



Division of Waste Management and Radiation Control
USED OIL TRANSFER FACILITY PERMIT



Permittee: Safety-Kleen Systems Inc.

Permittee Mailing Address: 1066 South Pioneer Road
Salt Lake City, Utah 84104

Permittee Phone Number: (801) 975-0742

Permittee Administrative Contact: Nick Culian, Safety-Kleen Environmental
and Safety Manager
Cell: (530) 363-2632
Email: Nick.Culian@safety-kleen.com

Permittee Transfer Facility Address: 1066 South Pioneer Road
Salt Lake City, Utah 84104

Facility Contact (Utah): Doug Winter, Utah Facility Manager
Office: (801) 975-0742
Cell: (801) 381-7674
Email: Douglas.Winter@safety-kleen.com

Type of Permit: Used Oil Transfer Facility Permit

Permit #: UOP-0047

EPA ID #: UTD980957088

Original Date of Issuance: August 1, 1997

Signature: _____
Scott T. Anderson, Director
Division of Waste Management and Radiation Control

Date: _____

I.A. Effect of Permit

- I.A.1. Safety-Kleen Systems Inc. (hereafter referred to as “the Permittee”) is hereby authorized to operate a Used Oil Transfer Facility located at 1066 South Pioneer Road, Salt Lake City, Utah, 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. The Director shall review this Permit 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.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. The Permittee shall inspect and maintain used oil equipment, tanks, containers, and storage units on a weekly basis to ensure compliance with this section. Electronic documentation is acceptable.

- I.D.3. 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 (Attachment 1).
- I.D.4. 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.5. 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 office located at 1066 South Pioneer Road, Salt Lake City, Utah.
- 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, date of acceptance, and signature of the transporter. Intermediate rail transporters are not required to sign the record of acceptance. Acceptance records may include a separate loading sheet that is signed or initialed and includes the original shipping document number, date of delivery and gallons transferred.
- I.F.3. The Permittee's facility shipping records shall document the transfer of 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 facility (dated upon receipt) shall sign the shipping record if located in Utah. Intermediate rail transporters are not required to sign the record of delivery.

I.G. Sampling and Analyses

- I.G.1. The Permittee shall follow all sampling and analytical procedures in Condition II.D and Attachment 2 (Sampling and Analysis Plan) 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 and storage units have been 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 materials to determine if the wastes are hazardous or non-hazardous in accordance with R315-15-8 of the Utah Administrative Code and manage 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.
- 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.
- 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. 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 use 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 using Form UO 004 (Annual Report for Used Oil Transfer Facilities) describing the Permittee's used oil activities in Utah. The Annual Report shall also include all financial assurance documentation required by Form UO 004.

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.

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II.A. Used Oil Transfer Facility Operations

- II.A.1. The Permittee is authorized to store 3,960 gallons of used oil (includes used oil filters) in non-bulk containers for up to 35 days.
- II.A.2. **Storage in tanks or highway tankers longer than 24 hours is prohibited.**
- II.A.3. The Permittee shall only accept shipments of used oil from Utah permitted used oil transporters.
- II.A.4. The Permittee shall verify, at the time of acceptance, that the transporter delivering the used oil has recorded the halogen content of the used oil on the shipping documents.
- II.A.5. The Permittee is not required to conduct further testing on used oil received 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.6. If the transporter has not documented the halogen content on the shipping records, then the Permittee shall determine the halogen content of the shipment of used oil received at the facility, prior to acceptance.
- II.A.7. The Permittee is allowed to accept shipments of used oil, as defined in R315-15-1.7(d) of the Utah Administrative Code, with halogen contents less than 1000 ppm. Used oil with halogen concentrations between 1,000 ppm and 4,000 ppm may only be accepted from transporters if any one of the following conditions is met:
- II.A.7.a. The Permittee rebuts the hazardous waste presumption in accordance with R315-15-1.1(b)(ii) of the Utah Administrative Code and Attachment 2 or there is analytical data accompanying the shipment documenting that the rebuttable assumption requirements of R315-15-1.1(b)(ii) of the Utah Administrative Code have been satisfied.
- II.A.7.b. The Permittee can verify that the used oil is solely from a Very Small Quantity Generators (VSQG).
- II.A.7.c. The used oil shipment is comprised solely of a Do-It-Yourselfer used oil from a Utah Used Oil Collection Center.
- II.A.8. The Permittee shall determine the halogen content by collecting a representative sample in accordance Attachment 3 (Sample Collection Procedures) and 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 2 (Sampling and Analysis Plan).
- II.A.8.a. The Permittee shall then record the results of the halogen testing on the shipping document prior to shipment from the facility.

II.A.9. 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.10. 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 oils 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 containers meeting the requirements of R315-15-4.6 Utah Administrative Code. The containers are stored in the facility's hazardous waste container storage area in the warehouse and other portions of the facility that are secured from the public and have concrete, plastic, asphalt or metal (or other materials capable of containing used oil) secondary containment sufficient to hold 110% of the contents of the largest.

II.C. Used Oil Loading and Unloading Requirements

II.C.1. The Permittee shall secure the vehicle by positioning wheel chocks and applying 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.

II.C.5. Containers of used oil may be pumped into a highway tanker if the drum and tanker hose connections are within secondary containment. Containment must be sufficient for 110% of the volume of the largest container being pumped.

II.D. Used Oil Sampling and Analysis

II.D.1. The Permittee shall sample used oil accepted at the facility when required by Condition II.A of this Permit in accordance with the requirements of the Attachment 2 (Sampling and Analysis Plan) and Attachment 3 (Sample Collection Procedures).

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 or process 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 or other appropriate materials.
- 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 1 (Emergency Spill Plan) of this Permit. The Permittee shall conduct and document weekly inspection of the spill kits.
- 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 4 (Closure Plan and Cost Estimate) and evaluate 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.

- II.G.2. Closure shall include, but not be limited to, used oil storage areas, loading docks, sumps, ancillary equipment and piping, and any contaminated soil or groundwater contaminated from used oil activities at the site. The Permittee shall implement Tasks 1 through three described in II.G.3 through II.G.5 in the manner described in the closure plan, Attachment 4 (Closure Plan & Cost Estimate).

II.G.3. Soil and Groundwater Testing (Task 1)

- II.G.3.a. Soil and groundwater samples shall be tested for PCBs, Oil and Grease, Diesel Range Organics (DRO), Gasoline Range Organics (GRO), metals, semi-volatiles and volatiles. The Permittee shall submit a Level IV analytical data package with the testing results from a Utah certified laboratory within 30 days of receipt to the Director for review and approval.

II.G.4. Facility Decommission and Certification (Task 2)

- II.G.4.a. Specific requirements include removal of all used oil and other media from all tanks, containers, piping, pumps, filters and other ancillary equipment.
- II.G.4.b. A permitted used oil transporter shall remove used oil to a recycling facility or a waste disposal facility approved by the Director.
- II.G.4.c. Rinsate water generated from used oil cleaning operations shall be transported to a recycling facility or a waste disposal facility approved by the Director.

II.G.5. Closure Certification (Task 3)

II.G.5.a. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, certification that the facility has been closed in accordance with the approved closure plan. An independent, Utah- registered professional engineer and the Permittee shall sign the closure certification.

II.G.5.b. Additional sampling and remediation may be required by the Director to verify that cleanup and closure has been completed in accordance with R315-15 of the Utah Administrative Code.

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Attachment 1
Emergency Spill Plan

General Procedures

In the event of a release of used oil, the Safety-Kleen, employee will immediately take the following appropriate actions to contain and minimize the spill and the threat to life, health, environment and property:

1. The Safety-Kleen employee will attempt to control or stop the leak if it can be done safely.
2. Use absorbent material, booms, spill pads and dirt dams and dikes if necessary to control the material. If possible, keep spilled material out of storm drains and open waterways.
3. Contact 911 emergency responders if needed.
4. Contact his supervisor.
5. If necessary, the supervisor will contact an authorized waste remediation company for assistance with the clean- up.
6. Used oil spills exceeding 25 gallons, or that pose a risk to human health and the environment, shall be reported Safety-Kleen management, and to the Utah Department of Environmental Quality and any other applicable regulatory agency immediately after containment of the spill (Table 1).

Table: 1: Regulatory Agency Notification Numbers

Regulatory Agency	Contact Phone Number
National Response Center	(800) 424-8802 or (202) 426-2675
Utah Department of Environmental Quality (within 24 hrs.)	(801) 536-4123
Utah State Highway Patrol	(801) 538-3400

7. The following information shall be provided by telephone to the Utah State Department of Environmental Quality's, 24-hour answering service at 801-536-4123:
 - a. Name, telephone number and address of parties responsible for the release.
 - b. Name, title and telephone number of individual reporting.
 - c. Time and date of the release.
 - d. Location of the release, as specific as possible including nearest town, city, highway or waterway.
 - e. Description of released material found on the manifest or shipping document, along with the amount of material released.
 - f. Cause of the release.
 - g. Possible hazards to human health or the environment and the emergency action taken to minimize the threat.

- h. The extent of injury, if any
8. If a spill occurs on a highway or railway, employees should immediately stop the release if possible, secure the scene and contain the spill. Safety-Kleen shall give notice, if required by 49 CFR 171.15 to the National Response Center (Table 1). *The Utah State Highway Patrol (Table 1) shall be contacted if the spill restricts a public road.*
 9. A spill report of used Oil spills exceeding 25 gallons, or that pose a risk to human health and the environment, shall be submitted to the Division of Waste Management and Radiation Control within 15 days of the spill in accordance with R315-15-9.1.
 10. The driver/employee shall immediately notify their Safety-Kleen supervisor. If after hours, initial notification is to be made to the 24-hour emergency contacts in Table 2 below. If there are, injuries to personnel/public or the spill will require additional emergency responders to contain then all 911 to request help. The discharge notification form is included in this spill plan shall be completed by the operator after containment of the used oil, notification to emergency responders (if applicable) and Safety-Kleen management.

Table 2: Emergency Contacts List

Contact Person	Title	Contact Information
Company 24 Hour Emergency Response	Emergency Response	Clean Harbors 1-800-483-3718 Safety-Kleen 1-800-468-1760
Fire Response	NA	911

11. The transfer facility shall maintain absorbents and equipment to contain a leaking containers and spills. At a minimum each used oil transfer facility spill kit shall contain the items listed in Table 3.

Table 3: Spill Equipment Inventory for Transfer Facility

Equipment Description	Quantity
Shovel	1
Broom	1
Buckets	2
Spill Absorbent Pads	10
Granulated Absorbent	2 ft ³
Absorbent Boom/oil sock	1
Used Oil Emergency Controls -Spill Plan with Emergency Contact Numbers	1
First Aid Kit and Fire Extinguisher	1 each

12. Employees are exempted from reporting de minimis drips to management that are immediately cleaned up by the responsible employee.
13. The Safety-Kleen supervisor shall be responsible to initiate and complete any reporting and notification to the required Federal, State and local agencies

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Attachment 2

Sampling and Analysis Plan

A. Bulk and Drum Sample Collection Requirements

- A.1. The Permittee shall collect a representative sample from containers to determine the halogen content when required by II.A in accordance with the sampling collection procedures in Attachment 3. Sampling personnel shall be trained on appropriate sampling methods for each type of container and matrix.
- A.2. Bulk containers of used oil must be sampled and analyzed individually. Composite sampling is not allowed.

B. Halogen Field Screening Methods

- B.1. The Permittee shall screen used oil or oily water subject to R315-15 of the Utah Administrative Code in accordance with the following requirements:
- B.1.a. CLOR-D-TECT® halogen test kit (EPA Method 9077) for oil containing less than 20% water; or
- B.1.b. HYDROCLOR-Q® test kit if the oil contains between 20% and 70% water using the following conversion formula:

$$\text{True Halogen Concentration} = \text{Reading Syringe} + [(10 + \text{ml oil in sample})/10]$$

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:

$$2,000 \text{ ppm} [(10 \text{ ml} + 4 \text{ ml})/10] = 2,800 \text{ ppm}$$

- B.1.c. HYDROCLOR-Q test kit without correction for oil containing greater than 70% water.

C. Quality Control Sample

- C.1. A The CLOR-D-TECT® kit (Method 9077 of SW846) requires that a quality control sample (duplicate) be analyzed for each sampling event.

D. Halogen Laboratory Analytical Methods

- D.1. When relying on laboratory testing, the Permittee shall submit a representative used oil sample to a Utah-certified laboratory to analyze for total halogen concentrations using Method 9076.

E. Rebuttable Presumption

- E.1. The Permittee may rebut the hazardous waste presumption in accordance with R315-15-4.5 of the Utah Administrative Code if the Permittee can demonstrate that the used oil does not contain significant concentrations of any of the halogenated hazardous

constituents listed in Appendix VIII of EPA CFR 40, Part 261 which includes volatiles, semi-volatiles, PCBs, pesticides, herbicides and dioxin/furans.

F. PCB Contaminated Used Oil

- F.1. The Permittee shall obtain analytical results of dielectric oil used in transformers and other high voltage devices, verifying the PCB concentrations are less than 50 mg/kg prior to loading and storing the used oil in the rail cars.
- F.2. Used oil shall not be diluted to avoid any provision of any federal or state environmental rules.
- F.3. Unless tanks, containers, and piping that previously contained PCB-contaminated material are decontaminated as described in 40 CFR 761 Subpart S prior to transferring used oil, the used oil is considered to have been mixed with PCB-contaminated material in accordance with R315-15-18 and 40 CFR 761 Subpart S.
- F.4. Laboratory testing for PCBs shall be conducted in accordance with R315-15-18(d) of the Utah Administrative Code when used to satisfy any requirements of R315-15 of the Utah Administrative Code and this Permit.

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Attachment 3

Sample Collection Procedures

Safety-Kleen Systems Inc. employees shall use the sampling procedures below to collect representative sample from customers' tanks and containers when screening used oil for halogen content prior to collection.

Procedure 1: Containers - 375 gallons or less

Sampling Equipment: Composite Liquid Waste Sampler (COLIWASA) nominally 175 ml, 39 inch, sample jar.

Step 1

Take COLIWASA and dip into drum or tote make sure the tube fills up a good cross section before closing.

Step 2

Open sample jar and dispense the entire contents from COLIWASA into sample jar

Step 3

Screen sample using CLOR-D-TECT halogen test kit.

Step 4

Empty the sample in the bucket back into the used oil container/tank.

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Attachment 4

Facility Closure Plan & Cost Estimate

CLOSURE COST ESTIMATE

Closure Cost Estimate Worksheet, Used Oil Transfer Facility, Safety-Kleen Systems, Inc., Pioneer Road Service Center, Salt Lake City, UT revised 8/24/17

	Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal
1	PROJECT COORDINATION AND SCHEDULING				
	<u>Prime Contractor Costs (note 1)</u>				
	- Obtain subcontractor quotes to implement closure activities	Project Manager	\$115	6	\$690
	- Coordinate scope and schedule of project activities with owner/operator, decontamination contractor, regulatory agencies and analytical laboratory	Project Manager	\$115	4	\$460
	- Review facility permit and closure plan	Project Engineer	\$102	6	\$612
		Field Supervisor	\$82	12	\$984
	- Prepare project/site specific Health and Safety Plan	Health/Safety Specialist	\$102	6	\$612
	- Participate in on-site coordination and orientation meeting with owner/operator and decontamination contractor	Project Manager	\$115	2	\$230
	- Prepare project activity and project status reports	Project Manager	\$115	4	\$460
	- Office Expenses		\$100	1	\$100
	- Miscellaneous Expenses		\$100	1	\$100
	Activity 1. Subtotal				\$4,248

2 MOBILIZE TO SITE AND PREPARE FOR CLOSURE/CLOSURE OVERSIGHT AND SHIP USED OIL CONTAINERS (note 12)

Assumptions

- Permitted used oil storage capacity (3,960 gallons (note 11) or 72, 55-gallon drums)
- Waste oil transported to Hannibal, MO. Unit cost is based on \$60 per 55-gallon drum and includes treatment and disposal. Transportation per load via TriState at \$3052 with 244.16 FSC
- CA Waste oil filters transported to Rialto, CA, Filter Recovery. Unit cost is based on \$111.35 per 55-gallon drum and includes treatment and disposal. Disposal at \$65/55gal drum and trans via Tristate at \$1545/load + 123.60 FSC
- Generator knowledge used for disposal/treatment of used oil (i.e. no sampling required). However, 2 waste characterization samples are conservatively included.
- Prime Contractor per diem includes rental car, room and meals
- Subcontractor costs include labor and all expenses to complete each task
- Onsite closure activities completed in 7 working days, Project Engineer on site for 4 days for inspection/closure activities

Prime Contractor Costs (note 1)

- Project Management and Supervision	Project Manager	\$115	2	\$230
- Supervise waste loading activities	Field Supervisor	\$82	10	\$820
	Travel	\$1,000	1	\$1,000
	Per diem (all activities)	\$150	7	\$1,050
- Collect representative waste characterization sample of drummed wastes	Field Supervisor	\$82	1	\$82
	Supplies/Shipping	\$150	1	\$150

Subcontractor Costs (note 2)

- Subcontractor mobilization/demobilization and licensing	Lump Sum	\$10,000	LS	\$10,000
- Transfer drums in CSA to trucks	Foreman/labor/equipment	\$730	LS	\$730
- Transport drums to TSD for Treatment/Disposal				
Assumes 1 truck to transport 72 drums (80/trailer)				
Drum Transportation at \$3052/load (see note above)	UO Drum Transport	\$3,052	1	\$3,052
Fuel Surcharge (See note above)		\$244	1	\$244
Estimated disposal/treatment cost UO(per drum) - \$60/drum (note 4)	Disposal of drums	\$60	36	\$2,160
Drum Transportation at \$1545/load (see note above)	Oil Filters Drum Transport	\$1,545	1	\$1,545
Fuel Surcharge (See note above)		\$124	1	\$124
Estimated disposal/treatment cost Oil Filters (per drum) - \$65/drum (note 4)	Disposal of drums	\$65	36	\$2,340

Laboratory Subcontractor Costs

- Waste characterization sample analysis (note 3)				
Waste characterization analysis to consist of TCLP VOCs, SVOCs, PCBs and Metals		\$863	2	\$1,726
Sales tax	6.85%	\$60	2	\$121
Sample Shipment (note 8)		\$365	1	\$365

Activity 2. Subtotal

\$25,739

3 DECONTAMINATE ONE CONTAINER STORAGE AREA (note 13)

Assumptions:

- CSA located inside warehouse and consists of a concrete slab floor with curbing and trench and is approximately 840 sq. ft.
- Decontamination shall consist of washing with a high-pressure detergent/water solution and rinsing with tap water
- CSA to remain in-place following closure

- Prime Contractor project engineer and field supervisor travel accounted for in above activities
- Prime Contractor per diem includes rental car, room and meals
- Subcontractor costs include labor and all expenses to complete each task

Prime Contractor Costs (note 1)

- Inspect the floor of CSA for cracks, gaps, or other potential lapses of integrity	Project Engineer	\$102	2	\$204
- Fill cracks and gaps (if necessary) prior to implementing decontamination	Field Supervisor	\$82	2	\$164
- Supervise and document decontamination of CSA	Field Supervisor	\$82	6	\$492

Subcontractor Costs (note 2)

Decontaminate 1 container storage area	Foreman/labor/equipment	\$900	LS	\$900
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Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc.,

and rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums

Cost for transportation and disposal of drums included in Activity 8 below.

Activity 3. Subtotal

\$1,760

4 DECONTAMINATE THE OTHER STORAGE LOCATION IN WAREHOUSE (note 13)

Assumptions:

- Washing shall consist of a high-pressure detergent/water solution and rinsing with tap water. Approximately 380 sq. ft.
- Prime Contractor project engineer and field supervisor travel and per diem accounted for in above activities
- Prime Contractor per diem includes rental car, room and meals
- Subcontractor costs include labor and all expenses to complete each task

Prime Contractor Costs (note 1)

- Supervise and document removal of residual sludges (if necessary)	Field Supervisor	\$82	4	\$328
- Supervise washing of secondary containment surfaces outside the CSA but in the Warehouse	Field Supervisor	\$82	8	\$656
- Inspect containment and document with field notes and photographs	Project Engineer	\$102	2	\$204

Subcontractor Costs (note 2)

Decontaminate secondary containment surfaces	Foreman/labor/equipment	\$2,900	LS	\$2,900
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Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc.,

and rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums

Cost for transportation and disposal of drums included in
Activity 8 below.

Activity 4. Subtotal	\$3,988
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5 DECONTAMINATE CLEANUP EQUIPMENT (If Necessary) (note 13)

Assumptions:

- Decontamination of Cleanup Equipment is not anticipated to be necessary. Equipment used to remove waste units will only be used following decontamination of the unit

(i.e. equipment will not come into contact with used oil). Other cleanup equipment such as pressure washers will be cleaned during decontamination of each respective unit.

- If performed, washing of cleanup equipment shall consist of a high-pressure detergent/water solution and triple rinsing with tap water

Prime Contractor Costs (note 1)

- Supervise washing of cleanup equipment	Field Supervisor	\$82	4	\$328
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Subcontractor Costs (note 2)

- Construct decon area with 6ml plastic sheeting and 4" absorbent berm	Foreman/labor/equipment	\$500	LS	\$500
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- Decontaminate cleanup equipment

Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc.,

and rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums

Cost for transportation and disposal of drums included in Activity 8 below.

Activity 5. Subtotal	\$828
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6 CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES (note 13)

Assumptions:

- 900 gallons of wash water generated from decontamination of CSA = 18 drums

- 400 gallons of wash water generated from decontamination of warehouse secondary containment areas outside of the CSA = 8 drums

- PPE, plastic sheeting, disposable cleanup equipment, consumables, etc. contained in 3 drums

- Waste characterization samples not necessary for wash/water disposal (per generator knowledge this is oily water)

Prime Contractor Costs

- Ensure drums are properly labeled, coordinate pick up and disposal (note 1)	Project Manager	\$115	4	\$460
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- Purchase 29 55-gallon drums (notes 9 & 10)	Drums @ \$40 each (delivered)	\$40	29	\$1,160
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Subcontractor Costs

- Transfer drums of decon waste to trucks (note 2)	Foreman/labor/equipment	\$0	LS	\$0
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(no charge, included in above costs)

- Transport drums to TSD for Treatment/Disposal (notes 5, 6 & 7)

Assumes 1 truck to transport 29 drums (80/trailer)

Drum Transportation at \$1100/load

Fuel Surcharge (per UDEQ request)

Estimated disposal/treatment cost cleanup debris drums- \$60/drum

Estimated disposal/treatment cost for oily water - \$85/drum

Drum Transport	\$1,100	1	\$1,100
5%	\$55	1	\$55
Disposal of drummed debris	\$60.00	3	\$180
Disposal of drummed wash water	\$85.00	26	\$2,210

Activity 6. Subtotal

\$5,165

7 CLOSURE CERTIFICATION REPORT (note 1)

Assumptions:

- CLOSURE CERTIFICATION REPORT certified by an Utah-registered PE and S-K

Prime Contractor Costs

- Compile field notes and photographs	Project Manager	\$115	2	\$230
	Project Engineer	\$102	2	\$204
- Draft Closure Certification Report	Project Manager	\$115	8	\$920
	Project Engineer	\$102	16	\$1,632
- Prepare closure certification statement	Sr. Project Engineer	\$152	2	\$304
- Office Expenses	Drafting/Clerical	\$400	1	\$400
- Miscellaneous Expenses	Copying/Postage	\$100	1	\$100

Activity 7. Subtotal

\$3,790

COST ESTIMATE ACTIVITIES SUMMARY

1	PROJECT COORDINATION AND SCHEDULING	\$4,248
2	MOBILIZE TO SITE AND PREPARE FOR CLOSURE/CLOSURE OVERSIGHT AND SHIP USED OIL CONTAINERS (note 12)	\$25,739
3	DECONTAMINATE ONE CONTAINER STORAGE AREA (note 13)	\$1,760
4	DECONTAMINATE THE OTHER STORAGE LOCATION IN WAREHOUSE (note 13)	\$3,988
5	DECONTAMINATE CLEANUP EQUIPMENT (If Necessary) (note 13)	\$828
6	CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES (note 13)	\$5,165
7	CLOSURE CERTIFICATION REPORT (note 1)	\$3,416

TOTAL CLOSURE COST ESTIMATE

\$45,144

CONTINGENCY UDEQ OVERSIGHT 5% \$2,257.18

CONTINGENCY FOR ANY OTHER COST OVERRUNS 10% \$4,514.36

TOTAL CLOSURE COST ESTIMATE WITH CONTINGENCY

\$51,915

Notes:

- 1 Prime Contractor Rates obtained from Trihydro Corporation 2017 Schedule of Charges, Laramie, WY
- 2 Subcontractor prices provided by Evans Environmental Construction, Glenwood, Iowa
- 3 Laboratory Subcontractor Rate Obtained From Test America, Pittsburgh, PA Quote
- 4 Off-spec Used Oil treatment/disposal unit cost obtained from Green America at \$60 per 55 gallon drum.
Used CAWaste Oil Filters to Filter Recovery, Rialto, CA at \$65/ 55 gallon drum.
- 5 Drummed wash water & debris treatment/disposal unit cost obtained from Wasatch Landfill, Utah Facility at \$85/drum liq
- 6 Drummed cleanup debris disposal: \$60 / 55 gallon drum at Wasatch Landfill.
- 7 Transportation of drums via Action Resources to Wasatch Landfill \$1100/load + 5% FSC
- 8 FedEx Overnight Shipping Costs
- 9 Eagle Peak Container's Inc. - Reconditioned 55 gal DOT Stamped steel drums quote \$22.50 per container.
- 10 Eagle Peak Container's Inc. - Delivery costs for 50 Reconditioned 55 gal DOT Stamped steel drums quote \$866 or \$17.32 per drum.
- 11 Permit - Part II.A.1
- 12 Permit - page 16
- 13 Permit - page 17

DRAFT Permit for Public Comment