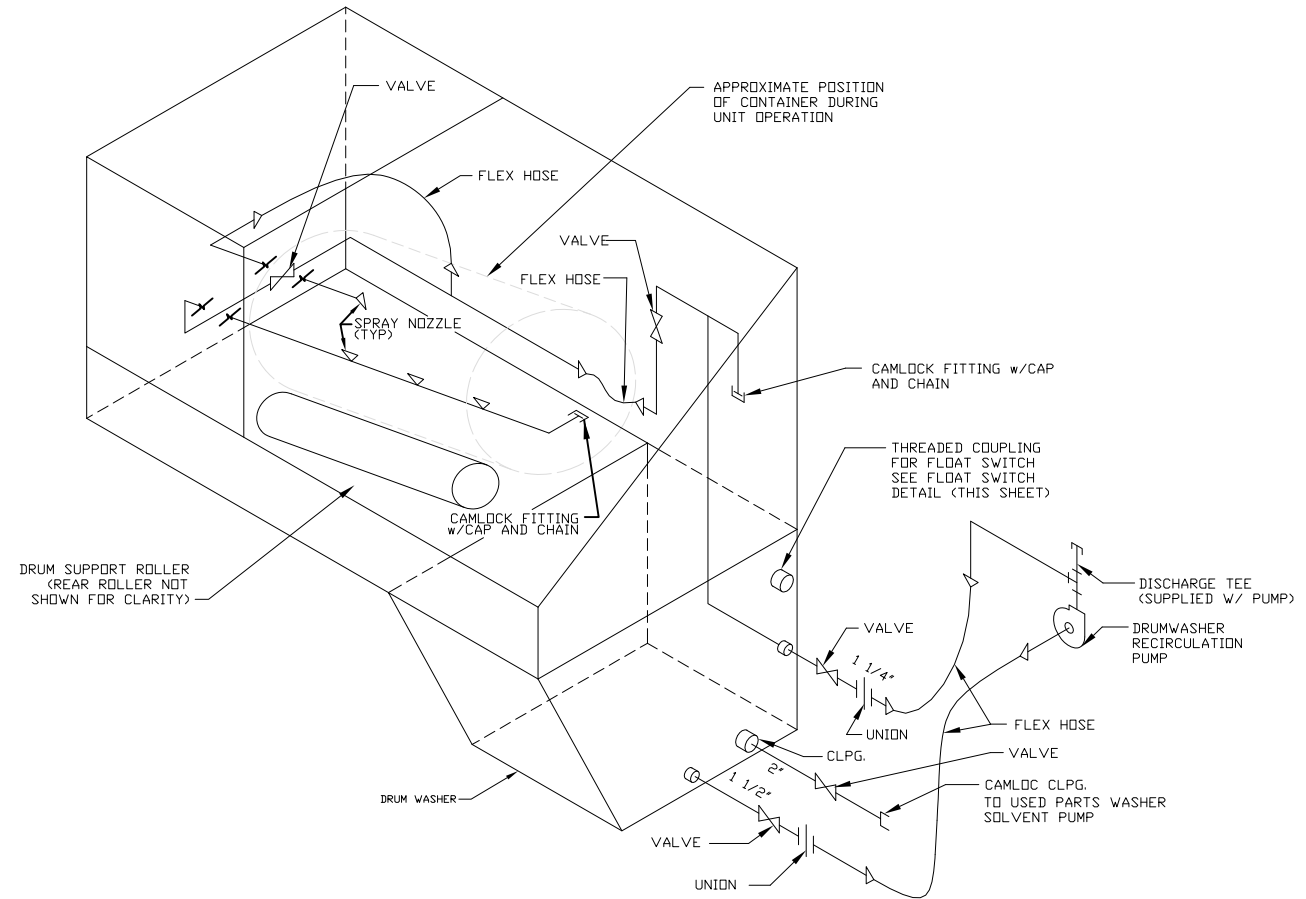
## Exhibit E-2

### Drum Washer Schematic and Details

DUMPSTER/BARREL WASHER ASSY – DETAIL 1



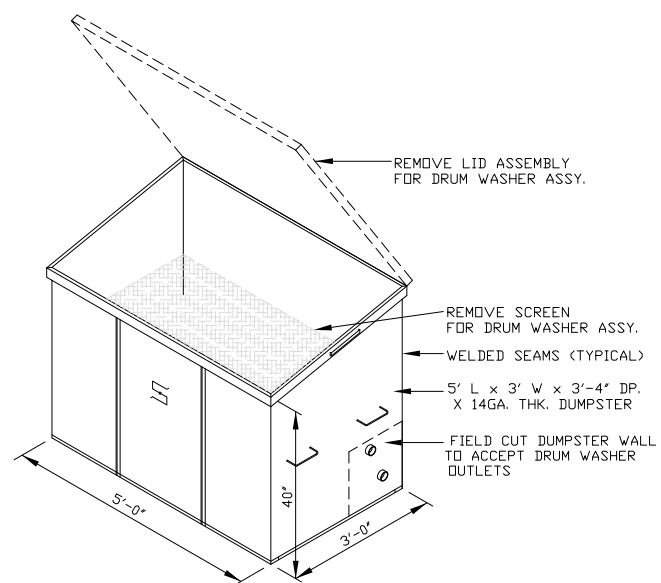
BARREL WASHER PIPING ISOMETRIC – DETAIL 2



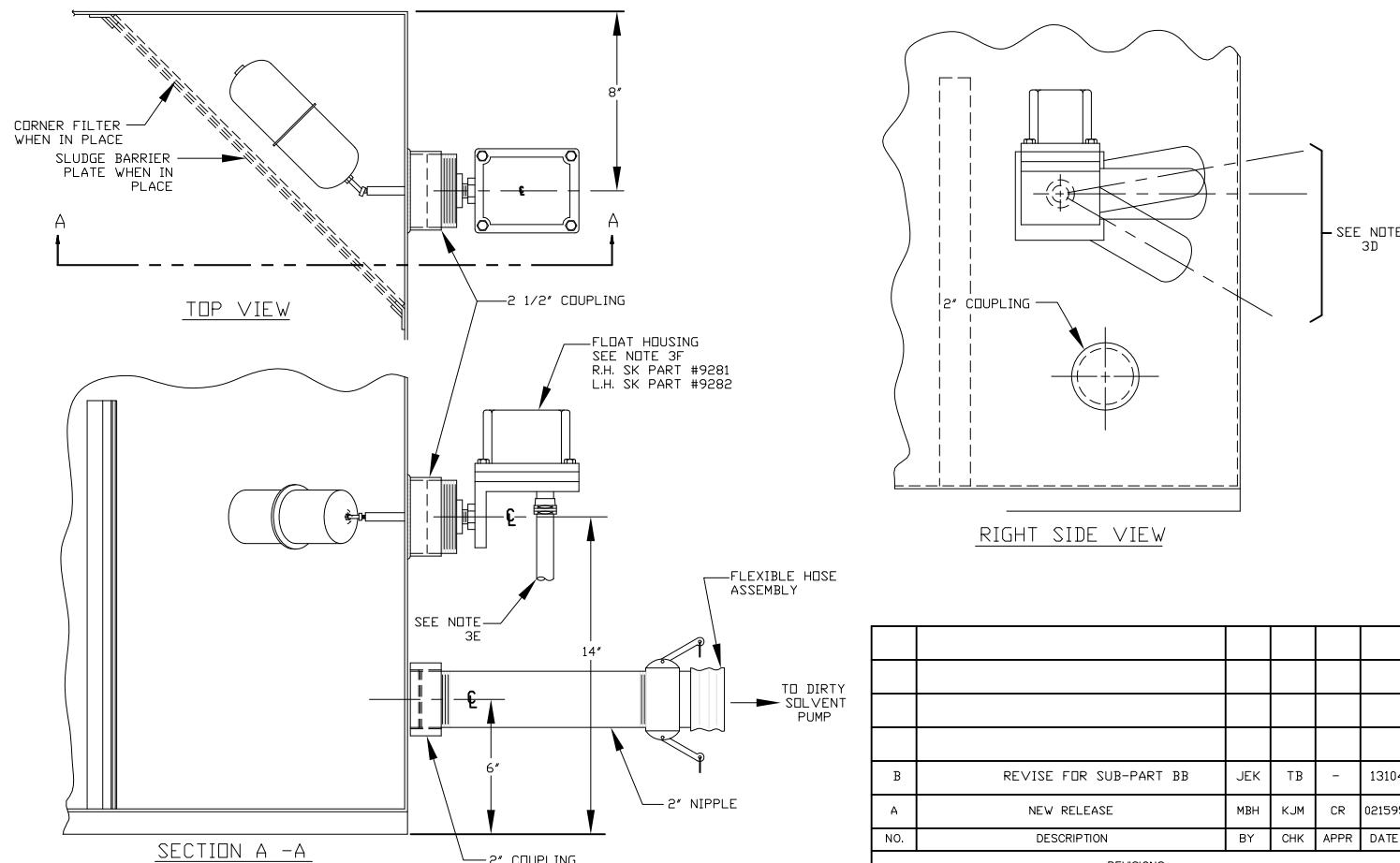
GENERAL NOTES

- 1) THE BARREL WASHER UNIT AND DUMPSTER ARE SUPPLIED BY SAFETY-KLEEN CORP. AND COMBINED BY CONTRACTOR. RECIRCULATING PUMP, AND VALVES FOR DRUM WASHER ARE SUPPLIED BY SAFETY-KLEEN CORP. AND INSTALLED WITH CONTRACTOR SUPPLIED PIPE UNIONS AND HOSES.
9. ALL ITEMS WITH SAFETY-KLEEN PART NO. REFERENCES WILL BE SUPPLIED TO CONTRACTOR.
3. FLOAT SWITCH INSTALLATION INSTRUCTIONS
  - A. TAKE FLOAT SWITCH AND WRAP CLOCKWISE WITH 2 TEFLON WINDS OF TAPE AND INSTALL INTO 2 1/2" COUPLING ON OUTSIDE OF DUMPSTER
  - B. TAKE FLOAT AND THREAD IT INTO THE FLOAT SWITCH FROM THE INSIDE SHAFT OF THE DUMPSTER AND TIGHTEN SECURELY.
  - C. RELEASE SHIPPING BRACKET BY REMOVING SCREW AND DISCARDING BRACKET.
  - D. FLOAT TRAVEL SETTING ADJUSTMENTS CAN BE ACCOMPLISHED BY LOOSENING ADJUSTMENT SCREWS. THE FLOAT TRAVEL ARC SHOULD BE SET AT 10° TRAVEL UP AND 30° TRAVEL DOWN (SEE CALIBRATION ON DIAL). SEE RIGHT SIDE VIEW.
  - E. FLOAT SWITCH SHOULD BE WIRED UP ACCORDING TO MFGRS. SPECS AND IN COMPLIANCE WITH ANY LOCAL CODES. (USE RIGID CONDUIT THROUGHOUT).
  - F. FLOAT SWITCH TO BE INSTALLED ON SAME SIDE OF DUMPSTER AS DRAIN LINE. INSTALLATION SHOWN IS FOR RIGHT HAND SIDE OF DUMPSTER. FLOAT SWITCH IS SQUARE D CLASS 9037 HR - 3 (RIGHT HAND) OR HR - 4 (LEFT HAND).
  - G. RE-ADJUST FLOAT STOPS TO THOSE SHOWN ON RIGHT SIDE VIEW.
  - H. WHEN DUMPSTER DOES NOT HAVE A 2 1/2" COUPLING, ONE SHOULD BE ON (LIQUID TIGHT) TO DIMENSIONS SHOWN.

DUMPSTER ASSY. – DETAIL 3



FLOAT SWITCH INSTALLATION – DETAIL 4



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TITLE  
DRUM WASHER/DUMPSTER ISOMETRIC

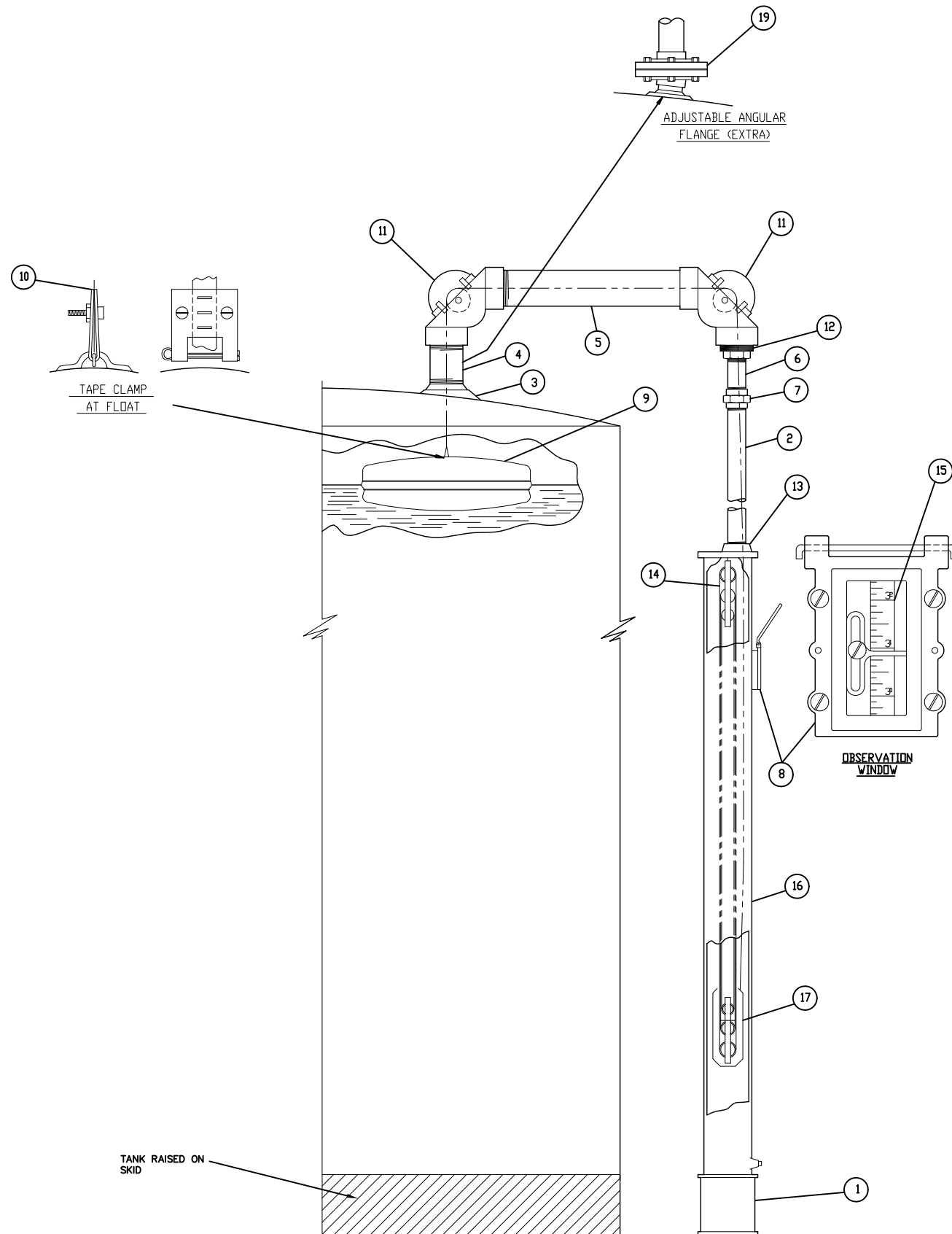
**SAFETY-KLEEN SYSTEMS, INC.**  
42 LONGWATER DR. NORWELL, MA. 02061  
PHONE 800-669-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
B	REVISE FOR SUB-PART BB	JEK	TB	-	13104
A	NEW RELEASE	MBH	KJM	CR	021595
REVISIONS					

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
NONE	MBH	KJM	CR		02-08-95
SERVICE CENTER LOCATION			SC-DWG NUMBER		REV. NO.
TULSA, OK.			7105-5600-299		B

## Exhibit E-3

### Moorman Brothers Tank Gauge Installation Details



**MODEL 7-S VERTICAL BULK  
STORAGE TANK GAUGE**

**MATERIAL LIST  
MODEL 7-S**

PART NAME	PART NO.	QUANTITY PER UNIT
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.		
8. OBSERVATION WINDOW ASSEMBLY	A-34-A-38	1
9. FLOAT	V-75	1
10. STAINLESS STEEL TAPE CLAMP & SCREWS	V-93	1
11. ELBOW ASSEMBLY COMPLETE	A-30, A-33	2
12. 2" TO 1" REDUCING BUSHING		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. RUST-PROOFED STEEL GAUGE HOUSING	V-77	1
17. COUNTERWEIGHT	V-72	2
18. CONDENSATION DRAIN PLUG		1
FRAME & LID ASSEMBLY FOR OBSERVATION WINDOW	A-34, A-38	1
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
WIRE PIN - STAINLESS STEEL	V-96	5

**PROPRIETARY STATEMENT**

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**GENERAL NOTES**

- ACTUAL EQUIPMENT CONFIGURATION MAY VARY DUE TO MAINTENANCE/ UPKEEP OF FACILITY.

TITLE  
MOORMAN BROS. TANK GAUGE DET.

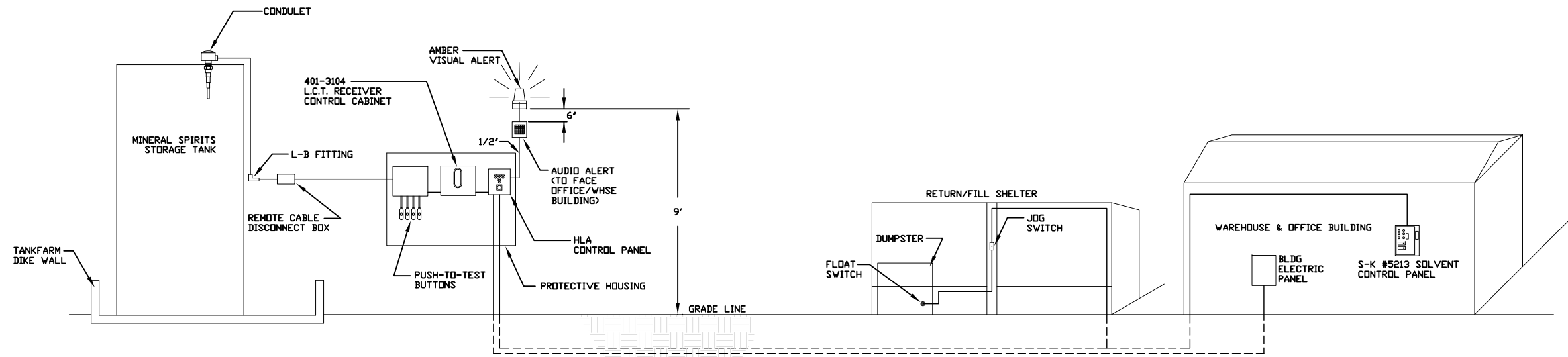
**SAFETY-KLEEN SYSTEMS, INC.**  
42 LONGWATER DR. NORWELL, MA. 02061  
PHONE 800-888-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
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A	RELEASED FOR PART "B" PERMIT	MBH	KJM	-	070292
REVISIONS					

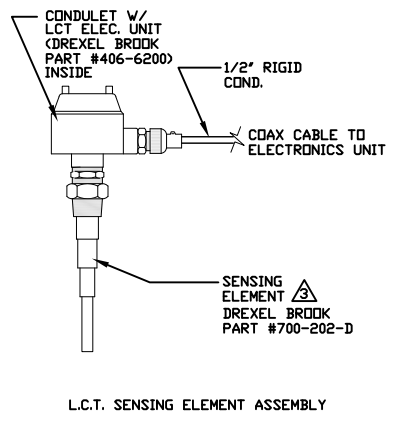
SCALE	BY	CHKD	APPR	OP. APPR	DATE
N.T.S.	MBH	KJM	-	-	06-30-92
SERVICE CENTER LOCATION		SC-DWG NUMBER		REV. NO.	
TULSA, OK.		7105-4100-298		B	

## Exhibit E-4

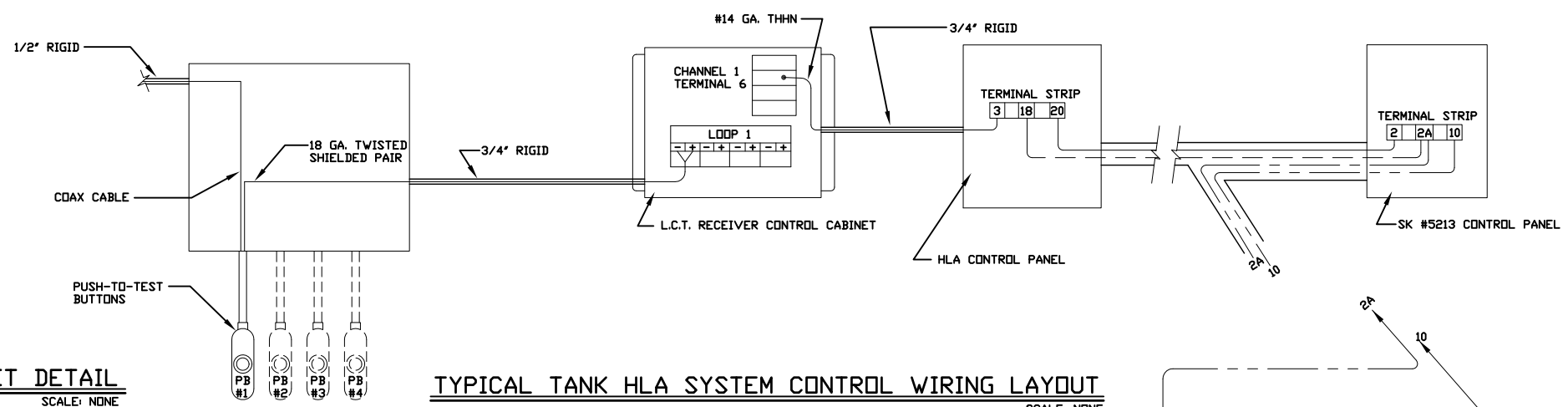
### Spent Parts Washer Solvent High Level Alarm System Details



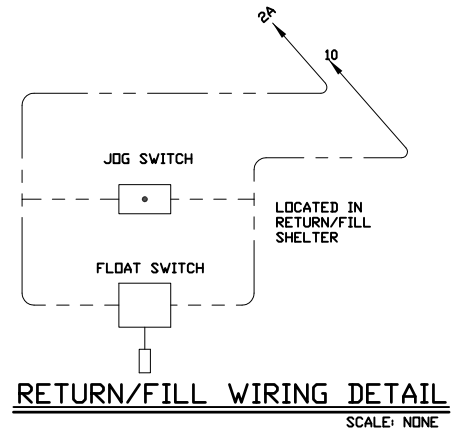
**HIGH LEVEL ALARM SYSTEM DIAGRAM**  
SCALE: NONE



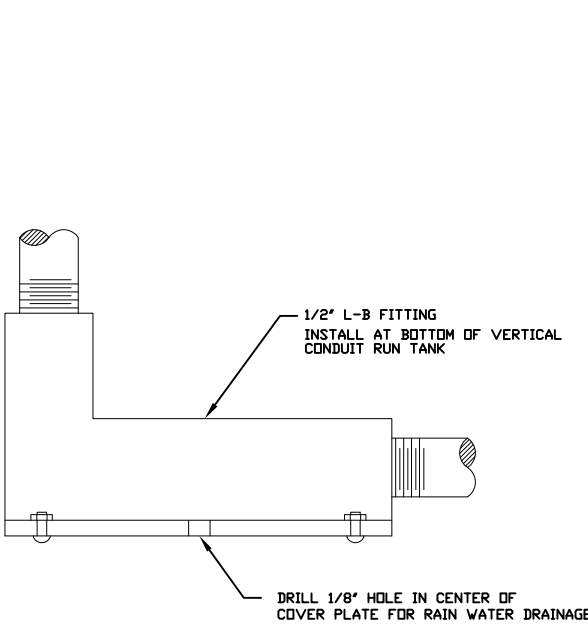
**L.C.T. SENSING ELEMENT AND CONDULET DETAIL**  
SCALE: NONE



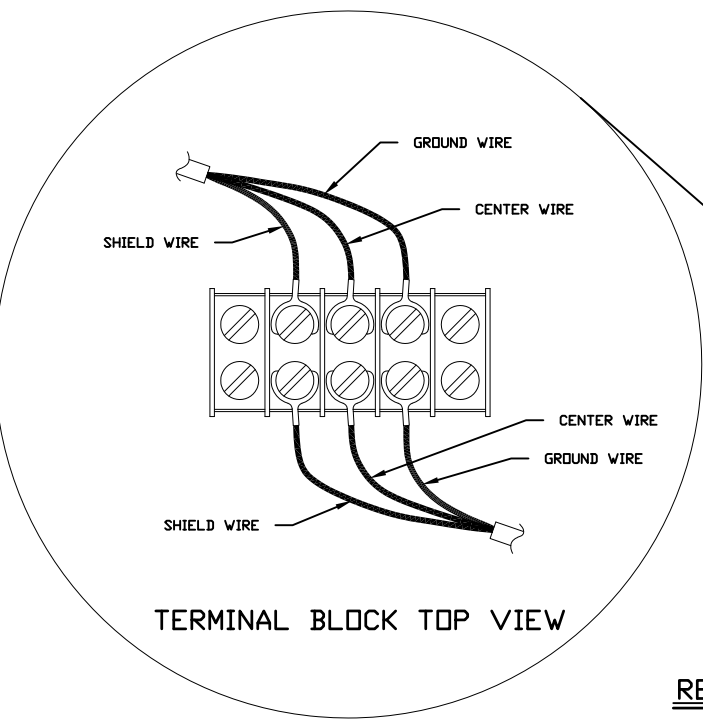
**TYPICAL TANK HLA SYSTEM CONTROL WIRING LAYOUT**  
SCALE: NONE



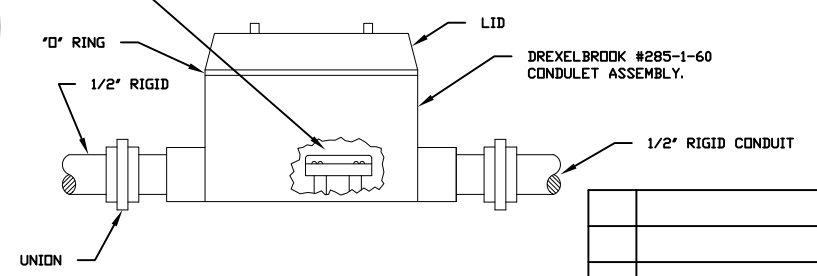
**RETURN/FILL WIRING DETAIL**  
SCALE: NONE



**L-B FITTING INSTALLATION DETAIL**  
SCALE: NONE



**TERMINAL BLOCK TOP VIEW**



**REMOTE CABLE DISCONNECT BOX DETAIL**  
SCALE: NONE

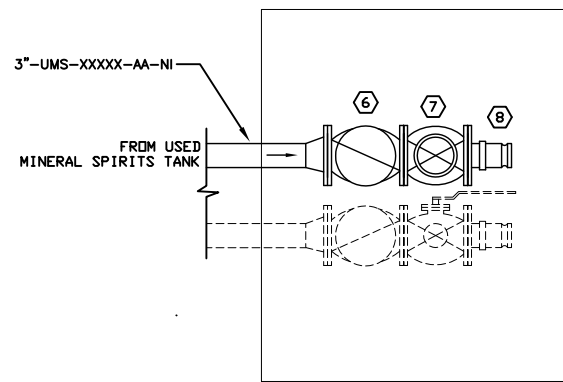
- GENERAL NOTES**
1. L. C. T. = LEVEL CONTROL TRANSMITTER
  2. ALL ELECTRICAL WITHIN 10 FEET OF TANK TO BE CLASS 1, DIV. 2, PER LOCAL CODE. SEE SITE UTILITY PLAN FOR ADDITIONAL SPECIFICATIONS.
  3. DO NOT INSTALL L. C. T. SENSING ELEMENT IN COUPLING IN CENTER OF TANK.
  4. THIS DRAWING IS SCHEMATIC AND SHOWS TYPICAL INSTALLATION DETAILS ONLY.
- PROPRIETARY STATEMENT**
- 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.

REVISIONS					
NO.	DESCRIPTION	BY	CHK	APPR	DATE

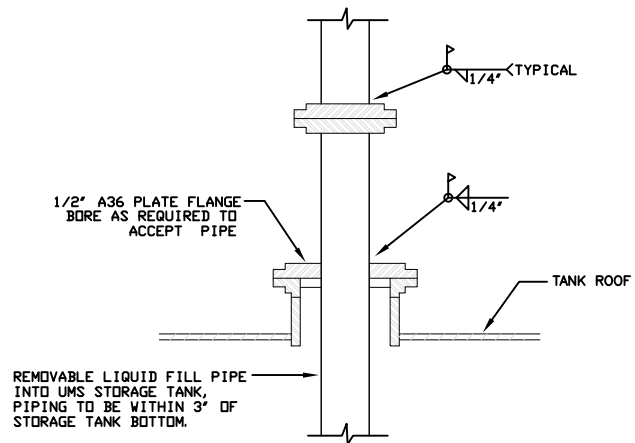
TITLE					
<b>WASTE MINERAL SPIRITS HLA SYSTEM DIAGRAM</b>					
<b>SAFETY-KLEEN SYSTEMS, INC.</b> 42 LONGWATER DR. NORWELL, MA. 02061 PHONE 800-669-5740					
SCALE	BY	CHKD	P.E. APPR	OP. APPR	DATE
NONE	QuesTec				4-28-92
SERVICE CENTER LOCATION			SC-DWG-REV NO.		SHEET NO.
TULSA, OK.			7105-9100-499		

Exhibit E-5

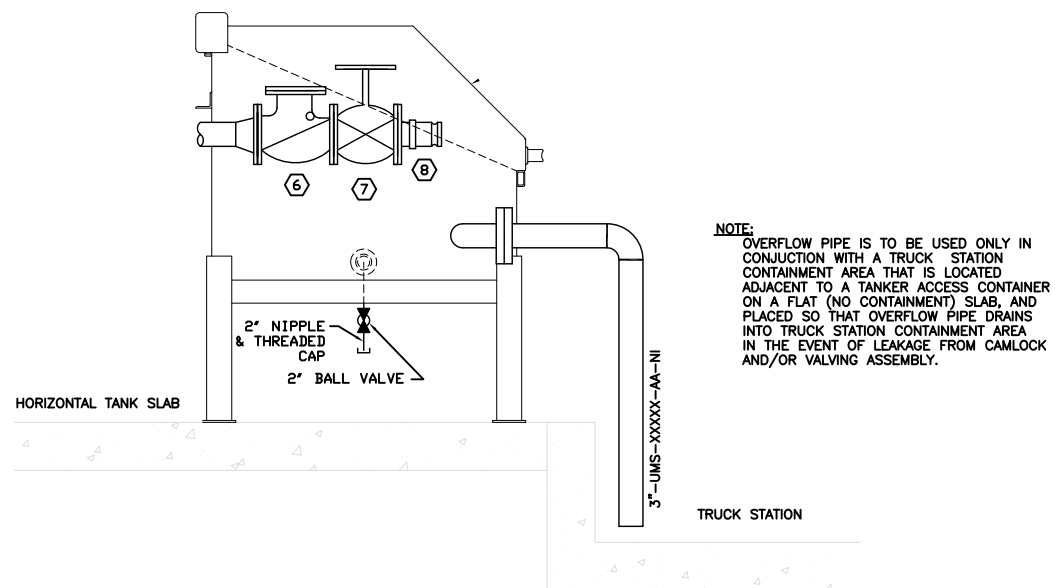
Spent Parts Washer Solvent 8,000 Gallon Horizontal Storage  
Tanks



12 ACCESS CONTAINER PLAN  
303 SCALE: NONE

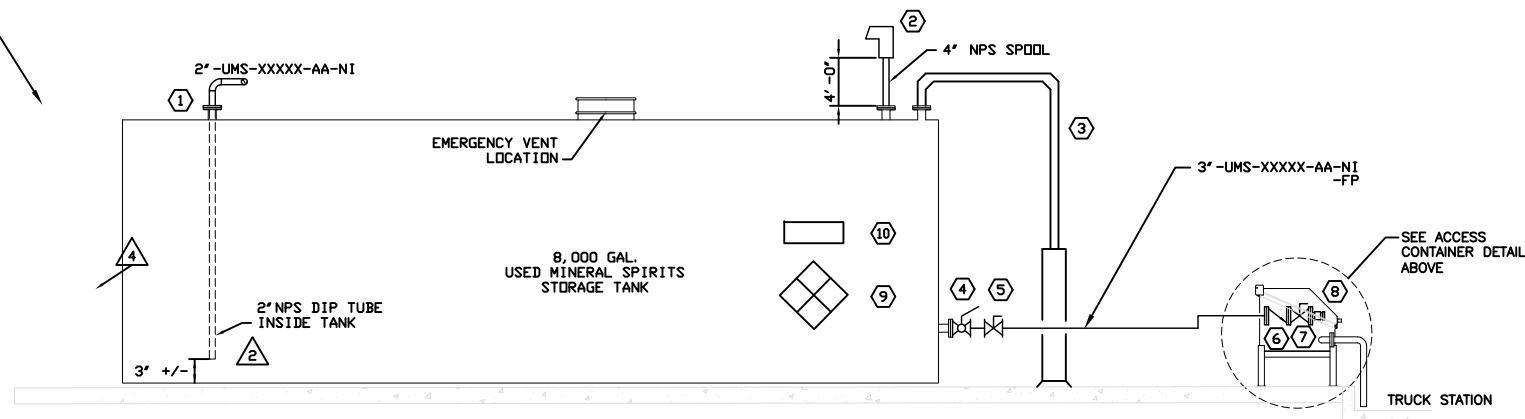


8 TANK DOME PIPING PENETRATION DETAIL  
303 SCALE: NONE



9 ACCESS CONTAINER DETAIL  
303 SCALE: NONE

SEE PIPE PENETRATION  
DETAIL 8 THIS SHEET



USED MINERAL SPIRITS TANK PIPING ELEVATION (ARED TANK)  
SCALE: 1/4" = 1'-0"

EQUIPMENT SCHEDULE

MARK	PART DESCRIPTION	MANUFACTURER MODEL NUMBER	REMARKS
①	3/8" VACUUM BREAKER	MORRISON 134-A	
②	3" SCREWED PRESSURE VAXCUUM VENT	MORRISON 548	SP= 2oz. PRESSURE, 1oz. VACUUM
③	TANKK LECVEL GAUGE	MORRISON 7-S	
④	3" INTERNAL EMERGENCY VENT	MORRISON 272 HD	
⑤	3" DUCTILE IRON GATE VALVE	MORRISON 235 DI	
⑥	3" CHECK VALVE	MORRISON 246 A	
⑦	3" GATE VALVE	MORRISON 235 B	
⑧	3" CAMLOCK W/CAP	MORRISON 735LAT	
⑨	NFPA MATERIAL I. D. PLACARD		DISPLAY IN PLAIN SIGHT ABOVE DIKE WALL
⑩	COMBUSTABLE KEEP AWAY SIGN		DISPLAY IN PLAIN SIGHT ABOVE DIKE WALL

GENERAL NOTES

- ACCESS CONTAINER FURNISHED BY OWNER. SEE DWG. BSD 910.
- SUPPORT LOWER END OF DIP TUBE FROM TANK FLOOR AS REQUIRED.
- SEE DWG. 4100-298 FOR ACTUAL LOCATION OF LEVEL GAUGE HEAD.
- UMS AND UOW PIPING TO BE HEAT TRACED AND INSULATED. SEE DWG. BSD 407, 408.
- PIPING TO CONFORM TO ASME B31.3, REFERENCE SAFETY-KLEEN CORP.'S PIPING SPECIFICATIONS.
- TANKS TO BE U.L. LISTED AND BE SO LABELED.

LEGEND

CMS = CLEAN MINERAL SPIRITS  
UMS = USED MINERAL SPIRITS  
UO = USED OIL  
UO/W = USED OIL/OILY WATER  
UA = USED ANTIFREEZE

☒ INDICATES CLOSED GATE VALVE

NOTE: THESE VALVES TO BE NORMALLY KEPT CLOSED UNLESS PROCESS IS IN OPERATION.

PROPRIETARY STATEMENT

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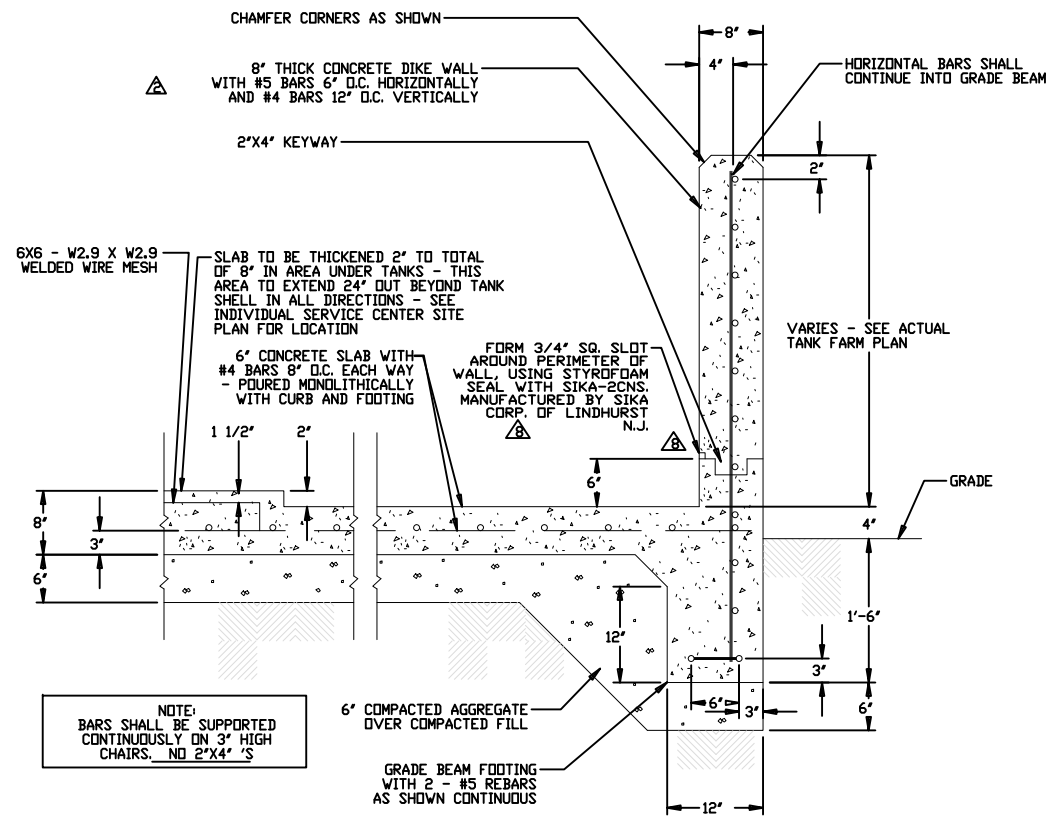
TITLE  
USED MINERAL SPIRITS  
HORIZONTAL TANK PIPING  
ELEVATIONS AND DETAILS

NO.	DESCRIPTION	BY	CHK	APPR	DATE	SCALE AS SHOWN	STANDARD TYPE	APPROVED	OPERATIONS	DATE	REV. NO.
B	REVISED FOR TULSA SITE	JEK	AG	AG	091311						
0	INCORPORATED REVIEW COMMENTS	RD	KJM		102193						
A	ISSUED FOR REVIEW	RD	KJM		062393						
REVISIONS											
MECHANICAL								BSD-303		B	

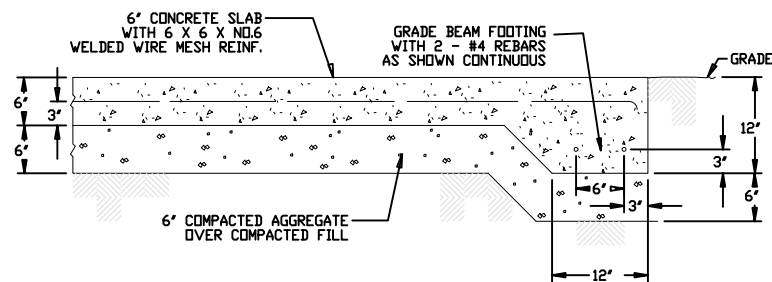
SAFETY-KLEEN SYSTEMS, INC.  
42 LONGWATER DR. NORWELL, MA. 02061  
PHONE 800-669-5740

## Exhibit E-6

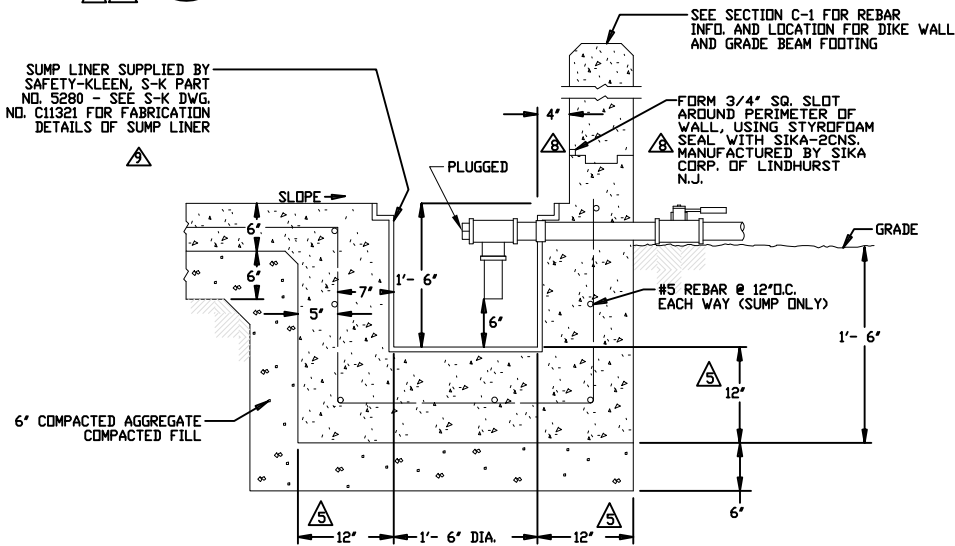
### Tank Farm Concrete Construction Details



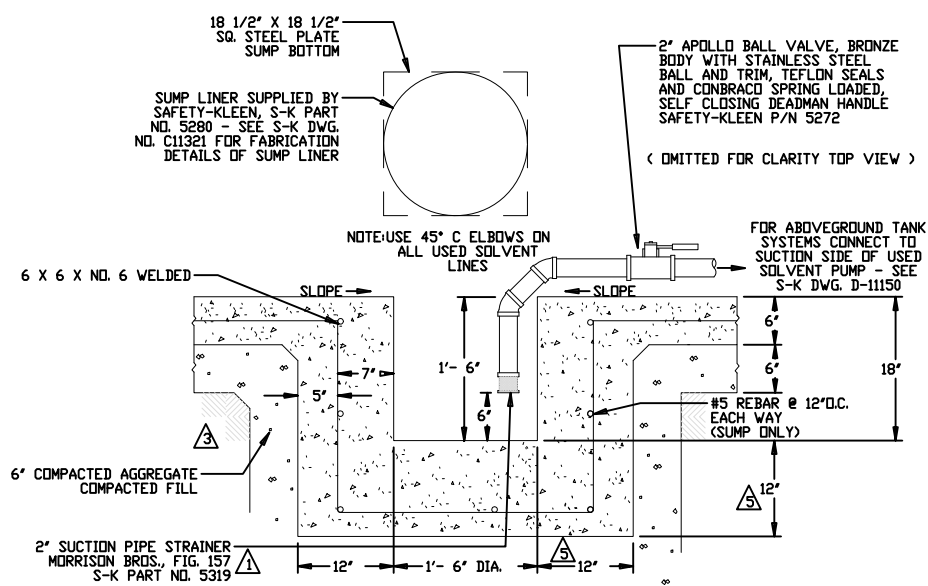
**C1** SECTION C-1: TANK SLAB & DIKE WALL  
SCALE: 1"=1'-0"



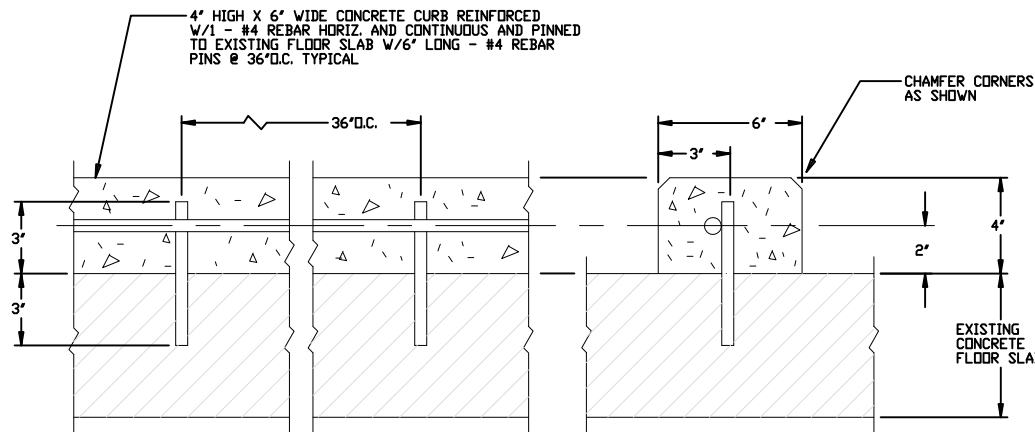
**C2** SECTION C-2: SLAB CONSTRUCTION DETAIL  
SCALE: 1"=1'-0"



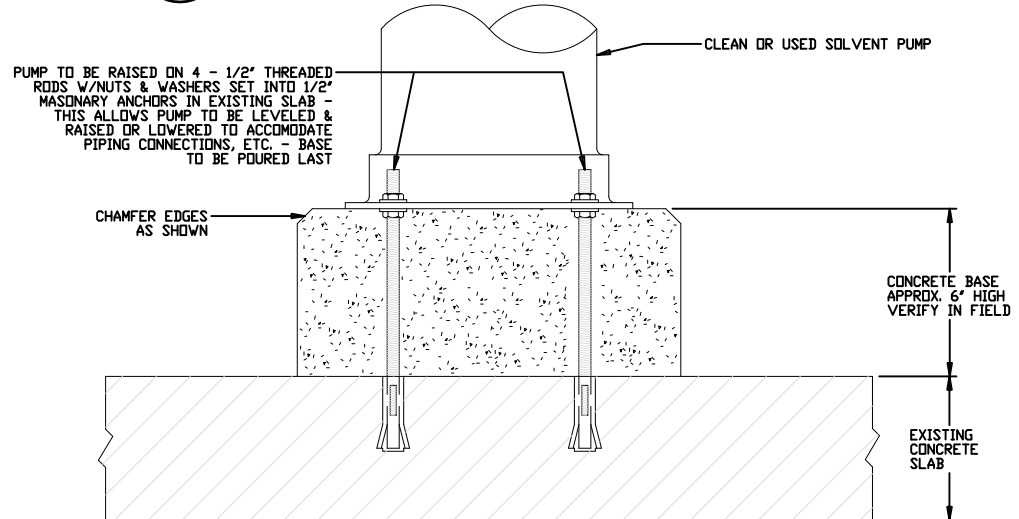
**C3** SECTION C-3: TANK FARM SUMP  
SCALE: 1"=1'-0"



**C4** SECTION C-4: RETURN & FILL AREA SUMP  
SCALE: 1"=1'-0"



**D1** DETAIL D-1: CURB CONSTRUCTION  
SCALE: 3"=1'-0"



**D2** DETAIL D-2: PUMP BASE CONSTRUCTION  
SCALE: 3"=1'-0"

**GENERAL NOTES**

- 1 THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORP. ANY REPRODUCTION OR DISCLOSURE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITING
- 2 THIS DRAWING SUPERCEDES SAFETY-KLEEN DRAWINGS C10240, C10962, D10507, AND D10955
- 3 SEE INDIVIDUAL SERVICE CENTER PLANS FOR LOCATIONS OF THESE DETAILS
- 4 CONCRETE TO OBTAIN 3,000 PSI STRENGTH IN 28 DAYS
- 5 ALL ITEMS WITH SAFETY-KLEEN PART NO. REFERENCES WILL BE SUPPLIED TO CONTRACTOR.
- 6 ALL CONCRETE WORK SHALL CONFORM TO THE REQUIREMENTS OF ACI-301-84 "SPECIFICATIONS FOR STRUCTURAL CONCRETE FOR BUILDINGS" ALL CONCRETE SHALL HAVE  $f_c=3,000$  PSI. ALL CONCRETE EXPOSED TO WEATHER SHALL HAVE 5-7% AIR ENTRAINMENT. COARSE AGGREGATE SHALL CONFORM TO NO. 57 IN ACCORDANCE WITH ASTM C-33.
- 7 ALL CONCRETE AREAS TO BE COVERED WITH BURLAP AND KEPT CONTINUOUSLY MOIST FOR A MINIMUM PERIOD OF THREE DAYS IMMEDIATELY AFTER PLACEMENT & FINISHING.
- 8 SLOPE ALL CONCRETE SLABS TO SUMP AS SHOWN ON PLAN.(RAISED SLAB UNDER TANKS TO BE LEVEL).
- 9 ALL FOOTINGS SHALL BEAR ON UNDISTURBED SOIL OR COMPACTED FILL. MINIMUM SOIL BEARING PRESSURE TO BE 2,500 PSF.
- 10 TOP OF ALL EXPOSED CONCRETE WALL POURS TO BE SCREENED AND FINISHED PERFECTLY LEVEL FOR PROPER ARCHITECTURAL APPEARANCE.
- 11 SUMPS TO BE TESTED BY CONTRACTOR WITH WATER AT FULL HEIGHT FOR A PERIOD OF 24 HOURS, WITH NO LEAKAGE ALLOWED.
- 12 ALL FLOORS AND SUMPS SHALL BE COATED WITH TWO COATS OF SIKAGARD 62, MANUFACTURED BY SIKA CORP. LYNDHURST,N.J. OR CONCRETE 1305, MANUFACTURED BY ADHESIVE ENGINEERING CO. SAN CARLOS,CA. COATING SHALL HAVE A SLIP-RESISTANT FINISH PER MANUFACTURER'S SPECIFICATIONS. MANUFACTURER'S RECOMMENDATIONS FOR SURFACE PREPARATION AND APPLICATION SHALL BE STRICTLY FOLLOWED. ALLOW CONCRETE SUBSTRATE TO CURE AT LEAST 30 DAYS PRIOR TO APPLICATION OF COATING.

**PROPRIETARY STATEMENT**

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NO.	DESCRIPTION	BY	CHKD	APPR	DATE
1	RMV.D. MESH FROM SECT. C3	RD			4/14/89
2	ADDED 3/4" SLOT & LABEL C-1 & C-3	BD			3/7/89
3	REVISED SECTION C-1	RD			7/6/88
4	ADDED COUPLING NOTE	RD			3/29/88
5	THICKENED CONC. IN SUMP SECT'S C-3 & C-4	RD			2/22/88
6	RMV'D 2" DRAIN LINE & BALL VALVE/S	RD			5/18/87
7	RMV'D UG. DRAIN LINE FROM SUMP DET. C-4	RD			8/6/86
8	VERT. BAR SPACING WAS 48"	WLJ			10/26/84
9	ADDED NOTE 5 & PIPE STRAINER	WLJ			10/23/84

REVISIONS						TULSA, OK.			
NO.	DESCRIPTION	BY	CHKD	APPR	DATE	SCALE	DRAWN	DATE	REV.
1	ADDED NOTES 6 THRU 12	RD			7/27/89	AS SHOWN	NWD-PBG	12/16/83	
2	REMOVED DRAIN PLUG(SHOWED CORRECTED VERSION OF SUMP GRATING SUPPORT	RD			6/20/89				

**SAFETY-KLEEN SYSTEMS, INC.**  
42 LONGWATER DR. NORWELL, MA. 02061  
PHONE 800-888-5740

TITLE: TYPICAL CONCRETE CONSTRUCTION DETAILS  
SCALE: AS SHOWN  
DRAWN: NWD-PBG  
DATE: 12/16/83  
REV.:

Exhibit E-7

Metal Flammable Shelter

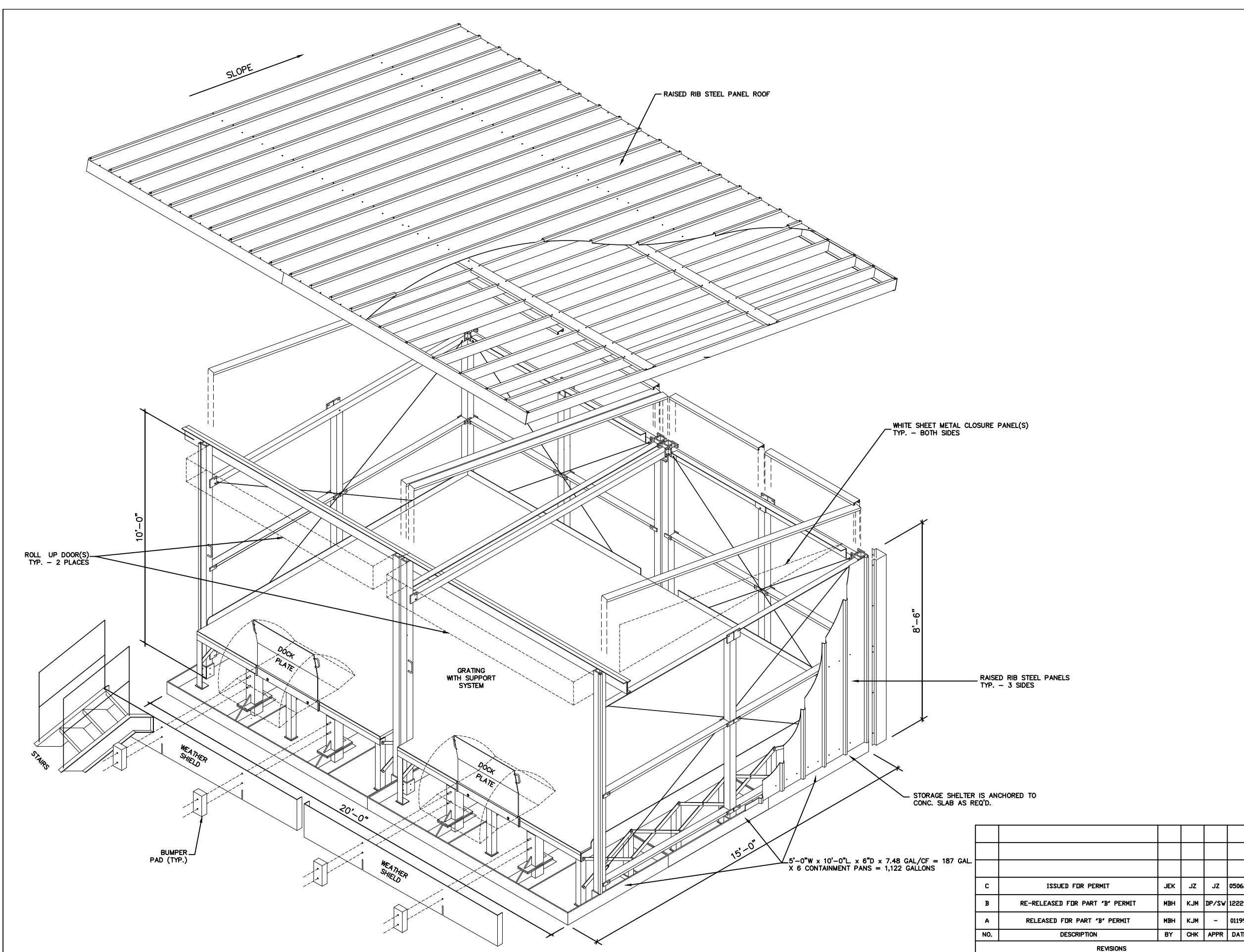


EXHIBIT E-7

GENERAL NOTES

1. ACTUAL FRAMING CONFIGURATION MAY VARY DUE TO MAINTENANCE/ UPKEEP OF FACILITY.

PROPRIETARY STATEMENT

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TITLE  
**CLASS 1B STORAGE BLDG.**  
**ISOMETRIC - EXISTING**

**SAFETY-KLEEN SYSTEMS, INC.**  
 42 LONGWATER DR. NORWELL, MA. 02061  
 PHONE 800-869-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
C	ISSUED FOR PERMIT	JEK	JZ	JZ	050624
B	RE-RELEASED FOR PART 'B' PERMIT	MBH	KJM	DP/SV	122294
A	RELEASED FOR PART 'B' PERMIT	MBH	KJM	-	011993
REVISIONS					

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1/2"=1'-0"	MBH	KJM	-	-	11-25-92
SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.			
TULSA, OK.	7105-7100-600	B			

Exhibit E-8  
Example Inspection Log Sheets



## 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



## 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



## 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, corrosions, proper operation, pathways clear, doors/gates operable.	
<b>Compliance Footer</b>	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



## 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 seams, 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)	
<b>Compliance Footer</b>	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



## 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).	
<b>Compliance Footer</b>	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



## 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 seams, 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)	
<b>Compliance Footer</b>	
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, corrosions, proper operation, pathways clear, doors/gates operable.	
<b>Compliance Footer</b>	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



## 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).	
<b>Compliance Footer</b>	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	

Exhibit E-9  
Tank Integrity Test

**Safety-Kleen Systems**

**Tulsa, OK**

**STI SP001 Formal Internal Inspection**

**T-2**

**Inspection Date: 6/24/2021**



Tank Data			
Design Standard:	No data Available	Nominal Diameter:	8' 0"
Build Date:	No data Available	Nominal Length:	21' 5"
Manufactured By:	No Data Available	Release Prevention Barrier:	Concrete
Manufacturer's Serial No.:	No Data Available	Head Type:	Flat
Material:	CS	Continuous Release Detection Method (CRDM):	Elevated
Orientation:	Horizontal	Spill Control:	Dike/Berm

SUMMARY
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**Conclusion:**

As determined by the condition found during the inspection of tank# T-2, the tank appears to be in suitable condition at the time of this inspection.

**Recommendations:**

The cracks in the containment should be cleaned and sealed.

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cracking
Containment / Dike walls	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cracking
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
Base Support Type					Skids
Coating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Concrete Pad	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>	
Lifting Lugs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Atmospheric Venting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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					
Heads		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 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"/>	
Proper Drainage	<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"/>	
Top Appurtenances		General Condition			
Items	Acc	Fin	N/I	N/A	Comments
Bolting Condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Condition of Hatch(s), Manway(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Condition of Pressure/Vacuum Vent(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Condition of Vent Screen(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Emergency Venting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mixer / Agitator	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Normal Venting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	
Gauges, Sight Glass (damage)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Grounding (tightness & corrosion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Liquid Level Gauge	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Data Plate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Attached Not Legible

INTERNAL VISUAL INSPECTION					
Shell		General Condition			
Item	Acc	Fin	N/I	N/A	Comments
Annular Ring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Cleanliness	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion/Pitting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Magnetic Flux Leakage Exam	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Repair(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sump(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Vacuum Box Bubble Exam	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Void(s), Low Spots	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Floor to Shell Weld (MP only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Heads		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 / Pitting	<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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Corrosion/Pitting	<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"/>	
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:**

	0°	90°	180°	270°
<b>First Course</b>	0.257"	0.243"	0.259"	0.262"
	0.253"	0.240"	0.258"	0.263"
	0.253"	0.244"	0.256"	0.260"
<b>Second Course</b>	0.245"	0.225"	0.250"	0.244"
	0.246"	0.230"	0.250"	0.247"
	0.248"	0.229"	0.249"	0.248"
<b>Third Course</b>	0.273"	0.269"	0.279"	0.276"
	0.278"	0.255"	0.278"	0.281"
	0.274"	0.268"	0.273"	0.275"

<b>Course 1</b>		<b>Course 2</b>	
Minimum	0.240"	Minimum	0.225"
Average	0.254"	Average	0.243"
Maximum	0.263"	Maximum	0.250"
Standard Deviation	0.008"	Standard Deviation	0.009"

<b>Course 3</b>	
Minimum	0.255"
Average	0.273"
Maximum	0.281"
Standard Deviation	0.007"

	<b>Top</b>	<b>Bottom</b>	<b>East</b>	<b>West</b>
<b>North Head</b>	0.261"	0.261"	0.264"	0.264"
<b>South Head</b>	0.259"	0.262"	0.264"	0.264"

	<b>12 o' clock</b>	<b>6 o' clock</b>
<b>Manway</b>	0.221"	0.228"

**Photographs**



**Photographs**



**Photographs**



**Inspection Certification Certificate**

Taylor Sudol (Certified Inspector) has performed a STI SP001 Formal Internal Inspection of Tank# 2. The tank is located at the Safety-Kleen facility in Tulsa, OK. As determined by the condition found during the inspection of tank# 1, the tank appears to be in suitable condition at the time of this inspection. Facility personnel should perform periodic inspections in accordance with STI SP001.

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 STI SP001 (current version), Clean Harbors' Written Practice and Inspection procedures.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment. My status as a Certified Inspector can be verified on the American Petroleum Institute and Steel Tank Institute websites at the below links.



Taylor Sudol

API 510# 61515

API 570# 71792

API 653# 56977

STI SP001# AC44096

Designated Corporate Level III

API: <http://inspectorsearch.api.org>

STI: <https://www.steeltank.com/SP001StandardFAQs/tabid/463/Default.aspx> Within Question #9

**WARRANTY**

Clean Harbors Inspection Services, USA. ("Company") has performed inspection services on equipment designated by Choose an item. (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.

**Safety-Kleen Systems**

**Tulsa, OK**

**STI SP001 Formal Internal Inspection**

**T-3**

**Inspection Date: 6/24/2021**



Tank Data			
Design Standard:	No data Available	Nominal Diameter:	8' 0"
Build Date:	No data Available	Nominal Length:	21' 5"
Manufactured By:	No Data Available	Release Prevention Barrier:	Concrete
Manufacturer's Serial No.:	No Data Available	Head Type:	Flat
Material:	CS	Continuous Release Detection Method (CRDM):	Elevated
Orientation:	Horizontal	Spill Control:	Dike/Berm

SUMMARY
---------

**Conclusion:**

**As determined by the condition found during the inspection of tank# T-3, the tank appears to be in suitable condition at the time of this inspection.**

**Recommendations:**

The cracks in the containment should be cleaned and sealed.

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cracking
Containment / Dike walls	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cracking
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
Base Support Type					Skids
Coating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Concrete Pad	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>	
Lifting Lugs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Atmospheric Venting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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					
Heads		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 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"/>	
Proper Drainage	<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"/>	
Top Appurtenances		General Condition			
Items	Acc	Fin	N/I	N/A	Comments
Bolting Condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Condition of Hatch(s), Manway(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Condition of Pressure/Vacuum Vent(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Condition of Vent Screen(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Emergency Venting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mixer / Agitator	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Normal Venting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	
Gauges, Sight Glass (damage)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Grounding (tightness & corrosion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Liquid Level Gauge	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Data Plate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Attached Not Legible

INTERNAL VISUAL INSPECTION					
Shell		General Condition			
Item	Acc	Fin	N/I	N/A	Comments
Annular Ring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Cleanliness	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Corrosion/Pitting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Magnetic Flux Leakage Exam	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Repair(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sump(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Vacuum Box Bubble Exam	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Void(s), Low Spots	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Floor to Shell Weld (MP only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Heads		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 / Pitting	<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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Corrosion/Pitting	<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"/>	
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:**

	0°	90°	180°	270°
<b>First Course</b>	0.261"	0.262"	0.260"	0.259"
	0.259"	0.266"	0.263"	0.259"
	0.259"	0.266"	0.263"	0.258"
<b>Second Course</b>	0.250"	0.253"	0.250"	0.254"
	0.252"	0.254"	0.252"	0.257"
	0.249"	0.255"	0.253"	0.252"
<b>Third Course</b>	0.261"	0.260"	0.257"	0.261"
	0.267"	0.262"	0.261"	0.263"
	0.264"	0.261"	0.257"	0.260"

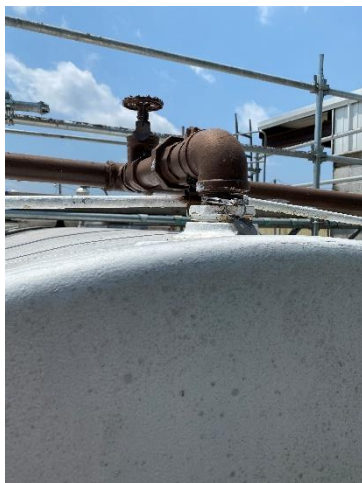
<b>Course 1</b>		<b>Course 2</b>	
Minimum	0.258"	Minimum	0.249"
Average	0.261"	Average	0.253"
Maximum	0.266"	Maximum	0.257"
Standard Deviation	0.003"	Standard Deviation	0.002"

<b>Course 3</b>	
Minimum	0.257"
Average	0.261"
Maximum	0.267"
Standard Deviation	0.003"

	<b>Top</b>	<b>Bottom</b>	<b>East</b>	<b>West</b>
<b>North Head</b>	0.257"	0.257"	0.258"	0.261"
<b>South Head</b>	0.259"	0.258"	0.256"	0.258"

	<b>12 o' clock</b>	<b>6 o' clock</b>
<b>Manway</b>	0.224"	0.234"

## Photographs



**Photographs**



## Photographs



**Inspection Certification Certificate**

Taylor Sudol (Certified Inspector) has performed a STI SP001 Formal Internal Inspection of Tank# 3. The tank is located at the Safety-Kleen facility in Tulsa, OK. As determined by the condition found during the inspection of tank# 3, the tank appears to be in suitable condition at the time of this inspection. Facility personnel should perform periodic inspections in accordance with STI SP001.

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 STI SP001 (current version), Clean Harbors' Written Practice and Inspection procedures.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment. My status as a Certified Inspector can be verified on the American Petroleum Institute and Steel Tank Institute websites at the below links.



Taylor Sudol

API 510# 61515

API 570# 71792

API 653# 56977

STI SP001# AC44096

Designated Corporate Level III

API: <http://inspectorsearch.api.org>

STI: <https://www.steeltank.com/SP001StandardFAQs/tabid/463/Default.aspx> Within Question #9

**WARRANTY**

Clean Harbors Inspection Services, USA. ("Company") has performed inspection services on equipment designated by Choose an item. (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.

Cameron-Cole LLC



**Integrity Assessment  
Used Solvent Storage System  
Tulsa, Oklahoma**

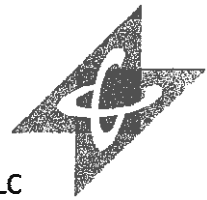
Prepared for:  
**Safety-Kleen Systems, Inc.**

Date: 11.19.2009

Cameron-Cole, LLC

5777 Central Avenue  
Suite 200  
Boulder, CO 80301  
P. 303.938.5500  
F. 303.938.5520

[www.cameron-cole.com](http://www.cameron-cole.com)



**TANK SYSTEM CERTIFICATION**

I have supervised the integrity assessment dated November 19, 2009, of the Used Solvent Storage Tank System at the Safety-Kleen Systems, Inc. facility in Tulsa, Oklahoma. The EPA ID Number for this facility is OKD 000763821. This work is described in the attached Cameron-Cole, LLC report *Integrity Assessment Used Solvent Storage System, Tulsa, Oklahoma, November 19, 2009*. The report was performed to meet the requirements of Resource Conservation and Recovery Act (RCRA) regulations in 40 CFR 264.191, 40 CFR 264.193, and the corresponding requirements in the Oklahoma Department of Environmental Quality regulations OAC 252:205-3-2.

With regard to the above duty, 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 assume that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of 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.

Wayne L. Frank  
Registered Professional Engineer  
Oklahoma PE Number 22414

Cameron-Cole, LLC  
5777 Central Ave.  
Suite 200  
Boulder, CO 80301





## TANK SYSTEM ASSESSMENT

This report documents the integrity assessment of the used solvent storage system at the Safety-Kleen Systems, Inc. facility in Tulsa, Oklahoma. The EPA ID number for this facility is OKD 000763821. This assessment and this report were prepared to meet the requirements of the Resource Conservation and Recovery Act (RCRA) regulations in 40 CFR 264.191, 40 CFR 264.193<sup>1</sup>, and the corresponding requirements in the Oklahoma Department of Environmental Quality regulations, OAC 252:205-3-2<sup>2</sup>. The tank thickness evaluation is based on guidance in Underwriters Laboratories document *UL 142 Steel Aboveground Tanks for Flammable and Combustible Liquids*.

## SYSTEM DISCRPTION

Used mineral spirits solvent material is poured from containers into one of two open-top, aboveground, steel solvent-return receptacles, which also serve as drum washers. The used solvent material is pumped from these receptacles through aboveground piping to two aboveground storage tanks that are manifolded together. Valves on the manifold piping are normally open, so that the liquid level in the two tanks equalizes. Used solvent is pumped into the west tank; liquid then gravity flows into the east tank via the normally-open manifold piping. Accumulated used solvent and sludge material is periodically removed from this used solvent storage tank for offsite recycling. Solvent is removed through a 2-inch drain pipe on each tank, performed by a tanker truck equipped with a suction pump through a 3-inch pipe that is connected to the drain pipe using an adapter. Sludge and solids are removed through manways on the tanks. No other equipment or standby equipment is used in the operation of the aboveground tank.

The used solvent storage tanks are each 8,000-gallon horizontal welded steel cylinders, with reinforced flat heads, supported by steel skids on a reinforced concrete slab-on-grade. Both tanks are vented through a conservation breather vent to prevent over-pressuring. A high-level alarm is used to prevent overfilling the tanks. The liquid level in the east tank is monitored with a level indicator and recorded once daily. Since the tanks are manifolded together, the liquid level in the east and west tanks is the same. The tanks are located within a concrete

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<sup>1</sup> Part 264—Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities; Subpart J—Tank Systems: § 264.191 Assessment of existing tank system's integrity. §264.193 Containment and detection of releases.

<sup>2</sup> Department of Environmental Quality; Hazardous Waste Management; Incorporation by reference [40 CFR 271.14 ] Requirements for Permitting



containment vault. The drum washers and pump (with in-line filter) are located within a curbed concrete containment "return and fill" area.

For the purpose of this assessment, the tank system has been defined to include the drum washers, the storage tanks, the pump and filter, the aboveground piping system that connects them, and associated secondary containment areas. Appendix A includes drawings for the system schematic process flow, facility layout, storage tank design, and drum washer design.

## **Hazardous Characteristics of the Waste**

The used solvent material collected and stored by this system is a mixture of used solvent and sludge materials. The primary expected hazardous characteristics of the waste is ignitability, EPA hazard code I, and toxicity characteristics, EPA hazard code E. Refer to Appendix A for Material Safety Data Sheet (MSDS) of the primary components that comprise the used solvent mix stored in the system.

## **Corrosion Protection and Materials Compatibility**

The used solvent system components are all located either in a building or in an aboveground reinforced-concrete vault area, and are not in contact with soil or groundwater. Accordingly, corrosion-resistant materials of construction with cathodic protection or electrical isolation devices are not required. The exterior of the tanks, piping, and other system components are protected from the atmospheric corrosion by paint. The tanks, piping, valves, and other ancillary equipment are all made from carbon steel or brass; diaphragms and liquid interface devices are made from neoprene or tetrafluoroethylene (TFE) materials. Prior experience with the system indicates the waste is compatible with carbon steel, brass, and the neoprene or TFE materials. These materials of construction should provide satisfactory protection from corrosion and adequate service life under the intended service conditions.

## **INTEGRITY ASSESSMENT**

An integrity assessment was performed to detect leaks, cracks, corrosion, erosion or other deterioration of the system. The secondary containment areas were also checked. Documentation of the inspection and testing is in Appendix B.



For this assessment, visual inspection, ultrasonic thickness measurements, and hydrostatic leak tests were used on the drum washers, tanks, and ancillary equipment. Visual inspection was conducted at the secondary containment areas.

The hydrostatic test on the system was accomplished by filling the used solvent tanks to approximately 90% of their maximum operating capacity and filling the drum washers to their capacity with used solvent. The tank was inspected for a period of approximately one and a half hours. The total system was inspected for a period of approximately two and a half hours under normal operating conditions. After these inspections, the solvent was pumped to the tanks to test the pump, filter, and piping for leaks under operating conditions.

The inspection and hydrostatic leak tests revealed no visible evidence of current cracks or leaks in the system, but found that the paint on the bottom of the tank was flaking and deteriorating.

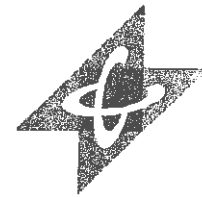
Ultrasonic thickness measurements were obtained to document the current thickness of the tanks' shell and ends. Measurements were made with a Cygnus I intrinsically safe digital ultrasonic thickness meter. The meter was calibrated before arrival on site and field verified with a 0.500-inch thick piece of steel (provided by the instrument vendor for this use) to ensure the meter was still in calibration<sup>3</sup>. Underwriters Laboratories (UL) 142 was used as a guideline to evaluate tank-shell thickness. Table 13.1 of UL 142 provides for the minimum carbon steel shell thicknesses for new horizontal tanks.

<b>WATER CAPACITY (GALLONS)</b>	<b>MAXIMUM DIAMETER (FEET)</b>	<b>MINIMUM METAL THICKNESS (INCHES)</b>
1,056 TO 9,000	6.3	0.167
9,000 TO 35,000	12	0.240

The two storage tanks have a capacity of 8,000 gallons with a diameter of 8 feet. The stored material is used solvent with a specific gravity of approximately 0.8 to 0.9, relative to the specific gravity of 1.0 for water. Consequently, it appears that the UL recommendation for new tanks would provide a shell thickness in the range between 0.167 and 0.240 inches.

Documentation in Appendix B shows the locations where measurements were made and presents the results of the external thickness measurements. These measurements were made through existing paint. In locations where the paint was chipping or peeling, the paint was scraped off to provide a surface with consistent coverage. The Cygnus I ultrasonic thickness

<sup>3</sup> The Cygnus 1 meter is designed to provide accuracy and resolution to 0.05 millimeters (0.002 inches). On-site calibration verification of the 0.500-inch steel plate read 0.500 inches.



meter uses an internal algorithm to distinguish paint from steel, and only reports the steel thickness. Thickness results are summarized in the following table.

	SHELL THICKNESS (INCHES)		END THICKNESS (INCHES)	
	MINIMUM	MAXIMUM	MINIMUM	MAXIMUM
EAST TANK	0.218	0.284	0.250	0.268
WEST TANK	0.245	0.266	0.250	0.262

These results suggest minor corrosion, particularly on the East tank shell.

Differences between any two data sets can be affected by manufacturer's material tolerances, different probe placement and nominal variations due to different instruments used, ambient temperature, and other variables inherent to the ultrasonic technology. These conditions should be considered when comparing current readings to readings taken during previous inspections.

## CONCLUSIONS

The used solvent tank system at the Safety-Kleen Systems, Inc. facility in Tulsa, Oklahoma was inspected on November 2, 2009. External visual inspections were supplemented by hydrostatic leak test and by ultrasonic thickness measurements to evaluate the condition of the storage system.

System components, including the tanks, drum washers, pump and associated piping, and secondary containment areas, are free from cracks, leaks, or significant corrosion or other performance-related defects. No leaks or cracks were observed in the hydrostatic operating testing of the used solvent tank or any of the system components.

Tank shell and end thickness values are well within an acceptable range, based on the suggested new-tank thickness provided in UL 142 table 13.1. The two horizontal tanks inspected as part of this used solvent storage system assessment are greater than five years old. These tanks will continue to be inspected every five years while in use, in accordance with the facility's RCRA permit.

APPENDIX F  
EMERGENCY INFORMATION

## Exhibit F-1

### Example Emergency Information Sheet

**EMERGENCY INFORMATION**  
**16319 E. MARSHALL**  
**TULSA, OK. 74116**  
**(918) 234-5185**

**FACILITY EMERGENCY COORDINATORS**

Boz Cannon (Primary) Branch, General Manager	18701 E 42 <sup>nd</sup> Place Tulsa, OK 74134	Work Cell: (918) 240-8628 Office Phone: (918) 234-5191
Billy Stopp (Secondary) Manager, Customer Service	1589 E 60 <sup>th</sup> Place Tulsa, OK 74105	Work Cell: (918) 370-1366 Office Phone: (918) 234-5191

**FACILITY NOTIFICATION NUMBERS**

**INTERNAL:**

Safety-Kleen Incident 24-Hour Notification System	24-Hour	(800) 468-1760
---	---------	----------------

**EXTERNAL:**

National Response Center	24-Hour	(800) 424-8802
Oklahoma Department of Environmental Quality	24-Hour	(800) 522-0206
Qualified Emergency Responder	24-Hour	(800) 468-1760

**TULSA, OK EMERGENCY TEAMS**

Catoosa Police Department	911
Catoosa Fire Department	911 or (918) 596-9977
Saint Francis Hospital	911
Emergency Medical Services	911

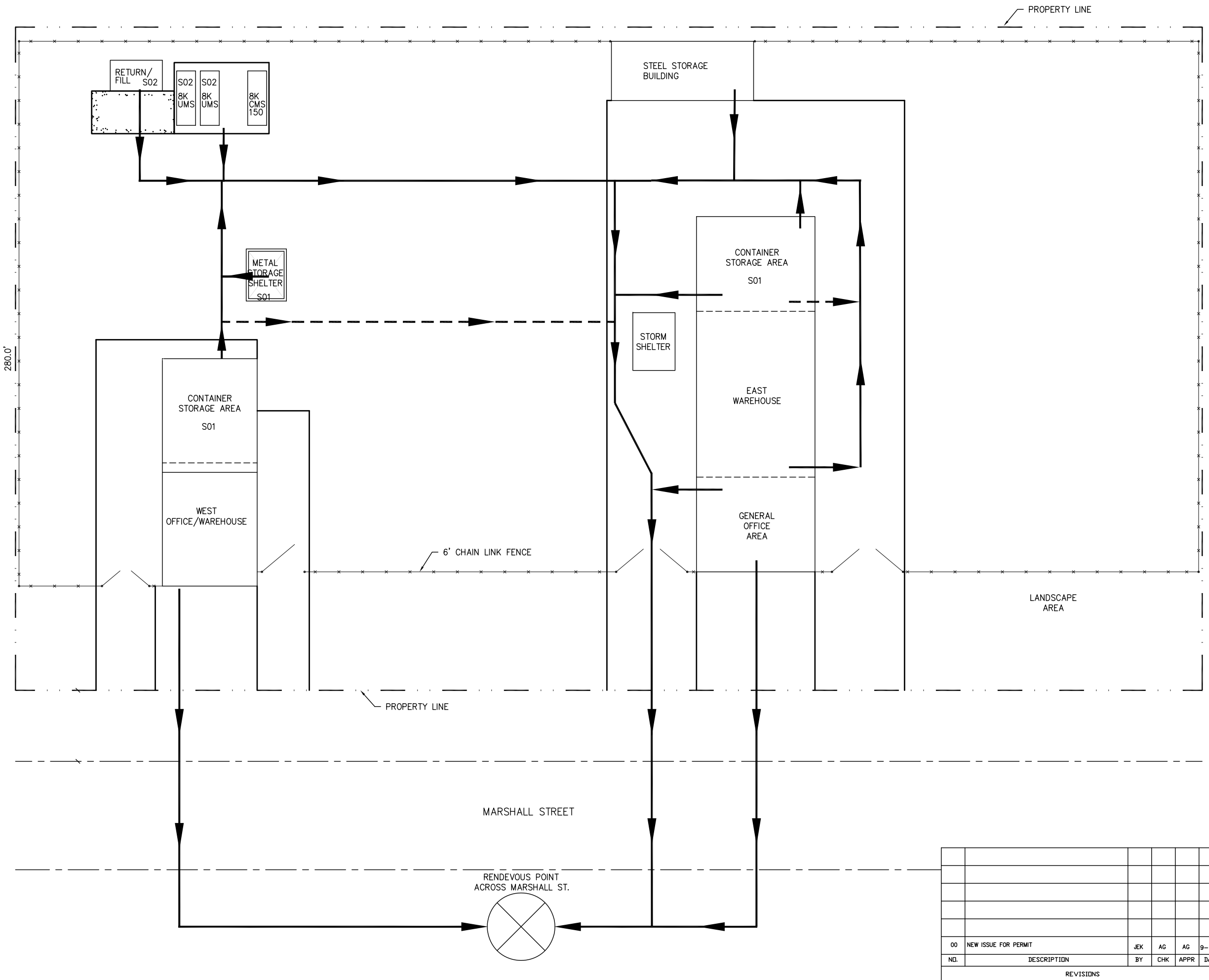
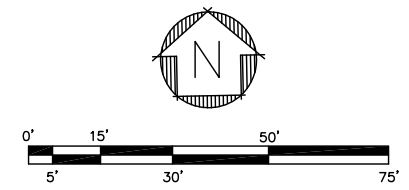
## Exhibit F-2

### Example Employee Emergency Functions

## EMPLOYEE EMERGENCY FUNCTIONS

TITLE	EMERGENCY FUNCTION
Emergency Coordinator	<ul style="list-style-type: none"><li>- Notify EHS Department</li><li>- Apply first aid</li><li>- Notify emergency agencies</li><li>- Shut off electricity</li></ul>
Alternate Emergency Coordinator	<ul style="list-style-type: none"><li>- Function as Emergency Coordinator</li></ul> <p style="text-align: center;">OR</p> <ul style="list-style-type: none"><li>- Supervise evacuation</li></ul>
Branch Administrator	<ul style="list-style-type: none"><li>- Supervise evacuation</li></ul>
Customer Service Manager/Dispatcher	<ul style="list-style-type: none"><li>- Retain, contain or slow the flow of solvent</li></ul>
Sales Representative	<ul style="list-style-type: none"><li>- Retain, contain or slow the flow of solvent</li></ul>
Material Handler	<ul style="list-style-type: none"><li>- Retain, contain or slow the flow of solvent</li></ul>

Exhibit F-3  
Site Evacuation Plan



LEGEND:  
 ———▶ PRIMARY EVAC ROUTE  
 - - - -▶ ALTERNATE EVAC ROUTE

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TITLE  
 SITE EMERGENCY EVACUATION PLAN

**SAFETY-KLEEN SYSTEMS, INC.**  
 42 LONGWATER DR. NORWELL, MA. 02061  
 PHONE 800-669-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
00	NEW ISSUE FOR PERMIT	JEK	AG	AG	9-13-11
REVISIONS					

SCALE	BY	CHKD	P.E. APPR	DP. APPR	DATE
1" = 20'-0"	JEK	AG	AG	AG	9/12/11
SERVICE CENTER BRANCH AT TULSA, OKLAHOMA					STD-DWG-REV NO. 7105-SP00-004

Exhibit F-4

Leak Detection and Repair Record



## Exhibit F-5

### Emergency Equipment List – Capabilities

### F-5 Emergency Equipment List - Capabilities

<b>Equipment</b>	<b>Location</b>	<b>Description</b>	<b>Capabilities</b>
Gloves	Warehouse	Neoprene, Latex & Leather	Provide hand protection from cuts, splashes and exposure to contaminants
Safety Glasses	Warehouse	Glasses, goggles, face masks	Eye and splash protection
Aprons	Warehouse	Front coverage aprons	Prevent splashes to clothing
Eyewash/Shower Combo Eyewash	Areas with potential contamination to eyes ( warehouse, return and fill)	Hard plumbed unit Portable unit Bottled eye wash	Purges contaminants from eyes and body
Fire Extinguisher	Office areas, warehouses, return and fill, flam shed, tank farm, all trucks	10 & 20 lb units	ABC rated for wood, paper, electrical and solvent fires.
Absorbent & Spill Dry Material	Warehouse, tank farm, route trucks	Booms, pads, granular absorbent, vermiculite	Capable of absorbing liquid spills of aqueous & petroleum type spills
Respirators	Issued to individual employees	Half face or full face	Protection from exposure to organic solvents, acids gases and ammonia
Telephones	Warehouse and office	Standard office phone & company-supplied cell phones	Allows employees to summon outside assistance in case of emergency
Emergency Alarm	Return and Fill	Red push button alarm on dock	Alarm emits a loud siren, audible to surrounding area and inside office, to notify of a problem in the return and fill.
Brooms, Buckets, Mops, Portable Pump and Wet/Dry Vacuum	Warehouse		Used to contain and pick-up spills.
First Aid Kits	Warehouse All trucks		Provide medical care for minor injuries

## Exhibit F-6

### Site Emergency Equipment Locations

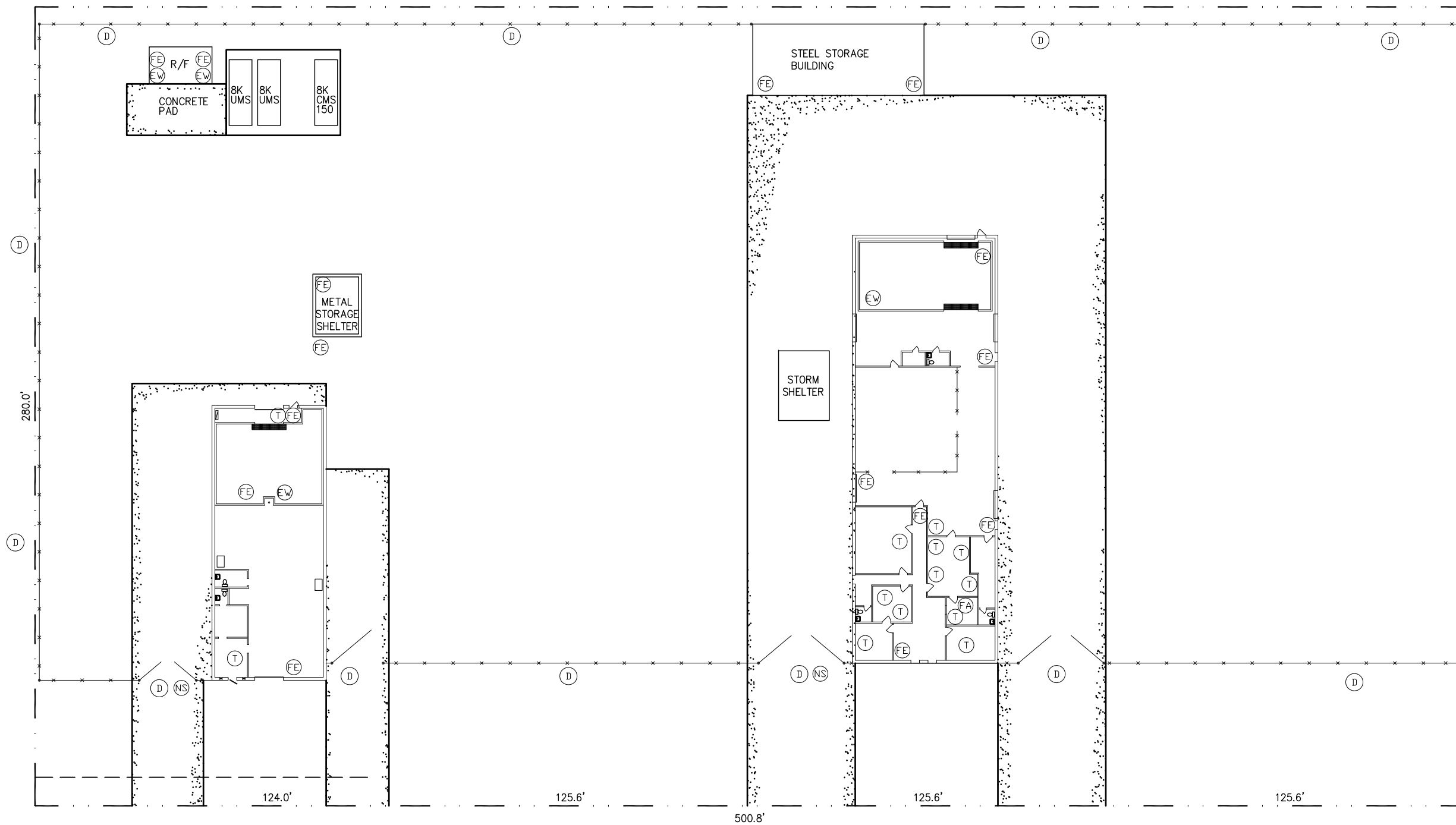
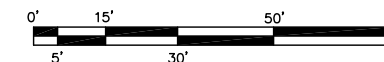


EXHIBIT F-6

LEGEND

- EYE WASH
- TELEPHONE
- FIRE EXTINGUISHER (TYPICAL 10# ABC)
- FIRST AID STATION
- "DANGER" SIGN
- "NO SMOKING" SIGN
- FIRE HYDRANT

PROPRIETARY STATEMENT

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MARSHALL STREET

TITLE  
SITE EMERGENCY  
EQUIPMENT LOCATIONS

SAFETY-KLEEN SYSTEMS, INC.  
42 LONGWATER DR. NORWELL, MA 02061  
PHONE: 800-669-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	ISSUED FOR PERMIT	JEK	JZ	JZ	050624
00	ISSUED FOR 2011 PERMIT	JEK	AG	AG	022312
REVISIONS					

SCALE	BY	CHKD	P.E. APPR	DP. APPR	DATE
1" = 20'-0"	JEK	AG	AG	AG	2/23/12
SERVICE CENTER BRANCH AT TULSA, OKLAHOMA				STD-DWG-REV NO. 7105-SPO0-003	

## Exhibit F-7

# Contingency Plan Quick Reference Guide

## CONTINGENCY PLAN QUICK REFERENCE GUIDE

Safety-Kleen Systems, Inc.  
 16319 E. Marshall St  
 Tulsa, OK  
 Office: (918) 234-5191  
 OKD000763821

### Facility Contacts:

Primary Emergency Coordinator	Boz Cannon	Mobile Phone (24/7)	(918) 240-8628
Alternate Emergency Coordinator	Billy Stopp	Mobile Phone (24/7)	(918) 370-1366

Note: This facility typically operates weekdays 7:00 AM – 5:00 PM

### Hazardous Waste Information:

Name of Waste	Waste Codes/Hazards	Location Accumulated	Maximum Amount Present	Response Notes	Special Notes to Hospital/Treatment Personnel
Parts Washer Solvent 150 Bulked	D001, (Ignitability; flash point <140°F) D039 (Toxic, ppm levels) and Potentially D-Codes Listed in Note Below	Above Ground Storage Tank in Containment	15,000 Gallons	Media to use includes regular dry chemical, foam, water spray, and water fog. Combustible liquid and vapor. The vapor is heavier than air. Decomposition and combustion materials may be toxic. Burning may produce carbon monoxide and other organic compounds. Wear full protective firefighting gear including SCBA. Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tanks due to fire. Stay away from the ends of tanks. For tank, rail car or tank truck, evacuation radius: 800 meters (1/2 mile). Stay upwind and keep out of low areas. Spills: Use foam on spills to minimize vapors. Keep out of water supplies and sewers. Absorb with earth, sand or other	Acute: May be fatal if swallowed and enters airways. May cause drowsiness or dizziness. Delayed: May cause damage to central nervous system. Special treatment Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident. Call 1-800-468-1760 for additional information.

				noncombustible material and transfer to container. Use non-sparking tools. Large spills: Reduce vapors with water spray. Dike for later disposal.	
Parts Washer Solvent 150	D039 (Toxic) and Potentially D-Codes Listed in Note Below	Return and Fill Area	Varies – Waste received from offsite generators	Media to use includes Class B/C or Class A/B/C fire extinguisher, carbon dioxide, regular dry chemical, foam, water spray, and water fog. Combustible liquid and vapor. The vapor is heavier than air. Decomposition and combustion materials may be toxic. Burning may produce carbon monoxide and other organic compounds. Wear full protective firefighting gear including SCBA. Move container from fire area if it can be done without risk. Cool containers with water spray until well after the fire is out. Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible withdraw from area and let fire burn. Stay upwind and keep out of low areas. Spills: Use foam on spills to minimize vapors. Keep out of water supplies and sewers. Absorb with earth, sand or other noncombustible material and transfer to container. Use non-sparking tools.	Acute: May be fatal if swallowed and enters airways. May cause drowsiness or dizziness. Delayed: May cause damage to central nervous system. Special treatment Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident. Call 1-800-468-1760 for additional information.
Parts Washer Bottom Sludge	D001, (Ignitability; flash point <140°F) D039 (Toxic) and Potentially D-Codes Listed in Note Below	Return and Fill Area or Warehouse	Typically < 4 55-gallon drums	See above	Acute: May be fatal if swallowed and enters airways. May cause drowsiness or dizziness. Delayed: May cause damage to central nervous system. Special treatment Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident. Call 1-800-468-1760 for additional information.
Aqueous Parts Washer Solutions	Typically non-regulated, but may occasionally carry D-Codes Listed in Note Below	Warehouse or Lot	Varies – Drums of waste received from offsite generators	Fire extinguisher media should be based on surrounding materials. Negligible fire hazard. Burning may produce oxides of carbon. Use water spray to keep fire-exposed materials cool.	Acute: May cause skin irritation. May cause eye irritation. May cause respiratory irritation. Delayed: Repeated exposure may cause skin dryness or cracking. Treat symptomatically and supportively.

Immersion Cleaner	D039 and Potentially D-Codes Listed in Note Below	Warehouse	Varies – Drums of waste received from offsite generators	<p>Fire: Use Carbon dioxide, alcohol-resistant foam, dry chemical, water spray, water fog. Combustible liquid. The vapor is heavier than air. Vapors or gases may ignite at distant ignition sources and flash back. Heated containers may rupture or be thrown into the air. Decomposition and combustion materials may be toxic. Burning may produce nitrogen oxides, acid halides, carbon monoxide, and unidentified organic compounds. Move container from fire area if it can be done without risk. Cool containers with water spray until well after the fire is out. Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible withdraw from area and let fire burn. Stay upwind and keep out of low areas. Dike for later disposal. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies. Spills: Contain spill away from surface water and sewers. Sorb with compatible sorbent material and shovel with a clean, spark proof tool into a sealable container for disposal.</p>	<p>Acute: Fatal if inhaled, eye, skin, liver, nervous and respiratory system, spleen, and testes damage, blood system disorders, respiratory tract irritation, skin and respiratory sensitizer, aspiration hazard. Delayed: Cancer, reproductive effects, skin and respiratory sensitizer. Special treatment: Treat symptomatically and supportively. Call 1-800-468-1760 for additional information.</p>
Dry Cleaning Waste (Perchloroethylene)	F002, D039 and Potentially D-Codes Listed in Note Below	Warehouse	Typically < 4 30-gallon drums	<p>Fire: Product itself does not burn, but may decompose upon heating to produce phosgene, halogenated compounds, hydrogen chloride gas, carbon monoxide, and unidentified organic compounds. A positive-pressure, SCBA and full-body protective equipment are required for fire emergencies. Move container from fire area if it can be done without risk. Cool containers with water spray until well after the fire is out. Vapors will spread along the ground and collect in low or confined areas. Spills: Sorb with compatible sorbent material shovel into a sealable container for disposal.</p>	<p>Acute: Causes skin irritation, eye irritation, central nervous system damage, liver damage, and respiratory system damage. May cause central nervous system depression. Delayed: Causes liver damage, nervous system damage, and respiratory system damage. May cause mutagenic effects, cancer, reproductive effects, and kidney damage. Special Treatment: Treat symptomatically and supportively. Do not administer Adrenaline (epinephrine) or similar drugs following product overexposure. Increased sensitivity of the heart to such drugs may be caused by overexposure to product. Administration of gastric lavage and/or activated charcoal slurry may be considered. Treatment may vary with condition of victim and specifics of incident.</p>

Paint Waste	D001 (Ignitability; flash point <140°F), F003, F005 (Methyl Ethyl Ketones, Acetone, MIBK), Toxicity	Warehouse or Flam Shed	Varies – Drums of waste received from offsite generators	Fire: Use Carbon dioxide, alcohol-resistant foam, dry chemical, water spray, water fog. Combustible liquid. If contact occurs, remove contaminated clothing & wash before reuse. If contact with skin, flush with soap and water. Get medical attention if irritation develops. If contact with eyes, flush with water-see medical attention. If inhaled, move to fresh air and keep at rest-see medical attention. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies. Spills: Contain spill away from surface water and sewers. Sorb with compatible sorbent material and shovel with a clean, spark proof tool into a sealable container for disposal.	If ingested, do not induce vomiting. If vomiting occurs, keep head lower than hips to prevent aspiration.
Various Other Hazardous Wastes Received from Offsite Generators	D001 (Ignitability; flash point <140°F), D002 (Corrosives) Various Toxics  Varies – Wastes Received from Offsite Generators	Warehouse	Varies – Drums of waste received from offsite generators	If contact occurs, remove contaminated clothing & wash before reuse. If contact with skin, flush with soap and water. Get medical attention if irritation develops. If contact with eyes, flush with water-see medical attention. If inhaled, move to fresh air and keep at rest-see medical attention.	If ingested, do not induce vomiting. If vomiting occurs, keep head lower than hips to prevent aspiration.

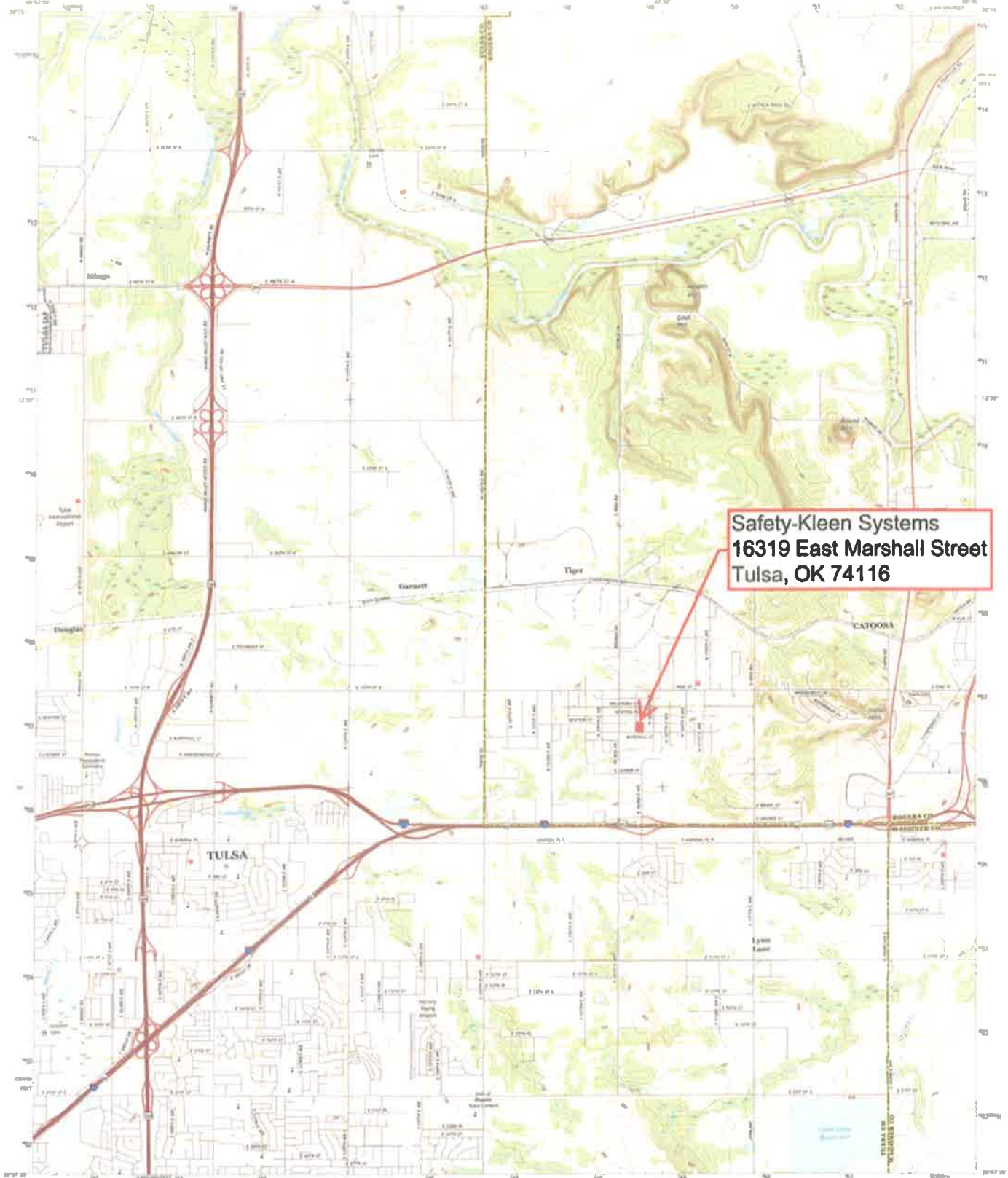
**NOTES:** D-Codes: **Container Storage** – D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D038, D039, D040, D041, D042, and D043  
**Tank Storage** – Dirty Solvent D001 D018 D039 D040



U.S. DEPARTMENT OF THE INTERIOR  
U.S. GEOLOGICAL SURVEY



MINCO QUADRANGLE  
OKLAHOMA  
7.5-MINUTE SERIES



**Safety-Kleen Systems**  
**16319 East Marshall Street**  
**Tulsa, OK 74116**

Produced by the United States Geological Survey  
Main projection datum of 1983 (NAD83)  
Map coordinate system of 1983 (NAD83) - Projection and  
1:250,000 scale (plus additional information, June 1983)  
1:250,000 scale - National Coordinate System of 1983 (NAD83)  
This map is not a legal document. It is provided for informational purposes only. The user assumes all liability for any use of this map. Please refer to the government  
agencies for more information. These agencies have  
primary jurisdiction.

Map:  
Scale: 1:250,000  
Date: August 2010  
Author: S. S. Carter, S. S. Carter  
Editor: S. S. Carter, S. S. Carter  
Cartographer: S. S. Carter, S. S. Carter  
Country: United States  
Coordinates: 36° 00' 00" N, 96° 00' 00" W  
Metadata: 1:250,000 National Coordinate System (NAD83)



CONTOUR INTERVAL: 10 FEET  
MAPS AND/OR INFORMATION: 10000 10000  
This map was produced in accordance with the  
National Geographic Program of Topographic Maps, 2010  
A complete list of maps can be found at [www.usgs.gov](http://www.usgs.gov)

**ROAD CLASSIFICATION**

Expressway	Local Expressway
Secondary Hwy	Local Road
Highway	Other
Interstate Road	State Road
	State Spur

**Other Symbols**

- 1: Airport
- 2: Cemetery
- 3: Dam
- 4: Dike
- 5: Embankment
- 6: Filling
- 7: Pipeline
- 8: Railway
- 9: Trench
- 10: Well
- 11: Water
- 12: Water Tower



MINCO, OK  
2010

## SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN SITE MAP

**Safety-Kleen**  
 16319 East Marshall Road  
 Tulsa, OK 74116



### MAP LEGEND

#### DRAINAGE FEATURES & TRANSFER AREAS

- Oil Transfer Area
- Direction of Flow
- X Floor Drain to 330-gallon Pit

#### OIL STORAGE INVENTORY

- 1: 2 X 7,800-Gallon Waste Solvent AST and 7,800-Gallon Clean Solvent AST
- 2: 2 X 300-Gallon Engine Oil Tote
- 3: 7 X 250-Gallon Miscellaneous Liquid Waste
- 4: 96 X 55-Gallon Miscellaneous Lubricants and Engine Oil

#### SECONDARY CONTAINMENT

- Concrete Berm
- Spill Kit

Latitude: 36°10'22" N  
 Longitude: 95°47'40" W

June  
 2019



# Tulsa



-  Hazardous Waste Storage
-  Dirty Solvent Storage
-  Aqueous Tote Storage
-  Return & Fill Area

# Tulsa

FIRE HYDRANT  
FLOW < 1500 GPM

SITE BOUNDARY



↑ Emergency Exit

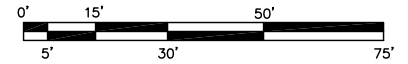
✘ Fire Extinguisher

□ Rally Point

✘ Fire Hydrant

GENERAL NOTES

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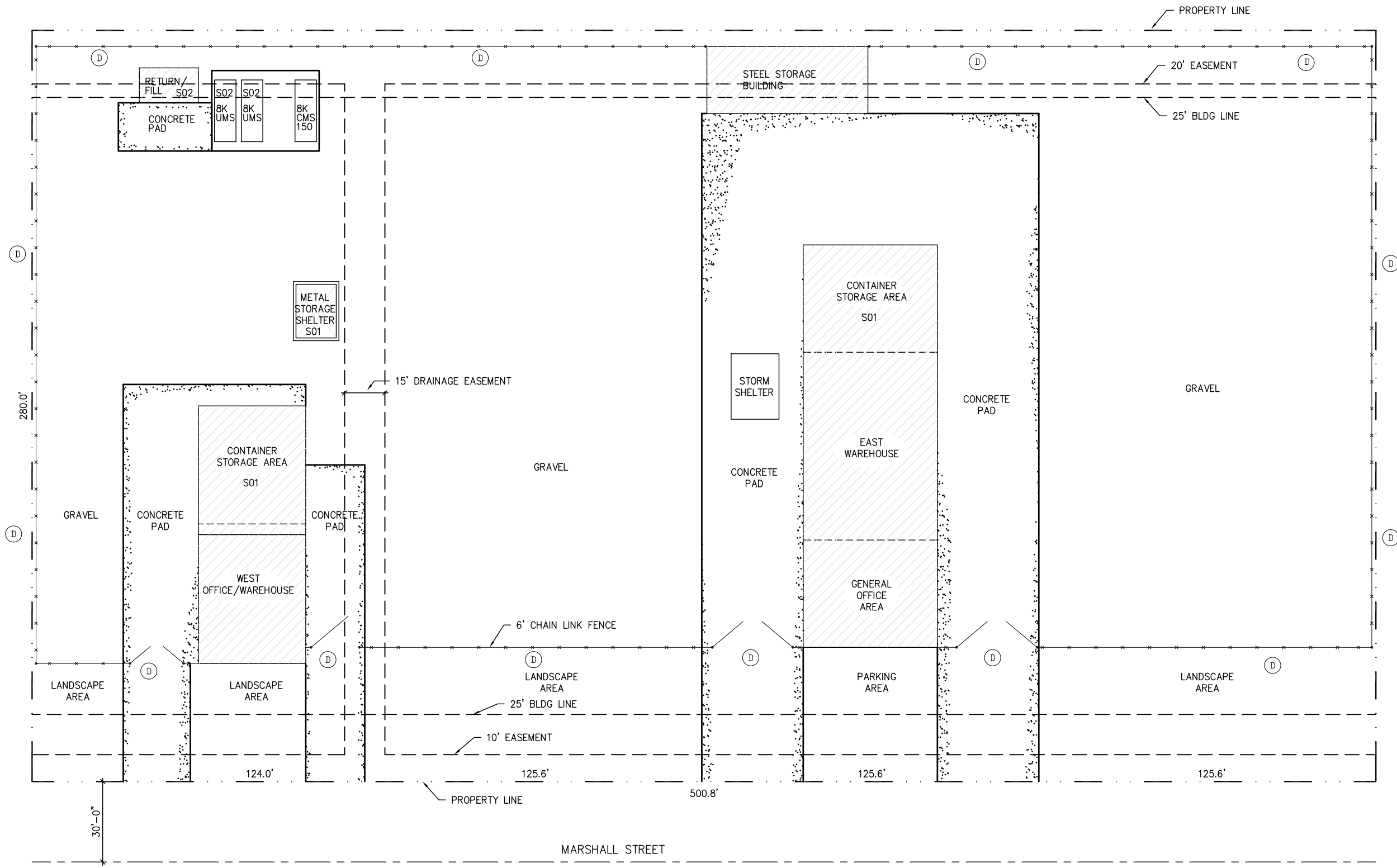
LEGEND:  
 (D) - 'DANGER' SIGN

PROPRIETARY STATEMENT

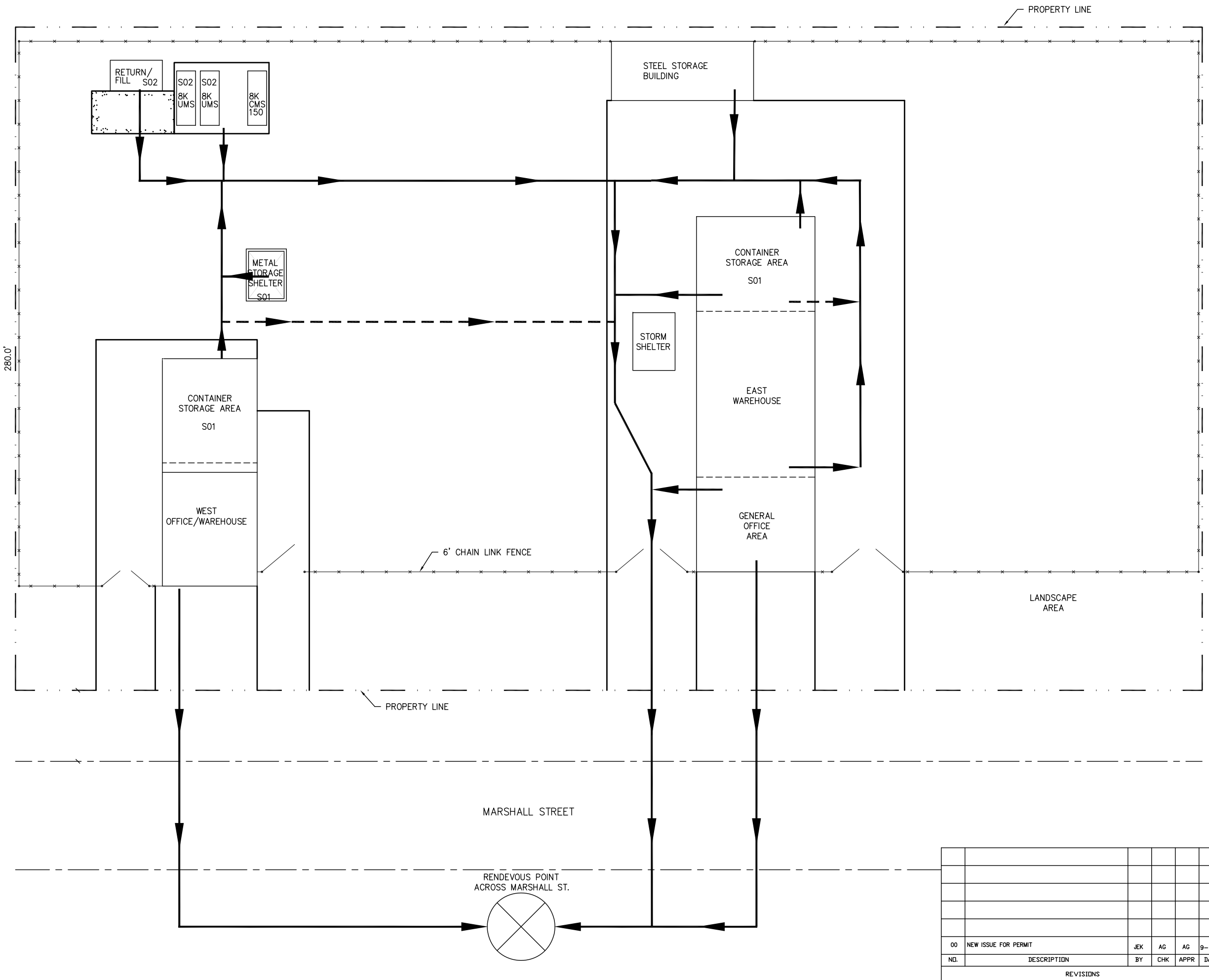
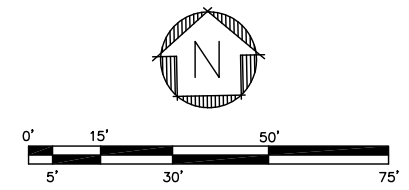
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TITLE		SITE PLAN 16319 E. MARSHALL	
 SAFETY-KLEEN SYSTEMS, INC. 42 LONGWATER DR. NORWELL, MA 02061 PHONE 800-669-5740		SCALE	1" = 20'-0"
BY	WEY	CHKD	P.E. APPR
DP. APPR	DATE	11/19/89	
SERVICE CENTER BRANCH AT		TULSA, OKLAHOMA	
STD-DWG-REV NO.		7105-SP00-001	

NO.	DESCRIPTION	BY	CHK	APPR	DATE
02	REVISE FOR 2011 PERMIT	JEK	AG	AG	9-13-11
01	REMOVE REFERENCE FOR VERTICAL TANK FARM AND TANKER PAD. SHOW REG OFFICE	WEY			12-4-95
00	REVISED SAFETY KLEEN DRAWING TO CADD AS DATED. REPLACES SAFETY KLEEN DRAWING D-12579	ALI			2-14-91
REVISIONS					



MARSHALL STREET



LEGEND:  
 ———▶ — PRIMARY EVAC ROUTE  
 - - - -▶ — ALTERNATE EVAC ROUTE

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TITLE  
 SITE EMERGENCY EVACUATION PLAN

**SAFETY-KLEEN SYSTEMS, INC.**  
 42 LONGWATER DR. NORWELL, MA. 02061  
 PHONE 800-669-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
00	NEW ISSUE FOR PERMIT	JEK	AG	AG	9-13-11
REVISIONS					

SCALE	BY	CHKD	P.E. APPR	DP. APPR	DATE
1" = 20'-0"	JEK	AG	AG	AG	9/12/11
SERVICE CENTER BRANCH AT					STD-DWG-REV NO.
TULSA, OKLAHOMA					7105-SP00-004

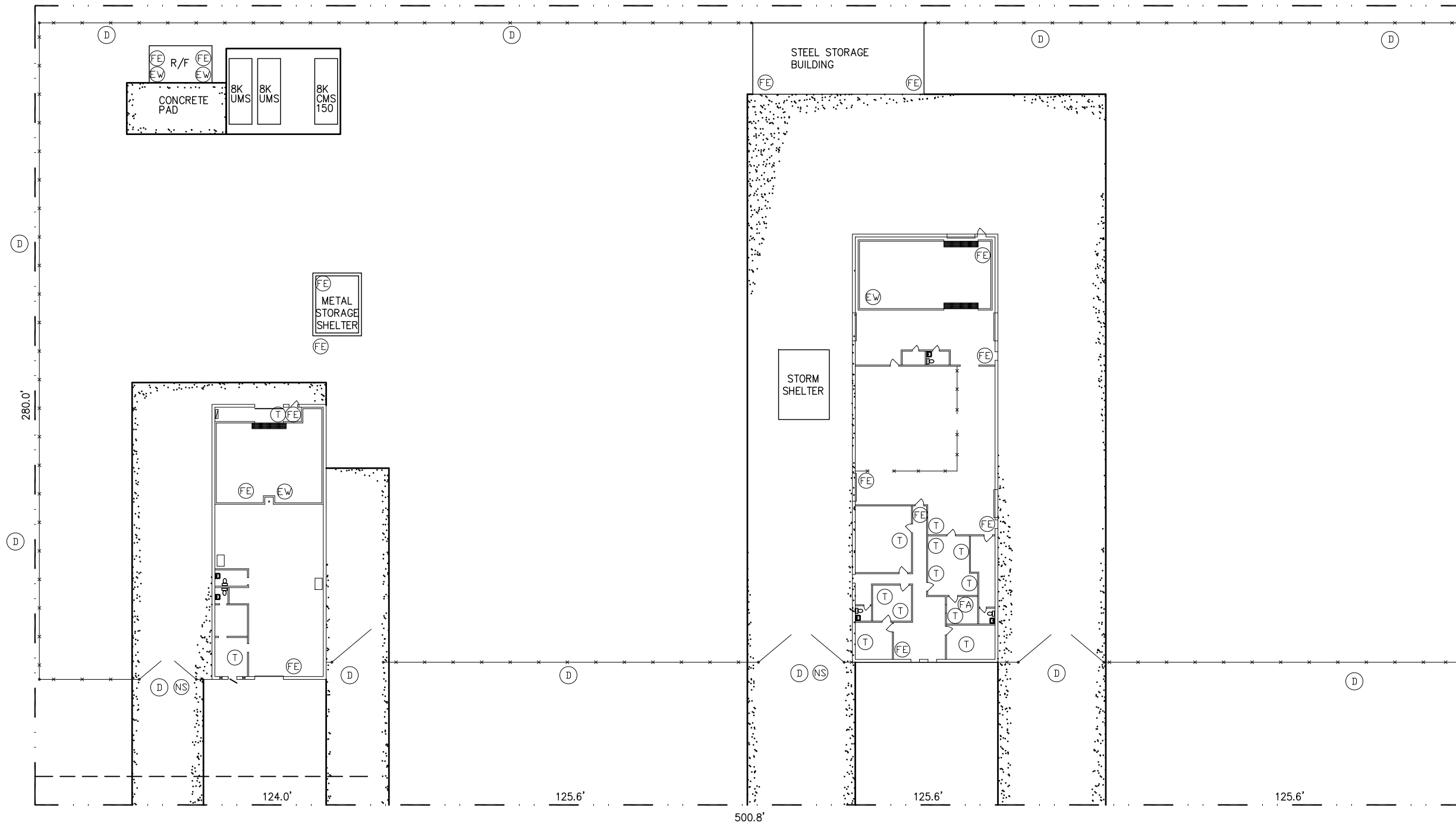
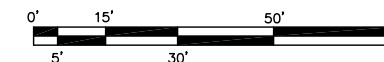


EXHIBIT F-6

LEGEND

- EYE WASH
- TELEPHONE
- FIRE EXTINGUISHER (TYPICAL 10# ABC)
- FIRST AID STATION
- "DANGER" SIGN
- "NO SMOKING" SIGN
- FIRE HYDRANT

PROPRIETARY STATEMENT

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MARSHALL STREET

TITLE  
SITE EMERGENCY  
EQUIPMENT LOCATIONS

SAFETY-KLEEN SYSTEMS, INC.  
42 LONGWATER DR. NORWELL, MA 02061  
PHONE: 800-669-5740

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	ISSUED FOR PERMIT	JEK	JZ	JZ	050624
00	ISSUED FOR 2011 PERMIT	JEK	AG	AG	022312
REVISIONS					

SCALE	BY	CHKD	P.E. APPR	DP. APPR	DATE
1" = 20'-0"	JEK	AG	AG	AG	2/23/12
SERVICE CENTER BRANCH AT TULSA, OKLAHOMA				STD-DWG-REV NO. 7105-SPO0-003	

### Exhibit F-5 Emergency Equipment List - Capabilities

Equipment	Location	Description	Capabilities
Gloves	Warehouse	Neoprene, Latex & Leather	Provide hand protection from cuts, splashes and exposure to contaminants
Safety Glasses	Warehouse	Glasses, goggles, face masks	Eye and splash protection
Aprons	Warehouse	Front coverage aprons	Prevent splashes to clothing
Eyewash/Shower Combo Eyewash	Areas with potential contamination to eyes (warehouse, return and fill)	Hard plumbed unit Portable unit Bottled eye wash	Purges contaminants from eyes and body
Fire Extinguisher	Office areas, warehouses, return and fill, flam shed, tank farm, all trucks	10 & 20 lb units	ABC rated for wood, paper, electrical and solvent fires.
Absorbent & Spill Dry Material	Warehouse, tank farm, route trucks	Booms, pads, granular absorbent, vermiculite	Capable of absorbing liquid spills of aqueous & petroleum type spills
Telephones	Warehouse and office	Standard office phone & company-supplied cell phones	Allows employees to summon outside assistance in case of emergency
Emergency Alarm	Return and Fill	Red push button alarm on dock	Alarm emits a loud siren, audible to surrounding area and inside office, to notify of a problem in the return and fill.
Brooms, Buckets, Mops, Portable Pump and Wet/Dry Vacuum	Warehouse		Used to contain and pick-up spills.
First Aid Kits	Warehouse, All trucks		Provide medical care for minor injuries

APPENDIX G  
TRAINING INFORMATION

Exhibit G-1  
Job Descriptions

## BRANCH GENERAL MANAGER

### JOB DESCRIPTION

The Branch General Manager (BGM) has overall responsibility for the facility operations and maintenance, and directs sales activities within a certain geographic area defined by the Corporate Marketing Department. He or she is responsible for the proper operations and profitability of the service center.

### REPORTS TO:

Area Manager

### QUALIFICATIONS:

Minimum high school graduate with Safety-Kleen sales experience.

### PRINCIPAL RESPONSIBILITIES:

1. Plan, direct, and monitor activities of sales representatives.
2. Training of branch sales managers, sales representatives, and other branch personnel.
3. Assist or accompany sales representatives during their sales activities when necessary.
4. Tabulate daily sales and inventory figures and report them to the corporate offices.
5. Maintain adequate inventory of solvents, allied products, and equipment.
6. Carry out corporate policies and standards regarding facilities, equipment operation and maintenance.
7. Insure the regular inspection of the facility and equipment, and the implementation of any necessary repairs or remedial actions.
8. Represent Safety-Kleen Systems, Inc. in local community affairs and public relations activities.
9. Coordinate with corporate Technical Services, Environmental Compliance and Health and Safety Departments and implement necessary actions or plans for regulatory compliance.
10. Be able to act as the primary emergency response coordinator.

## CUSTOMER SERVICE MANAGER

### JOB DESCRIPTION

The Customer Service Manager (CSM) is charged with the responsibility of generating new business and servicing established accounts within a certain defined geographic area. In addition, the Customer Service Manager may be the designate for some of the responsibilities of the Branch General Manager.

### REPORTS TO:

Branch General Manager

### QUALIFICATIONS:

Minimum high school graduate.

### PRINCIPAL RESPONSIBILITIES:

1. Maintain his/her route truck and replenish products on the truck before beginning his/her route sales.
2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
3. Exchange spent solvents with fresh solvent and replenish inventory of Safety-Kleen's products for existing customers.
4. Make minor repairs of Safety-Kleen's parts cleaner equipment or lease new equipment to the customers.
5. Prepare the necessary paper work for each service, and bill or credit the customer, as necessary.
6. At the end of each day or route, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the branch manager can tabulate the daily figures and forward them to the corporate office.
7. Be able to act as the alternate emergency response coordinator.
8. Perform other related duties as assigned by the Branch General Manager.

## BRANCH DISPATCHER

### JOB DESCRIPTION

The Branch Dispatcher is charged with the responsibility of fleet management including service route optimization, handheld management, and maintaining DOT compliance. In addition, the Branch Dispatcher may be the designate for some of the responsibilities of the Branch General Manager.

### REPORTS TO:

Branch General Manager

### QUALIFICATIONS:

Minimum high school graduate.

### PRINCIPAL RESPONSIBILITIES:

1. Ensure that handheld units are working effectively.
2. Optimize route efficiency for all drivers and ensure on-time performance.
3. Ensure that fleet trucks are in compliance with all DOT requirements including annual inspection requirements.
4. Maintain DOT compliance to Include Driver Qualification files, DVCR's, and Driver Log Compliance
5. Accountable for efficient inventory utilization and accuracy.
6. Responsible for all facility maintenance including vendor management.
7. Be able to act as the alternate emergency response coordinator.
8. Execute scheduling and routing, maximizing customer yield and asset utilization.

## MARKET SALES SPECIALIST

### JOB DESCRIPTION

The Market Sales Specialist is charged with the responsibility of generating new business and servicing established accounts within a certain defined geographic area.

### REPORTS TO:

Branch General Manager

### QUALIFICATIONS:

Minimum high school graduate.

### PRINCIPAL RESPONSIBILITIES:

1. Maintain his/her route truck and replenish products on the truck before beginning his/her route sales.
2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
3. Exchange spent solvents with fresh solvent and replenish inventory of Safety-Kleen's products for existing customers.
4. Make minor repairs of Safety-Kleen's parts cleaner equipment or lease new equipment to the customers.
5. Prepare the necessary paper work for each service, and bill or credit the customer, as necessary.
6. At the end of each day or route, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the branch manager can tabulate the daily figures and forward them to the corporate office.
7. Be able to act as the alternate emergency response coordinator.

## BRANCH ADMINISTRATOR

### JOB DESCRIPTION

The Branch Secretary performs duties to assist the branch manager, sales representatives and customers with billing, scheduling and recordkeeping. Performs secretarial duties at the branch.

### REPORTS TO:

Branch General Manager

### QUALIFICATIONS:

Attended high school.

### PRINCIPAL RESPONSIBILITIES:

1. Maintains records in an orderly manner.
2. Assist sales representatives in scheduling services.
3. Insure that all hazardous waste manifests are complete, and manage distribution and filing of copies.
4. Maintain Personnel Training Record files.
5. Maintain Facility Inspection Records.
6. Answer customer inquiries.
7. Manage customer billing.
8. Perform other related duties as assigned.
9. Be able to act as the alternate emergency response coordinator.

# MATERIAL HANDLER

## JOB DESCRIPTION

The Material Handler performs duties to assist the sales representatives in loading and unloading trucks. Performs janitorial duties in the warehouse.

## REPORTS TO:

Branch General Manager

## QUALIFICATIONS:

Attended high school.

## PRINCIPAL RESPONSIBILITIES:

1. Maintain warehouse in clean and orderly manner.
2. Assist sales representatives in loading trucks and replacing solvent.
3. Refurbish drums as needed.
4. Park or move trucks as needed.
5. Stock inventory.
6. Replenish trucks with inventory.
7. Perform other related duties as assigned.

Exhibit G-2  
Example Training Plan Outlines

EXAMPLE

**TRAINING PLAN OUTLINE - BRANCH GENERAL MANAGER**

Review of Environmental Notebooks/Feasibility Study and Plan of Operation

Part A Application	Financial Requirements
Waste Analysis Plan	Training Plan
Contingency Plan	Transportation Licensing

Review of Environmental Compliance Guidance and Corporate Policy Manual

Labels and Shipping Documents	Land Ban Notifications
Spill Reporting	Preparation for Agency Inspections

Conduct Detailed Facility Inspection with Regional Manager

- Identify deficiencies requiring branch attention
- Identify problems requiring Technical Services assistance
- Review actual vs. permitted waste storage capacities

File Review

Manifests and Land Ban Notices	Training Files
Spill Report File	Community Right-to-Know Files
Inspection Records	

Contingency Plan Training Session with Branch General Manager and All Alternate Emergency Coordinators

- Including Spill Simulation and Response
- Updating the Emergency Information and Local Authority Notifications

Notifications

Health and Safety

OSHA 300 Reporting	Hazardous Communication Program
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Review of Past Agency Inspections and Other Past Branch Compliance related issues

Environmental Training for Branch Personnel

- Recordkeeping
- Conducting Training Sessions

EXAMPLE

**INTRODUCTORY AND ANNUAL TRAINING TOPICS FOR**

**Service Center Personnel**

- A. Hazard Communication - Safety Training
- B. Hazard Communication - Understanding SDSs
- C. Waste Analysis Plan  
  
Includes a review of the Part A Permit Application; sampling and analysis procedures,  
and recordkeeping
- D. Preparedness and Prevention Plan and Contingency Plan
  - a. Procedure for using, inspection, repairing and replacing facility emergency response equipment must be reviewed
  - b. Communications or alarm systems
  - c. Response to fires or explosions
  - d. Response to ground water contamination incidents
  - e. Shutdown of facility operations
  - f. Automatic waste feed cut-off systems
- E. Preventing Injuries and Illness
- F. Hazards Associated with Handling Hazardous Materials  
  
Employees requiring the use of a respirator will be respirator fit tested
- G. Chemistry of Safety-Kleen Products
- H. Hazardous Materials Regulations
- I. Manifesting
- J. Spill Simulation and Spill Reports

NOTE: EMPLOYEES MAY NOT WORK IN UNSUPERVISED POSITIONS UNTIL THEY HAVE RECEIVED EMERGENCY RESPONSE TRAINING. EMPLOYEES MUST BE COMPLETELY TRAINED, IN ALL THE ITEMS LISTED ABOVE, WITHIN SIX MONTHS OF STARTING AND ANNUALLY THEREAFTER.

EXAMPLE  
PERSONNEL TRAINING COURSE REQUIREMENTS

PERSONNEL REQUIRED TO ATTEND INTRODUCTORY TRAINING COURSES

1. Branch General Manager
2. Branch Secretary
3. Customer Service Manager
4. Sales Representative
5. Material Handler

PERSONNEL REQUIRED TO ATTEND ANNUAL TRAINING COURSES

1. Branch General Manager
2. Branch Secretary
3. Customer Service Manager
4. Sales Representative
5. Material Handler

PERSONNEL REQUIRED TO RECEIVE ON THE JOB TRAINING

1. Branch General Manager
2. Branch Secretary
3. Customer Service Manager
4. Sales Representative
5. Material Handler

PERSONNEL RECEIVING TRAINING WHEN REGULATIONS AND/OR PROCEDURES CHANGE

1. Branch General Manager
2. Branch Secretary
3. Customer Service Manager
4. Sales Representative
5. Material Handler

## Exhibit G-3

### Example Training Record Form

**SAFETY-KLEEN SYSTEMS**  
**TRAINING ATTENDANCE /CERTIFICATION SHEET**



Date: \_\_\_\_\_ Training Location: Nashville, TN

Course Name: \_\_\_\_\_

Course Code: \_\_\_\_\_ Time: \_\_\_\_\_ Duration: \_\_\_\_\_

	PRINTED NAME	SIGNATURE	EMPLOYEE #	FACILITY (CITY, STATE)
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				
21.				
22.				
23.				
24.				
25.				

*The above listed employees have satisfactorily passed associated tests and, demonstrated satisfactory performance and comprehension of this course.*

Trainer: \_\_\_\_\_  
(Please Print Name)

Trainer's Signature: \_\_\_\_\_

Trainer's Location: \_\_\_\_\_

Trainer: \_\_\_\_\_  
(Please Print Name)

Trainer's Signature: \_\_\_\_\_

Trainer's Location: \_\_\_\_\_

APPENDIX H  
FINANCIAL REQUIREMENTS

Exhibit H-1  
Closure Schedule

### Estimated Closure Schedule

Calendar Days

Closure Activity	10	20	30	40	50	60	70	80	90	100	110	120	130	140	150	160	170	180	
1. End operations of facility; commence closure																			
2. Removal/disposal of final waste inventory																			
3. Decontaminate wet dumpster and secondary containment structure and dispose of the rinseate																			
4. Decontaminate spent solvent tank, ancillary piping and dispose of the rinsate																			
5. Remove wet dumpster, tank, ancillary piping and equipment, and contaminated materials and backfill excavation. (IF NECESSARY)																			
6. Dismantle and scrap or reuse the wet dumpster, tank and ancillary piping and equipment																			
7. Submit closure certification to the TN Department of Environment & Conservation																			

Exhibit H-2  
Closure Cost Estimate

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
<b>I. INVENTORY REMOVAL</b>				
<u>Assumptions</u>				
- Waste mineral spirits tank(s) is full			<b>Capacity (gallons)</b>	
- Tank One			8000	
- Tank Two			8000	
	Total Tank Capacity		<u>16000</u>	
- Return/Fill station is full				
- Maximum capacity of drum washers added to waste mineral spirits tank quantity			324	
- Container storage area(s) full				
- CSA 1			6192	
- CSA 2			0	
	Total CSA Capacity		<u>6192</u>	
- Flammable materials storage shelter is full			2184	
<u>Subcontractor Costs</u>				
- Transfer tank contents to tankers				
Tank Capacity (total gallons)			16324	
Work Rate to Unload Tank Capacity (hours per gallon)			0.0003	
Total Hours to Unload			4.9	
Labor and equipment rate to unload (PPE Level D) and cost	Labor/equipment	\$175.95	4.9	\$862
- 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 = 300 miles (Number in second column is 300 miles x number trucks)	Transport = 300 miles each	\$5.64	900	\$5,076
Disposal/treatment cost (per gallon - Average bulk liquid cost)	TSD @ \$1.67/gallon	\$1.670	16324	\$27,261
- Transfer drums from CSA(s) to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	113	\$403
(Number in second column is number of drums determined from total CSA capacity)				
- Transfer drums from Flammable Materials Storage Shed to trucks with forklift				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	40	\$143
(Number in second column is number of drums determined from flam shed capacity)				
- Transport drums to TSD for Treatment/Disposal				
Total Number of Drums (Number is total of CSA drums and Flam Shed drums)			153	
Total Number of Trucks Required to Transport Drums (84 per truck max)			2	
Cost per mile = \$5.64/mile				
Mileage = 300 miles (Number in second column is 300 miles x number of trucks)	Transport trailer(s) x 300 miles	\$5.64	600	\$3,384
Disposal/treatment cost (per drum - Average drum cost)	TSD @ \$179/drum	\$179	153	\$27,387
	<b>Activity 1. Subtotal</b>			<u>\$64,516</u>

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
<b>2. STORAGE TANK DECONTAMINATION</b>				
<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			611	
- Tank 2			611	
- Piping, 1,000 feet			785	
	Total Tank and Piping Interior Square Footage		2007	
- Tank Farm Containment Square Footage (includes floor and walls)			1979	
<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)			2	
Number of Samples				
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)			0.3050	
Work Rate for Drilling (hours per foot)			2	
Number of Feet (subslab sample depth = 1 foot each)				
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29	0.61	\$89
- Collect 2 Soil Samples			0.5000	
Work Rate for Sampling (hours per sample)			2	
Number of Samples				
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			0.0405	
Work Rate to Pressure Wash (hours per square foot)			2007	
Area of Tanks to be decontaminated				
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	\$97.23	81	\$7,902
- Decontaminate Tank Containment Area			0.0405	
Work Rate to Pressure Wash 1 sq ft (hours per square foot)			1979	
Total Area of Containment (includes walls and floor)				
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	\$65.77	80	\$5,271
<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		2	\$1,316
	Total per sample cost	\$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		2	\$1,316
	Total per sample cost	\$658		
Activity 2. Subtotal				\$16,079

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
<b>3. DECONTAMINATE THE RETURN/FILL STATION</b>				
<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				
			<b>Square Footage</b>	
			1000	
<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)			0.5000	
Work Rate for Sampling ( hours per sample)			3	
Number of Samples				
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.50	\$138
- 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)				
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29	0.61	\$89
- Collect Soil Samples			0.5000	
Work Rate for Sampling (per sample)			2	
Number of Samples				
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			0.0405	
Work Rate to Pressure Wash (hours per square foot)			1000	
Area of Return/Fill to be decontaminated				
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	\$97.23	41	\$3,938
<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		3	\$1,974
	Total per sample cost	\$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		2	\$1,316
	Total per sample cost	\$658		
Activity 3. Subtotal				\$7,547

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
<b>4. DECONTAMINATE CONTAINER STORAGE AREA(S)</b>				
<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				
- CSA 1			<b>Square Footage</b>	
- CSA 2			1190	
			1275	
	Total CSA Square Footage		2465	
<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			2465	
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	\$65.77	100	\$6,566
<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				\$8,540

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
<b>5. DECONTAMINATE THE FLAMMABLE STORAGE SHELTER</b>				
<u>Assumptions:</u>				
- Decontamination shall consist of washing with detergent/water solution and rinsing with high-pressure spray				
- Flammable Materials structure and dock area will remain in place				
- Assumes 1 rinsate sample required to leave in place				
- 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 dock, structure and containment				
			<b>Square Footage</b>	
			600	
<u>Prime Contractor Costs</u>				
-Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Samples (1 per Flam Shed)			0.5000	
Work Rate for Sampling ( hours per sample)			1	
Number of Samples				
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)			0.3050	
Work Rate for Drilling (hours per foot)			2	
Number of Feet (subslab sample depth = 1 foot each x number of samples)				
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29	0.61	\$89
- Collect Soil Samples			0.5000	
Work Rate for Sampling (hours per sample)			2	
Number of Samples				
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.00	\$92
<u>Subcontractor Costs</u>				
- Decontaminate structure, grating and containment			0.0405	
Work Rate to Pressure Wash (hours per square foot)			600	
Total Area of Permitted Flam Shed to be decontaminated				
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	\$65.77	24	\$1,598
<u>Laboratory Subcontractor Costs</u>				
- Analyze rinsate sample(s) from each shelter 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 shelter 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 5. Subtotal				\$3,799

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
6. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				
<u>Assumptions:</u>				
- Amount of decon wash water generated based on approximately 1.0 gal/ sq ft for tank systems and other surface areas.				
Unit Description	Square Footage	Number Gallons	Number Drums	
STORAGE TANK DECONTAMINATION	2,007	2007	37	
DECONTAMINATE TANK CONTAINMENT	1,979	1979	36	
DECONTAMINATE THE RETURN/FILL STATION	1,000	1000	19	
DECONTAMINATE CONTAINER STORAGE AREA(S)	2,465	2465	45	
DECONTAMINATE THE FLAMMABLE STORAGE SHELTER	600	600	11	
PPE, CONSUMABLES, DEBRIS	NA	NA	5	
- Purchase 55-gallon drums to containerize wash water	Drums @ \$83 each	\$83	153	\$13,969
<u>Subcontractor Costs</u>				
- Transfer drums to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	153	\$546
- Transport drums to TSD for Treatment/Disposal				
Total Number of Trucks Required to Transport Drums (84 per truck max)			2	
Cost per mile = \$5.64/mile				
Mileage = 300 miles (Number in second column is 300 miles x number trucks)	Transport trailer(s) x 300 miles	\$5.64	600	\$3,384
Disposal/treatment cost (per drum - Average drum liquid cost)	TSD @ \$179/drum	\$179	148	\$26,492
Disposal/treatment cost for PPE drums (Average drum solid cost)	TSD @\$253/drum	\$253	5	\$1,265
Activity 6. Subtotal				\$45,656

	Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
7.	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	6	\$24,708
		Activity 7. Subtotal			\$24,708

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
<b>COST ESTIMATE ACTIVITIES SUMMARY</b>				
1. INVENTORY REMOVAL				\$64,516
2. STORAGE TANK DECONTAMINATION				\$16,079
3. DECONTAMINATE THE RETURN/FILL STATION				\$7,547
4. DECONTAMINATE CONTAINER STORAGE AREA(S)				\$8,540
5. DECONTAMINATE THE FLAMMABLE STORAGE SHELTER				\$3,799
6. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				\$45,656
7. CLOSURE CERTIFICATION				\$24,708
TOTAL CLOSURE COST ESTIMATE				\$170,845
TOTAL CLOSURE COST ESTIMATE ADJUSTED FOR INFLATION 2009 TO PRESENT				\$232,619
CONTINGENCY				20%
TOTAL CLOSURE COST WITH CONTINGENCY				\$279,143

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 \$1.67/gallon - average Cost Pro bulk haz liquid
  - Disposal for CSA liquids \$179/drum - average Cost Pro drum haz liquid
  - Disposal of decon wash water \$179/drum - average Cost Pro haz liquid
  - 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

Exhibit H-3

Certificate of Liability Insurance



VIA FEDERAL EXPRESS TRK #772829843184

July 24, 2023

Ms. Carol Bartlett, Environmental Programs Specialist  
Land Protection Division  
Oklahoma Department of Environmental Quality  
707 North Robinson Street  
Oklahoma City, OK 73102

**RE: Financial Assurance Insurance Policy Renewal and Annual Inflation Increase**

Safety-Kleen Systems, Inc.

7528 New Castle Road, Oklahoma City

8800 SW 8<sup>th</sup> Street, Oklahoma City

16319 E. Marshall Street, Tulsa

EPA ID No. OKD980878474

EPA ID No. OKD987086774

EPA ID No. OKD000763821

Dear Ms. Bartlett:

Please find enclosed three (3) original signed Certificates of Insurance for Closure and/or Post Closure Care issued by Great American Insurance Company. The renewed policy number is CPC E601049 03 and the policy is effective July 31, 2023 through July 31, 2024. In addition, the closure cost estimates have been increased for annual inflation.

The increases were calculated by multiplying the existing 2022 closure cost estimate by the annual inflation factor for Gross National Product 1.0698. This inflation factor was found on the DEQ website under the Solid Waste Annual inflation link (copy attached):

<https://www.deq.ok.gov/land-protection-division/waste-management/solid-waste/>

New Castle Road (Closure):	$\$102,294 \times 1.0698 = \$109,455$
8 <sup>th</sup> Street (Closure):	$\$150,031 \times 1.0698 = \$160,533$
Tulsa (Closure):	$\$149,215 \times 1.0698 = \$159,660$

If you have any questions regarding this submittal or require any additional information, please contact me at 219-746-5050 or at [Harvey.Pamela@cleanharbors.com](mailto:Harvey.Pamela@cleanharbors.com).

Sincerely,

Pamela K. Harvey, CHMM  
Sr. Manager Environmental Compliance

Enclosures

Safety-Kleen Systems, Inc. a Clean Harbors Company  
610 131<sup>st</sup> Place Hammond, IN 46327

## **CERTIFICATE OF INSURANCE FOR CLOSURE AND/OR POST-CLOSURE CARE**

Name and Address of Insurer (herein called the "Insurer"):

Great American Insurance Company  
301 E. 4<sup>th</sup> Street  
Cincinnati, OH 45202

Name and Address of Insured, (herein called the "Insured"):

Clean Harbors, Inc.  
42 Longwater Drive  
Norwell, Massachusetts 02061


### FACILITIES COVERED:

Name:	Safety-Kleen Systems, Inc.
Address:	7528 New Castle Road Oklahoma City, OK 73169
EPA ID Number:	OKD 980 878 474
Closure:	\$109,455
Face Amount:	\$429,648
Policy Number:	CPC E601049 03
Effective Date:	July 31, 2023

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d) as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.


Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ), the Insurer agrees to furnish to the DEQ Executive Director a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e), United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
(Authorized signature for Insurer)

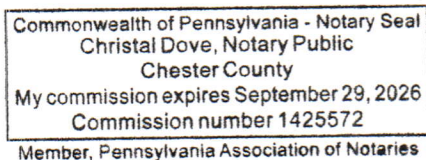
Rick Ringenwald  
(Name of person signing)

Divisional Vice President, Executive Underwriter  
(Title of person signing)

  
\_\_\_\_\_  
(Signature of witness or notary)

7/11/2023  
\_\_\_\_\_  
(Date)

SEAL:



## CERTIFICATE OF INSURANCE FOR CLOSURE AND/OR POST-CLOSURE CARE

Name and Address of Insurer (herein called the "Insurer"):

Great American Insurance Company  
301 E. 4<sup>th</sup> Street  
Cincinnati, OH 45202

Name and Address of Insured, (herein called the "Insured"):

Clean Harbors, Inc.  
42 Longwater Drive  
Norwell, Massachusetts 02061

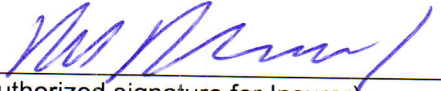
### FACILITIES COVERED:

Name:	Safety-Kleen Systems, Inc.
Address:	8800 SW 8 <sup>th</sup> Street Oklahoma City, OK 73128
EPA ID Number:	OKD 987 086 774
Closure:	\$160,533
Face Amount:	\$429,648
Policy Number:	CPC E601049 03
Effective Date:	July 31, 2023

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.


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I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e), United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
(Authorized signature for Insurer)

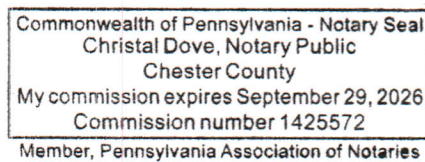
Rick Ringerwald  
(Name of person signing)

Divisional Vice President, Executive Underwriter  
(Title of person signing)

  
\_\_\_\_\_  
(Signature of witness or notary)

7/14/2023  
\_\_\_\_\_  
(Date)

SEAL:



## **CERTIFICATE OF INSURANCE FOR CLOSURE AND/OR POST-CLOSURE CARE**

Name and Address of Insurer (herein called the "Insurer"):

Great American Insurance Company  
301 E. 4<sup>th</sup> Street  
Cincinnati, OH 45202

Name and Address of Insured, (herein called the "Insured"):

Clean Harbors, Inc.  
42 Longwater Drive  
Norwell, Massachusetts 02061

### FACILITIES COVERED:

Name:	Safety-Kleen Systems, Inc.
Address:	16319 E. Marshall St. Tulsa, OK 74116
EPA ID Number:	OKD 000 763 821
Closure:	\$159,660
Face Amount:	\$429,648
Policy Number:	CPC E601049 03
Effective Date:	July 31, 2023

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d) as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ), the Insurer agrees to furnish to the DEQ Executive Director a duplicate original of the policy listed above, including all endorsements thereon.



Environmental Division

397 Eagleview Blvd, Suite 100  
Exton, PA 19341  
888.828.4320 ph

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e), United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulations were constituted on the date shown immediately below.

[Signature]  
(Authorized signature for Insurer)

Rick Ringenwald  
(Name of person signing)

Divisional Vice President, Executive Underwriter  
(Title of person signing)

[Signature]  
(Signature of witness or notary)

7/11/2023  
(Date)

SEAL:

Commonwealth of Pennsylvania - Notary Seal  
Christal Dove, Notary Public  
Chester County  
My commission expires September 29, 2026  
Commission number 1425572  
Member, Pennsylvania Association of Notaries

The following charts identify the annual inflation adjustments to be applied to solid waste disposal facility closure and post-closure cost estimates.

**IMPLICIT PRICE DEFLATOR  
GROSS DOMESTIC PRODUCT**  
(Updated January 31<sup>st</sup> of each year)

<b>Year</b>			<b>Inflation</b>
<b>1998</b>	1997 IPD = 101.95	1996 IPD = 100.00	1.95%
<b>1999</b>	1998 IPD = 103.22	1997 IPD = 101.95	1.25%
<b>2000</b>	1999 IPD = 104.77	1998 IPD = 103.22	1.50%
<b>2001</b>	2000 IPD = 106.92	1999 IPD = 104.77	2.05%
<b>2002</b>	2001 IPD = 109.23	2000 IPD = 106.92	2.16%
<b>2003</b>	2002 IPD = 110.66	2001 IPD = 109.23	1.31%
<b>2004<sup>1</sup></b>	2003 IPD = 105.643	2002 IPD = 103.945	1.63%
<b>2005</b>	2004 IPD = 108.220	2003 IPD = 105.643	2.44%
<b>2006</b>	2005 IPD = 112.113	2004 IPD = 108.220	3.60%
<b>2007</b>	2006 IPD = 116.034	2005 IPD = 112.737	2.93 %
<b>2008</b>	2007 IPD = 119.674	2006 IPD = 116.567	2.66 %
<b>2009</b>	2008 IPD = 122.357	2007 IPD = 119.816	2.12%
<b>2010</b>	2009 IPD = 109.777	2008 IPD = 108.483	1.19%
<b>2011</b>	2010 IPD = 110.654	2009 IPD = 109.615	0.95%
<b>2012</b>	2011 IPD = 113.327	2010 IPD = 110.992	2.10%
<b>2013</b>	2012 IPD = 115.360	2011 IPD = 113.359	1.76%
<b>2014</b>	2013 IPD = 106.570	2012 IPD = 105.002	1.49%
<b>2015</b>	2014 IPD = 108.272	2013 IPD = 106.733	1.44%
<b>2016</b>	2015 IPD = 109.767	2014 IPD = 108.686	0.99%
<b>2017</b>	2016 IPD = 111.446	2015 IPD = 109.998	1.32%
<b>2018</b>	2017 IPD = 113.422	2016 IPD = 111.416	1.02%
<b>2019</b>	2018 IPD = 110.389	2017 IPD = 107.948	2.26%
<b>2020</b>	2019 IPD = 112.355	2018 IPD = 110.420	1.75%
<b>2021</b>	2020 IPD = 113.626	2019 IPD = 112.265	1.21%
<b>2022</b>	2021 IPD = 118.357	2020 IPD = 113.648	4.14 %
<b>2023</b>	2022 IPD = 127.192	2021 IPD = 118.895	6.98 %

**IMPLICIT PRICE DEFLATOR  
GROSS NATIONAL PRODUCT**  
(Updated March 31<sup>st</sup> of each year)

<b>Year</b>			<b>Inflation</b>
<b>1998</b>	1997 IPD = 101.93	1996 IPD = 100.00	1.93%
<b>1999</b>	1998 IPD = 103.19	1997 IPD = 101.93	1.24%
<b>2000</b>	1999 IPD = 104.77	1998 IPD = 103.19	1.53%
<b>2001</b>	2000 IPD = 106.89	1999 IPD = 104.73	2.06%
<b>2002</b>	2001 IPD = 109.21	2000 IPD = 106.89	2.17%
<b>2003</b>	2002 IPD = 110.63	2001 IPD = 109.21	1.30%
<b>2004<sup>1</sup></b>	2003 IPD = 105.671	2002 IPD = 103.932	1.67%
<b>2005</b>	2004 IPD = 109.091	2003 IPD = 106.299	2.63%
<b>2006</b>	2005 IPD = 112.129	2004 IPD = 109.091	2.78%
<b>2007</b>	2006 IPD = 116.036	2005 IPD = 112.726	2.94%
<b>2008</b>	2007 IPD = 119.656	2006 IPD = 116.558	2.66 %
<b>2009</b>	2008 IPD = 122.407	2007 IPD = 119.813	2.17%
<b>2010</b>	2009 IPD = 109.764	2008 IPD = 108.486	1.18%
<b>2011</b>	2010 IPD = 110.654	2009 IPD = 109.609	0.95%
<b>2012</b>	2011 IPD = 113.347	2010 IPD = 110.971	2.14%
<b>2013</b>	2012 IPD = 115.387	2011 IPD = 113.353	1.79%
<b>2014</b>	2013 IPD = 106.710	2012 IPD = 105.126	1.51%
<b>2015</b>	2014 IPD = 108.407	2013 IPD = 106.854	1.45%
<b>2016</b>	2015 IPD = 109.868	2014 IPD = 108.800	0.98%
<b>2017</b>	2016 IPD = 111.528	2015 IPD = 110.090	1.31%
<b>2018</b>	2017 IPD = 113.500	2016 IPD = 111.509	1.79 %
<b>2019</b>	2018 IPD = 110.308	2017 IPD = 107.903	2.23%
<b>2020</b>	2019 IPD = 112.257	2018 IPD = 110.320	1.76%
<b>2021</b>	2020 IPD = 113.586	2019 IPD = 112.227	1.21%
<b>2022</b>	2021 IPD = 118.349	2020 IPD = 113.636	4.15%
<b>2023</b>	2022 IPD = 127.194	2021 IPD = 118.871	7.00%

Information for tables obtained from Bureau of Economic Analysis  
Table 1.1.9 at

<https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#>

<sup>1</sup>In 2004, the Bureau of Economic Analysis revised its indexing and set the baseline index at 100 for the year 2000. Previous implicit price deflators were based on a baseline index of 100 for the year 1996.



Clean Harbors Environmental Services, Inc.  
610 131<sup>st</sup> Place  
Hammond, IN 46327  
219-746-5050  
800.282.0058  
[www.cleanharbors.com](http://www.cleanharbors.com)

**VIA FEDERAL EXPRESS TRK #773907022991**

October 30, 2023

Ms. Carol Bartlett, Environmental Programs Specialist  
Land Protection Division  
Oklahoma Department of Environmental Quality  
707 North Robinson  
Oklahoma City, OK 73102

**RE: Hazardous Waste Facility Liability Insurance**

Clean Harbors Lone Mountain LLC, (Waynoka, OK) – EPA ID No. OKD065438376  
Clean Harbors Lone Mountain LLC (Avard, OK) – EPA ID No. OK0000070136  
Tulsa Disposal LLC – EPA ID No. OKD000632737  
Safety-Kleen Systems, Inc. – multiple sites

Dear Ms. Bartlett:

Please find enclosed four (4) original signed Hazardous Waste Facility Certificates of Liability Insurance issued by Great American Insurance Company. Three (3) certificates are for the three Clean Harbors facilities referenced above while the fourth certificate covers all of the Safety-Kleen Systems, Inc. facilities located in Oklahoma. The policy number is PRE E603235 03 and the policy period is November 1, 2023 – November 1, 2024.

A signed duplicate original of the policy will be made available in 30-60 days and submitted upon a request from the Oklahoma DEQ.

If you have any questions regarding this submittal feel free to contact me at 219-746-5050 or [Harvey.Pamela@cleanharbors.com](mailto:Harvey.Pamela@cleanharbors.com).

Sincerely,

A handwritten signature in black ink that reads "Pamela K. Harvey". The signature is written in a cursive style and is positioned above the printed name and title.

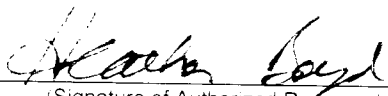
Pamela K. Harvey, CHMM  
Sr. Manager Environmental Compliance

Enclosures

**HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE**

1. Great American Insurance Company, the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Clean Harbors, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID#OKD 065438376 Clean Harbors Lone Mountain, LLC 40355 S. County Road 236, Waynoka, OK 73860, for sudden and nonsudden accidental occurrences. The limits of liability are \$5,000,000 each occurrence, and \$10,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 032 issued on November 1, 2023. The effective date of said policy is November 1, 2023.
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).
  - (c) Whenever requested by a Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, 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 Executive Director.
  - (e) Any other termination of the insurance 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 Executive Director.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) United States Environmental Protection Agency approved amendment, for the State of Oklahoma, 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.



(Signature of Authorized Representative of Insurer)

Date:

11/1/2023

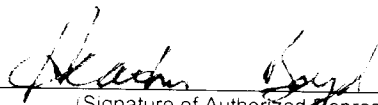
Heather Boyd, Divisional/Subsidiary Vice President, Environmental Division  
Authorized Representative of :

Great American Insurance Company  
31 St. James Ave., Suite 830  
Boston, MA 02116

**HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE**

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(Signature of Authorized Representative of Insurer)

Date:

11/1/2023

Heather Boyd, Divisional/Subsidiary Vice President, Environmental Division  
Authorized Representative of Great American Insurance Company  
31 St. James Ave., Suite 830  
Boston, MA 02116

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  - (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, 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 Executive Director.
  
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\_\_\_\_\_  
(Signature of Authorized Representative of Insurer)

Date: 11/1/2023


Heather Boyd, Divisional/Subsidiary Vice President, Environmental Division  
Authorized Representative of:

Great American Insurance Company  
31 St. James Ave., Suite 830  
Boston, MA 02116

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\_\_\_\_\_  
(Signature of Authorized Representative of Insurer)

Date: 11/1/2023

Heather Boyd, Divisional/Assistant Vice President, Environmental Division  
Authorized Representative of:

Great American Insurance Company  
31 St. James Ave., Suite 830  
Boston, MA 02116

## **SAFETY-KLEEN SYSTEMS, INC. LOCATIONS**

### **STATE OF OKLAHOMA**

**7528 New Castle Road  
Oklahoma City, OK 73169**

**OKD980878474**

**26 N.E. 9<sup>th</sup> Street  
Oklahoma City, OK 73104**

**OKD018775469**

**8800 SW 8<sup>th</sup>  
Oklahoma City, OK 73128**

**OKD987086774**

**5550 E. Channel Road  
Port of Catoosa, OK 74015**

**OKD982558207**

**16319 E. Marshall Street  
Tulsa, OK 74116**

**OKD000763821**