Division of Waste Management and Radiation Control

USED OIL TRANSFER FACILITY PERMIT

Permittee:	**Clean Harbors Clive, LLC**
Permittee Mailing Address:	P.O. Box 22285 Salt Lake City, Utah 84122
Permittee Phone Number:	(435) 884-8573
Permittee Contact:	**Branden Prettyman, Facility Operations Manager** (435) 884-8573 – office (435) 840-5469 – cell Email: prettyman.branden@cleanharbors.com
Permittee Transfer Facility Address:	3.5 miles South of Exit 49 Clive, UT 84074
Facility Contact:	**Branden Prettyman, Facility Operations Manager** (435) 884-8573 office (435) 840-5469 cell Email: prettyman.branden@cleanharbors.com
Type of Permit:	**Used Oil Transfer Facility Permit**
Permit #:	**UOP-0092**
EPA ID #:	UTD982595795
Original Date of Issuance:	December 28, 2009

Signature:_____ Date: _____

Ty L. Howard, Director
Division of Waste Management and Radiation Control

I.A. Effect of Permit

I.A.1. Clean Harbors Clive, LLC (hereafter referred to as "the Permittee") is hereby authorized to operate a Used Oil Transfer Facility located 3.5 miles south of I-80 Exit 49, Clive, UT 84074, in accordance with all applicable requirements of R315-15 of the Utah Administrative Code (UAC) and the Used Oil Management Act (the Act) 19-6-701 et. seq., Utah Code Annotated and this Permit.

I.A.2. This Permit shall be effective for a term not to exceed ten years in accordance with the requirements of R315-15-15 of the Utah Administrative Code. This Permit shall be reviewed by the Director five years after the Permit's effective date of issuance or when the Director determines that the Permit requires review.

I.A.3 Attachments incorporated by reference are enforceable conditions of this Permit, as are documents incorporated by reference into the attachments. Language in this Permit supersedes any conflicting language in the attachments or documents incorporated into the attachments.

I.B. Permit Revocation

I.B.1. Violation of any permit condition or failure to comply with any provision of the applicable statutes and rules shall be grounds for enforcement actions, including revocation of this Permit. The Director shall notify the Permittee in writing of his intent to revoke this Permit.

I.C. Permit Modification

I.C.1. The Permittee may request modifications to any item or activity covered by this Permit by submitting a written permit modification request to the Director. If the Director determines the modification request is substantive, a public hearing, a 15-day public comment period, or both may be required before a decision by the Director on the modification request. Implementing a substantive modification prior to the Director's written approval constitutes a violation of the Permit and may be grounds for enforcement action or permit revocation.

I.C.2. The Director may modify this Permit as necessary to protect human health and the environment, because of statutory or regulatory changes or because of operational changes affecting this Permit.

I.C.4. The Permittee shall notify the Director, in writing, of any non-substantive changes, such as changes in the contact person, within 20 days of the change.

I.D. Spill Prevention, Emergency Controls, and Maintenance

I.D.1. The Permittee shall maintain and operate the transfer facility, including all used oil transportation vehicles, storage units, containers, tanks and associated equipment to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, ground, soil, surface and groundwater and sewer systems.

I.D.2 To ensure compliance with this section, the Permittee shall inspect and maintain used oil equipment, tanks, containers, storage units and transportation vessels according to the Inspection Matrix in Attachment 3 of the Permittee's State-issued RCRA Part B Permit and section 5.0 of Attachment 5 of this permit. The Clive Rail Spur will be inspected for leaks weekly, at a minimum, when used oil is present.

I.D.3 Secondary containment is required for containers and tanks, including any piping connections and valves, in accordance with R315-15-4.6(d) of the Utah Administrative Code.

I.D.4 In the event of a release of used oil, the Permittee shall comply with the Emergency Controls and reporting requirements specified in R315-15-9 Utah Administrative Code and the Permittee's Emergency Spill Plan in Attachment 5.

I.D.5. It shall not constitute a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permittee business activity in order to maintain compliance with the conditions of this permit and attachments.

I.D.6 The Permittee is subject to all applicable Spill Prevention, Control and Countermeasures as defined in 40 CFR 112.

I.E. Record Retention

I.E.1. The Permittee shall maintain all applicable used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permittee's used oil transfer facility or at the Clean Harbors Aragonite, LLC facility located at 11600 North Aptus Road, Aragonite, UT 84029.

I.E.2. All records shall be readily accessible for inspection by representatives of the Director. Records may be in a hard copy or electronic format. Records shall be maintained for a minimum of three years.

I.F. Tracking

I.F.1. The Permittee shall keep documentation of each used oil load received, transferred and delivered to verify storage periods.

I.F.2. The Permittee's facility acceptance records shall document the permitted transporter's name, address, EPA identification number, the name of the receiving entities, date of

acceptance and signatures of both the transporter and an authorized representative of the Permittee.

I.F.3. The Permittee's facility shipping records shall document the transfer of the used oil to a permitted used oil transporter, transfer facility, burner or processor. This record shall have the company name, address and EPA identification number of the entity receiving the used oil. Both the Permittee and the receiving entity (dated upon receipt) shall sign the shipping record.

I.G. Sampling and Analyses

I.G.1. The Permittee shall follow all sampling and analytical procedures in Condition II.D and Attachment 4 when conducting used oil sampling and analytical testing to meet the requirements of R315-15 of the Utah Administrative Code and this Permit.

I.H. Prohibited Waste

I.H.1. Used oil that has been mixed with hazardous waste as defined by R315-261 of the Utah Administrative Code or PCBs as defined by R315-301-2(53) of the Utah Administrative Code shall no longer be managed as used oil and shall be subject to applicable hazardous waste and PCB-contaminated waste rules.

I.H.2. Used oil shall not be stored in tanks, containers or storage units that previously stored hazardous waste unless these tanks, containers, storage units and associated piping are cleaned in accordance with R315-261-7 of the Utah Administrative Code.

I.H.3. The Permittee shall not place, manage, discard or otherwise dispose of used oil in any manner specified in R315-15-1.3 of the Utah Administrative Code.

I.I. Waste Characterization and Disposal

I.I.1. The Permittee shall properly characterize used oil waste related material to determine if the wastes are hazardous or non-hazardous in accordance with R315-15-8 of the Utah Administrative Code and manage it accordingly.

I.I.2. The Permittee shall maintain records showing characterization, handling and disposal of waste generated at the facility.

I.J. Used Oil Storage

I.J.1. The Permittee shall not store used oil longer than 35 days without first obtaining a processor permit for that storage location. This includes storing used oil in vehicles at loading and unloading docks and parking areas and in rail cars at the Clive Rail Spur.

I.J.2. The Permittee shall have secondary containment for all storage units, containers, tanks, transportation vehicles and associated piping in accordance with R315-15-4.6 of the Utah Administrative Code. Secondary Containment is defined for each storage area in Attachment 2, Used Oil Containment Areas.

I.J.3. The Permittee shall not store used oil in units other than tanks, containers or units subject to regulations under R315-265 or R315-264 of the Utah Administrative Code.

I.J.4. Frac tanks in which used oil is stored for more than 90 days shall be regulated as used oil storage tanks under this permit.

I.J.5. The Permittee shall label all used oil containers, tanks and, when applicable, associated piping with the words "Used Oil."

I.K. Liability and Financial Requirements

I.K.1. The Permittee shall be financially responsible for cleanup and closure costs, general liabilities and environmental pollution legal liability for bodily or property damage to third parties resulting from the release of used oil in accordance with R315-15-10 through 12 of the Utah Administrative Code and this Permit.

I.K.2. The Permittee shall provide documentation of financial responsibility for cleanup and closure, environmental pollution legal liability and general liability coverage annually to the Director for review and approval by March 1 of each reporting year or upon request by the Director.

I.K.3. The Permittee shall receive written approval from the Director for any changes in the extent, type (e.g., mechanism, insurance carrier, or financial institution) or amount of the environmental pollution legal liability or financial assurance mechanism for coverage of physical or operational conditions at the facility that change the nature and extent of cleanup and closure costs. The Permittee shall receive approval from the Director prior to implementation of these changes.

I.L. Cleanup and Closure Plan

I.L.1. The Permittee shall update its closure plan cost estimates and provide the update estimated to the Director, in writing, within 60 days following a facility modification that causes an increase in the financial responsibility required under R315-15-10 of the Utah Administrative Code. Within 30 days of the Director's written approval of a permit modification for the cleanup and closure plan that would result in an increase cost estimate, the owner or operator shall provide to the Director the information specified in R315-15-11.2(b)(2) of the Utah Administrative Code and Condition II.G of this Permit.

I.L.2. The Permittee shall initiate closure of the facility within 90 days after the Permittee receives the final volume of used oil or after the Director revokes the Permittee's Transfer Facility Permit in accordance with the requirements of R315-15-11.3 of the Utah Administrative Code and this Permit.

I.L.3. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, a certification that the facility has been closed in accordance with R315-15-11.4 of the Utah Administrative Code and the specifications of the approved cleanup and closure plan. An independent, Utah-registered professional engineer and the Permittee shall sign the closure certification.

I.L.4. Additional sampling and remediation may be required by the Director to verify that cleanup and closure has been completed according to R315-15 of the Utah Administrative Code.

I.M. Used Oil Handler Certificate

I.M.1. In accordance with R315-15-4 of the Utah Administrative Code, the Permittee shall not operate as a used oil transfer facility without obtaining annually a Used Oil Handler Certificate from the Director. The Permittee shall pay a used oil handler fee, pursuant to Utah Code 63J-1-504, by December 31 of each calendar year to receive certification for the upcoming calendar year.

I.N. Inspection and Inspection Access

I.N.1. Any duly authorized employee of the Director may, at any reasonable time and upon presentation of credentials, have access to and the right to copy any records relating to used oil and to inspect, audit or sample. The employee may also make record of the inspection by photographic, electronic, audio, video or any other reasonable means to determine compliance.

I.N.2. The authorized employees may collect soil, groundwater or surface water samples to evaluate the Permittee's compliance.

I.N.3. Failure to allow reasonable access to the property by an authorized employee may constitute "denial of access" and may be grounds for enforcement action or permit revocation.

I.O. Annual Report

I.O.1. As required by R315-15-13.4 of the Utah Administrative Code, the Permittee shall prepare and submit an Annual Report to the Director by March 1 of the following year. The Annual Report shall describe the Permittee's used oil activities in Utah and document financial assurance using the Division's Transfer Facility Annual Report form.

I.P. Other Laws

I.P.1 Nothing in this Permit shall be construed to relieve the Permittee of his obligation to comply with any Federal, State or local law.

I.Q. Enforceability

I.Q.1. Violations documented through the enforcement process pursuant to Utah Code Annotated 19-6-112 may result in penalties in accordance with R315-102 of the Utah Administrative Code.

I.R. Effective Date

I.R.1. The permit is effective on the date of signature by the Director.

II.A. Used Oil Transfer Facility Operations

II.A.1. The Permittee is authorized to store 233,860 gallons of used oil, for up to 35 days, as outlined in Table 1 of Attachment 2.

II.A.2. Storage in any other type of container is prohibited.

II.A.3. The Permittee shall only accept shipments (rail or tanker trucks) of used oil from Utah-permitted used oil transporters.

II.A.4. For shipments of bulk used oil, the Permittee shall, within 24 hours of arrival, determine the halogen content of the oil through testing or verification that the transporter delivering the used oil has recorded the halogen content of the used oil on the shipping documents.

II.A.5. For shipments of used oil brought into the Clive facility in containers, totes, and drums, the Permittee shall determine the halogen content of the used oil shipment within 10 days of arrival at the facility and before that used oil is placed in storage in areas other than the 10-Day Pad.

II.A.5.a. The Permittee shall determine the halogen content by collecting a representative sample in accordance with Condition II.D and Attachment 4, then screening the used oil sample for halogens or by submitting the sample to a Utah-certified laboratory for analysis in accordance with the analytical requirements of Attachment 4.

II.A.5.b. The Permittee shall then record the results of the halogen testing, the date of the test, and the initials of the tester on the shipping document prior to shipment from the facility.

II.A.6. The Permittee is not required to further test used oil from a Utah-registered used oil marketer if the marketer provides, at the time of acceptance, analytical data results documenting that the used oil has been tested for the parameters in R315-15-1.2 of the Utah Administrative Code.

II.A.7. The Permittee may accept shipments of used oil in containers, drums, tote tanks, closed-top frac tanks, tanker trucks, and rail cars from used oil transfer facilities, processors/re-refiners and burners with valid EPA identification numbers.

II.A.8. Used oil recovered from oily water shall be managed as used oil in accordance with R315-15 of the Utah Administrative Code and this Permit.

II.A.9. The Permittee shall not accept or store used oil with PCB concentrations greater than or equal to 50 mg/kg (ppm) unless the Permittee complies with TSCA regulations 40 CFR 761. Used oil containing PCB concentrations greater than or equal to 2 mg/kg but less than 50 mg/kg are subject to both R315-15 of the Utah Administrative Code and 40 CFR 761.

II.B. Used Oil Storage Areas and Secondary Containment

II.B.1 The Permittee shall only store used oil in areas and manner as described in Attachment 2 of this permit.

II.C. Used Oil Loading and Unloading Requirements

II.C.1. The Permittee shall secure the vehicle by positioning wheel chocks and the emergency brakes before loading or unloading used oil from transportation vehicles.

II.C.2. The Permittee shall inspect all used oil collection equipment (e.g., vehicles, tanks, and associated pumping equipment) for any damage prior to use.

II.C.3. The Permittee shall place buckets or other containers under piping connections to collect drips of used oil during loading and unloading operations.

II.C.4. The Permittee shall ensure the amount of used oil to be loaded will not exceed the current capacity. The Permittee shall utilize a calibrated gauging instrument.

II.C.5. The Permittee is authorized to transfer used oil between highway vehicles and rail cars or railcars to railcars at a permitted transfer facility in accordance with the rail car loading procedure in Attachment 1.

II.C.6. During loading and unloading operations, a trained operator shall remain at the transfer location and maintain control of the operations throughout the entire used oil transfer.

II.D. Used Oil Sampling and Analysis

II.D.1. The Permittee shall sample and analyze used oil accepted at the facility when required by Condition II.A of this Permit in accordance with the requirements of Attachment 4 (Sampling and Analysis Plan).

II.E. **Used Oil Training**

II.E.1. The Permittee shall train handlers of used oil in accordance with R315-15-4 of the Utah Administrative Code and the requirements of this Permit. New employees may not manage used oil without a trained employee present until used oil training is completed.

II.E.2. Employee training shall include documentation that the following topics were covered: identification of used oil, recordkeeping requirements and facility used oil procedures for handling, transporting, sampling and analysis, emergency response, spill reporting and personal safety.

II.E.3. The Permittee shall provide, at a minimum, an annual used oil-training refresher course for employees handling used oil. Additional training is required if the Permittee changes used oil handling procedures.

II.E.4. The Permittee shall keep training records for each employee for a minimum of three years. Employees and supervisors shall sign and date training attendance sheets to document class attendance.

II.E.5. Employees collecting and performing field halogen testing shall be trained and shall demonstrate competence in collecting a representative used oil sample and testing for halogens using a CLOR-D-TECT® kit prior to fieldwork.

I.F. Spill Response, Remediation, and Reporting

II.F.1. In accordance with R315-15-9.1(a) of the Utah Administrative Code, the person responsible for a spill shall immediately take appropriate action to minimize the threat to human health and the environment. The Permittee shall notify the DEQ Hotline at (801) 536-4123 if the spill is greater than 25 gallons or for smaller spills that pose threat to human health or the environment.

II.F.2. Responders shall take action to prevent a spill from spreading by utilizing absorbent, booms, pads, rags, etc.

II.F.3. Once the material is containerized, a waste determination shall be made to determine the material's disposition.

II.F.4. The Permittee is responsible for the material release and shall recover oil and remediate any residue from the impacted soils, water, or other property or take any other actions as required by the Director until there is no longer a hazard to human health or the environment.

II.F.5. All costs associated with the cleanup shall be at the expense of the Permittee.

II.F.6. The Permittee shall maintain spill cleanup kits in the used oil storage areas.

II.F.7. Facility spill kits shall contain, at a minimum, the equipment listed in Attachment 5 of this permit and shall be inspected weekly.

II.F.8. The Permittee shall report all relevant information, including the amount of waste generated from cleanup efforts, the characterization of the waste (i.e. hazardous or non-hazardous), final waste determination and disposal records. The report shall also include actions taken by the Permittee to prevent future spills.

II.F.9. An air, rail, highway or water transporter who has discharged used oil shall give notice, if required by 49 CFR 171.15, to the National Response Center at http://nrc.uscg.mil/nrchp.html, (800) 424-8802 or (202) 426-2675. In addition to the notification above, a written report, as required in 49 CFR 171.16, shall be presented to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau located in Washington, D.C., 20590.

II.F.10. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

II.G. Facility Closure

II.G.1. The Permittee shall implement the closure plan in Attachment 7, which evaluates the potential impacts of used oil operations on the surrounding soil, groundwater and surface water in accordance with R315-15-11 of the Utah Administrative Code. The Permittee shall be responsible for any cleanup of any used oil contamination that has migrated beyond the facility property boundaries in accordance with R315-15-11(d) of the Utah Administrative Code.

Attachment 1

General Used Oil Operations

DESCRIPTION OF USED OIL PROCESSES

1.0 INTRODUCTION

The Clean Harbors Clive, LLC, "Clive" facility will be used as a transfer facility for on-specification used oil and off-specification used oil. Used oil may be received from Used Oil Generators, Marketers, Collection Centers, or Transporters located within or outside the state of Utah. The primary purposes of the transfer facility will be to consolidate shipments of used oil, provide a location at which railcar size shipments of used oil can be transferred to tanker trucks for shipments to used oil burners, and otherwise facilitate the movement of used oil between the generators or used oil facilities and those facilities that can utilize the used oil for energy recovery. The used oil may be shipped to incinerators, cement kilns, industrial boilers or other burners for energy recovery in accordance with R315-15-6 of the Utah Administrative Code. Oil may be shipped to hazardous waste incinerators for disposal if it is manifested as a characterized waste rather than used oil or meets the requirements of R315-15-6.2(a)(3) UAC.

2.0 USED OIL RECEIPTS

On-specification and off-specification used oil can be received at the Clive facility in containers, drums, tote tanks, closed-top frac tanks, tanker trucks, and rail cars. Small containers of used oil may be transported from the Clive facility to the final destination facility via covered van trucks or may be transferred from small containers into tanker trucks. Tanker truck shipments of used oil received on third party Utah-permitted transporter vehicles may be transferred to closed-top frac tanks for storage or to Clean Harbor's tanker trucks for shipment to the final destination facility.

The primary purposes of the transfer facility will be to consolidate shipments of used oil, provide a location at which railcar size shipments of used oil can be transferred to tanker trucks for shipments to used oil burners, and otherwise facilitate the movement of used oil between the producers and those facilities that can utilize the oil for energy recovery. Shipments of used oil and other types of industrial wastes may pass through the Clive facility for storage and/or consolidation before being sent on to the final destination facility.

3.0 USED OIL OPERATIONS

The Clive facility will be used for the storage of on-specification and off-specification used oil for a period not exceeding 35 days in containers, tanker trucks, and railcars. The facility will consolidate shipments of used oil containers between trailer trucks ("truck to truck transfer"). The facility will also conduct used oil transfer operations between containers and tanker trucks, tanker trucks and tanker trucks, tanker trucks and railcars, and railcars and tanker trucks. As needed, the facility may also do container to container transfer of used oil. The facility will not conduct used oil storage in tanks, nor will it conduct used oil processing, re-refining, or burning.

Used oil storage and transfer will be conducted in the areas of the facility identified in Attachment 2 of this permit. The following provides a general description of the movement of used oil through the facility:

3.1 Railcars

Located outside the facility fence line, is a large expanse of rail track that leads from the facility gate to the Union Pacific Rail Road. This expanse of track is known as the Clive Rail Spur. Railcars containing on-specification and off-specification used oil will be dropped off at the Clean Harbors Clive rail spur to be picked up by the site rail engine and brought inside the facility gate for storage and transfer. No sampling or transfer of material will be conducted at the spur. Railcars shall remain closed at all times while located at the Clive Rail Spur. Railcars containing on-specification and off-specification used oil will be pulled inside the facility fence-line to Area 535, Area 255, or Area 105 for initial inspection, and if required, sampling. Railcars may also be inspected or sampled before being moved to one of these areas. Tanker trucks will be moved into the specific area and the used oil will be transferred from the railcar to the tanker truck using pumps and hoses, or by gravity. Used oil transfer will generally occur within a few days of the railcar arriving on-site. Railcars that are to be stored for an extended period of time, up to the 35 day time limit may be moved inside the buildings located in Areas 255, 535, and 105.

Railcar loading procedures are described in 5.0 below.

3.2 Tanker Trucks and Containers

Arriving tanker trucks will be brought to the facility sampling station for initial inspection, and if required, sampling. Following the inspection, the tanker will be moved to the 10-day pad, if it is likely to be sent off-site within a few days. Tanker trucks that will be stored for an extended period of time, up to the 35 day time limit, may be moved to Areas 106, 105, or 604. Transfer operations between tanker trucks or between tanker trucks and large containers such as closed-top frac tanks, will be conducted in Areas 106, 105, or 604.

Trailer trucks transporting small containers of used oil, (55-gallon drums, totes) will be moved to Areas 101, 106, 105, or 604 and off-loaded. The containers will be inspected, and if necessary, sampled and stored in these areas for up to 35 days. Small containers may be bulked into larger containers such as closed-top frac tanks, or into tanker trucks in these areas as well.

Larger containers such as closed-top frac tanks, may be stored in these areas for up to 35 days.

4.0 SHIPMENTS OF USED OIL

The Clean Harbors Aragonite, LLC facility will be the primary recipient of shipments of used oil from the Clive facility, but shipments may also be made to other Clean Harbors facilities or to third party used oil burners. Tanker trucks will be used to transport bulk quantities of used oil from Clive to the destination facility. Small containers of used oil (55-gal drums or tote tanks) may be transported from the Clive facility to the final destination facility via covered van trucks.

5.0 RAILCAR LOADING/UNLOADING PROCEDURES

All railcar loading/unloading at the Clive facility shall follow the SOP in Appendix 1A below.

Appendix 1A

Bulk Flammable / Non Flammable Rail Loading / Offloading Standard Operating Procedure

Clean Harbors Clive
Facility
Clive, UT

TITLE: Used Oil Rail Loading/Offloading			
Facility: Clive	**Prepared by: Branden Prettyman**	**SOP Number:**	**Page 3 of 5**
Reviewed By: **Eric Grange** **Tyler Lee**	**Title:** **Health and Safety Manager** Environmental Compliance Manager	**Issue Date: 3/18/19** **Revised on: 3/18/19**	
Approved By: **Eric Grange**	**Title:** **Health and Safety Manager**	**Next Review Date: 3/18/20**	

1.0 Objective

This SOP is to provide the guidance and necessary steps to standardize the process of offloading used oil bulk waste streams into OTR tankers. The procedures apply to all personnel who perform these tasks. The procedure below will provide the steps to meet this objective.

2.0 Site Specific Terms

Upon arrival into the Clive facility the loading technician needs to review manifest or bill of lading to ensure the waste is expected and for a designated OTR tanker. The technician also needs to ensure the volume on the manifest and in the tanker will fit into the OTR tanker as well as not be overweight. If switching loading from Non TSCA, TSCA or used oil material, the designated hoses must be used.

Considerations when pumping Flammable / Combustible Material
Never pressure load or off-load flammable / combustible material. Nitrogen should be used instead of air to inert the atmosphere inside the tank. Air pressure in excess of ambient atmospheric pressure may create an air-enriched mixture within the flammability range of the material in the vapor space of the tank. Use aluminum or brass fitting hoses when unloading / loading flammables or combustibles. Stainless and plastic fittings can be ignition sources due to static electricity.

3.0 Responsibilities

General Manager
The General Manager or designee will ensure that all employees are trained and knowledgeable regarding the proper operating procedures for railcar loading.

Supervisors
The supervisor and/or lead foreman or designee for this process is responsible for training, monitoring, and enforcing this procedure with the employees, and for ensuring all equipment and required PPE are available to the employees.

Employees
Employees are responsible for adhering to safe work practices and all provisions found in this procedure. Employees must inspect equipment and report any failures or deficiencies to the appropriate Supervisor.

4.0 Prerequisites

The following prerequisites must be completed prior to performing this procedure.

Health and Safety
- Any incidents, including near misses, are to be reported immediately to the supervisor.
- Review the Job Hazard Analysis to become familiar with the hazards associated with this process.
- Consult the PPE Hazard Assessments to be worn for this job task.
- Any incident, including near miss, is to be reported immediately to the appropriate Supervisor.
- Verify the hand brake is set.
- Ensure the railcar's wheels are properly chocked.
- Ensure grounding strap is attached and continuity test is conducted and verified
- Ensure the appropriate warning sign is displayed and in place.
- Ensure the safety shower/eye-wash station in the area is unobstructed and in good working order.
- If available and/or required, utilize fall protection.
- Operator must carry company phone all the time to keep communication channel open in case of emergency and need help.
- Ensure not to inadvertently mix used oil with hazardous wastes or PCBs by hauling used oil in a contaminated container. Ensure the tanker is RCRA empty as defined in 40 CFR 261.7(b).

Ensure there is record of the container being empty according to R315-261-7 prior to beginning the transfer operation. All cleaning records are to be kept on file at both the Aragonite and Clive facilities.

Environmental
- Follow the appropriate sampling techniques specified within the facility's Waste Analysis Plan.
- Ensure all applicable monitoring equipment is available.
- If an incident occurs, report it immediately to your supervisor, and implement the facility's Contingency Plan, if applicable.
- Facility Air Order Requirements must be considered prior to this operation.
- Incidental releases are to be cleaned up immediately with the process designated PPE.
- Exercise caution to prevent any spills or VOC emissions during the process.
- Report any spills or VOC emissions immediately to the appropriate Supervisor.
- Any spills are to be cleaned up immediately and disposed of properly.
- If there is a breach in containment operator needs to report to facility manager timely to get it fixed.
- In the event of a large spill, the Contingency Plan needs to be implemented.

Documented Training
- HazWoper training
- OSHA regulated substances, as required
- Used Oil training
- RCRA training
- SOP training
- Equipment training
- Job specific training on the appropriate sampling techniques.

Operations

- The employee must check the railcar's number on the paperwork to match the number on a railcar to ensure the correct railcar is designated for offloading operations.
- The employee must ensure that the OTR tanker has adequate capacity to take the used oil in the designated loading tanker. The employee must take calculations to ensure the OTR tanker is not overloaded during filling operations.
- The employee must account heels when doing waste volume calculation after third load. Pay specific attention to the volume of last load to ensure no overfilling.
- Ensure that all preventative maintenance on equipment has been conducted.
- Required equipment:
    - Sampling container
    - Sampling tool (e.g., Coliwasa, sample bottles, pipe wrench, bucket, rope, etc.)
    - Paper towels or rags
    - Manway seals

5.0 Procedure

5.1 Receiving

All waste entering the Clive site must be accompanied with manifest or bill of lading and properly identified before any processing can begin. The employee must verify information on manifest matches the load.

- The following information must be included on the shipping document
    - Shipping facility EPA ID number
    - Container type and count
    - Weight of the material shipped
        - The weight must be checked for a significant discrepancy. If the amount received is more than 10% different from the amount on the shipping document, this will need to be corrected on the shipping document.
    - All transporter signatures, transporter dates, and EPA ID numbers.
    - Screen results must be noted on shipping document for used oil being transferred through Utah.

Note:

Only transporters approved as used oil transporters in the State of Utah may haul used oil in Utah.

5.2. Pre-Operational Inspections

- Inspect the equipment to be used to access the railcar for loading / offloading (e.g., hoses, fittings etc.).
- Inspect the following process control equipment (e.g., fire suppression, etc.) to ensure it is ready for use for the day:
    - Portable fire extinguishes
    - Eye wash stations
    - Appropriate calibration and/or bump tests are conducted for air monitoring equipment.
    - Check railcar heels. Report it to operation manager and shipping crew.
    - Report and update railcar status every morning to proper supervisor and managers.

5.3. Procedure and Loading / Offloading Operation

5.3.1 Procedure

1. Verify the hand brake is set.
2. Place the wheel chocks on the front and back of a railcar wheel.
3. Place the Blue Flag 50 feet in front of rail car.
4. Ground the railcar using a ground cable that is securely connected to a clean metal portion of the railcar.
5. If the railcar has to be sampled, use the following steps.

    a. Sampling personnel must review the manifest and don the appropriate PPE.
    b. Look at the manway as you stand on the top of the railcar. The standard manway for a general-purpose non-pressure railcar is a 20-inch hinged and bolted design. The hinged and bolted manway has a hinge on one side and 6 or 8 eyebolts equally spaced around the cover for securement to lugs welded to the manway nozzle.
    c. Start at the hinged side of the dome and loosen the eyebolts by turning them counter-clockwise. With your head and body away from the manway, remove the last two eyebolts from the manway and open the lid.
    d. Collect the sample and secure the manway. Submit sample to the lab with sample date and railcar number.
6. Review gallons on manifest to ensure OTR tanker has adequate space.
7. When loading or offloading a rail tanker or OTR tanker,
    a. Personnel shall don the appropriate PPE
    b. Personnel shall install and verify that the grounding and bonding wire is attached to the railcar/OTR tanker before making connections and work begins.
8. The Operator must visually inspect all lines and fittings before and after use and replace any defective equipment.
9. Set truck parking brake and chock both sides of one wheel of the truck to prevent accidental movement.
10. Ensure adequate spill response equipment is readily accessible per procedures in Attachment 4.
11. Prior to railcar loading, fill out the Railcar Used Oil Transfer Log when applicable.
12. Take a beginning reading on the truck to determine the volume to be transferred.
13. <u>Two operators with knowledge of loading and offloading procedures must be present during loading or off-loading of any rail car.</u> One person must remain on top of the railcar and one person must remain at the tank truck connection point at all times during the transfer.
14. Unsecure railcar manway/top hatch by removing I-bolts using a pipe wrench.
15. **If loading railcar-** Open manway/top hatch and take a beginning reading on the railcar by using a tape measure and verifying the current railcar measurements with the railcar strapping chart to ensure there is enough space available for transfer.
16. Hoist opposite end of hose up to the railcar hatch, uncap hose end, and insert into the railcar. The top man must hold the hose in place while the transferring or a fill lid must be used.
17. Secure hose to the side of the railcar.
18. Begin the valve alignment, starting from the receiving vessel first. The last valve opened will be on the loaded vessel.
19. Open the fill valve on the receiving tanker.
20. Check the cam locks gaskets for integrity and secure the cam lock ears down.
21. Open the appropriate valves and begin the unloading/loading process to the receiving railcar or OTR tanker.
22. Proceed with transfer operations.
23. Monitor the level of the receiving railcar / OTR tanker while filling. It is extremely important to pay specific attention, not to over fill railcar or OTR tanker that could result in a release.
24. Stop railcar loading / offloading immediately if there is an over flow or any reaction - fuming, gas release, bubbling.
25. If dome lid is not in use the top man shall notify the second operator immediately if the railcar appears to be filling to a level higher than expected so the operation can be stopped.
26. After transfer is complete, clear the hose of any material.
27. Cap and plug all hoses to prevent drips.
28. Close and secure the railcar hatch unless dome lid is in use.
29. Complete all necessary shipping documentation and checklists.
30. Ensure all tank files are updated after each transfer is completed.
31. Clear area of all safety equipment and clean area of any spills or drips prior to departing the transfer area.
32. Remove railcar chocks and truck chocks once the transfer has been completed and equipment is ready to be moved.
33. Ensure proper placards are in place. (Must have Used Oil stickers on both sides of the OTR tanker once loaded.)

5.3.2 Shipping Documentation requirements

1. When preparing a load for shipment, the following must be included with the outbound shipping document:
2. Shipping and receiving facility name, address, and EPA ID number.
3. Container type and count
4. Weight of material being shipped in pounds or gallons
5. All transporter signatures, dates, and EPA ID numbers.
6. If the material is being marketed, a note indicating if the material meets on or off spec used oil and a cross reference to the analytical data to support how the material is marketed.

5.3.4 Process Interruptions

The Operator will immediately secure all loading/unloading operations in the event of a line rupture or fire.

- Secure the unloading valve on the railcar if safe to do so. If unable to secure the unloading valve on the railcar, close any valves downstream from the railcar to the receiving tank. Notify the appropriate Supervisor immediately.
- The appropriate Supervisor may opt to initiate the facility's Contingency Plan in the event of a fire or spill.

The following process interruptions may occur during loading/offloading operations:

- Strong exothermic reaction or fire
- Excessive odor or irritation
- Physical boiling or popping
- Fuming or off gassing
- Spill
- Chemical Exposure

Should any of the reactions noted above during the operations, personnel are to:

1. Contact the Supervisor immediately.
2. The Supervisor is responsible for contacting the Primary Emergency Coordinator, Health and Safety Manager, and Environmental Compliance Manager.
3. Ensure all equipment is turned off and secured.

6.0 In addition to the process interruptions which can occur, the following additional consequences of deviations could result:

- Injuries and/or fatalities
- Property damage
- Regulatory violations and/or fines
- Damaged public relations and/or customer relations
- Disciplinary actions up to and including termination

Attachment 2

Used Oil Containment Areas

INTRODUCTION

This attachment describes the areas of the Clean Harbors Clive, LLC (Clive) facility in which used oil can be stored.

USED OIL CONTAINMENT AREAS

Please refer to the facility maps provided in Attachment 3 of this permit. Table 1 at the end of this attachment identifies the areas that will be used to store and transfer containers of off-specification and on-specification used oil. The table describes the maximum storage capacity of the areas and the types of containers that will be held within the areas. Containers of used oil will be held in these areas and the Clive Rail Spur for no more than a total of 35 days.

Units 535 and the railyard will be used primarily for sampling railcars when they arrive on-site. Depending upon the length of time it takes to conduct the sampling and run any required analysis, railcars will likely be held in Area 535 for more than 24 hours. Railcars will not be stored in Area 104 in excess of 24 hours. In general, railcars will be off-loaded within 10 days of being pulled inside the facility fence line.

SECONDARY CONTAINMENT

Area 535

The secondary containment system of the Rail/Truck Tanker Transfer Unit has been designed to facilitate sound container management practices and prevent the release of used oil into the environment. Drawings 43-53-4-J07 and 43-53-2-J01 in Attachment 3 provide plan and section views of the bay and the containment system design.

The rail side of the Rail/Truck Tanker Transfer Unit is sloped at a nominal 1/4 inch per foot to two sumps each of which is 14 feet long by 3 feet wide by 3 feet 6 inches deep (minimum). The tanker truck side of the Rail/Truck Tanker Transfer Unit is sloped at a nominal 1/2 inch per foot to one sump in the center of the bay which is 14 feet long by 3 feet wide by 3 feet 6 inches deep (minimum).

Area 255

The secondary containment system of the Rail to Trailer Transload Building has been designed to facilitate sound container management practices and prevent the release of used oil into the environment. Drawings 43-25-3-D020 and 43-25-3-D021 in Attachment 3 provide plan,

elevation and section views of the building and the containment system design.

Area 101

The secondary containment system of the Truck Unloading building (Unit 101) has been designed to facilitate sound container management practices and prevent the release of used oil into the environment. Drawings 43-10-4-J01 and 43-10-4-J02 in Attachment 3 provide plan and section views of the unit and the containment system design.

The aisle ways of the Truck Unloading building (Unit 101) is sloped at a nominal 1/4 inch per foot to 7/32 inch per foot to two sumps in each aisle each of which is 6 feet long by 3 feet wide by 3 feet 8 inches deep (minimum). The north and south ends of the Truck Unloading building is sloped at a nominal 1/4 inch per foot to one sump in the center of the bay which is 2 feet long by 2 feet wide by 2 feet deep (minimum).

The building consists of a total of 56 blind sumps, with 7 bays and 3 aisle ways per bay.

Area 105

The secondary containment system of the Thaw Unit has been designed to facilitate sound container management practices and prevent the release of used oil into the environment. Drawings 43-10-4-J10 and 43-10-2-J05 in Attachment 3 provide plan, elevation and section views of the building and the containment system design.

The floor of the Thaw Unit is sloped at approximately 1/8 inch per foot to four separate sumps. The storage areas are completely enclosed to prevent run-on of rain or dispersion of used oils by wind. Used oil will only be placed in the Thaw Unit after review of manifest information to confirm that the used oils are compatible with other waste.

Area 106

The secondary containment system of the Containerized Bulk Solids Storage Unit has been designed to facilitate sound container management practices and prevent the release of used oil into the environment. Plan, elevation and section views of Unit 106 and the containment system design are shown on Drawing 43-10-2-D61, sheets 4 - 8 and 10 - 12 in Attachment 3

The floor of each subunit within the Containerized Bulk Solids Storage Unit is sloped (1% to greater than 1.5% - see Drawing 43-10-2-D61 sheets 5 and 12 in Attachment 3 for details) toward the outside perimeter berms. Most containers are equipped with legs that support the body of the containers a minimum of six inches above ground level. If a container is not equipped with legs (six inch minimum), another method will be used to elevate the container. Other methods may include placing railroad ties, pallets, or grating beneath the container. The elevation of each container, in combination with the drainage provided by the slope of the concrete floor, will prevent contact between the accumulated liquid and the body of each container. Small containers (e.g., 55 gallon drums) of used oil will only be stored in the enclosed portion of Subunit 1 and will not be stacked more than two high.

Area 604

The secondary containment system of the Truck Wash has been designed to facilitate sound container management practices and prevent the release of used oils into the environment. Drawings 43-60-2-J04 and 43-60-4-J08 in Attachment 3 provide plan and section views of the bay and the containment system design. A total of 1100 ft^3 of containment capacity is available which is greater than the largest container, 30 yd^3, which may be stored in the unit at any time.

Removal of Liquids from Containment Systems

The floor of the Unit 106 is sloped (1% to greater than 1.5%) in all container storage areas and access aisles. This slope will facilitate the detection of leaks, causing any used oil which might leak from a container to migrate down the slope to the perimeter areas. Liquid, which accumulates in the secondary containment system will be collected (e.g., vacuum truck, portable pump, etc.), characterized, and managed appropriately.

The floor slope of 1/8 to 1/2 inch per foot provided in all other container storage bays, access corridors and processing areas will facilitate the detection of leaks causing any liquid which might leak from a container to migrate down the slope to a containment sump.

When an inspection reveals liquid within the sump, the source of the leak will be identified. The identification of the location of a leak may be accomplished in a number of ways, using a variety of inspection techniques. Visual inspection of the condition of containers, localized staining or leakage adjacent to a particular drum, rocking of containers to determine if volume has been lost are techniques which are most likely to be employed to trace the source of a leak. If these measures fail, a sample of the liquid in the sump will be analyzed for a range of characteristics based upon the possible contents of the containers in the containment area. This process should identify the used oil stream that has leaked. All the containers of that used oil stream would then be checked for leaks.

Used Oil from the leaking container will be transferred into a clean container, or the container and its contents will be transferred into an overpack. Liquid in the sump will be transferred from the sump to a clean container via a portable pump. Other suitable methods using absorbents, vacuum systems, etc. may also be used to manage spills. Any container into which used oils are transferred will be appropriately labeled as to the type of material stored in it and managed in the same manner as was specified for the container from which the used oil originated. In the unlikely event that the material cannot be traced back to a specific container or group of containers, a sample will be analyzed to permit proper definition of the management protocol necessary for the used oil. Minor leakage which does not flow to a sump will be absorbed, collected and placed in an appropriately labeled container

Table 1

Used Oil Containment Areas

Area Number	Area Identification	Maximum Volume of Used Oil (gals)	55-Gallon Drum Equivalents[1]
101	10 Day Transfer Building	5,000	91
105	Thaw Unit	60,000	1,091
106	Containerized Bulk Solids Storage Unit	2,500	45.5
255	Rail to Trailer Transload Bldg.	0	0
535	Rail/Truck Transfer Bay	23,560	430
604	Truck Wash Bay	15,000	273
--	Clive Rail Spur	120,000	2,182
--	10 Day Pad	7,800	142

Notes:

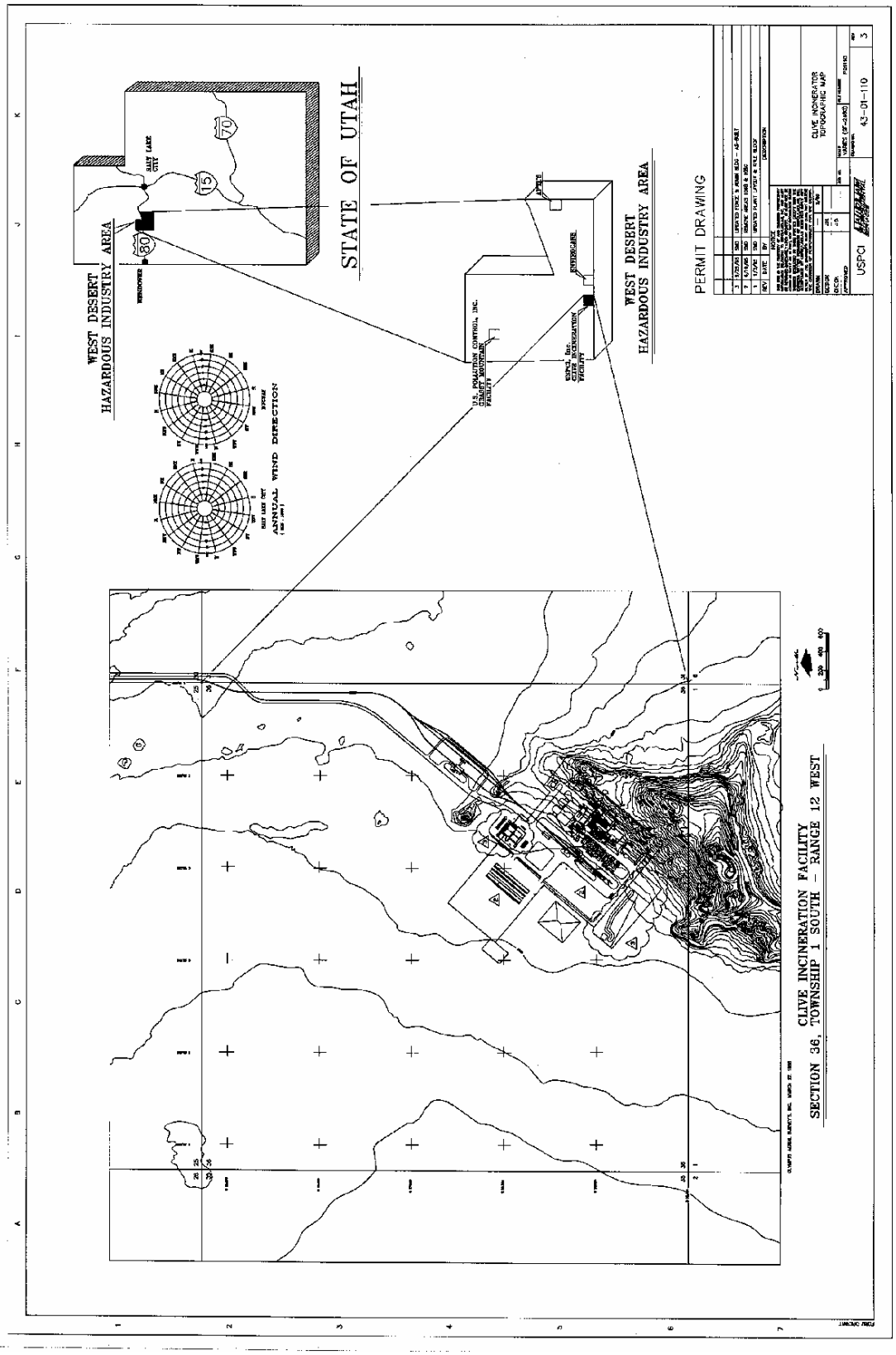
1) Various types of containers will be stored in these areas. The values indicated are the maximum number of 55-gallon drums that could be stored in the Area based on the maximum volume that the particular Area could store. To determine the equivalent number of bulk containers able to be stored, the Maximum Volume in gallons should be divided by the typical bulk container volume (in gallons) provided below.

Typical Bulk Container Volumes (gal)

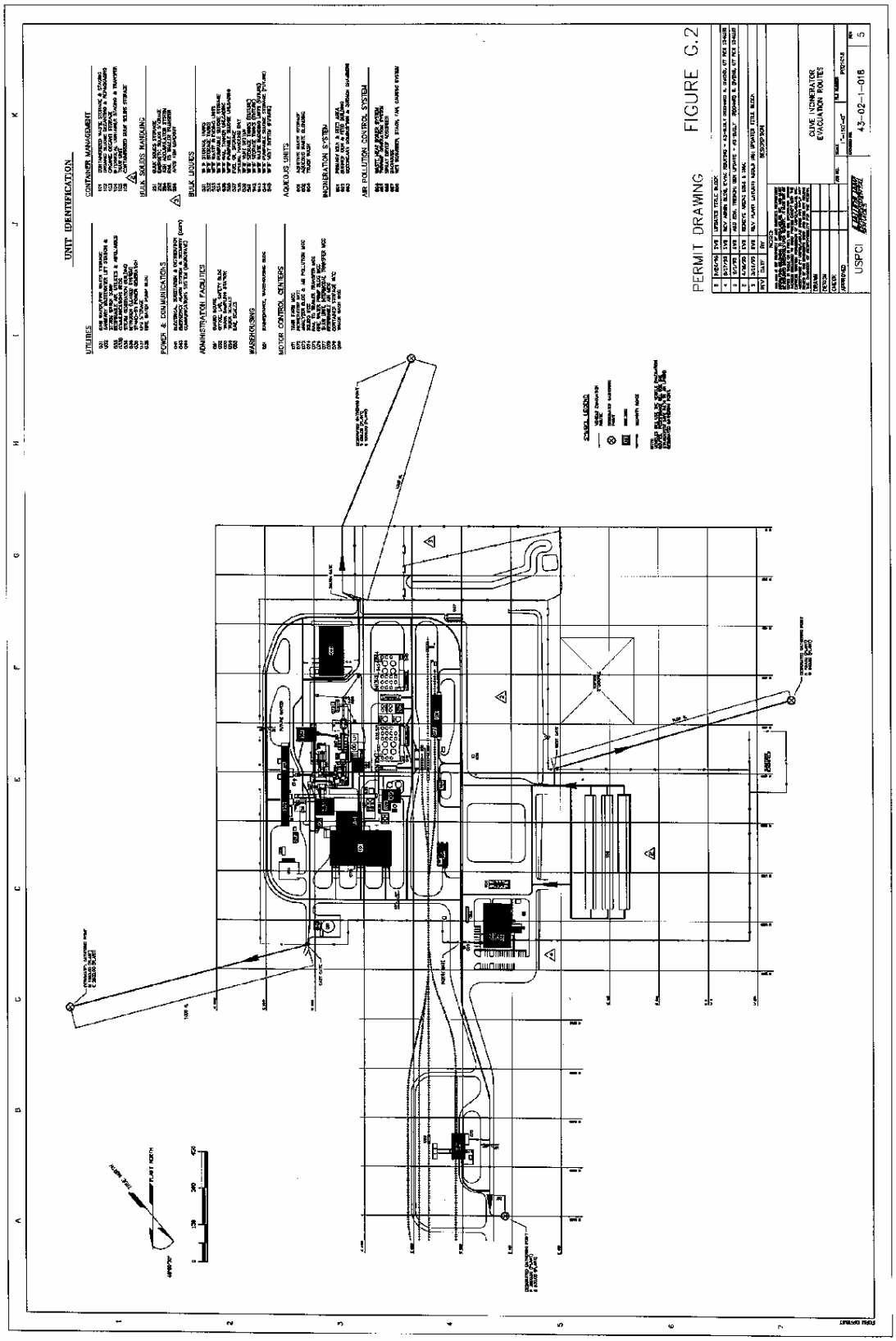
Railcar	20,000
Tanker	5,000
Frac Tank	27,500

Attachment 3

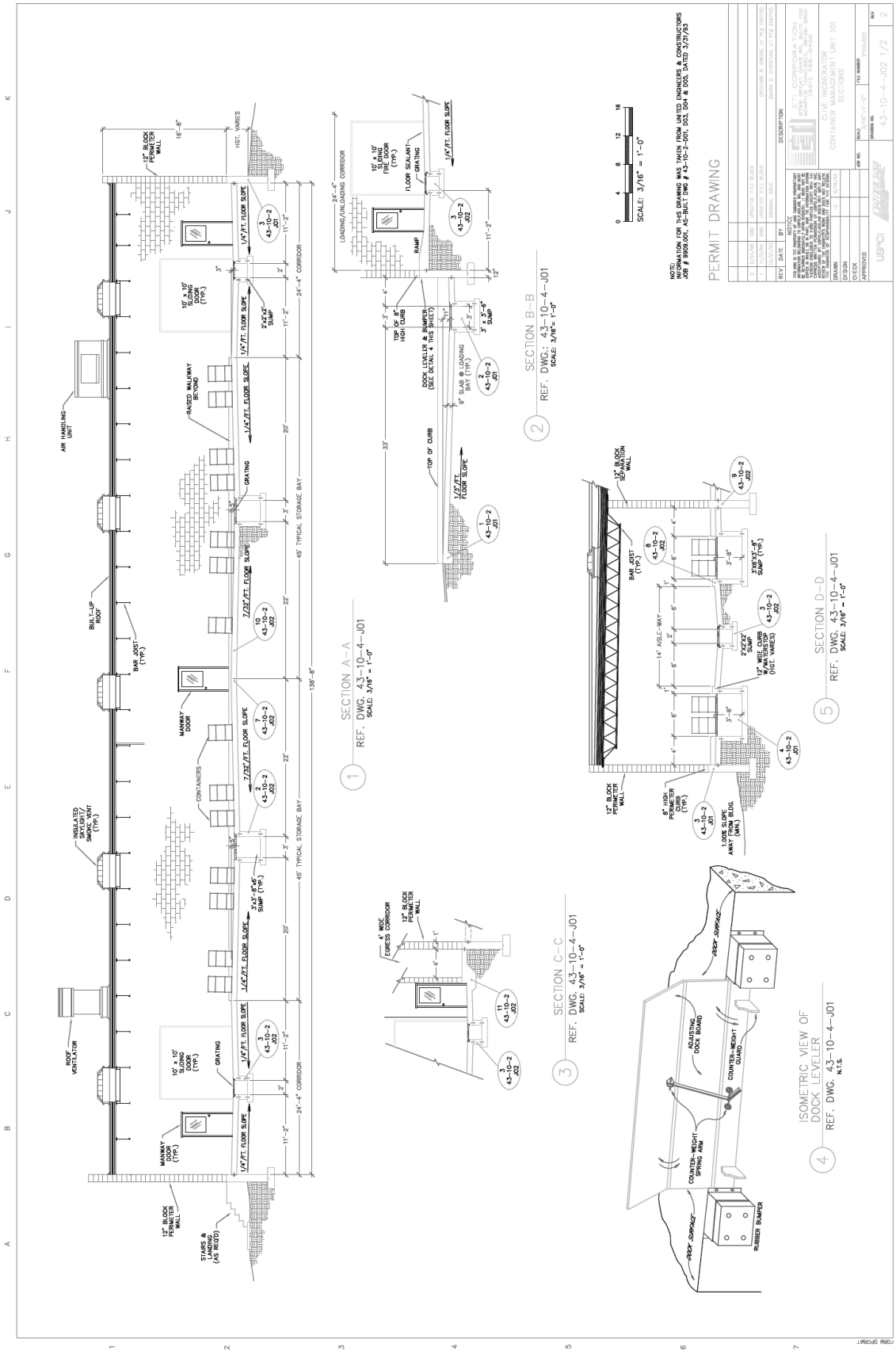
Drawings



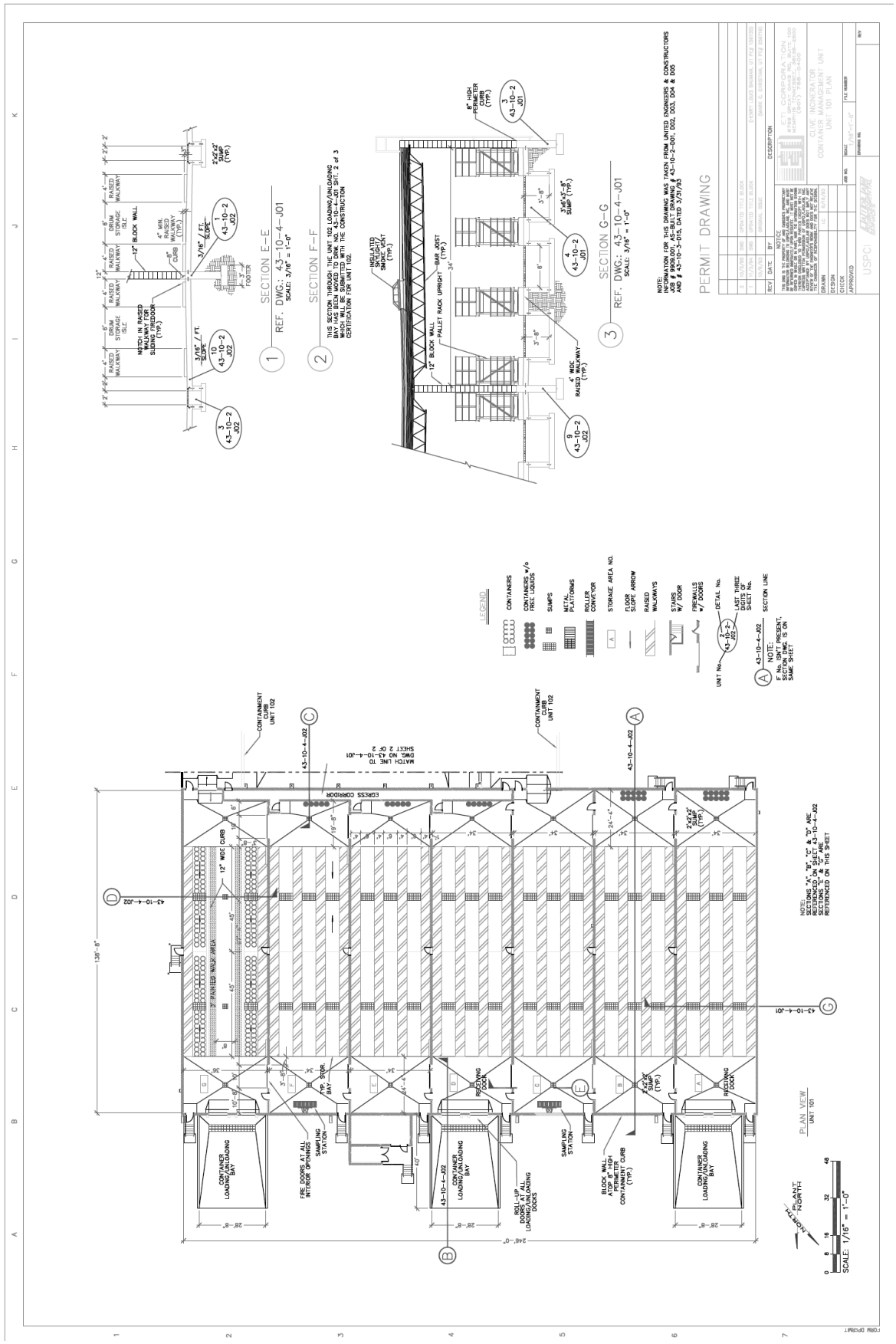
Site Plan Overview



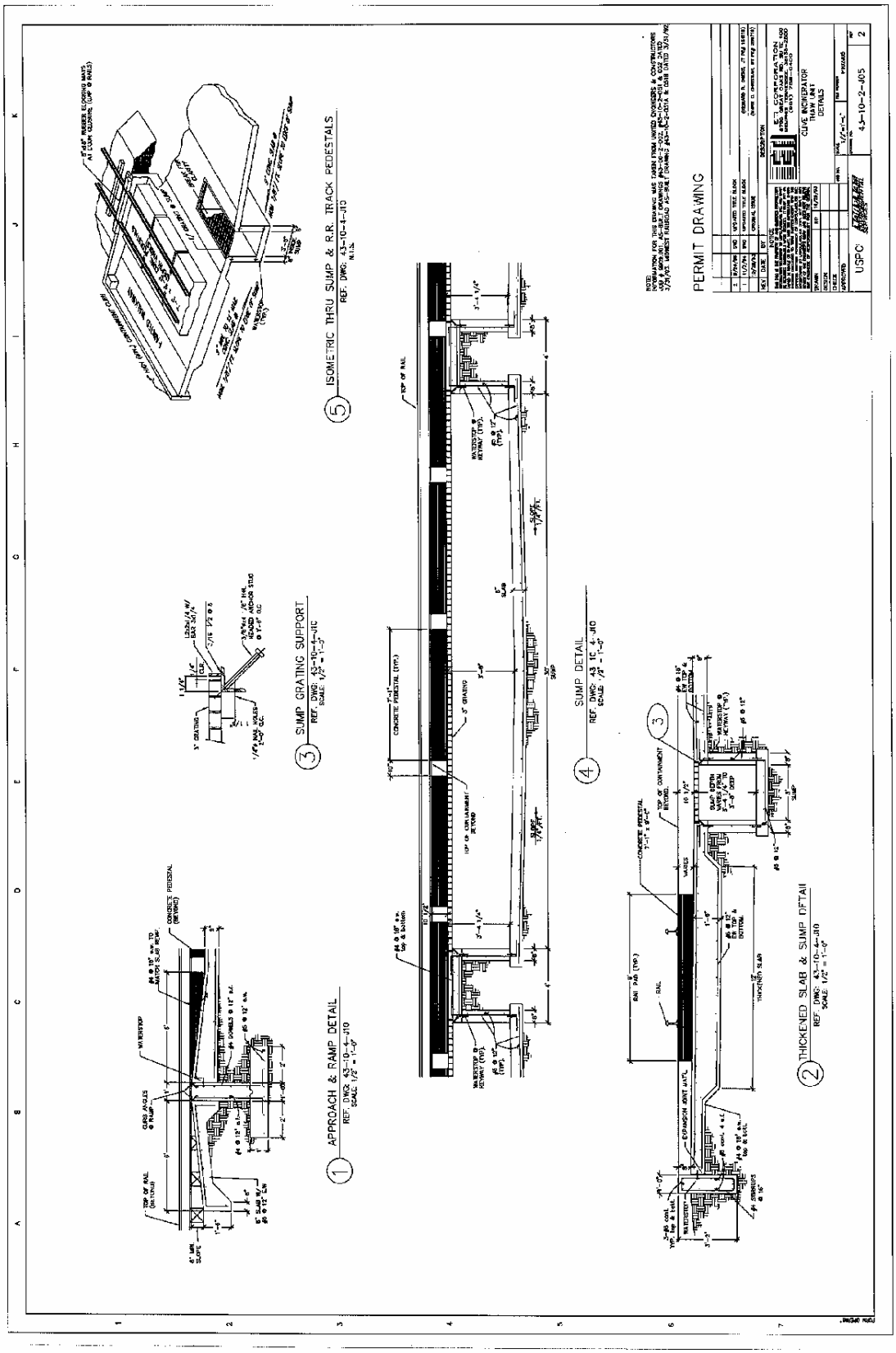
Site Plan Overview


PERMIT DRAWING
SECTION A–A
REF. DWG. 43–10–4–J01
SECTION B–B
REF. DWG. 43–10–4–J01
SECTION C–C
REF. DWG. 43–10–4–J01
SECTION D–D
REF. DWG. 43–10–4–J01
ISOMETRIC VIEW OF DOCK LEVELER
REF. DWG. 43–10–4–J01
CLIVE INCINERATOR
CONTAINER MANAGEMENT UNIT 101
SECTIONS
43–10–4–J02 1/2

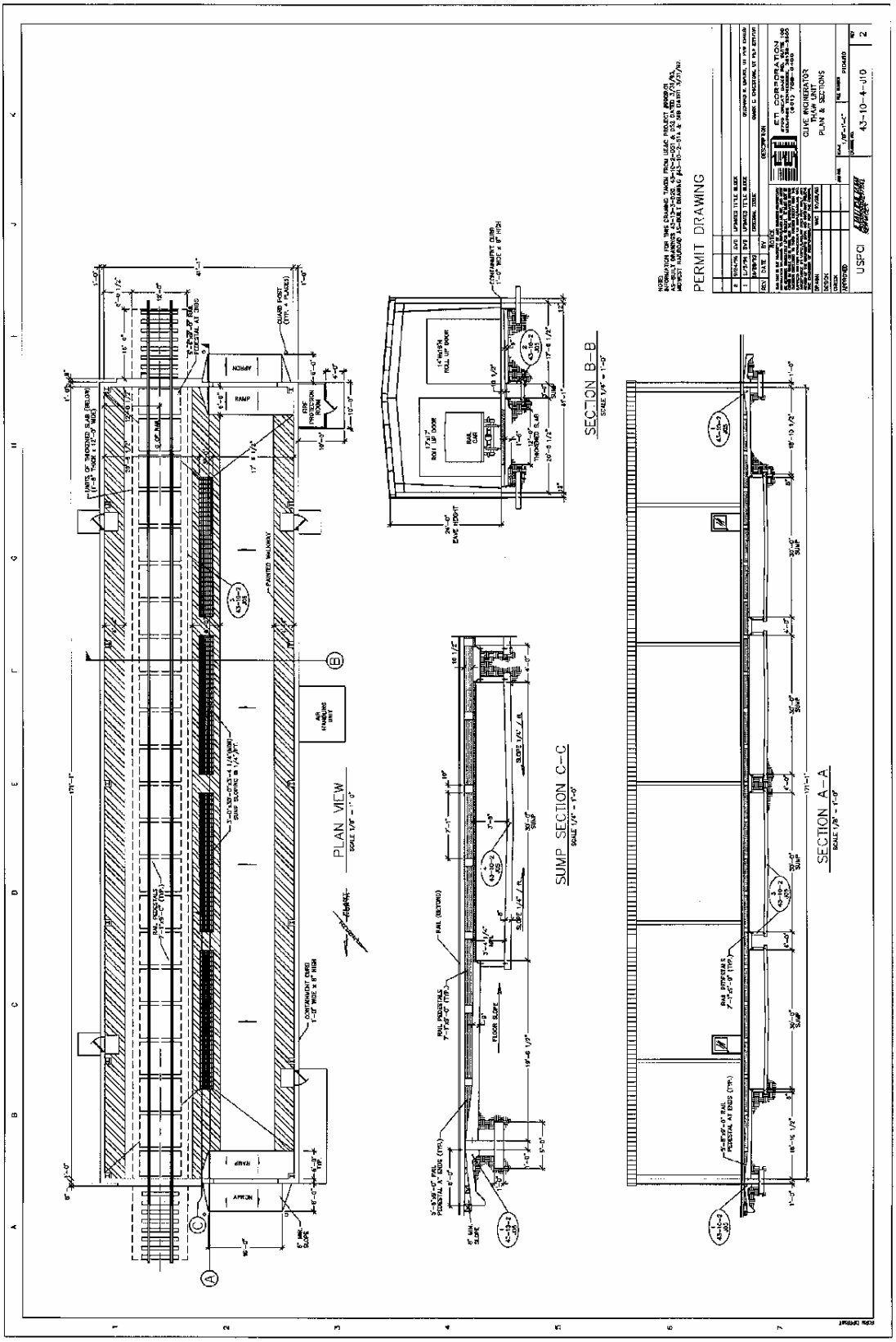
Area 101


SECTION E–E
REF. DWG.: 43–10–4–J01
SCALE: 3/16" = 1'–0"
SECTION F–F
THIS SECTION THROUGH THE UNIT 102 LOADING/UNLOADING WALKWAY WAS NOT INCLUDED IN DWG. NO. 43-10-4-J01, 2 of 3 WHICH WILL BE SUBMITTED WITH THE CONSTRUCTION CERTIFICATION FOR UNIT 102.
SECTION G–G
REF. DWG.: 43–10–4–J01
SCALE: 3/16" = 1'–0"
NOTE:
INFORMATION FOR THIS DRAWING WAS TAKEN FROM UNITED ENGINEERS & CONSTRUCTORS AIS # 9606-001, AS-BUILT DRAWING # 43-10-2-001, 002, 003, 004 & 005 AND # 9610-2-01-01, DATED 1/20/94
PERMIT DRAWING
CLIVE INCINERATOR
CONTAINER LOADING/UNLOADING UNIT
UNIT 101 PLAN
LEGEND
CONTAINERS
CONTAINERS w/o FREE LIQUIDS
SUMPS
METAL PLATFORMS
ROLLER CONVEYOR
STORAGE AREA NO.
FLOOR SLOPE ARROW
RAISED WALKWAYS
STAIRS W/ DOOR
FIREWALLS W/ DOORS
DETAIL No.
LIST THREE DIGITS TO SHEET No.
SECTION LINE
NOTE: IF No. IS PRESENT, SECTION DWG. IS ON SAME SHEET
NOTE: SECTIONS "A", "B", "C" & "D" ARE REFERENCED ON SHEET 43-10-4-J02 SECTION "E" & "F" ARE REFERENCED ON THIS SHEET
PLAN VIEW
UNIT 101
SCALE: 1/16" = 1'–0"
PLANT NORTH
CONTAINMENT CURB UNIT 102
MATCH LINE TO DWG. NO 43-10-4-J01 SHEET 2 OF 2
EGRESS CORRIDOR
12" WIDE CURB
CONTAINER LOADING/UNLOADING BAY
FIRE DOORS AT ALL INTERIOR OPENINGS
SAMPLING STATION
ROLL-UP DOORS ALL LOADING/UNLOADING DOCKS
BLOCK WALL ATOP 8" HIGH PARAPET CONTAINMENT CURB (TYP.)
PACKING DOCK
2'x2'x2' SUMP (TYP.)
43-10-4-J01
43-10-4-J02
245'-0"
28'-6"
135'-8"

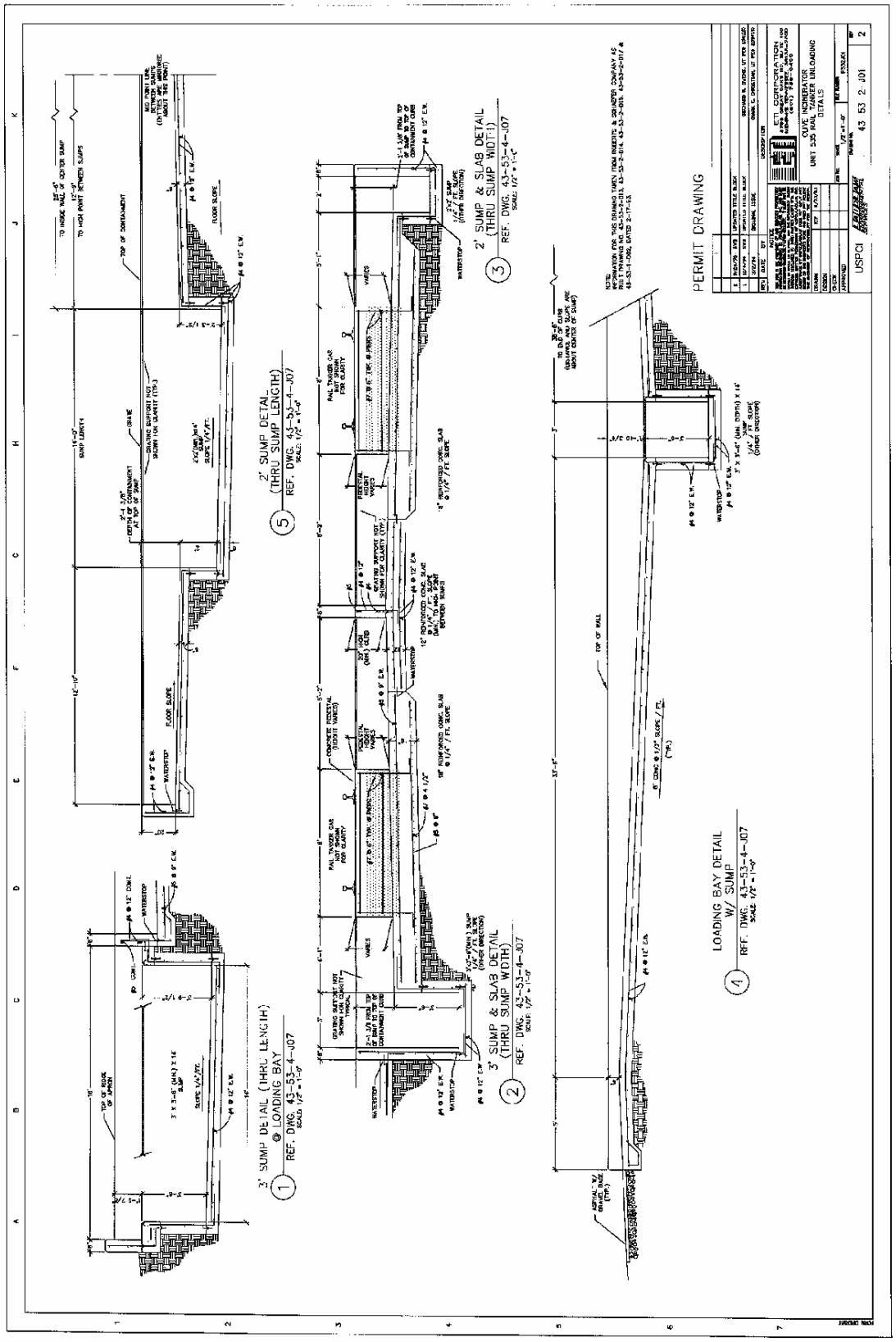
Area 101



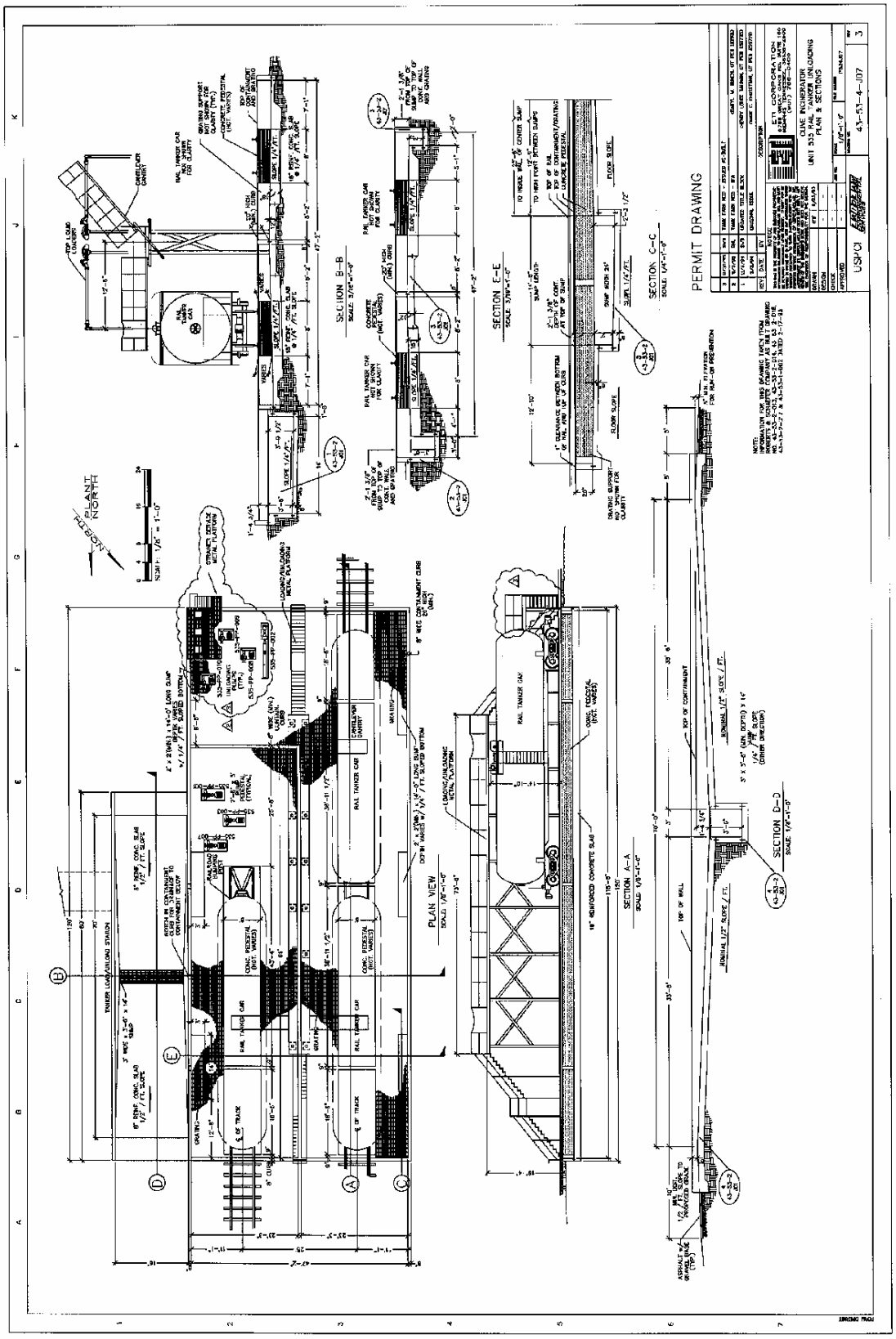
Area 105 -- Thaw Unit



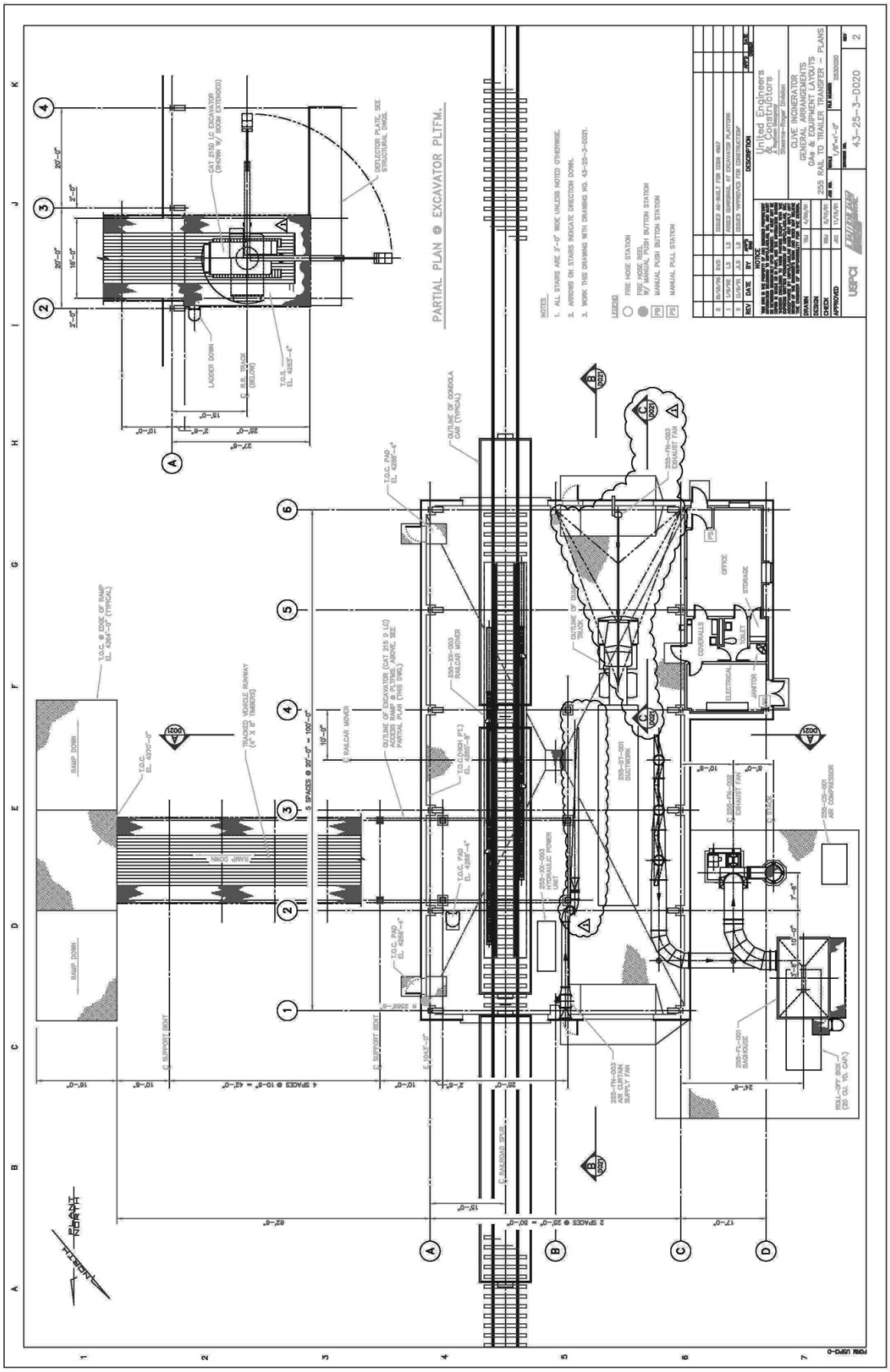
Area 105 -- Thaw Unit



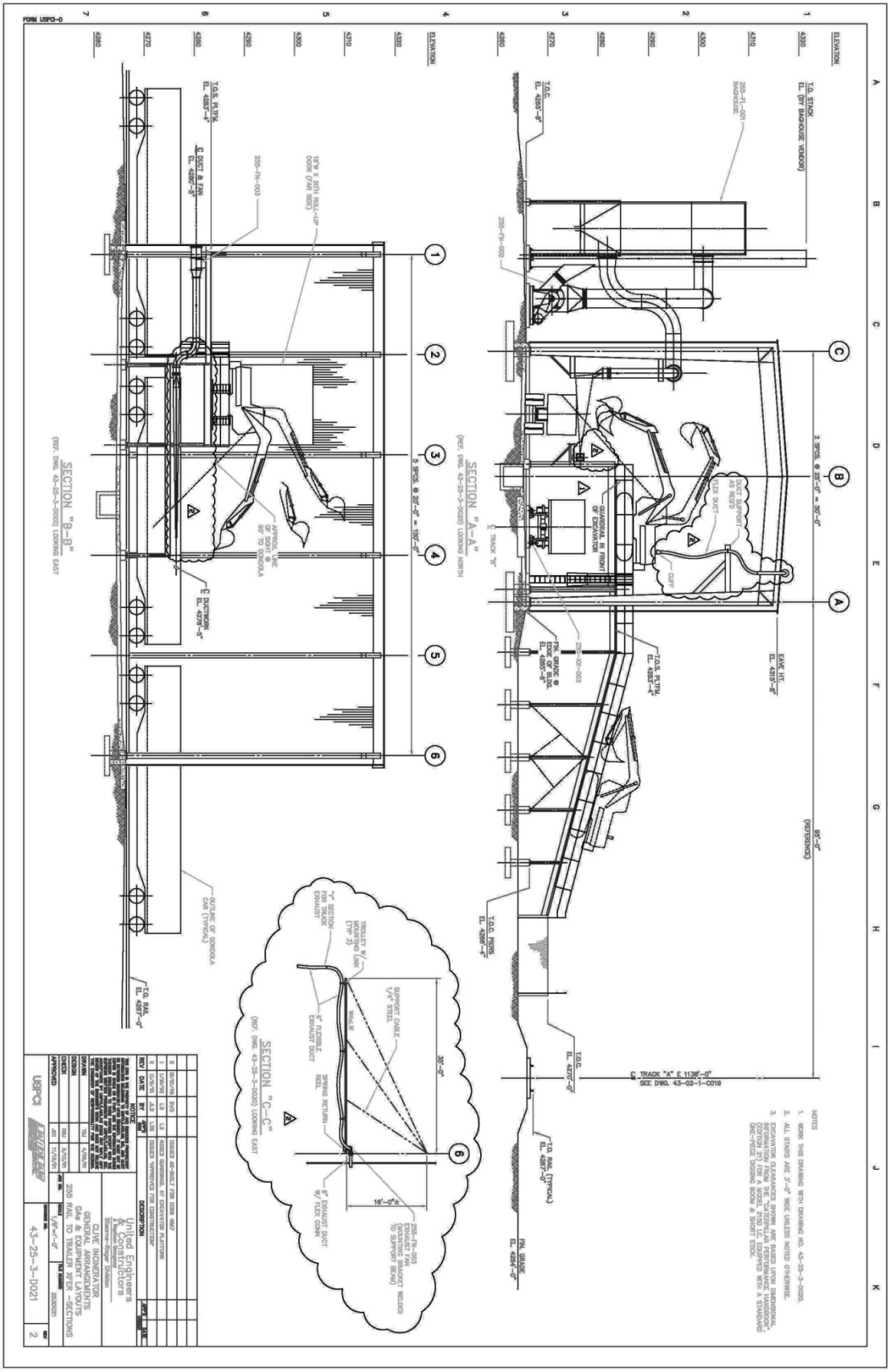
Area 535 -- Rail/Truck Tanker Transfer Unit



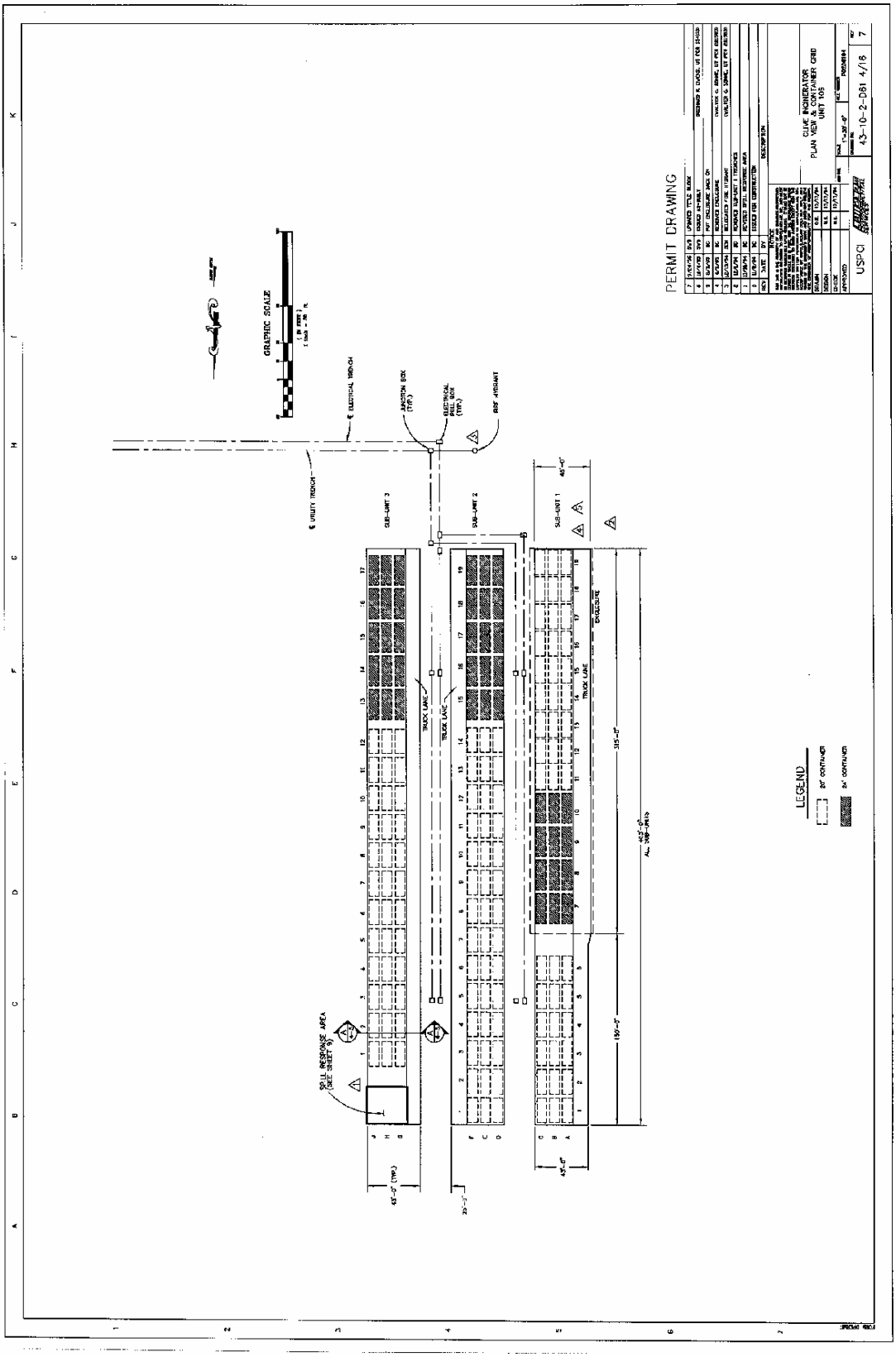
Area 535 -- Rail/Truck Tanker Transfer Unit



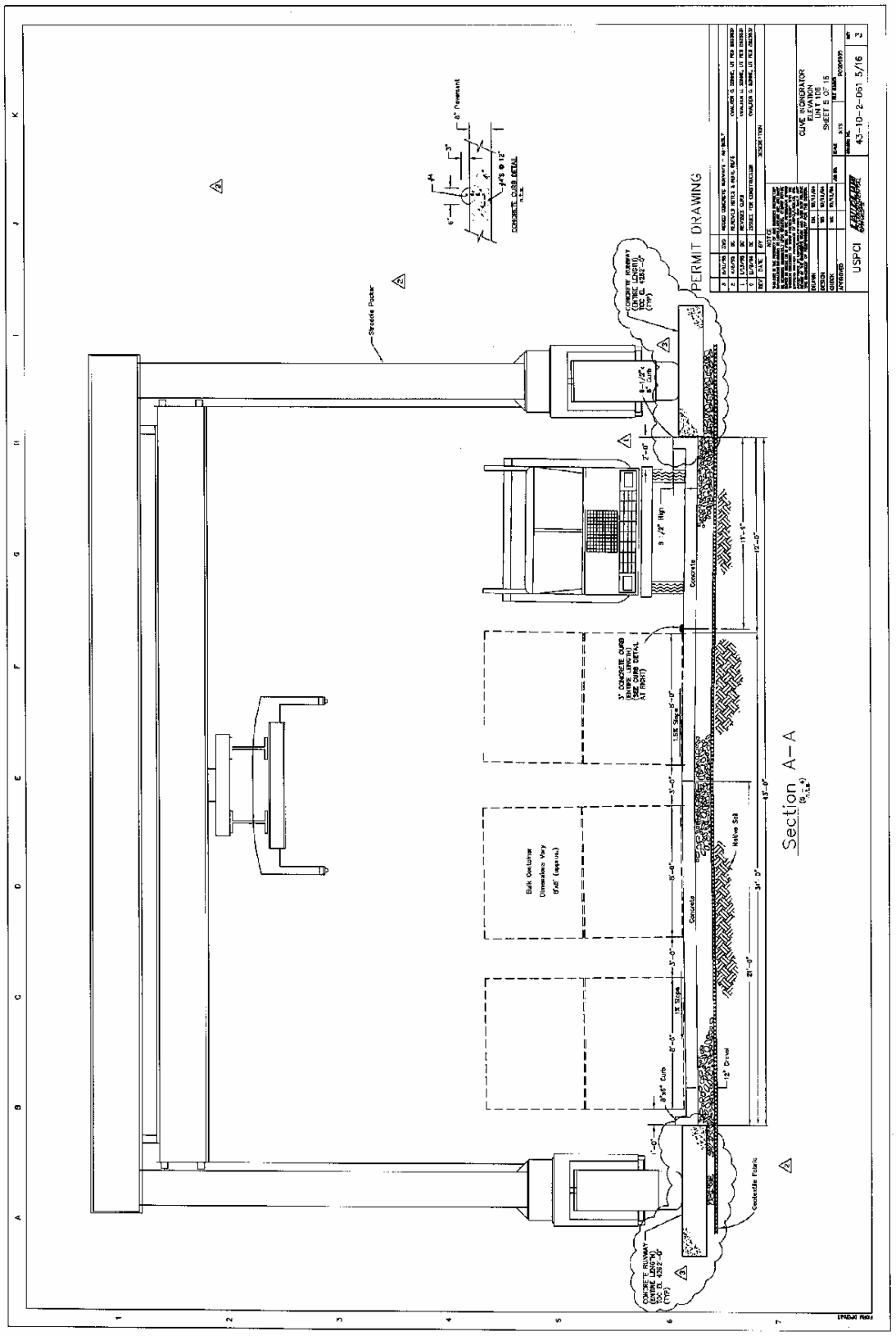
Area 255 -- Rail to Trailer Transload Building



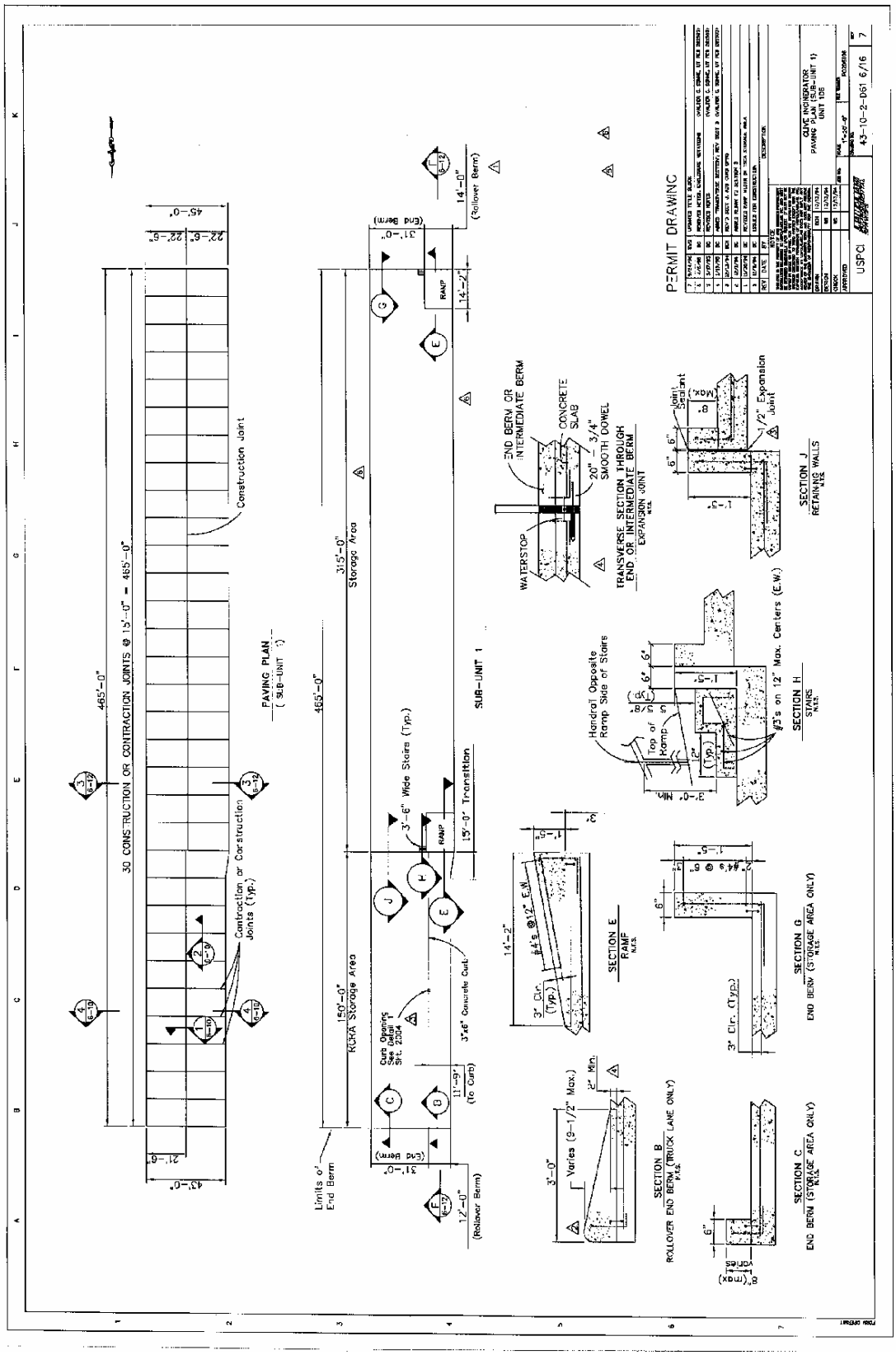
Area 255 -- Rail to Trailer Transload Building



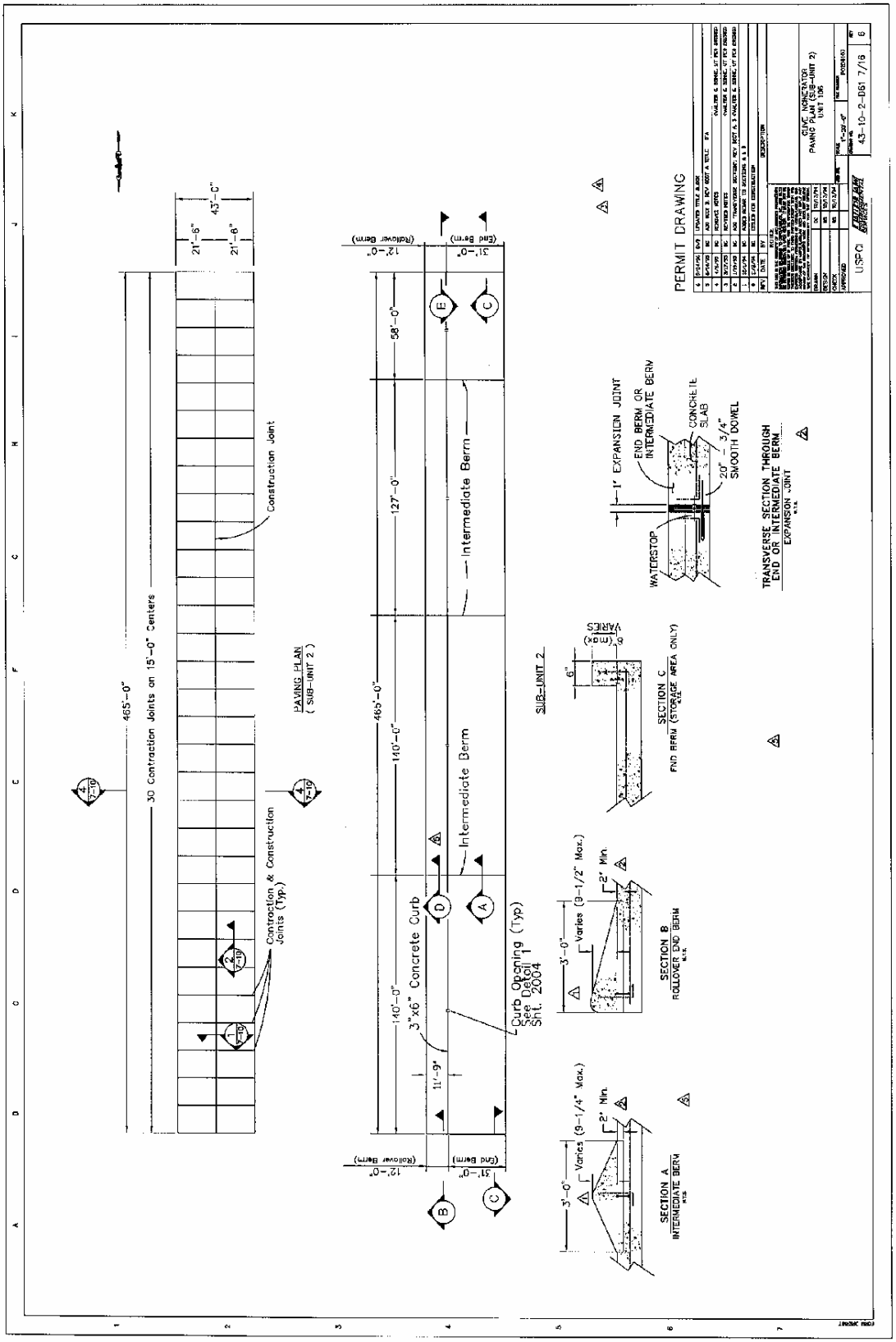
Area 106 -- Containerized Bulk Solids Storage Unit



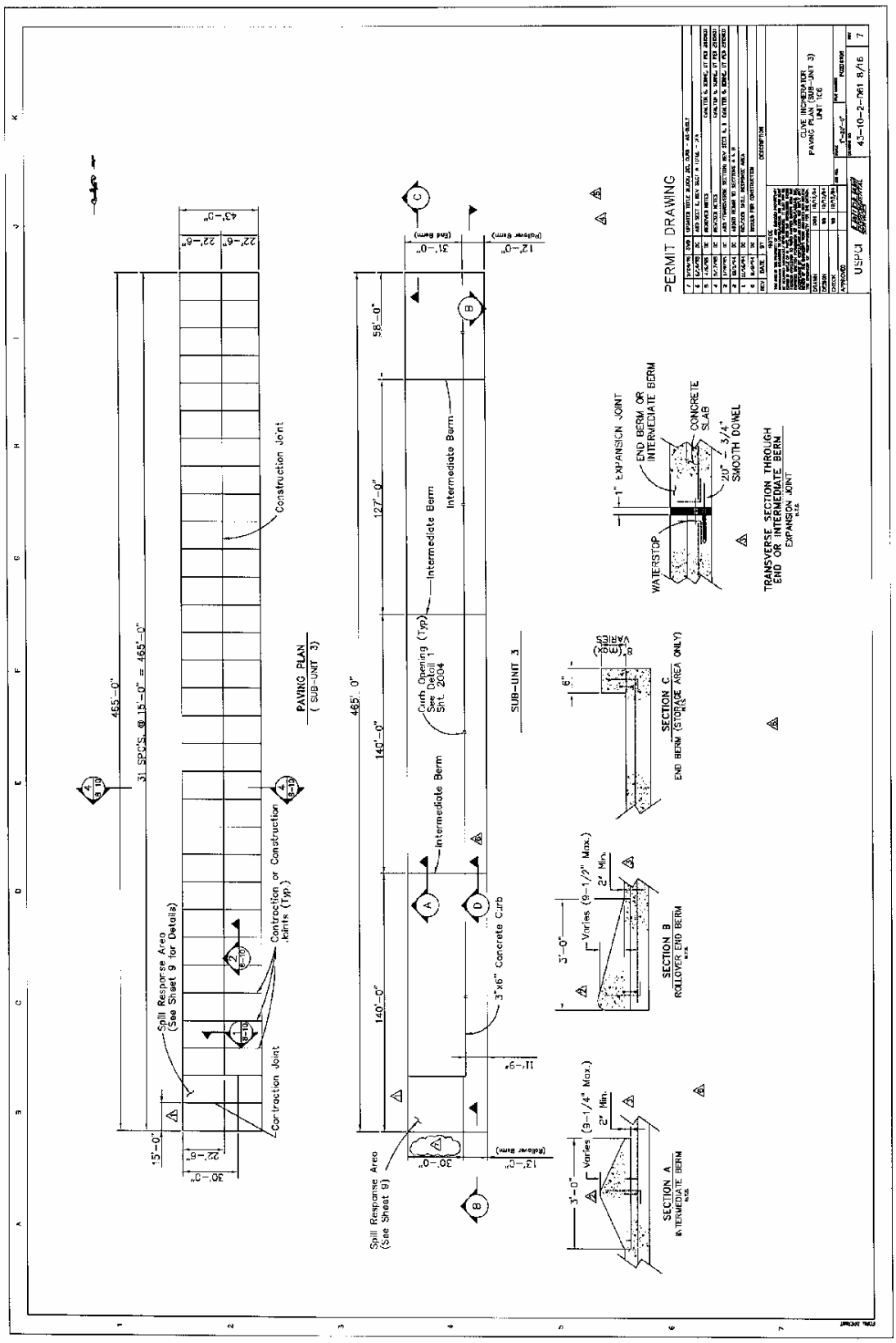
Area 106 -- Containerized Bulk Solids Storage Unit



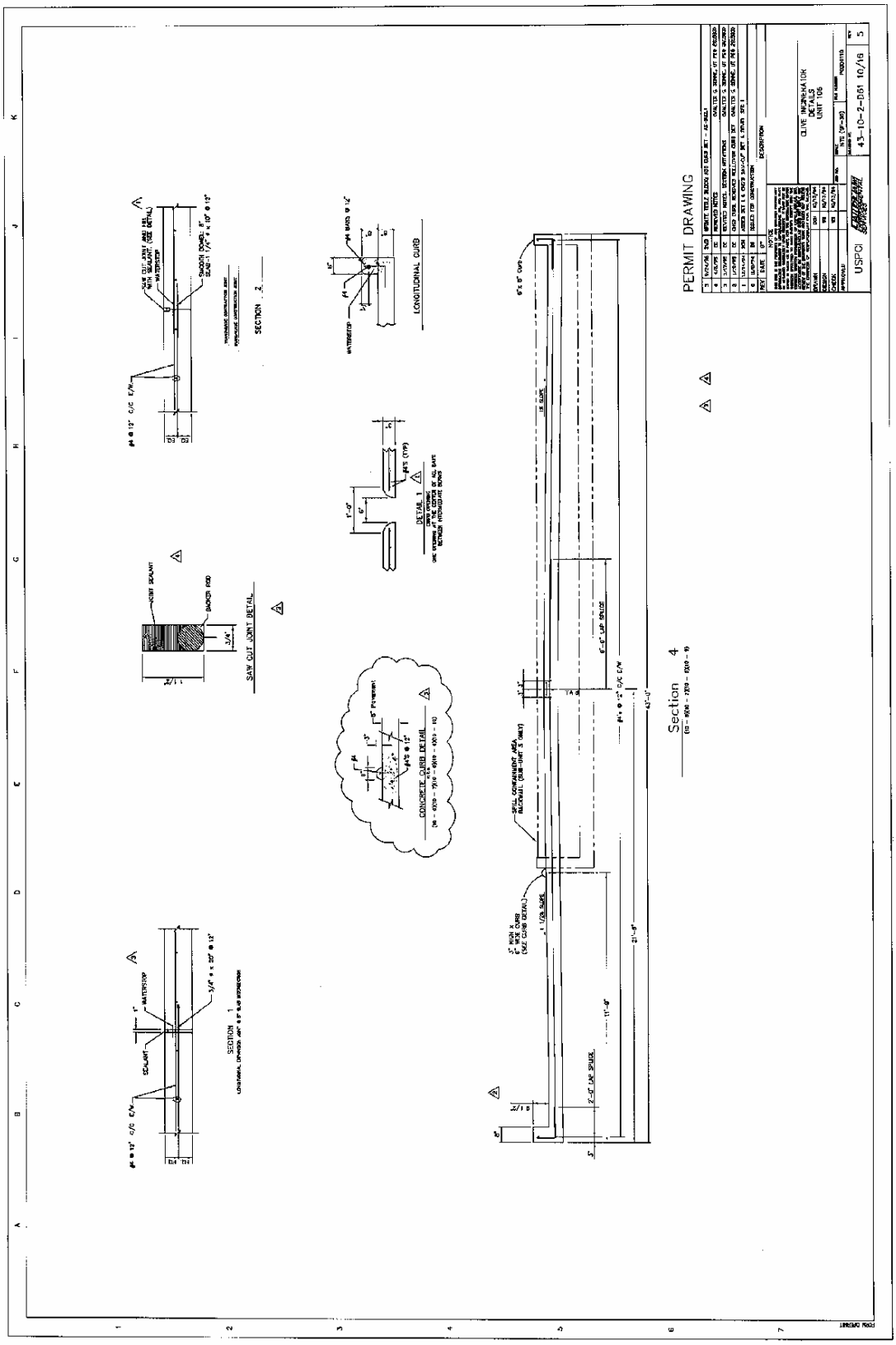
Area 106 -- Containerized Bulk Solids Storage Unit



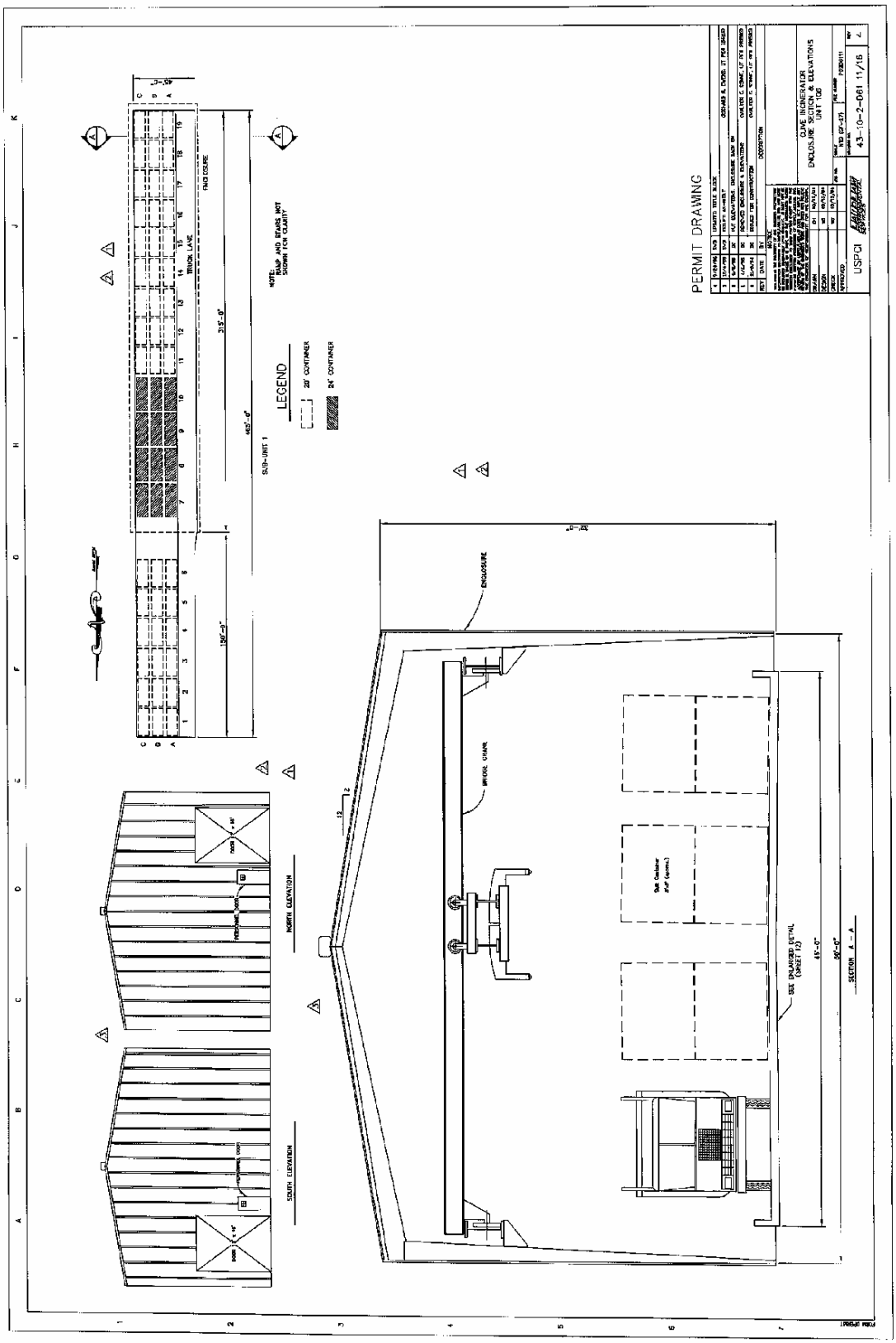
Area 106 -- Containerized Bulk Solids Storage Unit



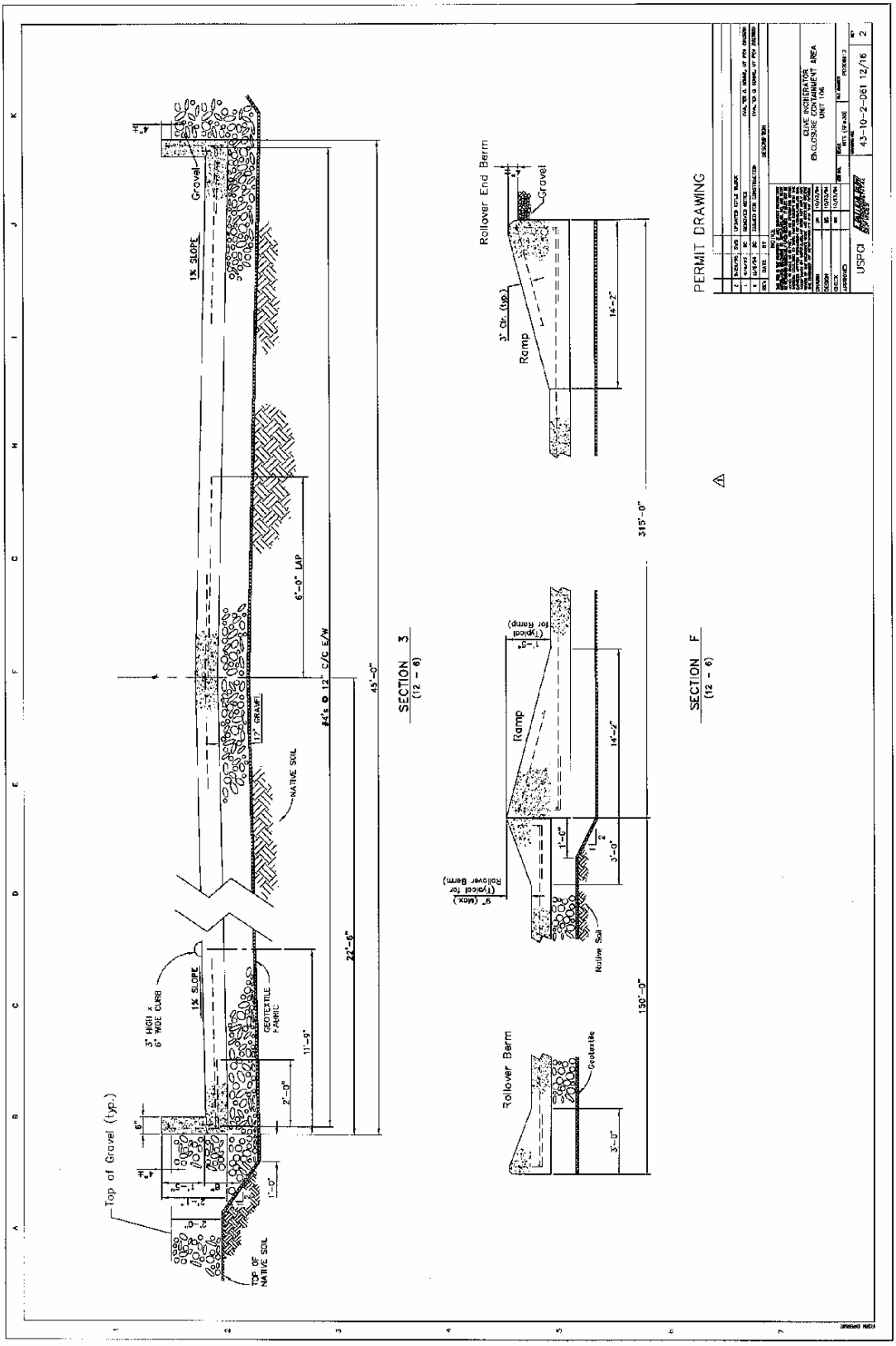
Area 106 -- Containerized Bulk Solids Storage Unit



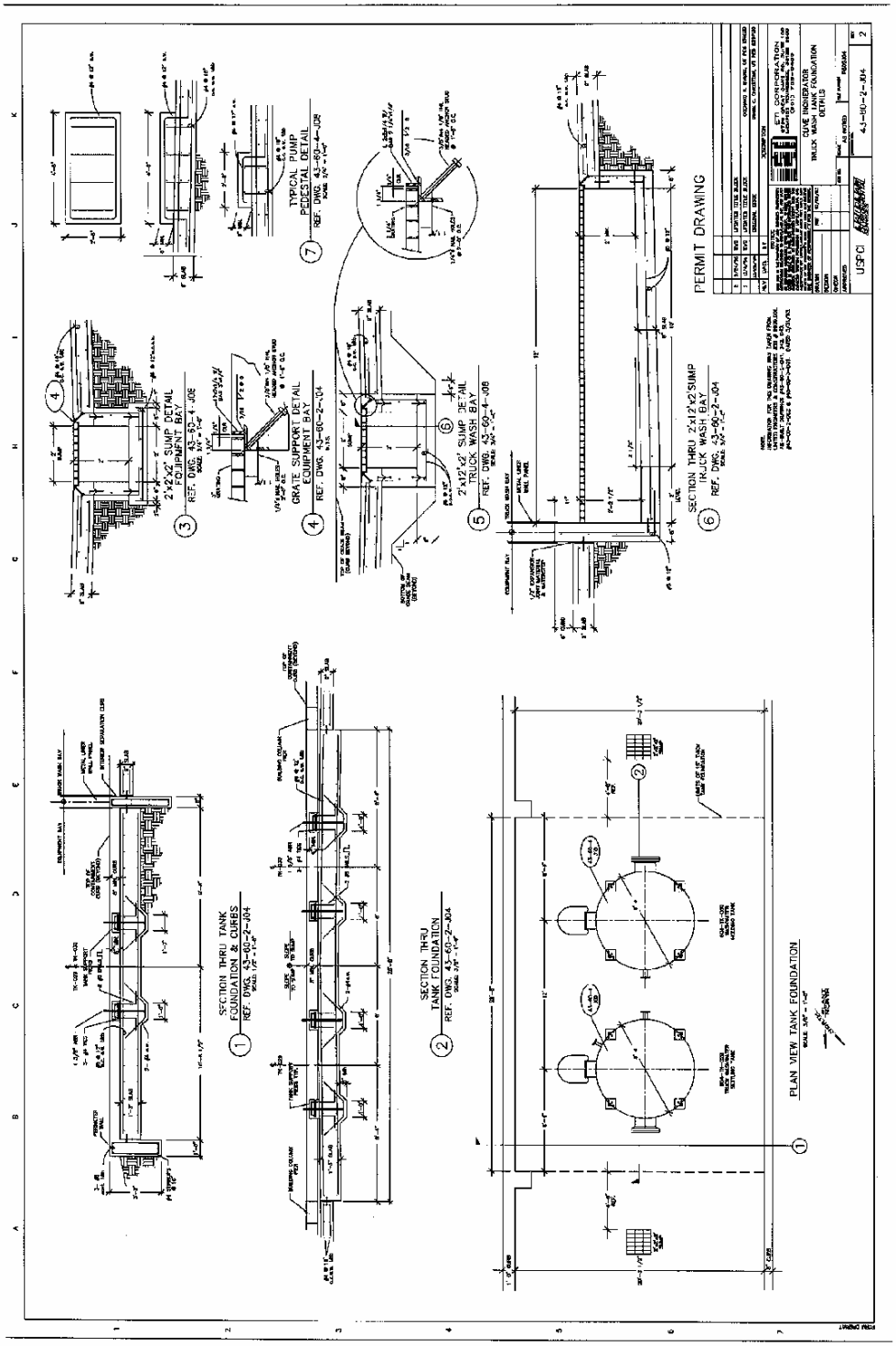
Area 106 -- Containerized Bulk Solids Storage Unit



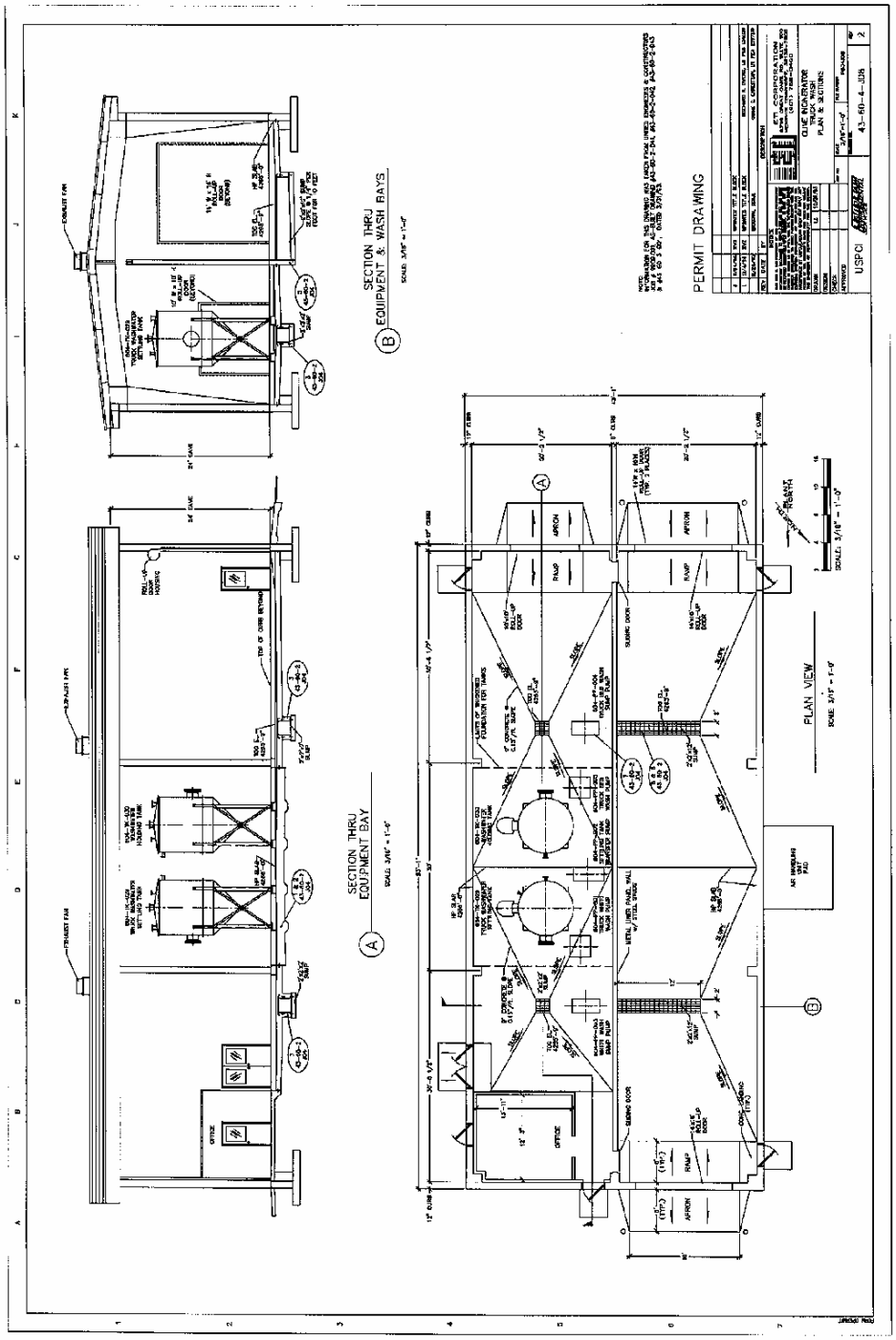
Area 106 -- Containerized Bulk Solids Storage Unit



Area 106 -- Containerized Bulk Solids Storage Unit



Area 604 -- Truck Wash



Area 604 -- Truck Wash

Attachment 4

Sampling and Analysis Plan

USED OIL ANALYSIS PLAN

1.0 INTRODUCTION

The purpose of this Used Oil Analysis Plan is to provide the protocols, including, where necessary, sampling and analysis, that will be used by Clean Harbors Clive, LLC ("Clive") to document the regulatory status of used oil and to ensure that the used oil is not a hazardous waste under the rebuttable presumption of Subsection R315-15-1.1(b)(1)(ii). This may be accomplished by determining whether the total halogen content of the used oil is above or below 1000 ppm.

All shipments of used oil handled by this facility will be subjected to these protocols. This is to help ensure that this facility will be in compliance with applicable permits and regulations. The used oil indicated below will not be subject to the sampling and testing protocols of this Plan:

- Used oil received at the Clive facility as on-specification must be accompanied by a certification from a Utah-registered used oil marketer, documenting that the used oil meets the used oil fuel specifications set forth in Section R315-15-1.2. The marketer certification must be in writing.
- Used oil is received from generators, transporters, or marketers that have conducted a halogen test, and the test shows that the halogen content of the used oil does not exceed 1000 ppm. Documentation substantiating the test results must be provided to the facility or must accompany the shipment.
- Used oil having a halogen content that exceeds 1000 ppm is received from generators, transporters, or marketers that have demonstrated that the source of the halogens is metalworking fluids in the oil that contain chlorinated paraffin's and is not a result of mixing the used oil with hazardous waste. Documentation of the halogen sources must be provided to the facility or accompany the shipment.

2.0 SAMPLING METHODOLOGY

Specific sampling procedures are dependent on both the nature of the material and the type of container used to ship the used oil. In addition to American Society for Testing Materials (ASTM) and other EPA approved sampling procedures, the Clive facility has instituted specific methodologies for ensuring that samples taken from various types of containers are representative. These methodologies are based on SW-846, Edition V. Used oil can be received at the Clive facility in drums, tote tanks, tank trucks, and/or railcars. The sampling devices are selected depending on the size and type of the container and on the specific material involved. The number of samples required for reliable sampling will vary depending on the distribution of the waste components in the container.

Sampling of small containers (i.e., 55-gallon drums) containing flowable materials will be conducted using a Coliwasa unit or equivalent device is used to obtain a full vertical section sample. For nonflowable oil, grab samples are taken from the top of the container. Sampling of large containers and tankers are sampled with a Coliwasa, tubing, and weighted bottle or bomb sampler. Railcars

may be sampled from a bottom-sampling valve when not readily sampled from above, so long as they are parked in a permitted area with secondary containment adequate to hold the entire contents of the rail car.

When sampling is required, the following procedures shall be followed:

- The Permittee shall collect a representative sample from tanks, totes, drums or other containers to determine the halogen content. Sampling personnel shall be trained on appropriate sampling methods for each type of container and matrix.
- Samples collected from bulk oil containers greater than 55 gallons shall be individual samples, not composited samples.
- A representative composite sample may consist of not more than four drums/containers or 220 gallons, whichever is less, per composite sample from drums or containers from the same source. The individual drum/container samples are consolidated into one representative composite sample and tested.
- Drums or containers of used oil from different sources or processes shall be sampled individually.

3.0 INBOUND USED OIL

3.1 Analytical Protocols

Prior to accepting inbound shipments of used oil for storage and subsequent transfer, documents used to ship the used oil to the Clive facility will be examined and a determination will be made on whether the shipment meets the criteria described in Section 1.0 or must be tested to determine halogen content. For used oil shipments that will be required to be tested, a representative sample of the oil is taken using the appropriate method described in Section 2.0 and placed in a sample jar. The sample jar will be labeled with information that describes the customer name, receipt date, and shipping document number.

Testing of the sample is performed using an un-expired Clor-D-Tect or Hydroclor test kit. The results are documented on the shipping paper (or on a separate document kept with the shipping paperwork) and the identity of the sample is noted on the sample jar along with the test results. If the Clor-D-Tect test results show halogen content greater than 1,000 ppm, the shipment will be presumed to be hazardous waste until the shipping entity (generator, transporter, or marketer) demonstrates that it is not a hazardous waste. Clive personnel will contact the entity that shipped the used oil to determine how the material should be managed from this point forward. Two alternatives exist for managing the material:

1) The used oil will be managed as a hazardous waste. The Clive facility will label the container with the appropriate hazardous waste labels and place the material in a permitted on-site hazardous waste storage area until it is shipped off-site for disposal. The facility will also work with the shipping entity to resolve any shipping document, i.e. manifest, issues arising from the shipment. If necessary, the facility will submit an unmanifested waste report to the UDEQ.

2) The shipping entity, working in conjunction with the facility, will attempt to rebut the hazardous waste presumption according to the requirements of R315-15-4.5.

When halogen field screening is performed, the following procedures shall be followed:

- The Permittee shall screen used oil or oily water subject to R315-15 of the Utah Administrative

Code in accordance with the following requirements:

- CLOR-D-TECT® halogen test kit (EPA Method 9077) for oil containing less than 20% water; or

- HYDROCLOR-Q® test kit if the oil contains between 20% and 70% water using the following conversion formula:

  True Halogen Concentration = Reading Syringe + [(10 + ml oil in sample)/10]

  Example: sample contains 6 ml water and 4 ml oil (60% water) and the syringe reading is 2,000 ppm, then the true concentration is:
  2,000 ppm [(10 ml + 4 ml)/10] = 2,800 ppm

- HYDROCLOR-Q test kit without correction for oil containing greater than 70% water.

- The requirement for a quality control sample (duplicate) may be satisfied by testing prior to off-loading from permitted vehicles in accordance with the CLOR-D-TECT® kits (Method 9077 of SW846) and is not required for each load collected.

3.2 Rebuttable Presumption Test

According to regulations published in R315-15-4.5, used oil containing greater than 1,000 ppm of total halogens is presumed to be a hazardous waste unless and until the shipping entity had demonstrated the used oil contains no significant amounts of halogenated constituents. There are two options for rebutting the presumption that the oil is a hazardous waste:

- Generator Knowledge: the shipping entity can supply the facility with sufficient information, including previously run analytical tests, product SDS or a specification sheet that demonstrates that the presence of the halogens in the used oil is not the result of mixing with a halogenated hazardous waste. An SDS shall not be used as the exclusive documentation for the purposes of establishing generator knowledge. Documentation showing that the halogens in the used oil come from chlorinated paraffin's, or has been contaminated with enough sea water to account for the halogen measurement would be considered valid information.

- Analysis: One or more of the following analyses could be run on the sample of used oil by a Utah-certified laboratory. A Utah-certified laboratory is a laboratory holding a current Utah Laboratory Certification issued by the Utah Department of Health for the appropriate testing procedure used.

  - Total Halogens – If the total halogen result is less than 100 ppm, the rebuttal is successful and the oil is not considered hazardous waste. If the total halogen result is 100 ppm or greater, the waste must either be managed as hazardous waste or additional analysis must be run (either for the F001/F002 compounds or the 40 CFR 261 Appendix VIII halogenated compounds, which include the F001/F002 compounds). Clean Harbors Clive shall use Methods 9075 and 9076.
  - Analyze for F001/F002 compounds -- If F001/F002 is run and any one or more compounds are detected at 100 ppm or greater, F001 and/or F002 must be assigned and the oil must be managed as hazardous waste. If F001/F002 is run and no compounds are detected at 100 ppm or greater, nor collectively exceed 1000 ppm, and the total concentrations of the F001/F002 compounds equals (plus or minus 15%) the total halogen result, the rebuttal is successful and the oil can be managed as non-

hazardous. If F001/F002 is run and no compounds are detected at 100 ppm or greater, but the total concentrations of the F001/F002 compounds does not equal (plus or minus 15%) the total halogen result, the rebuttal has not been completed and either the oil must be managed as hazardous waste or the 40 CFR 261 Appendix VIII hazardous halogenated compounds must be analyzed for. Hazardous halogenated compounds are analyzed by EPA Method SW846 – 8260D with Library Search.

- Analyze for 40 CFR 261 Appendix VIII hazardous halogenated compounds - If the Appendix VIII halogens are analyzed for and any one or more are detected at 100 ppm or greater, the applicable RCRA waste code(s) must be assigned and the oil must be managed as hazardous waste. If the Appendix VIII halogens are analyzed for and none are detected at 100 ppm or greater, and collectively do not exceed 1000 ppm, the rebuttal is successful and the oil can be managed as non-hazardous. Hazardous halogenated compounds are analyzed by EPA Method SW846 – 8260D with Library Search.

4.0 RECORDKEEPING

The Clive facility will maintain records of used oil receipts and shipments either in “hardcopy” paper records at the facility or through electronic records, including scanned documents, readily accessible at the facility. Laboratory and other test results will be maintained for a minimum of three years. Retained samples of used oil receipts, if required, will be maintained at the facility up to the time that they are burned for energy recovery or disposed as hazardous waste by the ultimate receiving facility.

Clive will automatically extend the period of retention of these or any other records if requested by the EPA, or UDEQ, or in the event of an unresolved enforcement action regarding regulated activity.

Attachment 5

Emergency Spill Plan

USED OIL CONTINGENCY/SPILL CONTROL PLAN

1.0 Facility Information

Facility Name: Clean Harbors Clive
Facility Operator: Clean Harbors Clive, LLC
Location: 3.5 mi south of Milepost 49 (Clive Interchange) on Interstate 80, Clive, UT.

The facility is designed as a transfer and storage facility of On-Specification and Off-Specification used oil as defined in R315-15 Standards for the Management of Used Oil. Used oil is stored in container storage buildings and in other permitted storage areas. Used oil is shipped to other locations for energy recovery or disposal.

This plan mirrors the facility's State-issued RCRA Part B Permit Contingency Plan as well as the Contingency Plan for the Clean Harbors Aragonite facility. This plan utilizes procedures, resources and emergency coordinators from the Aragonite facility.

2.0 Purpose

This Contingency/Spill Control Plan ("Contingency Plan") outlines the emergency procedures that will be employed to minimize risks to human health and the environment.

3.0 Emergency Coordinators

The names of those persons qualified to act as Emergency Coordinator at Aragonite are provided in Table 1. The Emergency Coordinator for Aragonite also acts as the Emergency Coordinator for Clive. All Emergency Coordinators have the authority to call on outside assistance or call upon Clean Harbors Aragonite and Clean Harbors Clive resources to respond to the emergency and to commit requisite resources to implement this plan.

The Aragonite Shift Supervisor, also identified as the Incinerator Supervisor, is normally the Emergency Coordinator. When no Shift Supervisor is available at Aragonite, another qualified individual (identified with an asterisk (*) on the Emergency Call Sheet (Table 1)) will be designated as the Emergency Coordinator. At least one of the individuals qualified to act as Emergency Coordinator will be on-site at Aragonite at all times. The Aragonite Control Board Operator (CBO) will know the identity of the Emergency Coordinator.

The duties of the Emergency Coordinator are to assess the situation and take steps necessary to protect human health and the environment. The Emergency Coordinator is responsible for the coordination of containment and recovery operations following an emergency or a major emergency. The responding Emergency Coordinator is responsible for the complete written report of the incident. The Environmental Manager will be responsible for forwarding the report to the appropriate regulatory agencies.

TABLE 1

EMERGENCY CALL SHEET

Clive Emergency Coordinators

Position	**Name**	**Telephone Numbers**
Primary	Branden Prettyman	435-884-8573 (Office) 435-840-5469 (Cell)
Alternate	Chris Krish	435-884-8424 (Office) 435-841-1842 (Cell)
Alternate	Chris Bjerke	435-884-8570 (Office) 801-831-5368 (Cell)

4.0 Definitions

Major Emergency:

Any explosion, fire, spill, discharge, or natural disaster which has damaged or destroyed, or threatens to damage or destroy, plant property, or impair plant operations, or results in a discharge of waste material into the environment and is beyond the capability of on-site personnel and equipment to control. A major emergency may originate from an on-plant event, such as spills, fires, explosions, etc., or an off-plant incident, such as an aircraft crash on plant property, fire from neighboring property, or natural disasters.

Emergency:

Similar to a major emergency except that no outside assistance is needed or summoned to deal with the situation. This includes spills or discharges outside of containment areas reportable under section 11.0 of this plan, explosions, and fires.

Spill or Discharge:

A spill is defined as any release of used oil which includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment. This definition applies to all materials that are released. Specifically excluded from the definition of "spill" is any release which does not enter the environment or any federally permitted release (e.g., permitted air emissions).

Contained Spill or Discharge:

A spill or discharge which is contained means that the spill is contained within an area which provides a barrier to prevent a release from contacting the ground or surface waters. This includes paved areas where no runoff occurs, secondary containment structures and the inside of buildings.

Shutdown of Operations:

Curtailing of site operations, by shutting down all used oil activities. Buildings are closed to prevent wind or rain from entering, and all unloading operations are ceased, as needed. Maintenance and contractor's machinery will be shut down, as needed.

Designated Gathering Points (DGP):

The Northern DGP is just west of the main entrance road approximately 200 feet north of the Rail to Trailer Transfer Facility (Unit 255). The Eastern DGP is approximately 1000 feet east of the East Gate in the security fence, which is near the Containerized Waste Storage & Staging Facility (Unit 101). The Southern DGP is approximately 1000 feet south of the South Gate in the security fence, which is near the southwest corner of the maintenance building (Unit 061). The Western DGP is approximately 1000 feet

west of the West Gate in the security fence, which is near the southeast corner of the Bulk Container Storage Area (Unit 106).

5.0 Spill Prevention

The facility provides secondary containment for all used oil container storage areas as well as for tanker truck and railcar unloading facilities. Detailed information on these areas is provided in Attachment 2 of this permit. For container storage areas the secondary containment volume provided will be at least 10% of the total permitted storage volume, or the volume of the largest container, plus sufficient freeboard to allow for precipitation and fire sprinkler water. In addition, the secondary containment systems have no drain valves or other openings outside of containment.

Inspections of used oil container storage areas will be conducted on a routine basis, in accordance with Clive's State-issued Part B Permit inspection matrix, to ensure that there are no spills or leaks which could escape containment and reach the environment. These inspections will be conducted and documented as part of the inspection program required by the facility's State-issued Part B Permit and Condition I.D.2 of this permit.

Rail cars dropped off at the Rail Spur are initially inspected upon notification of being dropped off. The cars shall be inspected for signs of leaking and corrosion and checked to ensure they are closed in accordance with the tank car closure standards. The area surrounding the tank cars located at the spur is checked for any signs of release. When rail tank cars are dropped off at the rail spur to await pick up by the facility rail engine to be brought into storage at the facility, the cars will be inspected daily to ensure that there are no spills or leaks which could escape containment and reach the environment. These inspection records are kept as part of the facility operating records.

Inspection and corrective action records will be maintained electronically or on paper logs and will be retained on-site as part of the facility operating record for a period of three (3) years. The records will be made readily available for review by a duly authorized regulatory inspector.

Truck transfer operations shall occur within permitted contained areas. The vehicle shall be observed during the transfer operations and the units inspected as part of the General Facility Inspection Plan required by the facility State-issued RCRA Part B Permit while in storage. The inspections shall include leak checks, integrity of the secondary containment system, and operational condition of pumps, piping, and connections.

At the completion of the transfer operation, the operator shall disconnect the transfer hose and empty the residual liquid into a drip pan or container, from which the liquid is managed appropriately. Spills and leaks will be cleaned up within 24 hours or according to relevant procedures described in Section 6.0 of this Plan

All personnel involved with handling used oil will receive operational, safety, and spill prevention training (as described herein). The training includes, but is not limited to the following:

1. Operational and maintenance equipment to prevent the discharge of used oil.
2. Discussion of applicable pollution control laws, rules, and regulations.
3. Safety and evacuation measures required in the event of a release, fire, or explosion at the facility.
4. Emergency notification and spill control procedures in the event of discharge of used oil to the environment.

The facility will schedule and conduct spill prevention briefings for operating and maintenance personnel at least every 12 months. These briefings will highlight and describe known spill events, equipment malfunctions, and recently developed precautionary measures. The briefings may be included as part of other training programs, and will include all individuals whose activities are affected by the requirements of this Contingency/Spill Control Plan.

6.0 Implementation of the Contingency/Spill Control Plan

The Contingency/Spill Control Plan (Contingency Plan) will be implemented at Clive whenever there is a major emergency, emergency, whenever there is a contained spill or discharge which threatens human health (i.e., a spill or discharge resulting in one or more individuals requiring medical treatment or evaluation), or any other time the Emergency Coordinator feels it is appropriate. The purpose of this Contingency Plan is to outline the actions which operating personnel will take in response to emergencies, such as fires, explosions, leaks, spills, natural disasters, or discharges of hazardous substances. It establishes guidelines for the orderly handling and reporting of emergency situations which occur or could foreseeably develop at the Clive facility.

Minor spills of used oil (those that are less than 25 gallons in volume), spills that occur in secondary containment, or de minimus spills may not require full implementation of the Contingency Plan. This determination will be made by the Emergency Coordinator as part of his assessment of the situation. All spills of used oil, including minor spills, and any residue, or contaminated soil, water or other material

resulting from the spill will be cleaned up to the point that the spilled material, residue, or contaminated soil, water, or other material does not present a hazard to human health or the environment. As discussed in 12.0 below, Clean Harbors Clive shall immediately notify the Utah State Department of Environmental Quality 24-hour Answering service at (801) 536-4123 for used oil releases exceeding 25 gallons or smaller releases that pose a potential threat to human health or the environment.

6.1 Assessment/Notification

Any person discovering a situation which may require implementation of the Contingency Plan (e.g., fires, spills, etc.) shall immediately warn others working nearby and notify the Emergency Coordinator.

The Emergency Coordinator will appraise the situation and determine whether to initiate the full Contingency Plan or whether only specific aspects of the Plan (i.e. spill response/cleanup measures) are required to address the situation. The Emergency Coordinator will notify personnel on site of the situation through radios or cell phones. The Emergency Coordinator is also responsible for making the initial notifications specified in Section 12.0 of this Plan.

Should the situation result in the spill or discharge of used oil, the spill prevention control and countermeasures procedure shall be followed.

If there is a spill or discharge, the worker(s) discovering it will immediately notify the Emergency Coordinator and assess the characteristics of the spill or discharge and promptly initiate a plan to stop the source of the leak. The Emergency Coordinator will initiate measures so as to protect human health and the environment.

Information about used oil stored on-site is tracked in the tracking database or though hardcopy paper records. All used oil stored on-site is tracked by facility personnel.

6.2 Evacuation Plan

In the event that an evacuation is necessary, on-site personnel will be notified by radio or cell phone. The evacuation routes should be upwind or crosswind of the emergency and culminate at the designated assembly point(s). Clive personnel trained in security and designated as the security official will be available by radio or telephone and, will announce the appropriate assembly point(s) over the radio or cell phone. All non-essential personnel, visitors, and contract personnel shall evacuate the area and assemble at the appropriate assembly point(s).

The facility has a system for identifying everyone within the facility. The designated person at the assembly point(s) will notify the Emergency Coordinator of any personnel that are known to be missing. Visitors shall be the responsibility of their Clive contact for accountability.

6.3 Control Procedures

6.3.1 Spills or Discharges

Spills of used oil will normally be contained in the area where the spill occurs. All spills will be collected in an appropriate container (55-gallon drum, tote tank, or tanker truck) and will be subsequently transferred to an approved storage area.

Spills may also occur outside of the containment berms, for example in the case where the containment area has been damaged or in the situation where the spill occurs when the waste is not in a containment area. All material will be kept from entering storm drains, water courses, wells, water systems, and navigable waterways, using appropriate spill control measures.

The following steps are taken to contain and clean up spills and discharges:

- Dress in appropriate protective equipment.
- Prevent further leaking by repositioning the container, overpacking, or applying a temporary seal to the leak. Simple overpacking for containers is the preferred method.
- Prevent the spill from spreading by trenching or encircling the area with a dike of sand, absorbent material, or, as a last resort, dirt or rags, or other suitable material. If the spill is in an outside area and it is raining or rain is imminent, cover the spill with plastic sheeting, if feasible.
- The spill area is cleaned up and tested for contamination, as appropriate. If the spill area is not in a containment area (i.e., on dirt) the contaminated material will be removed.

6.3.2 Explosions

In the event of an explosion, the Emergency Coordinator will immediately shut down all equipment that may be affected. If the explosion occurs where liquids are stored and a spill occurs, procedures for spill containment will commence. Explosions involving other plant areas will require evacuation, possible first aid for injured personnel, securing the area to prevent unauthorized entry, and assessment of damages.

In all cases, the Emergency Coordinator must be notified as soon as equipment and waste storage areas are secured.

6.3.3 Fires

In the event of a fire, the automatic sprinkling system and water cannons may be activated. Fire extinguishers are located in all buildings. In the event a fire cannot be extinguished using the stationary equipment, fire hoses may be hooked to the hydrants and activated. The water falling on the used oil storage areas will primarily be contained through the containment sump systems.

7.0 Prevention of Recurrence or Spread of Fires, Explosions, or Releases

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

If the facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

8.0 Storage and Treatment of Spilled or Discharged Material

Post event sampling and analyses will be performed as needed after containment, clean-up, and decontamination procedures have been completed. Containers of collected spilled oil, containment booms, and/or contaminated soil will be stored in unaffected container storage areas until they are sent off-site for disposal or recycling.

9.0 Emergency Equipment

Emergency equipment at the site along with a physical description and outline of its capabilities is described under the section titled Emergency Equipment below.

10.0 Post-Emergency Equipment Maintenance

All equipment used during an emergency, major emergency, or contained spill or discharge will be cleaned and/or replaced, when necessary, to prepare for any future use. The emergency equipment will be checked as necessary for completeness and operability.

11.0 Coordination Agreements

The Clive facility has negotiated a written agreement with Tooele County. Representatives of Tooele County have been contacted, have received a copy of the facility's State-issued Part B Permit Contingency Plan, and have received a plant walk-through to familiarize them with the plant layout and function. Annual re-orientation is offered at the plant site for Tooele County representatives. By the terms of the written agreement, Tooele County has agreed to provide the following services:

- Tooele County road maintenance,
- Routine law enforcement,
- Fire response,
- Public health,
- Public safety,
- Hospital isolation unit, and
- Telecommunications.

Clive has also negotiated agreements with other local agencies to provide assistance in the event that additional equipment and manpower are required at the facility. Representatives of each agency below have been contacted. Each has received a copy of the facility's State-issued RCRA Part B Permit Contingency Plan and has received a plant walk-through to familiarize each agency with the plant layout and function. Also, annual re-orientation is offered at the plant site to the following agencies:

Tooele County Sheriff's Department* Tooele, Utah
435-882-5600

Tooele Emergency Management
435-843-3263

* The Sheriff's Department is the designated primary coordinating agency.

The following organizations may be notified of an emergency condition if appropriate.

Emergency Services	Business Number	Emergency Number
West Wendover Fire Department	(775) 664-2274	Dispatch (775) 664-4393 or **911**
West Wendover Police Department	(775) 664-2930	
West Wendover Ambulance	(775) 664-2081	
Air Medical Evacuation University of Utah Hospital Helicopter	(801) 581-7200	Dispatch (801) 581-2500 or **911**
Life Flight LDS Hospital	(801) 321-3330	Dispatch (801) 321-1234 or **911**
North Tooele County Fire District	(435) 882-6730	Dispatch (435) 882-5600 or **911**
Grantsville Fire Department	(435) 884-3343	
Grantsville Police Department	(435) 884-6881	
Grantsville Ambulance	(435) 882-5600	
Tooele County Sheriff[1]	(435) 882-5600	
Tooele Police Department	(435) 882-8900	
Tooele Ambulance	(435) 882-5600	
National Poison Control	1-800-222-1222	
National Response Center	1-800-424-8802	
Utah Division of Waste Management and Radiation Control	(801) 536-0200	(801) 536-4123
Clean Harbors Corporate Office	(781) 792-5000	
U.S. EPA Region VIII	(303) 312-6312	
Utah Highway Patrol	(801) 965-4518	
3E	(800) 360-3220	
Bureau of Land Management	(801)-977-4300	

Mountain West Medical Center

435-843-3600

University of Utah Hospital

801-581-2291

Spill contractors may be contacted, as necessary:

Other emergency assistance and advice can be solicited from:

Clean Harbors Transportation Related Emergencies
800-483-3718

National Response Center U.S. Coast Guard 400 Seventh Street, S.W. Washington, D.C. 20510
800-424-8802

ChemTrec (Chemical Transportation Emergency Center)
800-424-9300

This plan will be reviewed annually, updated as necessary, and forwarded to Tooele County's Department of Emergency Management and Department of Engineering.

12.0 Required Notifications and Reports

As required by R-315-15-9, Clean Harbors Clive shall immediately notify the Utah State Department of Environmental Quality 24-hour Answering service at (801) 536-4123 for used oil releases exceeding 25 gallons or smaller releases that pose a potential threat to human health or the environment. The notification will include:

Name and telephone number of reporter;
Name and address of facility;
Time and date of the release;
Location of the release;
Description and quantity of material(s) involved, to the extent available;
The cause of the release, if known at the time;
The extent of injuries, if any; and
The possible hazards to human health or the environment, and the action taken to minimize the hazard.

Clean Harbors Clive will record in the operating record any incident that requires implementing this Contingency Plan. In addition, Clean Harbors Clive will submit a written report to the Director of the Division of Waste Management and Radiation Control (Director) within 15 days after an incident that required implementation of the Contingency Plan. The report will include:

Name, address, and telephone number of the facility;
Date, time, and type of incident;
Name and quantity of material(s) involved;

The extent of injuries, if any;
An assessment of actual or potential hazard to health or the environment, and
The estimated quantity and disposition of recovered material that resulted from the incident.

Spills on site involving reportable quantities (RQ) will be reported to the National Response Center, the Utah Division of Waste Management and Radiation Control, and the Tooele County Office of Engineering and Department of Emergency Management.

If plant operations were suspended due to Contingency Plan implementation, operations will resume after plant management has determined that all safety-related questions have been satisfactorily addressed. State officials will be notified that the facility is in compliance with the permit and R315-15 prior to resuming operations.

Reports to the Director of DWMRC shall be sent to:

Director
Utah Division of Waste Management and Radiation Control
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Or hand delivered to

Director
Utah Division of Waste Management and Radiation Control
195 North 1950 West
Salt Lake City, Utah 84116

Reports to EPA Region VIII shall be submitted to:

Regional Administrator
U.S. EPA Region VIII
1595 Wynkoop Street
Denver, Colorado 80202

Reports to Tooele County shall be submitted to:

Tooele County

Department of Emergency Management and Department of Engineering
47 South Main
Tooele, Utah 84074

EMERGENCY EQUIPMENT

The following is a list of the emergency equipment, spill control equipment, communication systems, alarm system, and decontamination equipment which may be utilized at the facility.

- Internal facility communications systems. Communications inside the Clive facility are achieved through a telephone system, cell phones, and CB radios. There will be telephones located so that each employee will have access to one from his/her workstation. From each telephone an employee can call any other telephone in the Clive facility and can be connected to an outside phone line. The telephone system is equipped with an uninterruptible power supply for reliability during a loss of primary power. Two-way radios are available at each waste management unit, and to various operations and/or management personnel based on operational requirements to supplement the telephone system. Cell phones may also be used.

- External facility communications systems. The Clive facility is connected to the local telephone system and cell phone networks.

- Overpack drums. An overpack drum is a container large enough to hold a standard 55gallon drum. They are available at the facility and are used to hold smaller containers which are damaged or leaking.

- Absorbent agents. Absorbent agents are dry powders, granular materials, mats or pads, etc., which can reduce or stop the spread of spilled liquids and allow the spilled material to be recovered as a solid. These agents will, at a minimum, be available at Rail/Truck Transfer Bay (Unit 535) and the Containerized Bulk Storage Unit (Unit 106). The Clive facility may, at its discretion, place absorbents at various other locations as well. The locations of spill kits are shown on the emergency equipment diagrams in Clean Harbors Clive's State-issued RCRA Part B Permit.

- Fire water system. The fire water system consists of a water tank, pumps, water pipes, hose stations, monitors, hydrants, and building sprinkler systems. The water tank has a capacity of 685,230 gallons of water with 371,166 gallons held as a minimum for firefighting (more than a 120 minute supply at 2500 gallons per minute). The fire water pumps are rated to provide the required volume at a pressure high enough to operate foam equipment.

- Fire extinguishers. Fire extinguishers of various sizes from 2½ to 50 pounds, rated for Class A, B, and C fires, are located at locations shown on the emergency equipment diagrams in Clean Harbors Clive's State-issued Part B Permit. Fire extinguishers for Class D (combustible metals such as magnesium or sodium) fires are also available. These fire extinguishers are operated by pulling a pin and squeezing the handle lever while directing a short hose or the extinguisher nozzle at the burning surface.

- Vacuum truck. There will be at least one vacuum truck at the Clive facility for picking up liquids from the various sumps throughout the facility. If solids need to be picked up, conventional equipment such as brooms, shovels, vacuums, front-end loaders, etc. will be used. The vacuum truck will be stored at the Clive facility, but will be available to the Grassy Mountain Facility, and for spill response, on an as needed basis.

- Safety shower and eye wash stations. There are several locations where a supply of water will be available through shower heads and bubblers for employees to flood themselves with water if they are sprayed with a hazardous substance. These stations operate by simple pull handles and foot pedals. At least one safety shower and eye wash station will be located in or near each waste management area. Portable units may be used in these locations in lieu of hard piped units.

- Self-contained breathing apparatus (SCBA). A number of devices consisting of a portable cylinder of compressed breathing air, pressure regulator, hose, full-face mask, and carrying harness are available. Response personnel can use the SCBAs to enter an area where smoke or gases make the ambient atmosphere dangerous to breathe. Each SCBA can supply approximately one-half hour of air.

- Negative Pressure Respirator (NPR). There are two types of NPRs, full face and half face. They are both equipped with fittings to which air contaminant-specific cartridges are attached. Air to be inhaled by the wearer is filtered through the cartridge and the specific contaminants are removed. Each employee will be issued a mask and cartridges appropriate for his work area. The mask will be fit-tested on the employee when the mask is issued, whenever the model or size of the mask changes, and at least annually. Cartridges for other contaminants and both styles of masks will be available to employees as necessary.

- Cartridge air mask. There are two types of cartridge masks, full face and half face. They are both equipped with fittings to which air contaminant-specific cartridges are attached. Air to be inhaled by the wearer is filtered through the cartridge and the specific contaminants are removed. Each employee will be issued a mask and cartridges appropriate for his work area. When the mask is issued, if the model or size of the mask changes, and at least annually, the mask will be fit-tested on the employee. Cartridges for other contaminants and both styles of masks will be stocked at the safety equipment storage area.

- First aid stations and first aid kits. There are two first aid stations on site. One, in Building 061, the maintenance building, and the other in Building 052, the Main Office. Each will contain sufficient medical supplies to treat injury conditions ranging from minor injuries to major injuries for which an emergency medical technician (EMT) is qualified to treat. Medicine is also be available to help employees alleviate symptoms of minor illnesses i.e., headaches, hayfever, colds, etc. Located in at least each waste management area are first aid kits which include a supply of materials necessary for a person to treat severe bleeding and give CPR, i.e., heavy bandages, latex gloves, mouth to mouth resuscitation mask.

- Protective clothing. Employees working at the Clive facility will be issued hard hats, safety footwear and safety glasses. Other protective clothing, such as protective coveralls, waterproof safety boots and specialized gloves are provided based on the requirements of the area or job function being performed. The hard hats are made of high impact plastic. The protective coveralls are made from polyethylene fibers (such as Tyvek or equivalent) and are disposable. The waterproof safety boots are solvent resistant synthetic rubber. The gloves are latex rubber, synthetic rubber, or knit (cotton, polyester, etc.) depending upon the specific job requirements. A supply of the job or area specific protective clothing will be available for each waste management unit and kept at the safety equipment storage area.

- Portable pumps. A number of portable pumps for removing liquids from sumps shall be kept at the Clean Harbors Clive and Aragonite facilities. The type of pump may include centrifugal, diaphragm, piston (trash pump), submersible, etc. Gasoline, air, or electricity may be used to power these pumps.

- Hand tools. Brooms, buckets, absorbent materials, and detergent will be kept at the facility. These may be used in spill control and decontamination activities. Decontamination kit. Shovels, brooms, detergent, and absorbent towels will be kept in or near each waste management area. These may be used in spill control and decontamination activities.

- Spill kit. Shovels, brooms, and absorbent materials will be kept in or near each waste management area. These may be used in spill control and decontamination activities.

Attachment 6

Waste Disposal

MANAGEMENT OF WASTE LIQUIDS, SOLIDS AND SLUDGES

1.0 Disposal of Waste Liquids, Sludges and Solids

Clean Harbors Clive, LLC, ("Clive") facility will be used as an on-specification and off-specification used oil transfer facility for the purposes of facilitating the movement of used oil to final destination facilities where it will be burned for energy recovery or disposed. The majority of the used oil will be simply shipped off-site in the same container in which it was received. In this case, no waste liquids, sludges, or solids will be produced.

In those cases where used oil is transferred from one type of container to another, for example from railcar to tanker truck, there may be some sludge or solid residue in the railcar that cannot be easily transferred to the new container. In this case, facility personnel may physically remove the residue and place it into drums or other sealable containers. These containers may also contain any rinse water that may have been used in the process of removing the solid/sludge residue from the railcar. Containers of residue and rinse waters will be characterized and sent to the Clean Harbors Aragonite, LLC facility where it will be disposed as waste, or if it meets facility requirements, used as supplemental fuel. No POTW's or similar facilities will be used to manage these residues or rinse waters.

The information on the Clean Harbors Aragonite, LLC facility is as follows:

Clean Harbors Aragonite, LLC
11600 North Aptus Road
Aragonite, Utah 84029
(801) 323-8100

Attachment 7

Closure Plan

The Clean Harbors Clive used oil transfer facility shall be closed in a manner that minimizes the need for further maintenance and eliminates, minimizes, or controls the possible hazards to human health and the environment in accordance with Clean Harbors Clive's, LLC State-issued RCRA Part B Permit Attachment 7 and this permit, with the following amendments:

1) In addition to the Closure Plan found in the Permittee's State-issued RCRA Part B Permit, the facility shall be closed in accordance with R315-15-11 of the Utah Administrative Code and conditions in I.K, I.L, and II.G of this permit.

2) The itemized task clean up and closure costs for financial assurance, required by I.K of this Permit, are estimated in Table 1 below. The financial assurance for closure is provided under Permittee's State-issued Part B Permit.

3) In addition to the sampling requirements found in Clean Harbors Clive's, LLC State-issued RCRA Part B Permit, at time of closure the Permittee shall sample any portions of the Clive Rail Spur where used oil spill had occurred. The location of any used oil spills shall be determined by checking the Permittee's spill records and by walking the length of the Clive Rail Spur to visually inspect it for spills.

Table 1

Itemized Task Clean Up and Closure Costs for Financial Assurance

Description	Item Amount	Rate	Cost
Plant Decommission: Removal of Used Oil Inventory and Other Wastes			
Used Oil removal / Incineration	233,860 gal x 13.5 lb/gal	$0.12 / lb	$378,853.20
Used Oil Removal Transportation Cost	12 Loads	$300.00 / Tanker Load	$3,600.00
Facility Soil and Water Investigation			
Sampling (Soil and Water)	37 Soil Samples / 13 Water Samples	$150.00 / Sample	$7,500
Sampling Rig Mobilization	1 mobilization	$1,200.00 / Mobilization	$1,200.00
Laboratory Analytical Cost	37 Soil Samples / 13 Water Samples	$1,200.00 / Sample	$60,000
Final Closure Verification Costs			
Independent P.E. Verification of Closure	1 Certification	$1000.00 / certification	$1,000.00
Division of Waste Management and Radiation Control Review	20 Hours	$100.00 / hour	$2,000.00
Total Closure Cost Estimate: $454,153.20			